



# Volume III: Public Participation Report

Proposed Khoe Wind Energy Facility  
and associated Infrastructure, Western  
Cape Province.

PREPARED FOR

DFFE  
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Proposed Khoe Wind Energy Facility and associated Infrastructure,  
Western Cape Province.

0695823



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## 1. INTRODUCTION

FE Hugo & Khoe (Pty) Ltd ('the Project Applicant') is applying for environmental authorisation ('EA') to construct and operate the up to 232 MW Khoe Wind Energy Facility (WEF) and its associated on-site substation and Battery Energy Storage System (BESS) ('the proposed development').

The proposed development is located approximately 20 km southeast of the De Doorns town within the Langeberg Local Municipality and the Cape Winelands District Municipality of the Western Cape Province

In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicant appointed ERM (Pty) Ltd, to act as the Environmental Assessment Practitioner (EAP) and to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for Environmental Authorisation (EA).

## 2. THE PUBLIC PARTICIPATION PROCESS

Engaging with external stakeholders on the project and associated Public Participation Process (PPP) is a key part of the overall S&EIA process. The PPP is key in that it provides the public the opportunity to have meaningful input into the decision-making process. The primary aims of the PPP are:

- To inform Interested and Affected Parties (I&APs) of the proposed development;
- To identify and respond to issues, comments and concerns as raised by I&APs;
- To promote transparency of the project and its potential consequences and ensure I&APs understanding of the proposed development;
- To facilitate open dialogue and liaise with all I&APs;
- To assist in identifying potential environmental (biophysical and socio-economic) impacts associated with the proposed development; and
- To ensure that all I&AP issues and comments are accurately recorded, addressed and documented in a Comments & Response Report.

This Public Participation Report has been compiled as Volume III to the respective Volume I – Draft EIA Report. This report has been updated to include all comments received throughout the application process up until submission of the Final Scoping Report (FSR) to Department of Forestry, Fisheries and the Environment (DFFE) for decision.

The sharing of I&AP information complies with the Protection of Personal Information Act, 2013 (POPI Act 4 of 2013). The following steps have been and will continue to be undertaken throughout the PPP to ensure compliance:

- The contact details, e-mail address and postal address of the public will not be made available for public review, however this will be made available to the Department and to any I&AP who may wish to appeal; and
- The contact details, e-mail address and postal address of I&APs will be blacked out in the Comments and Responses Report and Public Participation Documents.

### 3. METHODOLOGY

The PPP follows the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), as well as the Public Participation Guidelines in terms of NEMA, 1998 EIA Regulations, 2014.

#### 3.1 IDENTIFICATION OF POTENTIAL INTERESTED AND AFFECTED PARTIES

The I&AP database (Appendix A) was created by ERM, in consultation with the Applicant and was used as the baseline for the pre-identified I&APs list.

Pre-identified / Registered I&APs included:

- Pre-identified I&APs who are identifiable affected landowners and surrounding landowners. Landowners and surrounding landowners will also be requested to inform the occupiers of their properties regarding the project.
- Government organisations, NGOs, relevant municipalities, ward councilors and other key stakeholders and organ of states that might be affected.
- Registered I&APs who responded to the advertisements (i.e., newspapers, notices, and e-mails) and requested to be registered or request to register any other person/s.

*This database was updated throughout the duration of the scoping process and will continue to be updated through to the EIA phase. Anyone with an interest in the proposed development and/or associated EIA process are encouraged to register.*

#### 3.2 INITIAL NOTIFICATION PHASE

Initial Notification was conducted prior to the completion of the Draft Scoping Report (DSR). Notification during this phase was undertaken in the following manner:

- Site notices were erected on the WEF site boundary (in English and Afrikaans) on 6 October 2023;
- Poster notices were erected at local shops in the town of Du Doorns and Worcester on 6 October 2023;
- Advertisements were placed in the in one provincial newspaper, The Daily Voice, and one local newspaper, Standard Breederivier Gazzette, on the 14 December 2023; and
- I&APs, stakeholders and organs of state that were identified and / or requested to be registered, were added to the I&AP database.

The public notices and initial notification contained sufficient information on the proposed application and afforded pre-identified and interested I&APs the opportunity to submit their issues / queries / concerns and indicate the contact details of any other potential I&APs that should be contacted and registered. The contact person at ERM, contact number and email details were clearly stated on the notifications.



### 3.3 SCOPING PHASE PPP

#### 3.3.1 AVAILABILITY OF THE DRAFT SCOPING REPORT (DSR) FOR PUBLIC REVIEW

Notification regarding the availability of the DSR for public review and comment (Appendix D) were sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the initial period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail. SMS notifications were sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who did not have an email. The written notification also advised registered I&APs of the following:

- How and where they could access the DSR (electronic and hardcopy);
- The duration that the DSR was made available for public comment, and the date by when comments must be submitted; and
- To submit their comment / questions / queries / concerns regarding the development and content of the DSR.

The table below presents the respective locations the DSR was made available for public review and comment from **Thursday, 29 February 2024 to Tuesday, 02 April 2024 (both days inclusive)**. **The commenting period was 30 days, as per the NEMA, 1998 EIA Regulations, 2014 (as amended)**.

Location	Physical Address
Hard Copy Location	
De Doorns Public Library	7 Station Road, De Doorns, 6875, South Africa
CD copies were available upon request.	
Electronic Copy Locations	
ERM Website	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
Electronic Transfer	Interested and Affected Parties (I&APs) could request for copies to be shared via a One Drive folder.

### 3.3.2 SUBMISSION OF THE FINAL SCOPING REPORT (FSR)

The Final Scoping Report (FSR) was submitted to the DFFE on the 04 April 2024 and acceptance received on the 20 May 2024.

Notification regarding the submission of the FSR to DFFE for a decision was sent to all registered I&APs in the following manner:

- Written Notification (English) was sent to all registered I&APs via e-mail.

## 3.4 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PHASE PPP

### 3.4.1 AVAILABILITY OF THE DRAFT EIA REPORT FOR PUBLIC REVIEW

Notification regarding the availability of the Draft EIA report for public review and comment (Appendix D) were sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the PP period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail. SMS notifications was sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who did not have an email / postal address. The written notification also advised registered I&APs of the following:

- How and where they could access the Draft EIA report (electronic and hardcopy);
- The duration that the Draft EIA report was made available for public comment, and the date by when comments must be submitted; and
- It afforded I&APs the opportunity to submit their comment / questions / queries / concerns regarding the development and content of the Draft EIA report.

The table below presents the respective locations the Draft EIA report was made available for public review and comment from **23 August 2024 – 23 September 2024 (both days inclusive)**:

Location	Physical Address
Hard Copy Location	
De Doorns Public Library	7 Station Road, De Doorns, 6875, South Africa
CD copies were available upon request.	
Electronic Copy Locations	
ERM Website	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
Electronic Transfer	Interested and Affected Parties (I&APs) could request for copies to be shared via a One Drive folder.

**The commenting period was 30 days, as per the NEMA, 1998 EIA Regulations, 2014 (as amended).**

### 3.4.2 SUBMISSION OF THE FINAL EIA REPORT

- Written Notification (English and / or Afrikaans) regarding the submission of the Final EIA report for EA will be sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the PP period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail.
- SMS notifications will be sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who do not have a postal or email addresses.
- If written notification cannot be sent to an I&AP, notification will be provided telephonically.

## 4. DECISION AND APPEAL PHASE

All registered I&APs will be provided with access to the decision on the EIA Report and the reasons for such decision. Registered I&APs will also be notified of the appeal process and that appeals can be lodged against the decision in terms of the NEMA, 1998, National Appeal Regulations, 2014 (as amended).

Notifications regarding the DFFE decision will be provided in the following manner to all registered I&APs:

- Via e-mail, which will include an attachment of the decision, reasons for the decision, and appeal procedure;
- Via SMS, which will be sent to I&APs and land occupiers that have supplied mobile phone numbers and who do not have a postal or email addresses. The SMS will advise the I&AP that access to the decision, reasons for the decision, and appeal procedure must be accessed from the ERM website: <https://www.erm.com>; and
- Courtesy telephone calls will be made to those who cannot be contacted by either of the above-mentioned methods to advise them of the decision made by the DFFE and to confirm if and / or how they wish to receive access to the decision, reasons for decision, and appeal procedure.

I&APs will be provided with access to the decision, reasons for the decision by the DFFE and the process for appeals within 14 days of date of receipt of the decision.

## 5. SUMMARY OF COMMENTS

### Initial Notification Phase

During the initial notification phase, no comments / queries / questions / concerns were received from I&APs.

### Scoping Phase

During the scoping phase, comments were received from the DFFE, other authorities and I&APs. Follow-up e-mails were sent to all registered I&APs, stakeholder and authorities, and no further comments were received.

Responses to comments received during the scoping period are provided in the below tables, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report (Appendix F).

## **EIA Phase**

During the EIA phase, comments were received from the DFFE, other authorities and I&APs. Follow-up e-mails were sent to all registered I&APs, stakeholder and authorities, and no further comments were received.

Responses to comments received during the EIA period are provided in the below tables, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report (Appendix F).

RESPONSES AND COMMENTS RECEIVED ON DRAFT SCOPING REPORT SUBMITTED ON THE 29 FEBRUARY 2024

TABLE 5-1 RESPONSES TO COMMENTS

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>17 April 2024</b></p> <p><b>Leeuwenboschfontein Observatory</b></p> <p><b>Marius Reitz</b></p>	<p>Draft Scoping Phase</p>	<p>Leeuwenboschfontein Observatory is an astronomical observatory that will be impacted by the windfarm development. The windfarm and support structures will cause potential light pollution and create a light dome that will affect our astronomical observation.</p>	<p>Please note, the observatory will be included as a visual receptor and impacts to be assessed during the EIA Phase.</p>
<p><b>17 April 2024</b></p> <p><b>Porcupine Peak Guest Farm</b></p> <p><b>Robin Mackinnon</b></p>	<p>Draft Scoping Phase</p>	<p>I would like confirmation of the boundaries for portion 1 and 2 of 38 as well as 3 of 37. My farm is "Portion 6 (Portion of Portion 2) of 38" plus "Remainder of the farm Koenies Kraal No. 55" From your map above it seems there may be an error related to the boundaries</p>	<p>HI Robin,</p> <p>Turbine 20 is situated ~100m from the farm boundary of RE/38. This is to cover the blade length from the neighbouring farm and adherent to the land use scheme of the respective local municipality.</p> <p>The affected farm – 2/38 – forms part of the facility, and an agreement is in place with the landowner. Similarly, all farm boundaries aka cadastre used to delineate the farms were sourced from the surveyors general office.</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
			Can you please verify coordinates of position B.
<p><b>29 April 2024</b></p> <p><b>RE Farm De braak Montagu</b></p> <p><b>Mrs Hester Kuhn</b></p>	Draft Scoping Phase	<ol style="list-style-type: none"> <li>1. Damage to infrastructure surrounding Wind Farm during the process of erecting the Wind farms</li> <li>2. Aesthetically unpleasing</li> <li>3. Noise pollution (aerodynamic noise/vortex and mechanical noise Shadow flickers</li> <li>4. Wildlife: flying animals (currently there is a pair of endangered eagles in the mountains with fledglings,</li> <li>5. Blue crane birds, migrating ducks and geese, owls, bats , crows and hawks.</li> <li>6. Disturbance to Fona and Flora</li> <li>7. Affecting tourism, which thies area highly relies on</li> <li>8. Lightning and fire damages to turbines</li> <li>9. Wind-turbine syndrome due to possible fluctuations in air pressure, vibrations and infrasound - further</li> <li>10. research still undergoing but can't with 100% be disregarded</li> </ol>	

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>6 May 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government – Department of Agriculture</b></p>	<p>Draft Scoping Phase</p>	<p>Hi Khosi Ngema Please find attach comments from the WCDoA: LUM.</p> <p>With many thanks and kind regards</p> <p>Brandon Layman</p>	<p>Good day Thank you for your comment, these have been taken into consideration into the EMPr.</p>
<p><b>6 May 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government – Department of Agriculture</b></p> <p><b>ATTACHMENT: SKM_C250i2405061 5310.pdf</b></p>	<p>Draft Scoping Phase</p>	<p>A tt: Khosi Ngema DRAFT SCOPING REPORT PROPOSED KHOE WIND ENERGY FACILITY: DIVISION WORCESTER REMAINDER OF PORTION 1 OF THE FARM EENDRAGT NO 38 PORTION 3 OF THE FARM EENDRAGT NO 38 PORTION 11 OF THE FARM EENDRAGT NO 38 FARM NO 193 REMAINDER OF THE FARM EENDRAGT NO 37 Your application of February 2024 has reference. Please refer to comments from our Western Cape Department of Agriculture: Land-Care Cape Winelands office dated 07 February 2024 attached. Please note: Kindly quote the above-mentioned reference number in any future correspondence in respect of the application. The Department reserves the right to revise initial comments and request further information based on the information received.</p>	<p>EAP acknowledges receipt thereof.</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>6 May 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government – Department of Agriculture</b></p> <p><b>ATTACHMENT: SKM_C250i2405061 5430.pdf</b></p>	<p>Draft Scoping Phase</p>	<p>Att: Khosi Ngema Environmental Impact Assessment Process for the Proposed Khoe Wind Energy Facility near De Dooms, Western Cape The purpose of this report is to provide comment on the proposed development on behalf of The Western Cape Department of Agriculture, Directorate: Sustainable Resource Use and Management, Sub-Programme: LandCare.</p> <p>1. Farm Details Applicant: FE Hugo &amp; Khoe (Pty) Ltd Farm Owner(s): Sandvlei Trust, JH le roux &amp; SML le Roux Farm Name: Farm Eendragt &amp; Farm Plaas 193 Location: The proposed Khoe WEF is located near De Dooms within the Langeberg Local Municipality in the Western Cape Province. Property: RE/1 /38, 3/38, 11 /38, 193 &amp; RE/37</p> <p>2. Legislative Context As per the Conservation of Agricultural Resources Act: Act 43 of 1983 (CARA) regulations, the landowner and/or user should:</p> <ul style="list-style-type: none"> <li>• Protect the cultivated land on his farm unit effectively against excessive soil loss as a result of erosion through the action of water and wind.</li> <li>• Protect the irrigated land on his farm unit effectively against waterlogging and salinization.</li> <li>• Not utilize the vegetation in a vlei, marsh or water sponge or within the flood area of a watercourse or within 10 meters horizontally outside flood area in a manner that causes or may cause the deterioration of or damage to the natural agricultural resources.</li> <li>• Should not develop any slopes more than 20% grade unless authorized in writing by the executive officer.</li> <li>• Remove and control all declared weeds and invasive plants as listed in Regulation 15, Table 3.</li> </ul> <p>3. Observations/Discussion</p>	<p>EAP acknowledges receipt thereof.</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>Environmental Resource Management Southern Africa (Pty) Ltd ('ERM') has been appointed by FE Hugo &amp; Khoe (Pty) Ltd to act as the independent environmental impact assessment practitioner [EAP] to undertake the Scoping and Environmental Impact Assessment (S&amp;EIA) process for Environmental Authorization, as stated in the Draft Scoping Report.</p> <p>FE Hugo and Khoe (Pty) Ltd is applying for an Environmental Authorization to construct and operate the Khoe Wind Energy Facility (WEF) with a capacity of up to 290 MW and a lifespan of 20-25years. The grid connection is to be assessed in a separate application process. The development footprint of the proposed site will be up to 85 ha. The final total will be finalized after the public participation process has been completed. A site visit may be conducted later in the EIA process. The proposed development will comprise of the following infrastructure:                      Up to 38 wind turbines with a maximum tip height of up to 250 m and a rotor diameter of up to 200m.</p> <ul style="list-style-type: none"> <li>• Each turbine with have a capacity of up to 7.5MW</li> <li>• A transformer at the base of each turbine.</li> <li>• Concrete turbine foundations approximately up to 1 000m<sup>2</sup> per turbine</li> <li>• Each turbine will have a hardstand area of approximately up to 7500m<sup>2</sup> per turbine</li> <li>• Temporary laydown areas (with a footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area.</li> <li>• Battery Energy Storage System (BESS) (with a footprint of up to approximately 5 ha).</li> <li>• Cabling between the turbines, to be laid underground where practical.</li> <li>• One on-site substations of up to 2.5 ha in extent to facilitate the connection between the WEF and the electricity grid.</li> <li>• Access roads to the site and between project components inclusive of stormwater infrastructure. A 13.5 m road corridor may be temporarily impacted upon during construction and rehabilitated to 8m wide after construction.</li> </ul>	

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha).                      Operation and Maintenance (O&amp;M) buildings (with a combined footprint of up to 1 ha) including a gate house, security building, control centre, offices, warehouses, a workshop and visitor's centre                      The property is currently used for the grazing of livestock, approximately 11 ha for cultivating wheat and 1.6ha for planted pastures, as can be seen from Cape Farm Mapper Version 3. The preferred alternative for the substation, BESS, OM and laydown area is situated on fallow land. Turbines 5, 6, 14, 9 and 10 are also situated on fallow land. Turbine 31 is situated between old fields. A desk-top study informs the recommendations made below.</p> <p>4. Comments/Recommendations</p> <p>4.1. After the construction phase of the WEF, the new impermeable hard surfaces will have runoff generated from it. The hard standing foundations also impede the normal flow of the surface and subsurface water. The areas must be monitored for signs of erosion and waterlogging and mitigation measures must be implemented to reduce these risks. Such mitigation measures, among others, would include the installation of drainage pipes that would reduce the risk of waterlogged areas around the turbine foundation. This may be especially necessary for turbines 5, 6, 14, 9 and 10 as it is situated on fallow land having a lower altitude as well as for the preferred alternative for the substation, laydown area, BESS and OM. The same principle applies to the establishment of new roads or access routes. The proposed new access road to the turbines would be crossing the natural drainage lines of the drainage basin. The Department, therefore, requests that a detailed water run-off control plan be developed and implemented.</p> <p>4.2. The Western Cape Department of Agriculture has no objection to the proposed Wind Energy Facility on condition that the agricultural activities takes place on a continuous basis throughout all phases of the project.</p>	



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>4.3. Clear communication must be established between the farmer and the applicant so that the project activities do not interfere with the day-to-day farming operations.</p> <p>4.4. Should the waterlogged areas become a problem the farmer/landowner may contact the Local LandCare office for assistance in this regard.</p> <p>4.5. Further comment will be provided once more information becomes available and a site visit has been conducted, should it be required.</p>	
<p><b>6 May 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government – Department of Agriculture</b></p>		<p>Hi Khosi Ngema Please find attach comments from the WCDoA: LUM. With many thanks and kind regards Brandon Layman</p>	<p>Good day Thank you for your comment, these have been taken into consideration into the EMPr.</p>
<p><b>6 May 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government – Department of Agriculture</b></p> <p><b>ATTACHMENT – SKM_C250I2405061 5280.pdf</b></p>	<p>Draft Scoping Phase</p>	<p>A tt: Khosi Ngema DRAFT SCOPING REPORT PROPOSED HUGO WIND ENERGY FACILITY: DIVISION WORCESTER REMAINDER OF THE FARM OU KRAAL NO 145 REMAINDER OF THE FARM STINKFONTEINS BERG NO 147 REMAINDER OF THE FARM DTINKFONTEIN NO 172 FARM DRIEHOEK NO 173 REMAINDER OF THE FARM PRESENTS KRAAL NO 174 PORTION 9 OF THE FARM HELPMEKAAR NO 148 Your application of February 2024 has reference.</p>	

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>Please refer to comments from our Western Cape Department of Agriculture: Land-Care Cape Winelands office dated 07 February 2024 attached.</p> <p>Please note: Kindly quote the above-mentioned reference number in any future correspondence in respect of the application. The Department reserves the right to revise initial comments and request further information based on the information received.</p>	
<p><b>6 May 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government – Department of Agriculture</b></p> <p><b>ATTACHMENT – Official comments from DoA-Hugo WEF.pdf</b></p>	<p>Draft Scoping Phase</p>	<p>Att: Khosi Ngema Environmental Impact Assessment Process for the Proposed Hugo Wind Energy Facility near De Doorns, Western Cape</p> <p>The purpose of this report is to provide comment on the proposed development on behalf of The Western Cape Department of Agriculture, Directorate: Sustainable Resource Use and Management, Sub-Programme: LandCare.</p> <p>1. Farm Details Farm Owner: FE Hugo &amp; Khoe (Pty) Ltd Farm Name: Dirk Uys Boerdery (Pty) Ltd (9/148) &amp; Blue Dot Prop 424 (Pty) Ltd Location: Approximately 33.5 km southeast of De Doorns within the Breede Valley Local Municipality and the Cape Winelands District Municipality. Property: RE/145, RE/147, RE/172, 173, 174 &amp; 9/148</p> <p>2. Legislative Context As per the Conservation of Agricultural Resources Act: Act 43 of 1983 (CARA) regulations, the landowner and/or user should: <input type="checkbox"/> Protect the cultivated land on his farm unit effectively against excessive soil loss as a result of erosion through the action of water and wind.</p>	

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		<p> <input type="checkbox"/> Protect the irrigated land on his farm unit effectively against waterlogging and salinization.  <input type="checkbox"/> Not utilize the vegetation in a vlei, marsh or water sponge or within the flood area of a watercourse or within 10 meters horizontally outside flood area in a manner that causes or may cause the deterioration of or damage to the natural agricultural resources.  <input type="checkbox"/> Should not develop any slopes more than 20% grade unless authorized in writing by the executive officer.  <input type="checkbox"/> Remove and control all declared weeds and invasive plants as listed in Regulation 15, Table 3.                 </p> <p>3. Observations/Discussion</p> <p>Environmental Resource Management Southern Africa (Pty) Ltd ('ERM') has been appointed by FE Hugo &amp; Khoe (Pty) Ltd to act as the independent environmental impact assessment practitioner (EAP) to undertake the Scoping and Environmental Impact Assessment (S&amp;EIA) process for Environmental Authorization, as stated in the Draft Scoping Report.</p> <p>With a maximum combined output capacity of 360 MW and an anticipated lifespan of 20–25 years, the proposed Hugo WEF will consist of up to 48 turbines, each with an approximate capacity of 7.5 MW. The final total will be finalized after the public participation process has been completed. A site visit may be conducted later in the EIA process.</p> <p>As extracted from the Draft Scoping Report, the proposed development will comprise of the following infrastructure:</p> <ul style="list-style-type: none"> <li>• Up to 48 wind turbines with a maximum tip height of up to 250 m and a rotor diameter of up to 200m.</li> <li>• Each turbine with have a capacity of up to 7.5MW</li> <li>• A transformer at the base of each turbine.</li> <li>• Concrete turbine foundations - approximately up to 1000m<sup>2</sup> per turbine.</li> <li>• Each turbine will have a hardstand of approximately up to 7500m<sup>2</sup> per turbine.</li> </ul>	

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		<p>Temporary laydown areas (with a footprint of up to 9 ha), which will accommodate the boom erection, storage and assembly area.</p> <ul style="list-style-type: none"> <li>• Battery Energy Storage System (BESS) (with a footprint of up to approximately 5 ha).</li> <li>• Cabling between the turbines, to be laid underground where practical.</li> <li>• One on-site substation of up to 2.5 ha in extent to facilitate the connection between the WEF and the electricity grid.</li> <li>• Access roads to the site and between project components inclusive of stormwater infrastructure. A 13.5 m road corridor may be temporarily impacted upon during construction and rehabilitated to 6m wide after construction.</li> </ul> <p>A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha).</p> <ul style="list-style-type: none"> <li>• Operation and Maintenance (O&amp;M) buildings (with a combined footprint of up to 1 ha) including a gate house, security building, control centre, offices, warehouses, a workshop and visitor’s centre.</li> </ul> <p>The property is currently used for the grazing of livestock, approximately 11ha for cultivating wheat and 1.6ha for planted pastures, as can be seen from Cape Farm Mapper Version 3. The preferred alternative for the substation, BESS, OM and laydown area is situated on fallow land. Turbines 14, 17, 20, 22, 24 and 25 are also situated on fallow land. A desk-top study informs the recommendations made below.</p> <p>4. Comments/Recommendations</p> <p>4.1. After the construction phase of the WEF, the new impermeable hard surfaces will have runoff generated from it. The hard standing foundations also impede the normal flow of the surface and subsurface water. The areas must be monitored for signs of erosion and waterlogging and mitigation measures must be implemented to reduce these risks. Such mitigation measures, among others, would include the installation of drainage pipes that would reduce the risk of waterlogged areas around the turbine foundation. This may be especially necessary for turbines 14,17, 20, 22, 24 and 25 as it is situated on fallow land previously cultivated as</p>	

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		<p>well as for the preferred alternative for the substation, laydown area, BESS and OM. The same principle applies to the establishment of new roads or access routes. The proposed new access road to the turbines would be crossing the natural drainage lines of the drainage basin. The Department, therefore, requests that a detailed water run-off control plan be developed and implemented.</p> <p>4.2. The Western Cape Department of Agriculture has no objection to the proposed Wind Energy Facility on condition that the agricultural activities takes place on a continuous basis throughout all phases of the project.</p> <p>4.3. Clear communication must be established between the farmer and the applicant so that the project activities do not interfere with the day-to-day farming operations.</p> <p>4.4. Should the waterlogged areas become a problem the farmer/landowner may contact the Local LandCare office for assistance in this regard.</p> <p>4.5. Further comment will be provided once more information becomes available and a site visit has been conducted, should it be required.</p>	



**TABLE 5-2 RESPONSES TO COMMENTS FROM DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>07 March 2024</b></p> <p><b>Email</b></p> <p><b>Department of Environmental Affairs and Planning (Thea Jordan, Adri La Meyer)</b></p>	<p>Draft Scoping Phase</p>	<p>Dear Sadiya, I hope you are well. The email received from my colleague refers.</p> <p>Please be advised that I am responsible for collating this Department’s comments on all applications where the DFFE or DMRE are the competent authority. It is therefore imperative that my name be added to the I&amp;AP register for both applications and that I be informed of all future DMRE/DFFE applications please. Please also include my director, Ms Thea Jordan, on your I&amp;AP list for all such applications.</p> <p>I note that your email is specific only to the Khoe WEF, but I note that your website also contains an updated DSR for the Hugo WEF. Do you require comments on both or only for Khoe WEF?</p> <p>We have already provided comments on the lapsed applications, and since the scope of the development proposals have not changed, we will not be providing additional or new comments on the new DSR(s). Our previous comments therefore remain valid and should be construed as comments on the new DSR(s). Would you please notify me when the FSRs are accepted by the DFFE and when the Draft EIA Reports are available for comments please</p> <p>Please acknowledge receipt of this email.</p> <p>Kind regards, Adri</p>	<p>Hi Adri, Thank you for your response. Yes, we do require comments on both Hugo and Khoe, albeit the scope for both Hugo and Khoe remain the same. We acknowledge that previous comments made remain valid. We will update the I&amp;AP database accordingly and will notify you once the Draft EIA Report becomes available for public comment. Thank you, Kind Regards Sadiya</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>09 February 2024</b></p> <p><b>Letter received via Email</b></p> <p><b>Department of Environmental Affairs and Planning (Thea Jordan, Adri La Meyer)</b></p>	Draft Scoping Phase	The email notification of 08 January 2024 informing interested and affected parties (“I&APs”) of the availability of the Draft Scoping Report (“DSR”), the follow-up email of 17 January 2024 reminding I&APs of the deadline for comments on the DSR, the Department’s email to the environmental assessment practitioner (“EAP”) on 18 January 2024 requesting proof of notification, and the email response received from the EAP on the same day, refer.	
	Draft Scoping Phase	The Department apologises for submitting its comments one day after the commenting period and expresses its appreciation to the EAP for allowing the time extension. Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment (“EIA”) dated December 2023 that was available for download from the website of the EAP.	
	Draft Scoping Phase	The site is mapped to contain Matjiesfontein Shale Renosterveld, Matjiesfontein Quartzite Fynbos and North & South Langeberg Sandstone Fynbos. These vegetation types are classified as having an ecosystem status of least concern. Please be advised that if no endangered or critically endangered vegetation will be cleared, Activity 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) will not be triggered by the proposed development. (Note that no bioregional plan has been adopted for the Western Cape).	This has been noted. The Application Form has been amended to remove this activity accordingly.
	Draft Scoping Phase	Please further be advised that Activity 14 of Listing Notice 3 will not be triggered by the proposed development since no systematic biodiversity plans or bioregional plans have been adopted by the competent authority.	This has been noted. The Application form has been amended to remove this activity accordingly.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	It is noted that Activity 14 of Listing Notice 1 is being applied for; however, the total storage capacity of the dangerous goods to be stored in containers has not been provided. This must be indicated in the Draft EIA Report.	Details on the total storage capacity of dangerous goods to be stored will be provided in Draft EIA Report.
	Draft Scoping Phase	Note that the onus is on the EAP to provide a clear motivation how the listed activities identified are applicable to the proposed development.	To ensure that all Listed Activities that could potentially be applicable to this project are covered by the Environmental Authorisation, a precautionary approach is followed when identifying listed activities, that is, if an activity could potentially be part of the proposed development, it is listed. Motivations as to the applicability of the listed activities has been provided accordingly.
	Draft Scoping Phase	The proposed development will include the storage of dangerous goods in containers; however, the impacts associated with the storage of dangerous goods have not been identified to be assessed as part of the environmental impact reporting ("EIR") phase. This must be addressed in the Final Scoping Report ("FSR") and where applicable, the Plan of Study for EIA.	To be assessed further during the EIA phase of the project.
	Draft Scoping Phase	Furthermore, the flicker theme has been rated as being of very high significance by the Screening Tool. However, the impacts of flicker effects have not been identified to be assessed as part of the EIR phase. It is however acknowledged that the Scoping Visual Impact Assessment ("VIA") compiled by LOGIS dated November 2023 has indicated that the terms of reference ("ToR") for the VIA in the EIR phase include a shadow flicker assessment. Please update the Plan of Study for EIA accordingly.	The plan of study for Visual in the FSR includes the Shadow Flicker Assessment.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	The DSR indicates that the proposed development will include stormwater infrastructure; however, it is unclear what this will entail. The activity description must be updated to include a description of all the components associated with the proposed development.	Comprehensive details on the stormwater infrastructure, as well as other components associated with the proposed development will be provided during the EIA phase.
	Draft Scoping Phase	A detailed stormwater management plan must be included in the forthcoming Environmental Management Programme ("EMPr").	This is acknowledged and will be included in the EMPr.
	Draft Scoping Phase	A site development plan/ layout that reflects all the components of the proposed development, including buffer and no-go areas, as required in terms of Appendix 3(1)(l)(ii) of the EIA Regulations, 2014 (as amended) must be included in the Draft EIA Report. Further note that the co-ordinates of the wind turbines and the start, middle, and end co-ordinates of the roads must be included in the Draft EIA Report.	A comprehensive site layout plan reflecting no-go areas (according to specialists studies) will be included in the Draft EIA report.  Additionally, co-ordinates of the wind turbines and the start, middle, and end co-ordinates of the roads will be included in the Draft EIA Report.
	Draft Scoping Phase	It is noted that water will be sourced either from Langeberg Municipality, existing boreholes in the area, or new boreholes. Please be advised that if water will be sourced from boreholes, proof of the lawful water use, or the water use licence must be included in the EIA Report.	This is noted. The necessary proofs will be provided in the EIA phase of the project where applicable.
	Draft Scoping Phase	If water will be sourced from the municipality, written confirmation must be provided in the EIA Report that they have sufficient spare, unallocated capacity to supply the proposed development with water.	This is noted. The necessary proofs will be provided in the EIA phase of the project, if applicable.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>It is noted that the National Water Act, 1998 (Act No. 36 of 1998) is applicable to the proposed development. It is further noted that an application for either a water use license ("WUL") or a general authorisation ("GA") will be submitted once a decision has been taken on the application for environmental authorisation. Please be advised that confirmation of the process to be followed must be obtained and be included in the FSR or Draft EIA Report. Further note that comment from the relevant water use authority must be included in the Draft EIA Report.</p>	<p>It is noted that the aquatic assessment found aquatic resources within the project area and thus a Water Use Authorisation (at least in terms of Section 21c and 21i) will be required. As per the protocol for all projects under the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), the submission of the Water Use License Application to the Department of Water and Sanitation is contingent upon the project securing "Preferred Bidder" status. Details on the process to be followed for the application of the Water Use Authorisation will be included in the Draft EIA report. Comments from the Department of Water and Sanitation will be included in the Draft EIA report if received.</p>
	Draft Scoping Phase	<p>It is recommended that a Maintenance Management Plan be prepared for potential maintenance activities that may be required in future for the affected watercourses and encroaching structures and/or infrastructure.</p>	<p>This is noted and will be included as a recommendation in the EMPr.</p>
	Draft Scoping Phase	<p>It is unclear whether the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation ("the Protocols") published in Government Gazette<sup>1</sup> have been complied with as no information was included in the DSR (although indicated in the relevant scoping specialist studies). If this requirement has been met, this must be indicated, and clarity must be provided</p>	<p>All motivations for exclusion of studies are contained in the FSR and all exclusions relate to low sensitivity ratings from the screening tool (Table 4-1).</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		whether the competent authority agreed with the findings of the Site Sensitivity Verification Report.	
	Draft Scoping Phase	<p>Comment from, but not limited to, the following authorities must be obtained and included in the FSR:</p> <ul style="list-style-type: none"> <li>• Department of Agriculture</li> <li>• Department of Water and Sanitation (“DWS”) / Breede-Olifants Catchment Management Agency</li> <li>• Heritage Western Cape</li> <li>• Department of Infrastructure (Roads Branch)</li> <li>• CapeNature</li> <li>• Civil Aviation Authority</li> <li>• Langeberg Municipality</li> </ul>	<p>Key Provincial Authorities were included in the PPP and provided with the DSR summary and access to the full DSR documentation, which also included a map depicting the project area and relevant geographical areas. The key provincial authorities included:</p> <p><b>Comments Received</b></p> <ul style="list-style-type: none"> <li>• Heritage Western Cape (HWC).</li> <li>• Western Cape Department of Environmental Affairs and Development Planning (DEA&amp;DP).</li> <li>• Western Cape Department of Agriculture, Land Reform &amp; Rural Development.</li> <li>• CapeNature.</li> <li>• Civil Aviation Authority.</li> </ul> <p><b>No Comments Received</b></p> <ul style="list-style-type: none"> <li>• Western Cape Department of Economic Development and Tourism.</li> <li>• Western Cape Department of Roads and Public Works.</li> <li>• Western Cape Economic Development and Tourism</li> <li>• Western Cape Government: Department of Transport and Public Works.</li> </ul>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	It is expected that the proposed wind turbines will be micro-sited during the EIR phase to avoid any no-go, very high and high sensitivity areas, and to address constraints identified by the various specialists.	This is correct.
	Draft Scoping Phase	According to the Animal Species Specialist Scoping Report compiled by ERM dated 29 November 2023, camera traps detected and recorded the endangered Riverine Rabbit within the proposed development area. The position of the camera trap locations (Figure 3) should be superimposed on the proposed layout plan to indicate whether any of the proposed wind turbines or associated infrastructure/structures are located near or within Riverine Rabbit habitat. No wind turbines, associated infrastructure or structures should be allowed near of within this species' habitat.	A layout map reflecting the positions of the camera traps has been developed and included in the Appendices under Volume I of the FSR.
	Draft Scoping Phase	The specialist assessments and the Draft EIA Report must provide a map and an assessment of cumulative impacts for all renewable energy projects within at least a 30km radius of the proposed site. The cumulative assessment must also assess both the impacts of the proposed Khoe and Hugo wind energy facilities ("WEFs").	Four (4) renewable energy developments have been approved within 30 km of the proposed development area, all of which being solar photovoltaic (PV) developments. The existing 44 MW Touwsrivier CPV Solar Project is situated on 190 ha to the northeast of the proposed WEF development. Please refer to Appendix X in the FSR, depicting location of the existing Touwsrivier CPV Solar and proposed 110MW Ezelsjacht solar PV

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
			<p>facility proposed on Portion 6 of the Farm Ratelbosch No. 149, De Doorns.</p> <p>A map of the approved renewable energy projects within 30km of the proposed development will be included in the Draft EIA report.</p> <p>A preliminary assessment of cumulative impacts has been made in the FSR and will be assessed further in the EIA Phase.</p>
	Draft Scoping Phase	<p>Please further ensure that the specialist assessments include a cumulative assessment of the same renewable energy projects. For example, the Animal Species Specialist Scoping Report refers to 4 solar photovoltaic ("PV") developments within 30km of the proposed development area, whereas the Heritage Scoping Report compiled by The Energy Team (Pty) Ltd dated 23 November 2023 refers to two approved solar PV developments and 1 WEF within 30km of the proposed site. It is recommended that the EAP provide all the specialists with the latest information on the approved and proposed renewable energy facilities to ensure consistency. Kindly also be informed of the proposed 110MW Ezelsjacht solar PV facility proposed on Portion 6 of the Farm Ratelbosch No. 149, De Doorns. This application is at the FSR stage.</p>	<p>All Specialists have been provided with the Screening Tool Report. As per the Screening Tool Report, a total of 4 approved renewable energy projects are located within 30km of the proposed development. This has been noted and accounted for in the specialist assessments.</p>
	Draft Scoping Phase	<p>It is noted that several solar (concentrating and PV) facilities are approved and proposed within 30km radius of the proposed site. The section on alternatives (section 6) does not indicate why the applicant has opted for wind energy as opposed to solar energy. It is recommended that the forthcoming Draft EIA Report</p>	<p>A motivation as to why a wind energy facility as opposed to a solar energy facility is preferred will be included in the Draft EIA report as recommended.</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		provide a description why the WEF is the preferred renewable energy technology alternative.	
	Draft Scoping Phase	In terms of the environmental legal framework (section 3) and policies in support of renewable energy (section 8.2), please add the National Climate Change Response White Paper (2011) as well the Western Cape Climate Change Response Strategy: Vision 2050 (2022). This Strategy can be downloaded from <a href="https://www.westerncape.gov.za/assets/departments/environmentalaffairsdevelopment-planning/wcccrs_vision_2050_march_2022.pdf">https://www.westerncape.gov.za/assets/departments/environmentalaffairsdevelopment-planning/wcccrs_vision_2050_march_2022.pdf</a> .	The FSR has been updated, referencing the mentioned policies.
	Draft Scoping Phase	It is further recommended that the FSR and/or Draft EIA Report indicate how the proposed development aligns with the emerging long-term plan of the Integrated Resource Plan (2019).	This is noted and will be included in the Draft EIA.
	Draft Scoping Phase	It is noted that the proposal triggers section 38(1) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) and that a Notification of Intent to develop ("NID") has been submitted to Heritage Western Cape ("HWC") on 24 November 2023. Ideally, comment from HWC on the NID should have been obtained prior to release of the DSR as their comments would inform the relevant heritage related specialist studies to be undertaken during the EIR phase. It is however recognised that all the relevant heritage (including visual) related aspects have been considered for further impact assessment.	According to HWC, a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA needs to be undertaken. Furthermore, HWC included a list of activities/recommendations that would need to be considered during the HIA.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	It is not clear from the ToR for the EIR phase Aquatic Impact Assessment that a Risk Assessment Matrix will be undertaken to determine whether the proposed water uses can be authorised via a WUL or GA. This should ideally be included in the ToR for the specialist appointment.	A Risk Assessment Matrix will be undertaken and submitted to the Department of Water and Sanitation as part of a separate process (not part of the EIA process), possibly once the application obtains preferred bidder status.
	Draft Scoping Phase	Cross referencing "Error! Reference source not found" throughout the DSR must be corrected.	Cross referencing updated in FSR.
	Draft Scoping Phase	The Executive Summary indicates that a waste management license ("WML") may be required; however, the DSR does not allude to this. It is assumed that no WML is required.	Given the proposed project description, a WML is not required.
	Draft Scoping Phase	The Executive Summary states that the proposed site is located approximately 48.9km southeast of De Doorns. This is contradictory to the DSR which refers to 20km.	The site is located 20km northwest of De Doorns, FSR updated accordingly.
	Draft Scoping Phase	The Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009) (section 3.12) is not applicable to the project.	This is noted. The FSR has been updated to reflect this.
	Draft Scoping Phase	The DSR indicates that portable sanitation facilities will be used during the construction phase, but it is unclear what ablution facilities will be used during the operational phase.	To be assessed further during the EIA phase of the project.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	Page 48 of the DSR refers to a Table 5, but said table was not included in the DSR.	Reference to Table 5 has been removed from the FSR.
	Draft Scoping Phase	It is mentioned on page 81 of the DSR that water requirements for the proposed development may be sourced from the landowner’s existing boreholes on the site or from new boreholes that will be drilled. Details such as depth to groundwater, location of the borehole and water right allocation should be furnished in the Draft EIA Report for these existing borehole/s.	Borehole details of the existing boreholes on site will be included in the Draft EIA Report.
	Draft Scoping Phase	This Directorate supports the Plan of study for EIA and the proposed specialist studies, particularly the Freshwater Impact Assessment to be undertaken, for the identification of sensitive areas to be avoided and the determination of the respective buffers for each identified aspect. This Directorate will provide further comment on the Draft EIA Report and EMPr.	Thank you, this comment is acknowledged.
	Draft Scoping Phase	This Directorate is satisfied with the specialist studies proposed in the Plan of Study for EIA. Detailed comments will be provided when the Draft EIA Report is released for comments.	Thank you, this comment is acknowledged.
	Draft Scoping Phase	The Noise Report for Site Sensitivity Verification and Scoping Purposes compiled by Enviro-Acoustic Research cc dated November 2023 lists the applicable legislation pertaining to noise, including the Western Cape Noise Control Regulations (“WCNCR”) promulgated in Provincial Notice 200/2013. Please be advised that in terms of assessing possible impacts from new	This is noted and will be implemented accordingly.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		developments, EIAs, and related applications in the Western Cape Province, the WCNCR (2013) should be used as the benchmark for noise assessments.	
	Draft Scoping Phase	This Directorate has no further comments on the DSR and awaits the Draft EIA Report for further comments.	Thank you, this comment is acknowledged.
	Draft Scoping Phase	Please note that this Directorate has a dedicated email address reserved for all EIA related correspondences (DEADP.AQM@westerncape.gov.za). Kindly use this email address for any future correspondence.	This is noted and will be implemented accordingly. Details have also been added to I&AP database.
	Draft Scoping Phase	Please note that the abovementioned recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by this Directorate should in no way be regarded as an indication or confirmation that additional information or documents will not be requested.	Thank you, this comment is acknowledged.

**TABLE 5-3 REPOSES TO COMMENTS FROM DEPARTMENT OF AGRICULTURE**

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>01 March 2024</b></p> <p><b>Email</b></p> <p><b>Department of Agriculture (Brandon Layman)</b></p>	<p>Draft Scoping Phase</p>	<p>Hi Sadiya Salie</p> <p>Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General.</p> <p>The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that.</p> <p>As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy.</p> <p>The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network.</p> <p>CD or USB we can still put on a physical file.</p> <p>With many thanks and kind regards</p> <p>Brandon Layman</p>	<p>Hi Brandon,</p> <p>We have sent a USB, containing both Hugo and Khoe Draft Scoping Reports to the Department last week.</p> <p>Kindly confirm if you have received the USB.</p> <p>Kind Regards Sadiya</p>

**TABLE 5-4 REPOSES TO COMMENTS FROM ESKOM**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>04 March 2024</b></p> <p><b>Email</b></p> <p><b>Eskom (Khululwa Gaongalelwe)</b></p>	<p>Draft Scoping Phase</p>	<p>Dear Sadiya</p> <p>Kindly share kmz files for this project so that we may check if Eskom infrastructure is affected.</p> <p>Thank you.</p> <p>Warm regards Khululwa</p>	<p>Hi Khululwa,</p> <p>Please see attached KMZ, as requested.</p> <p>Kind Regards, Sadiya</p>
<p><b>05 March 2024</b></p> <p><b>Email</b></p> <p><b>Eskom (Khululwa Gaongalelwe)</b></p>	<p>Draft Scoping Phase</p>	<p>Dear Sadiya</p> <p>Thank you, your project does not affect Transmission Eskom lines. We responded to you on the 22 January 2023.</p> <p>Thank you</p> <p>Warm regards Khululwa</p>	

TABLE 5-5 REPONSES TO COMMENTS FROM AGRISA

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>05 March 2024</b></p> <p><b>Email</b></p> <p><b>Agrisa (Thea Liebenberg)</b></p>	<p>Draft Scoping Phase</p>	<p>Good morning Please send notifications of this nature to janse@agrisa.co.za</p> <p>Kind regards</p> <p>Thea Liebenberg Media Administrator</p>	<p>Dear Stakeholder, This email serves to inform you about the resubmission of the Environmental Application and the Draft Scoping Report for the proposed Hugo Wind Energy Facility and associated infrastructure near De Doorns in the Western Cape Province.</p> <p>All comments received during the previous public participation period noted above will still be considered valid, and will form part of the updated Comments and Responses Report.</p> <p>Stakeholders are re-invited to provide comments on the Draft Scoping Report by responding to this email between 29 February and 02 April 2024. More information on how you are able to participate in this process is attached in the above documentation.</p> <p>Thank you, Kind Regards</p>

**TABLE 5-6 REPOSES TO COMMENTS FROM DIRECTLY AFFECTED LANDOWNER**

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>05 March 2024</b></p> <p><b>Email</b></p> <p><b>Landowner (Dirk Uys)</b></p>	<p>Draft Scoping Phase</p>	<p>Dear Sadiya Salie,</p> <p>Thank you for your letter on the resubmission and please note that my position stays the same as described in my letter to you of 24/01/2024.</p> <p>My appreciation and thank you for the good work done.</p> <p>Kind regards.</p> <p>Dirk Uys</p>	<p>Thank you,</p> <p>Kind Regards Sadiya</p>

**TABLE 5-7 REPOSES TO COMMENTS FROM DEPARTMENT FORESTRY, FISHERIES AND ENVIRONMENT – BIODIVERSITY AND CONSERVATION (THE COMPETENT AUTHORITY FOR ENVIRONMENTAL AUTHORISATION)**

Date of comment, format of comment, name of organisation /	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>05 March 2024</b></p> <p><b>Email</b></p> <p>Department Forestry, Fisheries and the Environment (DFFE) - Biodiversity and</p>	<p>Draft Scoping Phase</p>	<p>Good day</p> <p>Kindly note that comments received from the Directorate: Biodiversity Conservation still stands.</p> <p>Tebego Kgaphola</p>	<p>Thank you,</p> <p>Kind Regards Sadiya</p>



Conservation (Tebego Kgaphola)			
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**TABLE 5-8 REPNSES TO COMMENTS FROM CAPE NATURE**

<b>Date of comment, format of comment, name of organisation /</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<b>27 March 2024</b>  <b>Email</b>  <b>Cape Nature</b> <b>(Rhett Smart)</b>	Draft Scoping Phase	<p>Dear Sadiya</p> <p>Can you please confirm whether the Draft Scoping Report and appendices are exactly the same as the previous Draft Scoping Report and appendices dated December 2023 which we commented on? I also wish to ask the same question regarding the proposed Khoe Wind Energy Facility application which has the same timeframes.</p> <p>Regards</p> <p>Rhett</p>	<p>Morning Rhett,</p> <p>Thank you for your email.</p> <p>Please note that the Draft Scoping Report and Appendices for both the Hugo and Khoe Wind Energy Facilities were slightly amended (where applicable) based on the comments received during the January 2024 public comment period.</p> <p>Kind regards, Khosi</p>

Date of comment, format of comment, name of organization /	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<b>04 April 2024</b>  <b>Email</b>  <b>Cape Nature (Rhett Smart)</b>	Draft Scoping Phase	CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.	
	Draft Scoping Phase	CapeNature provided comment on the previous application for the proposed wind energy facility (WEF) on 7 February 2024 which has since lapsed. The project proposal has not changed from the previous application. and neither have the specialist studies. The previous comments therefore remain relevant and must be referred to. Minor amendments have been made to the Scoping Report in the sections related to the Screening Tool and legislation.	
	Draft Scoping Phase	Table 4.1 of the Scoping Report has been updated to not only reflect the rating from the Screening Tool, but also the site sensitivity verification by the specialists, as is required in the Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (GN 320, GG 43110, March 2020). Full assessments are proposed for each of the ecological themes, namely: terrestrial biodiversity; aquatic biodiversity; plant species; animal species; avifauna (wind); and bats (wind). This includes themes which were rated as low sensitivity in the Screening Tool such as avifauna (wind). Therefore, the site sensitivity verification was not previously interrogated as sufficient information would be available to make an informed decision provided the specialist assessments are adequate.	
	Draft Scoping Phase	Although the outcome from the site sensitivity verification is supported (i.e. specialist assessments for all themes) we wish to note the following in Table 4.1:	

Date of comment, format of comment, name of organization /	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	For terrestrial biodiversity the table states that the specialist verified the sensitivity as medium, however the conclusion of the specialist assessment states that the Screening Tool rating of very high sensitivity is correct.	We observe the conflicting assessments between the Screening Tool’s sensitivity rating and the concluding specialist sensitivity rating. EAP to amend the specialist sensitivity rating in the Scoping Report to reflect the sensitivity rating of the Specialist.
	Draft Scoping Phase	We also note that Figure 6 of the terrestrial biodiversity assessment indicating the screening tool sensitivity includes a map for the plant species theme as opposed to the terrestrial biodiversity theme.	Biodiversity is dominated by plant species found on site. Thus, the plant species sensitivity has been used as a proxy for biodiversity sensitivity.
	Draft Scoping Phase	The site ecological importance (SEI) has been presented as the site sensitivity verification. However, the SEI differs from the site sensitivity verification as described in the Species Environmental Assessment Guidelines (SANBI 2020). The site sensitivity verification aims to identify features which are not represented in the Screening Tool and changes in land use, whereas the SEI should be undertaken as part of the assessment.	Noted. The heading of Figure 6 has been amended in the Terrestrial Biodiversity Scoping Report to reflect that it shows site ecological importance instead of site sensitivity. The sub-heading of section 3.5 has also been amended from Site Sensitivity to Site Ecological Importance.

Date of comment, format of comment, name of organization /	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	The table states that the specialist sensitivity rating for aquatic biodiversity is low whereas the rating in the Screening Tool rating is very high. However, the specialist report rates the wetlands and a 60 m buffer as high and very high sensitivity, and these areas are included within the study area. The aquatic biodiversity assessment indicates that the impact rating after mitigation is low, however this differs from the site sensitivity verification which is required at the initiation of the specialist study.	The impact ratings are based on the fact that the aquatic features will be avoided as best possible, thus low impacts, as the area is sensitive as shown in the Screening Tool, but not with regard to biodiversity but with regard hydrology. Hydrological impacts are easily mitigated
	Draft Scoping Phase	<p>Although only a small patch of the study area is rated as high sensitivity for the plant species theme, the Screening Tool results reflect the highest sensitivity recorded within the study area. Therefore, it should not be reflected as medium sensitivity in the table.</p> <p>The SEI is however presented as the site sensitivity verification (see discussion above regarding SEI vs site sensitivity).</p>	<p>To be updated by the EAP in the Scoping Report to reflect the ST's High sensitivity rating.</p> <p>Sensitivity rating of the ST has been amended in the Botanical Scoping report.</p> <p>Noted. The heading of Figure 6 has been amended in the Botanical Scoping Report to reflect that it shows site ecological importance instead of site sensitivity. The sub-heading of section 3.4 has also been amended from Site Sensitivity to Site Ecological Importance.</p>

Date of comment, format of comment, name of organization /	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	The high sensitivity species for the animal species theme are the birds which are covered in the avifaunal assessment. The SEI for the three key species identified in the animal species assessment has been presented as the sensitivity (see discussion above regarding SEI vs site sensitivity).	The Site Ecological Importance is what we have been assessing for all birds (not just the three identified by the DFFE site screening tool (Black Harrier, Verreaux's Eagle, Southern Black Korhaan). We have undertaken the avian analysis based on data on 16 species, of which we modelled the fatality risk for 6 species. We then compared what the DFFE Screening Tool gave as the sensitivity for the area (High) based on birds.
	Draft Scoping Phase	The avifaunal assessment refers to the Screening Tool rating of high sensitivity, however the avifauna (wind) theme rating is low sensitivity. It is assumed that the assessment is referring to the results from the animal species theme, however as mentioned above, the species flagged as high sensitivity were all birds. The discrepancy lies with the results from the Screening Tool.	The avian (wind) theme only considers vulture colonies within 1km, with no other collision prone species being considered. The Screening Tool rating has been updated to reflect high sensitivity – taking into account results animal species theme.
	Draft Scoping Phase	It is noted that the bat sensitivity will be verified once the monitoring data is complete. We wish to note that the key habitats form the basis for the bat (wind) theme and should therefore be the basis for the site sensitivity verification.	Noted – key habitats to form basis for site verification

Date of comment, format of comment, name of organisation /	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	The legislation section has been updated to include the Western Cape Biodiversity Act which is supported.	
	Draft Scoping Phase	CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.	

**TABLE 5-9 REPONSES TO COMMENTS FROM DEPARTMENT FORESTRY, FISHERIES AND ENVIRONMENT (THE COMPETENT AUTHORITY FOR ENVIRONMENTAL AUTHORISATION)**

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
<p><b>27 March 2024</b></p> <p><b>Letter, received via email</b></p> <p><b>Department Forestry, Fisheries and the Environment (DFFE) (Lydia Kutu, Sabelo Malaza)</b></p>	1. Listed Activities	
	<p>a) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. The physical footprint of the infrastructure in square metres must be provided in support of the applicability of this listed activity/ies.</p>	<p>All relevant listed activities have been included in the FSR (see Section 3.2) and have been included into the Application Form. The applicable footprints have also been included accordingly.</p>
	<p>b) Ensure to include thresholds for each activity applied for in the application form. The physical footprint of the infrastructure in square metres/hectares/cubic metres is not mentioned in the application form. As such, you are requested to provide the</p>	<p>The EAP has highlighted the applicable listed activities triggered by the proposed development by indicating the thresholds which have been met. It is important to note, however, that at this stage of the project, the</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>physical footprint of the infrastructure to motivate the applicability of this listed activity/ies.</p>	<p>exact physical footprint of the proposed infrastructure has not yet been finalized. However, at this stage the legislated thresholds have been listed in the application form and FSR as applicable, and this has been indicated as such.</p> <p>Furthermore, buffer zones have been updated, resulting in four turbines being located within Arterial and main roads buffer of the R318.</p>
	<p>c) You are required to confirm whether the competent authority adopts systematic biodiversity plans or bioregional plans. There are certain activities in Listing Notice 3 that requires that systematic biodiversity plans adopted by the competent authority or in bioregional plans.</p>	<p>It has been confirmed by the Western Cape Department of Environmental Affairs and Development planning (DEADP) through a letter received during the DSR public comment period that, no bioregional plans have been developed for the Western Cape province.</p>
	<p>d) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property falls within geographically designated areas in terms of Listing Notice 3 Activities i.e. Critical Biodiversity Areas. Written comments must be obtained from the relevant provincial authority (or proof of consultation if no comments were received) and submitted to this Department.</p>	<p>Key Provincial Authorities were included in the PPP and provided with access to the full DSR documentation, which also included a map depicting the project area and relevant geographical areas. The key provincial authorities included:</p> <p><b>Comments Received</b> Heritage Western Cape (HWC). Western Cape Department of Environmental Affairs and Development Planning (DEA&amp;DP). Western Cape Department of Agriculture. South Africa Civil Aviation Authority</p> <p><b>No Comments Received</b> Western Cape Department of Agriculture, Land Reform &amp; Rural Development.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		<p>Western Cape Department of Economic Development and Tourism.                      Western Cape Department of Roads and Public Works.                      Western Cape Economic Development and Tourism                      Western Cape Government: Department of Roads and Public Works.                      Western Cape Government: Department of Transport and Public Works.</p> <p>Proof of consultation has been attached as an Appendix to the FSR.</p>
	<p>e) Only applicable listed activities must be applied for, and the project description must be specific on what is being proposed in the final EIAR.</p>	<p>Refer to Section 3.2 of the FSR where it describes how the listed activities applied for are linked to the project description.</p>
	<p>f) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports. Provide this information as well as the coordinates of the proposed development in a separate appendix.</p>	<p>ERM confirms that the SG codes, all farm names, and numbers included in the Application Form and FSR are correct. The SG codes and coordinates have been included as an appendix to the FSR.</p>
	<p>g) Include the GPS Coordinates for the onsite substation and battery energy storage system (BESS) facility. Coordinates must be in the format as prescribed in the 2014 NEMA EIA Regulations, as amended.</p>	<p>ERM confirms that the coordinates for the BESS Substation and onsite substation have been included in Table 0.5 of the FSR. The BESS will be located within the project area, adjacent to the substations.</p>
	<p>h) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department’s application form template has been amended and can be downloaded from the following link  <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a> .</p>	<p>The activities listed in the Application Form and FSR do not differ. However, there was a repetition of Activity 4 of Listing Notice 3 in the Application Form as noted by the DFFE. This repetition has been removed. The amended Application Form will be submitted to the DFFE with the FSR.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>2. Layout and Sensitivity Maps All available biodiversity information must be used in the finalisation of the final layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:</p> <ul style="list-style-type: none"> <li>i. Ensure that the titles of the maps are consistent. The preferred layout must be presented in the final layout map.</li> <li>ii. The envisioned area for the wind facility, i.e. final location of turbines and all associated infrastructure including BESS, should be mapped at an appropriate scale.</li> <li>iii. All supporting onsite infrastructure such as laydown areas, guard house, BESS, control room, and buildings, including accommodation etc.</li> <li>iv. All necessary details regarding all locations and sizes of the substations and internal power lines.</li> <li>v. All existing infrastructure on the site, especially internal road infrastructure.</li> </ul>	<p>A preliminary layout map detailing the proposed layout of the facility has been included Section 1 – Figure 1.2 of the FSR. It must be noted however, that a final layout plan can only be provided once all specialist assessments have been completed during the EIA phase.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>vi. Please provide an environmental sensitivity map, if possible, which indicates the following:</p> <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;</li> <li>• Sensitivity Buffer areas; and All “no-go” areas.</li> </ul>	<p>An Environmental Sensitivity map, which includes all sensitive environmental features as recommended, as well as sensitivity buffer areas (no-go) has been included Appendix A to Volume I of the FSR. It is also included in Figure 11-12 of the FSR.</p> <p>It should be noted that the bat sensitivity map was produced during the bat scoping phase and although this provides an idea of the sensitivities, the studies are not yet complete. These maps will only be finalised in the final bat monitoring report (during the EIA phase) when all the data has been collected and analysed.</p>
	<p>a) It must be emphasized that the final EIAR must include a final layout map which adheres to specialist recommendations as well as the identified no-go areas and buffer zones. All turbines must be numbered on all submitted maps.</p>	<p>A final layout map will be produced during the EIA, which will adhere to specialist recommendations, no-go areas and buffer zones.</p>
	<p>b) The above site-specific map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>	<p>This will be produced during the EIA phase.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>c) Google maps will not be accepted for decision-making purposes. Ensure that distinct colours are used on the maps to differentiate features, especially on the sensitivity map. In addition, turbines must be numbered for ease of reference.</p>	<p>All maps are generated using Esri ® ArcMap software. No google maps are included in the FSR.</p>
	<p>d) Include a description of the process to determine the finalised layout i.e. specialist considerations, site sensitivities etc.</p>	<p>Detailed studies will be undertaken during the EIA phase, whereby the appointed specialists will conduct detailed impact assessments to evaluate how the proposed turbine locations and associated infrastructure could impact the identified sensitive areas. Based on the recommendations provided by the specialists, the developer will implement seasonal restrictions (e.g. curtailment), buffer zones or possibly change the turbine locations and associated infrastructure, in an attempt to avoid sensitivities identified by specialists. A final layout map will then be developed accordingly.</p>
	<p>e) Section 11.9.2 Visual Sensitivities in the draft Scoping report highlights numerous visual sensitivities and their recommended buffers. The turbines occurring within these buffers must be either micro-sited as far as possible or motivated for.</p>	<p>Repositioning of the turbines will affect the forecasted output capacity, and that the turbines are where they are based on the wind source in those areas. Implementing the 1km road buffer will cause that the project to not be viable as we will be losing 11-12 turbines by just that buffer on the Khoe project. On the Hugo project it will have less of an effect but would also be a problem. That specific mountain area on Khoe is also the area with the best wind resource and would have a big influence on production.</p> <p>Furthermore, buffer zones have been updated, resulting in two turbines being located within Arterial and main roads buffer of the R318.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>3. Public Participation Process</p> <p>a) Please ensure that all issues raised, and comments received on the draft SR from registered I&amp;APs and organs of state which have jurisdiction. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning, the Department of Agriculture, Forestry and Fisheries (DAFF), the provincial Department of Agriculture, the South African Civil Aviation Authority (SACAA), the Department of Transport, the Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African National Roads Agency Limited (SANRAL), the South African Heritage Resources Agency (SAHRA), Dr Samantha Mynhardt And Esther Matthew of the EWT’s Drylands Conservation Programme of the Endangered Wildlife Trust (EWT), BirdLife SA, CapeNature, the Cape Leopard Trust, the Department of Mineral Resources, the Department of Rural Development and Land Reform, the Square Kilometre Array (SKA) and the Department of Environmental Affairs: Directorate Biodiversity and Conservation and Protected Areas. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</p> <p>b) The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40, 41, 42, 43 &amp; 44 of the NEMA EIA Regulations 2014, as amended.</p>	<p>All comments and issues raised are addressed in this CRR.</p> <p>Copies of comments from and communication with authorities, stakeholders, and I&amp;APs, including written notice of availability of the DSR for comment, and reminders to submit comments before the closing date, are included Volume III of the FSR:</p> <ul style="list-style-type: none"> <li>• Proof of Site Notice;</li> <li>• Proof of Advert;</li> <li>• Proof of Stakeholder Consultation (Emails)</li> <li>• Comments received proof; and</li> <li>• Comments and Reponses Report..</li> </ul> <p>Scoping Phase PPP has been conducted in accordance with these requirements (refer to Section 5.4 of the FSR). EIA Phase PPP will also be undertaken in</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>c) A comments and response trail report (C&amp;R) must be submitted with the final SR. The C&amp;R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully and in chronological order. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p>	<p>conformance with these requirements.</p> <p>The C&amp;R report has been included in Volume III of the FSR.</p>
	<p>4. Specialist Assessments to be conducted in the EIA Phase</p>	
	<p>a) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p>	<p>Specialist methodologies are provided under Section 4.2 of the FSR and Volume II of the FSR which contain the full specialist assessments, including detailed descriptions of their methodologies followed and recommendations.</p>
	<p>b) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p>	<p>Refer to volume II of the FSR which contains the full specialist assessments, including the limitations and assumptions underpinning the assessments.</p>
	<p>c) It is further brought to your attention that Procedures 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,</p>	<p>All specialist assessments for the proposed Wind Energy Facility have been completed in accordance with the applicable protocols</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists’ to be registered with SACNASP in their respective field.</p>	<p>Appointed specialists are also SACNASP registered in their respective fields.</p>
	<p>d) Please include a table in the report, summarising the specialist studies required by the Department’s Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists’ studies and requirements/protocols recommended in the Department’s Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.</p>	<p>Table 4-1 in the FSR summarises the specialist studies required by the Department’s screening tool, as well as those studies which have been excluded, including a motivation as to why they were excluded. All exclusions relate to low sensitivity ratings from the screening tool.</p>
	<p>e) The screening tool output:</p> <ul style="list-style-type: none"> <li>• The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</li> <li>• Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.</li> <li>• It is the responsibility of the EAP to confirm the list of specialist assessments provided by the screening tool and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of</li> </ul>	<p>Site sensitivity verifications were undertaken by the applicable specialists and have been included in Volume II of the FSR, within the specialist assessments. Table 4-1 in the FSR also details a summary of the site sensitivity verification in relation to the screening tool.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached. If the findings of the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.</p>	
	<p>f) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>This has been noted. No contradicting recommendations have been made by the specialists at this point.</p>
	<p>g) Confirm whether the applicant is considering offsets in terms of Riverine Rabbit or any other ecological feature. The Animal Specialist report recommends on page 15 of the report: 'Establishment of stewardship programme to research and conserve Riverine Rabbit, following appropriate Biodiversity Offset Guidelines'. Ensure that the specialist report, adequately addresses the issue of offsets, should they be required. The offset plan produced must take cognisance of the Draft National Biodiversity Offset Guideline (25 March 2022) and must include stakeholder engagement, definitive goals, timeframes, responsibilities, and management requirements. It must also include a monitoring and reporting plan to assess the effectiveness of the offset. Note that if offsets are pursued, a finalised offset plan must be presented by the final EIAR.</p>	<p>No offsets will be required, however, a research and stewardship programme to protect the riverine rabbit following the offset guidelines needs to be developed.</p> <p>It is a requirement to do more studies during the EIA phase on the Riverine Rabbit to confirm if offsets are required or not, and only if such are required, then additional offset measures will be put forward. As it was indicated by the Animal specialist, the WEF "is unlikely to have a significant negative impact on the long-term viability and persistence of animal SCCs in the area following the implementation of available mitigation measures. Large portions of the proposed development area are modified by agricultural activity, presenting an opportunity to improve habitat availability and local habitat connectivity through rehabilitation and restoration of strategic areas".</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		<p>Upon understanding the distribution of the rabbits better during studies of the EIA phase, it is highly likely that opportunities for improving habitat condition and - connectivity for this species will be identified, and future research needs and best management practices can then be incorporated into a biodiversity management plan, which will form the basis of the research and stewardship programme. The reason why this programme needs to follow the offset guidelines, even if no offset as such may be required, is to ensure that a standardised method of collecting data on and protecting highly threatened species is applied across the country, allowing for results that can be monitored, verified, and feed into any provincial and/or national conservation plan.</p>
	<p>5. Cumulative Assessment to be conducted in the EIA Phase Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p>	
	<p>i. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</p>	<p>Four renewable energy developments have been approved within 30 km of the proposed development area, all of which being solar photovoltaic (PV) developments. The existing 44 MW Touwsrivier CPV Solar Project is situated on 190 ha to the northeast of the proposed WEF development. Solar PV developments generally require the clearance of large areas for the solar arrays, particularly in flatter low-lying areas utilized by species such as Riverine Rabbit. The only similar project within the 35km radius of the proposed development site is the Hugo WEF, which is by the same developer as Khoe. The proposed WEF development is</p>
	<p>ii. Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p>	



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	iii. The cumulative impacts significance rating must also inform the need and desirability of the proposed development.	largely focused on elevated hilltops, allowing for a reduced impact on low-lying habitats.
	iv. A cumulative impact environmental statement on whether the proposed development must proceed.	A preliminary assessment of cumulative impacts has been made in the Scoping Phase and will be assessed further in the EIA Phase where a detailed process flow and methodology will be defined as recommended
	6. Environmental Management Programme The EMPr must include the following:	
	i. It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, must be signed and submitted with the final report over and above the EMPr for the facility.	Since Activity 11 of Listing Notice 1 is triggered, a generic Environmental Management programme will be signed by the EAP and submitted with the final EIA report over and above the EMPr for the facility as required. The EMPr will comply with the terms of Appendix 4 of the EIA Regulations, 2014, as amended.  The facility EMPr will include and or consider, where applicable and necessary, all the listed management plans and mitigation measures as listed / suggested. Should any of the listed management plans not be included in the EMPr, a motivation will be provided by the EAP as to why this is the case.
	ii. Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.	
	iii. Should the applicant consider blade painting as a mitigation measure, as mentioned in the Avian Specialist report, this must be assessed in the report and included in the EMPr.	
	a) The EMPr must consider the following, and where possible,	

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	<p>include:</p> <ul style="list-style-type: none"> <li data-bbox="450 480 1346 667">i. An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.</li> <li data-bbox="450 667 1346 890">ii. A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</li> <li data-bbox="450 890 1346 1050">iii. An avifauna monitoring and management plan to be implemented during the construction and operation of the facility. A suitably qualified avifauna specialist must draft this plan.</li> <li data-bbox="450 1050 1346 1273">iv. A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must 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.</li> <li data-bbox="450 1273 1346 1359">v. An open space management plan to be implemented during the construction and operation of the facility.</li> </ul>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>vi. A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.</p>	
	<p>vii. A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment.</p>	
	<p>viii. A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.</p>	
	<p>ix. A fire management plan to be implemented during the construction and operation of the facility.</p>	
	<p>x. An erosion management plan for monitoring and rehabilitating erosion events associated with the facility.</p>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.</p> <p>xi. An effective monitoring system to detect any leakage or spillage of all 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.</p> <p>xii. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</p> <p>b) The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.</p>	
	<p>General</p> <p>Please take note of GNR 4143, which was gazetted on the 04 December 2023, which requires a letter of consent from Eskom Holdings SOC Ltd if the proposed development is within a specific radius of a main electricity transmission or distribution substation. Should this gazette apply to the proposed development, please ensure the necessary documents are included.</p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: "If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent</p>	<p>According to the response received from Eskom Holdings SOC Ltd on the 22 January 2023, Eskom Transmission lines will not be affected by the proposed development. This correspondence has been included in Volume III of the FSR.</p> <p>The FSR has been submitted to the competent authority within 44 days of the application having been received by the competent authority. This FSR also reflects</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	authority, submit to the competent authority a SR which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.	comments received during the 30-day comment period, including comments from the competent authority.
	You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.	Refer to Section 2- Table 2.1 in the FSR. The Table presents compliance with the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.
	Further note that in terms of Regulation 45 of the NEMA EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).	This is noted. Timeframes stipulated have been adhered to in this application process.
	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	The Applicant / EAP takes note of this and confirms that no activity has / will commence without an environmental authorisation.

**TABLE 5-10 REPNSES TO COMMENTS FROM I&AP**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>07 March 2024</b></p> <p><b>Email</b></p> <p><b>I&amp;AP (Graham Abrahams)</b></p>	<p>Draft Scoping Phase</p>	<p>Dear Sadiye and Khosi</p> <p>As a point of introduction, I have served as the chairman of Hex River Valley Heritage &amp; Conservation Society (HRVH&amp;CS) - affiliated to Heritage Western Cape, from 2019 until I retired last year, in December 2023. I have also served on several boards in the capacity of Financial Director and New Business Development Director until I retired and moved from Gauteng to the Western Cape in 2018.</p> <p>I now act as a Business Development and Financial Resources adviser to various businesses in the Agri-sector in this region.</p> <p>I currently reside in De Doorns, Western Cape, the town which is in close proximity to the proposed sites for the ERM Hugo &amp; Khoe Wind Energy facilities (WEFs).</p> <p>Since becoming aware of this project I have been following its progress with great interest.</p> <p>I am both familiar and conversant with the principles, prescripts and requirements as stipulated by NEMA (National Environmental Management Act (Act No. 107 of 1998)), pertaining to the Scoping and Environmental Impact Assessment (S&amp;EIA) Process and the I&amp;AP and PPP participation therein. It is in this context that I write this email to you, that is, both in the capacity of the ex-chairman of the society, as well as being a concerned citizen.</p> <p>I have read the Hugo and KHOE WEF documents and Scoping Reports, in particular the documents relating to the Heritage and Environmental Impact studies (Assessment conducted under Section 38 (8) of the National Heritage Resources Act (No. 25 of 1999) as part of an Environmental Impact Assessment), and section 2 that defines the range and extent of what are considered to be South Africa’s heritage resources, being “any place or object of cultural significance”.</p> <p>I am satisfied that the necessary and essential heritage &amp; cultural investigations into these aspects, as relating to the proposed site locations for the erection of the WEF, have been undertaken, completed</p>	<p>Thank you Graham,</p> <p>We will notify you when the Draft Environmental Impact Assessment becomes available for public participation.</p> <p>Kind Regards Sadiya</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>and professionally dealt with, and that the preliminary findings and reports (to date) reveal that the project complies with the statutory and regulatory requirements in this regard.</p> <p>I therefore accept the conclusion on page 2 of the report prepared by Mr John Gribble of TerraMare Archaeology (Pty) Ltd, wherein he states "Although the Hugo WEF is in an area of high to very high palaeontological sensitivity this is not a red flag or fatal flaw and should not constrain the proposed development, provided suitable measures to mitigate any impacts are implemented as part of the development of the WEF."</p> <p>It is therefore incumbent on the senior project managers of the various sites to ensure that they heed the due processes in terms of the ongoing heritage and cultural compliance requirements throughout the erection of the facilities, the commissioning phase and the management of the facilities into the future.</p> <p>Finally, it is very comforting to me, as a member of the public and vested community member in De Doorns, that this project is likely to realise significant job creation, upskilling, upliftment and economic benefit to the local communities for the foreseeable future. I therefore have no reservations but to support this project and look forward to seeing it become a reality.</p> <p>I am available for further discussion and participation in this process.</p> <p>Thanking you,</p> <p>Kind Regards / Vriendelike Groete</p> <p>Graham</p>	

RESPONSES RECEIVED ON THE DSR SUBMITTED ON THE 14 DECEMBER 2023

TABLE 5-11 RESPONSES TO COMMENTS FROM SOUTH AFRICAN CIVIL AVIATION AUTHORITY (SACAA)

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>08 January 2024</b></p> <p><b>Email</b></p> <p><b>South African Civil Aviation Authority (SACAA) (Lizell Stroh)</b></p>	<p>Draft Scoping Phase</p>	<p>The SACAA has transferred the assessments for Solar and Wind energy APPLICATIONS TO Air Traffic and applications to Air Traffic and Navigation Services (ATNS) as published on the SACAA website. A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacle assessment to be conducted. Their responsibility would pertain to the assessments, maintenance, and all other related matters in respect to Solar and Wind Farm assessments.</p>	<p>The developer has been informed regarding the application of obstacle assessment. Please be assured that a formal application will be lodged as part of the pre-construction / planning process, prior to the commencement of construction activities.</p>
<p><b>30 January 2024</b></p> <p><b>Letter, received via email</b></p> <p><b>South African Civil Aviation Authority (SACAA) (Evelyn Shogole)</b></p>	<p>Draft Scoping Phase</p>	<p>We acknowledge receipt of email dated 08 January 2024. The South African Civil Aviation Authority (CAA) is an agency of the Department of Transport (DoT). The Civil Aviation Act 13 of 2009 provides for the establishment of the CAA as a stand-alone authority mandated with controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. The CAA exercises this mandate through the Civil Aviation Regulations (CARs). Please see our comments below:</p> <p>The screening tool indicates that the proposed development has a high sensitivity toward civil aviation which means the project assessment anticipates negative impacts to the aviation infrastructure and activities. The proposed development includes the establishment of wind energy facility and infrastructure, as such there is a need to apply for obstacle approval. The client is required to follow the application procedure and process as published on the SACAA website: <a href="http://www.caa.co.za/industry-information/obstacles/">www.caa.co.za/industry-information/obstacles/</a> . Kindly be advised that Air Traffic and Navigation Services (ATNS) has been appointed as the Obstacle application Service</p>	<p>The developer has been informed regarding the application of obstacle assessment. Please be assured that a formal application will be lodged as part of the pre-construction / planning process, prior to the commencement of construction activities.</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		Provider for Windfarms on 1 May 2021. They will be also responsible for Solar Obstacle Applications from the 1 <sup>st</sup> of February 2022. All new Solar applications must be lodged to obstacles@atns.co.za . Please do not hesitate to contact our office for any clarifications.	

**TABLE 5-12 REPONSES TO COMMENTS FROM HERITAGE WESTERN CAPE (THE COMPETENT AUTHORITY FOR HERITAGE PERMITS IN THE WESTERN CAPE)**

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<b>11 January 2024</b> <b>Letter, received via email Heritage Western Cape (HWC) (Sneha Jhupsee and Stephanie Barnardt)</b>	Draft Scoping Phase	You are hereby notified that, since there is reason to believe that the proposed Hugo wind energy facility on multiple properties between Touwsriver and Montagu will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. Section 38(3) of the NHRA provides (3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): Provided that the following must be included:	Thank you for your comment. This is duly noted. A heritage impact assessment will be undertaken as part of the EIA phase, which will take into account all requirements listed.
	Draft Scoping Phase	a) The identification and mapping of all heritage resources in the area affected	

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	(b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7	
	Draft Scoping Phase	(c) an assessment of the impact of the development on such heritage resources	
	Draft Scoping Phase	(d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development	
	Draft Scoping Phase	(e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources	
	Draft Scoping Phase	(f) if heritage resources will be adversely affected by the proposed development, the consideration of alternatives	
	Draft Scoping Phase	(g) plans for mitigation of any adverse effects during and after the completion of the proposed development	
	Draft Scoping Phase	This HIA must in addition have specific reference to the following <ul style="list-style-type: none"> <li>• Archaeological impact assessment</li> <li>• Palaeontological impact assessment</li> <li>• Visual Impact on the Cultural landscape Assessments</li> </ul>	
	Draft Scoping Phase	The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above.	

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	The required HIA must have an integrated set of recommendations.	
	Draft Scoping Phase	The comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied.	

**TABLE 5-13 REPONSES TO COMMENTS FROM DEPARTMENT FORESTRY, FISHERIES AND ENVIRONMENT (THE COMPETENT AUTHORITY FOR ENVIRONMENTAL AUTHORISATION)**

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
<p><b>26 January 2024</b></p> <p><b>Letter, received via email</b></p> <p><b>Department Forestry, Fisheries and the Environment (DFFE) (Lydia Kutu, Sabelo Malaza)</b></p>	<p>7. Listed Activities</p> <p>i) The application form includes a repetition of Activity 4 of Listing Notice 3, please correct this.</p> <p>j) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. The physical footprint of the infrastructure in square metres must be provided in support of the applicability of this listed</p>	<p>The application form has been updated to remove the repetition.</p> <p>All relevant listed activities have been included in the FSR (see Section 3.2) and have been included into the Application Form. The applicable footprints have also been included accordingly.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	activity/ies.	
	k) Ensure to include thresholds for each activity applied for in the application form. The physical footprint of the infrastructure in square metres/hectares/cubic metres is not mentioned in the application form. As such, you are requested to provide the physical footprint of the infrastructure to motivate the applicability of this listed activity/ies.	The EAP has highlighted the applicable listed activities triggered by the proposed development by indicating the thresholds which have been met. It is important to note, however, that at this stage of the project, the exact physical footprint of the proposed infrastructure has not yet been finalized. However, at this stage the legislated thresholds have been listed in the application form and FSR as applicable, and this has been indicated as such.
	l) You are required to confirm whether the competent authority adopts systematic biodiversity plans or bioregional plans. There are certain activities in Listing Notice 3 that requires that systematic biodiversity plans adopted by the competent authority or in bioregional plans.	It has been confirmed by the Western Cape Department of Environmental Affairs and Development planning (DEADP) through a letter received during the DSR public comment period that, no bioregional plans have been developed for the Western Cape province.
	m) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property falls within geographically designated areas in terms of Listing Notice 3 Activities i.e. Critical Biodiversity Areas. Written comments must be obtained from the relevant provincial authority (or proof of consultation if no comments were received) and submitted to this Department.	<p>Key Provincial Authorities were included in the PPP and provided with access to the full DSR documentation, which also included a map depicting the project area and relevant geographical areas.</p> <p>The key provincial authorities included:</p> <p><b>Comments Received</b></p> <ul style="list-style-type: none"> <li>• Heritage Western Cape (HWC).</li> <li>• Western Cape Department of Environmental Affairs and Development Planning (DEA&amp;DP).</li> <li>• Western Cape Department of Agriculture.</li> <li>• South Africa Civil Aviation Authority</li> </ul>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		<p><b>No Comments Received</b></p> <ul style="list-style-type: none"> <li>• Western Cape Department of Agriculture, Land Reform &amp; Rural Development.</li> <li>• Western Cape Department of Economic Development and Tourism.</li> <li>• Western Cape Department of Roads and Public Works.</li> <li>• Western Cape Economic Development and Tourism</li> <li>• Western Cape Government: Department of Roads and Public Works.</li> <li>• Western Cape Government: Department of Transport and Public Works.</li> </ul> <p>Proof of consultation has been attached as an Appendix to the FSR.</p>
	<p>n) Only applicable listed activities must be applied for, and the project description must be specific on what is being proposed in the final EIAR.</p>	<p>Refer to Section 3.2 of the FSR where it describes how the listed activities applied for are linked to the project description.</p>
	<p>o) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports. Provide this information as well as the coordinates of the proposed development in a separate appendix.</p>	<p>ERM confirms that the SG codes, all farm names, and numbers included in the Application Form and FSR are correct. The SG codes and coordinates have been included as an appendix to the FSR.</p>
	<p>p) Include the GPS Coordinates for the onsite substation and battery energy storage system (BESS) facility. Coordinates must be in the format as prescribed in the 2014 NEMA EIA Regulations, as amended.</p>	<p>ERM confirms that the coordinates for the BESS Substation and onsite substation have been included in Table 0.5 of the FSR. The BESS will be located within the project area, adjacent to the substations.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>q) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department’s application form template has been amended and can be downloaded from the following link  <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a> .</p>	<p>The activities listed in the Application Form and FSR do not differ. However, there was a repetition of Activity 4 of Listing Notice 3 in the Application Form as noted by the DFFE. This repetition has been removed. The amended Application Form will be submitted to the DFFE with the FSR.</p>
	<p><b>8. Layout and Sensitivity Maps</b>                      All available biodiversity information must be used in the finalisation of the final layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:</p>	
	<p>vii. Ensure that the titles of the maps are consistent. The preferred layout must be presented in the final layout map.</p>	<p>A preliminary layout map detailing the proposed layout of the facility has been included Section 1 – Figure 1.2 of the FSR. It must be noted however, that a final layout plan can only be provided once all specialist assessments have been completed during the EIA phase.</p>
	<p>viii. The envisioned area for the wind facility, i.e. final location of turbines and all associated infrastructure including BESS, should be mapped at an appropriate scale.</p>	
	<p>ix. All supporting onsite infrastructure such as laydown areas, guard house, BESS, control room, and buildings, including accommodation etc.</p>	
	<p>x. All necessary details regarding all locations and sizes of the substations and internal power lines.</p>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>xi. All existing infrastructure on the site, especially internal road infrastructure.</p>	
	<p>xii. Please provide an environmental sensitivity map, if possible, which indicates the following:</p> <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;</li> <li>• Sensitivity Buffer areas; and All “no-go” areas.</li> </ul>	<p>An Environmental Sensitivity map, which includes all sensitive environmental features as recommended, as well as sensitivity buffer areas (no-go) has been included Appendix A to Volume I of the FSR. It is also included in Figure 11-12 of the FSR.</p> <p>It should be noted that the bat sensitivity map was produced during the bat scoping phase and although this provides an idea of the sensitivities, the studies are not yet complete. These maps will only be finalised in the final bat monitoring report (during the EIA phase) when all the data has been collected and analysed.</p>
	<p>f) It must be emphasized that the final EIAR must include a final layout map which adheres to specialist recommendations as well as the identified no-go areas and buffer zones. All turbines must be numbered on all submitted maps.</p>	<p>A final layout map will be produced during the EIA, which will adhere to specialist recommendations, no-go areas and buffer zones.</p>
	<p>g) The above site-specific map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as</p>	<p>This will be produced during the EIA phase.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	far as possible.	
	h) Google maps will not be accepted for decision-making purposes. Ensure that distinct colours are used on the maps to differentiate features, especially on the sensitivity map. In addition, turbines must be numbered for ease of reference.	All maps are generated using Esri ® ArcMap software. No google maps are included in the FSR.
	i) Include a description of the process to determine the finalised layout i.e. specialist considerations, site sensitivities etc.	Detailed studies will be undertaken during the EIA phase, whereby the appointed specialists will conduct detailed impact assessments to evaluate how the proposed turbine locations and associated infrastructure could impact the identified sensitive areas. Based on the recommendations provided by the specialists, the developer will implement seasonal restrictions (e.g. curtailment), buffer zones or possibly change the turbine locations and associated infrastructure, in an attempt to avoid sensitivities identified by specialists. A final layout map will then be developed accordingly.
	9. Public Participation Process	
	d) Please ensure that all issues raised, and comments received on the draft SR from registered I&APs and organs of state which have jurisdiction. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development	All comments and issues raised are addressed in this CRR.  Copies of comments from and communication with authorities, stakeholders, and I&APs, including written



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Planning, the Department of Agriculture, Forestry and Fisheries (DAFF), the provincial Department of Agriculture, the South African Civil Aviation Authority (SACAA), the Department of Transport, the Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African National Roads Agency Limited (SANRAL), the South African Heritage Resources Agency (SAHRA), Dr Samantha Mynhardt And Esther Matthew of the EWT’s Drylands Conservation Programme of the Endangered Wildlife Trust (EWT), BirdLife SA, CapeNature, the Cape Leopard Trust, the Department of Mineral Resources, the Department of Rural Development and Land Reform, the Square Kilometre Array (SKA) and the Department of Environmental Affairs: Directorate Biodiversity and Conservation and Protected Areas. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</p>	<p>notice of availability of the DSR for comment, and reminders to submit comments before the closing date, are included Volume III of the FSR:</p> <ul style="list-style-type: none"> <li>• Proof of Site Notice;</li> <li>• Proof of Advert;</li> <li>• Proof of Stakeholder Consultation (Emails)</li> <li>• Comments received proof; and</li> <li>• Comments and Reponses Report..</li> </ul>
	<p>e) The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40, 41, 42, 43 &amp; 44 of the NEMA EIA Regulations 2014, as amended.</p>	<p>Scoping Phase PPP has been conducted in accordance with these requirements (refer to Section 5.4 of the FSR). EIA Phase PPP will also be undertaken in conformance with these requirements.</p>
	<p>f) A comments and response trail report (C&amp;R) must be submitted with the final SR. The C&amp;R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided.</p>	<p>The C&amp;R report has been included in Volume III of the FSR.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully and in chronological order. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p>	
	<p>10. Specialist Assessments to be conducted in the EIA Phase</p>	
	<p>h) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p>	<p>Specialist methodologies are provided under Section 4.2 of the FSR and Volume II of the FSR which contain the full specialist assessments, including detailed descriptions of their methodologies followed and recommendations.</p>
	<p>i) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p>	<p>Refer to volume II of the FSR which contains the full specialist assessments, including the limitations and assumptions underpinning the assessments.</p>
	<p>j) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>	<p>This is noted. No contradicting recommendations have been made by the specialists at this point.</p>
	<p>k) It is further brought to your attention that Procedures 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, when applying for Environmental Authorisation, which were</p>	<p>All specialist assessments for the proposed Wind Energy Facility have been completed in accordance with the applicable protocols</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.</p>	<p>Appointed specialists are also SACNASP registered in their respective fields.</p>
	<p>l) Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.</p>	<p>Table 4-1 in the FSR summarises the specialist studies required by the Department's screening tool, as well as those studies which have been excluded, including a motivation as to why they were excluded. All exclusions relate to low sensitivity ratings from the screening tool.</p>
	<p>m) The screening tool output:</p> <ul style="list-style-type: none"> <li>• The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</li> <li>• Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.</li> <li>• It is the responsibility of the EAP to confirm the list of specialist assessments provided by the screening tool and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. The site sensitivity</li> </ul>	<p>Site sensitivity verifications were undertaken by the applicable specialists and have been included in Volume II of the FSR, within the specialist assessments. Table 4-1 in the FSR also details a summary of the site sensitivity verification in relation to the screening tool.</p>

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	<p>verification for each of the recommended studies, as per the protocols, must be compiled and attached. If the findings of the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.</p>	
	<p>n) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>	<p>This has been noted. No contradicting recommendations have been made by the specialists at this point.</p>
	<p>o) Confirm whether the applicant is considering offsets in terms of Riverine Rabbit or any other ecological feature. The Animal Specialist report recommends on page 15 of the report: 'Establishment of stewardship programme to research and conserve Riverine Rabbit, following appropriate Biodiversity Offset Guidelines'. Ensure that the specialist report, adequately addresses the issue of offsets, should they be required. The offset plan produced must take cognisance of the Draft National Biodiversity Offset Guideline (25 March 2022) and must include stakeholder engagement, definitive goals, timeframes, responsibilities, and management requirements. It must also include a monitoring and reporting plan to assess the effectiveness of the offset. Note that if offsets are pursued, a finalised offset plan must be presented by the final EIAR.</p>	<p>No offsets will be required, however, a research and stewardship programme to protect the riverine rabbit following the offset guidelines needs to be developed.</p> <p>It is a requirement to do more studies during the EIA phase on the Riverine Rabbit to confirm if offsets are required or not, and only if such are required, then additional offset measures will be put forward. As it was indicated by the Animal specialist, the WEF "is unlikely to have a significant negative impact on the long-term viability and persistence of animal SCCs in the area following the implementation of available mitigation measures. Large portions of the proposed development area are modified by agricultural activity, presenting an opportunity to improve habitat availability and local habitat connectivity through rehabilitation and restoration of strategic areas".</p> <p>Upon understanding the distribution of the rabbits better during studies of the EIA phase, it is highly likely</p>

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		<p>that opportunities for improving habitat condition and - connectivity for this species will be identified, and future research needs and best management practices can then be incorporated into a biodiversity management plan, which will form the basis of the research and stewardship programme. The reason why this programme needs to follow the offset guidelines, even if no offset as such may be required, is to ensure that a standardised method of collecting data on and protecting highly threatened species is applied across the country, allowing for results that can be monitored, verified, and feed into any provincial and/or national conservation plan.</p>
	<p>11. Cumulative Assessment to be conducted in the EIA Phase Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p>	
	<p>v. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</p>	<p>Four renewable energy developments have been approved within 30 km of the proposed development area, all of which being solar photovoltaic (PV) developments. The existing 44 MW Touwsrivier CPV Solar Project is situated on 190 ha to the northeast of the proposed WEF development. Solar PV developments generally require the clearance of large areas for the solar arrays, particularly in flatter low-lying areas utilized by species such as Riverine Rabbit. The only similar project within the 35km radius of the proposed development site is the Hugo WEF, which is by the same developer as Khoe. The proposed WEF development is largely focused on elevated hilltops, allowing for a reduced impact on low-lying habitats.</p>
	<p>vi. Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p>	
	<p>vii. The cumulative impacts significance rating must also inform</p>	

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	the need and desirability of the proposed development.	<p>A preliminary assessment of cumulative impacts has been made in the Scoping Phase and will be assessed further in the EIA Phase where a detailed process flow and methodology will be defined as recommended</p> <p>Since Activity 11 of Listing Notice 1 is triggered, a generic Environmental Management programme will be signed by the EAP and submitted with the final EIA report over and above the EMPr for the facility as required. The EMPr will comply with the terms of Appendix 4 of the EIA Regulations, 2014, as amended.</p> <p>The facility EMPr will include and or consider, where applicable and necessary, all the listed management plans and mitigation measures as listed / suggested. Should any of the listed management plans not be included in the EMPr, a motivation will be provided by the EAP as to why this is the case.</p>
	viii. A cumulative impact environmental statement on whether the proposed development must proceed.	
	12. Environmental Management Programme The EMPr must include the following:	
	iv. It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, must be signed and submitted with the final report over and above the EMPr for the facility.	
	v. Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.	
	vi. Should the applicant consider blade painting as a mitigation measure, as mentioned in the Avian Specialist report, this must be assessed in the report and included in the EMPr.	
	c) The EMPr must consider the following, and where possible, include:	

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	<p>xiii. An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.</p>	
	<p>xiv. A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</p>	
	<p>xv. An avifauna monitoring and management plan to be implemented during the construction and operation of the facility. A suitably qualified avifauna specialist must draft this plan.</p>	
	<p>xvi. A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must 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.</p>	
	<p>xvii. An open space management plan to be implemented during the construction and operation of the facility.</p>	
	<p>xviii. A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic</p>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.</p>	
	<p>xix. A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment.</p>	
	<p>xx. A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.</p>	
	<p>xxi. A fire management plan to be implemented during the construction and operation of the facility.</p>	
	<p>xxii. An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.</p>	



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>xxiii. An effective monitoring system to detect any leakage or spillage of all 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.</p> <p>xxiv. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</p> <p>d) The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.</p>	
	<p>General</p> <p>Please take note of GNR 4143, which was gazetted on the 04 December 2023, which requires a letter of consent from Eskom Holdings SOC Ltd if the proposed development is within a specific radius of a main electricity transmission or distribution substation. Should this gazette apply to the proposed development, please ensure the necessary documents are included.</p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: "If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a SR which has been subjected to a public participation process of at least 30 days and</p>	<p>According to the response received from Eskom Holdings SOC Ltd on the 22 January 2023, Eskom Transmission lines will not be affected by the proposed development. This correspondence has been included in Volume III of the FSR.</p> <p>The FSR has been submitted to the competent authority within 44 days of the application having been received by the competent authority. This FSR also reflects comments received during the 30-day comment period, including comments from the competent authority.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>which reflects the incorporation of comments received, including any comments of the competent authority”.</p>	
	<p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.</p>	<p>Refer to Section 2- Table 2.1 in the FSR. The Table presents compliance with the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>
	<p>Further note that in terms of Regulation 45 of the NEMA EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>	<p>This is noted. Timeframes stipulated have been adhered to in this application process.</p>
	<p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>	<p>The Applicant / EAP takes note of this and confirms that no activity has / will commence without an environmental authorisation.</p>

**TABLE 5-14 REPONSES TO COMMENTS FROM DEPARTMENT FORESTRY, FISHERIES AND ENVIRONMENT – BIODIVERSITY AND CONSERVATION (THE COMPETENT AUTHORITY FOR ENVIRONMENTAL AUTHORISATION)**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>25 January 2024</b></p> <p><b>Letter, received via email</b></p> <p><b>Department Forestry, Fisheries and the Environment (DFFE) - Biodiversity and Conservation (Tebego Kgaphola and Seoka Lekota)</b></p>	Draft Scoping Phase	DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Tebego Kgaphola (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.	<p>Good day,</p> <p>Thank you for your email. I have included the details of to Mrs P Makitla and Ms Tebego Kgaphola into the stakeholder database as requested. I have also attached the kmz file of the preliminary project layout for both Hugo and Khoe sites.</p> <p>I trust that all is in order.</p>
	Draft Scoping Phase	<p>Good morning Khosi</p> <p>Kindly find the attached comments for the aforementioned project.</p>	<p>Good day Tebego,</p> <p>Your comments are well received. Thank you.</p>
	Draft Scoping Phase	The Directorate: Biodiversity Conservation has reviewed and evaluated the reports and does not have any objection to the draft Scoping Report and the Plan of Study for EIA, however, the EIA report must comply with the procedures 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.	This is noted. The EIA report will comply with the procedures 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.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Phase	The Environmental Impact Assessment report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Wind Energy for assessing and monitoring the impact of wind energy facilities on birds in Southern Africa.	This is duly noted. The EIA report will comply with all the requirements as outlined in the EIA guideline for renewable energy projects and the Best Practice Guideline for Birds & Wind Energy for assessing and
	Draft Scoping Phase	In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dfre.gov.za for the attention of Mr. Seoka Lekota.	When the EIA phase commences, the Draft EIA report and all appendices, including the public participation documentation will be submitted to the Directorate Biodiversity Conservation at Email;

TABLE 5-15 REPONSES TO COMMENTS FROM ESKOM

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
22 January 2024 Email	Draft Scoping Phase	Good day,	Hi Mpilo,  Kindly see attached kmz file, as requested.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<b>Eskom (Mpilo Masondo, Khululwa Gaongalelwe)</b>		<p>Please could you provide a kmz file with the development footprint of the project in order to be able to see whether any of our current or future projects will be affected.</p> <p>Regards, Mpilo Masondo</p>	<p>Thank you,</p>
	<p>Draft Scoping Phase</p>	<p>Dear Sadiya</p> <p>Please send kmz files to check if Eskom infrastructure is affected.</p> <p>Warm regards Khululwa</p>	<p>Good day Khululwa,</p> <p>Please find the attached kmz file as requested. Kind regards,</p>
	<p>Draft Scoping Phase</p>	<p>Dear Sadiya</p> <p>Thank you, your project does not affect Transmission Eskom lines.</p> <p>Warm regards Khululwa</p>	<p>This has been noted with thanks.</p>

**TABLE 5-16 REPONSES TO COMMENTS FROM FALCON OIL AND GAS**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>14 December 2024</b></p> <p><b>Email Falcon Oil and Gas (Anne Flynn)</b></p>	<p>Good afternoon,</p> <p>Can you please provide the shapefiles for this, I do not believe our project overlaps and therefore we potentially are not an I&amp;AP?</p> <p>Thank you.</p> <p>Kind regards, Anne.</p>	<p>Morning Anne,</p> <p>I hope you are well.</p> <p>Kindly find the kmz file for both the Hugo and Khoe site boundaries as requested. Although, you will also find the site boundaries highlighted in the scoping reports in the project website: <a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a></p> <p>Kind regards,</p>
	<p>Good morning,</p> <p>I can confirm that these wind facilities are outside our TCP area, can I request you have us removed from the mailing list for these projects going forward?</p> <p>Thank you.</p> <p>Kind regards, Anne.</p>	<p>Hello Anne,</p> <p>Thank you for confirming this. We will remove your name from the database going forward.</p> <p>Kind regards,</p>

**TABLE 5-17 REPONSES TO COMMENTS FROM VODACOM**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>09 January 2024</b></p> <p><b>Email Vodacom (Trevor Smit and Craig Barnes)</b></p>	<p>Draft Scoping Report</p>	<p>Good day</p> <p>Please provide kmz files for the project to enable us to ascertain if the any Vodacom microwave links or services will be impacted.</p> <p>Regards Trevor</p>	<p>Good day Trevor,</p> <p>Kindly find the attached kmz file for the Hugo and Khoe sites as requested.</p> <p>I trust all is in order.</p>

**TABLE 5-18 REPONSES TO COMMENTS FROM CAPE NATURE**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>16 January 2024</b></p>	<p>Dear Khosi</p>	<p>Good day Rhett,</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
<p><b>Email Cape Nature (Rhett Smart)</b></p>	<p>Please can you register CapeNature for the EIA processes for both the Khoe and Hugo Wind Energy Facilities. CapeNature is the official commenting authority for biodiversity in the Western Cape. We have downloaded the Draft Scoping Reports and appendices from the website and will provide comment on these documents within the specified commenting timeframes.</p> <p>Please can we request shapefiles indicating the proposed development layouts? This will allow us to interrogate the development proposal in relation to our GIS data, which we wish to undertake prior to submitting comment on the Draft Scoping Reports.</p> <p>Regards</p> <p>Rhett</p>	<p>Thank you for your email. Your details have been added into the stakeholder database for both the Hugo and Khoe projects. I have also attached the kmz file of the proposed layout for Hugo and Khoe as requested.</p> <p>I trust all is in order.</p> <p>Kind regards,</p>
<p><b>07 February 2024</b></p> <p><b>Letter received via Email Cape Nature (Rhett Smart)</b></p>	<p><b>Project Proposal</b></p> <p>The results from the National Web-Based Screening Tool are presented and scoping level specialist studies have been undertaken for each of the ecological themes which is supported. These are terrestrial biodiversity, aquatic biodiversity, plant species, animal species, avifauna and bats. We wish to note however that the results from the screening tool report have not been provided.</p> <p>A preferred layout of turbines has been presented. The proposal is that the layout will be refined based on the outcomes of the scoping specialist studies therefore there aren't alternative layouts presented at this stage. It is noted that the application is currently for the maximum extent of development. It is therefore assumed that the current preferred layout is primarily based on technical considerations and the best wind resource. The</p>	<p>The results from the screening tool report have been provided in each of the specialist assessments, which have been attached in Volume II of the FSR. The screening tool results (sensitivities) have also been summarised in Table 4-1 of the FSR.</p> <p>A final layout will be refined and presented during the EIA phase of the project once all specialist assessments have been completed, and when a more accurate representation of the site sensitivities is available.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>connecting roads and cabling alignments must also be presented and assessed. Two alternative locations have been provided for the battery energy storage system (BESS) and laydown area.</p>	
	<p><b>Terrestrial Biodiversity Scoping Report</b></p> <p>The terrestrial biodiversity scoping report primarily focuses on the results from the screening tool. We wish to note that the primary informant for the terrestrial biodiversity themes for the screening tool is the WCBSP as discussed above. The critical biodiversity areas (CBAs) and ESAs are briefly mentioned and depicted on a map. We wish to note that the Western Cape Biodiversity Act (WCBA, Act 6 of 2021) has been gazetted and replaces the Nature Conservation Ordinance, with a phased implementation. We recommend that the legislation section of the Scoping Report should be amended accordingly (refers to the Northern Cape Nature Conservation Act). In this regard, according to the WCBA, the Biodiversity Spatial Plan must inter alia inform land use planning and decision making and decisions and actions by any organ of state whose policies and decisions have an impact on biodiversity. The Western Cape Biodiversity Spatial Plan Handbook should be referred to in order evaluate the development proposal in relation to the WCBSP mapping categories (Pool-Stanvliet et al, 2017).</p>	<p>The Legislation Section 1.3.1., has no reference to the Northern Cape Conservation Act, and includes the Western Cape Biodiversity Act (WCBA, Act 6 of 2021). The triggered ESAs and CBAs are elaborated in Section 3 of the Terrestrial Biodiversity Scoping Report, and reference is given to the Western Cape Biodiversity Spatial Planning (WCBSP) as the informant of the Department of Forestry, Fisheries and the Environments Terrestrial Biodiversity Theme sensitivities in Section 2.1.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>We wish to note that Figure 5 includes a map of the Hugo WEF instead of the Khoe WEF. We further wish to query Table 3 indicating animal species of conservation concern, in particular the inclusion of <i>Thalassarche melanophris</i> (black-browed albatross), which is an exclusively marine species and several of the large mammal species for which the facility is outside of the natural distribution range e.g. plains zebra (<i>Equus quagga</i>).</p>	<p>The initial inclusion of black-browed albatross (<i>Thalassarche melanophris</i>) and the several large mammal species (e.g. plains zebra, <i>Equus quagga</i>) follows observations within the vicinity of the proposed project according to online databases. These might represent chance and / or translocated individuals on private game farms. These species have been removed from Table 3, but their records on online databases noted and explained as chance and / or non-natural encounters.</p>
	<p>We wish to note that the terrestrial biodiversity scoping study is based only on desktop information and does not include a description of ground-truthed information. Based on the aerial imagery of the site, the sections of the site which are mapped as No Natural in the WCBSP consist of cultivated lands or lands which have been recently cultivated which is also reflected in the crop census on CapeFarmMapper. We do further wish to note that the current turbine layout is located mainly within the natural vegetation classified as ESA 1 and wish to advise that the transformed cultivated lands would be preferred from a terrestrial biodiversity perspective.</p>	<p>A brief description of the PAOI from the site visit is included in Section 3.2. and explains that a detailed description will be included following the subsequent EIA Specialist Survey.</p> <p>Preferential placement of wind turbines within modified and / or disturbed cultivated lands has been noted in Section 6.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Potential constraints for the development proposal should be identified within the environmental impact assessment (EIA) phase. The site survey methodology for the EIA phase will be concurrent with the plant and animal species assessments as described below and would satisfy the requirements.</p> <p>Summary of key comments:</p> <p>The terrestrial biodiversity impact assessment should indicate if there are any constraints to the layout and preferred localities for the infrastructure, taking into account transformed areas e.g. cultivated lands.</p>	<p>As indicated in Section 6 of the Terrestrial Biodiversity Scoping Report, the sensitivities presented in the Scoping Report are not final and will be refined following the prescribed detailed EIA site survey and include methods concurrent with plant and animal species assessments as outlined in Section 5 of the Terrestrial Biodiversity Scoping Report.</p>
	<p><b>Aquatic Impact Assessment Report</b></p> <p>a. The scoping phase aquatic biodiversity assessment includes a delineation of natural and artificial aquatic features in the study area. The rivers/drainage lines which were verified more or less match the mapping of the National Geo-spatial Information (NGI) mapping. No wetlands were however mapped according to the National Wetland Map however there were several wetlands identified along the Brak River by the specialist. There were however artificial wetlands (farm dams) which were identified in the National Freshwater Ecosystem Priority Area (NFEPA) mapping as indicated in Figure 5 with surrounding natural wetlands.</p>	<p>This is correct.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>b. Buffer zones have been assigned to the freshwater features using the buffer zone tool. These are 60 m for wetlands, 50 m for rivers/drainage lines and no buffer for artificial dams. We wish to note however that there appears to be an overlap between the artificial dams and wetlands, and therefore need to be included on the same map for clarity, and which should be at a finer resolution than currently presented due to the large extent of the study area. The freshwater features and associated buffer zones serve as a suitable informant as an aquatic biodiversity constraint. It is noted that the description of these features indicates that they have been heavily impacted by agricultural activities however they are all still considered of high ecological importance and sensitivity.</p>	<p>This is correct. A sensitivity map illustrating the freshwater features, alongside other environmental sensitivities in the area has been developed and included in Volume I of the FSR.</p>
	<p>c. The EIA phase assessment must include an assessment of all infrastructure, including roads and cabling and provide appropriate mitigation measures. The WET-Health and WET-EcoServices tools should be applied as appropriate to the freshwater features to assist with assessing the impacts. Additional fieldwork is not proposed for the EIA phase and should not be necessary as wetlands and riparian areas have been delineated. Impacts associated with the refined development layout and alternatives should be assessed.</p>	<p>This is duly noted. The EIA phase will include an assessment of all infrastructure and propose appropriate mitigation measures. All necessary tools will be applied as appropriate to the freshwater features to assist with the assessment of impacts.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>d. Summary of key comments:</p> <p>The constraints identified in the aquatic biodiversity assessment must be used to inform the development layout including the roads and cabling, for which the impacts associated with crossings must be assessed and mitigation measures recommended.</p>	<p>This is noted. The sensitivities and constraints identified during the freshwater assessment will be used to inform the refinement of the final layout plan as necessary.</p>
	<p>Botanical Scoping Report</p> <p>The botanical scoping report presents the results from the screening tool and provides a list of the species of conservation concern which were triggered in the screening tool. Most of the site is low or medium sensitivity with a small patch of high sensitivity. The species responsible for the high sensitivity are not mentioned. The methodology undertaken to date consists of a desktop study and a site visit for a general overview, however no evaluation of plant species present on site has taken place.</p>	<p>The species responsible for the High Sensitivity trigger, <i>Drosanthemum giffenii</i> and Sensitive Species 207, have been added and discussed in Section 3.3.</p> <p>An evaluation of plant species present on site will be undertaken and recorded in a Specialist Survey as part of the EIA Phase.</p>
	<p>The proposed methodology for the detailed site survey will be belt transects which is in accordance with the Species Environmental Assessment Guidelines (SANBI 2020). The entire extent of the study area containing natural vegetation should be surveyed for the EIA Phase, with a more concentrated effort in the high sensitivity areas and for the species flagged as high sensitivity. The constraints for the plant species theme cannot be determined until the detailed site survey has been completed. The time of year of the site survey should be optimal for identifying all species present. The EIA Phase study must comply further with the Species Environmental Assessment Guidelines.</p>	<p>The requirement for a detailed site survey during optimal flowering season, with concentrated efforts in the High Sensitivity area is confirmed in Section 5.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Summary of key comments:</p> <p>Constraints based on plant species of conservation concern must be identified and taken into account in the layout. This will need to be undertaken following a detailed site survey in accordance with the Species Environmental Assessment Guidelines.</p>	
	<p><b>Animal Species Specialist Scoping Report</b></p> <p>a. The animal species scoping report uses the species flagged in the site sensitivity screening report as the departure point. Nine species were flagged of which five are game species which have been reintroduced and are not assessed further e.g. lion, elephant.</p>	<p>This is correct</p>
	<p>b. The tortoise species is reported as least concern and the butterfly species as unlikely to occur and therefore both excluded from further assessment. Reasons that it is unlikely that Aloeides caledoni (threatened butterfly) is present on site or will be affected by the development should be provided. We wish to note however that the screening tool only flagged two non-avian species, namely Bunolagus monticularis and Aloeides caledoni, both of which were rated medium sensitivity.</p>	<p>This is correct</p>

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
	<p>c. Only critically endangered riverine rabbit (<i>Bunolagus monticularis</i>), vulnerable leopard (<i>Panthera pardus</i>) and near threatened grey rhebuck (<i>Pelea capreolus</i>) were considered relevant to the study and assessed further. We wish to note however that although the screening tool is used to flag particular species, the study should include an inventory of all species recorded and an evaluation of the impact on animal species in general. There may additionally be species of conservation concern present that have not been recorded on the site or vicinity thereof and would therefore not be reflected in the screening tool. We wish to note that the Species Protocol (GN 1150, October 2020) states "2.2.11 discuss the presence or likelihood of additional SCC including threatened species not identified by the screening tool, Data Deficient or Near Threatened Species, as well as any undescribed species or roosting and breeding or foraging areas used by migratory species where these species show significant congregations, occurring in the vicinity". The latter should include reptiles, amphibians, fish and invertebrates in addition to mammals.</p>	<p>This is correct. At the scoping phase, animal SCCs identified by the screening tool were the primary focus. The studies recommended for the EIA phase are to be used to inform a more complete species inventory of the area for impact assessment.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>d. The primary methodology was the placement of nine camera traps for a duration of 10 months between February and December. The placement is assumed to have targeted riverine rabbit within the riparian vegetation with the largest proportion in the north-eastern section of the site. It would have been beneficial to have one or two camera traps targeting other habitats on site and hence also targeting other species. An example would be the fynbos habitat within the MCA on site which could support suitable leopard habitat..</p>	<p>The fynbos habitat within the MCA on site has been assumed to support leopard.</p>
	<p>e. Confirmation is provided that riverine rabbit was recorded on the camera trap surveys with particular reference to two of the nine camera traps. The report does not however provide a detailed account of the number of riverine rabbit records per camera trap and time of year and it is further noted that the duration of placement of each camera trap varied. The camera trap survey should be used to provide a broad relative estimate of the abundance of the species on site. Grey rhebuck were also recorded on the camera traps. As indicated above, it would be useful to report on other species which may have been recorded on the camera traps. Species which are important indicators or keystone species would be informative.</p>	<p>More detailed analyses of camera trap data were ongoing during the scoping phase, as noted in the report. An account of the number of records will be provided during the EIA phase along with discussions thereof.</p>
	<p>f. We wish to note that the appendices have not been included and are required to assess the report e.g. experience with critically endangered taxa such as riverine rabbit needs to be established. Given the occurrence of riverine rabbit on the nearby Hugo WEF site, and records of leopard close to and to the south of the site, sampling</p>	<p>EWT will be consulted during the EIA phase. They have also been included as a stakeholder in the Stakeholder database.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>effort should be increased considerably for the EIA phase of the study. We recommend that it is essential that the Endangered Wildlife Trust (EWT) is consulted within the EIA phase with regards to the potential presence of riverine rabbit and the sampling methodology e.g. camera trap placement. It is noted that for the EIA phase the camera trap surveys will be supplemented by drive transects. Apart from more camera traps (with EWT's advice on placement), methods should include searches for spoor, burrows, scat, etc, and possibly also make use of a trained scent detection dog.</p>	
	<p>g. The site ecological importance (SEI) for each of the three targeted species is provided however does not include an explanation for the ratings. The reasoning for the rating for the conservation importance, functional integrity and receptor resilience for each of the species should be specified in accordance with the criteria in the Species Environmental Assessment Guidelines in order to validate the ratings. The SEI map in Figure 5 is based on the screening tool maps. The mapping of the constraints should be refined based on the site-specific mapping of habitat and species occurrence and should be used to inform the layout. Potential corridors for the key species should also be identified and taken into consideration. Cumulative impacts should also be considered in the EIA phase.</p>	<p>The omission of explanations for the SEI ratings was an oversight, and we thank you for raising this. This will be addressed and included in the FSR. The site-specific habitat mapping and species occurrence to refine the sensitivity of the site will be done during the EIA phase following more detailed analyses of the data, as noted in the report. Potential corridors, key species and cumulative impacts will be considered during the EIA phase.</p>

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
	<p>h. Summary of key comments:</p> <p>For the animal species assessment, the camera trap survey should include additional localities, not only those targeting riverine rabbit e.g. leopards are more likely to encountered in the areas of natural habitat. Other species encountered also need to be reported, in particular indicator and keystone species. Constraints to the development must be identified and</p>	<p>All species detections will be detailed during the EIA phase. Camera trap localities did represent multiple available habitats across the site. Those species with the potential to occur on site, but not detected during the camera trap process will be considered to utilize the site following the precautionary principle.</p> <p>Summary of responses:</p> <p>We thank you for taking the time to provide comments and recommendations on the scoping phase report. Comments indicated will be addressed during the EIA phase of the project.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Avifaunal Impact Assessment</p> <p>An avifaunal impact assessment was undertaken and includes collision risk modelling. Pre-construction monitoring was undertaken for a 12 month period in accordance with the Birds and Wind Energy Best Practice Guidelines (Jenkins et al 2015). The species flagged in the screening tool were monitored in addition to other priority species identified by Birdlife South Africa (Ralston-Paton et al 2017)</p> <p>Cutting-edge collision risk modelling was undertaken which according to the report is only the second time this has been applied in South Africa. The modelling could only be undertaken with species which undertook four flights or more with priority given to species of conservation concern and was therefore undertaken for seven species. Blue cranes (<i>Anthropoides paradiseus</i> – near threatened) were responsible for 93% of species of conservation concern flights recorded on the study site, with the second highest for Verreaux’s Eagles (<i>Aquila verreauxii</i> – vulnerable) at 5%. The collision risk model however takes into account a number of variables and focuses on the flight time (as opposed to individual flights) and further flight time within the rotor swept area as well as other variables such as habitat suitability. Estimated mortality rates are an output from the model and includes three scenarios, namely no mitigation, spatial model avoidance and spatial model avoidance and micro-siting. For the latter scenario, the highest modelled fatality rates are approximately 0.4 per annum for Verreaux’s Eagles, Jackal Buzzards (<i>Buteo rufescens</i>) and Booted Eagle (<i>Aquila pennatus</i>).</p>	<p>All flights and their heights and locations are used in the CRM/FRM modelling process.</p> <p>The individual flight risk map for Verreaux’s Eagle is already presented in Figure 9 of the Khoe report for interest. However, the individual risk maps for individual species would be redundant to present one at a time because what is modelled as of low risk for one species (say an eagle over the agricultural areas) cannot be used for a turbine location if it is risky for another species (say the Blue Crane). The risk maps have to be amalgamated to provide the “big picture” risky areas for all collision-prone species together. We can understand if the reviewers are simply curious about the different risk maps, but they were not presented because (i) they add nothing on their own to the big picture risk and (ii) seven different maps take up space in a report.</p>

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
	<p>The collision risk model vulnerability maps have been used as the informant for the constraints for avifauna for the proposed turbine layout. The maps are however presented as a cumulative map for the seven species which were modelled and further for the split between the species of conservation concern and the least concern species. It is noted that the cultivated lands are the sections of the study area which generally rated as the highest risk. It would be informative for interpretation for the risk maps to the split into species due to the differing habitat preferences and behaviour of the species which formed part of the model. In this regard, blue cranes are well known to be adapted to cultivated lands and therefore would be expected to have more flights in these areas however Verreaux’s Eagles prefer mountainous habitat and therefore may be expected to be more prevalent in the southern and southwestern sections of the study area etc. We recommend that the results from the collision risk models should be reconciled with data which has been collected to date for post construction mortality monitoring for other WEFs.</p>	<p>This is a good point, and it already underway in the paper that Dr Colyn is crafting using data from the Jeffreys Bay wind farm (pre-con data collected by Chris v Rooyen/Albert Froneman, post-con flights and fatality collected by BBU). The high risk and medium spatial layers provided by the Flight Risk Modelling successfully predicted where 13 of 14 Jackal Buzzards were killed, and both (2/2) Martial Eagles were killed on JBWF. Robin, Albert and we will be checking all other species for which there are data comparing predicted against known fatalities. So indeed, this process of checking the accuracy is underway and thus far it has proven very accurate in predicting where fatalities are likely to occur.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Reference is made to the species specific guidelines for Verreaux’s eagles and black harrier (Ralston-Paton &amp; Murgatroyd 2021, Simmons et al 2020). The nest buffers for these guidelines include a 3 km buffer for black harrier and a 3.7 km buffer for Verreaux’s eagle where a risk assessment model is used (5.2 km without a model). A Verreaux’s eagle nest was reported to be present 3.5 km from the western boundary but has not been plotted on any maps. No black harrier nests were recorded or listed on databases. Confirmation of compliance with the monitoring requirements of these guidelines should be provided.</p>	<p>The Verreaux’s nest should be added to the maps, and is our mistake for not plotting it on the maps. Now added. We have not excluded possible development where the 3.7 km circular VE nest buffer overlaps the Khoe western boundary because the CRM/FRM modelling showed no high risk areas there. This is mainly because it is low agricultural land, not topographically diverse habitat typically used by Verreaux’s Eagles. The CRM modelling gives us the confidence to do this since it has thus proven to be an accurate model.</p> <p>Indeed no Black Harrier nests were located and it was also ranked of low habitat quality for this Endangered species on site. Thus, the Black Harrier guidelines were not triggered. We will add a line however, stating these facts.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>While the Scoping Report does not indicate that any of the specialist studies have been used to inform the layout, the avifaunal impact assessment indicates that it has been used to inform the layout. In this regard we note that the layout included in Figure 3 of the avifaunal impact assessment excludes some of the wind turbines from the project layout plan included as a separate appendix. The excluded turbines presumably take into account the avifaunal risk constraints. Further detail should be provided regarding the recommended amendments to the layout and should make reference to specific species risk. We note that cumulative impacts of WEFs in the vicinity of the site have also been included and assessed, which is important. The impact assessment phase assessment must include confirmed mitigation measures.</p> <p>Summary of key comments: Constraints for avifauna have already been identified and amendments to the layout recommended. We recommend that the risks to the individual species needs to be described, not only the cumulative risk to all priority species.</p>	<p>The turbines depicted in Figure 3, are those that were first presented in May 2023 as a preliminary layout (as per the legend of this Figure). It does not state that this is the final layout. The turbines (now) depicted in Figure 14 (a) illustrate the final layout based on the CRM.</p>
	<p>Bat Scoping Report</p> <p>The bat scoping report indicates that pre-construction monitoring has taken place over seven and a half months between January and August using bat detectors at heights of 100 m, 50 m and 10 m. Species potentially present are provided and bat habitats present on the site. The report states that a full year of monitoring is required before the constraints can be accurately identified, however preliminary results are presented. Neoromicia capensis is the most commonly recorded species, however Tadarida aegyptiaca has the majority of the flights at 100 m which is therefore the most risky flights.</p>	<p>This is correct. Constraints and comprehensive sensitivities related to bats will be identified following the completion of the full monitoring period. These results will be presented during the EIA phase of the project.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>No major concerns have been identified at this stage and a preliminary constraints map has been provided. The impact assessment phase assessment must include confirmed mitigation measures.</p> <p>Summary of key comments:</p> <p>Constraints for bats must be identified following the full monitoring period.</p>	
	<p>We recommend that the constraints identified in each of the scoping specialist studies should be used to inform the layout of the WEF. A cumulative constraints map overlay as well as for each of the individual studies should be presented in order to establish whether all constraints have been taken into account. The map should be at a fine scale resolution and ideally also be accompanied by shapefiles or kmz files to allow for fine scale interrogation. The layout also needs to include the internal roads, electrical cabling and other supporting infrastructure, which must also be assessed in each of the specialist impact assessments.</p> <p>CapeNature will provide further comment on the development proposal once the above has been undertaken and the impact assessments for the full development proposal are complete. All specialist impact assessments must include detailed mitigation measures which must be incorporated into the Environmental Management Programme. While it is noted that the layout alternatives are being approached in an iterative process, the changes need to be clearly indicated in order to assess whether alternatives have been adequately considered.</p>	<p>These comments are noted. All constraints identified during the scoping and EIA phase of the project will be used to inform the layout of the WEF as recommended. Additionally, a Cumulative constraints map detailing the sensitivities or constraints across environmental themes will be provided during the EIA phase of the project. A sensitivity map has been provided in the FSR which includes sensitivities identified during the scoping phase across various environmental themes.</p>

**TABLE 5-19 REPONSES TO COMMENTS FROM DEPARTMENT OF AGRICULTURE WESTERN CAPE**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>07 February 2024</b></p> <p><b>Letter received via Email</b></p> <p><b>(Fadwa Mohammad)</b></p>	<p>Draft Scoping Report</p>	<p>After the construction phase of the WEF, the new impermeable hard surfaces will have runoff generated from it. The hard standing foundations also impede the normal flow of the surface and subsurface water. The areas must be monitored for signs of erosion and waterlogging and mitigation measures must be implemented to reduce these risks. Such mitigation measures, among others, would include the installation of drainage pipes that would reduce the risk of waterlogged areas around the turbine foundation. This may be especially necessary for turbines 5, 6, 14, 9 and 10 as it is situated on fallow land having a lower altitude as well as for the preferred alternative for the substation, laydown area, BESS and OM. The same principle applies to the establishment of new roads or access routes. The proposed new access road to the turbines would be crossing the natural drainage lines of the drainage basin. The Department, therefore, requests that a detailed water run-off control plan be developed and implemented.</p>	<p>This is noted. The proposed mitigation measures will be considered in the development of the EMPr during the EIA phase of the project. A detailed water run-off plan will be developed prior to the construction phase.</p>
	<p>Draft Scoping Report</p>	<p>The Western Cape Department of Agriculture has no objection to the proposed Wind Energy Facility on condition that the agricultural activities takes place on a continuous basis throughout all phases of the project.</p>	<p>This recommendation is noted and has been relayed to the project proponent.</p>
	<p>Draft Scoping Report</p>	<p>Clear communication must be established between the farmer and the applicant so that the project activities do not interfere with the day-to-day farming operations.</p>	<p>This has been noted. The project applicant and the farmers have been in constant communication throughout the pre-application through to scoping phases of the project. Communication is due to</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
			continue into the EIA phase as well as after submission has been done.
	Draft Scoping Report	Should the waterlogged areas become a problem the farmer/landowner may contact the Local LandCare office for assistance in this regard.	This is noted and will be communicated with the Landowners accordingly.
	Draft Scoping Report	Further comment will be provided once more information becomes available and a site visit has been conducted, should it be required.	This statement is acknowledged.

7. REPONSES TO COMMENTS FROM LANGEBERG MUNICIPALITY

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>04 February 2024</b></p> <p><b>Email</b></p> <p><b>Langeberg Municipality</b></p> <p><b>(Tracy Brunings)</b></p>	<p>Draft Scoping Report</p>	<p>Good day Thank you for the opportunity to comment on the above application. The proposed Khoe WEF is located on the following properties: Rem of Ptn 1 of Eendragt 38, Ptn 2 of Eendragt 38, Ptn 11 of Eendragt 38, Rem of Eendragt 37, and Rem of Farm 193, all Montagu RD. The above properties are located within the Langeberg Municipal area. From a land use planning point of view, these properties are subject to the Langeberg Spatial Development Framework (LSDF 2015, currently under review), the Langeberg Integrated Zoning Scheme, 2018 (LIZS) and the Langberg Land Use Planning Bylaw, 2015 (LLUPB). In terms of the LSDF, the areas impacted on comprise Agricultural and Buffer Spatial Planning Categories (SPCs) where agriculture and future built development, respectively, is proposed. The proposed use is therefore deemed to be in line with the LSDF in principle. The recommendations of the aquatic ecologist with regard to river crossings (Core SPCs) are of particular significance in relation to the access roads. The conclusion (Section 11.12 on pp 116/117 of the scoping report) should highlight the need to reduce the identified likely adverse impact on birdlife as a key area of concern, to be further addressed in the EIA. The property is zoned Agricultural zone I. The proposed WEF falls within the definition of Renewable Energy Structure which requires a consent application in terms of the LLUPB. There is a specific application form and fee for this land use application and a public participation process is required. The following is noted for record purposes: The proposed Hugo and Khoe Wind Energy Facilities are located between the Koo and de Doorns, some 10km apart from one another.</p>	<p>This is noted. The suggested recommendations regarding aquatics and bird life will be taken into account during the EIA phase of the project.</p> <p>It is also noted that a land use application needs to be submitted in terms of the LLUPB. This application will be drafted and submitted prior to the commencement of construction activities.</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>There will be a separate scoping and EIA processes for each of these projects, but they will run in parallel.</p> <p>The grid connection will form part of a separate scoping and EIA process.</p> <p>The Khoe WEF proposes 38 turbines with a maximum output capacity up to 290 MW. Each turbine 7.5 MW. (The Hugo WEF proposes 48 turbines with a maximum output capacity of up to 360 MW).</p> <p>Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as a 33 kV overhead/underground transmission powerline connecting the WEF to the national electrical grid network.</p> <p>Approximate areas for Khoe WEF, subject to modification during EIA process - Development footprint: 85ha.; laydown area during construction: 9ha.; BESS: 5ha.; substn: 2,5ha.; and temporary camp and concrete batching plant: 1ha.</p>	

**TABLE 5-20 REPONSES TO COMMENTS FROM DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

<b>Date of comment, format of comment, name of organisation / I&amp;AP</b>	<b>Phase of PPP</b>	<b>Comment</b>	<b>Response from EAP / Applicant / Specialist</b>
<p><b>08 February 2024</b></p> <p><b>Email</b></p> <p><b>Department of Environmental Affairs and Planning (Thea Jordan, Adri La Meyer)</b></p>	<p>Draft Scoping Report</p>	<p>Dear ERM team, I hope you are well. I hate to do this, but I am forced to ask for a one-day time extension as I am currently still waiting for 3 sets of comments on the Hugo and Khoe WEF DSR's. I understand that you are under strict timeframes to submit the FSR to the DFFE but would really appreciate it if you could please allow an extra day for me so that I can collate the comments, which should be received by this afternoon. Kind regards, Adri</p>	<p>Hi Adri, Sure, this is noted, extension granted. Thank you, Kind Regards Sadiya</p>
<p><b>09 February 2024</b></p> <p><b>Letter received via Email</b></p> <p><b>Department of Environment</b></p>	<p>Draft Scoping Report</p>	<p>The email notification of 08 January 2024 informing interested and affected parties ("I&amp;APs") of the availability of the Draft Scoping Report ("DSR"), the follow-up email of 17 January 2024 reminding I&amp;APs of the deadline for comments on the DSR, the Department's email to the environmental assessment practitioner ("EAP") on 18 January 2024 requesting proof of notification, and the email response received from the EAP on the same day, refer.</p>	
	<p>Draft Scoping Report</p>	<p>The Department apologises for submitting its comments one day after the commenting period and expresses its appreciation to the EAP for allowing the time extension. Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated December 2023 that was available for download from the website of the EAP.</p>	

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>al Affairs and Planning (Thea Jordan, Adri La Meyer</b></p>	<p>Draft Scoping Report</p>	<p>The site is mapped to contain Matjiesfontein Shale Renosterveld, Matjiesfontein Quartzite Fynbos and North &amp; South Langeberg Sandstone Fynbos. These vegetation types are classified as having an ecosystem status of least concern. Please be advised that if no endangered or critically endangered vegetation will be cleared, Activity 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) will not be triggered by the proposed development. (Note that no bioregional plan has been adopted for the Western Cape).</p>	<p>This has been noted. The Application Form has been amended to remove this activity accordingly.</p>
	<p>Draft Scoping Report</p>	<p>Please further be advised that Activity 14 of Listing Notice 3 will not be triggered by the proposed development since no systematic biodiversity plans or bioregional plans have been adopted by the competent authority.</p>	<p>This has been noted. The Application form has been amended to remove this activity accordingly.</p>
	<p>Draft Scoping Report</p>	<p>It is noted that Activity 14 of Listing Notice 1 is being applied for; however, the total storage capacity of the dangerous goods to be stored in containers has not been provided. This must be indicated in the Draft EIA Report.</p>	<p>Details on the total storage capacity of dangerous goods to be stored will be provided in Draft EIA Report.</p>
	<p>Draft Scoping Report</p>	<p>Note that the onus is on the EAP to provide a clear motivation how the listed activities identified are applicable to the proposed development.</p>	<p>To ensure that all Listed Activities that could potentially be applicable to this project are covered by the Environmental Authorisation, a precautionary approach is followed when identifying listed activities, that is, if an activity could potentially be part of the proposed development, it is</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
			listed. Motivations as to the applicability of the listed activities has been provided accordingly.
	Draft Scoping Report	The proposed development will include the storage of dangerous goods in containers; however, the impacts associated with the storage of dangerous goods have not been identified to be assessed as part of the environmental impact reporting ("EIR") phase. This must be addressed in the Final Scoping Report ("FSR") and where applicable, the Plan of Study for EIA.	To be assessed further during the EIA phase of the project.
	Draft Scoping Report	Furthermore, the flicker theme has been rated as being of very high significance by the Screening Tool. However, the impacts of flicker effects have not been identified to be assessed as part of the EIR phase. It is however acknowledged that the Scoping Visual Impact Assessment ("VIA") compiled by LOGIS dated November 2023 has indicated that the terms of reference ("ToR") for the VIA in the EIR phase include a shadow flicker assessment. Please update the Plan of Study for EIA accordingly.	The plan of study for Visual in the FSR includes the Shadow Flicker Assessment.
	Draft Scoping Report	The DSR indicates that the proposed development will include stormwater infrastructure; however, it is unclear what this will entail. The activity description must be updated to include a description of all the components associated with the proposed development.	Comprehensive details on the stormwater infrastructure, as well as other components associated with the proposed development will be provided during the EIA phase.

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Report	A detailed stormwater management plan must be included in the forthcoming Environmental Management Programme ("EMPr").	This is acknowledged and will be included in the EMPr.
	Draft Scoping Report	A site development plan/ layout that reflects all the components of the proposed development, including buffer and no-go areas, as required in terms of Appendix 3(1)(l)(ii)) of the EIA Regulations, 2014 (as amended) must be included in the Draft EIA Report. Further note that the co-ordinates of the wind turbines and the start, middle, and end co-ordinates of the roads must be included in the Draft EIA Report.	A comprehensive site layout plan reflecting no-go areas (according to specialists studies) will be included in the Draft EIA report.  Additionally, co-ordinates of the wind turbines and the start, middle, and end co-ordinates of the roads will be included in the Draft EIA Report.
	Draft Scoping Report	It is noted that water will be sourced either from Langeberg Municipality, existing boreholes in the area, or new boreholes. Please be advised that if water will be sourced from boreholes, proof of the lawful water use, or the water use licence must be included in the EIA Report.	This is noted. The necessary proofs will be provided in the EIA phase of the project where applicable.
	Draft Scoping Report	If water will be sourced from the municipality, written confirmation must be provided in the EIA Report that they have sufficient spare, unallocated capacity to supply the proposed development with water.	This is noted. The necessary proofs will be provided in the EIA phase of the project, if applicable.
	Draft Scoping Report	It is noted that the National Water Act, 1998 (Act No. 36 of 1998) is applicable to the proposed development. It is further noted that an application for either a water use license ("WUL") or a general authorisation	It is noted that the aquatic assessment found aquatic resources within the project

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>("GA") will be submitted once a decision has been taken on the application for environmental authorisation. Please be advised that confirmation of the process to be followed must be obtained and be included in the FSR or Draft EIA Report. Further note that comment from the relevant water use authority must be included in the Draft EIA Report.</p>	<p>area and thus a Water Use Authorisation (at least in terms of Section 21c and 21i) will be required. As per the protocol for all projects under the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), the submission of the Water Use License Application to the Department of Water and Sanitation is contingent upon the project securing "Preferred Bidder" status. Details on the process to be followed for the application of the Water Use Authorisation will be included in the Draft EIA report. Comments from the Department of Water and Sanitation will be included in the Draft EIA report if received.</p>
	Draft Scoping Report	<p>It is recommended that a Maintenance Management Plan be prepared for potential maintenance activities that may be required in future for the affected watercourses and encroaching structures and/or infrastructure.</p>	<p>This is noted and will be included as a recommendation in the EMPr.</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
	Draft Scoping Report	It is unclear whether the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation (“the Protocols”) published in Government Gazette <sup>1</sup> have been complied with as no information was included in the DSR (although indicated in the relevant scoping specialist studies). If this requirement has been met, this must be indicated, and clarity must be provided whether the competent authority agreed with the findings of the Site Sensitivity Verification Report.	All motivations for exclusion of studies are contained in the FSR and all exclusions relate to low sensitivity ratings from the screening tool (Table 4-1).
	Draft Scoping Report	<p>Comment from, but not limited to, the following authorities must be obtained and included in the FSR:</p> <ul style="list-style-type: none"> <li>• Department of Agriculture</li> <li>• Department of Water and Sanitation (“DWS”) / Breede-Olifants Catchment Management Agency</li> <li>• Heritage Western Cape</li> <li>• Department of Infrastructure (Roads Branch)</li> <li>• CapeNature</li> <li>• Civil Aviation Authority</li> <li>• Langeberg Municipality</li> </ul>	<p>Key Provincial Authorities were included in the PPP and provided with the DSR summary and access to the full DSR documentation, which also included a map depicting the project area and relevant geographical areas. The key provincial authorities included:</p> <p><b>Comments Received</b></p> <ul style="list-style-type: none"> <li>• Heritage Western Cape (HWC).</li> <li>• Western Cape Department of Environmental Affairs and Development Planning (DEA&amp;DP).</li> </ul>

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			<ul style="list-style-type: none"> <li>• Western Cape Department of Agriculture, Land Reform &amp; Rural Development.</li> <li>• CapeNature.</li> <li>• Civil Aviation Authority.</li> </ul> <p><b>No Comments Received</b></p> <ul style="list-style-type: none"> <li>• Western Cape Department of Economic Development and Tourism.</li> <li>• Western Cape Department of Roads and Public Works.</li> <li>• Western Cape Economic Development and Tourism</li> <li>• Western Cape Government: Department of Transport and Public Works.</li> </ul>
	Draft Scoping Report	It is expected that the proposed wind turbines will be micro-sited during the EIR phase to avoid any no-go, very high and high sensitivity areas, and to address constraints identified by the various specialists.	This is correct.
	Draft Scoping Report	According to the Animal Species Specialist Scoping Report compiled by ERM dated 29 November 2023, camera traps detected and recorded the endangered Riverine Rabbit within the proposed development area. The position of the camera trap locations (Figure 3) should be superimposed on the proposed layout plan to indicate whether any of the proposed wind turbines or associated infrastructure/structures are located near or within	A layout map reflecting the positions of the camera traps has been developed and included in the Appendices under Volume I of the FSR.

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		Riverine Rabbit habitat. No wind turbines, associated infrastructure or structures should be allowed near of within this species' habitat.	
	Draft Scoping Report	The specialist assessments and the Draft EIA Report must provide a map and an assessment of cumulative impacts for all renewable energy projects within at least a 30km radius of the proposed site. The cumulative assessment must also assess both the impacts of the proposed Khoe and Hugo wind energy facilities ("WEFs").	Four (4) renewable energy developments have been approved within 30 km of the proposed development area, all of which being solar photovoltaic (PV) developments. The existing 44 MW Touwsrivier CPV Solar Project is situated on 190 ha to the northeast of the proposed WEF development. Please refer to Appendix X in the FSR, depicting location of the existing Touwsrivier CPV Solar and proposed 110MW Ezelsjacht solar PV facility proposed on Portion 6 of the Farm Ratelbosch No. 149, De Doorns. A map of the approved renewable energy projects within 30km of the proposed development will be included in the Draft EIA report.

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			A preliminary assessment of cumulative impacts has been made in the FSR and will be assessed further in the EIA Phase.
	Draft Scoping Report	Please further ensure that the specialist assessments include a cumulative assessment of the same renewable energy projects. For example, the Animal Species Specialist Scoping Report refers to 4 solar photovoltaic ("PV") developments within 30km of the proposed development area, whereas the Heritage Scoping Report compiled by The Energy Team (Pty) Ltd dated 23 November 2023 refers to two approved solar PV developments and 1 WEF within 30km of the proposed site. It is recommended that the EAP provide all the specialists with the latest information on the approved and proposed renewable energy facilities to ensure consistency. Kindly also be informed of the proposed 110MW Ezelsjacht solar PV facility proposed on Portion 6 of the Farm Ratelbosch No. 149, De Doorns. This application is at the FSR stage.	All Specialists have been provided with the Screening Tool Report. As per the Screening Tool Report, a total of 4 approved renewable energy projects are located within 30km of the proposed development. This has been noted and accounted for in the specialist assessments.
	Draft Scoping Report	It is noted that several solar (concentrating and PV) facilities are approved and proposed within 30km radius of the proposed site. The section on alternatives (section 6) does not indicate why the applicant has opted for wind energy as opposed to solar energy. It is recommended that the forthcoming Draft EIA Report provide a description why the WEF is the preferred renewable energy technology alternative.	A motivation as to why a wind energy facility as opposed to a solar energy facility is preferred will be included in the Draft EIA report as recommended.
	Draft Scoping Report	In terms of the environmental legal framework (section 3) and policies in support of renewable energy (section 8.2), please add the National Climate Change Response White Paper (2011) as well the Western Cape Climate Change Response Strategy: Vision 2050 (2022). This Strategy can be	The FSR has been updated, referencing the mentioned policies.

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		downloaded from <a href="https://www.westerncape.gov.za/assets/departments/environmentalaffairsdevelopment-planning/wcccrs_vision_2050_march_2022.pdf">https://www.westerncape.gov.za/assets/departments/environmentalaffairsdevelopment-planning/wcccrs_vision_2050_march_2022.pdf</a> .	
	Draft Scoping Report	It is further recommended that the FSR and/or Draft EIA Report indicate how the proposed development aligns with the emerging long-term plan of the Integrated Resource Plan (2019).	This is noted and will be included in the Draft EIA.
	Draft Scoping Report	It is noted that the proposal triggers section 38(1) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) and that a Notification of Intent to develop ("NID") has been submitted to Heritage Western Cape ("HWC") on 24 November 2023. Ideally, comment from HWC on the NID should have been obtained prior to release of the DSR as their comments would inform the relevant heritage related specialist studies to be undertaken during the EIR phase. It is however recognised that all the relevant heritage (including visual) related aspects have been considered for further impact assessment.	According to HWC, a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA needs to be undertaken. Furthermore, HWC included a list of activities/recommendations that would need to be considered during the HIA.
	Draft Scoping Report	It is not clear from the ToR for the EIR phase Aquatic Impact Assessment that a Risk Assessment Matrix will be undertaken to determine whether the proposed water uses can be authorised via a WUL or GA. This should ideally be included in the ToR for the specialist appointment.	A Risk Assessment Matrix will be undertaken and submitted to the Department of Water and Sanitation as part of a separate process (not part of the EIA process), possibly once the application obtains preferred bidder status.

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	Draft Scoping Report	Cross referencing "Error! Reference source not found" throughout the DSR must be corrected.	Cross referencing updated in FSR.
	Draft Scoping Report	The Executive Summary indicates that a waste management license ("WML") may be required; however, the DSR does not allude to this. It is assumed that no WML is required.	Given the proposed project description, a WML is not required.
	Draft Scoping Report	The Executive Summary states that the proposed site is located approximately 48.9km southeast of De Doorns. This is contradictory to the DSR which refers to 20km.	The site is located 20km northwest of De Doorns, FSR updated accordingly.
	Draft Scoping Report	The Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009) (section 3.12) is not applicable to the project.	This is noted. The FSR has been updated to reflect this.
	Draft Scoping Report	The DSR indicates that portable sanitation facilities will be used during the construction phase, but it is unclear what ablution facilities will be used during the operational phase.	
	Draft Scoping Report	Page 48 of the DSR refers to a Table 5, but said table was not included in the DSR.	Reference to Table 5 has been removed from the FSR.
	Draft Scoping Report	It is mentioned on page 81 of the DSR that water requirements for the proposed development may be sourced from the landowner's existing boreholes on the site or from new boreholes that will be drilled. Details such	Borehole details of the existing boreholes on site will be

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		as depth to groundwater, location of the borehole and water right allocation should be furnished in the Draft EIA Report for these existing borehole/s.	included in the Draft EIA Report.
	Draft Scoping Report	This Directorate supports the Plan of study for EIA and the proposed specialist studies, particularly the Freshwater Impact Assessment to be undertaken, for the identification of sensitive areas to be avoided and the determination of the respective buffers for each identified aspect. This Directorate will provide further comment on the Draft EIA Report and EMPr.	Thank you, this comment is acknowledged.
	Draft Scoping Report	This Directorate is satisfied with the specialist studies proposed in the Plan of Study for EIA. Detailed comments will be provided when the Draft EIA Report is released for comments.	Thank you, this comment is acknowledged.
	Draft Scoping Report	The Noise Report for Site Sensitivity Verification and Scoping Purposes compiled by Enviro-Acoustic Research cc dated November 2023 lists the applicable legislation pertaining to noise, including the Western Cape Noise Control Regulations ("WCNCR") promulgated in Provincial Notice 200/2013. Please be advised that in terms of assessing possible impacts from new developments, EIAs, and related applications in the Western Cape Province, the WCNCR (2013) should be used as the benchmark for noise assessments.	This is noted and will be implemented accordingly.
	Draft Scoping Report	This Directorate has no further comments on the DSR and awaits the Draft EIA Report for further comments.	Thank you, this comment is acknowledged.

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	Draft Scoping Report	Please note that this Directorate has a dedicated email address reserved for all EIA related correspondences (DEADP.AQM@westerncape.gov.za). Kindly use this email address for any future correspondence.	This is noted and will be implemented accordingly. Details have also been added to I&AP database.
	Draft Scoping Report	Please note that the abovementioned recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by this Directorate should in no way be regarded as an indication or confirmation that additional information or documents will not be requested.	Thank you, this comment is acknowledged.

TABLE 5-21 RESPONSES TO COMMENT FROM DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING ON FSR

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	1. Application form	



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	Ensure the details of the EAP are updated to reflect the latest information and changes to the person responsible for this proposed project.	Application updated accordingly – updated EAP and project details
<p><b>Date: 20/05/2024</b></p> <p><b>Letter received via Email</b></p> <p><b>Department of Environmental Affairs and Planning (Mr Sabelo Malaza, Mr Wayne Hector)</b></p>	2. Listed Activities	
	<p>a) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. The physical footprint of the infrastructure in square metres must be provided in support of the applicability of this listed activity/ies.</p>	<p>All the activities that have been applied for are specific and relevant to the development activity as described in the project description. The relevant activities are included in Table 3.1 of the Draft EIA Report.</p>
	<p>b) Ensure to include thresholds for each activity applied for in the application form. The physical footprint of the infrastructure in square metres/hectares/cubic metres is not mentioned in the application form. As such, you are requested to provide the physical footprint of the infrastructure to motivate the applicability of this listed activity/ies.</p>	<p>These have been included in the application form. Please refer to table 3.1 of the Draft EIA for applicability of listing notices.</p>

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	c) Only applicable listed activities must be applied for, and the project description must be specific on what is being proposed in the final EIAR.	Acknowledged by the EAP – applicable listed activities have been applied for.
	d) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports. Provide this information as well as the coordinates of the proposed development in a separate appendix.	Table 0.1 in the Draft EIA Report provides the correct SG codes, farm names and numbers. These have been included as appendix 9 in the application form.
	e) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department’s application form template has been amended and can be downloaded from the following link <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a> .	The listed activities in the scoping report corresponds with the Draft EIA Report
	f) The listed activities represented in the EIAR and the application form must be the same and correct.	The listed activities in Table 3.1 of the Draft EIA Report correspond with the listed activities in the application form.
	g) Landowner consent has not been provided in Appendix 3 submitted with the application form or the draft SR. Ensure that landowner consent is provided with the next document submission.	Landowner consent forms have been included in the updated application form.

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	3. Alternatives	
	a) The EAP is required to provide a <b>clear assessment</b> for each identified/ or assessed alternative and further provide clear motivation and reasons as to why the preferred alternative proves to be the preferred compared to other Alternatives. This relates to the location alternative, site layout alternatives/design, technology alternative, and Battery Energy Storage Systems alternatives.	An assessment for each identified alternative location, layout alternative and technology alternative has been included. A clear motivation and reason for the selection of the preferred alternative have been included in this draft EIA report.
	b) The EIAR must provide the five corner coordinates points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided. Coordinates must be in the format as prescribed by the NEMA EIA Regulations, 2014, as amended. A separate appendix, as indicated above, must be provided for co-ordinates.	Coordinates for the have been included in table 0.5 in the Draft EIA.

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p><b>4. Layout &amp; Sensitivity Maps</b></p> <p>a) All available biodiversity information must be used in the finalisation of the final layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:</p> <ul style="list-style-type: none"> <li>i. Ensure that the titles of the maps are consistent. The preferred layout must be presented in the final layout map.</li> <li>ii. The final envisioned area for the wind facility, i.e. location of wind turbines (including turbine numbers) and all associated infrastructure including BESS and all associated infrastructure should be mapped at an appropriate scale.</li> <li>iii. All supporting onsite infrastructure such as concrete turbine foundations and turbines hard stands, on-site IPP substation, temporary and permanent laydown areas, overhead or underground cabling between the turbines, temporary staff accommodation areas, BESS area, access roads and internal gravel roads, fencing and lighting, telecommunication infrastructure area, stormwater channels, water pipelines, offices and operational control centre, operation and maintenance area / warehouse / workshop, ablution facility areas, and etc.</li> <li>iv. All necessary details regarding all locations and sizes of the substations and internal power lines.</li> <li>v. All necessary details regarding related to the proposed wind facility.</li> <li>vi. Turbines must be clearly numbered.</li> <li>vii. All existing infrastructure on the site, especially internal road infrastructure.</li> <li>viii. The maps should be provided in high resolution and be clear and legible. Ensure to use a definitive icon or colour which contrasts against the background information and colours of the maps provided</li> </ul>	<ul style="list-style-type: none"> <li>i. Refer to Volume I for figures</li> <li>ii. Refer to Volume I – Figure 3</li> <li>iii. This will be produced prior to construction</li> <li>iv. Refer to Volume I – Figure 3</li> <li>v. Refer to Volume I – Figure 3</li> <li>vi. Refer to Volume I - Figures</li> <li>vii. Refer to Volume I – Figure 3</li> <li>viii. Refer to Volume I – Figure 3</li> <li>ix. Refer to Volume I – Figure 5 to 6.3</li> </ul>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>ix. Please provide an environmental sensitivity map, if possible, which indicates the following:</p> <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;</li> <li>• Sensitivity Buffer areas; and All “no-go” areas.</li> </ul>	
	<p>b) It must be emphasised that the final EIAR must include a final layout map which adheres to specialist recommendations as well as the identified no-go areas and buffer zones. All turbines must be numbered on all submitted maps. Please include a separate appendix which contains all relevant mapping information.</p>	<p>Figure 6.1 -6.3 of the Draft EIA Report report includes a map combining the layout map superimposed (overlain) on the environmental sensitivity map.</p>
	<p>c) The above site-specific map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>	<p>Refer to Volume I - Figures</p>
	<p>d) Google maps will not be accepted for decision-making purposes. Ensure that distinct colours are Used on the maps to differentiate features, especially on the sensitivity map.</p>	<p>Google maps have been avoided in the EIA Report.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	e) Include a description of the process to determine the finalised layout i.e. specialist considerations, site sensitivities etc.	An evolution report has been included as appendix C.
	f) A cumulative map which shows the proposed wind farms linked to this application (i.e. Khoe WEF Application currently in process). The map should highlight the grid connections used and show if the WEFs will share any infrastructure.	Cumulative map has been included in Volume I - Figures
	g) 'Section 11.9.2 Visual Sensitivities' of the Final Scoping report highlights numerous visual sensitivities and their recommended buffers. The turbines occurring within these buffers must be either microsituated as far as possible or motivated for. Include turbine numbers when providing these motivations to ensure ease of map reference.	The layout has been revised twice during the EIA phase to account for visual sensitive areas. However, according to the VIA turbines are still located in high sensitive areas. A motivation for the turbines still located in these high sensitive areas have been provided by the EAP in the EIA Report.
	5. Public Participation Process	
	a) Please ensure that all issues raised, and comments received from registered I&APs and organs of state which have jurisdiction are submitted to the Department with the EIAR. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning, the Department of Agriculture, Forestry and Fisheries (DAFF), the provincial Department of Agriculture, the South African Civil Aviation Authority (SACAA), the Department of Transport, the Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African National Roads Agency Limited	These have been included in Volume III – Comments and Response Report

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	<p>(SANRAL), the South African Heritage Resources Agency (SAHRA), EWT, BirdLife SA, CapeNature, the Department of Mineral Resources, the Department of Rural Development and Land Reform, the Square Kilometre Array (SKA) and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation (BCAdmin@dffe.gov.za, for the attention of Mr Seoka Lekota) and Department of Forestry, Fisheries and the Environment: Protected Areas Management Effectiveness.</p>	
	<p>b) Please ensure that all issues raised and comments received during the circulation of the final SR from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the EIAR. Proof of correspondence with the various stakeholders must be included in the EIAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</p>	<p>Final scoping has been circulated however no comments were received during this period.</p>
	<p>c) The Public Participation Process must be conducted in terms Regulation 39, 40, 41, 42, 43 &amp; 44 of the NEMA EIA Regulations 2014, as amended.</p>	<p>This process has been conducted accordingly.</p>
	<p>d) A comments and response trail report (C&amp;R) must be submitted with the draft EIAR. The C&amp;R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully and in chronological order. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p>	<p>C&amp;R report has been included as Volume III</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>e) Please include the date of publishing and the names of the newspapers used in the EIAR.</p>	<p>Details of newspaper advertisements have been included in Section 9 of the Draft EIA Report</p>
	<p><b>6. Specialist Assessments</b></p>	
	<p>a) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:                      A detailed description of the study’s methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.                      Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.                      Please note that the Department considers a ‘no-go’ area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the ‘no-go’ areas.                      Should the specialist definition of ‘no-go’ area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the ‘no-go’ area’s buffer if applicable.                      All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and</p>	<p>Please refer to Sections 10 – 12 and Volume II – Specialist studies.                      The EAP acknowledges that the departments definition of a ‘no-go’ area is for any infrastructure, including the associated infrastructure such as access roads. The proposed development, including the associated infrastructure is not proposed within no-go areas.                      The avifauna and bat specialist has identified areas of no-go for turbines. These areas are clearly defined and marked in the maps.                      All specialist studies are final and provide detailed / practical mitigation measures.                      Further studies are only provided for post construction of the proposed development.                      Specific mitigation measures as recommended by specialists are clearly indicated the EIA Report and EMPr.</p>



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	<p>recommendations, and must not recommend further studies to be completed post EA. Should a specialist recommend specific mitigation measures, these must be clearly indicated. Regarding cumulative impacts: Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. The significance rating must also inform the need and desirability of the proposed development. A cumulative impact environmental statement on whether the proposed development must proceed. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>No contradicting recommendations were provided by specialists. Specialists' recommendations have been considered and included Section 13 of the EIA Report to be included in EA and / or in the EMPr for implementation. An assessment of cumulative impacts, including significance ratings, has been included in Section 4.3.3 and Section 11 of the EIA Report. The actual development footprint of the nearby Renewable Energy developments could not be easily quantified or assessed spatially. For example, the National Renewable Energy EIA Application Database contains the land parcels, and not the footprint. Nonetheless, it is believed that the assessment of cumulative impacts has been adequately captured in this EIA Report.  Detailed process flow and proof of the assessments have been included in the individual independent specialist reports.  The need and desirability of the proposed project takes into account the cumulative impacts of surrounding developments of the area.  A statement of the cumulative impacts of the proposed development has been included in the report.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		No contradicting recommendations were provided by specialists. Specialists' recommendations have been considered and included Section 13 of the EIA Report to be included in EA and / or in the EMPr for implementation.
	b) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.	All specialist studies includes detailed description of their methodology, as well as the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.
	c) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.	Please refer to Section 2.5 in the EIA report
	d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.	No contradicting recommendations, apart from visual specialist. The locations of turbines within high sensitive areas are currently the best for wind resource potential and the removal of these will entirely jeopardize the project.
	e) It is further brought to your attention that Procedures 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, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the	The EAP is aware of the requirements of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998. Specialist assessments will be conducted in accordance with Government Notice No. 320 of 20 March 2020.

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists’ to be registered with SACNASP in their respective field.</p>	
	<p>f) Please include a table in the report, summarising the specialist studies required by the Department’s Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists’ studies and requirements/protocols recommended in the Department’s Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.</p>	<p>Please refer to Section 4, table 4-1 of the EIA Report</p>
	<p>g) The screening tool output:                      The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.                      Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.                      It is the responsibility of the EAP to confirm the list of specialist assessments provided by the screening tool and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached. If the findings of the site verification differed from the screening</p>	<p>Please refer to Section 4, table 4-1 of the EIA Report</p>

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	<p>tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.</p>	
	<p>h) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>Please refer to response above.</p>
	<p>i) If no wake effect assessment is to be included, please include a motivation thereof.</p>	<p>No wake effect assessment required, as there are currently no neighbouring wind farms within the project area (35 km).</p>
	<p>j) It is highly emphasised that specialist assessments are done in the correct season to ensure a comprehensive understanding of the environment.</p>	<p>Please refer to Volume II – Specialist Reports</p>
	<p>k) It is noted in the Comments and Responses report, Page xxix, that no offset is planned for the development. However, 'a research and stewardship programme to protect the riverine rabbit following the offset guidelines needs to be developed.' Further information must be provided once the specialist assessments provide deeper understanding into their distribution in the area.</p>	<p>Wording has been amended to align with terminology defined in the national offset guidelines. The restoration of modified habitat was the original intention, i.e., as part of the mitigation hierarchy. This would result in a low negative or positive residual impact and therefore no offsets as contemplated by the guidelines are considered applicable.</p>
	<p>l) A biodiversity offset investigation must be employed if the proposed development has RESIDUAL MEDIUM to HIGH impact i.e., after the mitigation hierarchy has been exhausted. Please</p>	<p>The residual impact would not be medium or high after the mitigation hierarchy has been exhausted- it will be low or positive following rehabilitation</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>consult the National Offset Guideline. The offset plan must include stakeholder engagement, definitive goals, timeframes, budget responsibilities and management requirements. It must also include a monitoring and reporting plan to assess the effectiveness of the offset. Any offset considerations must include Should an offset plan need to be compiled, note that a final offset plan must be submitted with the final EIAr.</p> <p><b>7. Cumulative Assessment</b></p>	
	<p>Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> <li>i) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</li> <li>ii) Detailed process flow and proof must be provided, to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>iii) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>iv) A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>An assessment of cumulative impacts, including significance ratings, has been included in Section 4.3.3 and Section 11 of the EIA Report. The actual development footprint of the nearby Renewable Energy developments could not be easily quantified or accessed spatially. For example, the National Renewable Energy EIA Application Database contains the land parcels, and not the footprint. Nonetheless, it is believed that the assessment of cumulative impacts has been adequately captured in this Draft EIA Report.</p> <p>Detailed process flow and proof of the assessments have been included in the individual independent specialist reports.</p> <p>The need and desirability of the proposed project takes into account the cumulative</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		<p>impacts of surrounding developments of the area.</p> <p>A statement of the cumulative impacts of the proposed development has been included in the report.</p>
	<p>8. Environmental Management Programme</p>	
	<p>A final construction and operational phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAR. It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, must be signed and submitted with the final report over and above the EMPr for the facility. Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the NEMA EIA Regulations, 2014, as amended.</p>	<p>A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures has been drafted and will be submitted with the EIAR.</p> <p>The generic EMPr for the development of a substation has been appended to the EMPr submitted with the Draft EIA Report.</p>
	<p>b) The EMPr must consider the following, and where possible, include:</p> <ul style="list-style-type: none"> <li>An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and</li> </ul>	<p>The content of the EMPr produced for the proposed development is in compliance in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended, and includes, where relevant the plans and measures recommended by the Department.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>ensure that the continuous monitoring and removal of alien species is undertaken.</p> <ul style="list-style-type: none"> <li>• A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</li> <li>• An avifauna monitoring and management plan to be implemented during the construction and operation of the facility. This plan must be drafted by a suitably qualified avifauna specialist.</li> <li>• A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must 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.</li> <li>• An open space management plan to be implemented during the construction and operation of the facility.</li> <li>• A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time up areas so as not to disturb existing retail and commercial operations.</li> </ul> <p>A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment.</p> <p>A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow</p>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.</p> <p>A fire management plan to be implemented during the construction and operation of the facility.</p> <p>An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.</p> <p>An effective monitoring system to detect any leakage or spillage of all 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.</p> <p>Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</p>	
	<p>The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.</p>	<p>Contradicting recommendations were provided by specialists. Specialists' recommendations have been considered and included Section 13 of the Draft EIA Report to be included in EA and / or in the EMPr for implementation.</p>



**TABLE 5-22 RESPONSES TO COMMENTS ON FSR**

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>14 May 2024</b></p> <p><b>Marius Reitz</b></p> <p><b>LBF Observatory</b></p>	<p>Final Scoping Phase</p>	<p>Dear Sadiya,</p> <p>Thank you for your reply. Can you please let me know when the draft EIA will become available for public participation?</p> <p>Kind Regards Marius Reitz</p>	<p>Hi Marius,</p> <p>Yes you will be notified once the Draft EIA becomes available for public participation.</p> <p>Kind Regards</p>
<p><b>26 June 2024</b></p> <p><b>Lina Grube</b></p> <p><b>Wirleben.de</b></p>	<p>Final Scoping Phase</p>	<p>Good day,</p> <p>please find attached our signed registration and comment sheet. On this note, I find it quite disturbing that we, Drie Kuilen Nature Reserve, are mentioned several times in various reports and assessments about the planned wind farm but have never been contacted. Instead we had to do our own research just to figure out what exactly is planned in our area. Only one person ever visited our site to do a “visual assessment”, that is how we heard about the project. I will appreciate more transparency and communication in future.</p> <p>Since Drie Kuilen has never been part of investigations I have strong doubts about the truthfulness of some report. Mainly the avian report that states no breeding Verreaux eagles, no nesting owls, no resident black harriers. This is imply wrong, we have all of them and our breeding pair of Verreaux eagle with a juvenile in March is a huge problem for the proposed farm as these are moving within the 5.4km radius – even breeding in that area. We also have three different owls on the property, a breeding pair as well, various bats and a very long bird list. This is crucial to any decision but</p>	<p>Good day Lina,</p> <p>Thank you for your response.</p> <p>Kindly note that site notices were placed along site boundary as well as within the area – kindly see attached report.</p> <p>Regarding the Verreaux eagle nest, this is currently inactive, and an appropriate buffer has been implemented to avoid encroachment.</p> <p>We appreciate your response, and you will be notified once the Draft EIA becomes available.</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>unfortunately the avian report did not include our property or shares the same knowledge.</p> <p>We are a protected area with 4.300ha untouched nature and protected game. We finance our conservation due to tourism and accommodation. The building phase of the wind farm will heavily affect our business due to road damage, blockages, etc. and once the turbines are up we are concerned about the visual effects of the historic and remote Klein Karoo. The Nougaspoort corridor has been working hard in the past years with Montagu-Ashton and Touwsrivier tourism associations to become better known and push the tourism, organize bicycle tours and establish a route of remote places. After COVID hit it took us all a while to develop this strong tourism section in our mountain range and finally this year we're feeling the tourism numbers picking up. That stretches from Leeuwenbosch, Kopbeenskloof, Huizen, Gecko Rock, Rooikrans, Desert Wind... All of us rely on the access via R318 and the gravel corridor.</p> <p>I am a family member of the owners and manage our reserve for my family. There are two managers on the ground, Stefan and Elena Short as well as our team.</p> <p>I am looking forward to hear back from you soon.</p> <p>Best regards, Lina Grube</p>	<p>Thank you,</p> <p>Kind Regards</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>2 July 2024</b></p> <p><b>Annelize Harmse</b></p> <p><b>Transnet</b></p>	<p>Final Scoping Phase</p>	<p>Good Morning The attached Notification is for your further attention and comments, please. Regards Annelize Harmse</p>	
<p><b>2 July 2024</b></p> <p><b>Brandon Layman</b></p> <p><b>Western Cape Government</b></p>	<p>Final Scoping Phase</p>	<p>Hi Mr. Khoe Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General. The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that. As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy. The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network. CD or USB we can still put on a physical file. With many thanks and kind regards Brandon Layman</p>	<p>Good day, Kindly note the hard copies of the Scoping reports were sent previously.</p> <p>Thank you</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>3 July 2024</b></p> <p><b>Dirk Uys</b></p> <p><b>Breede</b></p>	<p>Final Scoping Phase</p>	<p>Dear Sadiya Salie, Thank you for your Notification of the Submission of the Final Scoping Report for the Proposed Hugo and Khoe WEF to the Department of Forestry, Fisheries and the Environment. Kind regards. Dirk Uys 03/07/2024</p>	<p>EAP acknowledges receipt thereof</p>
<p><b>10 July 2024</b></p> <p><b>Nrateng Mashiloane</b></p> <p><b>Aviation Environmental Compliance Department</b></p>	<p>Final Scoping Phase</p>	<p>Good day, I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: <a href="http://www.caa.co.za/industryinformation/obstacles/">www.caa.co.za/industryinformation/obstacles/</a> . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: <a href="http://www.caa.co.za">www.caa.co.za</a>.</p>	<p>The obstacle assessment will be undertaken on approval of the EA.</p>
<p><b>12 July 2024</b></p> <p><b>Rhett Smart</b></p> <p><b>Cape Nature</b></p>	<p>Final Scoping Phase</p>	<p>Dear Sadiya I did not note any public participation documents or comments and response report on the website as part of the Final Scoping Report for submission. We are interested to know how our comments are being addressed. Regards Rhett</p>	<p>Hi Rhett,</p> <p>As per Legislation, it is not a requirement to upload the Final Scoping for review, only notification of FSR submission to DFFE is required.</p> <p>I have attached the CRR for your perusal.</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
			Thank you,
<p><b>12 July 2024</b></p> <p><b>Rhett Smart</b></p> <p><b>Cape Nature</b></p>	Final Scoping Phase	<p>Hi Sadiya</p> <p>Yes you are correct – we are aware that the final versions of reports do not need to be released for public participation. Thank you for providing us with the comments and response reports.</p> <p>Regards</p> <p>Rhett</p>	EAP acknowledges receipt thereof
<p><b>7 August 2024</b></p> <p><b>Heinn Havinga</b></p> <p><b>PSG</b></p>	Final Scoping Phase	<p>Good day Sadiya</p> <p>Can you please confirm that my objection against the project has been noted and added to the report.</p> <p>Regards</p> <p><b>Heinn Havinga</b></p> <p>Wealth Manager</p>	<p>Hi Heinn,</p> <p>Your response has been included in the comments and response report.</p> <p>You will be notified once the Draft EIA becomes available for Public review.</p> <p>Kind Regards</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist

DRAFT EIA REPORT COMMENTS FOR 23 AUGUST TO 23 SEPTEMBER 2024

TABLE 5-23 RESPONSES TO COMMENTS FROM IAPS

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>25 August 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya,</p> <p>Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.</p>	<p>Hi Eleanor,</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>Eleanor Richardson</b></p> <p><b>SABAA</b></p>		<p>In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09_hugo_bat_report.pdf) and her resulting assessment of the situation is extremely competent.</p> <p>Unfortunately, however, I do not believe that the Draft EIA (<a href="https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-deiar_20240823.pdf">https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-deiar_20240823.pdf</a>) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (<i>Tadarida aegyptiaca</i>, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 “The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance” does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.</p> <p>Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.</p>	<p>Thank you for your feedback.</p> <p>We have updated the final EIA Report, taking into consideration your comments. Please note it was not our intention to ‘hide’ the sensitivity of bats, thus we have revised the report to include the high sensitivity zones.</p> <p>Please also note, we have not included bat and bird species under the Table 6.2, as these were assessed separately.</p> <p>Kind Regards</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.</p> <p>Best wishes,</p> <p>Eleanor Richardson</p> <p>Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.                      South African Bat Assessment Association                      Website: <a href="http://www.sabaa.org.za">www.sabaa.org.za</a>                      Email: <a href="mailto:chair@sabaa.org.za">chair@sabaa.org.za</a> / <a href="mailto:richardsonpeplow@gmail.com">richardsonpeplow@gmail.com</a>                      Personal cell: + 27 82 559 7681</p>	
<p><b>25 August 2024</b></p> <p><b>Email</b></p> <p><b>Eleanor Richardson</b></p>	<p>Draft EIA Phase</p>	<p>Hi Sadiya, I can't find the Khoe DEIAr on the ERM website. All the specialist reports are there, but no EIA. Can you send it to me please? Thanks, E.</p>	<p>Hi Eleanor,</p> <p>It appears that you may not have access. We're currently reviewing the website and working with our IT team to resolve any issues.</p> <p>Please see attached Khoe Draft EIA Report for your review.</p> <p>Kind Regards</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>26 August 2024</b></p> <p><b>Email</b></p> <p><b>BC Admin Tebego Kgaphola</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sir/Madam</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Tebego Kgaphola (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.</p> <p>Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota</p>	<p>Good day,</p> <p>This has been noted.</p> <p>Kindly see attached KMZ files, as requested.</p> <p>Kind Regards</p>
<p><b>26 August 2024</b></p> <p><b>Email</b></p> <p><b>Heritage Western Cape</b></p>	<p>Draft EIA Phase</p>	<p>Good day</p> <p>Please can you provide me with HWC reference number for me to provide you with a comment.</p> <p>If there was no NID trigger, please not that HWC cannot comment on matters that do not form part of our mandate.</p> <p>Please include your HWC reference number in future correspondence to assist in responding to your query promptly.</p> <p>Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query</p> <p>Kind regards,</p>	<p>Hi Stephanie,</p> <p>The HWC for Hugo WEF is HWC23102514SB1124.</p> <p>Thank you,</p> <p>Kind Regards</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>Application forms 2024: Applications Link</p> <p>Notice</p> <p>Stephanie-Anne Barnardt-Delport</p>	
<p><b>26 August 2024</b></p> <p><b>Email</b></p> <p><b>Heritage Western Cape</b></p>	<p>Draft EIA Phase</p>	<p>Good day</p> <p>Please can you provide me with HWC reference number for me to provide you with a comment.</p> <p>If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.</p> <p>Please include your HWC reference number in future correspondence to assist in responding to your query promptly.</p> <p>Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query</p> <p>Kind regards,</p> <p>Application forms 2024: Applications Link</p> <p>Notice</p>	<p>Hi Stephanie,</p> <p>The HWC for Hugo WEF is HWC23102514SB1124.</p> <p>Thank you,</p> <p>Kind Regards</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		Stephanie-Anne Barnardt-Delport	
<p><b>26 August 2024</b></p> <p><b>Email</b></p> <p><b>AgriSA</b></p>	Draft EIA Phase	<p>Good day</p> <p>Please send notifications of this nature to janse@lagrisa.org.za and remove this email from your mailing list.</p> <p>Kind regards</p>	<p>Noted – thank you.</p> <p>Hi Thea,</p> <p>Delivery has failed to the recipient, is there an alternative email address?</p> <p>Kind Regards</p>
<p><b>26 August 2024</b></p> <p><b>Email</b></p>	Draft EIA Phase	<p>Dear Sadiya Salie,</p> <p>Thank you for your letter of Notification of Submission: Draft EIA Report Hugo and Khoe WEFs.</p> <p>I have read the Reports and confirm that I am in favour of the project's final approval.</p> <p>Kind regards</p> <p>Dirk Uys</p>	<p>Good day Dirk,</p> <p>We appreciate your feedback.</p> <p>Kind Regards</p>
<p><b>26 August 2024</b></p>	Draft EIA Phase	<p>Hi Sadiya,</p> <p>I hope you are well.</p>	<p>Hi Adri,</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>Email</b></p> <p><b>Western Cape Gov</b></p>		<p>Thank you for the email. Sorry to ask for this, but would it be possible to upload the docs via WeTransfer/DropBox or OneDrive? It is quite cumbersome to download it via our very slow network.</p> <p>Many thanks, Adri</p>	<p>I have shared the reports via onedrive, kindly confirm if you have received the link.</p> <p>Kind Regards</p>
<p><b>26 August 2024</b></p> <p><b>Email</b></p> <p><b>PSG Wealth</b></p>	<p>Draft EIA Phase</p>	<p>Good day Sadiya</p> <p>Would you please be so kind and send the report to me via OneDrive or e mail.</p> <p>regards</p>	<p>Good day Heinn,</p> <p>I have shared the reports via onedrive, kindly confirm if you have received the link.</p> <p>Kind Regards</p>
<p><b>26 August 2024</b></p> <p><b>Email</b></p> <p><b>Langeberg Municipality</b></p>	<p>Draft EIA Phase</p>	<p>Good day,</p> <p>There are no further comments on the KHOE WEF, subsequent to my email dated 4 February 2024, which has been included in your comments and responses table.</p>	<p>Thank you, Tracy.</p> <p>Kind Regards</p>
<p><b>27 August 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Good day</p> <p>The HIA is to be heard this Monday, 2 September.</p> <p>HWC comment to follow.</p> <p>Kind regards,</p>	<p>Dear Interested and Affected Party,</p> <p>This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns,</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>Application forms 2024: Applications Link</p> <p>Notice</p> <p>Stephanie-Anne Barnardt-Delport</p>	<p>Western Cape Province before the 23rd of September 2024.</p> <p>Thank you,</p> <p>Kind Regards</p>
<p><b>27 August 2024</b></p> <p><b>Email</b></p> <p><b>Western Cape Gov</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya,</p> <p>Apologies for the late response; I was on (sick) leave yesterday.</p> <p>Thanks so much for your assistance. I confirm that I have received the link and managed to download the folders, thanks again.</p> <p>Kind regards, Adri</p>	<p>Thanks Adri. Kindly note submission of comments closes today.</p> <p>Please confirm if you will be sending through your comments today.</p> <p>Kind Regards</p>
<p><b>30 August 2024</b></p> <p><b>Email</b></p> <p><b>Nrateng Mashiloane</b></p>	<p>Draft EIA Phase</p>	<p>Good day,</p> <p>I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: <a href="http://www.caa.co.za/industryinformation/obstacles/">www.caa.co.za/industryinformation/obstacles/</a> . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: <a href="http://www.caa.co.za">www.caa.co.za</a>.</p>	<p>N/A – Client to undertake obstacle assessment upon receiving EA</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>4 September 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Dear Fatima,</p> <p>Kindly see attached notice for the attention of the Western Cape Province.</p> <p>Kind Regards Loumari</p>	<p>N/A</p>
<p><b>4 September</b></p> <p><b>Aida Form</b></p>		<p>1. What's your name? H Kuhn</p> <p>2. Who do you represent? PVT capacity as neighbouring farm owner Neighbouring farm owner</p> <p>3. Your Email kuhnhuis@gmail.com</p> <p>4. Your Phone Number +27832817521</p> <p>5. Alternative Phone Number +27829060330</p> <p>6. Your Address RE 7 De Braak Montagu Rural Langeberg District, Cape Town, Western Cape, 6720, South Africa</p> <p>7. What is your interest in the projects? Neighbouring farm</p>	<p>Hi Kuhn,</p> <p>Thank you for your comments.</p> <p>Kindly note that studies have been undertaken to address the points you have raised. The studies adequately assessed the following:</p> <p>Visual, including tourism Noise Flora and Fauna Avifauna</p> <p>The comments raised will be taken forward and incorporated into the Final EIA Report.</p> <p>Kind Regards</p> <p>Sadiya Salie</p>

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		<p>8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? Yes</p> <p>9. What are your comments regarding the Hugo and Khoe WEF Facilities? Wind farm objections</p> <ol style="list-style-type: none"> <li>1. Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms</li> <li>2. Aesthetically unpleasing</li> <li>3. Noise pollution (aerodynamic noise/vortex &amp; mechanical noise)</li> <li>4. Shadow flickers</li> <li>5. Wildlife: flying animals (currently there is a pair of endangered eagles in the mountains with fledglings, Blue crane birds, migrating ducks &amp; geese, owls, bats, crows &amp; hawks) Collisions with turbines, vacuum created pulls flying animals out of their current, turbines interfering with bat sonar navigation.</li> <li>6. Disturbance to Fona &amp; Flora</li> <li>7. Affecting tourism, which this area highly relies on.</li> <li>8. Lightning &amp; Fire damage to turbines.</li> <li>9. Wind-turbine syndrome due to possible fluctuations in air pressure, vibrations &amp; infrasound – further research still undergoing but can't with 100% certainty be disregarded.</li> </ol> <p>10. Protection of Personal Information (POPI) Act, Act 4 of 2013 Yes</p>	

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<p><b>4 September 2024</b></p> <p><b>Email</b></p> <p><b>Deputy Director: Administration: Restitution: Western Cape</b></p>	<p>Draft EIA Phase</p>	<p>Good day Mr Khoe, The Office of the Regional Land Claims Commissioner: Western Cape acknowledge receipt of your email and is brought under the attention of our Operational Management Unit's Mr David Smit and the Department of Agriculture Land Reform and Rural Development's Overberg and Cape Winelands District Director. Kind regards,</p>	<p>Thank you for your response. This has been noted.</p> <p>Kind Regards</p>
<p><b>5 September 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Good day Sadiya,  I've forwarded your request to stakeholder in the area and requested that they respond to your email directly.  Yours in Tourism. Melanie</p>	<p>Thank you Melanie.</p> <p>Kind Regards</p>
<p><b>6 September 2024</b></p> <p><b>Email</b></p> <p><b>Transnet</b></p>	<p>Draft EIA Phase</p>	<p>Good day  Your e-mail dated 01.07.2024 refers.  Kindly note that Transnet will not be directly affected by the proposal. Please refer to the attached Google Imagery.</p>	<p>Thank you for your response. This has been noted.</p> <p>Kind Regards</p>



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		<p>The distance from Matroosberg High Site to the nearest Wind Turbine (WTG5) is ± 2km.                      The distance from Matroosberg Station railway line to the nearest Wind Turbine (WT43 and WTG45) is 800m</p> <p>Kind Regards.</p>	
<p><b>12 September 2024</b></p> <p><b>Email</b></p> <p><b>PSG Wealth</b></p>	<p>Draft EIA Phase</p>	<p>Good day Sadiya</p> <p>Please find attached my feedback on the project. Please Let me know if I have not complied with any specifications regarding the feedback proses.</p> <p>Regards</p>	<p>Hi Heinn,</p> <p>The mentioning of Hugo WEF on page 46 was a typo which has now been corrected. The preceding photo simulation showing the before, was captioned: Viewpoint taken from the Middelberg Main lodge complex looking south, south east towards Khoe WEF. It must be noted that the points used for the various photo simulations were geo-located and a 3D Google Earth model was generated in order to determine the approximate distance of the proposed turbines from these points. To say that the distance is in fact 3.2 km as opposed to 4 km, based on just a placemark with no turbine layout is inaccurate.</p>

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			<p>The photo simulations were generated using WindPro Photomontage module which considers the apparent size, shape, dimension, position and light shading when undertaking the modelling. Photo simulations are not meant to be real-world representations, but rather to illustrate the potential visual impact of the proposed Wind Energy Facility within the receiving environment. The simulations are based on the wind turbine dimensions and layout provided by the applicant in relation to the point where the photograph was taken. However, it should be understood that the calibration of the photographs also plays a role in the visualisation of the turbines. For example, the field of view and focal length of a photograph automatically changes depending on the number of individual photographs taken and stitched together to form a panoramic. This means that the turbines may appear smaller if a longer</p>

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			<p>panoramic is utilised (more photos are stitched together), which in turns results in a larger field of view and focal length being utilised. Therefore, by utilizing this specialised software, the impacts cannot be diminished nor 'under sized' as suggested, they just appear to be as different image sizes are displayed on a static A4 size of paper resulting in these images either being scaled up on down to fit on the page. Therefore, the apparent size of the turbines in the simulations (which relates directly to the visual impact of the turbines) can differ vastly depending on the size at which the image is portrayed in the report.</p> <p>While the landscapes for both Hugo and Khoe WEFs were deemed to be of high sensitivity, the proposed Khoe site was determined to be fatally flawed from a visual perspective and not supported based on the following:</p>

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			<ul style="list-style-type: none"> <li>• The overall very high to high visual impacts</li> <li>• The very high cumulative impact</li> <li>• Majority of the turbines are located on mountain and tall hills rated as having a high sensitivity</li> <li>• Majority of the stakeholders are against the project</li> <li>• The proposed Khoe WEF is located in significant proximity to sizeable established and planned tourism operations</li> <li>• Turbines are located within the buffer zones of protected areas and private nature reserves</li> <li>• The proposed Khoe WEF will result in significant loss of sense of place and uniqueness of landscape character</li> </ul> <p>Kind Regards</p>

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<p><b>13 September 2024</b></p> <p><b>Email</b></p> <p><b>NTCSA</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya</p> <p>Please share KMZ files for this project.</p> <p>Warm regards Khuluwa</p>	<p>Dear Khululwa,</p> <p>Kindly see attached KMZ files, as requested.</p> <p>Kind Regards</p>
<p><b>14 September 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya Salie,</p> <p>Thank you for your letter</p> <p>As an Interested and Affected Party, I am 100% in favour of The Hugo and Khoe WEFs, De Doorns , Western Cape Province, of South Africa.</p> <p>Kind regards.</p> <p>Dirk Uys.</p>	<p>Thank you Dirk.</p> <p>Kind Regards</p>
<p><b>16 September 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Good morning,</p> <p>Can you please have Falcon removed from this mailing list, we have confirmed that we are not an I&amp;AP as our projects do not overlap.</p> <p>Thank you.</p> <p>Kind regards, Anne.</p>	<p>Hi Anne,</p> <p>Thank you for your response. We will remove you from the mailing list.</p> <p>Kind Regards</p>

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<p><b>16 September 2024</b></p> <p><b>Email</b></p> <p><b>Western Cape Gov</b></p>	<p>Draft EIA Phase</p>	<p>Hi Sadiya Salie</p> <p>Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General.</p> <p>The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that.</p> <p>As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy.</p> <p>The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network.</p> <p>CD or USB we can still put on a physical file.</p>	<p>Hi Brandon,</p> <p>Thank you for informing us. We will send a USB, consisting of both EIAs as soon as possible.</p> <p>Kind Regards</p>
<p><b>16 September 2024</b></p> <p><b>Email</b></p>	<p>Draft EIA Phase</p>	<p>Hi Sadiya</p> <p>Thank you for your email, I have already attended to the submission of our comments. Please confirm receipt of comments already submitted.</p> <p>Kind regards H Kuhn</p>	<p>Hi Kuhn,</p> <p>Thank you for your comments.</p> <p>Kindly note that studies have been undertaken to address the points you have raised. The studies adequately assessed the following:</p> <p>Visual, including tourism Noise</p>

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			<p>Flora and Fauna Avifauna</p> <p>The comments raised will be taken forward and incorporated into the Final EIA Report.</p> <p>Kind Regards</p>
<p><b>19 September 2024</b></p> <p><b>Email</b></p> <p><b>DFFE</b></p>	<p>Draft EIA Phase</p>	<p>Good day</p> <p>Please find attached comments for the aforementioned project.</p>	<p>The EAP Acknowledges receipt thereof.</p>
<p><b>19 September 2024</b></p> <p><b>Email</b></p> <p><b>DFFE</b></p>	<p>Draft EIA Phase</p>	<p>Good day</p> <p>Our telephone conversation refers.</p> <p>This email confirms the minor error on the comment's letters with regard to the number of turbines. The correct number of turbines for Hugo are 42 turbines with the out put of 336MW and 29 turbines with the output of 232MW for Khoe.</p>	<p>Thank you Portia,</p> <p>Kind Regards</p>
<p><b>20 September 2024</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya Salie,</p> <p>Please find attached Drie Kuilen Nature Reserves comments to the EIA draft reports.</p>	<p>Hi Stefan,</p> <p>Thank you for providing us with your comments.</p>

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Email		<p>This letter serves as a formal comment from <b>Drie Kuilen Nature Reserve</b> regarding the <b>Draft Environmental Impact Assessment (EIA) Reports</b> for the proposed Hugo and Khoe Wind Energy Facilities near De Doorns, Western Cape Province, dated August 2024. We are submitting this comment under the <b>Public Participation Process (PPP)</b> in accordance with the requirements of Section 24(5) and Chapter 6 (41, 42, 43, and 44) of <b>GN R. 326 of the National Environmental Management Act (NEMA), 1998</b>, and the Western Cape Department of Environmental Affairs &amp; Development Planning (DEA&amp;DP) Guideline on Public Participation (2011).</p> <p><b>Summary of Concerns</b></p> <p>As the custodians of Drie Kuilen Nature Reserve, a formally protected area and eco-tourism destination located 3 km east of the proposed development site, we strongly oppose the construction of these wind energy facilities. Our concerns are based on the following key impacts:</p> <ol style="list-style-type: none"> <li><b>Biodiversity Risks:</b> The development poses severe threats to endangered and vulnerable species in the area, particularly the riverine rabbit, Verreaux’s eagle, blue crane, and others.</li> <li><b>Visual and Scenic Landscape:</b> The facilities will significantly disrupt the natural landscape that is crucial for eco-tourism, which forms the backbone of our economic activities.</li> <li><b>Economic Impact on Eco-Tourism:</b> The development will lead to a loss of income due to the visual and noise disturbances that will detract from the appeal of our reserve.</li> <li><b>Accessibility to the Reserve:</b> Closure of Nougaspoort Road during construction will negatively affect tourism.</li> </ol>	<p>In response to the concerns you have raised, the Final EIAR extensively assessed all the aspects, along with mitigations measures that would need to be implemented in order to reduce impacts.</p> <p><b>Biodiversity and Endangered Species</b></p> <p>Given the extensive modelling of risk by the CRM, based on a data set collected in a high species-richness and abundance year, resulting in the re-location of all turbines outside the high-risk areas by the client, the likelihood that fatalities will occur is low. For turbines proposed in medium-risk areas (i.e. in risk areas of Class 4.5), mitigation measures will be implemented.</p> <p>The negative impacts to Riverine Rabbit and Grey Rhebok are not anticipated to exceed acceptable levels. Mitigation measures provided in the Animal Species</p>



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		<p><b>Detailed Points of Objection</b></p> <p>1. Biodiversity and Endangered Species</p> <p>Camera trap surveys conducted as part of the environmental assessment on the proposed site recorded several vulnerable and endangered species, including the <b>riverine rabbit</b> and <b>grey rhebuck (Cape Nature Response, 7 February, 2024)</b>. These species are important indicators of the region's ecological health. However, the collision risk modeling identified significant risks to species of conservation concern, including the <b>blue crane (<i>Anthropoides paradiseus</i>, near-threatened)</b> and <b>Verreaux's eagle (<i>Aquila verreauxii</i>, vulnerable)</b>, among others. The estimated mortality rates for these species, even with mitigation measures, remain unacceptably high (Final Avifaunal Impact Assessment, Dr. R.E. Simmons et al., 7 August 2024). These species (excluding riverine rabbit) have also been observed on Drie Kuilen Nature Reserve, raising concerns that the proposed wind farm could have a detrimental impact on the health and sustainability of their populations. We argue that the proposed location of the wind energy facilities will lead to irreparable harm to these species, and the project should be relocated to a more suitable site where these risks can be avoided.</p> <p><b>2. Impact on Visual Landscape and Scenic Integrity</b></p> <p>Drie Kuilen Nature Reserve is located within a UNESCO-recognized <b>Cape Floral Region</b>, and the natural beauty of the landscape is a primary attraction for tourists. The <b>Visual Impact Assessment (VIA)</b> concluded that the <b>Khoe Wind Energy Facility</b> would have a <b>very high negative impact</b> on protected areas, including Drie Kuilen. Despite mitigation measures, the turbines will be visible from key viewpoints such as <b>Klipstapels</b>, severely affecting the aesthetic and</p>	<p>Specialist Report are likely to have a net-positive impact on these species through the improvement of habitat connectivity and reduced overgrazing.</p> <p><b>Impact on Visual Landscape and Scenic Integrity</b></p> <p>We acknowledge the impacts from a visual perspective. Motivation has been included in the Final EAIr, justifying the turbine locations.</p> <p><b>4. Accessibility to the Reserve</b></p> <p>The extent of the study area covers key routes and intersections within a 10 km radius near the development on which the expected traffic generated by the development may have a significant impact. Thus, the following intersections were included in the study area:</p> <ol style="list-style-type: none"> <li>1. Intersection 1: N1 and R318 (MR00295);</li> <li>2. Intersection 2: R318 and DR01442 (Road to Matroosbergstasie);</li> </ol>

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		<p>tranquil experience of our visitors (Visual Impact Assessment, Lourens du Plesis, July 2024). The cumulative visual impact of both the Hugo and Khoe Wind Energy Facilities would result in an unacceptable loss of visual resources within the region (Social Impact Assessment, Tony Barbour, August 2024).</p> <p><b>3. Economic Impact on Eco-Tourism</b></p> <p>The primary income for Drie Kuilen Nature Reserve is derived from eco-tourism, which is heavily dependent on the area’s natural and undeveloped landscape. Should the wind energy facilities be constructed, the disruptions to the views, tranquillity, and overall experience of the reserve will lead to a significant reduction in visitor numbers and a corresponding loss of revenue. International studies on the impact of wind farms on tourism in scenic areas have found that the presence of large turbines can detract from the rural character of the region and negatively impact tourism revenue. In this case, the benefits of the proposed project are <b>not site-specific</b> and could be achieved in a less sensitive location, without compromising the economic viability of local tourism (Social Impact Assessment, Tony Barbour, August 2024).</p> <p><b>4. Accessibility to the Reserve</b></p> <p>We are concerned that the construction of this project will result in the temporary closure of a section of <b>Nougaspoort Road</b>, which is vital for tourism access to Drie Kuilen. The alternative route from Touws River is often inaccessible after heavy rains, which could severely impact visitor access and, consequently, our eco-tourism operations.</p> <p><b>Request for Action</b></p>	<p>3. Intersection 3: R318 and OP05749 (Road to UITSIG); and 4. Intersection 4: R318 and OP05748 (Road to Middelberg Guest Farm).</p> <p>Nougaspoort Road will not be affected by the development.</p>

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		<p>Given the severe risks posed to biodiversity, the negative impact on the scenic landscape, and the potential economic losses to local eco-tourism, we strongly oppose the current proposal for the Hugo and Khoe Wind Energy Facilities. We urge the authorities to reject the project in its current form and consider relocating it to a more suitable area where the environmental and economic impacts will be minimized.</p> <p><b>Conclusion</b>                      We respectfully request that our concerns be fully considered in the final decision-making process for the Environmental Impact Assessment. Drie Kuilen Nature Reserve, as an important contributor to biodiversity conservation and eco-tourism, cannot support the proposed development due to the detrimental effects it will have on the region.</p> <p>For further correspondence or queries, please contact:                      Stefan Short                      SACNASP reg No. 152831                      Manager Drie Kuilen Nature Reserve manager@driekuilen.co.za                      0233582205</p> <p>Thank you for considering our comments.                      Sincerely, Drie Kuilen Nature Reserve</p> <p>Kind regards,</p> <p>Stefan Short                      Manager                      Drie Kuilen Nature Reserve</p>	
<p><b>22 September 2024</b></p>	<p>Draft EIA Phase</p>	<p>1. What's your name?                      Johan and Karen Kritzinger</p> <p>2. Who do you represent?</p>	<p>Hi Johan and Karen,</p> <p>Thank you for providing your comments.</p>

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<p><b>Aida Form</b></p>		<p>Eximia Nature Reserve Owners</p> <p>3. Your Email johank@kapelainvestments.co.za</p> <p>4. Your Phone Number +27836111482</p> <p>5. Alternative Phone Number +27828984527</p> <p>6. Your Address 34 Sapphire Way, Belvedere, Cape Town, Western Cape, 7979, South Africa</p> <p>7. What is your interest in the projects? We are the owners of the neighboring farm to the proposed Khoe Windfarm - Eximia (previously know as Kopbeensklouf)</p> <p>8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? Yes</p> <p>9. What are your comments regarding the Hugo and Khoe WEF Facilities? COMMENTRY BY EXIMIA NATURE RESERVE ON THE DRAFT ENVIROMENTAL IMPACT ASSESMENT FOR THE PROPOSED KHOE WINDFARM We herewith register our objection to the proposed Khoe Windfarm project for the following reasons:</p>	<p>The main surveys (site visit) were conducted by BBU over a 12-month period in 2022-2023. Among the Red Data (RD) species, 1014 flights were recorded in 465 hours in the WEF giving a high Passage Rate of 2.18 RD flights per hour; these were dominated by Blue Cranes <i>Grus paradiseus</i> (93% of all flights) and Verreaux’s Eagles (5%). Among Least Concern (LC) species the Booted Eagles <i>Aquila pennatus</i> were the most commonly recorded and the overall Passage Rate was 0.31 flights per hour.</p> <p>Adequate flight data were collected from seven (5 RD and 2 LC) of the 16 species to undertake the CRM analysis. The CRM assessment weighted <i>Endangered</i> RD species higher than <i>Vulnerable</i> species and all RD species were ranked higher than LC species. It also accounted for the seven Priority species’ collision-propensity, as well as habitat variables and topography, to produce a high resolution</p>

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		<p>1. Visual Impact Assessment (VIA) - We agree with the report's conclusion that from a visual perspective the windfarm is <b>FATALLY FLAWED</b> for all the reasons and supporting evidence highlighted in the VIA.</p> <p>In addition to the visual impact study and in support thereof we would like to highlight the following:</p> <ul style="list-style-type: none"> <li>The negative impact to the magnificent and uninterrupted vistas of the area.</li> <li>The lasting impact to the tranquil and undisturbed Karoo landscape and unique atmosphere.</li> </ul> <p>2. Social Impact Assessment (SIA) - We agree with the Social Impact Assessment's findings of the extremely high negative cumulative impacts and therefore that the project is <b>FATALLY FLAWED</b> from a Social Impact perspective. We support this finding based on all the matters raised and expanded on in the SIA. We would like to make the following comments in support of the findings:</p> <ul style="list-style-type: none"> <li>Negative impact to currently expanding eco-tourism in the area between the N1 and the R62.</li> <li>The area falls within the Cape Flora Region which is a World Heritage Site recognised by UNESCO.</li> <li>Tourism is one of South Africa's and especially the Western Cape's fastest growing economies.</li> <li>The resultant negative impact on current and future sustainable job opportunities because of the negative impact the Windfarm project will have on the future growth of the eco and adventure tourism industry.</li> <li>The reduced likelihood of the future investment in eco and adventure tourism in the area.</li> </ul>	<p>spatially explicit risk map giving eight levels of risk for the entire area.</p> <p>The highest risk areas (Class 5.0 and above) were strongly clumped in the eastern and northern sections, due mainly to high flight rates of Blue Cranes and Verreaux's Eagles. The risky threshold chosen (Class 5.0+) encompassed more than 75% of risky flights for two species (Verreaux's Eagles and Black Harrier), and 50% of such flight for six of the seven species. The areas are classified as too risky for development and allocated as No-Go areas. These high-risk class areas covered 67% of the area, leaving 33% of the area classified as medium- or low-risk to the Priority birds recorded, mainly in the south-west of the study site. Turbines in areas classified as risk Class 4.5 require one-tier of mitigations: either patterned-blades or shut-down-on-demand [SDOD] – automated, or human-led. Those in Class 4.0</p>

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		<ul style="list-style-type: none"> <li>• The development of the proposed Khoe WEF is not supported in the area to the south of the N1</li> <li>• The report further points out that the area does not fall within the REDZ zone, a geographical area within which wind and solar projects can occur in concentrated zones within a 35 km radius.</li> <li>• The Western Cape Provincial Spatial Development Framework highlights the importance to the province’s landscape and scenic assets and the threat posed by large scale infrastructural developments such as wind farms.</li> <li>• The Langeberg Spatial Development Framework also identifies the R318 as a scenic route and highlights the importance of preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture. Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction and promoting tourism.</li> <li>• It is also important to note that the benefits associated with the Khoe WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.</li> <li>• The Khoe wind farm in its current proposed form and structure will certainly place the continued investment at Eximia Nature Reserve at risk, eliminating its contribution to the eco-tourism and job creation in the area.</li> </ul> <p>3. Biodiversity Impact Assessment (BIA) – We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report. Wildlife and floral communities face direct mortality due to increased traffic and human presence, coupled with illegal collection, poaching, and entrapment. Avifaunal and bat species also face collision risks with turbine blades. The Vulnerable Leopard (<i>Panthera pardus</i>) and Near Threatened Grey Rhebok (<i>Pelea capreolus</i>) occur on Eximia and would face these potential dangers.</p> <p>4. The Avian Impact Assessment (AIA) - refers to the mortal danger to endemic and threatened birds of the area by the proposed windfarm.</p>	<p>require no extra mitigation. Should one <i>Critically Endangered</i> or <i>Endangered</i> bird be killed per year at any turbine then an additional tier of mitigation must be applied. For Other Red data species, the threshold triggering mitigation is 1 to 2 fatalities depending on the species.</p> <p>Since the applicant has optimised their turbine layout to (i) avoid all high-risk areas; and (ii) to minimise turbines in medium-risk areas as presented here then fatalities of all Priority species are expected to drop to &lt; 0.1 birds/year for Black Harrier (BH), Blue Crane (BC), and Martial Eagle (ME) and &lt; 0.4 birds/year for Verreaux’s Eagle (VE), Jackal Buzzard (JB) and Booted Eagle (BE). That is less than one fatality every 10 years (BH, BC and ME) to less than one every 2.5 years (VE, JB and BE). Thus, by avoiding the risk areas mapped in the spatially explicit model and micro-siting the turbines</p>

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		<p>Eximia Nature Reserve was never contacted by the team working on the AIA. We are also not sure whether the team physically visited the area or whether their study is merely a desk top based study. We base this on the fact that actual sightings are often made of certain endemic and threatened birds on Eximia Nature Reserve which are not referred to in the study.</p> <p>For instance we often observe a breeding pair of Verreaux’s Eagles with their juvenile hunting at Eximia Nature Reserve. In fact, we observed them hunting in their regular spot, today (22 September 2024) which is within the 3.0 km buffer range from turbines WTG32, WTG33 and WTG34 as required. Video footage is available for inspection.</p> <p>We also often observe Black Harriers hunting in the area where turbine WTG37 is envisaged.</p> <p>It is therefore questionable whether the information used to arrive at the buffer zones and the overall findings and mitigation recommendations of the AIA are credible.</p> <p>10. Protection of Personal Information (POPI) Act, Act 4 of 2013 Yes</p>	<p>well away from high-risk areas, fatality estimates can be reduced between 7.8-fold (Blue Crane) and 8-fold (Black Harriers) to 5-fold and 6.1-fold for Martial and Verreaux’s Eagles, respectively. This the developer has undertaken and thereby reduced the predicted fatalities substantially.</p> <p>Note the presence of a precautionary buffer for a Martial Eagle nest discovered during field work just outside the north-eastern boundary. Had this nest been active, a buffer of 5.7 km would have been required (Dr G Tate, EWT). However, observations throughout the year, and the CRM outputs, both indicate little activity. Therefore the buffer has been reduced to a precautionary 3 km, on the possibility that it becomes active in future years. This buffer also encompasses a sighting of an adult and young Black Harrier, but for which no nest site could be confirmed.</p>

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>22 September 2024</b></p> <p><b>Email</b></p> <p><b>Karen Kritzinger</b></p> <p><b>Johan Kritzinger</b></p>	<p>Draft EIA Phase</p>	<p>Good day Sadiya We would like to make sure that we have been registered now as Interested and Affected Party of the Hugo &amp; Khoe WEF Ref 0695823.</p> <p>We previously registered on the online platform , our names and comments were not included in the Draft Assessment Report.</p> <p>We own the neighbouring farm to the farm Eendrag , where the Khoe Windfarm is envisaged. Names: Johan and Karen Kritzinger Email : Johank@kapelainvestment.co.za Contact Number: 083 611 1482 or 082 898 4527 Adress: 34 Sapphire Way, Belvedere, Cape Town 7979</p> <p>I have attached our commentary</p> <p>Kind regards Karen and Johan Kritzinger kritz@icon.co.za 082 898 4527</p>	
<p><b>26 September 2024</b></p> <p><b>Email</b></p> <p><b>HWC</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya</p> <p>Thank you for the below.</p> <p>Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC. These can be reviewed and HWC can issue a final comment and close the case off.</p>	<p>Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.</p> <p>I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then</p>



Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
		<p>Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.</p> <p>Please send on to @Stephanie Barnardt as the case officer who will be in further communication.</p> <p>HWC Committee Schedule 2024</p> <p>Kind regards</p> <p>Waseefa Dhansay Assistant Director: Professional Services</p>	<p>have to be considered in the Final EIA.</p> <p>Kind Regards</p>
<p><b>27 September 2024</b></p> <p><b>Email</b></p> <p><b>CapeNature</b></p>	<p>Draft EIA Phase</p>	<p>Dear Sadiya</p> <p>Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality.</p> <p>Regards</p> <p>Rhett</p>	<p>Hi Rhett,</p> <p>Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE.</p> <p>Kind Regards</p>

**TABLE 5-24 COMMENTS RECEIVED FROM THE DFFE ON THE DRAFT EIA REPORT**

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p><b>6. Application form</b></p>	
	<p>a. If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Please note that the Department’s application form template is available on our website.</p>	<p>The listed activities represented in the final EIAR do not differ from those in the application form, which has been included in the final EIAR.</p>
	<p>b. The description of the listed activities must be project specific and include thresholds of the proposed activities where possible.</p>	<p>The description of the listed activities is specific to the project and thresholds have been included.</p>
	<p>c. The original application was for up to 290MW but has since dropped to 232MW. Please include reference for this in the report.</p>	<p>The final EIAR has been updated to include the MW reduction.</p>
	<p>d. Please shorten file names and reduce the number of compounded folders</p>	<p>This has been duly noted and file names uploaded have been shortened.</p>
<p><b>Date: 16/09/2024</b></p>	<p>7. Public Participation Process (PPP)</p>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
<p><b>Letter received via Email</b></p> <p><b>DFFE Ref: 14/12/16/3/3/2/2516</b></p> <p><b>Department of Environmental Affairs and Planning (Ms Azrah Essop)</b></p>	<p>a. A Comments and Response trail report (C&amp;R) must be submitted with the final EIAR. The C&amp;R report must incorporate all comments for this development in chronological order and ordered according to the phase comment was received in i.e. Draft scoping phase, final scoping phase etc. The C&amp;R report must be a separate document from the main report and the format must be in the table format. All comments from I&amp;APs must be responded to. A response such as “noted” is not regarded as an adequate response to I&amp;AP’s comments. Please separate comments per reporting stage clearly i.e. DSR, FSR and the draft EIAR.</p>	<p>The C&amp;R report is included in Volume III and is therefore separate from the main report. Comments received have been adequately addressed and have been tabulated in the C&amp;R report.</p>
	<p>b. Please ensure that comments from all relevant stakeholders are submitted to the Department with the final EIAR. This includes but is not limited to the relevant Provincial Department, provincial Department of Agriculture, the Local and District Municipalities, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), BirdLife SA, the Department of Mineral Resources and Energy, and the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation.</p>	<p>Comments have been received the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation for the draft EIA Phase.</p> <p>Please note numerous follow up calls and emails were sent to Western Cape Government and HWC. Please refer to Volume III for proof.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>c. The final EIAR must comply with all conditions or comments of the acceptance of the scoping report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA). The final EIAR must address all comments received on the SR and the draft EIAR. Proof must be provided in terms of communications. Please include the original copies of the comment letters received.</p>	<p>The Final EIAR has considered the comments received during scoping phase.</p>
	<p>d. Confirm whether comments from this Department only, were received on the final Scoping report. All the other comments contained in the WEF PPP report are from the draft scoping phase.</p>	<p>No comments were received from other organs of state on the FSR. Comments has been received as part of conditions to the acceptance of the FSR and has subsequently been included into the CRR</p>
	<p>e. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the NEMA EIA Regulations, 2014, as amended. Proof of all public participation activities must be included in the final EIAR.</p>	<p>The public participation process for the Hugo WEF has been conducted in terms of Regulation 39, 40 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p>
	<p>f. Include the timeframes for all aspects of the PPP e.g. DSR commenting phase was from XXX to XXX; FSR comment phase, adverts, etc.</p>	<p>This has been updated in the Final EIAR and Public Participation report. Please refer to Volume I: Section 9 and Volume III.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>g. The comments and responses report included has missing 'formatting' aspects i.e. there are column lines missing which separate columns of text. Furthermore, the text is difficult to read as it is copied and pasted without formatting and numbering. This makes reviewing the document difficult. Please improve the formatting of this document.</p>	<p>This has been updated and revised in the Final EIAR. Please refer to Volume III.</p>
	<p>h. Ensure that the details of the I&amp;AP commenting are clear in the Comments and Responses table (Volume II of the draft EIAR). This column should include the date of comment, phase of the project; the name of the person commenting, and the company represented.</p>	<p>This has been updated and revised in the Final EIAR. Please refer to Volume III</p>
	<p>i. Provide clarity if Drie Kuilen Nature Reserve was included in the I&amp;AP database and notified of the availability of the reports from the draft SR phase.</p>	<p>Registration details of Drie Kuilen Nature reserve was sent to ERM by the assigned social specialist on the 9<sup>th</sup> April. By that date, the public participation for the scoping phase had been concluded (29 February and 02 April 2024).</p> <p>Drie Kuilen Nature Reserve was included as an I&amp;AP during the EIA phase of the Project.</p>
	<p><b>8. Final Layout Maps</b></p>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>a) All available biodiversity information must be used in the finalisation of the final layout map. Existing infrastructure must be used as far as possible, e.g. roads.</p>	<p>Please refer to Figure 2,of the Final EIAR</p>
	<p>b) It must be emphasised that the final EIAR must include a final layout map (clearly labelled and annotated) which adheres to specialist recommendations as well as the identified no-go areas, must be included. Failure to provide a final layout map may be a fatal flaw to the decision-making process.</p>	<p>Your comment has been noted and several figures have been included in Volume I of the Final EIAR</p>
	<p>c) If possible, in addition to the included sensitivity maps, please provide a cumulative sensitivity map which shows the range of sensitivity from low to very high. This will allow for an overview of the designated sensitive layers.</p>	<p>Please refer to Figure 8 of the Final EIAR.</p>
	<p>d) The map provided titled: Figure 7 0695823-GIS-010 Hugo Sensitivity _ Cumulative, must be submitted at a finer scale.</p>	<p>Figure 7 has been revised. Please see Volume I: Final EIAR</p>
	<p><b>9. Specialist Reports</b></p>	
	<p>c) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and</p>	<p>Specialist studies are final, with no further studies recommended.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>recommendations, and must not recommend further studies to be completed post EA.</p>	
	<p>d) Findings and recommendations of the specialist studies must be incorporated with the final report and the EMPr for decision making. Additionally, the EAP must clarify which mitigation measures recommended by specialists cannot be implemented if the current layout is maintained.</p>	<p>Specialist studies has been incorporated in the final report and EMPr. Additionally, the site is considered fatally flawed from a visual perspective. However, EAP motivation for the turbine locations have been included in the Final EIAR.</p>
	<p>e) Visual: The site is situated along the R 318, a designated tourist route as per the Langeberg Spatial Development Framework (SDF) (2023). Additionally, the area hosts several provincial and private nature reserves, as well as tourist facilities. The Visual Impact Assessment indicates that <i>'28 of the 38 proposed turbines for the proposed Khoe WEF are still positioned in mountains and tall hills identified as having a high visual sensitivity and where development in these buffers is not considered best practice and should be avoided. Owing to the extremely close proximity of sensitive visual receptors to the proposed Khoe WEF, turbines placed on elevated terrain, such as mountains and tall hills, exacerbate the already very high visual impact on these receptors. As such, turbines placed on these areas will not be supported.'</i></p> <p>The motivation provided by the EAP on page 356 of the draft EIAR is acknowledged, however it requires further detail. The EAP motivation for</p>	<p>EAP motivation has been revised to encompass all turbines located in high sensitivity visual areas, as well as those in the Matroosberg Catchment Area. Please see updated and revised Section 12.10 of the Final EIAR.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>Khoe WEF must be expanded and all the aspects raised in objection by the visual specialist, must be responded to clearly.</p> <p>The EAP motivation should be revised to specify the exact turbine numbers and address all turbines located in high sensitivity areas, not only in terms of visual impact but also considering other sensitive regions, such as the protected Matroosberg Mountain Catchment Area.</p>	
	<p>f) <i>Section 13.1 of the draft EIAR: This section mentions conditions to be included as quoted from the Freshwater and Wetlands, Bats, Heritage and Archaeology and Palaeontology impact assessments only. Please elaborate on why the remaining specialist assessments and/or recommendations have not been included in this section.</i></p>	<p>The Final EIAR has been updated to include conditions and recommendations for noise, avifauna, socio-economic, traffic and transportation and visual/landscape.</p>
<b>Environmental Management Programme</b>		
	<p>a) The final EMPr must also include the following:</p> <ul style="list-style-type: none"> <li>• All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted.</li> </ul> <p>An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.</p>	<p>Detailed recommendations and mitigation measures are included in the EMPr.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>b) In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.</p>	<p>The EMPr complies with Appendix 4 of the EIA Regulations, 2014, as amended.</p>
	<p>c) Ensure that a signed version of the generic EMPr for the substation are submitted with the final EIAR. This is over and above the EMPr for the facility. Please ensure that the Generic EMPr for the substation is submitted as a separate signed PDF document and not contained as part of the EMPr document 0695823_Khoe WEF EMPr_20240823.</p>	<p>This Generic EMPr has been signed by the applicant and included as a separate signed document.</p>

TABLE 5-25 BIODIVERSITY CONSERVATION RESPONSES ON THE DRAFT EIA PHASE

Date of comment, format of comment, name of organisation / I&AP		Response from EAP / Applicant / Specialist
	<p>The proposed Khoe WEF will be located near De Dooms in the Western Cape Province and include up to 29 turbines and have a maximum output of 290 MW. The development will also include access roads and internal roads, a Battery Energy Storage System (BESS), Operations and Maintenance (O&amp;M) building, On-Site Substation (OSS) and temporary site office.</p> <p>According to the EIA screening tool the site is predominantly classified as Low Sensitivity, while remaining areas are classified as Very High Sensitivity. This is due to the intersection of the PAOI with various important biodiversity areas including Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and Freshwater Ecosystem Priority Areas (FEPA) associated with the Langeberg-Wes Mountain Catchment. Small areas identified as CBAs are due to the presence of aquatic features that maintain</p>	

Date of comment, format of comment, name of organisation / I&AP		Response from EAP / Applicant / Specialist
	<p>important ecological balance and processes that are essential in supporting biodiversity conservation. None of the WTG occur in the CBA, and are mostly distributed in ESA 1 and ESA2, with some In areas not marked as important plant areas. The entire proposed KHOE wind farm area as of High Sensitivity for the Animal Theme. This is based on the potential presence of the following RD species: Martial eagle, Verreaux's Eagle, Southern Black and Korhaan.</p> <p>The Directorate has noted that the revised turbine layout provided (July 2024) left 29 of the (April) 31 turbines completely avoiding all risk Classes 5.0 and above. Risk is concentrated in the central and northeast sections of the proposed site and, thus, the placement for most of the turbines to the west and south-west of the site. To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on sensitive and highly localised habitats are minimized or avoided altogether Furthermore, the following recommendations must be considered in the final report:</p>	
	<p>No construction camps, temporary or permanent laydown areas or any activities associated with the development are to be located within the important conservation areas.</p>	<p>The EAP acknowledges receipt of comment from the Departments Biodiversity Mainstreaming &amp; EIA directorate. The recommendations by the Directorate is acknowledged and have subsequently been added to the EMPr and FEIAR.</p>
	<p>The development footprint must avoid the highly sensitive areas with their respective buffer zones.</p>	<p>The avoidance of high sensitivities and buffer zones of the development footprint are stipulated in the Final EIAr.</p>

Date of comment, format of comment, name of organisation / I&AP		Response from EAP / Applicant / Specialist
	Prevent the further loss and fragmentation of vegetation communities and the high biodiversity areas in the vicinity of the study area.	The prevention and further loss and fragmentation of vegetation communities and the high biodiversity areas are stipulated in the Final EIAr.
<p><b>Date: 19/09/2024</b></p> <p><b>Letter received via Email</b></p> <p><b>DFFE Ref: 14/12/16/3/3/2/2516</b></p> <p><b>The Directorate: Biodiversity Conservation</b></p>	Maintain ecological processes at all scales and avoid or compensate for any effects of land uses on ecological processes.	Stipulations of the maintenance of ecological processes at all scales are included in the Final EIAr.
	Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.	Stipulations for disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants are included in the Final EIAr.
	Care must be taken to avoid the re-introduction and spread of alien invasive species.	This comment has been duly noted and has been stipulated in the Final EIAr.
	Minimize land use types that reduce ecological resilience (ability to adapt to change), particularly at the level of water catchments.	This comment has been duly noted and has been stipulated in the Final EIAr.
	Implement land use and land management practices that are compatible with the natural potential of the area.	This comment has been duly noted and has been stipulated in the Final EIAr.
Permit from relevant authorities must be obtained prior commencement of any construction activities for the disturbance or removal of any nationally or provincially protected species.	Permits from relevant authorities will be obtained prior commencement of any construction activities and has been stipulated in the Final EIAr.	

Date of comment, format of comment, name of organisation / I&AP		Response from EAP / Applicant / Specialist
	<p>A Search and Rescue Plan to remove and relocate protected species Identified within the study area must be developed by a professional and qualified ecologist.</p>	<p>A Search and Rescue Plan will be developed by a qualified ecologist prior to construction.</p>
	<p>The facility must be designed in a manner such that infrastructure components that could be used as perching or roosting substrates by birds and bats must be prohibited.</p>	<p>This comment has been duly noted and has been stipulated in the Final EIAr.</p>
	<p>Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g. grasslands, rivers, wetlands, and dams). The input of an avifaunal specialist must be obtained. For the fitting of the anti-collision devices onto specific sections of the line once the exact positions of the towers have been surveyed and pegged. Additional areas of high sensitivity along the preferred alignment must also be identified by the avifaunal specialist for the fitment of anti-collision devices. These devices must be according to Eskom's Transmission and EWT's Guidelines</p>	<p>This comment has been duly noted and has been stipulated in the Final EIAr.</p>
	<p>A construction and operation monitoring plan must be developed and be implemented to survey impacts resulting from the infrastructure installation on the bird communities, as well as continue to gather information on the bird communities present in the area and monitor the effectiveness of the mitigation measures for a minimum duration of at least three years during operation.</p>	<p>This comment has been duly noted and has been stipulated in the Final EIAr.</p>

Date of comment, format of comment, name of organisation / I&AP		Response from EAP / Applicant / Specialist
	<p>An avifauna monitoring program to determine the actual impacts on the high priority birds for a minimum of three years must be developed and be implemented. This must be done according to the latest SABMP's guidelines.</p>	<p>This comment has been duly noted and has been stipulated in the Final EIAr.</p>
	<p>A pre-construction walk through on the selected power line alignment by avifaunal specialist and ecologist, must be conducted to ensure that the micro-siting of the power line has the least possible impact, there are no nests sites of priority species on or close to the construction corridor and all species of conservation concern which might be impacted are identified. This is to ensure that the correct permits are applied for but also to Identify any new features (such as nests) prior to the commencement of the construction phase.</p>	<p>The powerline will form part of a separate application, thus will be accessed accordingly.</p>

TABLE 5-26 RESPONSE TO COMMENTS FROM THE HERITAGE WESTERN CAPE IN THE DRAFT EIA PHASE

Date of comment, format of comment, name of organisation / I&AP	Phase of PPP	Comment	Response from EAP / Applicant / Specialist
<p><b>25 September 2024</b> <b>Email</b></p>	<p>Draft EIA Phase</p>	<p>HERITAGE IMPACT ASSESSMENT: PROPOSED KHOE WEF ON PORTIONS 1, 2 AND 11 OF FARM</p>	<p>Thank you Waseefa.</p>

<p><b>HM/CAPE WINELANDS/ BREDE VALLEY &amp; LANGE BERG / TOUWSRIVER &amp; MONTAGUE/ VARIOUS FARMS</b></p> <p><b>Waseefa Dhansay</b></p>		<p>38 (EENDRAGT), FARM 193 AND REMAINDER OF FARM 37 (EENDRAGT), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)</p> <p>The matter above has reference.</p> <p>This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024</p> <p>FINAL COMMENT:</p> <p>The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA, but does not support the proposed activity, given the anticipated of impact of the activity upon the Cultural landscape.</p> <p>The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).</p> <p>HWC reserves the right to request additional information as required.</p> <p>Should you have any further queries, please contact the official above and quote the case number.</p>	<p>Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.</p> <p>There are currently no approved WEF facilities adjacent to these proposed projects.</p> <p>Kind Regards</p> <p>Hi Waseefa,</p> <p>Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.</p> <p>Kind Regards</p>
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## APPENDIX A I&AP DATABASE

AFFILIATION TO PROJECT	FARM / DEPARTMENT / ORGANISATION NAME	FARM PORTION	NAME	SURNAME	OTHER	EMAIL ADDRESS	TELEPHONE	OTHER PHONE	ADDRESS	POSTAL ADD.	CITY	CODE	COMMENT	RETURNED EMAIL ADDRESSES	SG CODE
<b>1. Directly Affected Landowner</b>															
Associated Infrastructure	Pias	0/193	Johan	Le Roux	JH Le Roux	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						CS050000000001930000
Associated Infrastructure	Eendragt	0/37	Johan	Le Roux	SML Le Roux	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						CS050000000000370000
Associated Infrastructure	Eendragt	1/38	Hennie	De Kock	Sandvliet Trust	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						CS050000000000380001
Associated Infrastructure	Eendragt	2/38	Hennie	De Kock	Sandvliet Trust	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						CS050000000000380002
Associated Infrastructure	Eendragt	11/38	Hennie	De Kock	Sandvliet Trust	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						CS050000000000380011
<b>2. Surrounding Landowners</b>															
<b>3. National and Provincial Government Departments</b>															
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Muhammed	Eaop	Assistant Director at Department of Environmental Affairs	[REDACTED]									
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Milcent	Solomons	Director: Strategic Infrastructure Development	[REDACTED]									
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)				Deputy Director: Integrated Environmental Authorisations										
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)				Environmental Case Officer										
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Tebogo	Kgaphola	BDC Department	[REDACTED]									
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Portia	Makita	BDC Department	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Soska	Lekota	BDC Department	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Stanley	Tshilwamulomoni	Chief Directorate: Biodiversity Section	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	Department of Agriculture, Land Reform and Rural Development (DALRRD)				National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	Department of Agriculture, Land Reform and Rural Development (DALRRD)		Andie	Hawes	Deputy Director General	[REDACTED]									
National Government	Department of Agriculture, Forestry and Fisheries (DAFF)		Anneliza	Colet		[REDACTED]									
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Ephron	Maandwa	Integrated Environmental Authorisations	[REDACTED]									
National Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Nelsia	Ndabeni	Environmental Control Officer	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Nelly	Letshobanye	National Government Corporate Services	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Rashid	Khan	Western Cape	[REDACTED]									
Provincial Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Torch	Thembisa	Western Cape	[REDACTED]									
Provincial Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Jozile	Vuykadzi	Western Cape	[REDACTED]									
National Government	National Department of Mineral Resources and Energy (DMRE)		Pieter	Swart	Provincial Government	[REDACTED]									
National Government	National Department of Mineral Resources and Energy (DMRE)		Hwabisa	Qwenyathle	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Mineral Resources and Energy (DMRE)		Jacob	Mbele	Director General	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Mineral Resources and Energy (DMRE)		Ethel	Sindumule	National Government	[REDACTED]									
National Government	National Department of Mineral Resources and Energy (DMRE)		Molife	Morokane	National Government	[REDACTED]									
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Aphwe	Fayindiala	National Government	[REDACTED]									
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Katshaba	Goolthwe	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Energy (DoE)		Mpho	Mabaso	Director: Renewable Energies	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Public Works		Basson	Geldenhofs	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Social Development		Robert	Macdonald	Provincial Government, Head of department	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Social Development		Keith	Stuurman	Local Municipality, Community Services Director	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Social Development		Shama	Mabina	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Transport		R.C	Barlow	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Cooperative Governance and Traditional Affairs		Collen	Malatji	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Cooperative Governance and Traditional Affairs		Legadima	Leso	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Department of Communications and Digital Technologies		Nokuthula	Nqaba	National Government	[REDACTED]									
National Government	National Department of Government Communication and Information Systems		Christpin	Phai	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
National Government	National Commission on Restitution of Land Rights		Natasha	Romain	National Government	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department: Environmental Affairs and Development Planning (DE&DP)		Gottlieb	Arandse	Director: Environmental Quality Management	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department: Environmental Affairs and Development Planning (DE&DP)		Zaahir	Toefy	Development Management Region 1	[REDACTED]									
Provincial Government	Western Cape Department: Environmental Affairs and Development Planning (DE&DP)		Zaidah	Toefy	Environmental Governance	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department of Economic Development and Tourism		Solly	Fourie	Head of Department	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department: Transport and Public Works					[REDACTED]									
Provincial Government	Western Cape Department: Agriculture		Dr Mogale	Sobopetsa	Head of Department	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department: Agriculture		Bongiswa	Maleti	Economic Services	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department of Agriculture		Hennis	Germishuys	LandCare	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department of Agriculture		Rudolph	Rooscher	District Manager: Cape WineLands	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape: Development and Tourism		Crystal	Lebron	Office of the Head of the Department	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department of Agriculture		Fadwa	Mohammed	Land Use Management	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						
Provincial Government	Western Cape Department of Agriculture		Cor	van der Walt	Land Use Management	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]						











APPENDIX B

SITE NOTICES AND POSTER PLACEMENT  
PROOF



DATE	22 February 2024
ERM REFERENCE	0695823
SUBJECT	Proof of Site Notices



**Breede Library**



**Grow Up Cash & Carry – De Doorns**



**Site 1 – 33°30'43.78" 19°49'02.24"**



**Site 2 – 33°27'35.47" 19°49'50.37"**

**Site 3** – 33°25'23.57" 19°51'29.52"**Site 4** – 33°36'13.98" 19°49'40.01"**Site 5** – 33°35'14.02" 19°56'11.74"



APPENDIX C      NEWSPAPER ADVERTISEMENT PROOF



INTERCEPTIONS

# Zim, SA border chiefs meet amid row

OKUHLE HLATI  
okhule.hlati@inl.co.za

CO-OPERATION and relations between South Africa and Zimbabwe is critical in resolving challenges shared at the border by the two countries.

These were the words by Border Management Authority (BMA) commissioner Michael Masiapato at a briefing in Pretoria yesterday as they are hosting the Zimbabwe Border Ports Authority (ZBPA).

Zimbabwe is in the process of developing a Border Ports Authority Bill with the aim of officially establishing the ZBPA.

The visit aims to showcase South Africa's model of administration and border management co-ordination.

The visit comes as officials from the two countries have been at odds over the number of undocumented Zimbabwean children intercepted on buses at the Beitbridge border post.

MBA alleged there were 443 children below the age of 8 years who were handed over to Zimbabwe authorities.

But the neighbouring country's Ministry of Public Service, Labour and Social Welfare said the number was inflated as this was not corresponding with their number of 124 during the period November 25 to December 3, 2023.

Masiapato said: "The co-operation and relations between South Africa and Zimbabwe in managing our shared borders is very critical for the

protection of our respective national interests.

"As such, we have a collective responsibility to prevent illegal activities at our ports of entry and the border law enforcement areas such as illegal migration, any kind of smuggling, human trafficking, and all kinds of cross border crimes inclusive of the illegal movement of weapons, and or illicit goods between our countries.

"This meeting is a demonstration of the commitment to address our common challenges and a quest to improve the quality of life for citizens in both our countries.

"The engagements should go beyond just bureaucratic procedures but must embody the spirit of partnership and shared aspirations to work

together for the better management of our border environment."

The commissioner said the BMA was committed to sharing some lessons from their journey of 15 years since their establishment.

"We do believe that moving away from a multi-agency approach to an integrated border management model with a single command and control is the key step towards effective border management," he added.

The ZBPA director-general Nicholas Dube said they wanted to go back to their country with a good report after learning from the BMA and also ironing out the misunderstanding of the undocumented children.

Dube is accompanied by his delegation consisting of representations from

various spheres including lawyers, police and immigration and home affairs officers.

"We congratulate the BMA for their inauguration and now being operational. We are still in the process of also being established and that is why we came here. I came with people from different spheres of government and will go back more informed," Dube said.

"Our visit to benchmark our proposed border post authority with the BMA is a testimony that our countries not only share a common and the busiest border post in Southern Africa but an inseparable destiny as well. We are hoping that after benchmarking our lawyers will be able to present to parliament."

LEGISLATION

## 'Ending discriminatory laws long overdue'

from page 1

Indians and coloureds) should be treated as one group," Hendricks said.

Glen Snyman, founder and leader of People Against Race Classification (Parc), said: "The minister does not answer the question. He should say 'when' will be the end of this. What we as Parc say is, end these discriminatory laws immediately! It's long overdue.

"It is a job reservation for 'black' people only, but the current legislation discriminates against a new generation of children that was born many years after apartheid."

Policy analyst Nkosikhulule Nyembezi said for a democracy to work in redressing the injustices of the past and improving the quality of life of all citizens, people could not just be exposed to racial neutral information that was presented to them as correct.

"They need to know about and be involved in targeted measures to promote racial equality and human dignity in the workplace and see how such policies or facts relate positively to their lives," Nyembezi said.

"A little under 30 years of our democracy, we should mark our calendars and remember that race classification in labour laws is some gesture that is necessary but never sufficient.

"By all means, keep race classification in labour laws for as long as it is necessary, but think of the classification, as the drafters of the Constitution desired, as temporary markers of wins in a game where the ultimate goal is to beat racial inequality and human indignity," Nyembezi said.

NATION

## Consumers facing gloom festive season

from page 1

"We forecast inflation to hover between 5% and 5.5% in the first half of next year before falling more convincingly towards the midpoint of SARB's target range during the third quarter and averaging 5% in 2024," Khosa said.

"However, the risks to our forecasts reside marginally to the upside due to the uncertainties surrounding the outlook for oil prices, food prices and the rand."

Anchor Capital investment analyst Casey Delpont also concurred that inflation would continue to moderate gradually.

However, Delpont said the outlook faced significant upside risks, particularly regarding food prices.

"The emergence of the El Niño-Southern Oscillation (Enso), which typically implies below-average rainfall for SA, poses a risk of higher food prices.

"At the same time, renewed geopolitical tensions in the Middle East raise the risk of oil prices staying elevated for longer," Delpont said.

"Furthermore, the rand will face headwinds from the expected deterioration in the government's fiscal position and growing uncertainty as the country enters a precarious political environment ahead of next year's national election."

Weekly pricing from the Red Meat Producers Organisation shows an increase in the price of beef.

From October 6 to December 8, A2/3 beef increased from R53.45 to R55.80, while C2/3 beef rose from R47.20 to R48.37.

CRIME

## Fourteen suspects in alleged financing scheme face fraud, money laundering charges

OKUHLE HLATI  
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FOURTEEN suspects who allegedly operated an illegal asset financing scheme are expected to appear in the Stellenbosch Magistrate's Court today on charges that include money laundering to the tune of R40 million.

Members of the alleged syndicate, two women and 12 men, were arrested in the early hours of yesterday by police during an integrated operation.

They were charged with fraud, theft and money laundering.

According to police spokesperson Joseph Swartbooi, local financial institutions sounded the alarm about a syndicate operating a "huge asset financing scheme".

Swartbooi said: "Reports suggested that the members of this syndicate would create and submit false vehicle finance applications to motor dealerships with whom they had a corrupt relationship.

"Armed with the information at their disposal, a multi-disciplinary team of detectives attached to the Provincial Commercial Crime Investigation Unit conducted an extensive investigation."

Following a thorough probe into the matter they made a breakthrough.

"On December 13, police members who formed part of an integrated operation, arrested the suspects.

"As part of the ongoing investigations the possibility of more arrests is not excluded," Swartbooi said.

Provincial police commissioner Thembilile Patekile commended the officers.

Patekile expressed his confidence that the unit's work should pave the way for a conviction and ultimately a hefty sentence that "should serve as a deterrent to criminals in the Western Cape".

Recently the Hawks arrested a 44-year-old woman in connection with vehicle fraud amounting to more than R4m.

Hawks spokesperson Zinzi Hani said that this was after officers were alerted to allegations that the suspect, with her husband, both directors of the company, were using fraudulent documents to purchase vehicles between 2019 and 2023.


Hani said: "It is reported that the suspects were involved in a vehicle-purchase scheme by applying for hire-purchase finance from banking institutions using fraudulent documents.

"These were submitted via a dealership in targeting the balloon car payments option, resulting in them changing the vehicle ownership from various licensing departments around Gauteng and the Western Cape provinces into their company."

Hani said the bank uncovered the scheme and reported it to the Hawks.

SPORT PAGES 15 & 16

**VACANCY**

  
**COMMUNICATIONS MANAGER**  
FOR THE PRESS COUNCIL OF SOUTH AFRICA

**The Press Council is looking for a person with journalism, marketing and social media skills to promote the Press Council and its adjudication and mediation processes amongst publishers and the public. The successful candidate will be based at the Press Council's offices in Craighall, Johannesburg, and be appointed on a renewable fixed-term contract of one year.**

**Key responsibilities and duties:**

- Create and implement communication strategies to promote the Press Code, complaints procedures and findings amongst subscriber members, government, business, civil society organisations and the public.
- Day-to-day management and content updates of the Press Council's website, social media profiles and newsletters.
- Planning and execution of outreach programmes including public events, webinars and conferences.
- Promotion of the role and work of the Press Ombuds; Public Advocate and Executive Director.
- Producing/writing of articles, media releases, regular reports, multimedia content and other communication and marketing material.
- Assisting subscriber publications to actively promote the Press Code, complaints mechanisms and the Press Council's activities.

**Requirements:**

- An understanding of the role and work of the Press Council and a commitment to Constitutional values of freedom of expression and media freedom.
- Journalism experience and/or journalism qualifications.
- Excellent verbal and writing skills in English. Additional South African languages will be an advantage.
- Proven expertise in online, multimedia and social media production.
- A track record of media related communication, marketing and social media activities.
- Demonstrable strategic, organisational and project management skills.
- The ability to work independently and under pressure.
- A valid driver's licence and willingness to travel, if needed.

**Other:**

- The successful candidate will receive a market-related remuneration package which includes annual leave. Provision for retirement to be discussed with the candidate.
- The successful candidate will report to the Executive Director and be required to sign a performance agreement.

**CLOSING DATE:  
15 JANUARY 2024**

**How to apply:**  
Submit your application in the form of a motivation (please include links to your online work and social media profiles) and CV of no more than 5 pages in total.

**Email:**  
millicentg@ombudsman.org.za

**Telephone:**  
011 484 3612

[www.presscouncil.org.za](http://www.presscouncil.org.za)

**ERM Reference Number:0695823**  
**Environmental Impact Assessment for the Proposed Establishment of the Hugo Wind Energy Facility and Associated Infrastructure, Western Cape Province**

**INVITATION TO REGISTER AND COMMENT**

Environmental Resources Management Southern Africa Pty Ltd (ERM) was appointed by Energy Team Pty Ltd (hereafter 'ET') to conduct an Environmental Impact Assessment (EIA) for the proposed establishment of the Hugo wind energy facility (WEF) and associated infrastructure in the Western Cape Province. This Project requires an Environmental Authorisation (EA) from the Department of Forestry, Fisheries and Environment (DFFE) in terms of the National Environmental Management Act (Act No. 107 of 1998), as amended (NEMA). The proposed Project triggers the following Listed Activity:

- **Listing Notice 1 (LN1):** Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017.
- **Listing Notice 2 (LN2):** Scoping and EIA (S&EIA) of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017.
- **Listing Notice 3 (LN3):** Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017.

"Based on the project understanding, the project triggers listed activities of Listing Notice 2 and is therefore subject to a full Scoping and Environmental Impact Assessment (S&EIA) Process."

This notification serves to announce the commencement of the Scoping and Environmental Impact Assessment process. The Draft Scoping Report will be compiled and is released to the public for a 30-day comment period from 8 January - 8 February 2024. The Draft Scoping Report will be compiled in accordance with the regulatory requirements stipulated in the EIA Regulations, 2017 (GN R 326 of April 2017) promulgated in terms of Section 24(5) of NEMA.

Stakeholders are invited to register as an Interested and Affected Parties (I&APs) and to participate in the S&EIA processes by identifying issues of concern and providing comments on the project. Registered I&APs will be kept informed about the Project.

**To register as an I&AP and to obtain more information, please contact Khosi Ngema at ERM:**  
**Email:** Khosi.Ngema@erm.com  
**Website:** erm.com

**ERM Verwysings Nummer:0695823**  
**Omgewings Impak Bepaling vir die Voorgestelde Stigting van die Hugo Wind Energie Fasiliteit en Geassosieerde Infrastruktuur, Weskaap Provinsie**

**UITNODIGING OM TE REGISTREER EN KOMMENTAAR TE LEWER**

Environmental Resources Management Southern Africa Edms Bpk (ERM) was aangestel deur Energy Team Edms Bpk (Hierna 'ET') om die Omgewings Impak Bepaling (EIA) vir die voorgestelde stigting van die Hugo Wind Energie Fasiliteit (WEF) en geassosieerde infrastruktuur in die Weskaap Provinsie uit te voer. Die Projek vereis 'n Omgewings Magtiging (EA) van die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingevolge die Wet (Wet Nr. 107 van 1998) op Nasionale Omgewingsbestuur, soos gewysig (NEMA). Die voorgestelde Projek aktiveer die volgende Kennisgewing Aktiwiteit:

- **Noterings Kennisgewing 1 (LN1):** Basiese Assessering (BA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.
- **Noterings Kennisgewing 2 (LN2):** Omgangbepaling en EIA (S&EIA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.
- **Noterings Kennisgewing 3 (LN3):** Basiese Assessering (BA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.

"Gebasseer op begrip van die projek, aktiveer die projek die gelyste aktiwiteite van Noterings Kennisgewing 2 en is dus onderwerp aan 'n volledige Omgangbepaling en Omgewings Impak Bepaling (S&EIA) proses."

Die doel van hierdie kennisgewing is om die aanvang van die Omgangbepaling en Omgewings Impak Bepaling proses aan te kondig. Die Konsep Omgangbepaling Verslag sal saamgestel word en aan die publiek vrygestel word vir 'n 30-dae kommentaar tydperk vanaf 8 Januarie - 8 Februarie. Die Konsep Omgangbepaling Verslag sal saamgestel word in ooreenstemming met die regulerende vereistes soos bepaal in die EIA Regulasies, 2017 (GN R 326 van April 2017) gepromulgeer ingevolge Artikel 24(5) van NEMA.

Belanghebbendes word genooi om te registreer as Belangstellendes en Geaffekteerde Partye (I&APs) en deel te neem in die S&EIA proses deur kwessies van kommer te identifiseer en kommentaar oor die projek te lewer. Geregistreerde I&APs sal op hoogte gehou word van die Projek.

**Om te registreer as 'n I&AP en meer inligting te bekom, kontak asseblief vir Aneesah Alwie by ERM:**  
**E-pos:** Khosi.Ngema@erm.com  
**Webwerf:** erm.com

**ERM Reference Number:0695823**  
**Environmental Impact Assessment for the Proposed Establishment of the Khoe Wind Energy Facility and Associated Infrastructure, Western Cape Province**

**INVITATION TO REGISTER AND COMMENT**

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**Om te registreer as 'n I&AP en meer inligting te bekom, kontak asseblief vir Khosi Ngema by ERM:**  
**E-pos:** Khosi.Ngema@erm.com  
**Webwerf:** Erm.com



**EMAIL  
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@INL.CO.ZA  
FOR TIP-OFFS**





## Karateka bevorder

Die Kushido Robertson-karateskool het die laaste gradering vir 2023 gehad. Die studente het baie goed gevaar en almal teenwoordig is bevorder na 'n ander vlak. Mikhail Malgas (agter, vierde van links), is na bruin gordel bevorder. Op die foto links is die Kushido Robertson-familie – die studente saam met hul ouers. Die karateskool bestaan al van 1983 af en staan tans onder leiding van Kyoshi Ronald Lekay (derde van links), Kyoshi Freddy Williams (derde van regs) en Sensei John Moore (vierde van links). Dit is ook die afsluiting van die amptelike werksaamhede vir 2023. Beginners word in begin Februarie 2024 ingeneem.

# Clovers-krieket brul behoorlik

Luciano du Toit

Clovers Krieketklub het behoorlik gebrul die afgelope vyf naweke. Dit volg nadat die klub, wat al klub is met twee spanne in die Burgemeester Vlakkiekrieket-kompetisie, hulself goed van hul taak gekwyt het in die eerste ronde.

Die A-span van Clovers bevind tans hulself bo-aan die punteleer in hul groep danksy vyf wenne in vyf wedstryde terwyl die B-span hulself derde bevind. Op Sondag 10 Desember moes Orchard United met hul stert tussen hul bene terugkeer huis toe nadat die A-span behoorlik met hulle afgereken het. Dis danksy indrukwekkende boulwerk deur die boul-aanval van Clovers met die veteraan, Warren Davids, wat twee paaltjies laat kantel het sowel as Meshaan Charlies. Orchard United kon 'n billike 92 lopies

aanteken in hul 15 toegelate boulbeurt. Vir Orchard United het Alvirno Bosman uitstekend gevaar met 52 lopies. Ten einde laaste was die 92 lopies hopeloos te min vir die ervare kolwers van die Roodewaliete. Mario Marinus het gesorg vir 'n blitsige 54 lopies terwyl die speler van die wedstryd, Warren Davids, 38 lopies bygedra het. Dit het Clovers A laat wegstap met 'n oorwinning van 10 paaltjies in slegs 14 boulbeurt.

Op 'n warm dag het Clovers Krieketklub hulself laat geld. Volgens Fyrin Hendricks, kaptein van Clovers, is die span op 'n goeie plek. Maar hy bevestig ook dat die span nog absoluut niks bereik het nie. "Ek dink dis belangrik om dit wedstryd vir wedstryd te vat. Dis wat nog al die pad vir ons gewerk het en dis die filosofie wat ons tans het. Ek besef dat hoogmoed gou-gou aan jou deur kan klop met so baie oorwinnings, maar ons is ervare genoeg om ons self nederig te hou."



Die Clovers-span is (van links): Agter: Eathan Jass, Romano Adams, Vaughan Jansen, Fyrin Hendricks, Rayloon Steenberg en Mario Marinus. Voor: Etthienne Jansen, Lee-Zario Booyesen, Lurick Cupido en Ricardo Cupido. Foto: Luciano du Toit

## Khoe Wind Energy Facility and Associated Infrastructure

ERM Reference Number: 0695823

Environmental Impact Assessment for the Proposed Establishment of the Khoe Wind Energy Facility and Associated Infrastructure, Western Cape Province

### INVITATION TO REGISTER AND COMMENT

Environmental Resources Management Southern Africa Pty Ltd (ERM) was appointed by Energy Team Pty Ltd (hereafter 'ET') to conduct an Environmental Impact Assessment (EIA) for the proposed establishment of the Khoe wind energy facility (WEF) and associated infrastructure in the Western Cape Province. This Project requires an Environmental Authorisation (EA) from the Department of Forestry, Fisheries and Environment (DFFE) in terms of the National Environmental Management Act (Act No. 107 of 1998), as amended (NEMA). The proposed Project triggers the following Listed Activity:

- **Listing Notice 1 (Ln1):** Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017.
- **Listing Notice 2 (Ln2):** Scoping and EIA (S&EIA) of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017.
- **Listing Notice 3 (Ln3):** Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017.

"Based on the project understanding, the project triggers listed activities of Listing Notice 2 and is therefore subject to a full Scoping and Environmental Impact Assessment (S&EIA) Process."

This notification serves to announce the commencement of the Scoping and Environmental Impact Assessment process. The Draft Scoping Report will be compiled and is released to the public for a 30-day comment period from 8 January - 8 February 2024. The Draft Scoping Report will be compiled in accordance with the regulatory requirements stipulated in the EIA Regulations, 2017 (GN R 326 of April 2017) promulgated in terms of Section 24(5) of NEMA.

Stakeholders are invited to register as an Interested and Affected Parties (I&APs) and to participate in the S&EIA processes by identifying issues of concern and providing comments on the project. Registered I&APs will be kept informed about the Project.

To register as an I&AP and to obtain more information, please contact Khosi Ngema at ERM:  
Email: [Khosi.Ngema@erm.com](mailto:Khosi.Ngema@erm.com)  
Website: [erm.com](http://erm.com)

ERM Verwysings Nommer: 0695823

Omgewings Impak Bepaling vir die Voorgestelde Stigting van die Khoe Wind Energie Fasiliteit en Geassosieerde Infrastruktuur, Weskaap Provinsie

### UITNODIGING OM TE REGISTREER EN KOMMENTAAR TE LEWER

Environmental Resources Management Southern Africa Edms Bpk (ERM) was aangestel deur Energy Team Edms Bpk (Hierna 'ET') om die Omgewings Impak Bepaling (EIA) vir die voorgestelde stigting van die Hugo Wind Energie Fasiliteit (WEF) en geassosieerde infrastruktuur in die Weskaap Provinsie uit te voer. Die Projek vereis 'n Omgewings Magtiging (EA) van die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingevolge die Wet (Wet Nr. 107 van 1998) op Nasionale Omgewingsbestuur, soos gewysig (NEMA). Die voorgestelde Projek aktiveer die volgende Kennisgewing Aktiwiteit:

- **Noterings Kennisgewing 1 (Ln1):** Basiese Assessering (BA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.
- **Noterings Kennisgewing 2 (Ln2):** Omvangbepaling en EIA (S&EIA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.
- **Noterings Kennisgewing 3 (Ln3):** Basiese Assessering (BA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.

"Gebaseer op begrip van die projek, aktiveer die projek die gelyste aktiwiteite van Noterings Kennisgewing 2 en is dus onderwerp aan 'n volledige Omvangbepaling en Omgewings Impak Bepaling (S&EIA) proses."

Die doel van hierdie kennisgewing is om die aanvang van die Omvangbepaling en Omgewings Impak Bepaling proses aan te kondig. Die Konsep Omvangbepaling Verslag sal saamgestel word en aan die publiek vrygestel word vir 'n 30-dae kommentaar tydperk vanaf 8 Januarie - 8 Februarie. Die Konsep Omvangbepaling Verslag sal saamgestel word in ooreenstemming met die regulerende vereistes soos bepaal in die EIA Regulasies, 2017 (GN R 326 van April 2017) gepromulgeer ingevolge Artikel 24(5) van NEMA.

Belanghebbendes word genooi om te registreer as Belangstellendes en Geaffecteerde Partye (I&APs) en deel te neem in die S&EIA proses deur kwessies van kommer te identifiseer en kommentaar oor die projek te lewer. Geregistreeerde I&APs sal op hoogte gehou word van die Projek.

Om te registreer as 'n I&AP en meer inligting te bekom, kontak asseblief vir Khosi Ngema by ERM:  
E-pos: [Khosi.Ngema@erm.com](mailto:Khosi.Ngema@erm.com)  
Webwerf: [erm.com](http://erm.com)



## Hugo Wind Energy Facility and Associated Infrastructure

ERM Reference Number: 0695823

Environmental Impact Assessment for the Proposed Establishment of the Hugo Wind Energy Facility and Associated Infrastructure, Western Cape Province

### INVITATION TO REGISTER AND COMMENT

Environmental Resources Management Southern Africa Pty Ltd (ERM) was appointed by Energy Team Pty Ltd (hereafter 'ET') to conduct an Environmental Impact Assessment (EIA) for the proposed establishment of the Hugo wind energy facility (WEF) and associated infrastructure in the Western Cape Province. This Project requires an Environmental Authorisation (EA) from the Department of Forestry, Fisheries and Environment (DFFE) in terms of the National Environmental Management Act (Act No. 107 of 1998), as amended (NEMA). The proposed Project triggers the following Listed Activity:

- **Listing Notice 1 (Ln1):** Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017.
- **Listing Notice 2 (Ln2):** Scoping and EIA (S&EIA) of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017.
- **Listing Notice 3 (Ln3):** Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017.

"Based on the project understanding, the project triggers listed activities of Listing Notice 2 and is therefore subject to a full Scoping and Environmental Impact Assessment (S&EIA) Process."

This notification serves to announce the commencement of the Scoping and Environmental Impact Assessment process. The Draft Scoping Report will be compiled and is released to the public for a 30-day comment period from 8 January - 8 February 2024. The Draft Scoping Report will be compiled in accordance with the regulatory requirements stipulated in the EIA Regulations, 2017 (GN R 326 of April 2017) promulgated in terms of Section 24(5) of NEMA.

Stakeholders are invited to register as an Interested and Affected Parties (I&APs) and to participate in the S&EIA processes by identifying issues of concern and providing comments on the project. Registered I&APs will be kept informed about the Project.

To register as an I&AP and to obtain more information, please contact Khosi Ngema at ERM:  
Email: [Khosi.Ngema@erm.com](mailto:Khosi.Ngema@erm.com)  
Website: [erm.com](http://erm.com)

ERM Verwysings Nommer: 0695823

Omgewings Impak Bepaling vir die Voorgestelde Stigting van die Hugo Wind Energie Fasiliteit en Geassosieerde Infrastruktuur, Weskaap Provinsie

### UITNODIGING OM TE REGISTREER EN KOMMENTAAR TE LEWER

Environmental Resources Management Southern Africa Edms Bpk (ERM) was aangestel deur Energy Team Edms Bpk (Hierna 'ET') om die Omgewings Impak Bepaling (EIA) vir die voorgestelde stigting van die Hugo Wind Energie Fasiliteit (WEF) en geassosieerde infrastruktuur in die Weskaap Provinsie uit te voer. Die Projek vereis 'n Omgewings Magtiging (EA) van die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingevolge die Wet (Wet Nr. 107 van 1998) op Nasionale Omgewingsbestuur, soos gewysig (NEMA). Die voorgestelde Projek aktiveer die volgende Kennisgewing Aktiwiteit:

- **Noterings Kennisgewing 1 (Ln1):** Basiese Assessering (BA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.
- **Noterings Kennisgewing 2 (Ln2):** Omvangbepaling en EIA (S&EIA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.
- **Noterings Kennisgewing 3 (Ln3):** Basiese Assessering (BA) van die EIA Regulasies, gepromulgeer onder Staatskennisgewing R983 van 4 Desember 2014, soos gewysig deur Staatskennisgewing R327 van 7 April 2017.

"Gebaseer op begrip van die projek, aktiveer die projek die gelyste aktiwiteite van Noterings Kennisgewing 2 en is dus onderwerp aan 'n volledige Omvangbepaling en Omgewings Impak Bepaling (S&EIA) proses."

Die doel van hierdie kennisgewing is om die aanvang van die Omvangbepaling en Omgewings Impak Bepaling proses aan te kondig. Die Konsep Omvangbepaling Verslag sal saamgestel word en aan die publiek vrygestel word vir 'n 30-dae kommentaar tydperk vanaf 8 Januarie - 8 Februarie. Die Konsep Omvangbepaling Verslag sal saamgestel word in ooreenstemming met die regulerende vereistes soos bepaal in die EIA Regulasies, 2017 (GN R 326 van April 2017) gepromulgeer ingevolge Artikel 24(5) van NEMA.

Belanghebbendes word genooi om te registreer as Belangstellendes en Geaffecteerde Partye (I&APs) en deel te neem in die S&EIA proses deur kwessies van kommer te identifiseer en kommentaar oor die projek te lewer. Geregistreeerde I&APs sal op hoogte gehou word van die Projek.

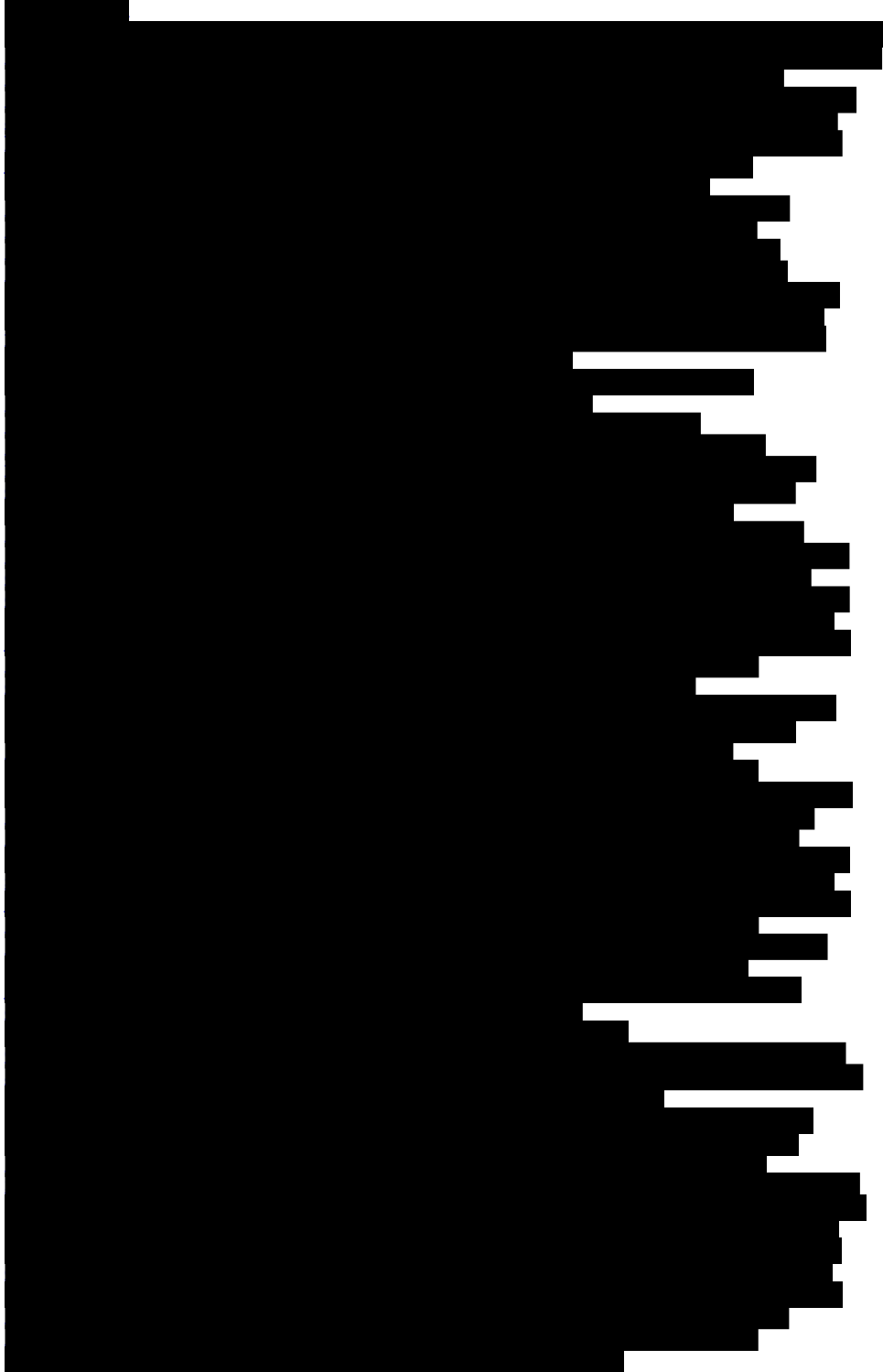
Om te registreer as 'n I&AP en meer inligting te bekom, kontak asseblief vir Aneesh Alwie by ERM:  
E-pos: [Khosi.Ngema@erm.com](mailto:Khosi.Ngema@erm.com)  
Webwerf: [erm.com](http://erm.com)





APPENDIX D NOTIFICATION SCOPING PHASE

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:**  
**Bcc:**



**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Monday, 01 July 2024 14:02:19  
**Attachments:** [image001.png](#)

---

Dear Registered Interested and Affected Party

**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

-  
DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Hugo and Khoe WEF , in the Western Cape Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from Thursday, 29 February 2024 until Tuesday, 02 April 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards



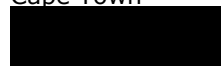
**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

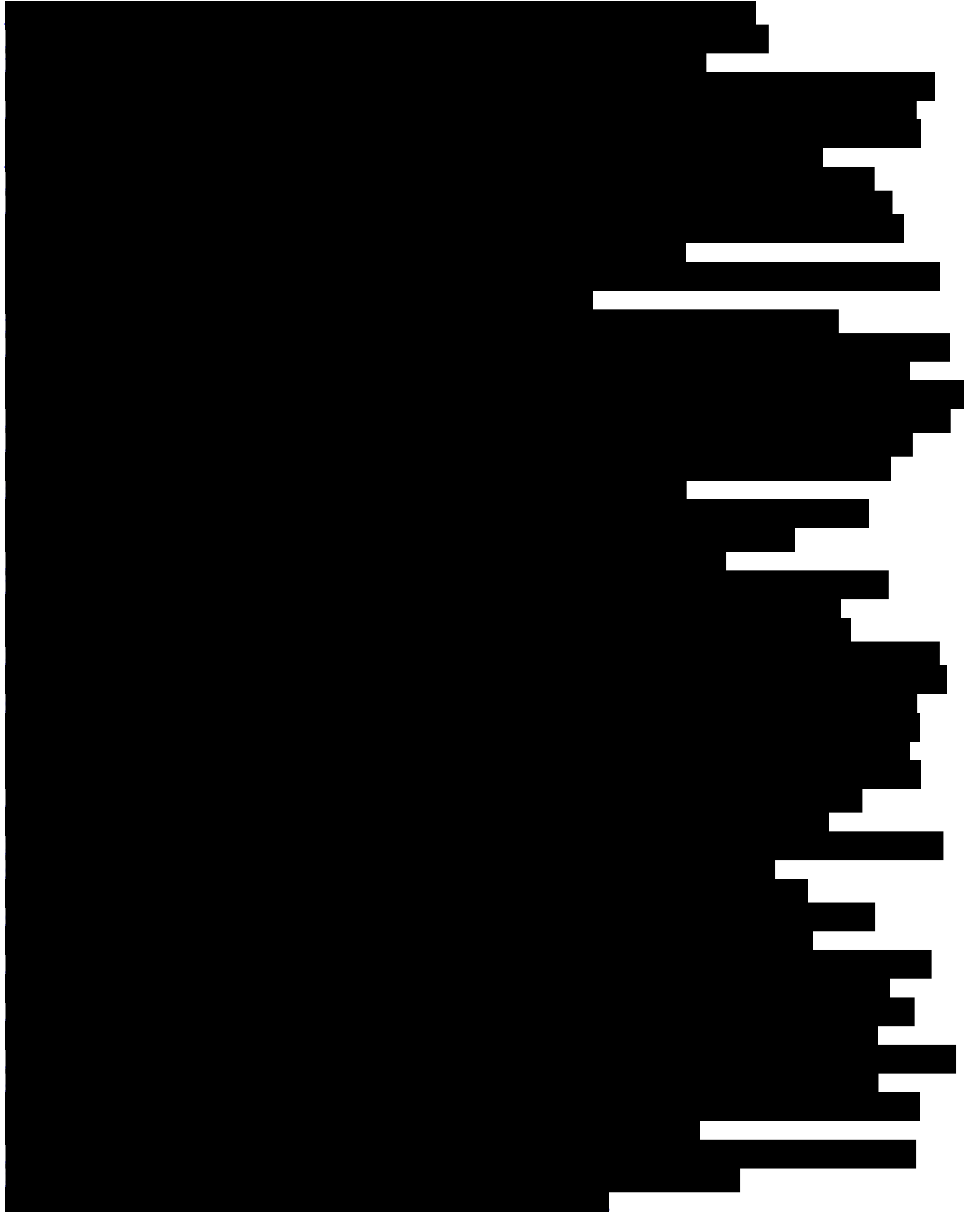
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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town





**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Bcc:**



**Subject:** Resubmission of the Draft Scoping Report for Public Comment: Scoping and Environmental Impact Assessment Process for the Proposed Establishment of the Khoe Wind Energy Facility and Associated Infrastructure, Western Cape Province  
**Date:** Thursday, 29 February 2024 14:55:27  
**Attachments:** [image001.png](#)  
[Khoe\\_Notification Letter Afrikaans.pdf](#)  
[Khoe\\_Notification Letter English.pdf](#)

---

Dear Stakeholder,

This email serves to inform you about the resubmission of the Environmental Application and the Draft Scoping Report for the proposed Khoe Wind Energy Facility and associated infrastructure near De Doorns in the Western Cape Province.

All comments received during the previous public participation period noted above will still be considered valid, and will form part of the updated Comments and Responses Report.

Stakeholders are re-invited to provide comments on the Draft Scoping Report by responding to this email between 29 February and 02 April 2024.

More information on how you are able to participate in this process is attached in the above

documentation.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

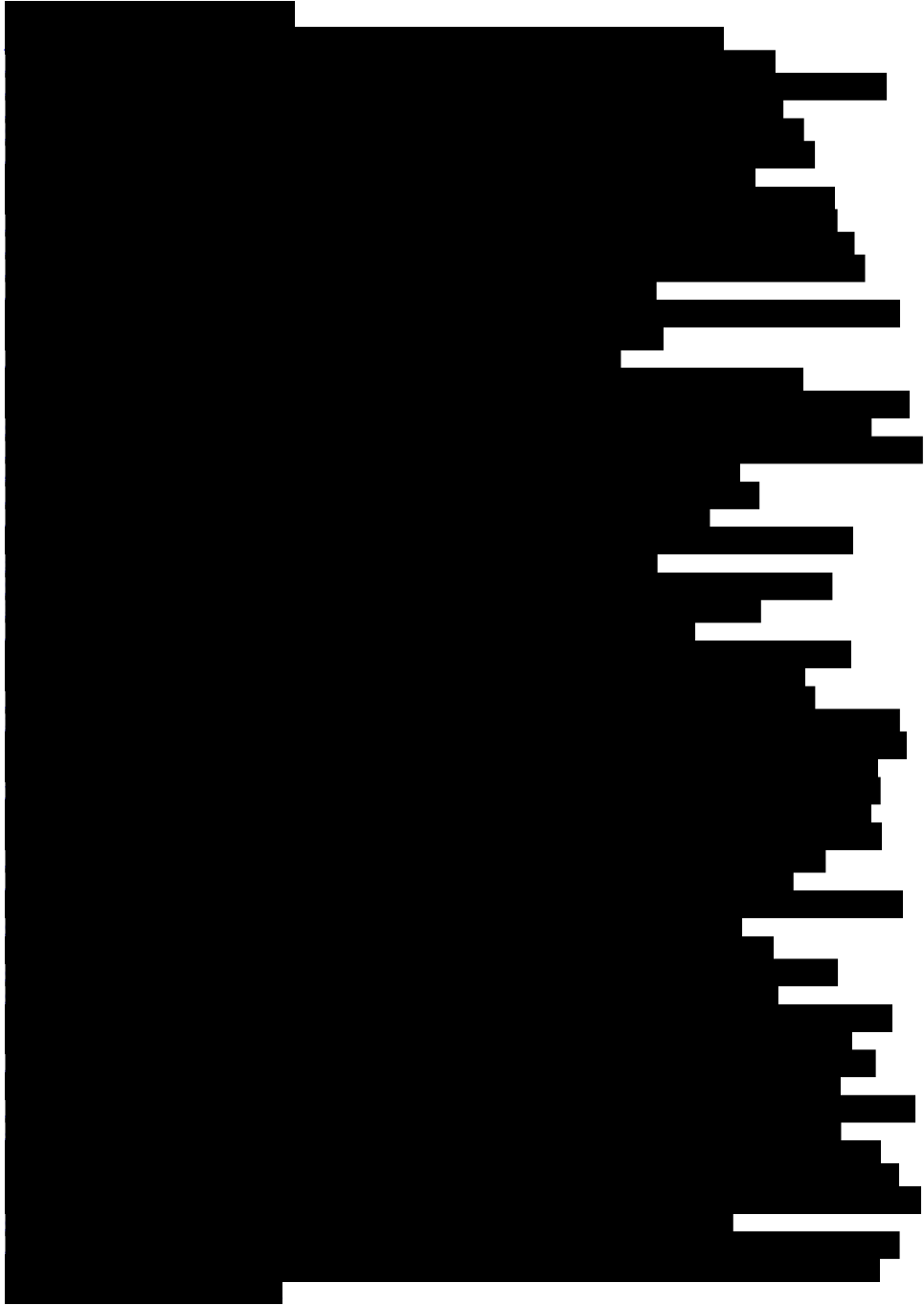
---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
+27 21 681 5400  
[REDACTED]



APPENDIX E NOTIFICATION OF DRAFT EIA REPORT

**From:** [Sadiya Salie](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:**  
**Bcc:**



**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 23 August 2024 15:32:00  
**Attachments:** [image001.png](#)  
[IAP Verwysings brief Afrikaans.pdf](#)  
[IAP Notification Letter English.pdf](#)

---

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA,



1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

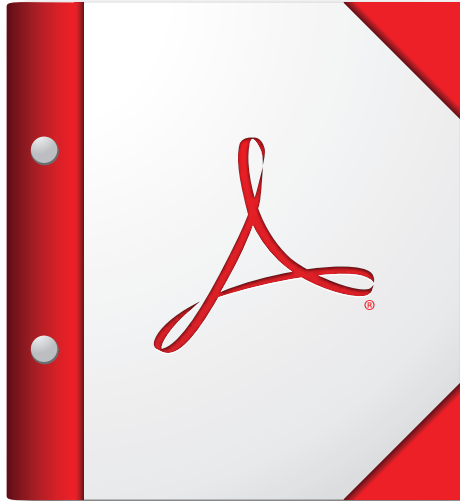
ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town





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APPENDIX F

CORRESPONDENCE-ORIGINAL  
COMMENTS & RESPONSES

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, 17 April 2024 19:00  
**To:** ERM Hugo & Khoe Wind Energy Facilities  
**Cc:** [REDACTED]  
**Subject:** Khoe Wind energy  
**Attachments:** Khoe BID-English.pdf

You don't often get email from robin@ethitech.co.za. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear [REDACTED]

Please see attached registration and comment sheet

Kind regards,

[REDACTED]  
Managing Director  
Ethitech Health Innovation

[REDACTED]  
(t) 021 855 0307 (switchboard)  
(a) 105 Wentworth, Somerset Links Office Park, De Beers Ave, Somerset West.  
(w) www.ethitech.co.za

This email is private and confidential. Any unauthorized use or interception of this email, or the review, retransmission, dissemination or other use of, or taking of any action in reliance upon the contents of this email, by persons or entities other than the intended recipient, is prohibited.

If you are not the named addressee please notify us immediately by replying to the email or by telephone

(South Africa +27 21 855 0307)), and delete this email and any copies thereof.

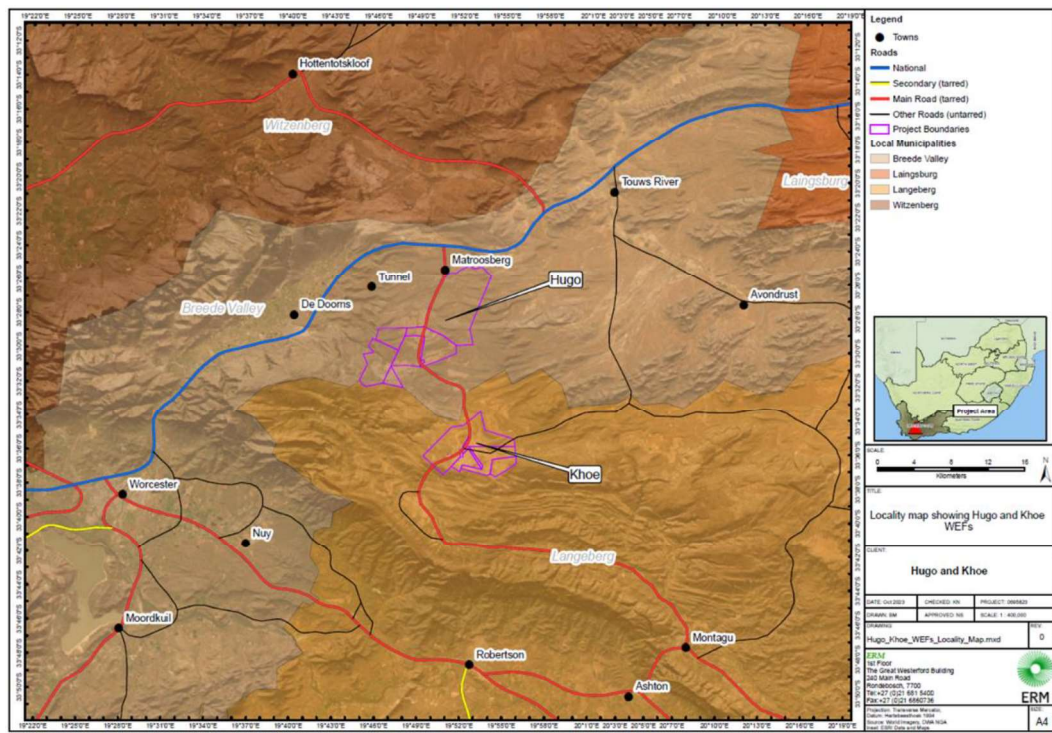
## ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE KHOE WIND ENERGY FACILITY AND ANCILLARY INFRASTRUCTURE, NEAR DE DOORNS, WESTERN CAPE.

### BACKGROUND INFORMATION DOCUMENT



## 1. PROJECT BACKGROUND

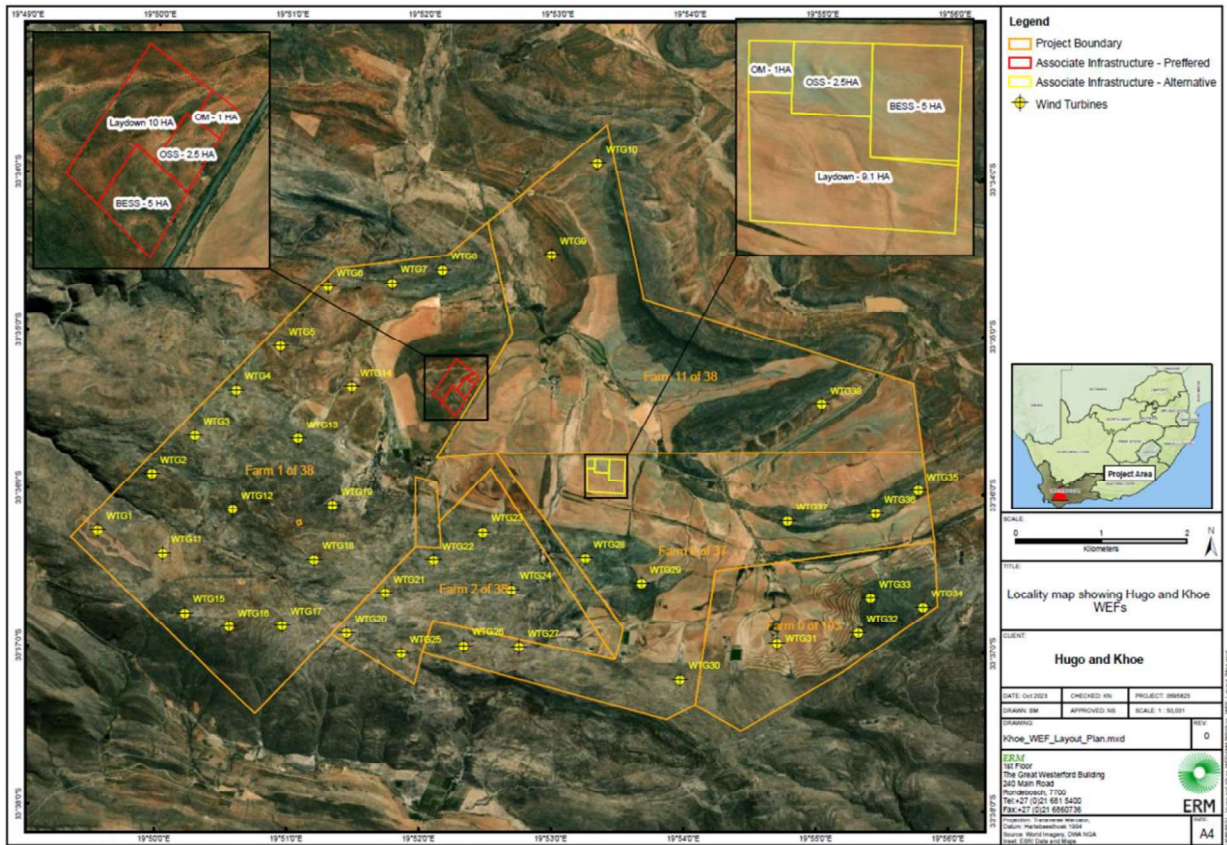
Environmental Resources Management Southern Africa Pty Ltd (ERM) was appointed by FE Hugo & Khoe Pty Ltd to conduct an Environmental Impact Assessment (EIA) for the proposed establishment of the Khoe wind energy facility (WEF) and associated infrastructure in the Western Cape Province. The Khoe WEF project site falls within the Langeberg Local municipality and is located ~20km south of De Doorns town as shown by figure 1 below.



**Figure 1: Locality map of the Hugo and Khoe Project Sites.**

## 2. PROJECT DESCRIPTION

The proposed Khoe WEF will consist of 38 turbines with a maximum output capacity of up to 290 MW. This operation will also comprise access roads and internal roads, a Battery Energy Storage System (BESS), an Operations and Maintenance (O&M) building and a temporary site office. A 33kV underground/overhead cabling along the proposed roads and 132 kV Overhead line connecting to the IPP substation will also be installed to connect the WEF to the national electrical grid network. With this said, it must be noted that the grid connection will form part of a separate application process.



**Figure 2: A schematic layout of the proposed Khoe wind energy facility.**

## 3. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

Environmental studies will be undertaken to identify positive and negative potential environmental and social impacts for the construction and operation phases of the Project. Appropriate mitigation and compensation measures will then be proposed.

The main impacts to be identified will focus on environmental aspects (e.g., landscape change, vegetation removal, habitat loss, noise increase, traffic control) and social aspects (e.g., socio-economic development, increased electricity generation, job creation, socioeconomic changes, and land use). At the scoping phase potential environmental and social impacts will be identified and based on this information, expert studies will be recommended for the ESIA phase.

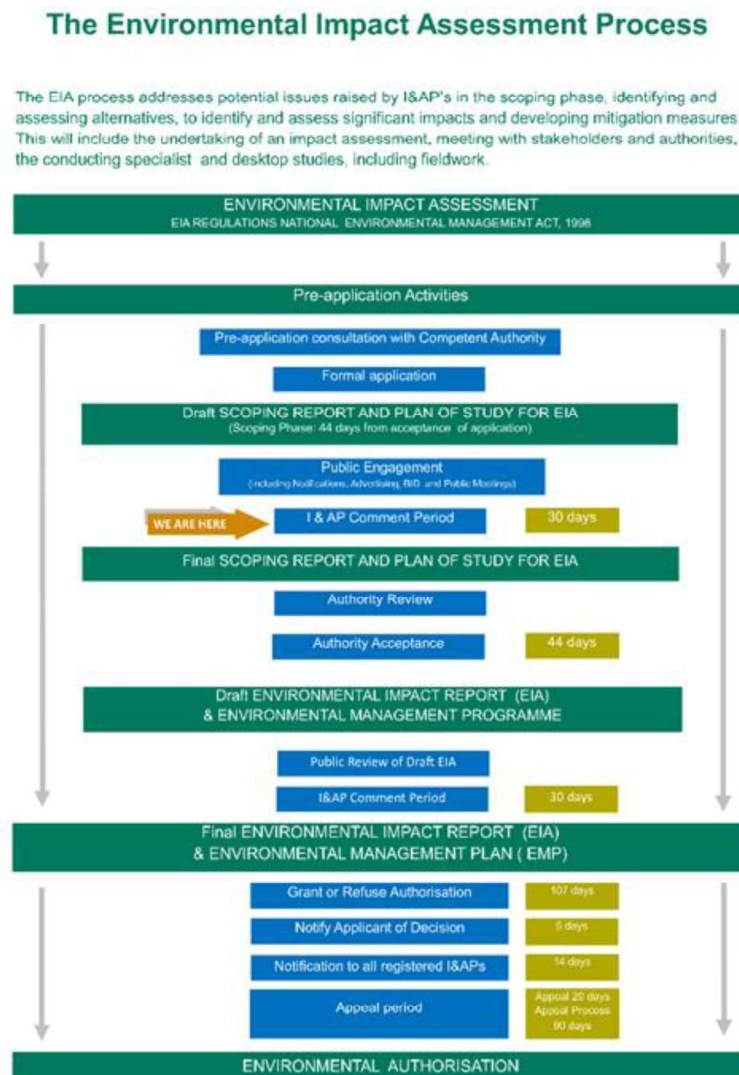


## 4. ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) PROCESS

The Environmental Impact Assessment Regulations (EIA Regulations), promulgated under Government Notice R982 of 4 December 2014, as amended by Government Notice R326 of 7 April 2017, provide for the control of certain listed activities. These activities are prohibited to commence until environmental authorisation has been obtained from the competent authority. These activities are contained in:

- Listing Notice 1 (LN1): Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017.
- Listing Notice 2 (LN2): Scoping and EIA (S&EIA) of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017.
- Listing Notice 3 (LN3): Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017.

Therefore, the project triggers listed activities of Listing Notice 2 and is therefore subject to a full Scoping and Environmental Impact Assessment (S&EIA) Process as follows:







**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Hugo and Khoe wind energy facility  
**Date:** Monday, 29 April 2024 15:15:32  
**Attachments:** [Khoe BID-English completed.pdf](#)

---

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**EXTERNAL MESSAGE**

Hi Schalk and Hugo

Please find attached our completed document relating to the Hugo and Khoe wind energy facility.

Please register me for an interested and affected party.

Kind regards

[REDACTED]

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Hugo Wind Energy Facility - Worcester  
**Date:** Monday, 06 May 2024 16:02:28  
**Attachments:** [SKM\\_C250i24050615280.pdf](#)  
[Official comments from DoA-Hugo WEF.pdf](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Hi [REDACTED]  
Please find attach comments from the WCDoA: LUM.

With many thanks and kind regards

[REDACTED]

Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
EISENBURG  
7607  
GPS koördinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road

[REDACTED]

Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)  
Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)



"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.  
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If you are not the intended recipient you may not copy or deliver this message to anyone."

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment  
**Date:** Wednesday, 17 April 2024 15:39:45

---

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**EXTERNAL MESSAGE**

Dear [REDACTED]

Please find attached our registration form for comment on the development of a Khoe Wind Energy Facility. We are not in favour of the development and will oppose it.

Regards

[REDACTED]  
Leeuwenboschfontein Astronomical Observatory

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Khoe Wind Energy Facility - Worcester  
**Date:** Monday, 06 May 2024 15:49:24  
**Attachments:** [SKM\\_C250j24050615310.pdf](#)  
[SKM\\_C250j24050615430.pdf](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Hi [REDACTED]  
Please find attach comments from the WCDoA: LUM.

With many thanks and kind regards

[REDACTED]

Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
ELSENBURG  
7607  
GPS koördinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road

[REDACTED]

Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)  
Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)



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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Khoe Wind energy  
**Date:** Wednesday, 17 April 2024 19:00:33  
**Attachments:** [Khoe BID-English.pdf](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear [REDACTED]

Please see attached registration and comment sheet

Kind regards,

[REDACTED]

Ethitech Health Innovation

[REDACTED]

(t) 021 855 0307 (switchboard)

(a) 105 Wentworth, Somerset Links Office Park, De Beers Ave, Somerset West.

(w) [www.ethitech.co.za](http://www.ethitech.co.za)

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(South Africa +27 21 855 0307)), and delete this email and any copies thereof.

**From:** [REDACTED]  
**To:** [Hester Kuhn; ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Hugo and Khoe wind energy facility  
**Date:** Tuesday, 20 August 2024 13:42:42  
**Attachments:** [image001.png](#)

---

Hi [REDACTED]

Thank you for your response.

Your comments have been taken into account. You will be notified once EIA become available.

Thank you,



**ERM**

Sustainability is our business

**Lucien Barbeau**  
Consultant

Cape Town  
[REDACTED]

[erm.com](http://erm.com)

---

**From:** [REDACTED]  
**Sent:** Monday, April 29, 2024 3:14 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
[REDACTED]  
**Subject:** Hugo and Khoe wind energy facility

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**EXTERNAL MESSAGE**

Hi [REDACTED]

Please find attached our completed document relating to the Hugo and Khoe wind energy facility.

Please register me for an interested and affected party.

Kind regards  
[REDACTED]

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: Hugo Wind Energy Facility - Worcester  
**Date:** Tuesday, 20 August 2024 13:27:12  
**Attachments:** [image002.png](#)

---

Good day

Thank you for your comment, these have been taken into consideration into the EMPr.

Kind Regards



---

**From:** [Redacted]  
**Sent:** Monday, May 6, 2024 4:02 PM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** Hugo Wind Energy Facility - Worcester

You don't often get email from [Redacted]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Hi [Redacted]  
Please find attach comments from the WCDoA: LUM.

With many thanks and kind regards

[Redacted]  
Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
ELSENBURG  
7607  
GPS koördinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road  
[Redacted]  
Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)  
Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)





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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment  
**Date:** Thursday, 30 May 2024 13:05:15  
**Attachments:** [image001.png](#)

---

Hi Marius,

Yes you will be notified once the Draft EIA becomes available for public participation.

Kind Regards



Sustainability is our business

**ERM**

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, May 14, 2024 7:15 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** Re: Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your reply. Can you please let me know when the draft EIA will become available for public participation?

Kind Regards  
[REDACTED]

On Thu, 18 Apr 2024 at 09:03, ERM Hugo & Khoe Wind Energy Facilities  
<[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)> wrote:

Hi Marius,

Thank you for your comment, however commenting period for the scoping phase ended 2<sup>nd</sup> April and will be notified once the draft EIA becomes available for public participation. Please note, the observatory will be included as a visual receptor and

impacts to be assessed during the EIA Phase.

Kind Regards



**ERM**

**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** [REDACTED]  
**Sent:** Wednesday, April 17, 2024 3:40 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[Hugokhoe@erm.com](mailto:Hugokhoe@erm.com)>  
**Subject:** Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment

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**EXTERNAL MESSAGE**

Dear [REDACTED]

Please find attached our registration form for comment on the development of a Khoe Wind Energy Facility. We are not in favour of the development and will oppose it.

Regards

[REDACTED]  
[REDACTED]

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment  
**Date:** Thursday, 18 April 2024 09:03:41  
**Attachments:** [image001.png](#)

---

Hi Marius,

Thank you for your comment, however commenting period for the scoping phase ended 2<sup>nd</sup> April and will be notified once the draft EIA becomes available for public participation. Please note, the observatory will be included as a visual receptor and impacts to be assessed during the EIA Phase.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, April 17, 2024 3:40 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <Hugokhoe@erm.com>  
**Subject:** Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment

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**EXTERNAL MESSAGE**

Dear Khosi Ngeam

Please find attached our registration form for comment on the development of a Khoe Wind Energy Facility. We are not in favour of the development and will oppose it.

Regards  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Re: Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment  
**Date:** Tuesday, 14 May 2024 07:14:37  
**Attachments:** [image001.png](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your reply. Can you please let me know when the draft EIA will become available for public participation?

Kind Regards  
Marius Reitz

On Thu, 18 Apr 2024 at 09:03, ERM Hugo & Khoe Wind Energy Facilities  
<[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)> wrote:

Hi Marius,

Thank you for your comment, however commenting period for the scoping phase ended 2<sup>nd</sup> April and will be notified once the draft EIA becomes available for public participation. Please note, the observatory will be included as a visual receptor and impacts to be assessed during the EIA Phase.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, April 17, 2024 3:40 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[Hugokhoe@erm.com](mailto:Hugokhoe@erm.com)>  
**Subject:** Khoe Wind Energy Facility - Leeuwenboschfontein Observatory Registration for Comment

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**EXTERNAL MESSAGE**

Dear Khosi Ngeam

Please find attached our registration form for comment on the development of a Khoe Wind Energy Facility. We are not in favour of the development and will oppose it.

Regards

[REDACTED]

[REDACTED]

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind Energy Facility - Worcester  
**Date:** Tuesday, 20 August 2024 13:26:56  
**Attachments:** [image002.png](#)

---

Good day

Thank you for your comment, these have been taken into consideration into the EMPr.

Kind Regards



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---

**From:** [REDACTED]  
**Sent:** Monday, May 6, 2024 3:48 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Khoe Wind Energy Facility - Worcester

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Hi Khosi Ngema  
Please find attach comments from the WCDoA: LUM.

With many thanks and kind regards



Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
ELSENBURG  
7607

GPS koordinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road



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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Re: Khoe Wind energy  
**Date:** Friday, 19 April 2024 09:31:46  
**Attachments:** [image002.png](#)  
[image003.png](#)

**EXTERNAL MESSAGE**

Dear Sadiya  
The coordinates I sent are from the surveyor so how would you like me to verify?

Kind regards,

Robin MacKinnon

Managing Director

[REDACTED]

t 0218550307(Switchboard)

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, April 19, 2024 9:22:11 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind energy

Hi Robin,

Thank you for providing the coordinates of the boundaries.

Turbine 20 is situated ~100m from the farm boundary of RE/38. This is to cover the blade length from the neighbouring farm and adherent to the land use scheme of the respective local municipality.

The affected farm – 2/38 – forms part of the facility, and an agreement is in place with the landowner. Similarly, all farm boundaries aka cadastre used to delineate the farms were sourced from the surveyors general office.

Can you please verify coordinates of position B.

Kind Regards



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, April 18, 2024 1:09 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Re: Khoe Wind energy

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya

Please see attached coordinates for my farm

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(t) 021 855 0307 (switchboard)  
(a) 105 Wentworth, Somerset Links Office Park, De Beers Ave, Somerset West.  
(w) [www.ethitech.co.za](http://www.ethitech.co.za)

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---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Thursday, April 18, 2024 9:02:17 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind energy

Hi Robin,

Thank you for your comment. Can you kindly indicate on the below map the portion of your farms so we are able to confirm whether it's within the Khoe WEF boundary or not.



Thank you,

Kind Regards



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Sadiya Salie  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
+27 21 681 5400  
+27 60 739 6993

---

**From:** [REDACTED]  
**Sent:** Wednesday, April 17, 2024 7:00 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Khoe Wind energy

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**EXTERNAL MESSAGE**

Dear Khosi Ngema

Please see attached registration and comment sheet

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

(t) 021 855 0307 (switchboard)

(a) 105 Wentworth, Somerset Links Office Park, De Beers Ave, Somerset West.

(w) [www.ethitech.co.za](http://www.ethitech.co.za)

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind energy  
**Date:** Friday, 19 April 2024 09:22:21  
**Attachments:** [image002.png](#)  
[image003.png](#)

Hi Robin,

Thank you for providing the coordinates of the boundaries.

Turbine 20 is situated ~100m from the farm boundary of RE/38. This is to cover the blade length from the neighbouring farm and adherent to the land use scheme of the respective local municipality.

The affected farm – 2/38 – forms part of the facility, and an agreement is in place with the landowner. Similarly, all farm boundaries aka cadastre used to delineate the farms were sourced from the surveyors general office.

Can you please verify coordinates of position B.

Kind Regards



**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, April 18, 2024 1:09 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Re: Khoe Wind energy

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya

Please see attached coordinates for my farm

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
(t) 021 855 0307 (switchboard)  
(a) 105 Wentworth, Somerset Links Office Park, De Beers Ave, Somerset West.  
(w) [www.ethitech.co.za](http://www.ethitech.co.za)

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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Thursday, April 18, 2024 9:02:17 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Khoe Wind energy

Hi Robin,

Thank you for your comment. Can you kindly indicate on the below map the portion of your farms so we are able to confirm whether it's within the Khoe WEF boundary or not.





Thank you,

Kind Regards



**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

**From:** [Redacted]  
**Sent:** Wednesday, April 17, 2024 7:00 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [Redacted]  
**Subject:** Khoe Wind energy

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**EXTERNAL MESSAGE**

Dear Khosi Ngema

Please see attached registration and comment sheet

Kind regards,

[Redacted]  
[Redacted]  
[Redacted]

(t) 021 855 0307 (switchboard)  
(a) 105 Wentworth, Somerset Links Office Park, De Beers Ave, Somerset West.  
(w) [www.ethitech.co.za](http://www.ethitech.co.za)

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Friday, 02 August 2024 10:45:50  
**Attachments:** [image004.png](#)

---

Good day, Kindly note the hard copies of the Scoping reports were sent previously.

Thank you



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, July 2, 2024 8:42 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

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**EXTERNAL MESSAGE**

Hi Mr. Khoe

Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General.

The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that.

As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy.

The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network.

CD or USB we can still put on a physical file.

With many thanks and kind regards

[REDACTED]  
Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
ELSENBURG  
7607

GPS koördinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road  
[REDACTED]

Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)  
Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)



**Western Cape  
Government**  
**FOR YOU**

---

**From:** [REDACTED]  
**Sent:** 01 July 2024 02:39 PM  
**To:** [REDACTED]  
**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Groete/Kind regards

**Cor van der Walt** (*Pr.Sci.Nat; SACNASP reg no. 400120/13*)  
Manager: Sub-Programme: Land Use Management  
Programme: Sustainable Resource and Use Management  
Western Cape Department of Agriculture  
Private Bag X 1  
ELSENBURG  
7607  
Ground Floor, Main Building, Muldersvlei Road Elsenburg

GPS Co-ordinates Elsenburg Head Office: 33.845259 S 18.834722 E

[REDACTED]  
Departmental Website: <https://www.elsenburg.com>  
Provincial Website: <https://www.westerncape.gov.za>

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, July 1, 2024 2:02 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

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Dear Registered Interested and Affected Party

**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

-

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Hugo and Khoe WEF , in the Western Cape Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from Thursday, 29 February 2024 until Tuesday, 02 April 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.



Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.

If you are not the intended recipient you may not copy or deliver this message to anyone."

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Friday, 12 July 2024 11:34:46  
**Attachments:** [06 Comments and Responses Report.pdf](#)  
[image001.png](#)  
[07 Comments and Responses Report.pdf](#)

---

Hi Rhett,

As per Legislation, it is not a requirement to upload the Final Scoping for review, only notification of FSR submission to DFFE is required.

I have attached the CRR for your perusal.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, July 12, 2024 8:35 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

I did not note any public participation documents or comments and response report on the website as part of the Final Scoping Report for submission. We are interested to know how our comments are being addressed.

Regards

Rhett

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, July 1, 2024 2:02 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**CAUTION:** This is an external email and may be malicious. Please take care when clicking links or opening attachments. If in any doubt, Report the Message.

Dear Registered Interested and Affected Party

**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

-

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Hugo and Khoe WEF, in the Western Cape Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from Thursday, 29 February 2024 until Tuesday, 02 April 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards

**Sadiya Salie**  
Consultant



# ERM

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Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town



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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Friday, 12 July 2024 11:38:23  
**Attachments:** [image001.png](#)

**EXTERNAL MESSAGE**

Hi Sadiya

Yes you are correct – we are aware that the final versions of reports do not need to be released for public participation. Thank you for providing us with the comments and response reports.

Regards

Rhett

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, July 12, 2024 11:33 AM  
**To:** Rhett Smart <rsmart@capenature.co.za>; ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

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Hi Rhett,

As per Legislation, it is not a requirement to upload the Final Scoping for review, only notification of FSR submission to DFFE is required.

I have attached the CRR for your perusal.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, July 12, 2024 8:35 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

I did not note any public participation documents or comments and response report on the website as part of the Final Scoping Report for submission. We are interested to know how our comments are being addressed.

Regards

Rhett

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Monday, July 1, 2024 2:02 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**CAUTION:** This is an external email and may be malicious. Please take care when clicking links or opening attachments. If in any doubt, Report the Message.

Dear Registered Interested and Affected Party

**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

-  
DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

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With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Friday, 12 July 2024 08:34:57  
**Attachments:** [image001.png](#)

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**EXTERNAL MESSAGE**

Dear Sadiya

I did not note any public participation documents or comments and response report on the website as part of the Final Scoping Report for submission. We are interested to know how our comments are being addressed.

Regards

Rhett

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Monday, July 1, 2024 2:02 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

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Dear Registered Interested and Affected Party

**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

-  
DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

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**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Wednesday, 14 August 2024 08:49:32  
**Attachments:** [image001.png](#)

---

Hi Heinn,

Your response has been included in the comments and response report.

You will be notified once the Draft EIA becomes available for Public review.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, August 7, 2024 1:22 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**EXTERNAL MESSAGE**

Good day Sadiya

Can you please confirm that my objection against the project has been noted and added to the report.

Regards

**Heinn Havinga**

Wealth Manager

[REDACTED]  
[PSG Wealth | Ground floor | Triangle House | Mall Ring Road | Somerset Mall | Somerset West 7130](#)  
[www.psg.co.za/branch-office/somerset-west-mall-ring-road-financial-planning](#)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Monday, July 1, 2024 2:02 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Dear Registered Interested and Affected Party

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-

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**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards

**Sadiya Salie**  
Consultant



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---

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Wednesday, 14 August 2024 08:49:32  
**Attachments:** [image001.png](#)

---

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Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, August 7, 2024 1:22 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**EXTERNAL MESSAGE**

Good day Sadiya

Can you please confirm that my objection against the project has been noted and added to the report.

Regards

**Heinn Havinga**

Wealth Manager

[REDACTED]  
[PSG Wealth | Ground floor | Triangle House | Mall Ring Road | Somerset Mall | Somerset West 7130](#)  
[www.psg.co.za/branch-office/somerset-west-mall-ring-road-financial-planning](#)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Monday, July 1, 2024 2:02 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Dear Registered Interested and Affected Party

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-

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

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**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards

**Sadiya Salie**  
Consultant



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---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Registration + Comment / Drie Kuilen Nature Reserve  
**Date:** Wednesday, 14 August 2024 09:06:15  
**Attachments:** [image001.png](#)  
[Site Notice Report Proof.pdf](#)

---

Good day Lina,

Thank you for your response.

Kindly note that site notices were placed along site boundary as well as within the area – kindly see attached report.

Regarding the Verreaux eagle nest, this is currently inactive, and an appropriate buffer has been implemented to avoid encroachment.

We appreciate your response, and you will be notified once the Draft EIA becomes available.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 26, 2024 9:53 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** Registration + Comment / Drie Kuilen Nature Reserve

Sie erhalten nicht oft eine E-Mail [REDACTED]. [Erfahren Sie, warum dies wichtig ist](#)

**EXTERNAL MESSAGE**

Good day,

please find attached our signed registration and comment sheet.

On this note, I find it quite disturbing that we, Drie Kuilen Nature Reserve, are mentioned several times in various reports and assessments about the planned wind farm but have never been



contacted. Instead we had to do our own research just to figure out what exactly is planned in our area. Only one person ever visited our site to do a “visual assessment”, that is how we heard about the project.

I will appreciate more transparency and communication in future.

Since Drie Kuilen has never been part of investigations I have strong doubts about the truthfulness of some report. Mainly the avian report that states no breeding Verreaux eagles, no nesting owls, no resident black harriers.

This is imply wrong, we have all of them and our breeding pair of Verreaux eagle with a juvenile in March is a huge problem for the proposed farm as these are moving within the 5.4km radius – even breeding in that area. We also have three different owls on the property, a breeding pair as well, various bats and a very long bird list. This is crucial to any decision but unfortunately the avian report did not include our property or shares the same knowledge.

We are a protected area with 4.300ha untouched nature and protected game. We finance our conservation due to tourism and accommodation. The building phase of the wind farm will heavily affect our business due to road damage, blockages, etc. and once the turbines are up we are concerned about the visual effects of the historic and remote Klein Karoo. The Nougaspoot corridor has been working hard in the past years with Montagu-Ashton and Touwsrivier tourism associations to become better known and push the tourism, organize bicycle tours and establish a route of remote places. After COVID hit it took us all a while to develop this strong tourism section in our mountain range and finally this year we're feeling the tourism number picking up. That stretches from Leeuwenbosch, Kopbeenskloof, Huizen, Gecko Rock, Rooikrans, Desert Wind... All of us rely on the access via R318 and the gravel corridor.

I am a family member of the owners and manage our reserve for my family. There are two managers on the ground, Stefan and Elena Short as well as our team.

I am looking forward to hear back from you soon.

Best regards,  
Lina Grube

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Registration and Comment sheet. H Havinga  
**Date:** Monday, 29 April 2024 09:50:33

---

**EXTERNAL MESSAGE**

Good day

From the N1 you drive on the R318 towards Montagu for about 15 km. You will find a Small White sign on your right hand side showing "Middelberg". Follow the dirt road for about 4 km until you reach the farm.

regards

**Heinn Havinga**

Wealth Manager

[REDACTED]  
[PSG Wealth | Ground floor | Triangle House | Mall Ring Road | Somerset Mall | Somerset West 7130](#)  
[www.psg.co.za/branch-office/somerset-west-mall-ring-road-financial-planning](http://www.psg.co.za/branch-office/somerset-west-mall-ring-road-financial-planning)



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---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Friday, April 26, 2024 11:00 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>; [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Registration and Comment sheet. H Havinga

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi Heinn,

Can you kindly confirm the location of your guesthouse? Our visual specialist is planning to visit the site 5<sup>th</sup> May and will include your guesthouse as a receptor to assess for visual impact.

Thank you,

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, April 3, 2024 4:43 PM

**To:** [REDACTED]

**Cc:** Stephen Burton <[Stephen.Burton@erm.com](mailto:Stephen.Burton@erm.com)>

**Subject:** RE: Registration and Comment sheet. H Havinga

Hi Heinn,

We acknowledge there may be a high visual impact on your property and potential impact will be investigated further by the visual specialist, during the EIA phase.

Thank you,

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, April 2, 2024 9:47 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Registration and Comment sheet. H Havinga

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

Please find attached my registration information. Kindly acknowledge receipt thereof.

regards

**Heinn Havinga**

Wealth Manager

[REDACTED]  
PSG Wealth | Ground floor | Triangle House | Mall Ring Road | Somerset Mall | Somerset West 7130  
[www.psg.co.za/branch-office/somerset-west-mall-ring-road-financial-planning](http://www.psg.co.za/branch-office/somerset-west-mall-ring-road-financial-planning)



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---

**From:** [REDACTED]  
**Sent:** Tuesday, April 2, 2024 9:28 AM  
**To:** [REDACTED]  
**Subject:** Message from KM\_C3350i

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE

23 Augustus 2024

### KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

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## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 23 August 2024 15:33:15

---

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Goeie dag. Ek is tans met verlof en sal weer Vrydag 30 Augustus terug wees op kantoor.  
kontak asb die volgende persone by die tak: 023 3121094 of stuur 'n epos na:

[REDACTED]

Baie dankie

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

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Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities; Sadiya Salie](#)  
**Cc:** [REDACTED]  
**Subject:** Hugo WEF Draft EIA: SABAA response  
**Date:** Sunday, 25 August 2024 14:26:12

---

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-dejar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-dejar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

*Website: [www.sabaa.org.za](http://www.sabaa.org.za)*



# Volume I: Draft Environmental Impact Assessment Report

Proposed Khoe Wind Energy Facility  
and associated Infrastructure, Western  
Cape Province

**PREPARED FOR**

DFFE Reference:

14/12/16/3/3/2/2516

Draft for Public Comment

**DATE**

23 August 2024

**REFERENCE**

0695823



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The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.

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DOCUMENT SUBTITLE	Proposed Khoe Wind Energy Facility and associated Infrastructure, Western Cape Province
PROJECT NUMBER	0695823
Date	23 August 2024
Version	2.0
Author	Sadiya Salie, Stephanie Gopaul
Client name	FE Hugo & Khoe (Pty) Ltd

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VERSION	REVISION	AUTHOR	REVIEWED BY	ERM APPROVAL TO ISSUE		COMMENTS
				NAME	DATE	
1.0	00	Sadiya Salie, Stephanie Gopaul	Stephen Burton	Stephanie Gopaul	05-08-2024	Draft for Client Consideration
2.0	01	Sadiya Salie, Stephanie Gopaul	The Energy Team	Stephanie Gopaul	21-08-2024	Draft for Public Domain

SIGNATURE PAGE

# Volume I: Draft Environmental Impact Assessment Report

Proposed Khoe Wind Energy Facility and associated Infrastructure,  
Western Cape Province

0695823



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**Stephanie Gopaul**

Partner and Registered EAP

---

**Name Surname**

Job title

---

ERM Southern Africa (Pty) Ltd.

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## ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AQA	Air Quality Act
BESS	Battery Energy Storage System
BGWMA	Breede-Gouritz Water Management Area
CA	Competent Authority
CARA	Conservation of Agricultural Resources, 1983 (Act No. 43 of 1983)
CBA	Critical Biodiversity Area
CBD	Convention on Biological Diversity
CHSSP	Community Health, Safety and Security Plan
CR	Critically Endangered
CRM	Collision Risk Model
dB	Decibel
DD	Data Deficient
DFFE	Department of Forestry, Fisheries and the Environment (National)
DMRE	Department of Mineral Resources and Energy
DoE	Department of Energy

<b>Acronyms</b>	<b>Description</b>
DHSWS	Department of Human Settlement, Water and Sanitation
EN	Endangered
EAP	Environmental Assessment Practitioner
ECA	Environment Conservation Act, 1989 No. 73 of 1989)
EGI	Electricity Grid Infrastructure
EI	Ecological Importance
EIA	Environmental Impact Assessment
EIS	Ecological Importance and Sensitivity
EMPr	Environmental Management Programme
ENIA	Environmental Noise Impact Assessment
ESA	Ecological Support Area
ESA	Early Stone Age
ESMP	Environmental and Social Management Plan
EWT	Endangered Wildlife Trust
FSR	Final Scoping Report
GBIF	Global Biodiversity Information Facility
GHG	Greenhouse Gas
GNR	Government Notice Regulation
HIA	Heritage Impact Assessment
HSM	Habitat Suitability Model
I&AP	Interested and Affected Party
IDP	Integrated Development Plan
IEM	Integrated Environmental Management
IPP	Independent Power Producer
IRP	Integrated Resource Plan
kV	Kilovolt
kWh	Kilowatt Hours
LC	Least Concern
LM	Langeberg Municipality
LN	Listing Notice
LSA	Late Stone Age
MSA	Middle Stone Age
MW	Megawatt
NCCAS	National Climate Change Adaptation Strategy
NCR	Noise Control Regulations



<b>Acronyms</b>	<b>Description</b>
NDP	National Development Plan
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NFEPA	National Freshwater Ecosystem Priority Area
NID	Notice of Intent to Develop
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NPAES	National Protected Area Expansion Strategy
NSR	Noise Sensitive Receptor
NT	Near Threatened
NWA	National Water Act, 1998 (Act No. 36 of 1998)
O&M	Operation and Maintenance
PAOI	Project Area of Influence
PES	Present Ecological State
pW	pico Watt
PWL	Sound Power Level
PPP	Public Participation Process
QGIS	Quantum Geographic Information System
RD	Red Data
REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
REC	Recommended Ecological Category
REDz	Renewable Energy Development Zone
REEA	Renewable Energy EIA Application
REL	Red List of Ecosystems
S&EIA	Scoping and Environmental Impact Assessment
SABAP2	The Southern African Bird Atlas Project
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SANRAL	South African National Roads Agency Limited
SANS	South African National Standards
SCADA	Supervisory Control and Data Acquisition
SDF	Spatial Development Framework
SEA	Strategic Environmental Assessment
SEF	Solar Energy Facility
SDOD	Shut-down-on-demand
SIA	Social Impact Assessment

<b>Acronyms</b>	<b>Description</b>
SR	Scoping Report
SSC	Species of Conservation Concern
ToR	Terms of Reference
UNFCC	United Nations Framework Convention on Climate Change
VM	Virtual Museum
VP	Vantage Point
VU	Vulnerable
WCCCRS	Western Cape Climate Change Response Strategy
WDM	Winelands District Municipality
WULA	Water Use License Application

## PROJECT DETAILS

<b>DFFE Reference</b>	<b>14/12/16/3/3/2/2516</b>		
ERM Reference	0695823 Khoe Wind Energy Facility		
Project Title	Khoe Wind Energy Facility and associated Infrastructure		
EAP	Stephanie Gopaul	Environmental Resource Management Southern Africa (Pty) Ltd	
Consultant	Sadiya Salie	Environmental Resource Management Southern Africa (Pty) Ltd	
Specialist Team	Soil, Land Use and Agricultural Potential	Johann Lanz	Independent Consultant
	Heritage and Palaeontology	John Gribble	ACO Associates cc
	Noise	Mornè De Jager	Enviro Acoustic Research
	Visual/ Landscape	Lourens du Plessis	LOGIS
	Traffic	Victor de Abreu and Reabetswe Mokomele	SMEC
	Biodiversity	Dr Owen Davies	ERM
	Socio-Economic	Tony Barbour	Independent Consultant
	Avifauna	Dr Rob Simmons	Birds and Bats Unlimited
	Bats	Stephanie Dippenaar	Stephanie Dippenaar Consulting trading as EkoVler
	Freshwater and Wetlands (Aquatics)	Dr Brian Colloty	EnviroSci
Project Applicant	FE Hugo & Khoe (Pty) Ltd		
Report Status	EIA Report – Draft for public comment		

## PUBLIC PARTICIPATION DETAILS

The Draft Environmental Impact Assessment (EIA) Report, with the required application form, has been submitted to the Department of Forestry, Fisheries and the Environment (DFFE), acting as the Competent Authority (CA).

Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Report available for public review and comment from the 23 August 2024 until the 23 September 2024 (both days inclusive), at the following locations.

Location	Physical Address
Hard Copy Location	
De Doorns Public Library	7 Station Road, De Doorns, Western Cape, South Africa
Electronic copy locations	

Location	Physical Address
ERM Website	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
Electronic Transfer	Interested and Affected Parties (I&APs) may request for copies to be shared via a One Drive folder.
Hard copies available upon request	

## EXECUTIVE SUMMARY

FE Hugo and Khoe (Pty) Ltd is applying for an Environmental Authorisation to construct and operate the Khoe Wind Energy Facility (WEF) with a capacity of up to 232 MW. Additional ancillary infrastructure to the WEF would include underground and above-ground cabling between project components, onsite substation/s, Battery Energy Storage Systems (BESS), foundations to support turbine towers, internal/ access roads linking the wind turbines and other infrastructure on the site, and permanent workshop area and office for control, maintenance and storage. As far as possible, existing roads will be utilised and upgraded (where needed). The proposed development is located near the De Doorns town in the Western Cape Province. Hereafter, the proposed Khoe WEF as well as its associate infrastructure will be referred to as the "proposed development".

One additional WEF, namely Hugo is concurrently being considered in the surrounding properties and is assessed by way of separate impact assessment processes contained in the 2014 Environmental Impact Assessment (EIA) Regulations (GN No. R982, as amended) for listed activities contained in Listing Notices 1, 2 and 3 (GN R983, R984 and R985, as amended).

It is important to note that the grid connection will not form part of this S&EIA process. It will, however, be assessed in a separate application process at a later stage.

## SITE LOCATION AND PROPOSED DEVELOPMENT DESCRIPTION

The proposed Khoe WEF is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

The Khoe WEF project site is proposed to accommodate infrastructure (as detailed below), which will enable the WEF to supply a contracted capacity of up to 232 MW. The development footprint of the site will be up to 85 ha, dependent on the sensitivities in the area. The proposed development will comprise of the following infrastructure:

- Up to 29 wind turbines with a maximum tip height of up to 250 m and a rotor diameter of up to 200 m.
- Each turbine will have a capacity of up to 8 MW
- A transformer at the base of each turbine.
- Concrete turbine foundations approximately up to 1,000 m<sup>2</sup> per turbine
- Each turbine will have a hardstand area of approximately up to 7,500 m<sup>2</sup> per turbine
- Temporary laydown areas (with a footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area.
- Battery Energy Storage System (BESS) (with a footprint of up to approximately 5 ha).
- Cabling between the turbines, to be laid underground where practical.
- One on-site substations of up to 2.5 ha in extent to facilitate the connection between the WEF and the electricity grid.
- Access roads to the site and between project components inclusive of stormwater infrastructure. A 13.5 m road corridor may be temporarily impacted upon during construction and rehabilitated to 8m wide after construction.
- A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha).

- Operation and Maintenance (O&M) buildings (with a combined footprint of up to 1 ha) including a gate house, security building, control centre, offices, warehouses, a workshop and visitor's centre.

The project is expected to have a 20-25-year life span, but with possible refurbishment this could be extended if deemed feasible at the time.

### ENVIRONMENTAL LEGISLATIVE REQUIREMENTS

The EIA Regulations 2014 published in Government Notice (GN) No. R. 982 as amended provide for the control of certain Listed Activities. These activities are listed in GN No. R. 983 (Listing Notice 1 - Basic Assessment), R. 984 (Listing Notice 2 - Scoping & EIA Process) and R. 985 (Listing Notice 3 - Basic Assessment) of 4 December and are prohibited to proceed until environmental authorisation has been obtained from the competent authority, in this case, the Department of Environment, Forestry and Fisheries (DFFE).

On 7 April 2017 in Government Gazette 40772 the Minister of Environmental Affairs published amendments in Government Notice (GN) Number R. 326 to the Environmental Impact Assessment (EIA) Regulations of 2014 that provide for the control of certain Listed Activities. These activities are listed in Listing Notice 1 (GN R327), Listing Notice 2 (GN R325) and Listing Notice 3 (GN R324). Activities triggered within Listing Notice 1 and 3 require Basic Assessment; activities within Listing Notice 2 require a Scoping & EIA Process.

As the proposed Khoe WEF and associated infrastructure triggers Activities in Listing Notices 1 - 3 and does not fall within a Renewable Energy Development Zone (REDZ), a full Scoping and EIA (S&EIA) process has been followed.

Listed Activities applicable to the proposed Khoe WEF and associated infrastructure are presented in the table below. All potential impacts associated with these Listed Activities have been considered and assessed in this S&EIA process

**TABLE 0.1 APPLICABLE LISTED ACTIVITIES IN TERMS OF THE NEMA, AS AMENDED**

Listing Notice	Activities
LN 1 GN R327 <sup>1</sup>	11(i); 12 (ii, a, c); 14; 19 (i); 24 (ii); 28 (ii); and 56 (i)(ii).
LN 2 GN R325 <sup>2</sup>	1; and 15.
LN 3 GN R324 <sup>3</sup>	4 (i)(ii)(aa); and 18(i)(ii) (aa)

Depending on the final design of the Khoe WEF and associated infrastructure, there may be a requirement for the following additional permits / authorisations:

- Biodiversity Permits in terms of the National Environmental Management: Biodiversity Act (Act No 10 of 2004) (NEMBA);

<sup>1</sup> "Listing Notice 1 of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017."

<sup>2</sup> "Listing Notice 2 of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017."

<sup>3</sup> "Listing Notice 3 of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017."

- Waste Management License/s as required by the NEMA, Waste Act, 2008 (Act No. 59 of 2008);
- Water Use Licenses as required by the National Water Act, 1998 (Act No. 36 of 1998) (NWA);
- Obstacle approval- an obstacle assessment will be undertaken prior to construction; and
- Heritage License in term of the National Heritage Resources Act 25 of 1999.

These permits will be applied for should the project be authorised and be selected as a preferred bidder.

### ENVIRONMENTAL IMPACT ASSESSMENT PHASE

The Final Scoping Report (FSR) (ERM, April 2024) presented and assessed the initial proposed wind turbine layout and associated infrastructures of the Khoe WEF and its associated infrastructure. In May 2024, the DFFE accepted the FSR (14/12/16/3/3/2/2516). The results of the specialists' scoping assessments, DFFE comments on the FSR, and other technical and financial constraints for the proposed development site were taken into consideration and a revised 'preferred layout' was produced.

This EIA report presents and assesses the impacts associated with the preferred layout of the Khoe WEF.

### SUMMARY OF SPECIALIST ASSESSMENTS RESULTS

Each of the specialist assessments followed a systematic approach to the identification and assessment of impacts, with the principal steps being:

- Description of existing environment / baseline conditions;
- Prediction of likely potential impacts, including cumulative impacts (both positive and negative);
- Assessment of likely potential impacts (positive and negative);
- Identification of appropriate mitigation measures; and
- Assessment of residual (potential) environmental impacts.

The individual assessment methodologies and baseline descriptions are set out in this report. The approaches are in line with the legal requirements and industry best practice guidelines and makes use of the experience and expertise of the EAP and the specialists.

Studies have been completed to quantify possible impacts and magnitude of impacts related to but not limited to the soil, land, avifauna, visual/landscape, fauna, flora, aquatic, terrestrial biodiversity, heritage, noise, socio-economic and traffic and transportation and includes measures to mitigate and reduce the significance of impacts.

### SOIL, LAND USE AND AGRICULTURAL POTENTIAL

The site is in an area where there is limited crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore limiting to rain-fed cropping. The dominant soils are shallow soils on underlying weathered bedrock of the Glenrosa, Hutton, Swartland, and Mispah soil forms. There is a high proportion of rock outcrops. The soils are limited in their agricultural potential by shallow depths, rockiness, and low water holding capacity and are unsuitable for crop production as a result,

except in some lower-lying areas where accumulation leads to deeper soils, and limited cropping is practised.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In the case of wind farms, the amount of land excluded from agriculture is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has. Furthermore, wind farms have both positive and negative effects on the production potential of land, and it is the net sum of these positive and negative effects that determines the extent of the change in future production potential.

From an agricultural impact point of view, it **is recommended that the proposed development be approved.**

### FRESHWATER AND WETLANDS (AQUATICS)

The assessment report was undertaken to meet the criteria to fulfil a Specialist Verification Assessment Report as the proposed site is located within an area rated as very high sensitivity by the DFFE Screening Tool.

The site is situated within the North Langeberg Sandstone Fynbos, South Langeberg Sandstone Fynbos and Matjiesfontein Shale Renosterveld vegetation units, all forming part of the Die Brak river catchment. These vegetation units are not listed as a Threatened Ecosystem, by NEMA due to it being considered Endangered. A small southern portion of the site is located in the Koo River catchment however only one drainage feature associated with this catchment is located within the study area farm portions.

The area is characterised by low lying drainage areas with riverine and drainage line systems, valley bottom wetland areas, seepage wetlands associated with several of the larger dams and one small depression. Further the area has seen a high degree of transformation in the form of cultivation areas, grazing, as well as the creation of several farm dams, roads and tracks. Of significance is the fact that most of the watercourses have either been converted into herring bone drain features or bermed to increase flows into downstream dams. This has then led to riverbed incision and the formation of the alluvial fans observed, i.e. sedimentation of low-lying downstream areas due to this and loss of vegetative cover.

Coupled to the aquatic delineations, information was collected on potential species that could occur within the watercourses, especially any conservation worthy species (Listed or Protected) but noting these were mostly terrestrial in nature and associated with the high level of disturbance.

Using the baseline description, aquatic features were identified, then categorised into one of number pre-determined sensitivity categories to provide protection and/or guide the layout planning processes. The sensitivity ratings of High (No-Go) to Low were determined through an assessment of the habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems) and this is considered acceptable since these areas are already disturbed.

In summary, the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. The loss of irreplaceable aquatic habitat and/or important biota is highly unlikely, i.e. Very High sensitivity or No-Go areas. This also includes the spanning of a



functioning drainage line, which would not be seen as problematic, if suitable stormwater management and drainage from the area of the site is provided. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

None of the proposed project alternatives (buildings) have a direct impact on the aquatic environment, making use of the existing provincial / district road network thus either option is deemed acceptable.

The significant impacts are associated with the access road crossings river systems. These systems are generally in a modified state (existing road), but still provide some habitat and important ecological functions.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.

## TERRESTRIAL BIODIVERSITY

The site is predominantly classified as Low Sensitivity by the Department of Forestry, Fisheries and the Environments (DFFE) Online Screening Tool (ST), while remaining areas are classified as Very High Sensitivity. This is due to the intersection of the PAOI with various important biodiversity areas including Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and Freshwater Ecosystem Priority Areas (FEPA) associated with the Langeberg-Wes Mountain Catchment.

Up to 586 animal species are potentially present on site, of which 40 are Species of Conservation Concern (SCC). However, some of the occurrence data is likely collected from individuals reintroduced to game reserves. Up to 1,782 plant species are potentially present on site, of which 48 are confirmed SCC according to the DFFE Online ST. Given the high number of plant species potentially present it is likely the number of plant SCC is greater than that provided by the DFFE Online ST. The proposed development area includes three vegetation types that are listed as Least Concern (LC) by the Red List of Ecosystems (RLE), and intersects in some areas with CBAs and ESAs.

The anticipated impacts include vegetation clearing, loss of individual SCC, alien invasive species, soil erosion, chemical contamination, fire, reduced and restricted movement, altered flow regimes, disturbance and/or displacement, and mortality. Cumulative impacts include those that affect broad-scale ecological processes. With adherence to the prescribed mitigation measures opportunities exist to promote conservation efforts, community engagement and education, and local environmental monitoring and research.

It is the Specialists opinion that the DFFE Online ST Assessment of Very High Sensitivity in the Terrestrial Biodiversity Theme for some areas is accurate. High sensitivity areas are predominantly CBAs and an area attributed to high floral sensitivity. Remaining areas are listed as Medium Sensitivity or Low Sensitivity.

**It is the Specialists opinion that the proposed Khoe WEF may be considered for development, provided all mitigation measures are adhered to.**

## FAUNAL

Two non-avian SCCs were identified as relevant sensitivity features in the animal species theme output of the Screening Tool, namely the Least Concern Caledon Copper (*Aloeideas caledoni*, a butterfly) and Critically Endangered Riverine Rabbit (*Bunolagus monticularis*), both listed as 'Medium' sensitivity indicating the potential to occur on the study site. Two additional non-avian animal SCCs were determined relevant to the proposed development, namely the Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*).

A camera trap survey was conducted at 11 sampling locations (two on-site and nine off-site) in and around the proposed development area between 17 February 2022 and 23 December 2022, resulting in 1,832 camera trap days. A total of 2,778 independent records of 3,269 animals representing 66 species were recorded across the broader area. No Riverine Rabbit were recorded present on the Khoe WEF site, but were regularly recorded during simultaneous monitoring in the broader area. Grey Rhebok were confirmed on site and while Caledon Copper and Leopard were not confirmed on site, both were assumed to be present for the purposes of the assessment.

The animal sensitivity of the site was mapped through consideration of existing impacts, potential impacts of the proposed development and important ecological processes that *should* be acting across the site and broader area. Conservation objectives for all animal SCCs relevant to the project highlight the importance of dispersal corridors across the landscape to maintain genetic diversity and long-term studies on population dynamic. Agricultural activity across the site has modified the majority of preferred Riverine Rabbit habitat and obstructed potential animal movement corridors. The proposed development presents an opportunity to provide a land-use alternative to agricultural activity that is more compatible with conservation objectives for animal SCCs. Impacts can be minimized through in-situ biodiversity rehabilitation, specifically through the restoration of strategic, currently modified areas to improve habitat connectivity for animal SCCs relative to the present condition.

The **proposed development is acceptable from an animal perspective** on condition that strategic areas of existing agricultural land be appropriately rehabilitated.

## FLORA

The site is classified as High Sensitivity with areas characterized as Medium and Low Sensitivity by the DFFE Online Screening Tool (ST). Up to 1,782 plant species are potentially present on site, of which 48 are listed as SCC by the DFFE Online ST. Given the high number of species potentially present it is likely the number of SCC is greater than that provided by the DFFE Online ST. The proposed development area includes three vegetation types that are listed as LC by the RLE, and intersects in some areas with CBA and ESA.

The anticipated impacts include vegetation clearing, loss of individual SCC, alien invasive species, soil erosion, chemical contamination, and fire. Cumulative impacts include those that affect broad-scale ecological processes and conservation objectives. With adherence to the prescribed mitigation measures opportunities exist to promote conservation efforts, community engagement and education, and local environmental monitoring and research.

It is the Specialists opinion that SCC are likely present on site, therefore the DFFE Online ST Assessment of High Sensitivity in the Plant Species Theme for some areas is accurate. High sensitivity areas are predominantly those listed as CBAs. All other areas are either Medium Sensitivity or Low Sensitivity.

**It is the Specialists opinion that the proposed Khoe WEF may be considered for development, provided all mitigation measures are adhered to.**

## AVIFAUNA

The main surveys were conducted over a 12-month period in 2022-2023 and undertaken simultaneously with surveys of another proposed wind farm site at Hugo. The Khoe site is approx. 4,113 ha in size and comprised mainly agricultural areas with farm dams centrally placed and small ridges to the north and east.

The DFFE Screening Tool (Animal Theme) classified the area as of High Sensitivity (based on the presence of four Red Data species). Birdlife South Africa's national Avian Sensitivity Map suggests low to medium-high sensitivity for birds and Wind Energy Facility. Inspection of the national bird atlas data set (SABAP 2) including our own species records added an additional Red Data species (Lanner Falcon *Falco biarmicus*) and other collision-prone species. We, thus, concur with the Screening Tool's assessment that the site is of High Sensitivity, and the data and models that follow allow us to reduce risk by constructing a detailed spatial picture of the risks to the Priority birds present.

Over four seasons, 1,159 flights of 16 Priority species were recorded in 465 hours of observations across the proposed Khoe farm. The Collision Risk Modelling (CRM) based on a new (New et al. 2015) formulation of the previous Band model calculates risk classes across all areas of the farm based on the volume of flights, flight heights and their duration, and incorporates an assessment of topographic and environmental factors.

Of the 16 Priority species, eight Red Data species and eight Least Concern species were recorded and mapped.

The highest risk areas (Class 5.0 and above) were strongly clumped in the eastern and northern sections, due mainly to high flight rates of Blue Cranes and Verreaux's Eagles. The risky threshold chosen (Class 5.0+) encompassed more than 75% of risky flights for two species (Verreaux's Eagles and Black Harrier), and 50% of such flight for six of the seven species. The areas are classified as too risky for development and allocated as No-Go areas. The resulting identification of risk across spatially explicit areas indicated the north-eastern and central areas were high risk for Red Data species and the central and northern areas were high risk for Least Concern species. This resulted in 66.6% of the area designated for Khoe Wind Energy Facility as No-Go for turbines. Of the 29 proposed turbines, all avoid the riskiest areas predicted by the CRM. Note that some of them fall within the 3.7 km Verreaux's Eagle circular nest buffer, but no risk areas were identified for eagles within the sliver of the buffer inside the south-west boundary. For this reason, we favoured the CRM results as more precise than the coarse buffer approach.

These high-risk class areas covered 67% of the area, leaving 33% of the area classified as medium- or low-risk to the Priority birds recorded, mainly in the south-west of the study site. Turbines in areas classified as risk Class 4.5 require one-tier of mitigations: either patterned-blades or shut-down-on-demand (SDOD) – automated, or human-led. Those in Class 4.0 require no extra mitigation. Should one Critically Endangered or Endangered bird be killed per

year at any turbine then an additional tier of mitigation must be applied. For Other Red data species, the threshold triggering mitigation is 1 to 2 fatalities depending on the species.

According to available information consulted during this study to date, there are no fatal flaws which should prevent the wind farm from proceeding (assuming all mitigation measures will be implemented) from an avifaunal sensitivity perspective.

## BATS

Data from passive monitoring systems, fieldwork sessions, roost surveys, and a desktop study informed this report. Six static SM4BAT systems were deployed within the project site, with four systems located near-ground at 10 m, to represent the various biotopes, and two on the met mast, within the sweep of the turbine blades, at 50 m and 100 m.

The proposed study area falls within the Fynbos Biome, with three main vegetation types being represented on site. There are several areas of conservation value in the region of the proposed Khoe WEF, but none of these borders the proposed wind farm. The nearest registered reserve, the Bokkeriviere Nature Reserve, is situated approximately 20 km in a north-westerly direction. Two Mountain Catchment Areas are situated very close to the proposed Khoe WEF site, the Matroosberg Mountain Catchment Area, approximately 5 km from the border of the Khoe WEF, and the Langeberg-Wes Mountain Catchment Area, approximately 15 km from the border of Khoe WEF.

Of the 12 species with distribution ranges that include the proposed development area, three have a conservation status of Near Threatened in South Africa and one Vulnerable, while two have a global conservation status of Near Threatened. According to the likelihood of fatality risk, as indicated by the latest pre-construction bat guidelines six species, namely Natal long-fingered bat, Egyptian free-tailed bat, Roberts's flat-headed bat, Cape roof bat and the two fruit bats) have a high risk of fatality, while Temminck's myotis bat has a medium-high risk and the endemic Long-tailed house bat has a medium risk of fatality.

Passive monitoring data for the period between 30 December 2022 and 7 March 2024 is included in this report. *L. capensis* was the most abundant species recorded (55%), while 37% of the calls were of those bats like the high-flying Egyptian free-tailed bat, which has a narrow wing morphology adapted for open air space. 4% of the activity recorded was similar to Natal long-fingered bat, 3% was Roberts's flat-headed bat, and a statistically insignificant number of the endemic Long-tailed house bat.

The average monthly activity shows that bats are generally most active during the summer months, followed by autumn and spring, with reduced activity during the winter months. Peak activity was recorded in March, November and December 2023, with general high activity from February to May 2023, and again from October 2023.

Due to the general high bat activity on site, the development areas were classified as medium sensitive. It will therefore be necessary to mitigate turbines early in the operational phase. No turbine components are allowed in high-sensitivity zones. At present no turbines are positioned in medium-high sensitivity zones either, but if turbines are placed on medium-high sensitivity zones, curtailment will have to be applied after the testing of those turbines, when they start to turn.

The overall potential negative impact of the proposed Khoe WEF on bats, combined for all the development phases, is predicted to be moderate negative without mitigation, while low negative with mitigation.

Based on the findings of the 14 months of pre-construction bat monitoring undertaken at the proposed Khoe WEF project site, the bat specialist is of the opinion that no fatal flaws exist which would prevent the construction and operation of this wind farm, but bat activity is high, and mitigation measures should be adhered to. The EA may be granted, subject to the implementation of the recommended mitigation measures.

### HERITAGE AND ARCHAEOLOGY

The palaeontological assessment indicates that the proposed Khoe WEF is underlain by several coastal to shallow marine formations of the Table Mountain and Bokkeveld Groups of the Cape Supergroup, of Early to Middle Devonian age (c. 410 – 390 Ma), some of which have fossils preserved within them.

According to SAHRA's palaeo-sensitivity map, the Khoe WEF footprint is in an area of generally very high or high palaeontological sensitivity. However, a palaeontological assessment for the adjacent proposed Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual palaeontological sensitivity of that project area is much lower than indicated on the SAHRA map.

Based on experience and the lack of any previously recorded fossils from the area, Bamford (2024) indicates that it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary and there is a moderate to small chance that fossils may occur in the mudstones of the Ceres Subgroup or in the Table Mountain and Bokkeveld Groups bedrock. This potential is very variable and is negatively affected by the folding and tectonic deformation of these formations within the Cape Fold Belt mountains.

Based on these reports, it was assumed prior to the TerraMare Archaeology site visit that Stone Age resources in and around the Khoe WEF would be rare. This was confirmed by the site visit which found virtually no evidence, apart from occasional, isolated stone artefacts, of archaeological sites within the area that will form part of the Khoe WEF development footprint.

This assessment has found that the area identified for the proposed Khoe WEF is a heritage environment of variable sensitivity but that significant impacts on palaeontological and archaeological resources arising from the project are unlikely and no fatal flaws have been identified. Impacts to the cultural landscape are expected to be significant, but these can be reduced through the implementation of suitable mitigatory measures. If the project were not implemented, the site would stay as it currently is with a neutral impact significance.

Despite the impacts to the cultural landscape, it is expected that mitigation measures will allow impacts to be managed.

It is our considered opinion, therefore, that the proposed Khoe WEF may be authorised, but subject to the recommendations contained within this report.

## PALEONTOLOGY

The project lies in the central part of the Cape Supergroup rocks where the Early and Middle Devonian rocks of the Ceres Subgroup (Bokkeveld Group, Cape Supergroup) are well represented.

A palaeontology Impact Assessment (PIA) was commissioned as part of the HIA (Bamford, 2024).

The (PIA) makes the following recommendation:

- Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. There is a moderate to small chance that fossils may occur in the mudstones, of the Ceres Subgroup that lie below the soils or in rocky outcrops.
- Therefore, a Fossil Chance Find Protocol should be added to the EMP. If fossils are found by the environmental officer, or other responsible person once excavations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends and alternative approach. It should be noted that soil cover is likely to obscure any fossils.

The impact on the palaeontological heritage would be moderate to low but the impact can be mitigated by a palaeontologist or ECO collecting and removing any important fossils. There are therefore no objections on paleontological heritage grounds to authorisation of the proposed development.

## VISUAL/LANDSCAPE

Overall, the significance of the visual impacts associated with the proposed Khoe Wind Energy Facility is expected to be very high to high as a result of the generally undeveloped character of the landscape and its inability to absorb changes of this magnitude. Additionally, the facility would be visible within an area that contains certain sensitive visual receptors who already consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors include people travelling along the R318 and secondary roads, as well as, residents of rural homesteads and tourists passing through or holidaying in the region.

Night time impacts have also been assessed whereby it was determined that the significance of lighting (particularly aircraft warning lighting mounted on the turbines) on the nightscape would be high post mitigation. As discussed, the greater environment is largely natural in character with limited built infrastructure. Unblemished night skies are a key attribute to the study areas sense of place and night time visual character. Light sources in the area are limited to isolated farm and homesteads and fleeting light from passing cars travelling along the R318 and other secondary roads. Therefore, the introduction of new light sources into a relatively dark night sky, will have an impact on the visual quality of the study area at night.

According to the Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning (DEA&DP) Guideline for Involving Visual and Aesthetic Specialists in the EIA Process (Oberholzer, 2005), the criteria that determine whether or not a visual impact constitutes a potential fatal flaw are categorised as follows:

1. Non-compliance with Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites.
2. Non-compliance with conditions of existing Records of Decision.

3. Impacts that may be evaluated to be of high significance and that are considered by the majority of the stakeholders and decision-makers to be unacceptable.

In terms of the above and to the knowledge of the author, the proposed development is compliant with all Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites, as well as, conditions of existing Records of Decisions. However, it must be noted that as per the *Guideline for the Management of Development on Mountains, Hills and Ridges of the Western Cape (April 2002)*, development on the crest of a mountain, hill or ridge will be strongly discouraged. Of the 29 turbines proposed, 24 are located on mountains and tall hills identified as having a high visual sensitivity and where development in these buffers is not considered best practice and should be avoided. Owing to the extremely close proximity of sensitive visual receptors to the proposed Khoe WEF, turbines placed on elevated terrain, such as mountains and tall hills, exacerbate the already very high visual impact on these receptors. As such, turbines placed on these areas will not be supported.

Furthermore, with regards to point 3 above, it has been established through the course of this assessment that many objections to the proposed Khoe WEF have been raised by stakeholders within the region, as communicated by the EAP and social impact specialist. Based on the objections received and the overall lack of support for wind energy facilities in the region, the author is of the opinion that the overall very high to high significance of the visual impacts anticipated for the proposed Khoe WEF are considered by the majority of the stakeholders and decision-makers to be unacceptable and that the statistical majority of objecting stakeholders has been exceeded. If evidence to the contrary surfaces during the progression of the development application, the specialist reserves the right to revise the statement below.

In light of the above assessment and the outcomes determined thereof, the author is of the opinion that the visual impacts associated with **the proposed Khoe Wind Energy Facility has exceeded acceptable limits and is considered fatally flawed from a visual perspective.** The author therefore does not support the authorisation of this project owing to the following:

- The overall very high to high visual impacts;
- The very high cumulative impact;
- Majority of the turbines are located on mountain and tall hills rated as having a high sensitivity;
- Majority of the stakeholders are against the project;
- The proposed Khoe WEF is located in significant proximity to sizeable established and planned tourism operations;
- Turbines are located within the buffer zones of protected areas and private nature reserves; and
- The proposed Khoe WEF will result in significant loss of sense of place and uniqueness of landscape character.

#### **EAP Motivation**

According to the visual assessment, landowners/receptors and travelers may view the turbines in a negative light, for others, wind turbines are not regarded as visually intrusive. The perception of what constitutes a negative visual impact is therefore personal and subjective. We have considered the responses from all Interested and Affected Parties (I&APs). In response, detailed simulations and visualisations were undertaken from various guesthouses to

understand and address potential visual impacts. Adjustments to turbine placement was made based on the outcome of the visual impact assessment. Despite these efforts, some opposition persists.

The turbines located in high sensitivity areas are positioned there to take advantage of the optimal wind resource. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition.

I would also like to highlight the proposed Exemia game reserve (where the objections persist). Currently, the proposed campsite area remains undeveloped, and no concrete plans have been provided, so it is considered a future intent project.

Although the wind farm's visual impact on residents and tourism is high, the decision to proceed with its development is motivated by its considerable environmental and economic benefits. The project will contribute to the aforementioned frameworks, Western Cape Green Economy Strategy and Just Energy Transition and this transition is important to the country and to the future growth and sustainability as an organisation.

The establishment of the Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth. The nearest rural community is approximately 7.5 km from the proposed wind farm site. The development of the wind farm is expected to boost the local economy by creating job opportunities and supporting local businesses.

Additionally, traffic mitigation measures will be enforced to minimize disruptions for local residents and tourism activities, ensuring that the overall benefits of the wind farm outweigh the challenges.

## NOISE

A full environmental impact assessment was conducted because the project area was rated as having a potentially high sensitivity to noise. The surroundings of the project focus area are sparsely populated with a few noise-sensitive developments. Most dwellings featuring in the vicinity of the project focus area are scattered in a heterogeneous fashion, typical of a rural farming area. Croplands, animal husbandry and limited residential activities (farmers and workers with their families) are predominant in the study area.

Residential areas and potential noise-sensitive developments/receptors/communities (NSR) were identified using aerial images as well as physical site visits, with the site visits verifying a number of structures used for residential activities. The potential noise impacts are assessed on these NSR in this noise study.

These noise receptors were identified using aerial imagery as well as a physical site visit. Methodology used by the specialist aimed to measure ambient sound levels. Ambient sound levels were measured in the vicinity of the project area in a semi-continuous manner over a period of 7-nights in December 2022 and again over 4-nights during September 2023 (resulting in approximately 4,000 daytime and 2,000 night-time measurements – each with a duration of 10-minutes). The highest fast-weighted sound level measured for daytime activities was more than 75 decibels A (dBA) and the lowest level was less than 20 dBA. Measurements collected at night-time periods reported the highest fast-weighted sound level of more than 75 dBA and the lowest sound level was less than 20 dBA. Average sound levels for daytime fast-weighted sound levels are 54.9 dBA and night-time fast-weighted sound levels are 47.8 dBA.



Acceptable noise limits for daytime is 45 dBA with a maximum noise limit of 52 dBA. Night-time rating levels is reported as 35 dBA with a noise limit of 42 dBA. These limits are typical of a rural noise district.

The applicant should also develop and implement an environmental noise monitoring programme at selected NSR living within the 42 dBA noise contour.

The proposed turbine layout is considered acceptable from a noise perspective (subject total noise levels are less than 45 dBA at all NSR locations used for residential purposes). There is no restriction in the WTG that the applicant could use, though the applicant must monitor noise levels, the response of receptors to the noise levels and ensure that night-time noise levels are less than 45 dBA at all receptors (structures used for permanent residential purposes). Subject to this condition, **it is recommended that the proposed Khoe WEF (and associated infrastructure) be authorized.**

### SOCIO-ECONOMIC

The findings of the Social Impact Assessment (SIA) indicate that proposed Khoe WEF project will create several social and socio-economic benefits, including creation of employment and business opportunities during both the construction and operational phase. In addition, the WEF will generate renewable energy that will improve energy security in South Africa and contribute towards reducing the countries carbon footprint. However, the benefits associated with the WEF are not site dependent and would also be associated with an alternative site.

Based on the findings of the VIA, the Khoe WEF will have a very high negative impact on the areas sense of place. The cumulative impacts on the area's sense of place will also be very high negative. Effective mitigation is not possible. Based on this finding the visual impacts associated with the proposed Khoe WEF exceed acceptable limits and are considered as a fatal flaw from a visual perspective. The development of the Khoe WEF is therefore not supported by the VIA. The findings of the SIA support the findings of the VIA. Given the areas visual sensitivity and number of established nature reserves and associated eco-tourism facilities, the Khoe WEF is located in an area that is not regarded as suitable for the establishment of a large-scale wind energy facility.

Based on the findings of the SIA the development of the proposed Khoe WEF is not supported. The suitability of establishing large WEFs, including the proposed Khoe WEF, in the area to the south of the N1 is questioned. The development of renewable energy facilities in the area to the south of the N1 represents a spillover from the Komsberg REDZ located to the north of the N1. From a long-term planning perspective this not ideal, specifically given the environmental and scenic qualities of the area. In this regard the Western Cape Provincial Spatial Development Framework highlights the importance to the Province's landscape and scenic assets and threat posed by large scale infrastructural developments such as wind farms. The Langeberg Spatial Development Framework also identifies the R318 as scenic route highlights the importance of:

- Preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture.
- Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction.
- Promoting tourism to develop sensitively and contribute to the protection of the landscape and heritage landscape.

It is also important to note that the benefits associated with the WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.

### **EAP MOTIVATION**

As mentioned above, the Western Cape Provincial Development Framework Western Cape's cultural and scenic landscapes are significant assets that underpin the tourism economy, however according to the key Provincial climate change challenge, the plan is to devise and introduce effective adaptation and mitigation responses, especially for vulnerable municipalities. One of the focus areas for mitigation is renewable energy, which is directly applicable to this Project application. Support emergent Independent Power Producers (IPPs) and sustainable energy producers (wind, solar, biomass and waste conversion initiatives) in suitable rural locations.

Furthermore, with load shedding costing South Africa's economy R500 million per stage, per day and the Western Cape's economy R75 million per stage (according to BusinessTech 2021), the country's energy crisis, needs large-scale private sector participation, in partnership with government. This will be key in addressing the current shortfall in the Western Cape.

To accelerate the decarbonisation of South Africa's economy and support economic growth, government from South Africa, France, Germany, the United Kingdom and the United States, along with the European Union announced a long-term Just Energy Transition Partnership in November 2022.

The Western Cape Climate Change Response Strategy (WCCCRS) was adopted in February 2014. The strategy is an update of the 2008 Western Cape Climate Change Response Strategy and Action Plan. The key difference with the 2008 Strategy is a greater emphasis on mitigation, including strategically suitable renewable energy development. The development of the WEF will contribute to national and global efforts to significantly reduce Green House Gas (GHG) emissions and build a sustainable low carbon economy, which simultaneously addresses the need for economic growth, job creation and improving socio-economic conditions.

Given the aforementioned framework and the Western Cape Green Economy Strategy, the establishment of this Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth.

The developer has taken into account the visual impact findings and has revised the layout multiple times to minimize visual impacts. However, the specific turbines (of the 29 turbines, 24 are located on mountain, hill or ridge) are located in high sensitivity areas are positioned there to take advantage of the optimal wind potential. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition, bearing in mind that this transition is important to the country and to the future growth of the renewables sector.

### **TRAFFIC AND TRANSPORTATION**

The extent of the study area covers key routes and intersections within a 10 km radius near the development on which the expected traffic generated by the development may have a significant impact. Thus, the following intersections were included in the study area:

- Intersection 1: N1 (Beaufort west - Worcester) and R318 (Montagu);

- Intersection 2: R318 and Road DR01442;
- Intersection 3: R318 and Road OP05749;
- Intersection 4: R318 and OP5748 (Road to Middleberg);
- Intersection 5: R318 and DR01428 (Road to Nougaspoort); and
- Intersection 6: R318 and OP05962 (Road to Keerom O/G Pad).

The volume of traffic on the Main Road R318 is relatively low compared to traffic volumes along the N1 National Road. Similarly, all other roads (Road DR01442, Road OP05749 and Road OP05748) carry significantly very low levels of traffic volumes compared to both Main Road R318 and the N1 National Road.

Trips generated during the construction phase will primarily comprise of transporting equipment, turbine components, personnel, construction, and other facility materials comprising of normal, heavy, and abnormal load vehicles. It is expected that the construction phase will have the highest traffic impact of all the phases.

Another contributor to trips generated to the site will be daily commuters/workers expected during construction. It has been assumed that a total labour force of approximately 200 -250 workers will be required during construction. Most of the labour force is expected to be sourced from towns in close proximities such as De Doorns, Worcester, Touws River with the remainder coming from other areas such as Montagu.

The operational phase is expected to have comparatively minimal traffic impact as the only transport required will be associated with monitoring, operation, and maintenance.

For the decommissioning phase, about 200 people will be needed with similar transport as the construction phase. All parts will be either reused or recycled and would most likely make their way back to the applicable Port. The decommissioning phase is expected to generate the second highest traffic impact after construction as a result of the need to remove the infrastructure and rehabilitate the site.

The base year and forecast year road capacity has indicated that the proposed development will have little to no significant impact on the existing road network capacity and intersection operational performance.

Given the findings of the TIA, it is recommended that the proposed development be considered favourably from a traffic engineering point of view as the intended construction will have no significant negative impact on the surrounding road network. **The project can be considered for environmental authorisation.**

## WAKE EFFECT ANALYSIS

A wake effect impact analysis was not needed for the project as there are currently no surrounding operational nor proposed wind farms within 30 km radius.

## SPECIALIST IMPACT SUMMARY TABLE

### CONSTRUCTION PHASE IMPACTS

Construction Phase	Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude	
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Loss of critical corridors & habitat connectivity	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of habitat/vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Potential spread of alien vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of riparian and or wetland habitat	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Changes to the hydrological regime and	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
increase potential for erosion	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Changes to surface water quality characteristics	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Terrestrial Biodiversity								
Potential vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Potential chemical contamination	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate
Reduced connectivity and restricted movement of fauna	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Potential altered flow regime	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Potential disturbance and/or displacement	Without Mitigation	Regional	Medium Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
Potential mortality of faunal and flora species	Without Mitigation	Local	Long Term	Irreversible	Negative	High	Highly Probable	Very High
	With Mitigation	Site	Medium Term	Recoverable	Negative	Low	Probable	Moderate
<b>Flora</b>								
Vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Chemical Contamination	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate
Altered regime flow	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Mortality of Flora	Without Mitigation	Local	Long term	Irreversible	Negative	High	Highly probable	Very High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
<b>Faunal</b>								
Direct habitat loss	Without Mitigation	Site	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Indirect habitat loss	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Displacement or disturbance	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Moderate
Direct Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	High
Indirect Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	High

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	High
<b>Avifauna</b>								
Displacement of priority species	Without Mitigation	Short term	Short term	Irreversible	Negative	Moderate	Highly likely	Medium- high
	With Mitigation	Short term	Short term	Reversible	Negative	Moderate	Probable	Medium
<b>Bats</b>								
Clearing and excavation of natural habitat	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Definite	Moderate
	With Mitigation	Local	Short term	Recoverable	Negative	Low	Probable	Low
Creating attractive bat habitat within the development terrain	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short term	Reversible	Negative	Low	Low Probability	Very Low
Construction noise	Without Mitigation	Local	Short term	Reversible	Negative	Moderate	Definite	Low
	With Mitigation	Site	Short term	Reversible	Negative	Low	Definite	Very Low
<b>Archaeology, Paleontology and Heritage</b>								
	Without Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Low



Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Disturbance or destruction of fossil material	With Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Very Low
Disturbance or destruction of archaeological sites and/or materials	Without Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Low
	With Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Very Low
Disruption of the cultural landscape due to the presence of construction equipment and activity	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Local	Long term	Recoverable	Negative	Moderate	Definite	Moderate
<b>Visual/Landscape</b>								
Visual impact of construction activities on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF	Without Mitigation	Very Short distance	Short term	Reversible	Negative	Very High	Definite	Very high
	With Mitigation	Very Short distance	Short term	Reversible	Negative	High	Highly Probable	High
Visual impact of construction activities on	Without Mitigation	Very Short distance	Short term	Reversible	Negative	Moderate	Highly Probable	Very high

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
observers travelling along roads within 5 km of the proposed WEF	With Mitigation	Very Short distance	Short term	Reversible	Negative	Moderate	Probable	High
<b>Noise</b>								
Construction of Access Roads	Without Mitigation	Local	Temporary	High	Negative	Medium	Likely	High to Very High
	With Mitigation	Local	Temporary	High	Negative	Low	Possible	High to Very High
Traffic Noises	Without Mitigation	Local	Short term	High	Negative	Medium	Likely	High to Very High
	With Mitigation	Local	Short term	High	Negative	Low	Possible	High to Very High
Daytime construction WTG	Without Mitigation	Local	Short term	High	Negative	Low	Possible	Low
	With Mitigation	Local	Short term	High	Negative	Low	Possible	Low
Night-time construction WTG	Without Mitigation	Regional	Short Term	High	Negative	Medium	Possible	High to Very High
	With Mitigation	Regional	Short Term	High	Negative	Low	Possible	High
<b>Socio-economic</b>								
Creation of employment and	Without Mitigation	Local - Regional	Short Term	n/a	Positive	Moderate	Probable	Moderate

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
business opportunities	With Mitigation	Local - Regional	Short Term	n/a	Positive	Moderate	Highly Probable	Moderate
Impacts on family structures and social networks: Presence of construction workers	Without Mitigation	Local	Short Term	Irreversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	Irreversible	Negative	Low	Probable	Low
Influx of job seekers	Without Mitigation	Local	Short Term	Irreversible	Negative	Low	Probable	Low
	With Mitigation	Local	Short Term	Irreversible	Negative	Low	Probable	Low
Risk to safety, livestock, and damage to farm infrastructure	Without Mitigation	Local	Short Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	Reversible	Negative	Low	Probable	Low
Potential noise, dust and safety impacts	Without Mitigation	Local	Short Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	n/a	Negative	Low	Probable	Low

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Loss of farmland	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short term	Reversible	Negative	Low	Highly Probable	Low
Increased risk of grass fires	Without Mitigation	Local	Short Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	n/a	Negative	Low	Probable	Low
<b>Traffic and Transportation</b>								
Increased peak hour Traffic	Without Mitigation	Regional	Short Term	Recoverable	Negative	Low	Probable	Low
	With Mitigation	Local	Short Term	Reversible	Negative	Low	Probable	Very Low
Increase in abnormal traffic volumes	Without Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	High
	With Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	Moderate
Deterioration of surrounding road network	Without Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low

### OPERATIONAL PHASE IMPACTS

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Potential spread of Alien vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
<b>Terrestrial Biodiversity</b>								
Potential habitat fragmentation impacts	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Potential encroachment of alien invasive species resulting in loss of flora	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low Probability	Moderate
Potential light, noise and visual impacts	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Potential fire	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Potential faunal mortality and loss of SCC	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Reversible	Negative	Low	Low probability	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Soil erosion	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
<b>Flora</b>								
Encroachment of alien invasive species	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
Unwanted Fires	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	High Probability	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Mortality of Flora	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	High Probability	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
Soil erosion	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	High Probability	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
<b>Faunal</b>								
Direct habitat loss	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Recoverable	Negative	Low	Low Probability	High
Indirect habitat loss	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Disturbance/ displacement	With Mitigation	Local	Long term	Recoverable	Negative	Low	Low Probability	High
	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Reversible	Negative	Low	Low Probability	High
Direct Mortality	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Reversible	Negative	Low	Low Probability	High
Indirect Mortality	Without Mitigation	Site	Long term	Irreversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Long term	Recoverable	Negative	Low	Probable	Low
<b>Avifauna</b>								
Bird collision, habitat alteration and displacement	Without Mitigation	Small	Long term	Reversible	Negative	Moderate High	Probable	Highly
	With Mitigation	Small	Long term	Reversible	Negative	Moderate	Probable	Moderate
<b>Bats</b>								
Direct collision or barotrauma	Without Mitigation	Regional	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Regional	Long term	Recoverable	Negative	High	Definite	Moderate
Fatality of migrating bats	Without Mitigation	National	Long term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	National	Long term	Recoverable	Negative	Low	Low Probability	Low

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Loss of bats of conservation value	Without Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Regional	Long term	Reversible	Negative	Low	Low Probability	Low
Fatality curiosity	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Long term	Reversible	Negative	Low	Probable	Low
Smaller genetic pool	Without Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Probable	Low
Loss of foraging space	Without Mitigation	Regional	Long term	Recoverable	Negative	High	Definite	High
	With Mitigation	Regional	Long term	Reversible	Negative	Moderate	Definite	Moderate
<b>Visual</b>								
Visual impact on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF	Without Mitigation	Very Short distance	Short term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
Visual impact on observers	Without Mitigation	Very Short distance	Long term	Reversible	Negative	High	Definite	Very High



Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
travelling along the roads within 5 km to the proposed WEF	With Mitigation	Very Short distance	Long term	Reversible	Negative	High	Definite	Very High
Visual impact on visitors to formally protected areas within 5-10 km to the proposed WEF	Without Mitigation	Very Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
Visual impact on residents of homesteads and visitors to tourist accommodation within 5-10 km to the proposed WEF.	Without Mitigation	Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
Visual impact on observers travelling along roads within 5-10 km to the proposed WEF.	Without Mitigation	Short distance	Long term	Reversible	Negative	High	Definite	High
	With Mitigation	Short distance	Long term	Reversible	Negative	High	Definite	High
Visual impact on residents	Without Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Highly Probable	Moderate

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
of homesteads and visitors to tourist accommodation within 10-20 km to the proposed WEF	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Highly Probable	Moderate
Visual impact on observers travelling along roads within 10-20 km to the proposed WEF	Without Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
Visual impact on visitors to formally protected areas and private nature reserves within 10-20 km to the proposed WEF	Without Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
Visual impact of shadow flicker on sensitive visual receptors in close proximity to	Without Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate

Operation Phase	Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude	
the proposed WEF								
Visual impact of lighting at night on residents and visitors to homesteads and tourist accommodation within 10 km from the proposed WEF	Without Mitigation	Short to medium distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	High	Highly probable	High
Visual impact of lighting at night on observers travelling along roads within 10 km from the proposed WEF	Without Mitigation	Short to medium distance	Long term	Reversible	Negative	High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Highly Probable	High
Visual impact of the ancillary infrastructure on observers in close proximity to the structures	Without Mitigation	Very Short distance	Long term	Reversible	Negative	High	Highly Probable	High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
Visual impact of the	Without Mitigation	Very Short distance	Long term	Reversible	Negative	High	Definite	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
ancillary infrastructure on observers in close proximity to the structures travelling along the R318.	With Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Highly Probable	Moderate
The potential impact on the sense of place of the region	Without Mitigation	Long distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Long distance	Long term	Reversible	Negative	Very High	Highly Probable	Very High
<b>Noise</b>								
Daytime operation of WTG	Without Mitigation	Local	Long Term	High	Negative	Low	Possible	Low
	With Mitigation	Local	Long Term	High	Negative	Low	Possible	Low
Night-time operation of WTG	Without Mitigation	Regional	Long Term	High	Negative	Moderate	Likely	Moderate
	With Mitigation	Regional	Long Term	High	Negative	Low	Possible	Low
<b>Socio-economic</b>								
Improve energy security and support renewable sector	Without Mitigation	Local, Regional and National	Long term	Reversible	Positive	High	Highly Probable	High
	With Mitigation	Local, Regional and National	Long term	n/a	Positive	High	Definite	High



Operation Phase	Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude	
Creation of employment and business opportunities	Without Mitigation	Local and Regional	Long term	n/a	Positive	Low	Highly Probable	Moderate
	With Mitigation	Local and Regional	Long term	n/a	Positive	Moderate	Highly Probable	Low
Generate income for affected landowners	Without Mitigation	Local	Long term	Reversible	Positive	Low	Highly Probable	Low
	With Mitigation	Local	Long term	Reversible	Positive	High	Definite	Moderate
Benefits associated with the socio-economic development contributions	Without Mitigation	Local and regional	Long term	Reversible	Positive	Moderate	Probable	Low
	With Mitigation	Local and regional	Long term	Reversible	Positive	High	Definite	Moderate
Visual impact and impact on sense of place	Without Mitigation	Long distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Long distance	Long term	Reversible	Negative	Very High	Definite	Very High
Potential visual impact based on comments from local landowners	Without Mitigation	Local	Long term	Reversible	Negative	High	Highly probable	High
	With Mitigation	Local	Long term	Reversible	Negative	High	Highly probable	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Potential impact on value of visually affected properties	Without Mitigation	Local	Long Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Long Term	Reversible	Negative	Low	Probable	Low
Potential impact of the WEF on tourism operations that are visually impacted	Without Mitigation	Local	Long Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Long Term	Reversible	Negative	Low	Probable	Moderate
Potential impact of the WEF on local tourism in the area	Without Mitigation	Local	Long Term	Reversible	Negative	Low	Improbable	Moderate
	With Mitigation	Local	Long Term	Reversible	Negative	Low	Improbable	Moderate
<b>Archaeology, Paleontology and Heritage</b>								
Disruption of the cultural landscape due to the presence of construction equipment and activity	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Local	Long term	Recoverable	Negative	Moderate	Definite	Moderate
<b>Traffic and Transportation</b>								
Increase in general peak hour traffic volumes	Without Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Very Low
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Very Low

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Increase in abnormal traffic volumes	Without Mitigation	Regional	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Regional	Immediate	Recoverable	Negative	Low	Low Probability	Moderate
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Low Probability	Low
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Improbable	Very Low
Deterioration of surrounding road network	Without Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low

### DECOMMISSIONING PHASE IMPACTS

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Loss of critical corridors & habitat connectivity	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of habitat/vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of riparian and or wetland habitat	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Changes to the hydrological regime and increase potential for erosion	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Changes to surface water quality characteristics	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
<b>Terrestrial Biodiversity</b>								
Potential vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Reduced connectivity and restricted movement of fauna	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Potential disturbance and/or displacement	Without Mitigation	Regional	Medium term	Recoverable	Negative	Moderate	Highly probable	High
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
Potential mortality of	Without Mitigation	Local	Long term	Irreversible	Negative	High	Highly probable	Very High



Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
faunal and flora species	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
<b>Flora</b>								
Mortality of Flora species	Without Mitigation	Local	Long term	Irreversible	Negative	High	Highly probable	Very High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
<b>Faunal</b>								
Direct habitat loss	Without Mitigation	Site	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Indirect habitat loss	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Displacement or disturbance	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Direct Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Indirect Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Impacts of all phases of the proposed development on ecological processes of the area	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly Probable	Moderate
<b>Bats</b>								
Decommissioning activities	Without Mitigation	Local	Short term	Recoverable	Negative	Moderate	Definite	Moderate
	With Mitigation	Local	Short term	Reversible	Negative	Low	Definite	Low
<b>Socio-economic</b>								
Retrenchment including loss of jobs, and source of income	Without Mitigation	Local	Short term	n/a	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short term	n/a	Negative	Low	Probable	Low
<b>Traffic and Transportation</b>								
Increase in general peak hour traffic volumes	Without Mitigation	Regional	Short Term	Recoverable	Negative	Low	Probable	Low
	With Mitigation	Local	Short Term	Reversible	Negative	Low	Probable	Very Low
Increase in abnormal traffic volumes	Without Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	High
	With Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	Moderate



Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
Deterioration of surrounding road network	Without Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
<b>Archaeology, Paleontology and Heritage</b>								
Disruption of the cultural landscape due to the presence of construction equipment and activity	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Local	Long term	Recoverable	Negative	Moderate	Definite	Moderate

**CUMULATIVE PHASE IMPACTS**

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Cumulative impact assessment for aquatic biodiversity	Without Mitigation	Local	Long Term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Low Probability	Low
<b>Terrestrial Biodiversity</b>								
Potential changes in	Without Mitigation	Regional	Long Term	Recoverable	Negative	Moderate	Highly Probable	High



Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
broad-scale ecological processes brought on by vegetation clearing	With Mitigation	Regional	Long term	Recoverable	Negative	Low	Low Probability	Moderate
<b>Flora</b>								
Cumulative impacts on changes to broad scale ecological processes	Without Mitigation	Regional	Long Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Regional	Long term	Recoverable	Negative	Low	Low Probability	Moderate
<b>Faunal</b>								
Impacts of landcover and land-use to the long-term persistence and viability of animal SCCs in the area	Without Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Regional	Long term	Recoverable	Positive	Moderate	Probable	High
<b>Avifauna</b>								
Cumulative impacts on birds during construction and operation	Without Mitigation	Small	Short term	High	Negative	Moderate	Highly Likely	High
	With Mitigation	Regional	Short term	Low	Negative	Moderate - high	Probable	Moderate - high
<b>Bats</b>								
Activities associated	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Definite	Moderate

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
with construction of solar farms within 30 km combined with the wind farm	With Mitigation	Local	Short term	Recoverable	Negative	Low	Probable	Low
<b>Visual</b>								
The potential cumulative visual impact of wind farms on the visual quality of the landscape	Without Mitigation	Medium distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Medium distance	Long term	Reversible	Negative	Very High	Definite	Very High
<b>Noise</b>								
Numerous WTG operating simultaneously from various WEFs in area	Without Mitigation	Regional	Long Term	High	Negative	Low	Possible	Low
	With Mitigation	Regional	Long Term	High	Negative	Low	Possible	Low
<b>Visual/Landscape</b>								
The potential cumulative visual impact of wind farms on the visual quality of the landscape.	Without Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
<b>Socio-economic</b>								

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
The potential cumulative visual impact of wind farms on the visual quality of the landscape	Without Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
The potential cumulative impact on local services	Without Mitigation	Local	Long-term	Reversible	Negative	Low	Probable	Low
	With Mitigation	Local and regional	Long-term	Reversible	Negative	Moderate	Probable	Low
The potential cumulative impact on local economy	Without Mitigation	Local	Long-term	Reversible	Positive	Moderate	Highly Probable	Low
	With Mitigation	Local and regional	Long-term	Reversible	Positive	Moderate	Highly Probable	High
<b>Traffic and Transportation</b>								
Increased traffic on the route and access points to site	Without Mitigation	Regional	Short Term	Recoverable	Negative	Moderate	Probable	Probable
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Probable
Increase in abnormal traffic volumes	Without Mitigation	Regional	Short Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Regional	Short Term	Recoverable	Negative	Moderate	Probable	Probable
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Recoverable	Negative	Low	Low Probability	Low

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Deterioration of surrounding road network	Without Mitigation	Regional	Short Term	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Low

## DFFE: INFORMATION REQUIREMENTS FOR WIND ENERGY FACILITIES

The DFFE's requirements for information for all applications for WEFs are included in this section of the report. Where this information is not provided in the tables below, the location of where it can be found in the report is indicated.

**TABLE 0.1 DETAILS OF THE AFFECTED FARM PROPERTIES AND SG 21 CODES**

Farm Name	Portion No.	Farm No.	SG 21 Codes
Farm Eendragt	1 (RE)	38	C05000000000003800001
Farm Eendragt	2	38	C05000000000003800002
Farm Eendragt	11	38	C05000000000003800011
Farm Plaas 193	0	193	C05000000000019300000
Farm Eendragt	RE	37	C05000000000003700000

**TABLE 0.2 GENERAL SITE INFORMATION**

Component	Description/Dimensions
Copies of deeds of all affected farm portions	Submitted with the Application Form to the DFFE.
Location of the site	Approximately 20 km northwest of De Doorns within the Langeberg Local Municipality and the Cape Winelands District Municipality.
Facility Area	Approximately 85 hectares. This is the permanent development footprint
Photos of areas that give a visual perspective of all parts of the site	Refer to the Visual Impact Assessment Report (Volume II).
Photographs from sensitive visual receptors (tourism routes, tourism facilities, etc.)	Refer to the Visual Impact Assessment Report (Volume II).

**TABLE 0.3 WEF TECHNICAL DETAILS**

WEF Technical Components	Description/Dimensions - Khoe
Maximum Generation Capacity	up to 232 MW
Turbine Capacity	Up to 8 MW
Type of technology	Onshore Wind
Number of Turbines	Up to 29
WTG Hub Height from ground level	up to 150 m



WEF Components	Technical Details	Description/Dimensions - Khoe
Blade Length		up to 100 m
Rotor Diameter		up to 200 m
Structure height (Tip Height)		up to 250 m
Structure orientation		Wind regiment dependent
<b>Area occupied by both permanent and construction laydown areas</b>		<ul style="list-style-type: none"> <li>Concrete turbine foundations - approximately up to 1,000 m<sup>2</sup> per turbine</li> <li>Each turbine will have a hardstand area of approximately up to 7,500 m<sup>2</sup> per turbine</li> <li>Temporary laydown areas (with a combined footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area; and</li> <li>A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha)</li> </ul>
Operations and maintenance buildings (O&M building) with parking area		up to 1 ha
Site Access		Via the R318
Area occupied by inverter transformer stations/substations		up to 2.5 ha
Capacity of on-site substation		132/33 kV
Battery Energy Storage System footprint		up to 5 ha
BESS type		Lithium-ion technology
Width of internal roads		Access roads to the site and between project components with a width of approximately 4.5 m and a servitude of 13.5 m.
Proximity to grid connection		This has not been determined at this stage of the Project.
Internal Cabling		Cabling between the turbines, to be laid underground where practical.
Height of fencing		Up to 3 m
Water supply, volumes required		±26,500 m <sup>3</sup> for the construction, commissioning and test phase (±26 months), the majority being consumed during year-one of the construction. ±90 m <sup>3</sup> /annum for the life-of-WEF (20-25 years)

TABLE 0.4 SITE MAP AND GIS INFORMATION

Site Maps and GIS Information	Report Reference
All maps/information layers are provided in ESRI Shapefile format.	
All affected farm portions must be indicated.	Figure 2

Site Maps and GIS Information	Report Reference
The exact site of the application must be indicated (the areas that will be occupied by the application).	Figure 1
A <i>status quo</i> map/layer must be provided that includes the following: Current use of land on the site including:	
Buildings and other structures	Figure 4
Agricultural fields	Figure 4
Grazing areas	Figure 4
Natural vegetation areas (natural veld not cultivated for the preceding 10 years) with an indication of the vegetation quality as well as fine scale mapping in respect of Critical Biodiversity Areas and Ecological Support Areas	Figure 5
Critically endangered and endangered vegetation areas that occur on the site	Figure 5
Bare areas which may be susceptible to soil erosion	Figure 5
Cultural historical sites and elements	Section 6.5 and 6.6
Rivers, streams and water courses	Figure 5
Fountains, boreholes, dams (in-stream as well as off-stream) and reservoirs	Figure 5
High potential agricultural areas as defined by the Department of Agriculture, Forestry and Fisheries	Figure 4
Buffer zones (also where it is dictated by elements outside the site): 500 m from any irrigated agricultural land 1 km from residential areas	Section 6
Indicate isolated residential, tourism facilities on or within 1 km of the site	Section 6.7
A map/layer that indicate locations of birds and bats including roosting and foraging areas	Figure 6.1 - 6.3
A site development proposal map(s)/layer(s) that indicate: <ul style="list-style-type: none"> <li>• Turbine positions</li> <li>• Foundation footprint</li> <li>• Permanent laydown area footprint</li> <li>• Construction period laydown footprint</li> <li>• Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible).</li> </ul>	Figure 3

Site Maps and GIS Information	Report Reference
River, stream and water crossing of roads and cables indicating the type of bridging structures that will be used.	Figure 3
Substation(s) and/or transformer(s) sites including their entire footprint.	Figure 2
Cable routes and trench dimensions (where they are not along internal roads) Connection routes to the distribution/transmission network (the connection must form part of the EIA even if the construction and maintenance thereof will be done by another entity such as ESKOM).	Grid connection will form part of a separate application process
Cut and fill areas at turbine sites along roads and at substation/transformer sites indicating the expected volume of each cut and fill	This will be provided in the final design approval of the development layout.
Borrow pits	No borrow pits on site. Licensed borrow pits will be used to source material.
Spoil heaps (temporary for topsoil and subsoil and permanently for excess material) Buildings including accommodation	Temporary and permanent spoil heaps will be kept within demarcated construction areas, and monitored by the ECO during the construction phase.

TABLE 0.5 DEVELOPMENT AREA GEOGRAPHIC COORDINATES – KHOE WEF

WEF Boundary		
Reference point 1	33° 36' 19.66" S	19° 49' 22.29" E
Reference point 2	33° 34' 35.92" S	19° 51' 23.21" E
Reference point 3	33° 34' 30.62" S	19° 52' 10.48" E
Reference point 4	33° 33' 41.69" S	19° 53' 22.80" E
Reference point 5	33° 34' 45.71" S	19° 53' 40.74" E
Reference point 6	33° 35' 18.16" S	19° 55' 42.16" E
Reference point 7	33° 36' 42.15" S	19° 55' 54.43" E
Reference point 8	33° 37' 25.48" S	19° 50' 45.01" E
Reference point 9	33° 37' 21.30" S	19° 54' 6.55" E
Reference point 10	33° 37' 25.83" S	19° 53' 52.34" E
Reference point 11	33° 37' 1.84" S	19° 52' 1.55" E

<b>WEF Boundary</b>		
Reference point 12	33° 37' 12.56" S	19° 51' 57.36" E
Reference point 13	33° 36' 56.04" S	19° 51' 20.80" E
Reference point 14	33° 37' 30.03" S	19° 54' 26.22" E
<b>Preferred Laydown Area</b>		
Northwest Corner	33° 35' 21.49" S	19° 52' 2.50" E
Northeast Corner	33° 35' 8.47" S	19° 52' 12.71" E
Southeast Corner	33° 35' 13.074" S	19° 52' 20.12" E
Southwest Corner	33° 35' 24.60" S	19° 52' 6.51" E
<b>Preferred BESS</b>		
Northwest Corner	33° 35' 24.60" S	19° 52' 6.51" E
Northeast Corner	33° 35' 18.62" S	19° 52' 11.20" E
Southeast Corner	33° 35' 23.37" S	19° 52' 17.35" E
Southwest Corner	33° 35' 29.97" S	19° 52' 12.88" E
<b>Preferred Substation</b>		
Northwest Corner	33° 35' 15.34" S	19° 52' 17.09" E
Northeast Corner	33° 35' 17.97" S	19° 52' 21.14" E
Southeast Corner	33° 35' 23.39" S	19° 52' 17.36" E
Southwest Corner	33° 35' 20.31" S	19° 52' 13.38" E
<b>Preferred OMM</b>		
Northwest Corner	33° 35' 16.00" S	19° 52' 18.16" E
Northeast Corner	33° 35' 13.07" S	19° 52' 20.12" E
Southeast Corner	33° 35' 14.88" S	19° 52' 23.19" E
Southwest Corner	33° 35' 17.95" S	19° 52' 21.16" E
<b>Alternative Laydown Area</b>		

<b>WEF Boundary</b>		
Northwest corner	33° 35' 53.10" S	19° 53' 14.57" E
Northeast Corner	33° 35' 57.81" S	19° 53' 31.83" E
Southeast corner	33° 36' 2.70" S	19° 53' 31.59" E
Southwest Corner	33° 36' 1.92" S	19° 53' 14.82" E
<b>Alternative OMM</b>		
Northwest Corner	33° 35' 49.61" S	19° 53' 14.65" E
Northeast Corner	33° 35' 49.66" S	19° 53' 18.31" E
Southeast Corner	33° 35' 53.17" S	19° 53' 18.16" E
Southwest Corner	33° 35' 53.10" S	19° 53' 14.57" E
<b>Alternative BESS</b>		
Northwest Corner	33° 35' 49.73" S	19° 53' 24.76" E
Northeast Corner	33° 35' 49.89" S	19° 53' 32.15" E
Southeast Corner	33° 35' 57.81" S	19° 53' 31.83" E
Southwest Corner	33° 35' 57.49" S	19° 53' 24.65" E
<b>Alternative Substation</b>		
Northwest Corner	33° 35' 49.66" S	19° 53' 18.31" E
Northeast Corner	33° 35' 49.73" S	19° 53' 24.76" E
Southeast Corner	33° 35' 54.80" S	19° 53' 24.69" E
Southwest Corner	33° 35' 53.17" S	19° 53' 18.16" E

## 1. INTRODUCTION

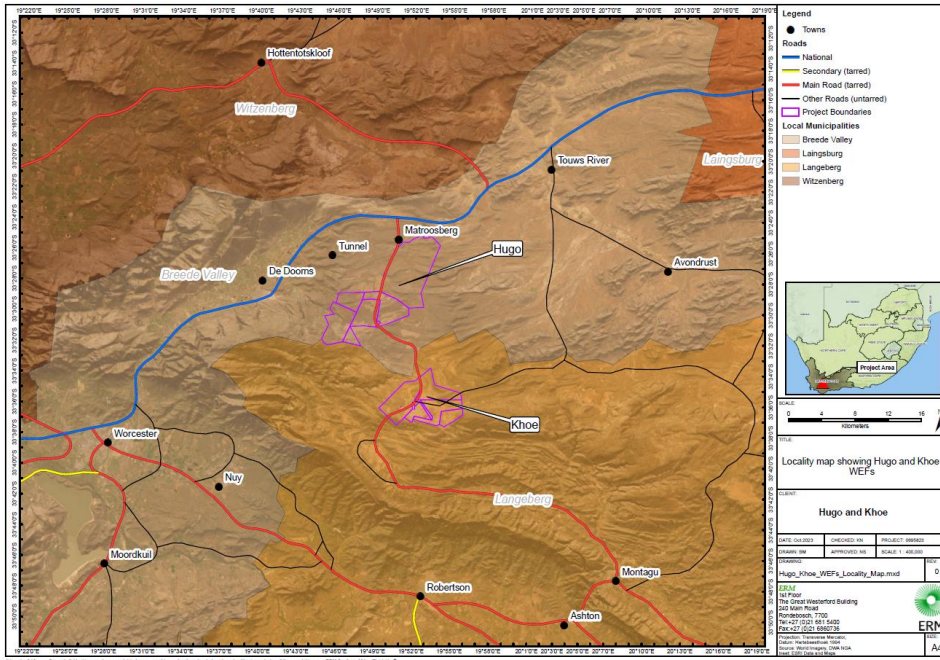
### 1.1 PROJECT OVERVIEW

FE Hugo and Khoe (Pty) Ltd is applying for an Environmental Authorisation to construct and operate the Khoe Wind Energy Facility (WEF) with a capacity of up to 232 MW. Additional ancillary infrastructure to the WEF would include underground and above-ground cabling between project components, onsite substation/s, Battery Energy Storage Systems (BESS), foundations to support turbine towers, internal/ access roads linking the wind turbines and other infrastructure on the site, and permanent workshop area and office for control, maintenance and storage. As far as possible, existing roads will be utilised and upgraded (where needed). The proposed development is located near the De Doorns town in the Western Cape Province. Hereafter, the proposed Khoe WEF as well as its associate infrastructure will be referred to as the "proposed development".

The proposed development is located approximately 20 km southeast of the De Doorns town within the Langeberg Local Municipality and the Cape Winelands District Municipality of the Western Cape Province (see Figure 1-1) FE Hugo and Khoe also proposed to develop and operate the Hugo WEF, which is situated approximately 13 km north of the Khoe WEF. The Hugo WEF forms part of a separate application process. However, it will run parallel to the Khoe WEF application process. As such, this report is strictly pertaining to the development and operation of the proposed Khoe WEF.

As per the requirements of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicant appointed Environmental Resources Management Southern Africa (Pty) Ltd. (ERM) as the independent Environmental assessment Practitioner (EAP) to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for Environmental Authorisation.

FIGURE 1-1 HUGO AND KHOE WIND ENERGY FACILITY LOCALITY MAP



## 1.2 PURPOSE OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT

The National Environment Management Act, 1998 (Act No 107 of 1998) (NEMA) promotes the use of scoping and EIA to ensure the integrated environmental management of activities.

Section 24(1) of NEMA states:

"In order to give effect to the general objectives of integrated environmental management laid down in this Chapter, the potential impact on the environment of listed activities must be considered, investigated, assessed and reported to the competent authority charged by this Act with granting the relevant environmental authorisation."

EIA is ultimately a decision-making process with the specific aim of selecting an option that will provide the most benefit and cause the least impact. The EIA process should identify activities which may have a detrimental effect on the environment, and which would therefore require EA prior to commencement.

### 1.3 DFFE COMMENTS ON THE FINAL SCOPING REPORT

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p><b>1. Application form</b></p>	
<p><b>Date: 20/05/2024</b></p> <p><b>Letter received via Email</b></p>	<p>Ensure the details of the EAP are updated to reflect the latest information and changes to the person responsible for this proposed project.</p>	<p>Application updated accordingly – updated EAP and project details</p>
<p><b>Department of Environmental Affairs and Planning (Mr Sabelo Malaza, Mr Wayne Hector)</b></p>	<p><b>2. Listed Activities</b></p>	
	<p>a) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. The physical footprint of the infrastructure in square metres must be provided in support of the applicability of this listed activity/ies.</p>	<p>All the activities that have been applied for are specific and relevant to the development activity as described in the project description. The relevant activities are included in Table 3.1 of the Draft EIA Report.</p>
	<p>b) Ensure to include thresholds for each activity applied for in the application form. The physical footprint of the infrastructure in square metres/hectares/cubic metres is not mentioned in the application form. As such, you are requested to provide the physical footprint of the infrastructure to motivate the applicability of this listed activity/ies.</p>	<p>These have been included in the application form. Please refer to table 3.1 of the Draft EIA for applicability of listing notices.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	c) Only applicable listed activities must be applied for, and the project description must be specific on what is being proposed in the final EIAR.	Acknowledged by the EAP – applicable listed activities have been applied for.
	d) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports. Provide this information as well as the coordinates of the proposed development in a separate appendix.	Table 0.1 in the Draft EIA Report provides the correct SG codes, farm names and numbers. These have been included as appendix 9 in the application form.
	e) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department’s application form template has been amended and can be downloaded from the following link <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a> .	The listed activities in the scoping report corresponds with the Draft EIA Report
	f) The listed activities represented in the EIAR and the application form must be the same and correct.	The listed activities in Table 3.1 of the Draft EIA Report correspond with the listed activities in the application form.
	g) Landowner consent has not been provided in Appendix 3 submitted with the application form or the draft SR. Ensure that landowner consent is provided with the next document submission.	Landowner consent forms have been included in the updated application form.
	<b>3. Alternatives</b>	
	a) The EAP is required to provide a <b>clear assessment</b> for each identified/ or assessed alternative and further provide clear motivation and reasons as to why the preferred alternative proves to be the preferred compared to other Alternatives. This relates to the location alternative, site layout	An assessment for each identified alternative location, layout alternative and technology alternative has been included. A clear motivation and reason for the selection of the preferred

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	alternatives/design, technology alternative, and Battery Energy Storage Systems alternatives.	alternative have been included in this draft EIA report.
	b) The EIAR must provide the five corner coordinates points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided. Coordinates must be in the format as prescribed by the NEMA EIA Regulations, 2014, as amended. A separate appendix, as indicated above, must be provided for co-ordinates.	Coordinates for the have been included in table 0.5 in the Draft EIA.
	<b>4. Layout &amp; Sensitivity Maps</b>	
	<p>a) All available biodiversity information must be used in the finalisation of the final layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:</p> <ul style="list-style-type: none"> <li>i. Ensure that the titles of the maps are consistent. The preferred layout must be presented in the final layout map.</li> <li>ii. The final envisioned area for the wind facility, i.e. location of wind turbines (including turbine numbers) and all associated infrastructure including BESS and all associated infrastructure should be mapped at an appropriate scale.</li> <li>iii. All supporting onsite infrastructure such as concrete turbine foundations and turbines hard stands, on-site IPP substation, temporary and permanent laydown areas, overhead or underground cabling between the turbines, temporary staff accommodation areas, BESS area, access roads and internal gravel roads, fencing and lighting, telecommunication infrastructure area, stormwater channels, water pipelines, offices and operational control</li> </ul>	<ul style="list-style-type: none"> <li>i. Refer to Volume I for figures</li> <li>ii. Refer to Volume I – Figure 3</li> <li>iii. This will be produced prior to construction</li> <li>iv. Refer to Volume I – Figure 3</li> <li>v. Refer to Volume I – Figure 3</li> <li>vi. Refer to Volume I - Figures</li> <li>vii. Refer to Volume I – Figure 3</li> <li>viii. Refer to Volume I – Figure 3</li> <li>ix. Refer to Volume I – Figure 5 and 6.1 to 6.3</li> </ul>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>centre, operation and maintenance area / warehouse / workshop, ablution facility areas, and etc.</p> <ul style="list-style-type: none"> <li>iv. All necessary details regarding all locations and sizes of the substations and internal power lines.</li> <li>v. All necessary details regarding related to the proposed wind facility.</li> <li>vi. Turbines must be clearly numbered.</li> <li>vii. All existing infrastructure on the site, especially internal road infrastructure.</li> <li>viii. The maps should be provided in high resolution and be clear and legible. Ensure to use a definitive icon or colour which contrasts against the background information and colours of the maps provided</li> <li>ix. Please provide an environmental sensitivity map, if possible, which indicates the following:                             <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;</li> <li>• Sensitivity Buffer areas; and All “no-go” areas.</li> </ul> </li> </ul>	
	<p>b) It must be emphasised that the final EIAR must include a final layout map which adheres to specialist recommendations as well as the identified no-go areas and buffer zones. All turbines must be numbered on all submitted maps. Please include a separate appendix which contains all relevant mapping information.</p>	<p>Figure 6.1 -6.3 of the Draft EIA Report report includes a map combining the layout map superimposed (overlain) on the environmental sensitivity map.</p>
	<p>c) The above site-specific map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>	<p>Refer to Figure 7.1 and 7.2 in Volume I - Figures</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	d) Google maps will not be accepted for decision-making purposes. Ensure that distinct colours are Used on the maps to differentiate features, especially on the sensitivity map.	Google maps have been avoided in the EIA.
	e) Include a description of the process to determine the finalised layout i.e. specialist considerations, site sensitivities etc.	An evolution report has been included as appendix C.
	f) A cumulative map which shows the proposed wind farms linked to this application (i.e. Khoe WEF Application currently in process). The map should highlight the grid connections used and show if the WEFs will share any infrastructure.	Cumulative map has been included in Volume I - Figures
	g) 'Section 11.9.2 Visual Sensitivities' of the Final Scoping report highlights numerous visual sensitivities and their recommended buffers. The turbines occurring within these buffers must be either microsited as far as possible or motivated for. Include turbine numbers when providing these motivations to ensure ease of map reference.	The layout has been revised twice during the EIA phase to account for visual sensitive areas. However, according to the VIA turbines are still located in high sensitive areas. A motivation for the turbines still located in these high sensitive areas have been provided by the EAP in the EIA Report.
	<b>5. Public Participation Process</b>	
	a) Please ensure that all issues raised, and comments received from registered I&APs and organs of state which have jurisdiction are submitted to the Department with the EIAR. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning, the Department of Agriculture, Forestry and Fisheries (DAFF), the provincial Department of Agriculture, the South African Civil Aviation Authority (SACAA), the Department of Transport, the Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African	These have been included in Volume III – Comments and Response Report

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>National Roads Agency Limited (SANRAL), the South African Heritage Resources Agency (SAHRA), EWT, BirdLife SA, CapeNature, the Department of Mineral Resources, the Department of Rural Development and Land Reform, the Square Kilometre Array (SKA) and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation (BCAdmin@dffe.gov.za, for the attention of Mr Seoka Lekota) and Department of Forestry, Fisheries and the Environment: Protected Areas Management Effectiveness.</p>	
	<p>b) Please ensure that all issues raised and comments received during the circulation of the final SR from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the EIAR. Proof of correspondence with the various stakeholders must be included in the EIAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</p>	<p>Final scoping has been circulated however no comments were received during this period.</p>
	<p>c) The Public Participation Process must be conducted in terms Regulation 39, 40, 41, 42, 43 &amp; 44 of the NEMA EIA Regulations 2014, as amended.</p>	<p>This process has been conducted accordingly.</p>
	<p>d) A comments and response trail report (C&amp;R) must be submitted with the draft EIAR. The C&amp;R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully and in chronological order. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p>	<p>C&amp;R report has been included as Volume III</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	e) Please include the date of publishing and the names of the newspapers used in the EIAR.	Details of newspaper advertisements have been included in Section 9 of the Draft EIA Report
	6. Specialist Assessments	
	<ul style="list-style-type: none"> <li>• a. The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</li> <li>• A detailed description of the study’s methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.</li> <li>• Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.</li> <li>• Please note that the Department considers a ‘no-go’ area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the ‘no-go’ areas.</li> <li>• Should the specialist definition of ‘no-go’ area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the ‘no-go’ area’s buffer if applicable.</li> <li>• All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.</li> <li>• Should a specialist recommend specific mitigation measures, these must be clearly indicated.</li> <li>• Regarding cumulative impacts: Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</li> </ul>	<p>Please refer to Sections 10 – 12 and Volume II – Specialist studies.</p> <p>The EAP acknowledges that the departments definition of a ‘no-go’ area is for any infrastructure, including the associated infrastructure such as access roads. The proposed development, including the associated infrastructure is not proposed within no-go areas.</p> <p>The avifauna and bat specialist has identified areas of no-go for turbines. These areas are clearly defined and marked in the maps.</p> <p>All specialist studies are final and provide detailed / practical mitigation measures. Further studies are only provided for post construction of the proposed development.</p> <p>Specific mitigation measures as recommended by specialists are clearly indicated the EIAR and EMPr.</p> <p>No contradicting recommendations were provided by specialists. Specialists’ recommendations have been considered and included Section 13 of the EIAR to be included in EA and / or in the EMPr for implementation.</p> <p>An assessment of cumulative impacts, including significance ratings, has been included in Section 4.3.3 and Section 11 of the Draft EIA Report. The actual development footprint of the nearby</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<ul style="list-style-type: none"> <li>• A detailed process flow to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>• Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.</li> <li>• The significance rating must also inform the need and desirability of the proposed development.</li> <li>• A cumulative impact environmental statement on whether the proposed development must proceed.</li> <li>• Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</li> </ul>	<p>Renewable Energy developments could not be easily quantified or accessed spatially. For example, the National Renewable Energy EIA Application Database contains the land parcels, and not the footprint. Nonetheless, it is believed that the assessment of cumulative impacts has been adequately captured in this Draft EIA Report.</p> <p>Detailed process flow and proof of the assessments have been included in the individual independent specialist reports.</p> <p>The need and desirability of the proposed project takes into account the cumulative impacts of surrounding developments of the area.</p> <p>A statement of the cumulative impacts of the proposed development has been included in the report.</p> <p>No contradicting recommendations were provided by specialists. Specialists’ recommendations have been considered and included Section 13 of the EIAr to be included in EA and / or in the EMPr for implementation.</p>
	<p>b) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p>	<p>All specialist studies includes detailed description of their methodology, as well as the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p>
	<p>c) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p>	<p>Please refer to Section 2.5 in draft EIA report</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>No contradicting recommendations, apart from visual specialist. The locations of turbines within high sensitive areas are currently the best for wind resource potential and the removal of these will entirely jeopardize the project.</p>
	<p>e) It is further brought to your attention that Procedures 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, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.</p>	<p>The EAP is aware of the requirements of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998. Specialist assessments have been conducted in accordance with Government Notice No. 320 of 20 March 2020.</p>
	<p>f) Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.</p>	<p>Please refer to Section 4, table 4-1 of the Draft EIA Report</p>
	<p>g) The screening tool output:</p> <ul style="list-style-type: none"> <li>• The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</li> <li>• Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.</li> </ul>	<p>Please refer to Section 4, table 4-1 of the Draft EIA Report.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<ul style="list-style-type: none"> <li>It is the responsibility of the EAP to confirm the list of specialist assessments provided by the screening tool and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached. If the findings of the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.</li> </ul>	
	<p>h) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>	<p>Please refer to response above.</p>
	<p>i) If no wake effect assessment is to be included, please include a motivation thereof.</p>	<p>No wake effect assessment required, as there are currently no neighbouring wind farms within the project area (35 km).</p>
	<p>j) It is highly emphasised that specialist assessments are done in the correct season to ensure a comprehensive understanding of the environment.</p>	<p>Please refer to Volume II – Specialist Reports</p>
	<p>k) It is noted in the Comments and Responses report, Page xxix, that no offset is planned for the development. However, 'a research and stewardship programme to protect the riverine rabbit following the offset guidelines needs to be developed.' Further information must be provided once the specialist assessments provide deeper understanding into their distribution in the area.</p>	<p>Wording has been amended to align with terminology defined in the national offset guidelines. The restoration of modified habitat was the original intention, i.e, as part of the mitigation hierarchy. This would result in a low negative or positive residual impact and therefore no offsets as contemplated by the guidelines are considered applicable.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>I) A biodiversity offset investigation must be employed if the proposed development has RESIDUAL MEDIUM to HIGH impact i.e., after the mitigation hierarchy has been exhausted. Please consult the National Offset Guideline. The offset plan must include stakeholder engagement, definitive goals, timeframes, budget responsibilities and management requirements. It must also include a monitoring and reporting plan to assess the effectiveness of the offset. Any offset considerations must include</p> <p>Should an offset plan need to be compiled, note that a final offset plan must be submitted with the final EIAR.</p>	<p>The residual impact would not be medium or high after the mitigation hierarchy has been exhausted- it will be low or positive following rehabilitation</p>
	<p><b>7. Cumulative Assessment</b></p>	
	<p>Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> <li>i) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</li> <li>ii) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>iii) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>iv) A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>An assessment of cumulative impacts, including significance ratings, has been included in Section 4.3.3 and Section 11 of the Draft EIA Report. The actual development footprint of the nearby Renewable Energy developments could not be easily quantified or assessed spatially. For example, the National Renewable Energy EIA Application Database contains the land parcels, and not the footprint. Nonetheless, it is believed that the assessment of cumulative impacts has been adequately captured in this Draft EIA Report.</p> <p>Detailed process flow and proof of the assessments have been included in the individual independent specialist reports.</p> <p>The need and desirability of the proposed project takes into account the cumulative impacts of surrounding developments of the area.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		A statement of the cumulative impacts of the proposed development has been included in the report.
	<b>8. Environmental Management Programme</b>	
	<p>a) A final construction and operational phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAR.</p> <p>i. It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, must be signed and submitted with the final report over and above the EMPr for the facility.</p> <p>ii. Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the NEMA EIA Regulations, 2014, as amended.</p>	<p>a) A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures has been drafted and will be submitted with the EIAR.</p> <p>The generic EMPr for the development of a substation has been appended to the EMPr submitted with the Draft EIA Report.</p>
	<p>b) The EMPr must consider the following, and where possible, include:</p> <ul style="list-style-type: none"> <li>An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.</li> <li>A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a</li> </ul>	<p>The content of the EMPr produced for the proposed development is in compliance in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended, and includes, where relevant the plans and measures recommended by the Department.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</p> <ul style="list-style-type: none"> <li>• An avifauna monitoring and management plan to be implemented during the construction and operation of the facility. This plan must be drafted by a suitably qualified avifauna specialist.</li> <li>• A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must 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.</li> <li>• An open space management plan to be implemented during the construction and operation of the facility.</li> <li>• A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time -up areas so as not to disturb existing retail and commercial operations.</li> <li>• A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment.</li> <li>• A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.</li> <li>• A fire management plan to be implemented during the construction and operation of the facility.</li> <li>• An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion</li> </ul>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.</p> <ul style="list-style-type: none"> <li>• An effective monitoring system to detect any leakage or spillage of all 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.</li> <li>• Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</li> </ul>	
	<p>The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.</p>	<p>Contradicting recommendations were provided by specialists. Specialists' recommendations have been considered and included Section 13 of the Draft EIA Report to be included in EA and / or in the EMPr for implementation.</p>

## 2. TERMS OF REFERENCE

The primary objective of the S&EIA process is to present sufficient information to the competent authority (CA) and interested and affected parties (I&APs) on predicted potential impacts and associated mitigation measures required to avoid or mitigate potential negative impacts, as well as to improve or maximise the potential benefits of the development.

In terms of legal requirements, the NEMA EIA Regulations 2014, as amended, regulate and prescribe the content of the EIA Report and specify the type of supporting information that must accompany the submission of the report to the authorities. Table 2-1 shows how and where the legal requirements are addressed in this EIA Report. Section 9 of this EIA Report provides a summary of the Public Participation Process (PPP) and Volume III of this EIA Report includes all Public Participation undertaken to date. As comments were received these have been collated and included in this EIA Report.

As per the EIA Regulations 2014, as amended, 'the objective of the environmental impact assessment process is to, through a consultative process -

*(a) determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;*

*(b) describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the development footprint on the approved site as contemplated in the accepted scoping report;*

*(c) identify the location of the development footprint within the approved site as contemplated in the accepted scoping report based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;*

*(d) determine the:*

*(i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and*

*(ii) degree to which these impacts -*

*(aa) can be reversed;*

*(bb) may cause irreplaceable loss of resources, and*

*(cc) can be avoided, managed or mitigated;*

*(e) identify the most ideal location for the activity within the development footprint of the approved site as contemplated in the accepted scoping report based on the lowest level of environmental sensitivity identified during the assessment;*

*(f) identify, assess, and rank the impacts the activity will impose on the development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity;*

*(g) identify suitable measures to avoid, manage or mitigate identified impacts; and*

*(h) identify residual risks that need to be managed and monitored.'*

The above activities were completed through consultation with:

- The lead authority involved in the decision-making for the application (in this case, the DFFE);
- I&APs, provincial and local governments, and other relevant organisations to ensure that local issues are well understood; and
- The specialist team to ensure that technical issues are identified.

The existing environment within which a proposed development is to be located was investigated, through a review of relevant background literature and ground-truthing and any required long-term on-site monitoring.

The primary objective of the EIA is to present key stakeholders with the findings of the assessments, obtain and document feedback and address all issues raised.

**TABLE 2-1 LEGISLATIVE REQUIREMENTS FOR SCOPE OF ASSESSMENT AND CONTENT OF ENVIRONMENTAL IMPACT ASSESSMENT REPORTS**

<b>Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)</b>	<b>Location in EIA</b>
3 (1) <i>An environmental impact assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include-</i>	
(a) <i>details of- the EAP who prepared the report; and the expertise of the EAP, including a curriculum vitae;</i>	Section 2 Appendix A
(b) <i>the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including- the 21-digit Surveyor General code of each cadastral land parcel; where available, the physical address and farm name; where the required information in items (i) and (ii) is not available, the co-ordinates of the boundary of the property or properties;</i>	Executive Summary
(c) <i>a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is- a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or on land where the property has not been defined, the coordinates within which the activity is to be undertaken;</i>	Figure 3
(d) <i>a description of the scope of the proposed activity, including- all listed and specified activities triggered and being applied for; and a description of the associated structures and infrastructure related to the development;</i>	Section 3
(e) <i>a description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context;</i>	Section 3 and 5
(f) <i>a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred development footprint within the approved site as contemplated in the accepted scoping report;</i>	Section 5
(g) <i>a motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report;</i>	Section 8

Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)	Location in EIA
(h) a full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including:	
details of the development footprint alternatives considered;	Section 7
details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;	Section 9 Volume III
a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;	Section 9
the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Section 6
the impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated;	Section 10 and 11
the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;	Section 4 Volume II
positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Section 10 and 11
the possible mitigation measures that could be applied and level of residual risk;	Section 10 and 11
if no alternative development footprints were investigated, the motivation for not considering such; and	Section 7
a concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scoping report;	Section 8
(i) a full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred development footprint within the approved site as contemplated in the accepted scoping report through the life of the activity, including -	
a description of all environmental issues and risks that were identified during the environmental impact assessment process; and	Section 10
an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;	Section 10
(j) an assessment of each identified potentially significant impact and risk, including- cumulative impacts; the nature, significance and consequences of the impact and risk; the extent and duration of the impact and risk; the probability of the impact and risk occurring; the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreplaceable loss of resources; and the degree to which the impact and risk can be mitigated;	Section 11



<b>Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)</b>		<b>Location in EIA</b>
(k)	<i>where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report;</i>	Section 12
(l)	<i>an environmental impact statement which contains- a summary of the key findings of the environmental impact assessment; a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers; and a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;</i>	Section 12 and 13 Figure 7
(m)	<i>based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation;</i>	Section 12 and 13 Volume II
(n)	<i>the final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment;</i>	Section 8
(o)	<i>any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;</i>	Section 13
(p)	<i>a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;</i>	Section 2 Volume II
(q)	<i>a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;</i>	Section 13
(r)	<i>where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised;</i>	The proposed activity includes operational aspects.
(s)	<i>an undertaking under oath or affirmation by the EAP in relation to- the correctness of the information provided in the reports; the inclusion of comments and inputs from stakeholders and I&amp;APs; the inclusion of inputs and recommendations from the specialist reports where relevant; and any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties; and</i>	Appendix A
(t)	<i>where applicable, details of any financial provision for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts;</i>	n/a
(u)	<i>An indication of any deviation from the approved scoping report, including the plan of study, including- any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and a motivation for the deviation;</i>	n/a Specialist following the same methodology and protocols in the EIA phase. There are no deviations from the approved Plan of Study

Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)		Location in EIA
(v)	<i>any specific information that may be required by the competent authority; and</i>	Section 13
(w)	<i>any other matters required in terms of section 24(4)(a) and (b) of the Act.</i>	n/a
3 (2)	<i>Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to an environmental impact assessment report the requirements as indicated in such notice will apply.</i>	Volume II

## 2.1 STRUCTURE OF THE EIA REPORT

The EIA report is set out in three volumes:

- Volume I: EIA Report;
- Volume II: Specialist Reports; and
- Volume III: Public Participation Report (including Comments and Responses table).

## 2.2 DEVIATIONS FROM PLAN OF STUDY

There are no deviations from the approved PSEIA.

## 2.3 THE APPLICANT

The Project Applicant appointed ERM, with the lead EAP being Stephanie Gopaul to co-ordinate and manage the S&EIA application process. The appointed specialist team was based on the results of the DFFE Screening Tool Report generated.

TABLE 2-2 DETAILS OF THE APPLICANT

Name of the Applicant	FE Hugo & Khoe (Pty) Ltd		
Name of contact person for applicant (if other)	Mr Thomas Condesse		
Company Registration Number	K2022778660		
BBBEE status	n/a		
Physical address	15 Bridgeway Road, Bridgeways Precinct, Century City, Cape Town		
Postal address	15 Bridgeway Road, Bridgeways Precinct, Century City, Cape Town		
Postal code	7441	Cell:	+33 6 22 66 59 32
Telephone	-	Fax:	-
E-mail	Thomas.Condesse@energyteam.co.za/Deon.lottering@energyteam.co.za		

## 2.4 DETAILS OF THE EAP

The co-ordination and management of this environmental application process is being conducted by Environmental Resources Management Southern Africa (Pty) Ltd ('ERM) with the lead EAP

being Stephanie Gopaul (Table 2-3) Refer to Appendix A for the EAP's Declaration of Interest and Curriculum Vitae.

**TABLE 2-3 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER**

<b>Company of EAP</b>	<b>Environmental Resource Management Southern Africa (Pty) Ltd.</b>
EAP name and surname	Stephanie Gopaul
EAP Qualifications and Professional affiliations	Masters in Environmental Management, University of the Free State, South Africa, 2012 BSc. Environmental and Engineering Geology, University of KwaZulu Natal, South Africa, 2005
Physical address	Regus, Floor -3, 18 The Boulevard, Westway Office Park, Westville, Durban
Postal address	As above
Postal code	3629
Telephone	+27105963502
Cell phone	+27656660066
E-mail	stephanie.gopaul@erm.com / hugokhoe@erm.com

#### 2.4.1 THE S&EIA PROJECT TEAM

**TABLE 2-4 S&EIA PROJECT TEAM**

<b>Discipline</b>	<b>Specialist</b>	<b>Specialist Organisation</b>
EAP	Khosi Ngema	ERM (Pty) Ltd
Soil and Agricultural Potential	Johann Lanz	Independent Consultant
Avifauna	Dr Rob Simmons	Birds and Bats Unlimited
Bats	Stephanie C Dippenaar	EkoVler
Visual / Landscape	Lourens du Plessis	LOGIS
Heritage and Palaeontology	John Gribble	TerraMare Archaeology
Noise	Mornè De Jager	Enviro Acoustic Research
Socio-Economic	Tony Barbour	Independent Consultant
Traffic and Transportation	Victor de Abreu and Reabetswe Mokomele	SMEC
Terrestrial Biodiversity (Fauna and Flora)	Owen Davies	ERM
Freshwater and Wetlands (Aquatics)	Brian Colloty	EnviroSci

## 2.5 ASSUMPTIONS AND LIMITATIONS

### 2.5.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

There were no specific assumptions, uncertainties or gaps in knowledge or data that affected the findings of the study.

### 2.5.2 FRESHWATER AND WETLANDS

Obtaining comprehensive understanding of the dynamics of both the flora and fauna of communities within study sites, as well as the status of endemic, rare or threatened species in any study area, assessments should consider investigations at different time scales (across seasons/years) and through replication. Due to time constraints these long-term studies are not feasible and are thus mostly based on instantaneous sampling. This limitation is common to many impact assessment type studies, but the findings are deemed adequate for the purposes of decision-making, unless otherwise stated.

Due to the scope of the work for the assessment of the proposed development, a long-term investigation of the proposed site was not possible and not perceived as part of the Terms of Reference (ToR). A concerted effort was made to sample and assess as much of the potential site, as well as make use of any supporting literature, species distribution data and aerial photography.

Information presented by the specialist, which have been included in this EIA, only has reference to the study area as indicated on the accompanying maps and cannot be applied to any other area without detailed investigation.

### 2.5.3 TERRESTRIAL BIODIVERSITY

- The contents of this report relate to the proposed Khoe WEF and associated infrastructure.
- SCC are classified as Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT), Data Deficient (DD) and Rare.
- The identity of several plant SCC are withheld from this and subsequent reports due to the sensitivity of these species to illegal harvesting. These species are known by numerical identifiers (Sensitive Species 142, 207, 508, 521, 654, 1004) assigned by the SANBI. The identity of these species has been made available to the Specialist for consideration during the compilation of reports relevant to the study area.
- Previous studies used to compile online species distribution datasets used to supplement the species list for the proposed Khoe WEF and associated infrastructure PAOI are extremely limited and cannot be seen as fully representative of the diversity of plant species potentially on site.

### 2.5.4 FAUNAL

Inventory surveys of animal species occurring across a site are difficult to achieve within the time-frames associated with an EIA. To compile a comprehensive site-specific list would require extensive sampling. For assessment purposes, it is considered more important to identify species and processes of conservation value that may be impacted upon. Therefore, this assessment attempts to identify threatened and other significant species, important habitats, and ecological processes. Camera trap survey design was focused to meet the study objectives, and full species inventories were not the primary objective of this study, but rather

the confirmation of presence. A study<sup>4</sup> on the camera trapping of mammals in open scrubland suggested that reliable estimates of species richness can be achieved when cameras are spaced 1 x 1 km apart and left in the targeted area until a survey effort of 1000 days is realized. More elusive species may require between 1,600 and 3,000 camera trap days or a change in sampling intensity and number of deployment sites. The spatial and temporal deployment of the camera trap survey therefore unlikely resulted in a complete species inventory of the study area, however the 1,832 camera trap days was considered sufficient for the purposes of this study.

It is not possible to confirm the absence of a species with certainty, particularly rare or low-density species or species with short, not-fully understood activity windows (e.g. some insect species). If species were not detected, they were nonetheless assumed to be present for assessment purposes. Presence confirmation was considered more significant than absence. However, at locations where presence was confirmed, they were generally detected and recorded relatively soon after camera trap deployment and regularly thereafter throughout the deployment period. This indicates that they are relatively common within areas of suitable habitat, and it is considered unlikely that they were present at sites where they were not detected. Not all patches of suitable habitat were monitored, it is assumed that if e.g., a Riverine Rabbit (*Bunolagus monticularis*) was detected within a certain habitat type or patch, that the species is present throughout that habitat type or patch. Current distribution and habitat suitability models for Riverine Rabbit largely utilize abiotic factors and sighting records and are likely subject to refinement as research on this poorly understood species improves.

While independent image captures were determined through the exclusion of multiple images of the same individual taken during the same instance, independent captures may nevertheless represent the same individual taken at different times and therefore the number of independent captures does not indicate the population size at a location in this study.

### 2.5.5 FLORA

- The contents of this report relate to the proposed Khoe WEF and associated infrastructure.
- SCC are classified as Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT), Data Deficient (DD) and Rare.
- The identity of several plant- SCC are withheld from this- and subsequent reports due to the sensitivity of these species to illegal harvesting. These species are known by numerical identifiers (Sensitive Species 142, 207, 521, 654, 692, 871 and 1209) assigned by the SANBI. The identity of these species has been made available to the Specialist for consideration during the compilation of reports relevant to the study area.
- Previous studies used to compile online species distribution datasets used to augment the species list for the proposed Khoe WEF and associated infrastructure PAOI are extremely limited and cannot be seen as fully representative of the diversity of plant species potentially on site.
- Where online databases provided records of species that have several sub-species but provided no reference to which sub-species was recorded, it was assumed the sub-species was that with the greatest conservation importance.

<sup>4</sup> Colyn, R.B., Radloff, F.G.T. & O'Riain, M.J. Camera trapping mammals in the scrublands of the Cape Floristic Kingdom—the importance of effort, spacing and trap placement. *Biodivers. Conserv.* 27, 503–520 (2018). DOI: 10.1007/s10531-017-1448-z

### 2.5.6 AVIFAUNA

The SABAP2 national dataset is relatively sparse from this area with 47 full-protocol cards in the 29 pentads that cover the Khoe wind energy facility site and surrounds. These were only used in the modelling to give a historical perspective on overall species richness.

Any site visits to record birds, even over a 12-month period, may not provide a complete picture of all species likely to occur in an arid region. Rainfall is the chief limiting factor as it dictates if, and when, birds occur and whether they breed on site (Dean 2004, Seymour et al. 2015). While drought dominated southern Africa from 2014-2019, above average rainfall occurred and provided a boom period for avian species that may otherwise may not have occurred. Thus, the data presented represent a "worst case scenario" at a particularly species-rich moment.

The CRM analysis is a data hungry model that requires large data sets for each species to determine probabilities and give accurate risk assessments. Some species did not reach these thresholds – either because they were seldom recorded (Lanner Flacon) or because they were rarely recorded within the Blade Swept Area (Southern Black Korhaan), both Red Data species. While this means that no risk assessments can be determined, it also means that the risk for these species is likely to be very low simply because they were seldom recorded on site.

One of the most difficult variables to record is the flying height of a bird, and sources of error are expected. To minimise this, known height objects on site were used to assist with gauge height. For example, all wind energy facilities have weather masts (Met masts) varying from 80 m to 120 m to measure wind speeds. These and pylon towers (typically 38 m high for the 400kV or 765kV) transmission lines, also helps gauge the altitude at which birds are flying.

### 2.5.7 BATS

An EIA must fit into a range of legislative and commercial processes, which dictate the timeframes and budgets of the studies that inform the EIA process. A rigorous scientific study would by its nature take longer and cost more than is feasible in terms of an EIA specialist study. The legislated time period for pre-assessment bat monitoring is approximately 12-months. Ideally, data collected over three or four years would provide a more comprehensive and robust indication of bat presence and activity under a range of weather conditions. These limitations are recognised, and every step is taken to manage them to ensure a thorough study is undertaken, based on credible scientific approaches.

Although it is an internationally accepted way of presenting bat data, the use of bat monitoring detectors to measure the relative abundance of bat activity as 'low', 'medium', or 'high', has limitations. This element of subjectivity is due to the extent that the results are based on the specialist's experience in interpreting the data into a qualitative baseline assessment report. A 'cautious' approach should be considered concerning accepting bat numbers as absolute true data, and hence recent guidelines regarding bat monitoring recommend a 'standardised' approach and include statistical formulas and calculations. Examples of assumptions and limitations in monitoring methods are highlighted below.

The knowledge of certain aspects of South African bats, such as population size, spatial and temporal movement patterns (e.g. migration and flying heights), and how bats may be impacted by wind energy, is limited, as their behaviour differs when comparing with the same type of European or American bat species.

Data is extrapolated from recordings of bat calls over large areas, whereas acoustic monitoring only samples small areas of space. Furthermore, the sound recording of the bat echolocation could be influenced by the type and intensity of the call, the bat species, the detector system used, the orientation of the signal relative to the microphone, and other environmental conditions, such as weather conditions.

The accuracy of species identification is dependent on the calls used for proof of identity but can be influenced by variation in bat calls within species, and between different species, and the overlapping of species call parameters. Although species names are mentioned, true species identification can only really be conducted when handling the bat. Species are identified as those that are the most likely due to call parameters and distribution maps, but confirmation of species will only be possible during the post-construction phase if a bat carcass is collected.

Bat detectors record bat activity, but the sensors cannot distinguish between a single bat passing multiple times, which could lead to double counting or multiple bats of the same species passing the device once (Kunz et al. 2007). Therefore, if we discuss bat activity, it means that bats were active on-site. If we talk about high bat activity, one could nevertheless derive that there are many bats on the terrain. Comparative studies of bat activity from similar locations are used to verify baseline information. Due to the overlap of calls, it is not possible to provide an exact number of bats passing the recorder. Therefore, the number of bats passing is not an exact count, but as close as possible under the given circumstances, and within the limitations of the survey techniques.

Bats do not echolocate in a uniform, monotonous way. For example, when they go on a feeding frenzy, it is difficult to identify a species from the sound of a call. Sometimes a species could also echolocate at a frequency somewhat higher or lower than the normal identifiable frequency. These calls could then be nearer to the range of another species. For this study, bat calls from unidentifiable species were recorded as 'unclear'. These calls are identified as a bat, but uncertainty exists as to the species identification.

Weather stations were situated at 117 m, while the bat monitoring system with which the weather was correlated, was situated at 100 m. The ideal is that the weather monitor is at the system, but a 17 m difference should nevertheless provide a fairly accurate correlation.

It is not possible to search the entire site as well as the wider neighbouring terrain for bat roosts, as small roosts can be found in numerous rock crevices, aardvark holes, or under the bark of some trees. However, the site is walked through as thoroughly as possible, within the legislated time frames of a bat impact assessment, as discussed above, and any roosts or indication of bat presence discovered during ground-truthing are incorporated into the study.

Only a year of pre-construction bat monitoring is required by legislation in South Africa, but changing weather conditions result in sporadic changes in the bat situation with consequent higher insect activity, resulting in higher bat activity. Weather changes could therefore result in changes in bat activity and the region experienced exceptionally high rainfall during 2023. Bats might therefore be less active in the following years if rainfall is lower or within the normal range for the region.

### 2.5.8 NOISE

Ambient sound levels are cumulative effects of innumerable sounds generated at various instances both far and near. A high measurement does not equate to an area that is constantly

noisy. Low sound levels do not mean an area is always quiet. Sound levels are variable across seasons, time of day, dependent on faunal characteristics, vegetation present, and meteorological conditions. The Environmental Noise Impact Assessment (ENIA) (Volume II) provides a full list of assumptions and limitations related to the assessment of noise impacts.

### 2.5.9 SOCIO-ECONOMIC

It is assumed that the development site represents a technically suitable site for the establishment of the proposed WEF and associated infrastructure.

The strategic importance of promoting renewable and other forms of energy is supported by the national and provincial energy policies.

Legislation and policies reflect societal norms and values. The legislative and policy context therefore plays an important role in identifying and assessing the potential social impacts associated with a proposed development. In this regard, a key component of the SIA process is to assess the proposed development in terms of its fit with key planning and policy documents. As such, if the findings of the study indicate that the proposed development in its current format does not conform to the spatial principles and guidelines contained in the relevant legislation and planning documents, and there are no significant or unique opportunities created by the development, the development cannot be supported.

There are no limitations that have a material bearing on the SIA.

### 2.5.10 TRAFFIC AND TRANSPORTATION

The assessment has been prepared based on the information provided by the Client and the following assumptions, amongst others:

- It was assumed that the construction period will last approximately 2 years with a 5-day working week resulting in 480 working days over 24 months.
- Construction trips were estimated without a detailed construction schedule programme.
- For the assessment of cumulative impacts, a conservative approach was adopted by assuming that all wind energy facilities within 30 km currently approved, planned or proposed would be constructed concurrently.
- WTG components will be imported and transported with abnormal vehicles from the most feasible port of entry/harbour.
- Haulage will occur on surfaced national and provincial roads and existing site access gravel roads.
- Construction material and labour force will be sourced locally.



### 2.5.11 HERITAGE AND ARCHAEOLOGY

The TerraMare Archaeology was unable to reach all areas of the proposed WEF on account of heavy rain during the site visit. The area received 100 mm of rain in a single night (half of the average annual rainfall) which resulted in Ou Muur (Re 193) and Eendracht (Re 37) being cut off from the road and the WTGs in the eastern corner of the WEF being inaccessible. Elsewhere in the WEF area, although going was heavy, access was possible.

As indicated already, the archaeological survey was carried out at the surface only and any completely buried archaeological sites or material will have not been located or recorded.

Although we believe that most of the relevant archaeological assessments and HIAs from the area have been located and reviewed, it is acknowledged that some reports may not have been identified for review.

### 2.5.12 PALEONTOLOGY

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the quartzites, mudstones, sandstones, shales and sands are typical for the country and some might contain fossil plants, traces of bioturbation and invertebrate. The overlying soils and sands of the Quaternary period would not preserve fossils (Bamford, 2024).

### 2.5.13 VISUAL/LANDSCAPE

To prepare this report, LoGis utilised only the documents and information provided by ERM or any third parties directed to provide information and documents by ERM. LoGis has not consulted any other documents or information in relation to this report, except where otherwise indicated. The findings, recommendations and conclusions given in this report are based on the author's best scientific and professional knowledge, as well as, the available information.

This report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken. LoGis and its staff reserve the right to modify aspects of the report including the recommendations if and when new information may become available from on-going research or further work in this field, or pertaining to this investigation.

This assessment was undertaken during the planning stage of the project and is based on information available at that time. It is assumed that all information regarding the project details provided by ERM and the Applicant is correct and relevant to the proposed project. This Visual Impact Assessment and all associated mapping has been undertaken according to the worst-case scenario with the layout provided.

The findings, recommendations and conclusions given in this report are based on the author's best scientific and professional knowledge, as well as, the available information. This report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken. LOGIS reserve the right to modify aspects of the report including the recommendations if and when new information may become available from on-going research or further work in this field, or pertaining to this investigation.

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This assessment was undertaken during the planning stage of the project and is based on information available at that time.

This Visual Impact Assessment and all associated mapping has been undertaken according to the worst-case scenario.

### 3. ENVIRONMENTAL LEGAL FRAMEWORK

The proposed development requires environmental authorisation prior to being constructed and operated. This section of the report highlights the important environmental legal considerations taken while undertaking this S&EIA process.

#### 3.1 THE NATIONAL ENVIRONMENT MANAGEMENT ACT, 1998 (ACT NO 107 OF 1998)

Section 2 of the National Environment Management Act, 1998 (NEMA) as amended, lists environmental principles that are to be applied by all organs of state regarding developments that may significantly affect the environment. Included amongst the key principles is the principle that all developments must be socially, economically, and environmentally sustainable, and environmental management must place people and their needs at the forefront of its concern, to serve their physical, psychological, developmental, cultural and social interests equitably.

NEMA, as amended, also provides for the participation of potential and registered I&APs and it stipulates that decisions must take the interests, needs and values of all I&APs into account.

Chapter 5 of NEMA, as amended, outlines the general objectives and implementation of Integrated Environmental Management (IEM), the latter providing a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. Section 24 provides a framework for the granting of environmental authorisations.

To give effect to the general objectives of IEM, the potential impacts on the environment of listed activities must be considered, investigated, assessed, and reported to the competent authority. Section 24(4) outlines the minimum requirements for procedures for the investigation, assessment and communication of the potential impact of activities.

#### 3.2 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REGULATIONS, 2014 AS AMENDED

The EIA Regulations 2014 as amended by GNR 326 of 2017 provide for the control of certain Listed Activities. These activities are listed in Government Notice No. R327 (Listing Notice 1 – Basic Assessment), R325 (Listing Notice 2 – Scoping & EIA Process) and R324 (Listing Notice 3 – Basic Assessment) of 7 April 2017, and are prohibited to commence until environmental authorisation has been obtained from the competent authority, in this case, the Department of Forestry and Fisheries (DFFE).

The DFFE is the competent authority for all renewable energy proposals which will be bid into the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), as NEMA, as amended, states that:

*"24C. (2) The Minister must be identified as the competent authority in terms of subsection (1) if the activity- (a) has implications for international environmental commitments or Relations"*

It is the intention of the Project Applicant to bid on the Khoe WEF in the next bidding window of the REIPPPP with the aim of evacuating the generated power from the WEF into the National Eskom Grid.

Environmental authorisation, which may be granted subject to conditions, will only be considered upon compliance with GNR982, as amended by GNR326 of 7 April 2017.

Any Environmental Authorisation obtained from the DFFE applies only to those specific listed activities for which the application was made. To ensure that all Listed Activities that could potentially be applicable to this proposal are covered by the Environmental Authorisation, a precautionary approach is followed when identifying listed activities, that is, if an activity could potentially be part of the proposed development, it is listed.

The Listed Activities applicable to this proposed project are presented in Table 3-1 below. All potential impacts associated with these Listed Activities will be considered and adequately assessed in this authorisation process.

**TABLE 3-1 NEMA LISTED ACTIVITIES IN RELATION TO THE PROPOSED DEVELOPMENT**

Listing Notices 1, 2 and 3 07 April 2017	Listed Activity	Description of project activity that triggers listed activity
<b>Listing Notice 1 – GNR 327</b>		
Listing Notice 1 GN R 327 Activity 11(i)	<i>The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts;</i>	FE Hugo and Khoe propose to develop an on-site substation at the Khoe WEF location with a capacity of 132 kV to facilitate the connection to the national grid. The turbines will be connected to the on-site substation via cabling with a capacity of 33kv or more, the development footprint for the facility substation is located outside of an urban area.
Listing Notice 1 GN R 327 Activity 12(ii)(a)(c)	<i>The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; Where such development occurs— (a) within a watercourse; or (c) within 32 metres of a watercourse</i>	The WEF will require the establishment of infrastructure (including internal access roads) with a physical footprint exceeding 100m <sup>2</sup> within or within 32m of drainage features, ephemeral washes or streams present within the project site.
Listing Notice 1 GN R 327 Activity 14	<i>The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic meters or more but not exceeding 500 cubic meters.</i>	The development of the WEF will include the construction and operation of facilities and infrastructure for the storage and handling of dangerous goods (combustible and flammable liquids, such as oils, lubricants, solvents associated with the facility, and facility substation) where such storage will occur inside containers with a combined capacity exceeding 80 cubic meters but not exceeding 500 cubic meters. The volumes are not known at the time but will have a maximum combined capacity of 400 m <sup>3</sup> .
Listing Notice 1 GN R 327 Activity 19(i)	<i>The infilling or depositing of any material of more than 10 cubic meters into, or the dredging, excavation, removal or moving of soil, sand shells, shell grit, pebbles or rock of more than 10 cubic meters from a watercourse.</i>	Drainage features, ephemeral washes or streams are present within the project site. During the construction phase, more than 10 m <sup>3</sup> of rock will be removed from drainage features for the construction of the wind energy facility and associated infrastructure.

Listing Notices 1, 2 and 3 07 April 2017	Listed Activity	Description of project activity that triggers listed activity
Listing Notice 1 GN R 327 Activity 24(ii)	<i>The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8metres;</i>	The width of the internal access roads between the project components will be approximately 8m but may be up to 10m wide where required for the movement of the crane between turbine positions.
Listing Notice 1 GN R 327 Activity 28(ii)	<i>Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.</i>	The total area to be developed for the WEF (including the facilities substations) are greater than 1 ha and occurs outside an urban area and is currently used for agricultural purposes, mainly grazing. The WEF is located outside an urban area. The proposed development is approximately 85 ha.
Listing Notice 1 GN R 327 Activity 56(i)(ii)	<i>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre – (i) where the existing reserve is wider than 13,5 meters; or (ii) where no reserve exists, where the existing road is wider than 8 metres.</i>	Existing farm roads within the project site will be widened to up to 8 m and/or lengthened by more than 1 km to accommodate the movement of heavy vehicles and cable trenching activities.
<b>Listing Notice 2 – GNR 325</b>		
Listing Notice 2 GN R 325 Activity 1	<i>The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.</i>	The Khoe WEF is anticipated to have an electricity capacity of up to 232 MW.
Listing Notice 2 GN R 325 Activity 15	<i>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) the undertaking of a linear activity</i>	The total for the Khoe WEF is ~4,113 ha, with a development footprint of ~ 85 ha. The project is proposed on a property where the predominant land use is grazing and comprises of indigenous vegetation. It is therefore anticipated that over 20 ha of indigenous vegetation will be cleared as a result of the development.
<b>Listing Notice 3 – GNR 324</b>		
Listing Notice 3 GN R 324 Activity 4(i)(ii)(aa)	<i>The development of a road wider than 4 metres with a reserve less than 13,5 metres (i) in the Western Cape, (ii) outside urban areas (aa) within areas containing indigenous vegetation</i>	Existing roads on the affected properties will be used where feasible and practical. The width of the main access roads at the access points will be up to 8 m. The WEF will have internal access roads of up to 4.5 m wide, with a servitude of up to 13.5 m, 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 on-

Listing Notices 1, 2 and 3 07 April 2017	Listed Activity	Description of project activity that triggers listed activity
		<p>site substation hub (which includes substation infrastructure, BESS and Balance of Plant area).</p> <p>The project site is located within the Western Cape Province, outside of an urban area and on land containing indigenous vegetation.</p>
Listing Notice 3 GN R 324 Activity 18(i)(ii)(aa)	<p><i>The widening of a road by more than four (4) meters, or the lengthening of a road by more than one (1) kilometre within</i></p> <p><i>(i) the Western Cape, and in</i></p> <p><i>(ii) Areas on the watercourse side of the development setback line or within 100 metres from the edge of a watercourse where no such setback line has been determined;</i></p> <p><i>(aa) Areas containing indigenous vegetation.</i></p>	<p>Existing farm roads within the project site will be widened to up to 10 m. The project site is located in the Western Cape, outside of an urban area, on land containing indigenous vegetation and within 100 m of the edge of a watercourse.</p>

### 3.3 THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT NO 25 OF 1999 - NHRA)

Section 38 (1) of the National Heritage Resources Act, 1999 (NHRA) lists development activities that would require authorisation by the responsible heritage resources authority. Activities considered applicable to the proposed project include the following:

“(a) The construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;

(c) any development or other activity which will change the character of a site; and (i) exceeding 5,000 m<sup>2</sup> in extent.”

The NHRA, 1999, requires that a person intending to undertake such an activity must notify the relevant national and provincial heritage authorities at the earliest stages of initiating such a development. The relevant heritage authority would then in turn, notify the person whether a Heritage Impact Assessment Report should be submitted. According to Section 38(8) of the NHRA, 1999, a separate report would not be necessary if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act, 1989 (No. 73 of 1989) (ECA) (now replaced by NEMA, Act 107 of 1998) or any other applicable legislation. The decision-making authority must ensure that the heritage evaluation fulfils the requirements of the NHRA, 1999, and take into account any comments and recommendations made by the relevant heritage resources authority.

The Notice of Intent to Develop (NID), was submitted to Heritage Western Cape (HWC) on 24 November 2023.

In South Africa, the law is directed towards the protection of human-made heritage, although places and objects of scientific importance are covered. The NHRA, 1999, also protects intangible heritage such as traditional activities, oral histories, and places where significant

events happened. While not specifically mentioned in the NHRA, scenic routes are recognised as a category of heritage resources which requires grading as the Act protects areas of aesthetic significance.

The heritage and paleontology impact assessment reports has been submitted to HWC for comment on 21 August 2024.

### 3.4 NATIONAL DEPARTMENT OF AGRICULTURE, LAND REFORM AND RURAL DEVELOPMENT (DALRRD)

A renewable energy facility requires approval from the National Department of Agriculture, Land Reform and Rural Development (DALRRD) if the facility is on agriculturally zoned land. A No Objection Letter for the change in land use is required. This letter is one of the requirements for receiving municipal rezoning. This application requires motivation backed by good evidence that the development is acceptable in terms of its impact on the agricultural production potential of the development site. This process is separate from the S&EIA process and should not affect the EA decision.

### 3.5 SUBDIVISION OF AGRICULTURAL LAND ACT, 1970 (ACT NO. 70 OF 1970 - SALA)

In terms of the Subdivision of Agricultural Land Act, 1970, any application for change of land use must be approved by the Minister of Agriculture. This is a consent for long-term lease in terms of the SALA. If DALRRD approval for the development has already been obtained in the form of the No Objection letter, then SALA approval should not present any difficulties. Note that SALA approval is not required if the lease is over the entire farm portion. SALA approval (if required) can only be applied for once the Municipal Rezoning Certificate and Environmental Authorisation has been obtained.

### 3.6 CONSERVATION OF AGRICULTURAL RESOURCES, 1983 (ACT NO. 43 OF 1983)

The Conservation of Agricultural Resources Act (CARA), 1983 states that no degradation of natural land is permitted. The Act requires the protection of land against soil erosion and the prevention of water logging and salinization of soils by means of suitable soil conservation works to be constructed and maintained. The utilisation of marshes, water sponges and watercourses are also addressed.

Rehabilitation after disturbance to agricultural land is managed by the CARA. A consent in terms of CARA is required for the cultivation of virgin land. Cultivation is defined in CARA as "any act by means of which the topsoil is disturbed mechanically". The purpose of this consent for the cultivation of virgin land is to ensure that only land that is suitable as arable land is cultivated. Therefore, despite the above definition of cultivation, disturbance to the topsoil that results from the construction of a renewable energy facility and its associated infrastructure does not constitute cultivation as it is understood in CARA. This has been corroborated by Anneliza Collett (Acting Scientific Manager: Natural Resources Inventories and Assessments in the Directorate: Land and Soil Management of the Department of Agriculture, Land Reform and Rural Development (DALRRD)). The construction and operation of the facility will therefore not require consent from the Department of Agriculture, Land Reform and Rural Development in terms of this provision of CARA.

### 3.7 NATIONAL VELD AND FOREST FIRE ACT, 1998 (ACT NO. 101 OF 1998)

The purpose of the National Veld and Forest Fire Act, as amended by the National Fire Laws Amendment Act (Act 12 of 2001), is to prevent and combat veld, forest, and mountain fires throughout South Africa. The Act applies to the open countryside beyond the urban limit and puts in place a range of requirements. It also specifies the responsibilities of landowners. The term 'owners' includes lessees, people in control of land, the executive body of a community, the manager of State land, and the chief executive officer of any local authority. The requirements include, but are not limited to, the maintenance of firebreaks and availability of firefighting equipment to reasonably prevent the spread of fires to neighbouring properties.

### 3.8 THE ENVIRONMENT CONSERVATION ACT, 1989 (ACT NO.73 OF 1989), THE NATIONAL NOISE CONTROL REGULATIONS: GN R154 OF 1992

The Environment Conservation Act, 1989 (ECA) allows the Minister of Environmental Affairs and Tourism (now the "Minister of Forestry, Fisheries and the Environment") to make regulations regarding noise, amongst other concerns. The Minister has made noise control regulations under the ECA.

In terms of section 25 of the ECA, the national noise-control regulations (NCR) were promulgated (GN R154 in *Government Gazette* No. 13717 dated 10 January 1992). The NCRs were revised under Government Notice Number R. 55 of 14 January 1994 to make it obligatory for all authorities to apply the regulations.

Subsequently, in terms of Schedule 5 of the Constitution of South Africa of 1996 legislative responsibility for administering the NCR was devolved to provincial and local authorities.

These regulations define "**disturbing noise**" as:

*"Noise level which exceeds the zone sound level or, if no zone sound level has been designated, a noise level which exceeds the ambient sound level at the same measuring point by 7 dBA or more".*

These Regulations prohibit anyone from causing a disturbing noise. The Noise Assessment will take these Regulations into consideration when identifying and assessing the potential noise impacts associated with the proposed development.

### 3.9 NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER (2011)

Climate change is already a measurable reality and along with other developing countries, South Africa is especially vulnerable to its impacts. This White Paper presents the South African Government's vision for an effective climate change response and the long-term, just transition to a climate-resilient and lower-carbon economy and society. South Africa's response to climate change has two objectives:

- Effectively manage inevitable climate change impacts through interventions that build and sustain South Africa's social, economic and environmental resilience and emergency response capacity.
- Make a fair contribution to the global effort to stabilise greenhouse gas (GHG) concentrations in the atmosphere at a level that avoids dangerous anthropogenic



interference with the climate system within a timeframe that enables economic, social and environmental development to proceed in a sustainable manner.

### 3.10 WESTERN CAPE CLIMATE CHANGE RESPONSE STRATEGY: VISION 2050 (2022)

Globally, climate change is being recognised as an Emergency, with immediate systems change required to achieve significant emissions reductions by 2030 and maintain a habitable planet for all, whilst adjusting to the spreading impacts of climate change. The Western Cape has already started to experience the impacts of climate change and these are undermining our social and economic development gains. An accelerated response is required to address the threats and opportunities posed by climate change across the spectrum of the sectors of the region and the Western Cape Government. This Strategy guides the bold shifts required by 2030 to ensure we both meet our emissions reductions targets and create social, ecological and economic resilience in the face of climate destabilisation through the course of the next three decades up to 2050.

The Western Cape Climate Change Response Strategy: Vision 2050 (WCCCRS) describes a climate future that the Western Cape province will strive towards. It is centered on a Vision and four Guiding Objectives defining the direction of climate change response action for the region, with corresponding targets and actions.

### 3.11 NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004)

Section 34 of the Air Quality Act, 2004 (AQA) makes provision for:

- (1) The Minister to prescribe essential national noise standards –
  - a. For the control of noise, either in general or by specified machinery or activities or in specified places or areas; or
  - b. For determining –
    - i. a definition of noise; and
    - ii. the maximum levels of noise.
- (2) When controlling noise, the provincial and local spheres of government are bound by any prescribed national standards.

This section of the Act is in force, but no such standards have yet been promulgated.

An atmospheric emission license issued in terms of Section 22 may contain conditions in respect of noise. This, however, will not be relevant to this proposed development.

#### 3.11.1 NATIONAL DUST CONTROL REGULATIONS, 2013

The National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), makes provision for national dust control regulations. These regulations prescribe dust fall standards for residential and non-residential areas. These Regulations also provide for dust monitoring, control, and reporting.

The acceptable dust fall out rates are:

Restriction Area	Dust Fall (D) (mg/m <sup>2</sup> /day, 30 day average)	Permitted Frequency of exceedance
Residential	D<600	Two within a year, not sequential months
Non-Residential	600 <D< 1200	Two within a year, not sequential months

These rates are to be adhered to by the developer during the life of the project.

### 3.12 NATIONAL WATER ACT, 1998 (ACT NO. 36 OF 1998 - NWA)

The National Water Act, 1998 (NWA) provides for constitutional requirements including pollution prevention, ecological and resource conservation and sustainable utilisation. In terms of this Act, all water resources are the property of the State.

A water resource includes any watercourse, surface water, estuary or aquifer, and, where relevant, its bed and banks. A watercourse is interpreted as a river or spring; a natural channel in which water flows regularly or intermittently; a wetland lake or dam into which or from which water flows; and any collection of water that the Minister may declare to be a watercourse.

Relevant water uses for the proposed construction of the WEF which will require access roads over watercourses and drainage channels and boreholes for construction water, in terms of Section 21 of the Act include but are not limited to the following:

*Section 21 (a):* Abstraction of water from boreholes and rivers or dams;

*Section 21 (b):* Storage of water (dams or reservoirs);

*Section 21 (c):* Impeding or diverting the flow of water in a watercourse;

*Section 21 (i):* Altering the bed, banks, course or characteristics of a watercourse; and

*Section 21 (g):* Storage of domestic waste in conservancy tanks.

GN 1199 of 18 December 2009 grants general authorisation (GA) for the above water uses based on certain conditions. It also stipulates that these water uses must be registered with the responsible authority.

Pollution of river water is a contravention of the NWA. Chapter 3, Part 4 of the NWA deals with pollution prevention and in particular the situation where pollution of a water resource occurs or might occur as a result of activities on land. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent pollution of water resources.

Chapter 3, Part 5 of the NWA deals with pollution of water resources following an emergency incident, such as an accident involving the spilling of a harmful substance that finds or may find its way into a water resource. The responsibility for remedying the situation rests with the person responsible for the incident or the substance involved.

#### 3.12.1 PERMIT REQUIREMENTS

A Water Use License Application (WULA) or a General Application (GA) may be required. This will be determined by the Department of Water and Sanitation (DWS) during the WULA pre-application process.

This process will run separate to this EA application process.

### 3.13 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004 (ACT NO. 10 OF 2004 - NEMBA)

#### 3.13.1 THREATENED OR PROTECTED SPECIES LIST, 2015

Amendments to the Threatened or Protected Species (TOPS) list were published on 31 March 2015 in Government Gazette No. 38600 and Notice 256 of 2015. Certain flora and fauna that occur on the site may be threatened or protected.

#### 3.13.2 ALIEN AND INVASIVE SPECIES REGULATIONS, 2016

The Act and Regulations set out various degrees of Invasive Species (Plants, Insects, Birds, Animals, Fish and Water Plants) and requires that certain of those invasive species are documented and, in some cases, removed from properties in South Africa.

**The Regulations list 4 categories of invasive species** that must be managed, controlled, or eradicated from areas where they may cause harm to the environment, or that are prohibited to be brought into South Africa. A Terrestrial Ecology Assessment will be conducted as part of this S&EIA process to identify as well as propose ways in which to manage alien invasive species found at the proposed site area.

### 3.14 WESTERN CAPE BIODIVERSITY ACT (WCBA, ACT 6 OF 2021)

The WCBA and its implementation through regulations will enable a transformed biodiversity economy focusing on enabling access to critical resources in an equitable and sustainable manner.

The WC Biodiversity Act sets out a best practice model for the governance of public entities. This will further enable CapeNature's successes and ability to pursue the multiple objectives of protection and management of the world-renowned biodiversity and ensure that protected areas enable economic opportunities in local rural economies.

### 3.15 NATIONAL FORESTS ACT, 1998 (ACT NO. 84 OF 1998 - NFA)

This act lists protected tree species and prohibits certain activities. The prohibitions provide that *"no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister"*.

Any protected tree species recorded within the proposed site area shall be managed in accordance with the NFA as relevant.

### 3.16 ASTRONOMY GEOGRAPHIC ADVANTAGE ACT, 2007 (ACT. 21 OF 2007)

The Act provides for the preservation and protection of areas within the Republic that are uniquely suited for optical and radio astronomy. The Square Kilometre Array radio telescope is located in the declared Karoo Central Advantage Array and as such it is protected against harmful interference from wireless communication and electromagnetic emissions from electrical equipment.

According to the DFFE Screening Tool, there were no Weather Radar installations within a 60km radius.

### 3.17 NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996) (NRTA)

The technical recommendations for highways (TRH 11): "*Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads*" outline the rules and conditions which apply to the transport of abnormal loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.

Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges, and culverts.

The general conditions, limitations, and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution, and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.

The South African National Roads Authority (SANRAL) and the Provincial Department of Transport would act as a Competent/Commenting Authority as a result of the proposed road infrastructure associated with the Khoe WEF.

### 3.18 CIVIL AVIATION ACT, 2009 (ACT NO. 13 OF 2009) (CAA)

The Civil Aviation Act, 2009 (Act No. 13 of 2009) (CAA), governs civil aviation in the Republic. The Act provides for the establishment of a stand-alone authority mandated with the controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. This mandate is fulfilled by the South African Civil Aviation Authority (SACAA), an agency of the Department of Transport (DoT).

The SACAA achieves the objectives of the Act by complying with the Standard and Recommended Practices (SARPs) of the International Civil Aviation Organisation (ICAO), while considering the local context when issuing the South African Civil Aviation Regulations (SA CARs). All proposed developments or activities in South Africa that potentially could affect civil aviation must be assessed by SACAA in terms of the CARs and the South African Civil Aviation Technical Standards (SA CATs), in order to ensure civil aviation safety.

The SACAA and Air Traffic Navigation Services (ATNS) has been included as a stakeholder and will continue to be provided with an opportunity to comment on the application during the public participation process.

### 3.19 PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2002) (PAIA)

The PAIA gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights; and to provide for matters connected therewith.

The PAIA has and will be adhered to during all stakeholder engagement activities undertaken as part of this S&EIA process.

### 3.20 NATIONAL ENVIRONMENTAL MANAGEMENT ACT: NATIONAL APPEALS REGULATIONS, 2014

The purpose of these regulations is to regulate the procedure contemplated in section 43(4) of the National environmental management act relating to the submission, processing and consideration of a decision on an appeal. This Act is used to help guide and understand the appeal process and the procedures may follow.

#### 3.21 ADDITIONAL RELEVANT LEGISLATION

The applicant must also comply with the provisions of other relevant national legislation. Additional relevant legislation that has informed the scope and content of this S&EIA Report includes the following:

- Constitution of the Republic of South Africa, 1996 (Act No. 108, 1996);
- Aviation Act, 1962 (Act No. 74, 1962);
- National Environmental Management: Waste Act, 2008 (Act No. 59, 2008);
- National Environmental Management: Protected Areas Act, 2003 (Act No. 57, 2003);
- National Roads Act, 1998 (Act No. 7, 1998)
- Occupational Health and Safety Act, 1993 (Act No. 85 of 1993);
- National Veld and Forest Fire Bill of 10 July 1998;
- Fertiliser, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947);
- Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002); and
- Independent Communications Authority of South Africa Act, 2000 (Act No. 13 of 2000; as amended); and
- Screening Report referred to in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended.

#### 3.22 CONVENTIONS AND TREATIES

##### 3.22.1 THE PARIS AGREEMENT (2016)

South Africa is one of 195 countries that are signatory to The Paris Agreement. The Paris Agreement is a legally binding instrument within the United Nations Framework Convention on Climate Change (UNFCCC) that provides guidance for action on climate change, focusing on sustainable development and poverty eradication. It sets the goal of preventing increase in global average temperature to below 2 degrees Celsius and pursuing efforts to limit global temperature increase to 1.5 degrees Celsius. Previous Minister of the DFFE, Ms Edna Molewa, signed the Paris Agreement on Climate Change on behalf of South Africa on 22 April 2016.<sup>5</sup>

The proposed WEF fits the emission reduction targets of the Paris Agreement and its aim of sustainable development.

<sup>5</sup>[https://www.environment.gov.za/mediarelease/southafrica\\_ratifies\\_parisagreement](https://www.environment.gov.za/mediarelease/southafrica_ratifies_parisagreement) (accessed on 24 January 2019).

### 3.23 THE CONVENTION ON BIOLOGICAL DIVERSITY (CBD) (1993)

This is a multilateral treaty for the international conservation of biodiversity, the sustainable use of its components and fair and equitable sharing of benefits arising from natural resources. Signatories have the sovereign right to exploit their own resources pursuant to their own environmental policies, and the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction. South Africa became a signatory to the CBD in 1993, which was ratified in 1995.

The convention prescribes that signatories identify components of biological diversity important for conservation and monitor these components in light of any activities that have been identified which are likely to have adverse impacts on biodiversity. The CBD is based on the precautionary principle which states that where there is a threat of significant reduction or loss of biological diversity, lack of full scientific certainty should not be used as a reason for postponing measures to avoid or minimise such a threat and that in the absence of scientific consensus the burden of proof that the action or policy is not harmful falls on those proposing or taking the action.

#### 3.23.1 THE RAMSAR CONVENTION (1971)

The Convention on Wetlands, called the Ramsar Convention, as it was adopted in the Iranian city of Ramsar in 1971 and came into force in 1975, is an intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. Under the three pillars of the convention the Contracting Parties commit to work towards the wise use of all their wetlands through national plans, policies and legislation, management actions and public education; designate suitable wetlands for their list of Wetlands of International Importance (the "Ramsar List") and ensure their effective management; and Cooperate internationally on transboundary wetlands, shared wetland systems, shared species, and development projects that may affect wetlands.

#### 3.23.2 THE CONVENTION ON THE CONSERVATION OF MIGRATORY SPECIES OF WILD ANIMALS (CMS OR BONN CONVENTION) (1983)

An intergovernmental treaty, concluded under the sponsorship of the United Nations Environment Programme, concerned with the conservation of wildlife and habitats on a global scale. The fundamental principles listed in Article II of this treaty state that signatories acknowledge the importance of migratory species being conserved and agree to take action to this end *"whenever possible and appropriate", "paying special attention to migratory species the conservation status of which is unfavourable and taking individually or in cooperation appropriate and necessary steps to conserve such species and their habitat"*.

#### 3.23.3 THE AGREEMENT ON THE CONSERVATION OF AFRICAN-EURASIAN MIGRATORY WATERBIRDS (AEWA) (1999)

An intergovernmental treaty developed under the framework of the Convention on Migratory Species (CMS), concerned with the coordinated conservation and management of migratory waterbirds throughout their entire migratory range. Signatories of the Agreement have expressed their commitment to work towards the conservation and sustainable management of migratory waterbirds, paying special attention to endangered species as well as to those with an unfavourable conservation status. The assessment of the ecology and identification of sites and

habitats for migratory waterbirds is required to coordinate efforts that ensure that networks of suitable habitats are maintained and investigate problems likely posed by human activities.

### 3.24 POLICIES AND GUIDELINES

#### 3.24.1 ENVIRONMENTAL IMPACT ASSESSMENT GUIDELINES

Relevant guidelines and policies as applicable to the management of the S&EIA process and to this application have also been taken into account, as indicated below:

- IEM Guideline Series (Series 3): Stakeholder engagement (2002);
- IEM Guideline Series (Series 4): Specialist studies (2002);
- IEM Guideline Series (Series 5): Impact Significance (2002);
- IEM Guideline Series (Guideline 5): Companion to the EIA Regulations 2010 (October 2012);
- IEM Guideline Series (Series 7): Cumulative Effects Assessment (2002);
- IEM Guideline Series (Guideline 7): Public Participation in the EIA process (October 2012);
- IEM Guideline Series (Series 7): Alternatives in the EIA process (2002);
- IEM Guideline Series (Guideline 9): Draft guideline on need and desirability in terms of the EIA Regulations 2010 (October 2012);
- DEA (2017) Guideline on Need and Desirability, Department of Environmental Affairs (DEA) Pretoria, South Africa (2017);
- IEM Guideline Series (Series 12): Environmental Management Plans (EMP) (2002); and
- IEM Guideline Series (Series 15): Environmental impact reporting (2002).

#### 3.24.2 THE EQUATOR PRINCIPLES (EPS) III, 2013

The principles applicable to the project are likely to include:

- Principle 2: Environmental and Social Assessment;
- Principle 3: Applicable Environmental and Social Standards;
- Principle 4: Environmental and Social Management System and Equator Principles Action Plan;
- Principle 5: Stakeholder Engagement;
- Principle 6: Grievance Mechanism;
- Principle 7: Independent Review;
- Principle 8: Covenants;
- Principle 9: Independent Monitoring and Reporting; and
- Principle 10: Reporting and Transparency.

These principles, among various requirements, include a requirement for an assessment process and an Environmental and Social Management Plan (ESMP) to be prepared by the client to address issues raised in the assessment process and incorporate actions required to comply with the applicable standards, and the appointment of an independent environmental expert to verify monitoring information.

### 3.24.3 SOUTH AFRICAN WIND ENERGY FACILITY GUIDELINES

The following guidelines are relevant to the proposed WEF and the potential impacts they may have on bats/avifauna and habitat that support bats/avifauna:

- South African Best Practice Guidelines for Pre-Construction Monitoring of Bats at Wind Energy Facilities. 5th Edition. 2020;
- South African Best Practice Guidelines for Operational Monitoring of Bats at Wind Energy Facilities. 5th Edition. 2020;
- South African Bat Fatality Threshold Guidelines. Edition 2. 2018;
- The Species Environmental Assessment Guideline (SANBI, 2020);
- Best-Practice Guidelines for assessing and monitoring the impact of wind-energy facilities on birds in southern Africa. Third Edition, 2015;
- Best Practice Guidelines for Verreaux's Eagle and Wind Energy (BirdLife South Africa, 2017), and the more recent draft update of these: Verreaux's Eagles and Wind Farms (BirdLife South Africa, 2021);
- The Southern African Bird Atlas Project 2 data, available at the pentad level (<http://sabap2.adu.org.za/v1/index.php>) (accessed at [www.mybirdpatch.adu.org.za](http://www.mybirdpatch.adu.org.za));
- IUCN 2021. The IUCN List of Threatened Species. 2021 - 3. <http://www.iucnredlist.org/>;
- Wind Energy Impacts on Birds in South Africa: A Preliminary review of the results of operational monitoring at the first wind farms of the Renewable Energy Independent Power Producer Procurement Programme in South Africa. BLSA. Occasional Report Series: 2;
- On a collision course: the large diversity of birds killed by wind farms in South Africa (Perold et al. 2020);
- Birds & Renewable Energy. Update for 2019. BirdLife South Africa. Birds and Renewable Energy Forum, 10 October 2019; and
- Avian Wind Farm Sensitivity Map. Birdlife South Africa. <http://www.birdlife.org.za/conservation/birds-and-wind-energy/windmap>.

### 3.24.4 INTERNATIONAL FINANCE CORPORATION (IFC) PERFORMANCE STANDARDS

The IFC's Performance Standards on Social and Environmental Sustainability (Referred to as Performance Standards hereinafter) is an environmental and social risk management tool provided by the IFC for its investment and financing clients and is also one of the major applicable standards of the Equator Principles. As the global influence of the Equator Principles has continued to rise, more and more Equator Principles Financial Institutions (EPFI) have been applying the Performance Standards in their assessments of environmental and social impacts. Under this backdrop, the Performance Standards have become the world's leading system and tool for environmental and social risk management.

The IFC Performance Standards encompass eight topics as described in Table 3-2 below. Given that South Africa has a complex and well-balance environmental regulatory system, the IFC Performance Standards are wholly addressed in the NEMA, 1998, as amended, framework.

For reference purposes the Project Applicant, will be referred to as the 'Borrower' in Table 3-2.



The project will not have adverse impacts on PS5: Land Acquisition and Involuntary Resettlement and PS7: Indigenous Peoples as there is no displacement or resettlement, and none such indigenous people are found in the proposed development area of influence.

**TABLE 3-2 DESCRIPTION OF THE IFC PERFORMANCE STANDARDS**

PS Description	Project Applicability
<p><b>Performance Standard 1:</b> Assessment and Management of Environmental and Social (E&amp;S) Risks and Impacts  <b>Objective:</b> Underscores the importance of identifying E&amp;S risks and impacts and managing E&amp;S performance throughout the life of a project.</p>	<p>Borrowers are required to manage the environmental and social performance of their business activity, which should also involve communication between the Borrower/Investee, its workers and the local communities directly affected by the business activity. This requires the development of a good management system, appropriate to the size and nature of the business activity, to promote sound and sustainable environmental and social performance as well as lead to improved financial outcomes.</p> <p>Section 2 of Chapter 1 of the NEMA, as amended, provides details of the environmental management principles that should be adhered to during the entire project life. Chapter 6 of the NEMA EIA Regulations, 2014 (as amended) outlines the requirements for Public Participation in respect of a project. This document represents the S&amp;EIA process (equitable to an ESIA) undertaken for the proposed development, and comprehensively assesses the key environmental and social impacts and complies with the requirements of the NEMA EIA Regulations, 2014 (as amended). The proposed development will be managed in terms of environmental and social impacts through an approved Environmental Management Programme (EMPr) which is drafted as part of the EIA process. The following have been included as part of this Assessment:            Description of relevant Policy;            Identification of Risks and Impacts;            EMPr (included in the EIA phase);            Requirements for Monitoring and Review;            Stakeholder Engagement as part of PPP;            External Communication and Grievance Mechanism;            and            Recommendation for ongoing Reporting to Affected Communities.</p>
<p><b>Performance Standard 2:</b> Labour and Working Conditions  <b>Objective:</b> Recognizes that the pursuit of economic growth through employment creation and income generation should be balanced with protection of basic rights for workers.</p>	<p>For any business, its workforce is a valuable asset, and a sound worker-management relationship is a key component of the overall success of the enterprise. By protecting the basic rights of workers, treating workers fairly and providing them with safe and healthy working conditions, Borrowers can enhance the efficiency and productivity of their operations and strengthen worker commitment and retention.</p> <p>Whilst PS 2 is applicable to the proposed development, it will not be addressed in detail in this report as Labour and Working conditions are typically addressed prior to construction, once EA has been awarded. Recommendations are provided concerning development of a detailed Human Resources (HR) and Occupational Health and Safety (OHS) system by the Applicant. In terms of the proposed development, construction will require the appointment of an EPC contractor (and others) for completion. Appointment of contactors and employees will be 'fair and equal', and workers will be provided with a safe, healthy and inclusive work environment. The EMPr will incorporate the requirements for compliance with local and international Labour and Working legislation and good practice on the part of the contractors.</p>
<p><b>Performance Standard 3:</b> Resource Efficiency and Pollution Prevention  <b>Objective:</b> Recognizes that increased industrial activity and urbanization often generate higher levels of air, water and land pollution, and that there are efficiency opportunities.</p>	

PS Description	Project Applicability
<p>Increased industrial activity and urbanization often generate increased levels of pollution to air, water and land that may threaten people and the environment at the local, regional and global level. Borrowers are required to integrate pollution prevention and control technologies and practices (as technically and financially feasible as well as cost-effective) into their business activities.</p>	<p>The Project is not likely to have many large-scale and long-term impacts related to pollution. Measures to address air, water and land pollution will be contained in the EMPr. There are no material resource efficiency issues associated with the proposed development and the EMPr will include general resource efficiency measures.</p> <p>The project is not greenhouse gas (GHG) emissions intensive and the detailed assessment and reporting of emissions is not required. This project, however, seeks to facilitate resource efficiency and pollution prevention by contributing to the South African green economy. The project will not release industrial effluents and waste generation will be managed according to the EMPr. Hazardous materials are not a key issue; small quantities of construction materials (oil, grease, diesel fuel etc.) are the only wastes expected to be associated with the project.</p> <p>Land contamination of the site from previous land use is not a concern as the project area is mostly an agricultural area where low intensity agriculture / grazing is practiced.</p>
<p><b>Performance Standard 4: Community Health, Safety, and Security</b>  <b>Objective:</b> Recognizes that projects can bring benefits to communities but can also increase potential exposure to risks and impacts from incidents, structural failures, and hazardous materials.</p>	
<p>Business activities can increase the potential for community exposure to risks and impacts arising from equipment accidents, structural failures and releases of hazardous materials as well as impacts on a community's natural resources, exposure to diseases and the use of security personnel. Borrowers are responsible for avoiding or minimizing the risks and impacts to community health, safety and security that may arise from their business activities.</p>	<p>The requirements for PS 4 have been addressed in this report and will be managed in accordance with the EMPr.</p> <p>It is understood that the project infrastructure and equipment will be designed to good industry standards to minimise risks to communities, however a community health and safety plan should be compiled by the Applicant prior to construction to meet the requirements of IFC Performance Standard 4 (Community Health, Safety and Security). To ensure compliance with PS 4, Applicant will need to evaluate the risks and impacts to the health and safety of the affected community during the design, construction and operation of the proposed development and establish preventive measures to address them in a manner commensurate with the identified risks and impacts as contained in this report. Such measures need to adhere to the precautionary principle for the prevention or avoidance of risks and impacts over minimization and reduction.</p>
<p><b>Performance Standard 5: Land Acquisition and Involuntary Resettlement</b>  <b>Objective:</b> Applies to physical or economic displacement resulting from land transactions such as expropriation or negotiated settlements.</p>	
<p>Land acquisition due to the business activities of a Borrowers may result in the physical displacement (relocation or loss of shelter) and economic displacement (loss of access to resources necessary for income generation or as means of livelihood) of individuals or communities. Involuntary resettlement occurs when affected individuals or communities do not have the right to refuse land acquisition and are displaced, which may result in</p>	<p>Not Applicable</p>

PS Description	Project Applicability
<p>long-term hardship and impoverishment as well as environmental damage and social stress. Borrowers are required to avoid physical or economic displacement or minimize impacts on displaced individuals or communities through appropriate measures such as fair compensation and improving livelihoods and living conditions.</p>	
<p><b>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>  <b>Objective:</b> Promotes the protection of biodiversity and the sustainable management and use of natural resources.</p>	
<p>Protecting and conserving biodiversity (including genetic, species and ecosystem diversity) and its ability to change and evolve, is fundamental to sustainable development. Borrowers are required to avoid or mitigate threats to biodiversity arising from their business activities and to promote the use of renewable natural resources in their operations.</p>	<p>In terms of protecting and conserving biodiversity, specialists have assessed the impacts of the proposed development within the area of influence and will recommend further measures to prevent/avoid/mitigate these potential impacts during the EIA phase. Specialist methods include a combination of literature review, stakeholder engagement and consultation, and in-field surveys. This substantively complies with the PS 6 general requirements for scoping and baseline assessment for determination of biodiversity and ecosystem services issues. The determination of habitat sensitivity was undertaken within the legal and best practice reference framework for South Africa.</p>
<p>Performance Standard 7: Indigenous Peoples  <b>Objective:</b> Aims to ensure that the development process fosters full respect for Indigenous Peoples.</p>	
<p>Indigenous Peoples are recognized as social groups with identities that are distinct from other groups in national societies and are often among the marginalized and vulnerable. Their economic, social and legal status may limit their capacity to defend their interests and rights to lands and natural and cultural resources. Borrowers are required to ensure that their business activities respect the identity, culture and natural resource-based livelihoods of Indigenous Peoples and reduce exposure to impoverishment and disease.</p>	<p>Not Applicable. As per the international instruments under the United Nations (UN) Human Rights Conventions, no indigenous peoples are present within the study area. The Project does not involve displacement.</p>
<p>Performance Standard 8: Cultural Heritage  <b>Objective:</b> Aims to protect cultural heritage from adverse impacts of project activities and support its preservation.</p>	
<p>Aims to protect cultural heritage from adverse impacts of project activities and support its preservation.</p>	<p>A cultural heritage impact assessment and paleontological impact assessment will be undertaken for the proposed development. Consultation has been undertaken with the SAHRA and will continue during the EIA phase.</p>

## 4. SCOPE OF WORK AND EIA PHASE METHODOLOGY

The EIA process formally commenced with notifying the CA, in this case the DFFE, of the proposed development through the submission of an application form. The EAP, along with the team of technical specialists, commenced the scoping phase to make informed decisions of the appropriate "scope" of the EIA process. The existing environmental baseline of the site proposed for development was established during this phase through a desktop assessment and site visits. The type of development was considered and its anticipated impacts on the existing environment informed the specialists' studies to be undertaken. The methodology of how these impacts have been assessed within the EIA phase is also determined. The EIA Phase was undertaken in line with the approved PSEIA. The environmental impacts, mitigation and closure outcomes as well as the residual risks of the proposed activity has been set out in the EIA report.

A Draft Scoping Report (DSR) (ERM, February 2024) for the proposed development was made available for public and stakeholder comment for a prescribed 30-day consultation period. All comments received in response to the DSR were considered and as appropriate, incorporated into the FSR and Plan of Study for EIA (PSEIA). The FSR and PSEIA (ERM, April 2024) were then submitted to the DFFE for approval. Interested and Affected Parties (I&APs) were able to review FSR and PSEIA as submitted to the DFFE.

The FSR presented and assessed the initial proposed WEF layout and associated infrastructures of the Khoe WEF and its associated infrastructure. In May 2024, the DFFE accepted the FSR. The results of the specialists' scoping assessments, DFFE comments on the FSR, and other technical and financial constraints for the proposed development site were taken into consideration and a revised preferred layout was produced.

This EIA report presents and assesses a revised mitigated layout for the proposed development and will be made available for a prescribed 30-day consultation period. Any comments received will be considered and incorporated as applicable into a Final EIA report. Once a Final EIA report has been submitted, the DFFE will make a decision within 107 days on whether to grant or refuse EA. I&APs will be notified of the availability of the Final EIA report for their review as per the FSR.

### 4.1 DFFE ENVIRONMENTAL SCREENING TOOL

In terms of GN R960 (promulgated on 5 July 2019) and Regulation 16 (1)(b)(v) of the EIA Regulations, 2014 (as amended), the submission of a Screening Report generated from the national web based environmental screening tool is compulsory for the submission of Basic Assessment (BA) and EIA applications in terms of Regulation 19 and 21 of EIA Regulations, 2014 (as amended). The Screening Report generated for the proposed development is included in Volume II of this Report.

The screening report was generated based on the selected classification, i.e., Infrastructure | Electricity | Generation | Renewable | Solar | PV. No intersections with Environmental Management Frameworks (EMF) were found. In terms of development incentives, restrictions, exclusions or prohibitions, no intersections with any development zones were found.

Based on the selected classification to produce the screening tool report, and the environmental sensitivities of the development footprint, the screening report generates a list of specialist

assessments identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study.

Table 4-1 provides a summary of the specialist assessments identified by the screening tool reports, and the response to each assessment in terms of the proposed development.

Specialist assessments undertaken (Volume II) have considered the results of the DFFE Screening Tool in their terms of reference.

**TABLE 4-1 ENVIRONMENTAL THEMES FROM SCREENING TOOL WHICH NEEDS TO ADHERE TO IN THE ENVIRONMENTAL AUTHORISATION PROCESS**

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
Agriculture Theme	Protocol for the Specialist Assessment and Minimum Report Content Requirements of Environmental Impacts on Agricultural Resources by Onshore Wind and/or Solar Photovoltaic Energy Generation Facilities where the Electricity Output is 20 MW or more, gazetted on 20 March 2020. This protocol replaces the requirements of Appendix 6 of the Environmental Impact Assessment Regulations.	High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>The site is classified as ranging from low to high agricultural sensitivity by the screening tool. The site sensitivity verification verifies those parts of the site that are indicated as cropland in this assessment as being of high agricultural sensitivity, and the rest of the site as being of low to medium agricultural sensitivity.</p>		
Landscape / Visual Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Very High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>Overall, the significance of the visual impacts associated with the proposed Khoe Wind Energy Facility is expected to be very high to high as a result of the generally undeveloped character of the landscape and its inability to absorb changes of this magnitude. Additionally, the facility would be visible within an area that contains certain sensitive visual receptors who already consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors</p>		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	include people travelling along the R318 and secondary roads, as well as, residents of rural homesteads and tourists passing through or holidaying in the region.		
Archaeological and Cultural Heritage Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Low Sensitivity	Low Sensitivity
	Comment: The screening tool report shows the archaeological and heritage sensitivity to be low throughout the study area. The site visit confirmed that the site is a heritage environment of variable sensitivity but that significant impacts on archaeological resources arising from the project are unlikely.		
Noise Theme	Protocol for specialist assessment and minimum report content requirements for Noise Impacts, gazetted on 20 March 2020.	Very High Sensitivity	Very High Sensitivity
	Comment: There are permanent or temporary residential activities, and these locations are located within 2,000m from the area where wind turbines may be developed. These residential activities are considered to be noise-sensitive and the areas are considered to have a "Very High" sensitivity to noise.		
Flicker Theme	Verification requirements where a specialist assessment is required but no Specific Assessment Protocol has been prescribed, gazetted 20 March 2020.	Very High Sensitivity	Moderate Sensitivity
	Comment: According to the Visual Impact Assessment, the significance of shadow flicker is anticipated to be moderate.		
Paleontology Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no	Very High Sensitivity	Very High Sensitivity

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	<p>specific assessment protocol has been prescribed, gazetted on 20 March 2020.</p> <p>Comment: This development area was allocated a rating of Very High Sensitivity by the SAHRIS Palaeosensitivity Map and DFFE Screening Tool. However, a paleontological assessment for the adjacent proposed Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual paleontological sensitivity of that project area is much lower than indicated on the SAHRA map.</p>		
Terrestrial Biodiversity Theme	<p>Protocol for the Specialist Assessment and minimum report content requirements for Environmental Impacts on Terrestrial Biodiversity, gazetted on 20 March 2020.</p> <p>Comment: The site is predominantly classified as Low Sensitivity by the Department of Forestry, Fisheries and the Environments (DFFE) Online Screening Tool (ST), while remaining areas are classified as Very High Sensitivity. This is due to the intersection of the PAOI with various important biodiversity areas including Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and Freshwater Ecosystem Priority Areas (FEPA) associated with the Langeberg-Wes Mountain Catchment. It is the Specialist’s opinion that the DFFE Online ST assessment of Very High Sensitivity in the Terrestrial Biodiversity Theme is correct, and a Specialist EIA Report must be submitted.</p>	Very High Sensitivity	Very High Sensitivity
Aquatic Biodiversity Theme	<p>Protocol for the Specialist Assessment and minimum report content requirements for Environmental Impacts on Aquatic Biodiversity, gazetted on 20 March 2020.</p> <p>Comment: The DFFE Screening Tool, the site contains areas of very high sensitivity due to the presence of: Critical Biodiversity Areas (CBA) 1: Aquatic</p>	Very High Sensitivity	Very High Sensitivity



Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	<p>Ecological Support areas (ESA) 1: Aquatic</p> <p>The specialist agrees with the environmental sensitivities identified on site. The findings have been informed by a site visit undertaken by Dr Brian Colloty in 1-3 September 2023. Some of the systems observed are sensitive and thus shown in this assessment as No-Go i.e. Very High sensitivity.</p>		
Avian Theme	<p>Protocol for the specialist assessment and minimum report content requirements for the Environmental Impact Assessment Regulations, 2014 (GNR 326, 7 April 2017) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).</p>	High Sensitivity	High Sensitivity
	<p>Comment: The DFFE Screening Tool (Animal Theme) classified the area as of High Sensitivity (based on the presence of four Red Data species). Birdlife South Africa’s national Avian Sensitivity Map suggests low to medium-high sensitivity for birds and Wind Energy Facility. Inspection of the national bird atlas data set (SABAP 2) including our own species records added an additional Red Data species (Lanner Falcon <i>Falco biarmicus</i>) and other collision-prone species. We, thus, concur with the Screening Tool’s assessment that the site is of High Sensitivity, and the data and models that follow allow us to reduce risk by constructing a detailed spatial picture of the risks to the Priority birds present.</p>		
Civil Aviation Theme	<p>Protocol for the specialist assessment and minimum report content requirements for Environmental Impacts on Civil Aviation Installations, gazetted on 20 March 2020.</p>	High Sensitivity	High Sensitivity
	<p>Comment: The Screening Tool Report indicated that there are Civil Aviation Installations within 8km of the proposed development. As such, the Civil Aviation Theme is allocated a High Sensitivity rating. The Civil Aviation Authority has requested that the Project Proponent applies or Obstacle</p>		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	approval by following the process outlined in their website. This will be done as required prior to the commencement of construction activities.		
Defence Theme	Protocol for the specialist assessment and minimum report content requirements for Environmental Impacts on Defence Installations, gazetted on 20 March 2020.	Medium Sensitivity	Low Sensitivity
	Comment: Site verification confirms the low sensitivity. During the public consultation, the South African National Defense Force (SANDF) was consulted by the EAP / Project Applicant to confirm that there will be no impact on the defense installation of the development area and immediate surrounds.		
Radio Frequency Interference (RFI) Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Low Sensitivity	Low Sensitivity
	Comment: Site verification confirms the low sensitivity. During the public consultation, the South African Radio Astronomy Observatory (SARAO) was consulted by the EAP / Project Applicant to confirm that there will be no impact on the Radio Frequency Interference (RFI) within the immediate surrounds of the development.		
Geotechnical Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined	Not Determined
	Comment: Geotechnical assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. The EAP is of the opinion that a Geotechnical Assessment for the development can and will only be undertaken prior to the		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	commencement of the construction phase. The EAP has not included this assessment as part of the application process.		
Plant Species Theme	Protocol for specialist assessment and minimum report content requirements for Environmental Impacts on Terrestrial Plant Species, gazetted on 20 March 2020.	High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>It is the Specialists opinion that SCC are likely present on site, therefore the DFFE Online ST Assessment of High Sensitivity in the Plant Species Theme for some areas is accurate. High sensitivity areas are predominantly those listed as CBAs. All other areas are either Medium Sensitivity or Low Sensitivity.</p>		
Animal Species Theme	Protocol for specialist assessment and minimum report content requirements for Environmental Impacts on Terrestrial Animal Species, gazetted on 20 March 2020.	High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>Two non-avian SCCs were included in the Screening Tool output, with Insecta-Aloeides caledoni and Mammalia-Bunolagus monticularis listed as 'Medium' sensitivity. The desktop study revealed two SCCs potentially present in the study site that were not included in the Screening Tool output, namely Grey Rhebok (Pelea capreolus) and Leopard (Panthera pardus). Grey Rhebok were confirmed as present within the project site, while Riverine Rabbit was confirmed as present in the surrounding area but not within the project boundary. Leopard were considered to have a high probability of utilizing at least parts of the study site on occasion. The Caledon Copper (Aloeides caledoni) is considered Least Concern and unlikely to occur in areas identified for development.</p> <p>From an avifaunal perspective, it can be confirmed the site is of High Sensitivity, and the data and Collision Risk Models allows for the reduce risk by constructing a detailed spatial picture of the risks to the Priority birds present.</p>		
Bats Animal Theme	Site Sensitivity Verification Requirements where a Specialist	High Sensitivity	High Sensitivity

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.		
	Comment: The Department of Forestry, Fisheries, and the Environment’s (DFFE) Screening Tool Report showed a high sensitivity to the bats (wind) theme. The required Site Sensitivity Verification Report confirmed that the proposed Khoe WEF has high sensitivity in terms of bats, which had been confirmed by the bat monitoring exercise due to general high bat activity.		
Socio-Economic Assessment	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined.	Not Determined.
	Comment: Socio-economic assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. A full impact assessment was undertaken by the specialist for the EIA phase of the development.		
Traffic Assessment	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined	Medium to Low Sensitivity
	Comment: Traffic assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. A desk-based traffic assessment was undertaken for the proposed development as well as a site visit. The outcome of the specialist assessment confirms that the proposed development and final layout can be supported from a traffic engineering point of view. The base year and forecast year road capacity has indicated that the proposed development will have little to no significant impact on the existing road network capacity and intersection operational performance.		

## 4.2 SPECIALIST METHODOLOGY

To evaluate the potential environmental impacts, information relating to the existing environmental conditions were collected through field and desktop research; this is known as the baseline. Climate change is expected to affect the proposed development site over the lifetime of the proposed development; however, the nature, scale and severity of climate change effects are uncertain. Given this uncertainty, the existing environment is assumed to remain constant throughout the lifetime of the proposed development, and forms the current and future baseline for the impact assessments.

### 4.2.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

The assessment was based on an on-site investigation of the soils and agricultural conditions conducted on 24 October 2023. It was also informed by existing climate, soil, and agricultural potential data for the site. The aim of the on-site assessment was to:

- Ground-truth cropland status;
- Ground truth the land type soil data and achieve an understanding of the general range and distribution patterns of different soil conditions across the site; and
- Gain an understanding of overall agricultural production potential across the site.

Soils were assessed based on the investigation of existing soil exposures in combination with indications of the surface conditions and topography. Soils were classified according to the South African soil classification system (Soil Classification Working Group, 1991).

This level of soil assessment is considered entirely adequate for an understanding of on-site soil potential for the purposes of a wind farm assessment. For this purpose, only an understanding of the general range and distribution patterns of different soil conditions across the site is required. A more detailed soil survey would be extremely time consuming and impractical to conduct, given the very large assessment area, and would not provide any additional data that would add value to the assessment of the agricultural impact of the wind farm.

This is because a wind farm extends over a very large surface area. The layout design of a wind farm is complex and there are multiple interacting factors that determine the turbine locations that will ensure the viability of the wind farm. Each turbine influences the amount of wind that the other turbines receive. Therefore, the location of one turbine cannot simply be shifted without requiring other turbines to be shifted as well, to retain the viability of all the turbines. To shift turbines to account for variation in soil conditions would be extremely complex and would require a level of soil mapping detail across the whole wind farm area that would be practically impossible to achieve. Even with this level of detail, it is highly unlikely that it would have any influence on agricultural impact.

An assessment of soils and long-term agricultural potential is in no way affected by the season in which the assessment is made, and therefore the date on which this assessment was done has no bearing on its results

### 4.2.2 NOISE

This study considered local regulations and both local and international guidelines, using the terms of reference proposed by SANS 10328:2008 for a comprehensive Environmental Noise

Impact Assessment ('ENIA') and as proposed by the requirements specified in the Assessment Protocol for Noise that were published on 20 March 2020, in Government Gazette 43110, GN 320. The study also considered the noise limits as proposed by IFC which is based on studies completed by the World Health Organization ('WHO').

Ambient sound levels were measured previously in areas with a similar developmental character. The data indicate ambient sound levels are generally low, with faunal and other natural sounds as the main source of noise in the area. Wind-induced noises influence ambient sound levels during periods with increased winds, with the ambient sound levels determined by numerous factors (vegetation type and density, faunal species in the area, etc.).

Due to a few wind turbines proposed within an area with a potential high sensitivity to noise, a full environmental noise impact study was conducted. The initial assessment was a desktop study and was assessed in terms of the Noise Sensitivity Theme using the National Web-based Environmental Screening Tool. Basic predictive models were also used to identify potential issues of concern.

Residential areas and potential noise-sensitive developments/receptors/communities (NSR) were identified using aerial images up to 2,000 m (recommendation SANS 10328:2003) from potential turbine locations. The statuses of these structures were verified during the site in December 2022 and September 2023 during periods with low winds. The ambient sound levels were measured in terms of Government Notice Regulation 320 of March 2020.

#### 4.2.3 FRESHWATER AND WETLANDS (AQUATICS)

The methodology used by the specialist was developed with the renewable industry in mind, coupled with the minimum requirements stipulated by DFFE and the Department of Human Settlement, Water and Sanitation (DHSWS). The study followed the approaches of several national guidelines regarded for aquatic assessments. These were then modified by the specialist, to provide a relevant mechanism of assessing the present state of the study systems applicable to the specific environment, and in a clear and objective manner, assess the potential impacts associated with the proposed development site. The methodology also included the considerations of the Macfarlane & Bredin (2017) buffer models and revisions to the SANBI National Wetland Inventory.

The assessment made use of the National Wetland Classification System (NWCS) approach and included delineating any natural waterbodies and assessing the potential consequences of the proposed development on the surrounding watercourses.

The findings of the specialist assessment were supported by baseline data during a site visit, 1-3 September 2023, after heavy rainfall and the onset of the growing season.

The aquatic report was produced to meet the criteria to fulfil a Specialist Assessment Report as portions of the proposed development area were rated as very high sensitivity as per the DFFE Screening Tool.

## 4.2.4 TERRESTRIAL BIODIVERSITY

### 4.2.4.1 DESKTOP STUDY

The desktop study was initiated by obtaining the proposed development area's expected sensitivity in the Terrestrial Biodiversity Theme using the DFFE Online Screening Tool (ST)<sup>6</sup>, which is informed by the Western Cape Biodiversity Spatial Plan<sup>7</sup>. The recorded land-use of the proposed PAOI was determined using the latest available South African National Land Cover (SANLC, 2020)<sup>8</sup> spatial datasets and Quantum Geographic Information System (QGIS). These data were compared with previously identified important biodiversity areas in proximity to the Project by consulting the following resources:

- The Red List of Ecosystems (RLE, 2022) spatial dataset<sup>9</sup> to determine the Red List Status and Category of ecosystem(s) within the proposed PAOI.
- The Breede valley Key Biodiversity Areas (KBA) spatial dataset<sup>10</sup> was used to determine the presence of Critical Biodiversity Areas (CBA1/2), Ecological Support Areas (ESA1/2), Protected Areas (PA) and Other Natural Areas (ONA) within the proposed PAOI.
- The SANBI 2018 Beta Vegetation Map of South Africa, Lesotho and Swaziland Spatial Dataset<sup>11</sup> to determine the Vegetation Units present within the proposed PAOI.
- The 2011 National Freshwater Ecosystem Priority Areas (NFEPA) river<sup>12</sup> and wetland<sup>13</sup> datasets.
- The International Union for the Conservation of Nature's (IUCN) Red List<sup>14</sup> to confirm the international Red List Status and Category of plant species that have been recorded in the proposed PAOI.

In addition, the resources below were consulted to compile a list of plant and animal SCC that are potentially present within the proposed development area footprint:

- The SANBI Plants of Southern Africa (POSA) Brahms database<sup>15</sup> to identify plant species that have been recorded in the proposed PAOI.
- The Biodiversity and Development Institute's Virtual Museum database<sup>16</sup> to determine the presence of plant and animal species that have been recorded in the proposed PAOI.
- The Global Biodiversity Information Facility (GBIF) database<sup>17</sup> to determine the presence of plant and animal species that have been recorded in the proposed PAOI.
- The SANBI Red List of South African Species<sup>18</sup> to confirm the national Red List Status and Category of species that have been recorded in the proposed PAOI.

<sup>6</sup> <https://screening.environment.gov.za/screeningtool/#/pages/welcome>

<sup>7</sup> [https://www.capenature.co.za/uploads/files/protected-area-management-plans/SANBI\\_WCBSP-Handbook.pdf](https://www.capenature.co.za/uploads/files/protected-area-management-plans/SANBI_WCBSP-Handbook.pdf)

<sup>8</sup> [https://eqis.environment.gov.za/sa\\_national\\_land\\_cover\\_datasets](https://eqis.environment.gov.za/sa_national_land_cover_datasets)

<sup>9</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/6715>

<sup>10</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/641>

<sup>11</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/670>

<sup>12</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/397>

<sup>13</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/395>

<sup>14</sup> <https://www.iucnredlist.org/>

<sup>15</sup> <https://posa.sanbi.org/sanbi/Explore>

<sup>16</sup> <https://vmus.adu.org.za/>

<sup>17</sup> <https://www.gbif.org/>

<sup>18</sup> <http://speciesstatus.sanbi.org/>

The International Union for the Conservation of Nature's (IUCN) Red List<sup>19</sup> to confirm the international Red List Status and Category of plant species that have been recorded in the proposed PAOI.

#### 4.2.4.2 SITE VERIFICATION

The specialist spent two days on site (28 - 29 June 2022) in conjunction with the terrestrial animal specialist retrieving camera trap data and replacing Secure Digital (SD) memory cards to verify the sensitivity of the proposed study area as described by the DFFE Online ST, and land use as described by the SANLC (2020).

An additional site visit was conducted (10 – 16 March 2024) to conduct terrestrial biodiversity surveys to determine species presence and distribution on site in correlation with the Scoping Phase project layout.

#### 4.2.4.3 SITE ECOLOGICAL IMPORTANCE

Habitat sensitivity is determined as a function of several factors including the presence and distribution of SCC, intactness of habitat, extent of impacts, and the capacity of the habitat to withstand and/or recover from disturbance. These factors are assessed on a scale from 'Low' to 'Very High' according to pre-determined conditions and incorporated into a formula to determine the Site Ecological Importance (SEI) for each habitat.

### 4.2.5 FAUNAL

#### 4.2.5.1 DESKTOP STUDY

The output of the Screening Tool was supplemented with outputs from biodiversity databases such as the various atlasing projects of the Virtual Museum<sup>20</sup>, iNaturalist<sup>21</sup> and the GBIF<sup>22</sup> network to determine which additional species may occur in the area. Conservation status was cross-referenced with National<sup>23</sup> and International<sup>24</sup> databases. Publicly available data and published literature were consulted and referenced throughout, where relevant.

#### 4.2.5.2 SITE SURVEY

A total of eleven sampling sites were included in the assessment. Sampling for the Khoe WEF was conducted concurrently with the nearby Hugo WEF as the latter was considered to be representative of the habitats available and likely species in the broader area. Two camera traps were positioned within the proposed project boundary itself (Figure 4-1).

- **Duration:** 44 weeks
- **Date:** 17 February 2022 – 23 December 2022
- **Season:** Late summer, autumn, winter, spring and early summer
- **Relevance:** Sampling was conducting through a wide-range of conditions experienced over the monitoring period, increasing confidence in the outcome of the assessment
- **Effort:** Camera traps were deployed across the site for a combined 612 nights.

<sup>19</sup> <https://www.iucnredlist.org/>

<sup>20</sup> [http://vmus.adu.org.za/vm\\_projects.php](http://vmus.adu.org.za/vm_projects.php)

<sup>21</sup> <https://www.inaturalist.org/>

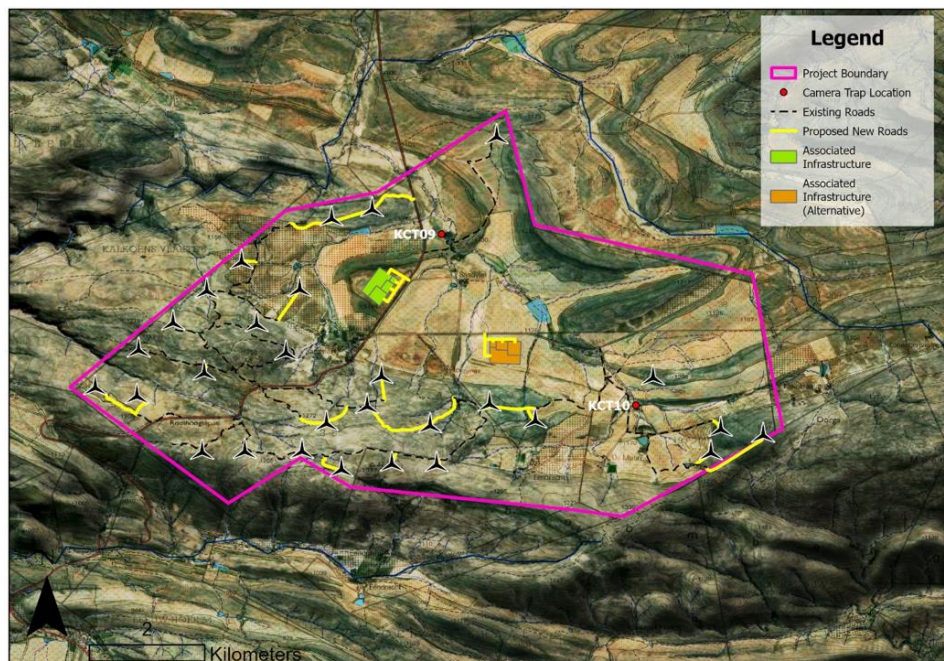
<sup>22</sup> <http://gbif.org>

<sup>23</sup> <http://speciesstatus.sanbi.org/>

<sup>24</sup> <https://www.iucnredlist.org/>



FIGURE 4-1 CAMERA TRAP SAMPLING SITES



Spartan Lumen Dual Flash Scouting Cameras (Model: SR3-CX S39) were utilized in the study to provide high-quality, full-colour, night-time images (i.e. using white-flash) to facilitate positive differentiation between Riverine Rabbit and hares. Passive Infrared (PIR) sensor sensitivity was set to “normal” using the in-camera settings, with a trigger interval (quiet period) of 5 seconds.

#### 4.2.5.3 DATA ANALYSIS

An initial, automated batch classification was on raw image data in R<sup>25</sup> using MegaDetector to classify images into ‘blank’ (i.e. false-triggers) or animal detections. Automatic classifications were manually validated prior to manual species identification. Data was captured following the Camera Trap Metadata Standard (CTMS)<sup>26</sup> and explored following modified methods obtained from the Wildlife Coexistence Lab<sup>27</sup>. Camera Trap labelled ODCT11 was excluded from image analyses as it was set to record video rather than static images and records were therefore considered separately.

<sup>25</sup> R Core Team (2021). R: A language and environment for statistical computing. R Foundation for Statistical Computing, Vienna, Austria. URL <https://www.R-project.org/>

<sup>26</sup> Forrester, T., T. O'Brien, E. Fegraus, P. Jansen, J. Palmer, R. Kays, J. Ahumada, B. Stern and W. McShea. (2016). An Open Standard for Camera Trap Data. *Biodiversity Data Journal*. 4:e10197. <https://doi.org/10.3897/BDJ.4.e10197>

<sup>27</sup> Department of Forest Resources Management, University of British Columbia, 2424 Main Mall, Vancouver, BC, Canada V5T 1Z4

#### 4.2.5.4 SENSITIVITY MAPPING

The 2020 South African National Land-Cover (SANLC) dataset, 2022 Red List of Ecosystems for terrestrial realm for South Africa, publicly available satellite imagery, normalized difference vegetation index (NDVI), Screening Tool output and field observations of vegetative cover were considered in combination with camera trap survey data to delineate habitats relevant to the impacts of the proposed development type and animal SCCs.

#### 4.2.6 FLORA

##### 4.2.6.1 DESKTOP STUDY

The desktop study was initiated by obtaining the proposed development area's expected sensitivity in the Plant Theme using the DFFE ST<sup>28</sup>. The recorded land-use of the proposed PAOI was determined using the latest available South African National Land Cover (SANLC, 2020)<sup>29</sup> spatial datasets and Quantum Geographic Information System (QGIS). These data were compared with previously identified important biodiversity areas in proximity by consulting the following resources:

- The Red List of Ecosystems (RLE, 2022) spatial dataset<sup>30</sup> to determine the Red List Status and Category of ecosystem(s) within the proposed PAOI.
- The Breede Valley Key Biodiversity Areas (KBA) spatial dataset<sup>31</sup> was used to determine the presence of Critical Biodiversity Areas (CBA1/2), Ecological Support Areas (ESA1/2), Protected Areas (PA) and Other Natural Areas (ONA) within the proposed PAOI.
- The SANBI 2018 Beta Vegetation Map of South Africa, Lesotho and Swaziland Spatial Dataset<sup>32</sup> to determine the Vegetation Units present within the proposed PAOI.
- In addition, the resources below were consulted to compile a list of plant SCC that are potentially present within the proposed development area footprint:
- The SANBI POSA Brahm's database<sup>33</sup> to identify plant species that have been recorded in the proposed PAOI.
- The Biodiversity and Development Institute's Virtual Museum database<sup>34</sup> to determine the presence of plant species that have been recorded in the proposed PAOI.
- The Global Biodiversity Information Facility (GBIF) database<sup>35</sup> to determine the presence of plant species that have been recorded in the proposed PAOI.
- The SANBI Red List of South African Species<sup>36</sup> to confirm the national Red List Status and Category of plant species that have been recorded in the proposed PAOI.
- The Red List of South African Plant Species<sup>37</sup> to confirm the national Red List Status and Category of plant species that have been recorded in the proposed PAOI.

<sup>28</sup> <https://screening.environment.gov.za/screeningtool/#/pages/welcome>

<sup>29</sup> [https://egis.environment.gov.za/sa\\_national\\_land\\_cover\\_datasets](https://egis.environment.gov.za/sa_national_land_cover_datasets)

<sup>30</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/6715>

<sup>31</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/641>

<sup>32</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/670>

<sup>33</sup> <https://posa.sanbi.org/sanbi/Explore>

<sup>34</sup> <https://vmus.adu.org.za/>

<sup>35</sup> <https://www.gbif.org/>

<sup>36</sup> <http://speciesstatus.sanbi.org/>

<sup>37</sup> <http://redlist.sanbi.org/index.php>

- The International Union for the Conservation of Nature's (IUCN) Red List<sup>38</sup> to confirm the international Red List Status and Category of plant species that have been recorded in the proposed PAOI.

#### 4.2.6.2 SITE VERIFICATION

The specialist spent two days on site (28 - 29 June 2022) in conjunction with the terrestrial animal specialist retrieving camera trap data and replacing Secure Digital (SD) memory cards to verify the sensitivity of the proposed study area as described by the DFFE Online ST, and land-use as described by the SANLC (2020).

An additional site visit was conducted (10 – 16 March 2024) to conduct terrestrial biodiversity surveys to determine species presence and distribution on site in correlation with the Scoping Phase project layout.

#### 4.2.6.3 SITE ECOLOGICAL IMPORTANCE

Habitat sensitivity is determined as a function of several factors including the presence and distribution of SCC, intactness of habitat, extent of impacts, and the capacity of the habitat to withstand and/or recover from disturbance. These factors are assessed on a scale from 'Low' to 'Very High' according to pre-determined conditions and incorporated into a formula to determine the Site Ecological Importance (SEI) for each habitat.

#### 4.2.7 AVIFAUNA

In accordance with the Best Practice guidelines for assessing and monitoring the impact of wind energy facilities on birds in southern Africa (Jenkins et 2015), four seasonally timed site visits across the entire 8,184 ha study area were undertaken to record all flights and heights of Priority species.

A 12-month monitoring programme for the developable area was undertaken. The report and monitoring programme followed the "Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Avifaunal Species by Onshore Wind Energy Generation Facilities where the Electricity Output is 20 Megawatts or More" (Government Gazette 43110, GN 320, 20 March 2020).

All areas were covered, and species flights recorded, these are shown in Figure 4-2 below. Methods for the Vantage Point (VP) monitoring was undertaken according to the BARESG monitoring protocols (Jenkins et al. 2015).

##### 4.2.7.1 VANTAGE POINT SURVEYS

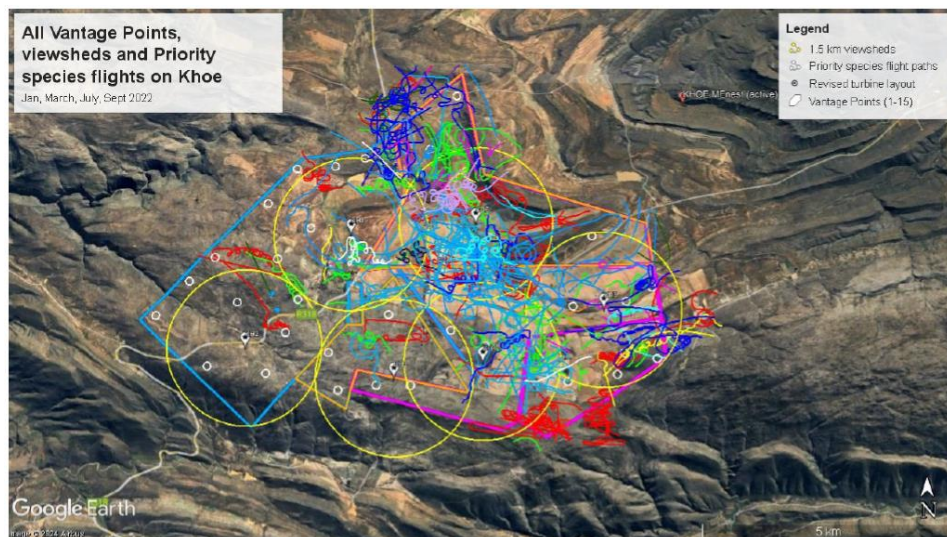
VP observations are the most important form of data collection for avifaunal surveys on wind farms (Jenkins et al., 2015). To cover the full extent of the proposed site whilst ensuring minimal overlap between VPs, a total of 6 VPs, each within a 1.5 km viewshed, were overlaid on the proposed study site. Subject to weather conditions, each VP was surveyed over three days in six-hour sessions (18-hours in total per VP) during either early morning or afternoon hours to ensure that the full range of bird-active hours was monitored.

"Priority" species are defined as the top 100 most collision-prone species (Ralston-Paton et al., 2017). On site, when a Priority species is identified, the flight height and behaviour are recorded every 15 seconds until the bird leaves the VP viewshed or lands. Flight paths are

<sup>38</sup> <https://www.iucnredlist.org/>

drawn onto printed A3 maps with associated variables recorded on the reverse of the data sheets. These include species, number of individuals, age, sex, flight duration, flight height in metres at 15 second intervals, flight behaviour, and habitat details. Flight paths and associated data are later transcribed into digital format for further mapping and analysis. Examples of the flights of all Priority species are shown in Figure 4-2 and are undertaken over four equally spaced seasons for the proposed Khoe WEF. This approach ensured that all biologically important periods were covered: summer for full complement of migrants, autumn for migration, winter for start of the breeding season for large eagles, and spring for the breeding of most other species (harriers, cranes).

**FIGURE 4-2 THE PROPOSED KHOE WIND ENERGY FACILITY, INDICATING ALL VANTAGE POINTS (= WHITE BALLOONS), ASSOCIATED 1.5-KM VIEWSHEDS (= YELLOW CIRCLES), AND THE REVISED (29) TURBINE POSITIONS (= SMALL BLACK/WHITE CIRCLES)**



#### 4.2.7.2 COLLISION RISK MODELLING (CRM)

Collision Risk Modelling (CRM), developed by Band et al. (2007), has been used for many years to more precisely assess the risk to birds as they pass through a wind energy facility environment. More sophisticated models that take uncertainty into account have since appeared (New et al. 2015), fine-tuning the analysis. It is based on a combination of:

- The probability of collision;
- The birds' exposure to turbines (in time and space); and
- A measure of the spatial and temporal extent over which a bird is at risk of collision (the hazardous footprint).

By incorporating uncertainty into the equations, through a Bayesian modelling approach, more realistic estimates of the risk of fatalities are incorporated into the new model (New et al. 2015). The modelling used here has been taken a quantum leap forward by Dr Robin Colyn, as it also incorporates Habitat Suitability Models (HSM), terrain, topography and seasonality.

Collision Risk Modelling was used in this study to fine-tune areas where Priority collision prone species are most likely to impact future wind turbines. This work is only the second time that CRM has been undertaken for an entire wind energy facility in southern Africa, across a suite of collision-prone species identified on site.

#### 4.2.7.3 GENERAL RISK ANALYSIS

The following variables were used to inform the CRM:

- Flight density (Passage Rates of flights per hour for each species);
- Flight heights (proportion of time spent within the blade-swept (BSA) or risk area);
- Habitats;
- Proposed turbine specifications;
- Topography (some raptors use slope and lift in their daily flights); and
- Seasonality (temporal use).

The result is a quantitative prediction of high-risk flights, presented as a proportion of time spent within the BSA. These are presented as classes from 1 (lowest risk) to 8 (highest risk).

#### 4.2.7.4 SITE SPECIFIC RISK ANALYSIS

Time spent in the BSA does not alone predict collision risk. Several other factors could influence collision-risk. For example, increased exposure to a turbine(s) could increase collision risk.

The CRM was taken one step further by including the following inputs:

- Turbine positions available at the time (possible indicator of turbine exposure);
- Conservation status (whereby Red Data species were given a higher weighting than Least Concern Species); and
- The turbine collision propensity of individual species derived from empirical data provided from South African Wind energy facility fatalities (Perold et al. 2020). More fatalities result in a higher ranking.

The result of this second phase of modelling is a "heat map" of the cluster showing the relationship between collision-risk of all Priority species and the proposed turbine layout. By observing the change in colours across the map, one can gauge the change in collision-risk.

Once the collision-risks had been represented spatially, the next step is to determine which risk classes (colours) were acceptable for development, which required mitigation, and which required avoidance altogether.

Because there are few established thresholds for acceptable impacts on bird species in South Africa, this was mainly based on subjective opinion. However, for some species such as the Black Harrier, we know that the death of three to five more adults per year would send the population to extinction in approximately 75 years (Cervantes et al. 2022). Thus, for such precarious species we set the bar at zero fatalities for Black Harriers.

#### 4.2.8 BATS

##### Desktop Investigation

A desktop study was conducted for the site, using the information provided by the representative of the developer, as well as information gathered through a literature review. Although there are



no other wind farms within a 30 km radius, other renewable energy developments were noted and consulted as appropriate. Bat species lists of nearby proposed wind farms, which is the closest wind farm applications, were consulted and compared to Hugo WEF.

We value local knowledge and discussing the bat situation with people who are familiar with the area and seasonal changes, this could provide valuable knowledge and input into the process. Therefore, interviews were conducted with the landowners staying permanently on the farm.

### Passive Acoustic Monitoring Systems

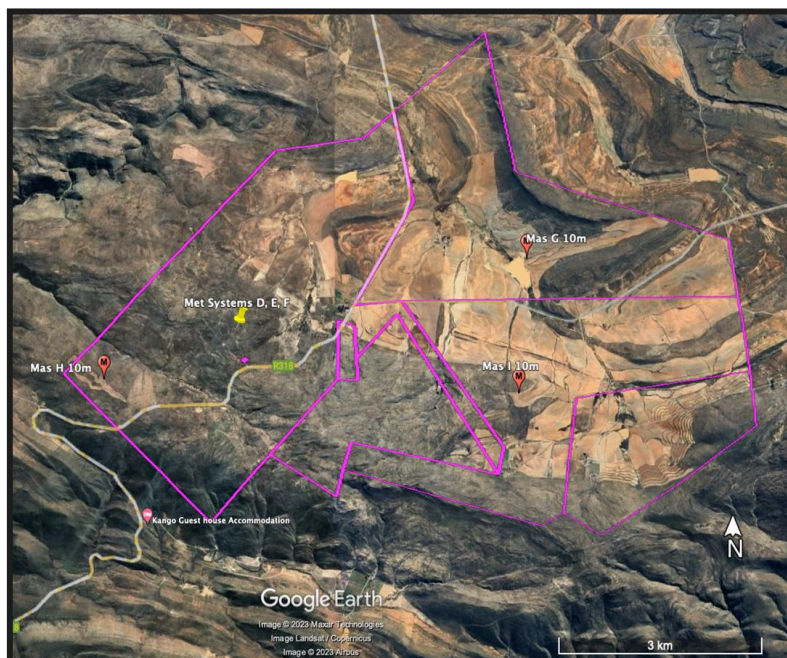
The monitoring systems consisted of six Wildlife Acoustics SM4BAT full spectrum bat detectors that were powered by 12V, 7Amp-h sealed lead acid batteries replenished by photovoltaic solar panels. Two SanDisk memory cards, class 10 speed, with a capacity of 64 Gigabyte (GB) or 128 GB each, were utilised within each detector to ensure substantial memory space with high-quality recordings, even under conditions of multiple false environmental triggers.

Each detector was set to operate in continuous trigger mode from dusk each evening until dawn. Times were correlated with latitude and longitude and set to trigger half an hour before sunset and half an hour after sunrise. The trigger mode setting for the bat detectors, which record frequencies exceeding 16 kHz and -18 dB, was set to record for the duration of the sound and 1000 m/s after the sound ceased; this period is known as the trigger window.

The data from these recorders was downloaded over three to four-month intervals and analysed to provide an approximation of the bat frequency and species diversity that visit and inhabit the site during the periods of monitoring (refer to Volume II for summary of passive detectors deployed at the proposed Khoe WEF).

The positions of temporary bat monitoring masts were selected based on: the representation of different biotopes, proximity to possible bat conducive areas, and accessibility to install a mast and download data. Locations of the monitoring systems shown in Figure 4-3 and motivation for the locations of these are discussed in Volume II – Bat Specialist Report, Section 3.3.

FIGURE 4-3 LOCATION OF BAT MONITORING SYSTEMS



### Roost Surveys

Roost surveys were conducted when the bat specialist visited the site. While areas, where possible roosts could be situated, were investigated, all roosting areas are not accessible as bats sometimes roost in crevices or roofs with limited ceiling space. When day roosts are identified, bat counts are conducted at sunset and if deemed necessary, detectors are installed for short periods at point sources to monitor roosts. It should be noted that the site is large and roost searches are concentrated in areas where one would expect bats to roost. Within the 14-months and limitations of the bat monitoring study no day roosts were discovered.

### Point Sources

A SM4BAT full spectrum recorder was used during point sources, where the detector was placed for one night at a place where there is expected to be optimum bat activity.

### Data Analysis

Data were downloaded manually approximately once every three to four months. Acoustic files downloaded from the detectors were analysed for bat activity and possible bat species. Wildlife Acoustics Kaleidoscope 5.4.3 was used for analysing large quantities of data. In cases where there was uncertainty about the details of a call, but it was clear that it was a bat call, the call was classified as Unclear.

### Various Sources of Information

Various sources of information have been used to compile inform the Bat Assessment Report. Source of information is further discussed in Volume II, Section 3.3.4.

#### 4.2.9 SOCIO-ECONOMIC

The approach to the SIA study is based on the Western Cape Department of Environmental Affairs and Development Planning Guidelines for Social Impact Assessment (February 2007). These guidelines are based on international best practice. The key activities in the SIA process embodied in the guidelines include:

- Describing and obtaining an understanding of the proposed intervention (type, scale, and location), the settlements, and communities likely to be affected by the proposed project.
- Collecting baseline data on the current social and economic environment.
- Identifying the key potential social issues associated with the proposed project. This requires a site visit to the area and consultation with affected individuals and communities. As part of the process a basic information document was prepared and made available to key interested and affected parties. The aim of the document was to inform the affected parties of the nature and activities associated with the construction and operation of the proposed development to enable them to better understand and comment on the potential social issues and impacts.
- Assessing and documenting the significance of social impacts associated with the proposed intervention.
- Identifying alternatives and mitigation measures.

In this regard the study involved:

- Review of socio-economic data for the study area.
- Review of relevant planning and policy frameworks for the area.
- Review of information from similar studies, including the SIAs undertaken for other renewable energy projects.
- Site visit and interviews with key stakeholders.
- Identifying the key potential social issues associated with the proposed project.
- Assessing the significance of social impacts associated with the proposed project.

Identification of enhancement and mitigation measures aimed at maximizing opportunities and avoiding and or reducing negative impacts.

#### 4.2.10 HERITAGE, ARCHAEOLOGY

A desk-based review of available literature was carried out prior to the field survey to assess the general heritage context into which the development would be set. Maps and aerial photographs were sourced from Google Earth and Geo-spatial Information applications. Background data specific to the site were sourced from the South African Heritage Resources Information System (SAHRIS). Data was also collected via a field survey by two archaeologists subjected to a detailed foot survey between 8 and 11 April 2024.

#### 4.2.11 PALEONTOLOGY

A PIA was commissioned from Dr Marion Bamford of the University of the Witwatersrand as part of the HIA. The PIA has been included in Volume II.

The PIA comprised a desktop review of relevant paleontological and geological mapping for the area and the relevant sheet explanations.



Relevant literature, paleontological databases, and published and unpublished records were consulted to determine the likelihood of fossils occurring in the affected area. Sources included records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases.

The desktop study was used to determine the impact significance of the Khoe WEF on paleontological resources.

#### 4.2.12 VISUAL/LANDSCAPE

The study was undertaken using Geographical Information Systems (GIS) software as a tool to generate viewshed analyses and to apply relevant spatial criteria to the proposed facility. A detailed Digital Terrain Model (DTM) for the study area was created from topographical data provided by NASA in the form of a 30 m SRTM (Shuttle Radar Topography Mission) elevation model.

The following VIA-specific tasks have been undertaken:

##### **Determine potential visual exposure**

The visibility or visual exposure of any structure or activity is the point of departure for the visual impact assessment. It stands to reason that if (or where) the proposed facility and associated infrastructure were not visible, no impact would occur.

The viewshed analyses of the proposed facility and the related infrastructure are based on a 30 m SRTM digital terrain model of the study area.

The first step in determining the visual impact of the proposed facility is to identify the areas from which the structures would be visible. The type of structures, the dimensions, the extent of operations and their support infrastructure are taken into account.

##### **Determine visual distance/observer proximity to the facility**

In order to refine the visual exposure of the facility on surrounding areas/receptors, the principle of reduced impact over distance is applied in order to determine the core area of visual influence for this type of structure.

Proximity radii for the proposed infrastructure are created in order to indicate the scale and viewing distance of the facility and to determine the prominence of the structures in relation to their environment.

The visual distance theory and the observer's proximity to the facility are closely related, and especially relevant, when considered from areas with a high viewer incidence and a predominantly negative visual perception of the proposed facility.

##### **Determine viewer incidence/viewer perception (sensitive visual receptors)**

The next layer of information is the identification of areas of high viewer incidence (i.e. main roads, residential areas, settlements, etc.) that would be exposed to the project infrastructure.

This is done in order to focus the attention on areas where the perceived visual impact of the facility will be the highest and where the perception of affected observers will be negative.

Related to this dataset, is a land use character map, that further aids in identifying sensitive areas and possible critical features (i.e. tourist facilities, national parks, etc. – if applicable), that should be addressed.

**Determine the visual absorption capacity (VAC) of the landscape**

This is the capacity of the receiving environment to absorb the potential visual impact of the proposed facility. The VAC is primarily a function of the vegetation, and will be high if the vegetation is tall, dense and continuous. Conversely, low growing sparse and patchy vegetation will have a low VAC.

The VAC would also be high where the environment can readily absorb the structure in terms of texture, colour, form and light / shade characteristics of the structure. On the other hand, the VAC for a structure contrasting markedly with one or more of the characteristics of the environment would be low.

The VAC also generally increases with distance, where discernible detail in visual characteristics of both environment and structure decreases.

**Calculate the visual impact index**

The results of the above analyses are merged in order to determine the areas of likely visual impact and where the viewer perception would be negative. An area with short distance visual exposure to the proposed infrastructure, a high viewer incidence and a predominantly negative perception would therefore have a higher value (greater impact) on the index. This focusses the attention to the critical areas of potential impact and determines the potential magnitude of the visual impact.

GIS software will be used to perform all the analyses and to overlay relevant geographical data sets in order to generate a visual impact index.

**Determine impact significance**

The potential visual impacts are quantified in their respective geographical locations in order to determine the significance of the anticipated impact on identified receptors. Significance is determined as a function of extent, duration, magnitude (derived from the visual impact index) and probability. Potential cumulative and residual visual impacts are also addressed. The results of this section is displayed in impact tables and summarised in an impact statement.

**Propose mitigation measures**

The preferred alternative (or a possible permutation of the alternatives) will be based on its potential to reduce the visual impact. Additional general mitigation measures will be proposed in terms of the planning, construction, operation and decommissioning phases of the project.

**Reporting and map display**

All the data categories, used to calculate the visual impact index, and the results of the analyses will be displayed as maps in the accompanying report. The methodology of the analyses, the results of the visual impact assessment and the conclusion of the assessment will be addressed in this VIA report.

**Site visit and photo simulations**

A site visit was undertaken on the 6<sup>th</sup> September 2023 in order to verify the results of the spatial analyses and to identify any additional site-specific issues that may need to be addressed in the VIA report. It should be noted that, from a visual perspective, the different seasons do not influence the results of the impact assessment, and as such regardless of the timing of the site visit, the level of confidence for the assessment and findings is high.

Photographs from strategic viewpoints were taken in order to simulate realistic post construction views of the WEF. This aids in visualising the perceived visual impact of the proposed WEF and place it in spatial context.

#### 4.2.13 TRAFFIC AND TRANSPORTATION

- Evaluate the impacts of additional traffic generated by the proposed development on the existing road network in the immediate vicinity of the development;
- Determine the specific traffic needs during different phases of implementation, namely construction and installation, decommissioning and operation;
- Evaluate intersection capacity of the road network and recommend mitigation measures;
- Evaluate site access requirements (including site distance assessment if required);
- Confirm the associated clearances required for the necessary equipment to be transported from the point of delivery to the proposed site based on information on equipment provided by the Client;
- Confirm transport requirements during construction, operation and maintenance;
- Provide a high-level transport plan for the transportation of equipment to site; and
- Determine (Abnormal) Permit requirements, if any

### 4.3 IDENTIFICATION OF POTENTIAL IMPACTS

The identification of potential impacts covers the three phases of the proposed development: construction, operation and decommissioning. During each phase, the potential environmental impacts may be different. For example, during the construction phase, traffic volumes are far greater than during the operational life of a WEF.

The project team has experience from environmental studies for other projects in the locality of the proposed development. The team is, therefore, able to identify potential impacts addressed in the EIA based on their experience and knowledge of the type of development proposed and the local area. Their inputs inform the scope for the S&EIA process.

Each specialist assessment considered:

- The extent of the impact (local, regional or (inter) national);
- The intensity of the impact (low, medium or high);
- The duration of the impact and its reversibility;
- The probability of the impact occurring (improbable, possible, probable or definite);
- The confidence in the assessment; and
- Cumulative impacts.

Following identification of potential environmental impacts, the baseline information was used to predict changes to existing conditions and undertake an assessment of the impacts associated with these changes.

#### 4.3.1 ASSESSMENT OF POTENTIAL IMPACTS

The potential impact that the proposed development may have on each environmental receptor could be influenced by a combination of the sensitivity or importance of the receptor and the predicted degree of alteration from the baseline state (either beneficial or adverse).

Environmental sensitivity (or importance) may be categorised by a multitude of factors, such as the rarity of the species; transformation of natural landscapes or changes to soil quality and land use. The overall significance of a potential environmental impact is determined by the interaction of the above two factors (i.e. sensitivity/importance and predicted degree of alteration from the baseline).

A 7-step approach for the determination of significance of potential impacts was developed by ERM to align with the requirements of Appendix 3 of the EIA Regulations, 2014 (as amended). This 7-step approach was adapted from standard ranking metrics such as the Hacking Method, Crawford Method etc. and complies with the method provided in the EIA guideline document (GN 654 of 2010) and considers international EIA Regulatory reporting standards such as the newly amended European Environmental Impact Assessment (EIA) Directive (2014/52/EU).

Specialists, in their terms of references, were supplied with this standard method with which to determine the significance of impacts to ensure objective assessment and evaluation, while enabling easier multidisciplinary decision-making.

The approach is both objective and scientific based to allow appointed specialists and EAPs to retain independence throughout the assessment process.

The 7-Step approach for determining the significance of impacts pre, and post mitigation, is described below:

**Step 1:** Predict potential impacts by means of an appraisal of:

- Site Surveys;
- Project-related components and infrastructure;
- Activities related with the project life-cycle;
- The nature and profile of the receiving environment and potential sensitive environmental features and attributes;
- Input received during public participation from all stakeholders; and
- The relevant legal framework applicable to the proposed development

**Step 2:** Determination of whether the potential impacts identified in **Step 1** will be *direct* (caused by construction, operation, decommissioning or maintenance activities on the proposed development site or immediate surroundings of the site), *indirect* (not immediately observable or do not occur on the proposed development site or immediate surroundings of the site), *residual* (those impacts which remain after post mitigation) and *cumulative* (the combined impact of the project when considered in conjunction with similar projects in proximity).

**Step 3:** Description and determination of the significance of the predicted impacts in terms of the criteria below to ensure a consistent and systematic basis for the decision-making process. Significance is numerically quantified on the basis score of the following impact parameters:

**Extent** ® of the impact: The geographical extent of the impact on a given environmental receptor.

**Duration (D)** of the impact: The length of permanence of the impact on the environmental receptor.

**Reversibility** ® of the impact: The ability of the environmental receptor to rehabilitate or restore after the activity has caused environmental change

**Magnitude (M)** of the impact: The degree of alteration of the affected environmental receptor.

**Probability (P)** of the impact: The likelihood of the impact actually occurring.

A widely accepted numerical quantification of significance is the formula:

$$S=(E+D+R+M)*P$$

Where: *Significance*=(*Extent+Duration+Reversibility+Magnitude*)\**Probability*

The following has also been considered when determining the significance of a potential impact.

**Nature (N)** of the impact: A description of what causes the effect, what will be affected, and how it will be affected.

**Status (S)** of the impact: described as either positive, negative or neutral

#### Cumulative impacts.

Inclusion of **Public comment**.

The significance of environmental impacts is determined and ranked by considering the criteria presented in Table 4-2 below. All criteria are rank according to 'Very Low', 'Low', 'Moderate', 'High' and 'Very High' and are assigned scores of 1 to 5 respectively.

TABLE 4-2 DEFINING THE SIGNIFICANT IN TERMS OF THE IMPACT CRITERIA.

Impact Criteria	Definition	Score	Criteria Description
<b>Extent (E)</b>	Site	1	Impact is on the site only
	Local	2	Impact is localized inside the activity area
	Regional	3	Impact is localized outside the activity area
	National	4	Widespread impact beyond site boundary. May be defined in various ways, e.g. cadastral, catchment, topographic
	International	5	Impact widespread far beyond site boundary. Nationally or beyond
<b>Duration (D)</b>	Immediate	1	On impact only
	Short term	2	Quickly reversible, less than project life. Usually up to 5 years.
	Medium term	3	Reversible over time. Usually between 5 and 15 years.
	Long term	4	Longer than 10 years. Usually for the project life.
	Permanent	5	Indefinite
<b>Magnitude (M)</b>	Very Low	1	No impact on processes
	Low	2	Qualitative: Minor deterioration, nuisance or irritation, minor change in species/habitat/diversity or resource, no or very little quality deterioration.
	Moderate	3	Quantitative: No measurable change; Recommended level will never be exceeded.

Impact Criteria	Definition	Score	Criteria Description
	High	4	Qualitative: Moderate deterioration, discomfort, Partial loss of habitat /biodiversity /resource or slight or alteration.
	Very High	5	Quantitative: Measurable deterioration; Recommended level will occasionally be exceeded.
<b>Reversibility (R)</b>	Reversible	1	Qualitative: Substantial deterioration death, illness or injury, loss of habitat /diversity or resource, severe alteration, or disturbance of important processes.
	Recoverable	3	Quantitative: Measurable deterioration; Recommended level will often be exceeded (e.g. pollution)
	Irreversible	5	Permanent cessation of processes
<b>Probability (P)</b>	Improbable	1	Recovery which does not require rehabilitation and/or mitigation.
	Low Probability	2	Recovery which does require rehabilitation and/or mitigation.
	Probable	3	Not possible, despite action. The impact will still persist, and no mitigation will remedy or reverse the impact.
	Highly Probable	4	Not likely at all. No known risk or vulnerability to natural or induced hazards
	Definite	5	Unlikely; low likelihood; Seldom; low risk or vulnerability to natural or induced hazards

The significance (s) of potential impacts identified according to the criteria above has been colour coded for the purpose of comparison. This colour coding will be used in impact tables.

Significance is deemed Negative (-)			Significance is deemed Positive (+)		
0 – 30	31 – 60	61 – 100	0 – 30	31 – 60	61 – 100
Low	Moderate	High	Low	Moderate	High

**Step 4:** Determination of practical and reasonable mitigation measures based on specialists' inputs and field observations following the mitigation hierarchy (avoid, minimise, manage, mitigate, or rehabilitate).

**Step 5:** Evaluation of predicted residual impacts after implementation of mitigation measures.

**Step 6:** Determination of the significance of the impact taking into consideration the predicted residual impacts after implementation of mitigation measures.

**Step 7:** Based on an acceptable significance of the impact, determination of the need and desirability of the proposed development and an opinion as to whether the development should proceed or not.

The Assessment of the significance of potential impacts is then populated in an Impact Summary Table, see Section 10 and Section 11 of this Report for the specialists' impact assessments.

#### 4.3.2 MITIGATION

The EIA proposes measures to avoid, reduce or remedy significant adverse impacts which were identified; these are termed mitigation measures. Where the assessment process identified any significant adverse impacts, mitigation measures were proposed to reduce those impacts where practicable. Such measures include the physical design evolutions such as movement of turbines and management and operational measures. Design alterations such as relocating turbines to avoid certain sensitive receptors are mitigation embedded into the design of the proposed development, i.e., embedded mitigation.

This strategy of avoidance, reduction and remediation is a hierarchical one which seeks:

- First to avoid potential impacts;
- Then to reduce those which remain; and
- Lastly, where no other measures are possible, to propose compensatory measures.

Each specialist consultant identified appropriate mitigation and enhancement measures (where relevant).

#### 4.3.3 CUMULATIVE IMPACT ASSESSMENT

In accordance with the EIA Regulations, consideration is also given to 'cumulative impacts'.

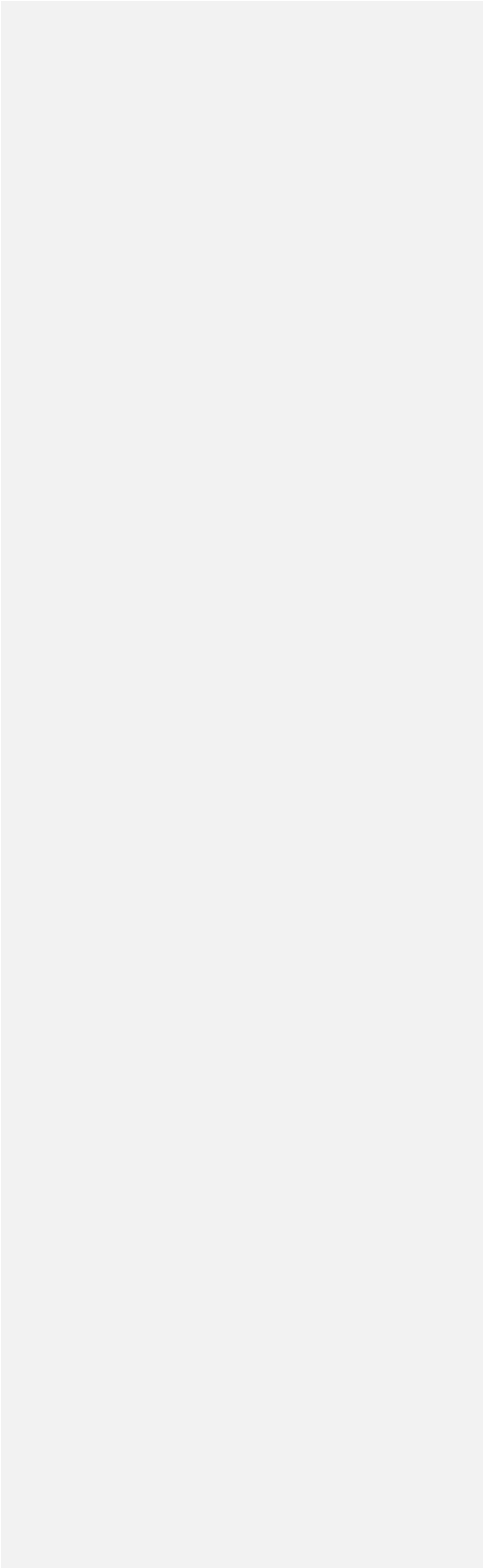
Cumulative impacts are those that result from incremental changes caused by past, present or reasonably foreseeable future actions together with the proposed development. Cumulative impacts are the combined impacts of several developments that are different to the impacts from the developments on an individual basis. For example, the landscape impact of one WEF may be insignificant, but when combined with another it may become significant.

For this assessment cumulative impacts are defined and will be assessed in the future baseline scenario, i.e., cumulative impact of the proposed development = change caused by proposed development when added to the cumulative baseline. The cumulative baseline includes all other identified developments. In the cumulative assessment the effect of adding the proposed development to the cumulative baseline is assessed.

In line with best practice, the scope of this assessment has included all operational, approved or current and planned renewable energy applications (including those sites under appeal), within a 30 km radius of the site. Therefore, all potential projects are included, even though it is unknown how many of these will be constructed.

Renewable energy sites included for cumulative impact assessment are based on the knowledge and status of the surrounding areas at the time of the specialists compiling their assessments, these have been updated as applicable through the EIA process.

A preliminary assessment of cumulative impacts has been made in the Scoping Phase and has been assessed further in this EIA Phase (Section 11).





## 5. NEED AND DESIRABILITY

Reference is made to the DFFE 2017 Guideline on Need and Desirability which states that while the “concept of need and desirability relates to the type of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which need refers to time and desirability to place – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to wise use of land – i.e. the question of what is the most sustainable use of land.”

The Need and Desirability of the proposed development has been considered in terms of the regional location and the project’s cumulative impact. The guidelines pose questions that should be considered in this investigation, which are addressed in the Table 5-1 and Table 5-2 below.

**TABLE 5-1 ECOLOGICAL CONSIDERATIONS OF NEED AND DESIRABILITY FOR THE KHOE WEF**

<b>"securing ecological sustainable development and use of natural resources"<sup>39</sup></b>			
Question	Answer	Reference	
<i>How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?</i>	Through effective implementation of suggested mitigation and avoidance measures, it is unlikely that the development of the Khoe Wind Energy Facility would significantly compromise the long-term ecological integrity and associated ecosystem services of the site.	Volume II: Terrestrial Biodiversity Impact Assessment	
<i>How were the following ecological integrity considerations taken into account?</i>	<i>Threatened Ecosystems</i>	The proposed development area includes no threatened ecosystems as verified through the IUCN Red List of Ecosystems conservation tool.	Volume II: Terrestrial Biodiversity Impact Assessment
	<i>Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure</i>	An ecological sensitivity map of the site was produced by integrating information collected on-site with available ecological and biodiversity information. Sensitive features such as wetlands, drainage lines, water bodies, steep slopes and rocky outcrops were mapped and appropriately buffered. The proposed layout avoids all high-sensitive areas.	Volume II: Terrestrial Biodiversity Impact Assessment, Aquatic Impact Assessment, Bat Impact Assessment, Avifaunal Impact Assessment, Faunal Impact Assessment
	<i>Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs")</i>	The majority of the Very High Sensitivity area falls within Ecological Support Area (ESA) of Tier one (1), followed by Tier two (2) and finally small areas of CBA. The Western Cape Biodiversity Spatial Plan (WCBSP) Handbook defines ESAs as areas that are not essential for meeting biodiversity targets but play an important role in supporting the functioning of Protected Areas (PAs) and / or Critical Biodiversity Areas (CBAs), and are often vital for delivering ecosystem services. Ecological Support Areas (ESAs) support landscape connectivity, encompass the ecological infrastructure from which ecosystem goods and services flow, and strengthen resilience to climate change. The WCBSP Handbook furthermore distinguishes between ESAs 1, which are areas considered to be functional, in a natural or near-natural state or only	Volume II: Terrestrial Biodiversity Impact Assessment

<sup>39</sup>Section 24 of The Constitution of South Africa refers.

**“securing ecological sustainable development and use of natural resources”<sup>739</sup>**

	<p>moderately degraded, and ESAs 2 which are considered severely degraded or have no natural cover remaining and therefore require restoration. Ecological Support Areas (ESAs) include features such as regional climate adaptation corridors, water source and recharge areas, riparian habitat surrounding rivers or wetlands, and Endangered vegetation. The proposed PAOI falls within the Langeberg-West Catchment Area which is an important water recharge area which has triggered the Very High Sensitivity in the Terrestrial Biodiversity Theme as an ESA 1. In addition, several watercourses are marked for restoration from other land use.</p>	
<i>Conservation targets</i>	<p>The PAOI does not intersect with any NPAESs. There are no specific features of very high biodiversity value within the affected polygons and highly sensitive areas have been avoided for development. In addition, the site does not appear to fall on any significant gradients or corridors that are likely to be of high importance for biodiversity processes such as migration and faunal movement.</p>	Volume II: Terrestrial Biodiversity Impact Assessment
<i>Ecological drivers of the ecosystem</i>	<p>Transformation of intact habitat on a cumulative basis would contribute to the fragmentation of the landscape and would potentially disrupt the connectivity of the landscape for fauna and flora and impair their ability to respond to environmental fluctuations. Due to the presence of several other renewable energy developments (primarily solar developments which are more invasive in vegetation clearing) in the area, this is a potential cumulative impact of the development that is assessed.</p>	Volume II: Terrestrial Biodiversity Impact Assessment
<i>Environmental Management Framework</i>	<p>The proposed Khoe WEF complies with all policies and planning tools and has no intersections with EMFs or with any development zones according to the DFFE screening tool report.</p>	n/a
<i>Spatial Development Framework</i>	<p>The Langeberg Spatial Development Framework Vision is in support of Langeberg IDP vision: “To create a safe and healthy environment for delivering sustainable quality services” (IDP, 2022).</p> <p>The SDF notes that to attain this vision, the overall goal or mission is:</p> <ul style="list-style-type: none"> <li>To promote conservation and tourism in the Gouritz Cluster Biosphere, Rivieronderend Mountain Catchment Area, Langeberg West Mountain Catchment Area (including Dassieshoek, Montagu Mountain and Twisniet Nature Reserve), Matroosberg Management Catchment Area and Provincial Nature Reserves (Anysberg Nature Reserve and Vrolijkheid Nature Reserve) and Private Nature Reserves including Goedemoed, Skuilkrans and Mont Eco Nature Reserve.</li> </ul>	Volume II: Social Impact Assessment

<b>"securing ecological sustainable development and use of natural resources"<sup>39</sup></b>		
	<ul style="list-style-type: none"> <li>To enhance and intensify agriculture specifically in the Breede, Keisie and Koo Valleys.</li> <li>To strengthen sense of place of Langeberg settlements, rural areas, and scenic routes.</li> </ul> <p>A SWOT analysis was undertaken as part of the SDF process.</p>	
<i>Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.)</i>	<p>All global responsibilities to which South Africa is signatory or party to were assessed within this report. Applicable international treaties and conventions are:</p> <ul style="list-style-type: none"> <li>UNFCCC Paris Agreement (2016)</li> <li>The Equator Principles III (2020)</li> <li>The Convention on Biological Diversity (CBD) (1993)</li> <li>The Convention on the Conservation of Migratory Species of Wild Animals (CMS or Bonn Convention) (1983)</li> <li>The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) (1999)</li> </ul> <p>The proposed development complies with all international responsibilities.</p>	n/a
<i>How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i>	<p>The proposed development can disturb listed plant species and vegetation from clearing of the development footprint, soil erosion and alien plant invasion. Increased levels of pollution, noise, disturbance and human presence can impact negatively on faunal communities. Biodiversity value and ecological functioning of the proposed development area are potentially affected by the development.</p> <p>As part of the EIA process specialist studies were conducted to identify areas most environmentally suitable for development within the proposed development site boundary. As a result of these studies a development layout has been produced that avoids sensitive areas and identified constraints.</p> <p>The specialists have proposed mitigation measures to further reduce residual risks or enhance opportunities during construction, operation and decommissioning phases of the development. With implementation of these mitigation measures, all identified negative impacts are expected to be reduced to acceptable levels of medium or low negative significance. All mitigation measures proposed by the specialists are included in the EMPr for the project.</p>	<p>Volume I App B: EMPr Volume II: Specialist reports</p>

<b>"securing ecological sustainable development and use of natural resources"<sup>39</sup></b>		
<i>How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i>	On a national level the development will lessen the country's dependency on coal, and contribute to lowering water consumption, pollution and environmental degradation per kW of electricity produced. The EMPr provides measures for avoidance and minimisation of pollution, as well as enhancing any potential positive impacts.	Volume I App B: EMPr
<i>What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?</i>	The generation of waste will largely be restricted to the construction phase of the project and consist of normal construction phase solid waste streams. The EMPr will detail specific mitigation measures that must be implemented for the appropriate management and minimisation of waste, during all phases of the project.  Registered service providers will be utilised to transport solid waste to registered landfills.	Volume I App B: EMPr
<i>How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i>	A Heritage Impact Assessment and a Visual Impact Assessment were conducted to assess the proposed layout. Comment from the relevant heritage authority has been sought.  Mitigation measures have been identified by the heritage specialists to minimise and remedy residual impacts and enhance positive impacts.  Although the site has been classified as fatally flawed from a visual perspective, the turbines were placed in locations with optimal wind resource potential and if they are to be removed or relocated, the entire project would be jeopardized.	Volume II: Heritage Impact Assessment & Visual Impact Assessment
<i>How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including</i>	Wind is a renewable resource and will be the 'fuel' for the WEF to generate electricity. Therefore, the development will have a minimal impact on non-renewable resources.	n/a

<b>"securing ecological sustainable development and use of natural resources"<sup>39</sup></b>				
<i>offsetting) the impacts? What measures were explored to enhance positive impacts?</i>				
<i>How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What</i>		<p>The WEF will use the renewable energy resource of wind to generate power. Construction of the WEF will require use of water, a renewable natural resource.</p> <p>Operation of the WEF will consume relatively small quantities of water when compared to alternative energy technologies such as coal. Impacts on the ecosystem caused by use of these renewable energy resources has been evaluated.</p>	n/a	
	<i>Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)</i>		<p>The proposed WEF will reduce South Africa's dependency on non-renewable resources, particularly coal, as an energy source.</p> <p>Wind as an energy source is not dependent on water, as compared to the massive water requirements of conventional power stations, has a limited footprint and does not impact on large tracts of land, and poses limited pollution and health risks, specifically when compared to coal and nuclear energy plants.</p>	n/a
	<i>Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more</i>		<p>The current land use is low-intensity grazing and the land is not suitable for other agricultural uses.</p> <p>The proposed development will increase yield as the landowners will be paid for the use of their land. This will improve cash flow and financial sustainability of farming enterprises on site.</p>	Volume II: Agricultural Impact Assessment; Social Impact Assessment

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<p><i>measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?</i></p>	<p><i>important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources this the proposed development alternative?)</i></p>	<p>The proposed development itself will not cause a significant change in land use, as the development site is primarily low intensity agriculture (grazing), which can still proceed once the development is constructed. Wind is a renewable resource and a wind energy facility is the best use thereof.  Solar electricity generation would require a much greater infrastructure footprint to generate the equivalent energy of the proposed WEF.</p>	
	<p><i>Do the proposed location, type and scale of development promote a reduced dependency on resources?</i></p>	<p>The proposed WEF is predicted to reduce dependency on coal as an energy source.  Wind as an energy source is not dependent on water, as compared to the massive water requirements of conventional coal fired power stations, has a limited footprint and does not impact on large tracts of land, and poses limited pollution and health risks, specifically when compared to coal and nuclear energy plants.</p>	<p>n/a</p>
<p><i>How were a risk-averse and cautious approach applied in terms of ecological impacts?</i></p>	<p><i>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</i></p>	<p>For the current Flora assessment, sampling took place in the autumn season, and conditions were relatively dry during the site visit. Most of the vegetation across the site was relatively dry and in a dormant state. As a result, some plant species were not visible at the time and only the lists of the perennial species are considered reliable. While this poses some limitations for the study, the different habitats present could still be easily discerned based on the vegetation present and this is not likely to significantly affect the sensitivity mapping of the site or the characterisation of the plant communities present. To limit the gaps in the Flora assessment, the detailed site visits were done in conjunction with a desktop study.  Many fauna are difficult to observe in the field and their potential presence at a site must be evaluated based on the literature and available databases. However, many remote areas have not been well-sampled with the result that the species lists derived for such areas do not always adequately reflect the actual fauna present. In order to reduce this limitation, and ensure a conservative approach, the species lists derived for the site from the literature were obtained from an area significantly larger than the study site and are likely to include a much wider array of species than actually occur at the site.  In addition, the camera trapping that was conducted at the site provides a reliable baseline and an actual indication of the fauna present and their</p>	<p>Volume II: Fauna and Flora Impact Assessment</p>

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		levels of activity and distribution across the site. This is considered to be a cautious and conservative approach to the assessment and is considered significantly more reliable and robust than relying on available information alone, especially for such a poorly known area. Through camera trapping, Riverine Rabbit was also identified to be present on the site.	
	<i>What is the level of risk associated with the limits of current knowledge?</i>	The risk associated with assumptions and limits of current knowledge is the potential for information being assessed to be incorrect. This would translate to erroneous impact identification and mitigation measures. However, due to the amount of site work conducted the risk associated with this is considered to be low.	n/a
	<i>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</i>	To counter the likelihood that the area has not been well sampled in the past and in order to ensure a conservative approach, the species lists derived for the site from the literature were obtained from an area significantly larger than the study area and are likely to include a much wider array of species than actually occur at the site. This is a cautious and conservative approach which takes the study limitations into account. The precautionary approach has been adopted for this study, i.e. assuming the worst-case scenario will occur and then identifying ways to mitigate or manage these impacts.	Volume II: Terrestrial Biodiversity Impact Assessment
<i>How will the ecological impacts resulting from this development impact on people’s environmental right in terms following:</i>	<i>Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</i>	<p>Impacts on people’s rights have been identified and assessed by the social specialist, visual specialist and noise specialist.</p> <p>Although the site has been classified as fatally flawed from a visual perspective, the turbines were placed in locations with optimal wind resource potential and if they are to be removed or relocated, the entire project would be jeopardized.</p> <p>The significance of the potential negative health risks posed by the development (noise, shadow flicker, electromagnetic radiation) is expected to be moderate to low.</p> <p>The noise impact assessment found the level of noise impacts for the Khoe WEF are expected to be of low significance with mitigation.</p> <p>The operational impact on the sense of place is expected to be of low negative significance with or without mitigation.</p>	Volume II: Visual Impact Assessment; Social Impact Assessment; Noise Impact Assessment



"securing ecological sustainable development and use of natural resources" <sup>39</sup>		
<i>Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?</i>	Renewable energy has fewer negative health effects than other forms of non-renewable energy generation and will have overall positive health benefits.	Volume II: Social Assessment      Impact
<i>Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?</i>	The SIA conducted for the proposed Khoe WEF indicates that during the construction and the operational phase of the proposed development project, various employment opportunities, with different levels of skills will be created. In addition, this will also create local business opportunities benefitting the socio-economic development of the local communities. The proposed development also represents an investment in clean, renewable energy infrastructure, which, given the negative environmental and socio-economic impacts associated with a coal-based energy economy and the challenges created by climate change, represents a significant positive social benefit for society as a whole.	Volume II: Social Assessment      Impact
<i>Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?</i>	The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance.	Volume II: Specialist Reports
<i>Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?</i>	Iterative specialists' constraints mapping identified the most suitable areas for development for which a development layout was then produced for assessment. The results of the specialist's studies further informed the development of the preferred layout.	Volume II: Specialist Reports
<i>Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?</i>	The cumulative impacts assessed for terrestrial biodiversity is the broad-scale change in ecological processes due to vegetation clearing impacts in the broader area. Within 30 km of the development, roughly five solar Photovoltaic developments are under consideration. Solar PV developments are more invasive in vegetation clearing and this impact can create habitat fragmentation in the broader area, as well as put species of conservation	Volume II: Terrestrial Biodiversity Impact Assessment

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	concern at risk. This potential impact will be minimized through active collaboration with the various developments in the area.	

TABLE 5-2 SOCIO-ECONOMIC CONSIDERATIONS OF NEED AND DESIRABILITY FOR THE KHOE WEF

<b>"Promoting justifiable economic and social development"<sup>40</sup></b>			
<b>Question</b>		<b>Answer</b>	<b>Reference</b>
What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area,	<p><b>Langeberg Municipality Integrated Development Plan</b></p> <p>The vision for the Langeberg Municipality (LM) as set out in the IDP is "to create a safe and healthy environment for delivering sustainable quality services". The mission statement that underpins the vision is "An efficient and cost-effective municipality for good governance, sustainable services, safe and secure environment, sound financial management and a conducive environment for local economic development".</p> <p>The IDP lists five strategic objectives (SOs), namely:</p> <ul style="list-style-type: none"> <li>• SO1: Ensure efficient administration for good governance.</li> <li>• SO2: Provide infrastructure for sustainable and affordable basic services.</li> <li>• SO3: Promote a safe and secure environment.</li> <li>• SO4: Promote and facilitate investment and local economic development.</li> <li>• SO5: Provide sustainable financial management.</li> </ul> <p><b>Western Cape Infrastructure Plan</b></p> <p>The Western Cape Infrastructure Framework (WCIF) (2013) was developed by the WCP Provincial Department of Transport and Public Works in terms of the Provincial Government's mandate to coordinate provincial planning under Schedule 5A of the Constitution. The objective of the WCIF is to align the planning, delivery and management of infrastructure to the strategic agenda</p>	Volume III; Social Impact Assessment

<sup>40</sup>Section 24 of The Constitution of South Africa refers.

**"Promoting justifiable economic and social development"<sup>40</sup>**

	<p>and vision for the province, as outlined in the 2009-2014 Draft Provincial Strategic Plan. The One Cape 2040 and 2013 Green is Smart strategy were other key informants.</p> <p>The document notes that given the status quo of infrastructure in the province, and the changing and uncertain world facing the Western Cape over the 2-3 decades a new approach to infrastructure is needed. Namely one that satisfies current needs and backlogs, maintains the existing infrastructure, and plans proactively for a desired future outcome. The 2040 vision requires a number of transitions to shift fundamentally the way in which infrastructure is provided and the type of infrastructure provided in WCP.</p> <p>The WCIF addresses new infrastructure development under five major 'systems' (themes), and outlines priorities for each. Energy is one of the 'systems' identified. The document notes that a provincial demand increase of 3% per year is anticipated for the period 2012-2040. Key priorities are in matching energy generation/ sourcing with the demand needed for WCP economic growth. Additionally, the energy focus should be on lowering the provincial carbon footprint, with an emphasis on renewable and locally generated energy.</p> <p>Three key transitions are identified for the WCP Energy 'system' infrastructure, namely:</p> <ul style="list-style-type: none"> <li>• Shifting transport patterns to reduce reliance on liquid fuels.</li> <li>• Promoting natural gas as a transition fuel by introducing gas processing and transport infrastructure.</li> <li>• Promoting the development of renewable energy plants in the province and associated manufacturing capacity.</li> </ul>	
<p><i>Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),</i></p>	<p>The current land use is primarily used for agriculture, with no other land use planned or occurring. No tourism or commercial hunting is associated with any of the site properties.</p> <p><b>Western Cape Green Economy Strategy Framework</b>                  The Western Cape Green Economy Strategy (2013) - 'Green is Smart' - is a framework for shifting the Western Cape economy from its current carbon intensive and resource-wasteful path within a context of high levels of poverty to one which is smarter, greener, more competitive, and more</p>	

**“Promoting justifiable economic and social development”<sup>40</sup>**

equitable and inclusive. The Strategy is closely aligned with provincial development goals and the 2014 WCCCRS.

The Strategy’s point of departure is that while the WCP faces significant challenges in terms of climate change and economic development. Two of the WCP’s key economic sectors - both of national importance - agriculture and tourism, are vulnerable to climate change. At the same time, these challenges hold significant potential for opportunities linked to attracting investment, economic development, employment creation, and more resilient infrastructure and patterns of consumption. These opportunities are partly linked to the WCP’s existing leadership in some fields of green technology, including knowledge services.

The core objective of the Strategy is to position the WCP as the lowest carbon footprint province in South Africa, and a leading green economy hub on the African continent.

The Strategy framework is made up of 5 drivers of the green economy which are market focused and principally private sector driven and supported by 5 enablers which are either public sector driven, or the product of a collaborative effort.

The five drivers are: smart mobility, smart living and working, smart ecosystems, smart agri-processing and smart enterprise. The relevant cross-cutting enablers are: finance, rules and regulations, knowledge management, capabilities, and infrastructure.

The framework also identifies priorities that would position the WCP as a pioneer and early adopter of green economic activity. These priorities have been identified in terms of the WCP being firstly, a front-runner or pioneer and secondly, an early adopter of innovations and technologies which already exist but are not widely adopted in South Africa. Some priorities are considered game-changers and are singled out as ‘high level priorities for green growth’.

Three such ‘high level priorities for green growth’ are identified, two of which are of relevance here:

- Natural Gas and Renewables: Off-shore natural gas, potential gas baseload power plants and renewable energy IPP programme, together

**“Promoting justifiable economic and social development”<sup>40</sup>**

with a greenfield gas infrastructure, will be the game-changer for the Western Cape to be the lowest carbon province in South Africa, and achieve significant manufacturing investment.

- Green Jobs: A green growth path without job growth is unsustainable. There must be early pursuit of priorities with a high rate of job growth potential – notably rehabilitation of natural assets, responsible tourism and the waste sector.

‘Under the section dealing with drivers, renewable energy is discussed under ‘Smart Enterprise’. The WCP’s objective in terms of this driver is to establish the WCP as a globally recognized centre of green living, working, creativity, business, and investment, and thereby attract investment, business and employment opportunities. Based on existing comparative advantages, three key opportunities are identified, one of which is of relevance here, namely, to establish the WCP as Africa’s new energy servicing hub.

In this regard, the Strategy document notes that WCP is well placed to be the most important research and servicing hub for the renewable and natural gas energy sectors in South Africa and on the African continent. The Strategy also notes that there are important initial opportunities in the construction of new energy infrastructure. However, the real long-term benefits lie in the servicing of operational infrastructure. In this regard, it is estimated that the annual servicing and maintenance costs of WEFs for instance amount to approximately 10% of the initial capital investment.

Public and market sector procurement are identified as some of the key enablers. The creation of a streamlined regulatory system – the reduction of ‘red tape’ – is identified as a key prerequisite for creating an enabling environment.

Under the section dealing with enablers necessary to unlock development potential, renewable energy is discussed under “Smart Infrastructure”. The Strategy document notes that existing infrastructure systems, particularly those relating to energy and transport, are carbon intensive, with high costs to the environment. Opportunities for the WCP are linked to tapping into infrastructural development funding by leveraging existing advantages.

With regard to the energy sector, the Strategy proposes that the WCP becomes an early adopter of natural gas processing and transport

**“Promoting justifiable economic and social development”<sup>40</sup>**

	<p>infrastructure and become the hub of Concentrated Solar manufacture and servicing. Natural gas is identified as the key potential ‘game changer’ of the WCP economy, and at present the best way to transition the economy to a more fully integrated renewables sector as major part of the WCP fuel mix in the long term. In this regard, the relative ease with which gas-fired stations could be activated make them an ideal supplement to less predictable wind and solar sources.</p> <p>Surprisingly, WEF and Solar PV manufacture and servicing receive no specific mention, while Concentrated Solar (CSP) does. The Strategy document justly notes that while the Northern Cape Province is the best suited for CSP facilities, the WCP has strong existing research capabilities in CSP at the University of Stellenbosch (US), and the WCP’s existing manufacturing sector already has the capacity to manufacture many CSP components.</p> <p>Potential opportunities of commercialisation of CSP technology for local (RSA, Africa) conditions based on US research could be substantial. This subsector is identified as an important area of collaboration between the two provinces to realise the potential benefits. The key action at this stage to initiate a WCP manufacturing and servicing centre is to lobby for support for a pilot of South African designed CSP technologies, adapted to SA conditions.</p>							
<p><i>Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and</i></p>	<p>The study area economy and land use are based on agriculture. Primary agriculture is however on the decline and is being replaced by lifestyle- and weekend farming, conservation, and nature-based tourism. Current agricultural activities are largely based on raising livestock, but also includes limited cropping. Sheep, goats, and cattle are kept.</p>							
<p><i>Municipal Economic Development Strategy (“LED Strategy”).</i></p>	<p>The IDP highlights the importance of prioritising infrastructure development as economic enabler for economic development. The importance to supporting SMMEs is also noted. The provision of energy infrastructure, such as the proposed renewable energy facility, supports this programme and will create opportunities to support SMMEs.</p>							
<p><i>Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?</i></p>	<p>Social impacts related to the construction phase:</p> <table border="1" data-bbox="667 1169 1449 1251"> <thead> <tr> <th data-bbox="667 1169 848 1251"><b>Impact</b></th> <th data-bbox="848 1169 1149 1251"><b>Significance No Mitigation/Enhancement</b></th> <th data-bbox="1149 1169 1449 1251"><b>Significance With Mitigation/Enhancement</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="667 1251 848 1272"></td> <td data-bbox="848 1251 1149 1272"></td> <td data-bbox="1149 1251 1449 1272"></td> </tr> </tbody> </table>	<b>Impact</b>	<b>Significance No Mitigation/Enhancement</b>	<b>Significance With Mitigation/Enhancement</b>				
<b>Impact</b>	<b>Significance No Mitigation/Enhancement</b>	<b>Significance With Mitigation/Enhancement</b>						

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<b>Creation of employment and business opportunities</b>	Medium (Positive)	Medium (Positive)
<b>Presence of construction workers and potential impacts on family structures and social networks</b>	Medium (Negative)	Low (Negative)
<b>Influx of job seekers</b>	Low (Negative)	Low (Negative)
<b>Safety risk, stock theft and damage to farm infrastructure associated with presence of construction workers</b>	Medium (Negative)	Low (Negative)
<b>Increased risk of grass fires</b>	Medium (Negative)	Low (Negative)
<b>Impact of heavy vehicles and construction activities</b>	Medium (Negative)	Low (Negative)
<b>Loss of farmland</b>	Medium (Negative)	Low (Negative)

Social impacts related to the operational phase:

<b>Impact</b>	<b>Significance No</b>	<b>Significance</b>
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	<b>Mitigation/Enhancement</b>	<b>With Mitigation/Enhancement</b>
<b>Establishment of infrastructure to improve energy security and support renewable sector</b>	Medium (Positive)	High (Positive)
<b>Creation of employment and business opportunities</b>	Low (Positive)	Medium (Positive)
<b>Generate income for local landowners</b>	Low (Positive)	High (Positive)
<b>Benefits associated with socio-economic contributions to community development</b>	Medium (Positive)	High (Positive)
<b>Visual impact on sense of place (VIA)</b>	Very High (Negative)	Very High (Negative)
<b>Visual impact and impact on sense of place (SIA)</b>	High (Negative)	High (Negative)
<b>Impact on property values of visually affected properties</b>	Medium (Negative)	Low (Negative)



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<b>Impact on tourism (affected properties)</b>	Medium (Negative)	Low (Negative)
<b>Impact on tourism: Region</b>	Low (Negative)	Low (Negative)

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 significant negative social cost.

Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?

The proposed development will contribute towards local economic development and skills development programs of the local and district municipality through the support and co-operation between public and private sectors, creation of employment and business opportunities, and the opportunity for skills development and on-site training during both construction and operation phases.

An important focus of the REIPPPP is to ensure that the build programme secures sustainable value for the country and enables local communities to benefit directly from the investments attracted into the area. In this regard Independent Power Producers (IPPs) are required to contribute a percentage of projected revenues accrued over the 20-year project operational life toward Socio-economic Development (SED) initiatives.

These contributions are linked to Community Trusts and accrue over the 20-year project operation life and are used to invest in housing and infrastructure as well as healthcare, education, and skills development. Community Trusts provide an opportunity to generate a steady revenue stream that is guaranteed for a 20-year period. This revenue can be used to fund development initiatives in the area and support the local community. The long-term duration of the revenue stream also allows local municipalities and communities to undertake long term planning for the area. The revenue

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		<p>from the proposed WEF can be used to support several social and economic initiatives in the area, including:                  Creation of jobs.                  Education.                  Support for and provision of basic services.                  School feeding schemes.                  Training and skills development.                  Support for SMME’s.</p>	
<p>How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?</p>		<p>The proposed development will contribute towards the local economic development strategies of the local and district municipality through the creation of employment and business opportunities, and the opportunity for skills development and on-site training during the construction, operation and decommissioning phase.</p> <p>The REIPPPP also contributes to Broad Based Black Economic Empowerment (BBBEE) and the creation of black industrialists. In this regard, Black South Africans own, on average, 34% of projects that have reached financial close (BW1-BW4), which is 4% higher than the 30% target. This includes black people in local communities that have ownership in the IPP projects that operate in or near their communities and represents the majority share of total South African Entity Participation.</p>	<p>Volume II: Social Impact Assessment</p>
<p>Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term? Will the impact be socially and economically sustainable in the short- and long-term?</p>		<p>Wind energy facilities are socially and economically sustainable in the short and long term. IPP projects require a minimum ownership of 2.5 % by local communities which represents a significant injection of capital into mainly rural areas of South Africa for the lifespan of the facility. In addition, local content minimum thresholds result in a substantial stimulus for establishing local manufacturing capacity.</p>	<p>Volume II: Social Impact Assessment</p>
<p><i>In terms of location, describe how the placement of the proposed development will:</i></p>	<p>result in the creation of residential and employment opportunities in close proximity to or integrated with each other,</p>	<p>The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities. Members from the local communities in the area, including De Doorns and Touws River, would be able to qualify for percentage of the low skilled and semi-skilled employment opportunities. Most of these employment opportunities will accrue to Historically Disadvantaged (HD) members of the community.</p> <p>The typical lifespan of WEFs is 20 to 25 years. During the operational phase there will be a significant decrease in employment opportunities. The</p>	<p>Volume II: Social Impact Assessment;</p>

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	<p>operational phase of the proposed project will create in the region of 20 full time employment opportunities during the operational phase.                      Typical employees that might be required include: Technicians, electricians, engineers, IT specialists, environmental specialists, health and safety managers, and administrators (skilled); drivers and equipment operators (semi-skilled); construction workers and security staff (low-skilled).</p> <p>The recruitment process and the requirements for each skill level and each employment opportunity need to be clearly communicated to local communities to ensure that no unrealistic expectations are created.</p>	
reduce the need for transport of people and goods,	The need for transport of people and goods will be increased during the construction phase. Lower per capita carbon footprints are predicted due to the commercial forms of transport that will be employed to move the workforce (e.g. public transport, contractor buses).	Volume II: Traffic Impact Assessment;
result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	Not applicable.	n/a
compliment other uses in the area,	Local communities and their service providers will benefit from the socio-economic development provided by the WEF and current land use will be able to continue.	Volume II Social Impact Assessment;
be in line with the planning for the area,	The proposed WEF is in line with applicable international, national, provincial and local planning strategies.	Volume II Social Impact Assessment
for urban related development, make use of underutilised land	The proposed development occurs away from the urban edge.	n/a

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available with the urban edge,		
<i>optimise the use of existing resources and infrastructure,</i>	<p>Wind energy is a renewable, clean resource and reduces pollution and the reliance on non-renewable fossil fuels and water for electricity generation. Existing access roads will be utilised wherever possible. It is expected that any construction water required will be delivered by tankers.</p> <p>Waste removal will be in accordance with best practice by qualified waste removal contractors to the nearest registered landfill.</p> <p>Portable sanitation facilities will be utilised during construction, so that no connection to the local sewerage system will be required.</p> <p>Any additional infrastructure required will be constructed by the developer.</p>	n/a
<i>opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),</i>	<p>No opportunity costs in terms of bulk infrastructure expansions in non-priority areas are predicted due to the proposed development.</p> <p>The proposed WEF is not located within a bulk infrastructure expansion area.</p>	n/a
<i>discourage "urban sprawl" and contribute to compaction/densification,</i>	<p>Not applicable as the proposed development site lies outside of urban areas.</p>	n/a
<i>contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,</i>	<p>The project will contribute to economic and infrastructure development in the Western Cape Province, in line with the Langeberg Integrated Development Plan.</p>	n/a

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<p>encourage environmentally sustainable land development practices and processes,</p>	<p>Construction of the renewable energy Khoe WEF project will assist South Africa in transitioning from a carbon-intensive resource use economy to a sustainable low carbon footprint economy. Sustainable land development is an overarching aspect of the proposed project development.</p>	<p>n/a</p>
<p><i>take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),</i></p>	<ul style="list-style-type: none"> <li>• Feasibility of access for wind turbine delivery, the site is easily accessible from the national road;</li> <li>• Close proximity to the Eskom grid with available evacuation capacity;</li> <li>• Viable wind resource, therefore suited to wind farm development;</li> <li>• The proposed site is agricultural land and current land use is low intensity grazing; and</li> <li>• Willingness of landowners to host a wind farm on their properties.</li> </ul>	<p>Section 7.2: Site Alternatives</p>
<p><i>the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),</i></p>	<p>The proposed development will create jobs and contribute towards socio-economic development in an area that does not have high economic potential.</p> <p>The WEF is likely to result in significant positive socio-economic opportunities.</p>	<p>Vol II: Social Impact Assessment</p>
<p><i>impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and</i></p>	<p>While the proposed WEF has a generally 'high' visual impact significance, the turbines are located in locations with the highest resource wind potential. Impacts to the cultural landscape are unavoidable but only of a medium significance and no other aspects of heritage are expected to be impacted significantly.</p>	<p>Vol II: Social Impact Assessment; Visual Impact Assessment; Heritage Impact Assessment</p>
<p><i>in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?</i></p>	<p>The proposed development aligns with the Langeberg Municipality Integrated Development Plan. The proposed development is predicted to support the creation of a more integrated settlement.</p>	<p>Vol II: Social Impact Assessment</p>

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<p>How were a risk-averse and cautious approach applied in terms of socio-economic impacts?:</p>	<p>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p>	<p>One limitation that could be identified is that some of the provincial documents do not contain data from the 2022 Census. The data from the 2011 and 2016 Household Community Survey is therefore referred to.</p>	<p>Vol II: Social Impact Assessment</p>
	<p>What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</p>	<p>The risk due to limits of current knowledge is considered to be low due to the positive socioeconomic impact expected from the proposed WEF.</p>	<p>Vol II: Social Impact Assessment</p>
	<p>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	<p>A risk-averse and cautious approach was utilised throughout the impact assessment process by all specialists. The precautionary approach has been adopted for this study, i.e. assuming the worst-case scenario will occur and then identifying ways to mitigate or manage these impacts. Mitigation measures to manage these impacts have been provided.</p>	<p>Vol II: Social Impact Assessment</p>
<p>How will the socio-economic impacts resulting from this development impact on people’s environmental right in terms following:</p>	<p>Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p>	<p>Negative impacts were identified by the Social Specialist. These are:</p> <ul style="list-style-type: none"> <li>• The presence of construction workers on-site and in the area on the local communities.</li> <li>• Potential influx of job seekers.</li> <li>• The potential loss of farmlands for grazing of sheep and on associated farming activities.</li> <li>• Potential safety risk for farmers, risk of livestock theft and theft of farming infrastructure.</li> <li>• The increased risk of potential grass fires associated with the construction phase.</li> </ul> <p>The potential impacts of heavy vehicles and construction related activities, damage to roads, and dust pollution.</p> <p>The potential loss of farmland.</p> <ul style="list-style-type: none"> <li>• Visual impact and associated impact on the sense of place.</li> <li>• The potential impact on tourism.</li> </ul>	<p>Vol II: Social Impact Assessment App B: EMPr EIAr Section 10</p>

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		<p>The potential loss of employment opportunities and associated income (decommissioning impact).                  The establishment of several renewable energy facilities (WEFs and SEFs), may potentially place pressure on property, local services, e.g. education, medical, accommodation, water supply, waste management etc. (cumulative impact).                  Measures to minimise, manage and remedy negative impacts are provided in Volume II: Social Impact Assessment and Section 9 of this Report.</p>	
	<p><i>Positive impacts. What measures were taken to enhance positive impacts?</i></p>	<p>Positive impacts were identified by the Social Specialist. These are:</p> <ul style="list-style-type: none"> <li>• Establishment of renewable energy infrastructure and the generation of clean, renewable energy;</li> <li>• The creation of local employment and business opportunities, and opportunities for skills development and on-site training;</li> <li>• Benefits associated with the local economic development initiatives; and</li> <li>• Benefits for landowners.</li> </ul> <p>Details of enhancement measures are provided in the Social Impact Assessment, Section 10 of this EIAr, and are included in the EMPr.</p>	<p>Vol II: Social Impact Assessment                  EIAr Section 10</p>
	<p><i>Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development’s socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</i></p>	<p>It is not expected that the development’s socio-economic impacts will result in significant ecological impacts. Although the development would result in some habitat loss across the site, this is not likely to affect the fauna and flora. Mitigation measures must be implemented to avoid the direct threat to the fauna. These specific mitigation measures should be implemented during construction and operation to reduce this risk. There are no impacts associated with the development of the Khoe WEF on terrestrial biodiversity that cannot be mitigated to an acceptable level. As such, should all the proposed mitigation be implemented, the Khoe WEF development is deemed acceptable from a terrestrial ecological impact perspective. In terms of cumulative impacts, the affected area has not been significantly impacted by renewable energy development to date and the contribution of the current wind farm development to cumulative impact is considered low and acceptable. It is thus the reasoned opinion of the specialist that the Khoe WEF development should be authorised subject to the various mitigation and avoidance measures as indicated.</p>	<p>Vol II: Terrestrial Biodiversity Assessment</p>
	<p><i>What measures were taken to pursue the selection of the “best practicable environmental option” in terms of socio-economic considerations?</i></p>	<p>Iterative specialists’ constraints mapping identified the most suitable areas for development for which a development layout was then produced for assessment. The results of the specialist’s studies, including interviews by</p>	<p>Volume II: Specialist</p>

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		the Social Specialist, and Scoping phase PPP, further informed the development of the updated site layout.	Assessment Reports
<i>What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</i>	<i>Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?</i>	<p>The proposed development aligns with a variety of planning policies that consider environmental and spatial justice.</p> <p>Alternatives were 'scoped' out in the scoping phase and the most feasible environmentally and socially preferred location was chosen for approval in the EIA phase.</p> <p>Public consultation considers all person(s) and the application process will continue to consider all persons, and disadvantaged people who may be impacted by the development.</p>	n/a
<i>What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</i>		The proposed development will contribute to equitable access by supplying electricity to the national grid, and by providing local and regional socioeconomic benefits in terms of the REIPPPP Economic Development requirements, which includes a BBBEE scorecard on which wind projects are evaluated.	n/a
<i>What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?</i>		Construction, operation and decommissioning of the proposed development will be done according to environmental health and safety legislative requirements and applicable guidelines.	n/a
<i>What measures were taken to:</i>	<i>ensure the participation of all interested and affected parties,</i>	Public participation is being undertaken according to NEMA: EIA Regulations (2014) as amended and DFFE (2017) Public Participation Guidelines.	Section 9; Volume III



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<p><i>provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation,</i></p>	<p>The PPP is being undertaken in terms of legislative requirements and best practice guidelines. All notifications are provided in English and Afrikaans. Further languages are made available upon request.</p>	<p>Section 9; Volume III</p>
<p><i>ensure participation by vulnerable and disadvantaged persons,</i></p>	<p>The PPP is being undertaken according to best practice guidelines and regulatory requirements; Notification of initiation of the PPP was provided in all required channels, i.e. newspaper adverts, site notices, local posters and written notifications.</p>	<p>Section 9; Volume III</p>
<p><i>promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,</i></p>	<p>The proposed development fits into the various planning policies and the implementation of a Community Trust will assist the local strategies, including improving education facilities and youth development</p>	<p>Vol II: Social Impact Assessment</p>
<p><i>ensure openness and transparency, and access to information in terms of the process,</i></p>	<p>Legislative requirements and best practice guidelines are followed throughout the process.  The PPP is being undertaken in terms of legislative requirements and best practice guidelines.</p>	<p>Section 9; Volume III</p>
<p><i>ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, and</i></p>	<p>A PPP is being undertaken in terms of legislative requirements and best practice guidelines.  A Social Impact Assessment forms part of the Scoping &amp; EIA process. The independent Social Specialist ensures that all needs and values are considered.</p>	<p>Section 9; Volume III: Social Impact Assessment</p>

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	<i>ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?</i>	<p>The Social Impact Assessment and PPP that are conducted according to legislation and guidelines ensure that women and youth are recognised and involved in the process.</p> <p>REIPPPP requirements place specific responsibilities on IPPs in terms of women and youth development.</p>	Section 9; Volume III: Social Impact Assessment
	<i>Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?</i>	<p>The proposed WEF has a good planning fit with all applicable policies and will result in substantial local socio-economic opportunities.</p> <p>The key challenges facing the region are poverty and inequality and a shortage of skills. As such the proposed development will be of benefit to the local area by creating job and business opportunities, particularly for unskilled and semi-skilled local workers.</p>	Volume II: Social Impact Assessment
	<i>What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?</i>	Future workers on the proposed development will be educated on their rights to refuse work.	n/a
Describe how the development will impact on job creation in terms of, amongst other aspects:	the number of temporary versus permanent jobs that will be created,	An estimated 200-250 temporary employment opportunities will be created for 18 - 24 months during the construction phase. Approximately 20 full time employment opportunities will be created for the operational phase of the proposed development.	Volume II: Social Impact Assessment
	whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the	Members from the local communities in De Doorns and Touws River would qualify for a percentage of low skilled and semi-skilled employment opportunities and several skilled opportunities. Most of these employment opportunities will accrue to Historically Disadvantaged (HD) members from the local community. Given relatively high local unemployment levels and	Volume II: Social Impact Assessment

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	skills available in the area),	limited job opportunities in the area, this will represent a significant, if localised, social benefit.	
	the distance from where labourers will have to travel,	It is expected that most workers will reside in the nearby towns Worcester, De Doorns and Touws River	Volume II: Social Impact Assessment
	the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and	<p>Members from the local communities in De Doorns and Touws River would qualify for some of the low skilled and semi-skilled employment opportunities and several skilled opportunities. The Most of these employment opportunities will accrue to Historically Disadvantaged (HD) members from the local community. Given relatively high local unemployment levels and limited job opportunities in the area, this will represent a social benefit.</p> <p>It will also be possible to increase the number of local employment opportunities through the implementation of a skills development and training programme linked to the operational phase.</p> <p>A percentage of the monthly wage bill earned by permanent staff would be spent in the regional and local economy. This will benefit local businesses in the relevant towns. The benefits to the local economy will extend over the anticipated 20-year operational lifespan of the project.</p> <p>The local hospitality industry is also likely to benefit from the operational phase. These benefits are associated with site visits by company staff members and other professionals (engineers, technicians etc.) who are involved in the company and the project but who are not linked to the day-to-day operations.</p> <p>Procurement during the operational phase will also create opportunities for the local economy and businesses.</p>	Volume II: Social Impact Assessment
	the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).	The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities that will benefit members from the local communities in the area, including De Doorns and Touws River. Majority of households depend of the agriculture sector, therefore this proposed employment will create employment opportunities.	Volume II: Social Impact Assessment
What measures were taken to ensure:	that there were intergovernmental coordination and	All applicable planning policies and legislation were considered. The proposed development fits with all planning policies.	Volume I: EIA Report

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	<p>harmonisation of policies, legislation and actions relating to the environment, and</p>	<p>Organs of State were pre-identified and registered on the I&amp;AP database and these were updated, if required, as the development phases have progressed.</p>	<p>Volume III: PP Report</p>
	<p>that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?</p>	<p>As registered I&amp;APs all public correspondence including notifications of reports availability are provided.</p>	<p>Volume III: PP Report</p>
<p>What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people’s common heritage?</p>		<p>The proposed development aims to uphold the principles of sustainable development.  The project team consists of suitably qualified individuals that comply with all legal requirements.</p>	<p>Volume I: EIA Report Volume II: Specialist Reports</p>
<p>Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?</p>		<p>Specialist mitigation measures were identified during the EIA process and provided in the EIAr and EMPr. These measures are realistic and should they change, the EMPr must be submitted to the Department and made available for public to review and comment.</p>	<p>Volume I: Appendix B: EMPr</p>
<p>What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?</p>		<p>An EMPr is submitted with EIAr. The EMPr is a legally binding document, which when enforced during construction, operational or decommissioning phases, hold the applicant or their representative liable for any remedial actions as a result of negligence.</p>	<p>Volume I: Appendix B: EMPr</p>

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<p>Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?</p>	<p>The alternative selection process includes the assessment of the No Development alternative, site alternatives, design layout alternatives and technology alternatives.</p>	<p>Section 7</p>
<p>Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?</p>	<p><b>Cumulative impact on sense of place</b>                  The proposed Khoe WEF is also one half of a larger wind energy cluster consisting of another proposed WEF to the south, namely the Khoe WEF. The cumulative visual impact of the proposed Khoe WEF, together with the proposed Hugo WEF is expected to be Very High, depending on the observer’s sensitivity to wind turbine structures. The VIA notes that owing to the sensitivity of the landscape, the high visual quality and the potential visual impacts on sensitive visual receptors, the cumulative visual impact is not considered to be within acceptable limits.</p> <p><b>Cumulative impact on local services and accommodation</b>                  The establishment of a number of renewable energy facilities and associated projects, such as the proposed WEF, in the Breede Valley Municipality and Langeberg Municipality has the potential to place pressure on local services, specifically medical, education and accommodation.</p> <p><b>Cumulative impact on local economy</b>                  The establishment of renewable energy facilities and associated projects, such as the WEF, in the LM will create employment, skills development and training opportunities, creation of downstream business opportunities.</p>	<p>Volume II: Social Impact Assessment</p>

## 5.1 THE NEED AND DESIRABILITY OF RENEWABLE ENERGY FACILITIES

WEFs can play a role in mitigating or reducing climate change, addressing South Africa's energy resource constraints and producing low-cost energy. In addition, operating WEFs in South Africa contribute significantly to the economic development of the areas in which they are located through the requirements of the REIPPPP adjudication process. This section of the report highlights the national, provincial and local plans and policies that are in support of renewable energy facilities. Throughout this section, it is demonstrated that at all levels of governance, policy supports the development of renewable energy to address energy supply issues, and to promote economic growth in South Africa.

### 5.1.1 MITIGATING CLIMATE CHANGE

The scientific consensus is that climate is changing and that these changes are in large part caused by human activities. Of these human activities, increase in carbon dioxide (CO<sub>2</sub>) levels due to emissions from fossil fuel combustion is regarded as a significant contributor to anthropogenic climate change.

As explained in National Treasury's Carbon Tax Policy Paper (May 2013), addressing the challenges of climate change through facilitating a viable and fair transition to a low-carbon economy is essential to ensure an environmentally sustainable economic development and growth path for South Africa. Further the Policy Paper states that the South African government is of the view that South Africa needs to reduce its greenhouse gas emissions while working to ensure economic growth, increase employment, and reduce poverty and inequality.

Renewable energy projects will play a significant role in meeting the targets of the Paris Agreement and assisting the transition to a low-carbon economy.

### 5.1.2 DIVERSIFICATION AND DECENTRALISATION OF SUPPLY

With its abundant coal supplies, approximately 89% of South Africa's energy needs are currently met through coal-fired generators, with nuclear energy contributing approximately 5% and the balance by pumped storage and hydroelectric (3.6%), renewable energy (2.4%) and gas turbines (0.1%). Electricity generation is dominated by state-owned power company Eskom, which currently produces over 96.7% of the power used in the country.

A diversification of energy supplies and producers, particularly with respect to renewable energy sources, would lead to greater energy security and economic and environmental benefits.

The deployment of various renewable technologies increases the diversity of electricity sources and, through local decentralised generation, contributes to the flexibility of the system and its resistance to central shocks.

According to the International Energy Agency, "renewable energy resources ... exist virtually everywhere, in contrast to other energy sources, which are concentrated in a limited number of countries. Reduced energy intensity, as well as geographical and technological diversification of energy sources, would result in far-reaching energy security and economic benefits."

The renewables programme has resulted in over 6,000 MW of generation capacity being allocated to bidders across a variety of technologies, principally in wind and solar in South

Africa. Progress in this regard has been made under the DoE REIPPPP. According to the DoE's Integrated Resource Plan for Electricity 2010-2030, South Africa is aiming to procure 9200 MW of wind power by 2030.

### 5.1.3 ECONOMIC DEVELOPMENT AND JOB CREATION

The REIPPPP requires Economic Development ("ED") commitments from onshore wind energy projects and projects are adjudicated according to their ED commitments. The main ED beneficiaries of approved projects are currently communities living within a 50 km radius of renewable energy facilities. Projects are bid and thereafter adjudicated according to tariff (70%) and Economic Development (30%). There is therefore an incentive for projects to focus on Economic Development of the Local Community and to assign as much revenue, jobs, procurement etc. to local people as well as South African companies and people as possible to stand a chance of having a successful project.

TABLE 5-3 REIPPP POINTS WEIGHTING

Economic Development Elements	Weighting
Job Creation	25%
Local Content	25%
Ownership	15%
Management Control	5%
Preferential Procurement	10%
Enterprise Development	5%
Socio-Economic Development	15%
Total	100%
Total points	30 points

A number of these elements will have a significant and positive impact on the Local Community.

In terms of job creation, bidders are required to indicate the actual number of jobs that will be created for South African citizens, Skilled People, Black People, Skilled Black People and Citizens from the Local Communities. Significant skilled and unskilled job opportunities will be created in the Local Communities, particularly during the construction period.

For Ownership, bidders are required to indicate the total shareholding of the Project Company in the hands of Black People and Local Communities. The minimum ownership percentage for Local Community is 2.5% but projects have committed up to 40% Local Community Ownership in order to have a competitive project. Broad-based community trusts are established as a vehicle for Local Community Ownership to receive dividend revenue from an operating project that will be invested in socio-economic development imperatives as determined by trustees. The ownership stake is funded either through debt or through equity partners ("a free-carry").

The Socio-Economic Development and Enterprise Development commitments require a percentage of gross revenue from the operating wind farm to be invested in education, health, small business development etc. Projects are required to commit at least 1% of gross revenue towards socio-economic development. As an indication, 1% of gross revenue of a hypothetical 140 MW wind farm, with a capacity factor of 35% and a tariff of 80 c/kWh would equal

approximately R3.5 m/year (and R68 million over the 20-year operation period of a project). Projects in the REIPPPP receive additional points if the socio-economic and enterprise development investments are committed to be invested in the Local Community.

WEFs in South Africa will create skilled and unskilled jobs, particularly during the construction period. Under the REIPPPP, projects are incentivised to maximise the direct job creation opportunities, particularly for people in the communities surrounding the project.

WEFs tend to be constructed in rural areas with small communities and limited infrastructure and social amenities. A wind farm would create indirect jobs in accommodation, catering and other services that would support a wind farm and cater for the material and social needs of wind farm workers.

Localisation is considered one of the major contributors to job creation and general improvement of the economy of South Africa. Localisation through the construction of new manufacturing facilities to build wind turbine towers and other turbine components in South Africa is currently progressing.

Wind energy can provide technical skills to South Africans and thus improve the technical skills profile of the country and the regions where wind energy facilities are located. Through the REIPPPP, developers' own initiatives and through support from international donor agencies, a number of young South Africans are being trained on various aspects of wind farm construction and operation.

These projects, if successfully implemented, have the potential to transform for the better key development areas of South Africa and would assist South Africa in meeting its development goals, while meeting its carbon emission reduction targets as per international protocols

## 5.2 POLICIES IN SUPPORT OF RENEWABLE ENERGY

Renewable energy is supported in terms of meeting the country's climate change goals, and in terms of reducing the country's dependence on fossil fuels as the main source of meeting the country's electricity requirements. The National Climate Change Adaptation Strategy (NCCAS) for The Republic of South Africa Version UE10, 13 November 2019, explains that the South African primary sectors, such as agriculture and mining, which are natural resource dependent are high consumption uses of energy. The NCCAS is adopting a cluster approach to assist with the changing climate conditions and the affect it has on various sectors. An action in support of this development is the approach to "create a more adaptive energy system to reduce dependence on a centralised system and increase distributed generation, especially in rural areas". "This will involve encouraging the development of an adaptive and decentralised energy system so that the system is more resilient to climate disruptions".

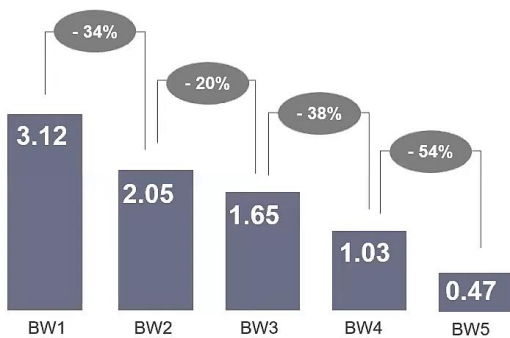
Both national and provincial policies and planning documents support the development of renewable energy facilities. The development of and investment in renewable energy is supported by the National Development Plan (NDP), New Growth Path Framework, Integrated Resource Plan (IRP) and National Infrastructure Plan. At a provincial level, the development of renewable energy is supported by the Northern Cape Provincial Development and Resource Management Plan / Provincial Spatial Development Framework (PSDF) of 2020, Pixley Ka Seme District Municipality Integrated Development Plan (IDP) for 2022-2027, and Spatial Development Framework; and the Ubuntu Local Municipality Integrated Development Plan for 2022 - 2023.



The need and desirability for renewable energy developments play a role in South Africa meeting its energy and climate change targets and provides a socio-economic boost at the local level in areas that are in need of it.

Aside from environmental considerations, investment in renewables have been driven by dramatic reductions in their costs. Figure 5-1 shows this trend and that in the six years between bid windows 4 and 5, the average price of electricity purchased through the REIPPPP fell by 54% (Magoro, 2021).

FIGURE 5-1 REIPPPP AVERAGE BID PRICES IN APRIL 2021 TERMS (MAGARO, 2021)



### 5.3 NEED AND DESIRABILITY GUIDE

Reference is made to the DFFE 2017 Guideline on Need and Desirability which states that while the “concept of need and desirability relates to the type of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which need refers to time and desirability to place – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to wise use of land – i.e. the question of what the most sustainable use of land is.”

The guidelines pose questions that should be considered in this investigation, which will be addressed in EIA Phase.

## 6. DESCRIPTION OF THE BASELINE ENVIRONMENT

To evaluate the potential E&S impacts, information relating to the existing environmental conditions or baseline environment is collected through field and desktop research. The baseline environment also extends into the future, although predictions of any changes can involve a high number of variables and may be subject to potentially large uncertainties. As a result, in most cases, the baseline is assumed to remain unchanged throughout the operation of the development. Where this is not the case, this is stated.

The baseline environment has been used to identify any potential sensitive receptors on and near the site, and it is used to assess what changes may take place during the construction, operation and decommissioning phases of the development and the effects, if any, that these changes may have on these receptors.

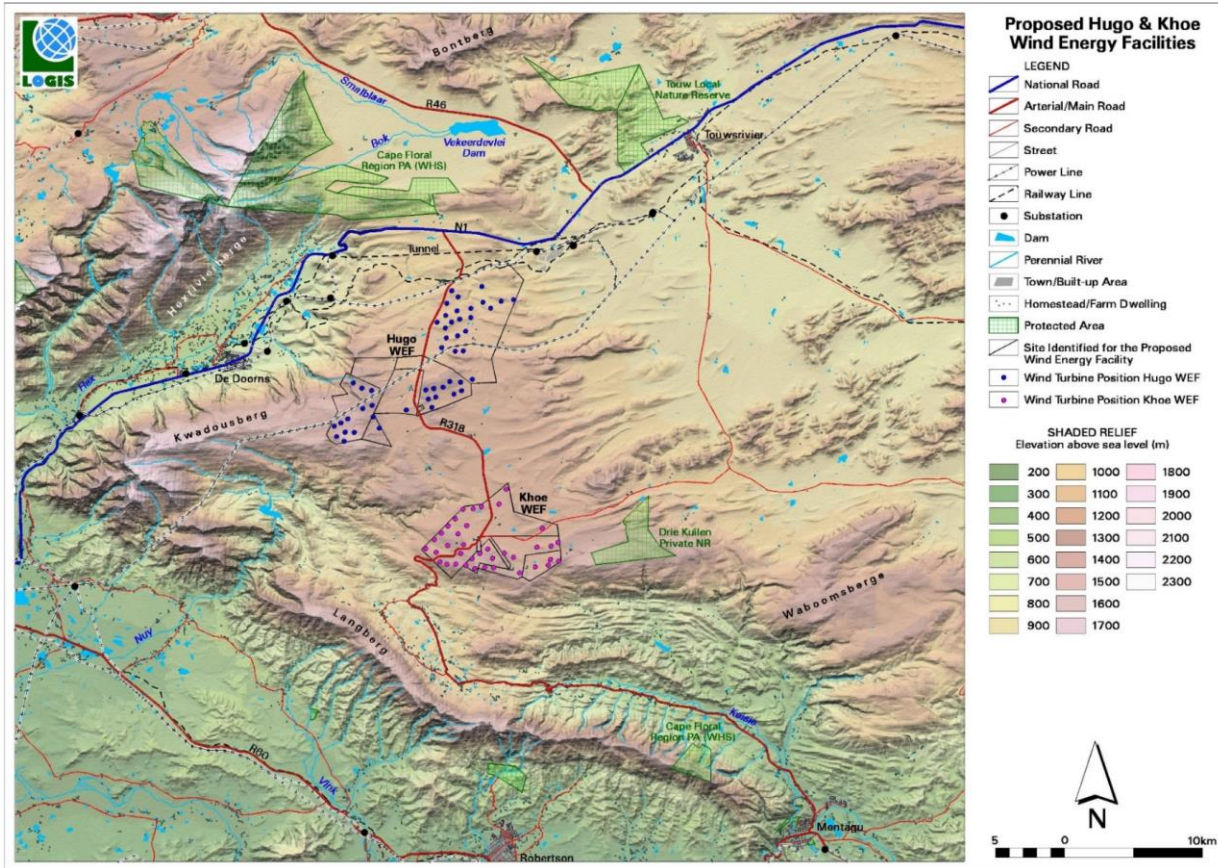
Within each technical assessment, the methods of data collection are discussed with the relevant specialists. Data is also collected from public records and other archive sources and where appropriate, extensive field surveys are carried out. The timing/seasonality of the work within the study area is also outlined within each assessment where applicable.

### 6.1 BIOPHYSICAL CHARACTERISTICS OF THE STUDY AREA

#### 6.1.1 TOPOGRAPHY AND TERRAIN

The study area occurs on land that ranges in elevation from approximately 200 meters above sea level (m asl) in the south west at the base of the Langeberg Mountain along drainage lines and in the west along the Hex River to 1,800m asl on the tops of mountain ranges such as Kwadousberg and Langeberg. The site itself is located on land with an average elevation of 1,500m asl. Numerous mountain ranges are located within the study area, namely the Hexrivierberge and Kwadousberg in the west, Langeberg to the south, Waboomsberge to the south east and Bontberg to the north. Prominent water sources within the study area include the Nuy, Vink, Keisie, Hex Rivers. The Smalblaar and Bok rivers flow into the Verkeerdevlei Dam in the north. See Figure 6-1 for the shaded relief/topography map of the study area.

FIGURE 6-1 SHADED RELIEF MAP OF THE STUDY AREA



The proposed Khoe WEF and associated infrastructure is located approximately 29 km south west of the town of Touws River, 20 km south east from De Doorns and 35 km west of Worcester within the Langeberg Local Municipality within the Western Cape Province. The site straddles the R 318, which is a designated tourist route in terms of the Langeberg SDF (2023). The R318 links Montagu to the south to the N1 to the north. The proposed Khoe WEF is located ~ 8-10 km south of the Hugo WEF, and also straddles the R318. An initial review of available information indicates that there are several provincial and private nature reserves and tourist facilities located in the area. The attraction to the area is linked to the natural landscape and rural character, including the areas vistas and views. The proposed Khoe WEF is therefore located in an area that is visually sensitive. Figure 6-2 illustrates the location of private and provincial nature reserves in the Langeberg Municipality and in vicinity to the proposed Khoe WEF site.

**FIGURE 6-2 LOCATION OF PRIVATE AND PROVINCIAL NATURE RESERVES IN THE LANGEBERG MUNICIPALITY AND IN VICINITY TO THE PROPOSED KHOE WEF SITE**

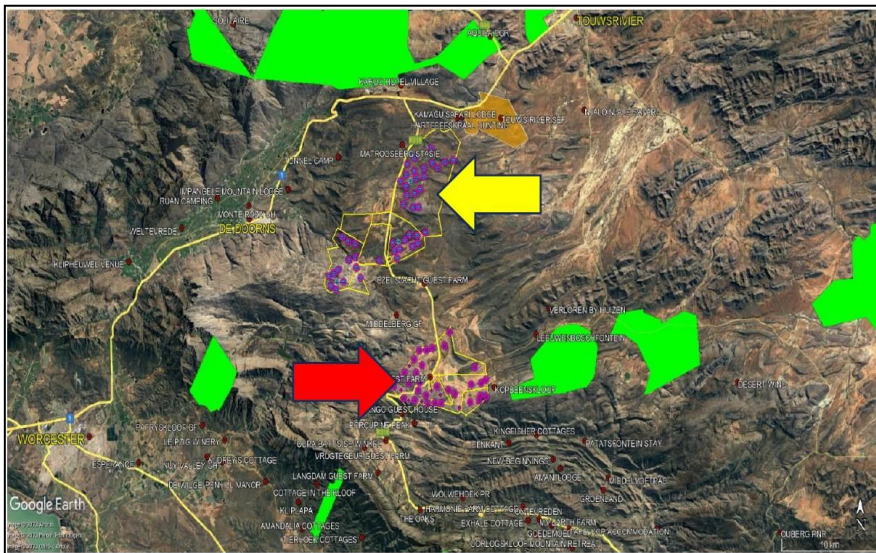
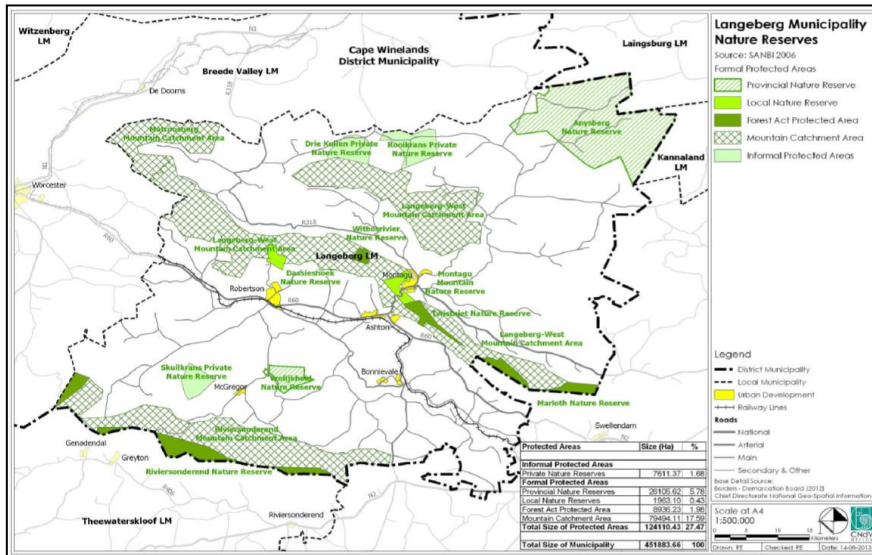




FIGURE 6-3 RESERVES AND PROTECTED AREAS



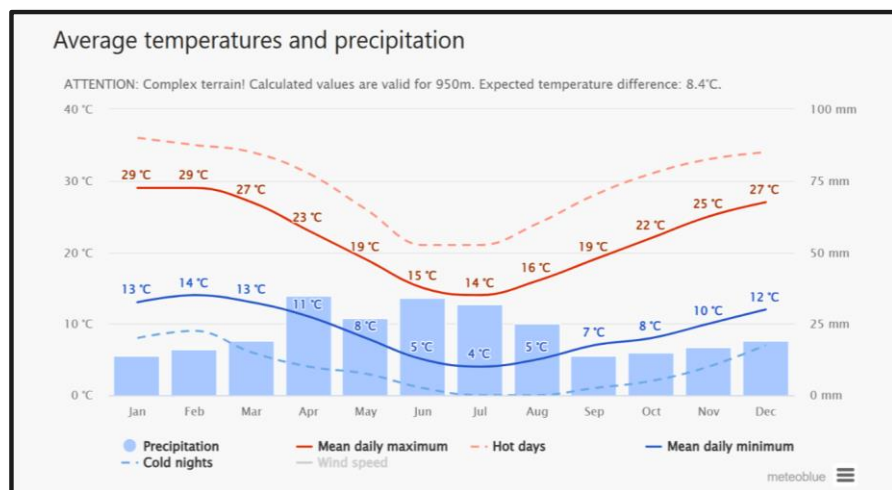
6.1.2 CLIMATE CONDITIONS

The proposed Khoe WEF is situated on a plateau, which is occasionally called the "Agterveld". Most of the precipitation occurs in winter with a second rainfall that is often experienced from October to December. Seasonal snow occurs during winter.

Long-term climate data from the nearby Matroosberg weather station, is used for a general climate description for the Khoe WEF. Generally, January and September are the driest months, with an average of 14 mm of rainfall. April is the peak rainfall month with an average rainfall of 35 mm (see Figure 6-4 below). There is a difference of approximately 21 mm between the wettest and driest months (meteoblue.com, 2023).

The average maximum temperature is 29°C and the average minimum temperature 4°C, while the highest maximum recorded temperature is 36°C, and the lowest minimum is 0°C. The hottest months of the year are January and February, while the coldest month of the year is July (meteoblue.com, 2023). Rainfall averages 300 mm per annum, but varies with altitude from 150-470 mm. This area is denoted as a winter-rainfall area, with frost evident for 10 to 40 days per year.

FIGURE 6-4 CLIMATE OF THE MATROOSBERG WEATHER STATION (METEOBLUE.COM, 2023)



### 6.1.3 GELOGY, SOILS, LAND USE AND AGRICULTURAL POTENTIAL

The geology found at the site mainly consists of sandstone, shale, siltstone, and mudstone of the Bokkeveld Group. It also consists of quartzitic and feldspathic sandstone of the Skurweberg and Rietvlei Formations, and Table Mountain Group (DAFF, 2002).

The project site is located within a Protected Agricultural Area according to DALRRD (2020). The soils found at the Project area are predominantly very shallow to moderately deep, medium to heavy textured soils on underlying rock. The dominant soils are shallow on underlying weathered bedrock of the Glenrosa, Hutton, Swartland, and Mispah soil forms. There is a high proportion of rock outcrops. The site is in an area where there is little crop production. The soils are limited in their agricultural potential by shallow depths, rockiness, and low water holding capacity and are unsuitable for crop production as a result, except in some lower-lying areas where accumulation leads to deeper soils, and limited cropping is practiced. With reference to the soil capability classification, which is marked out of 9 (DAFF, 2017), the soils at the Khoe WEF site are predominantly 2 (low-very low), 4 (low-moderate) and 5 (moderate). The agricultural land use in the surrounding area, as well as the site is dry rain-fed crop land production, as well as grazing.

### 6.1.4 FRESHWATER AND WETLANDS (AQUATICS)

The proposed PAOI falls within the Langeberg-West Catchment Area, which is an important water recharge area which has triggered the Very High Sensitivity in the Terrestrial Biodiversity Theme as an ESA 1. In addition, several watercourses are marked for restoration from other land use.

The study area is dominated by low lying drainage areas with riverine and drainage line systems, valley bottom wetland areas, seepage wetlands associated with several of the larger dams and one small depression. Dams and weirs / berms with no wetland or aquatic features were also common within the study area.

The site is situated within the North Langeberg Sandstone Fynbos, South Langeberg Sandstone Fynbos and Matjiesfontein Shale Renosterveld vegetation units, all forming part of the Die Brak river catchment. These vegetation units are not listed as a Threatened Ecosystem, by NEMA due to it being considered Endangered. A small southern portion of the site is located in the Koo River catchment however only one drainage feature associated with this catchment is located within the study area farm portions.

Further the area has seen a high degree of transformation in the form of cultivation areas, grazing, as well as the creation of several farm dams, roads and tracks. Of significance is the fact that most of the watercourses have either been converted into herring bone drain features or bermed to increase flows into downstream dams. This has then led to riverbed incision and the formation of the alluvial fans observed, i.e. sedimentation of low-lying downstream areas due to this and loss of vegetative cover.

The study area is located within the Southern Folded Mountain Bioregion, hence the diversity of high lying mountain catchments (mostly rocky) and the low-lying alluvial systems, but all located within the Breede-Olifants Catchment Management Agency and is the lead agent for water resources management within the Breede-Gouritz Water Management Area (BGWMA).

The Present Ecological State (PES) of a river, watercourse or wetland represents the extent to which it has changed from the reference or near pristine condition (Category A) towards a highly impacted system where there has been an extensive loss of natural habit and biota, as well as ecosystem functioning (Category E).

The PES scores have been revised for the country and based on the new models, aspects of functional importance as well as direct and indirect impacts have been included (DWS, 2014). The new PES system incorporates Ecological Importance (EI) and Ecological Sensitivity (ES) separately as opposed to Ecological Importance and Sensitivity (EIS) in the old model, although the new model is still heavily centred on rating rivers using broad fish, invertebrate, riparian vegetation and water quality indicators. The Recommended Ecological Category (REC) is still contained within the new models, with the default REC being B, when little or no information is available to assess the system or when only one of the above-mentioned parameters are assessed or the overall PES is rated between a C or D.

All of the systems assessed by DWS (2014) on a Subquaternary level within the study area were rated as PES = D or Largely Modified. While these were also rated as High in terms of Ecological Sensitivity and Very High in terms of Ecological Importance respectively, for SQ8809.

Based on the information collected during the field investigations, these ratings are verified and upheld for the riverine systems, i.e. systems were rated high (PES = D). The High Ecological Sensitivity rating for the natural water sources, is further substantiated by the fact that the affected catchments contain wetlands, included as Critical Biodiversity Areas, Ecological Support Areas, wetlands and rivers (Figure 6-6). Further, the sites are shown as National Freshwater Ecosystem Priority Area – NFEPA.

Overall, these catchment areas and subsequent rivers / watercourses are largely in a transformed state with localised impacts in some areas, which include the following:

- Erosion and sedimentation associated with road crossings;
- Grazing and farming

- Alien invasive trees / plants
- Impeded water flow due to several in channel farm dams; and

Lastly based on the observation made in the field, and the runoff generated by the site, the importance of these areas in terms of surface and ground water resources is thus valid, however should the wind farm footprint avoid any of the delineated areas, and place suitable stormwater management features in place, then little to no changes to the hydrological environment is anticipated.

The ground-truth delineations were compared to current waterbody inventories. These inventories include wetland spatial data based on landcover 2007 data, previous assessments and wetland information retained by the Provincial authorities, combined into one database that formed part of the updated National Spatial Biodiversity Assessment, 2018. Little was known or assessed previously for this site. A baseline map was then developed and refined using the 2023 survey data. The delineated wetlands, watercourse and depressions in relation to the site layout is shown in Figure 6-5.

FIGURE 6-5 PROPOSED LAYOUT MAY 2024 IN RELATION TO DELINEATED WETLANDS, WATERCOURSES AND IN PLACES DEPRESSIONS

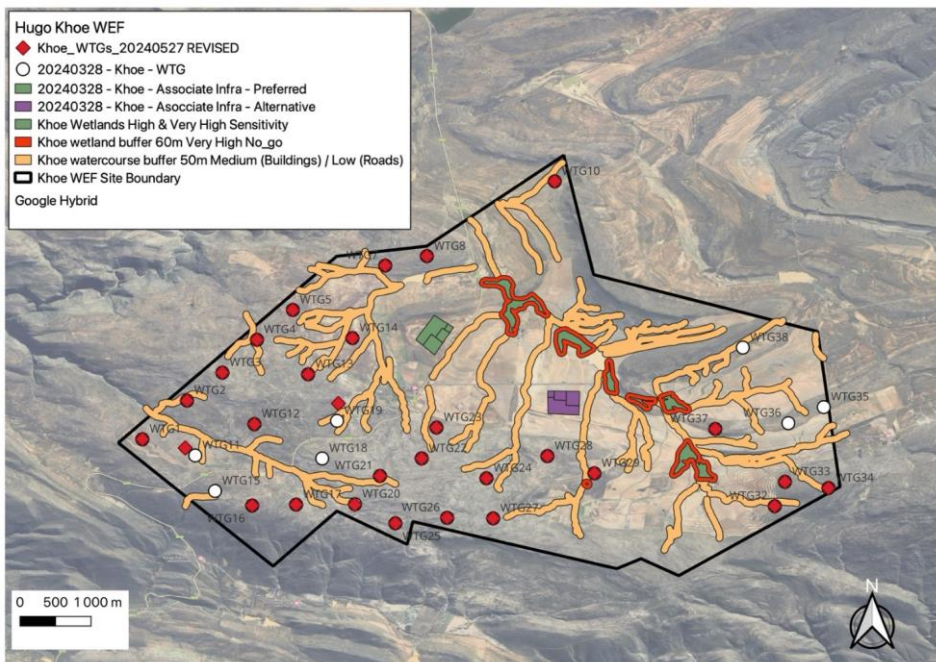
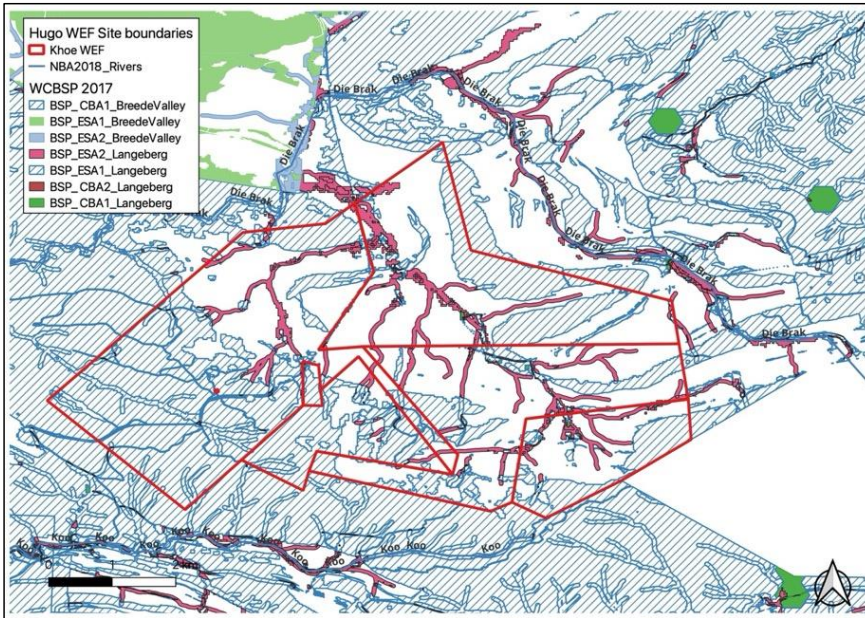




FIGURE 6-6 THE CRITICAL BIODIVERSITY AREAS AS PER THE WESTERN CAPE BIODIVERSITY SPATIAL PLAN – WCBSP 2017



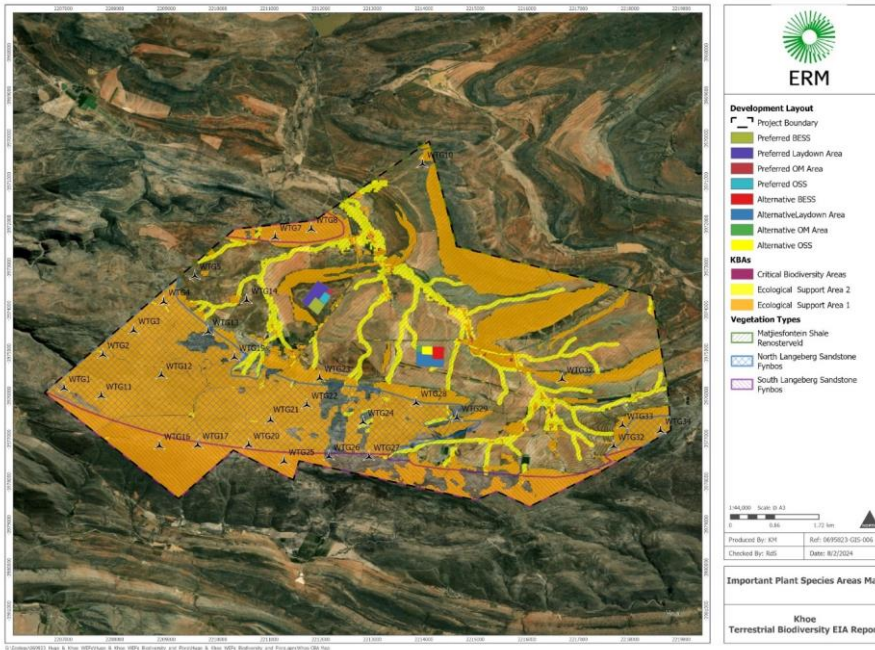
The sensitivity ratings of High No-go and Low were determined through an assessment of the aquatic habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems, but this is considered acceptable since these areas have already been impacted).

These proposed constraints / buffers do not include bird and or bat specialist buffers / constraints as their buffers along aquatic features are at times far larger around aquatic features, than those required for the known aquatic species within this region.

### 6.1.5 HABITAT/VEGETATION TYPES

The proposed Khoe WEF PAOI is dominated by Matjiesfontein Shale Renosterveld, followed by a section of North Langeberg Sandstone Fynbos and a smaller section of South Langeberg Sandstone Fynbos in the southern sections of the project PAOI. All three of the vegetation types identified are listed as Least Concern by the RLE (2022).

**FIGURE 6-7 IMPORTANT PLANT SPECIES AREAS WITHIN THE PROPOSED KHOE WIND ENERGY FACILITY STUDY AREA**



The landscape of the Matjiesfontein Shale Renosterveld is described as being elevated areas (low mountains, parallel hills and mid-altitude plateaus) of low, moderate density leptophyllous shrubland dominated by renosterbos (*Dicerothmanus rhinocerotis*). Heuweltjies, which are soil mounds associated with increased local biodiversity, have been recorded in low densities in some places<sup>41</sup>. The North and South Langeberg Sandstone Fynbos are similar in their constituent vegetation types of proteoid, restioid and ericaceous fynbos, differing only by occurrence altitude and also including asteraceous fynbos on lower slopes.

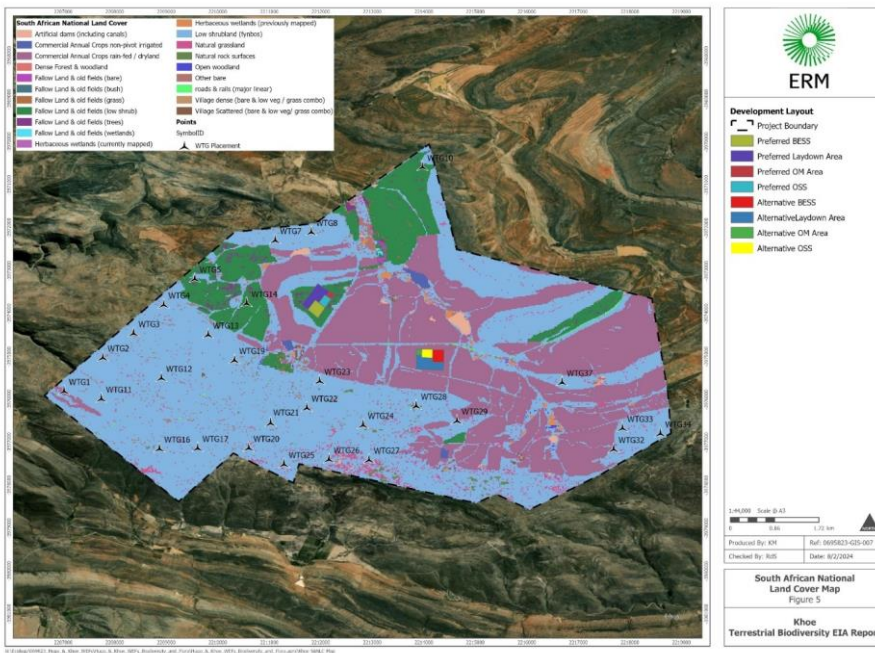
The majority of the site falls within ESA1, which is classified as such due to the presence of both aquatic and terrestrial features that contribute to broader ecological balance and processes that are essential in supporting biodiversity conservation. Areas identified as ESA2 are watercourses marked for rehabilitation from former land-use. Small areas identified as CBAs are due to the presence of aquatic features that maintain important ecological balance and processes that are essential in supporting biodiversity conservation. None of the WTG occur in the CBA, and are mostly distributed in ESA1 and ESA2, with some in areas not marked as important plant areas. According to the SANLC (2020) spatial dataset the proposed Khoewind WEF PAOI is dominated by low fynbos shrublands, commercial annual crops (rain-fed, dryland or non-irrigated) and, fallow lands and old fields (low vegetation and grassland).

<sup>41</sup>Mucina, L. & Rutherford, M.C. (2006). The vegetation of South Africa, Lesotho and Swaziland. South African National Biodiversity Institute.

The ESAs must be maintained in a functional, near-natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functions are not compromised. CBA classified as such due to the presence of various aquatic features that contribute to high levels of biodiversity in this specific area, and currently includes no WTGs. CBAs must be maintained in a natural, or near-natural state with no further loss of natural habitat. Degraded areas in the CBA should be rehabilitated, and only low impact land uses are considered appropriate.

According to the SANLC (2020) spatial dataset, the proposed Khoe WEF PAOI (Figure 6-8) is dominated by low fynbos shrublands, commercial annual crops (rain-fed, dryland or non-irrigated) and, fallow lands and old fields (low vegetation and grassland). The site inspection confirmed that large portions of the proposed project site have been modified and / or disturbed through agricultural activity. Strips of natural vegetation that remain, particularly those around drainage lines, perennial rivers and farm dams, appear to be overgrazed

**FIGURE 6-8 THE LATEST AVAILABLE SOUTH AFRICAN NATIONAL LAND COVER DATASET OF THE PROPOSED KHOE WIND ENERGY FACILITY**



**6.1.6 FLORA**

A total of 1,782 plant species potentially occur in and/or within close proximity of the proposed Khoe WEF. The DFFE Online ST identified a single CR, four EN, 19 VU, 23 Rare and one Critically Rare plant species according to Regional Red Lists potentially present within the proposed study area (Table 6-1). The sources include the SANBI POSA Brahm's (B) database, the Global Biodiversity Information Facility (GBIF) database, The DFFE Online ST and the Biodiversity and Development Institute's Virtual Museum (VM) database.



**TABLE 6-1 PLANT SPECIES OF CONSERVATION CONCERN TRIGGERED BY THE DFFE ONLINE SCREENING TOOL**

Family	Species	Red List (Regional:Global)	Source
Aizoaceae	<i>Antimima condensa</i>	Rare:NE	B, ST
Aizoaceae	<i>Drosanthemum giffenii</i>	VU:NE	GBIF, ST
Aizoaceae	<i>Drosanthemum tuberculiferum</i>	EN:NE	GBIF, ST
Aizoaceae	<i>Esterhuysenia inclaudens</i>	Rare:NE	ST
Aizoaceae	<i>Vlokia ater</i>	Critically Rare:NE	GBIF, ST
Asparagaceae	<i>Asparagus mollis</i>	VU:NE	ST
Asteraceae	<i>Anderbergia elsiae</i>	Rare:NE	ST
Asteraceae	<i>Athanasia hirsuta</i>	Rare:NE	ST
Asteraceae	<i>Athanasia hirsuta</i>	Rare:NE	B, GBIF
Asteraceae	<i>Metalasia helmei</i>	Rare:NE	B, GBIF
Brassicaceae	<i>Heliophila elata</i>	VU:NE	ST
Ericaceae	<i>Erica constantia</i>	Rare:NE	ST
Ericaceae	<i>Erica costatisepala</i>	Rare:NE	ST
Ericaceae	<i>Erica glandulipila</i>	Rare:NE	ST
Ericaceae	<i>Erica setulosa</i>	Rare:NE	ST
Fabaceae	<i>Amphithalea pageae</i>	VU:VU	GBIF
Fabaceae	<i>Amphithalea spinosa</i>	VU:NE	B, GBIF, ST
Fabaceae	<i>Aspalathus aculeata</i>	VU:NE	ST
Fabaceae	<i>Aspalathus muraltioides</i>	EN:NE	ST
Fabaceae	<i>Aspalathus recurva</i>	VU:NE	ST
Fabaceae	<i>Aspalathus rostrata</i>	Rare:NE	B, ST
Fabaceae	<i>Aspalathus shawii</i> subsp. <i>longispica</i>	Rare:NE	GBIF, ST
Fabaceae	<i>Lotononis argentea</i>	VU:NE	GBIF, ST
Fabaceae	<i>Lotononis gracilifolia</i>	EN:NE	GBIF, ST
Fabaceae	<i>Otholobium</i> sp. nov (Storton & Zanotvska 11281 NBG)	VU:NE	ST
Iridaceae	<i>Ixia fucata</i>	Rare:NE	ST
Iridaceae	<i>Ixia fucata</i>	Rare:NE	GBIF
Iridaceae	<i>Ixia oxalidiflora</i>	VU:NE	B, GBIF
Iridaceae	<i>Ixia parva</i>	VU:NE	ST
Iridaceae	<i>Romulea malaniae</i>	CR:NE	B, ST
Iridaceae	<i>Romulea vlokii</i>	VU:NE	GBIF, ST
Orchidaceae	<i>Pachites bodkinii</i>	Rare:NE	ST



Family	Species	Red List (Regional:Global)	Source
Proteaceae	<i>Leucadendron cordatum</i>	Rare:LC	B, GBIF, ST
Proteaceae	<i>Protea rupicola</i>	EN:EN	ST
Restionaceae	<i>Restio aridus</i>	VU:NE	ST
Rhamnaceae	<i>Phyllica mairei</i>	Rare:NE	ST
Rubiaceae	<i>Nenax velutina</i>	Rare:NE	ST
Rutaceae	<i>Acmadenia matroosbergensis</i>	Rare:NE	B, GBIF, ST
Rutaceae	<i>Agathosma subteretifolia</i>	Rare:NE	B, ST
Rutaceae	<i>Diosma passerinoides</i>	VU:NE	ST
Thymelaeaceae	<i>Lachnaea oliverorum</i>	VU:NE	B, GBIF, ST
Withheld	Sensitive Species 1004	VU:NE	GBIF, ST
Withheld	Sensitive Species 1209	Rare:NE	ST
Withheld	Sensitive Species 142	VU:NE	ST
Withheld	Sensitive Species 207	Rare:NE	B, ST
Withheld	Sensitive Species 508	Rare:NE	ST
Withheld	Sensitive Species 521	VU:NE	ST
Withheld	Sensitive Species 654	VU:NE	ST

### 6.1.7 FAUNAL

A total of 586 animal species have been identified as potentially present on site. These include 259 invertebrate, 222 bird, 49 reptile, 46 mammal, and 10 amphibian species. Of these species 30 are regional SCC, and 29 are international SCC (Table 6-2). Online database records include the Black Browed Albatross (*Thalassarche melanophris*) which is a strictly marine species, several large mammal species with natural distribution ranges that do not intersect with the POAI (African Bush Elephant – *Loxodonta Africana*, Hippopotamus – *Hippopotamus amphibius*, Mountain Reedbuck – *Redunca fulvorufula*, and Plains Zebra – *Equus quagga*), and the African Lion (*Panthera leo*), which is listed as extinct within a historic distribution range which intersects with the PAOI. These records likely represent chance encounters and / or translocated individuals on private game farms.

TABLE 6-2 ANIMAL SPECIES OF CONSERVATION CONCERN POTENTIALLY PRESENT IN THE KHOE WEF PAOI

Family	Scientific Name	Red List Status (Regional:International)	Group	Source
Accipitridae	<i>Aquila verreauxii</i>	VU:LC	Aves	GBIF, ST
Accipitridae	<i>Buteo trizonatus</i>	LC:NT	Aves	GBIF
Accipitridae	<i>Circus maurus</i>	EN:EN	Aves	GBIF, ST, VM
Accipitridae	<i>Circus ranivorus</i>	EN:LC	Aves	GBIF

Family	Scientific Name	Red List Status (Regional:International)	Group	Source
Accipitridae	<i>Polemaetus bellicosus</i>	EN:EN	Aves	GBIF, ST
Anatidae	<i>Oxyura maccoa</i>	NT:EN	Aves	GBIF
Bovidae	<i>Damaliscus pygargus</i> subsp. <i>pygargus</i>	VU:NE	Mammalia	VM
Bovidae	<i>Pelea capreolus</i>	NT:NT	Mammalia	GBIF, VM
Bovidae	<i>Syncerus caffer</i>	LC:NT	Mammalia	VM
Chaetopidae	<i>Chaetops frenatus</i>	NT:NT	Aves	GBIF, VM
Ciconiidae	<i>Ciconia nigra</i>	VU:LC	Aves	GBIF, VM
Felidae	<i>Panthera leo</i>	LC:VU	Mammalia	VM
Felidae	<i>Panthera pardus</i>	VU:VU	Mammalia	GBIF, VM
Fringillidae	<i>Crithagra leucoptera</i>	NT:NT	Aves	GBIF
Gruidae	<i>Anthropoides paradiseus</i>	NT:VU	Aves	VM
Heliornithidae	<i>Podica senegalensis</i>	VU:LC	Aves	GBIF
Leporidae	<i>Bunolagus monticularis</i>	CR:CR	Mammalia	ST
Lycaenidae	<i>Aloeides caledoni</i>	Rare:LC	Invertebrates	ST
LYCAENIDAE	<i>Chrysoritis irene</i>	Rare:LC	Invertebrates	VM
Lycaenidae	<i>Chrysoritis rileyi</i>	EN:EN	Invertebrates	GBIF
Lycaenidae	<i>Lepidochrysops bacchus</i>	Rare:LC	Invertebrates	VM
Muscicapidae	<i>Monticola explorator</i>	LC:NT	Aves	GBIF
Mustelidae	<i>Aonyx capensis</i>	NT:NT	Mammalia	VM
Otididae	<i>Eupodotis afra</i>	VU:LC	Aves	GBIF, ST, VM
Otididae	<i>Neotis ludwigii</i>	EN:EN	Aves	VM
Phoenicopteridae	<i>Phoenicopterus minor</i>	NT:NT	Aves	VM
Picidae	<i>Geocolaptes olivaceus</i>	LC:NT	Aves	GBIF
Procellariidae	<i>Procellaria aequinoctialis</i>	VU:VU	Aves	GBIF

Family	Scientific Name	Red List Status (Regional:International)	Group	Source
Sagittariidae	<i>Sagittarius serpentarius</i>	VU:EN	Aves	GBIF
Scolopacidae	<i>Calidris ferruginea</i>	LC:NT	Aves	GBIF
Scolopacidae	<i>Calidris minuta</i>	LC:NT	Aves	GBIF
Synlestidae	<i>Ecchlorolestes peringueyi</i>	NT:NT	Invertebrates	VM
Testudinidae	<i>Psammobates tentorius</i> subsp. ?	NT:NT	Reptilia	VM
Testudinidae	<i>Psammobates tentorius tentorius</i>	NT:NT	Reptilia	VM
Turnicidae	<i>Turnix hottentottus</i>	EN:LC	Aves	GBIF

A total of 3,873 images of 4,513 animals were recorded by camera traps during the study. These represented 66 positively identified species. The most frequently recorded species across the study were sheep (*Ovis aries*), accounting for 1,232 (32%) of images. Cape Spurfowl (*Pternistis capensis*, 13%), hare sp. (*Lepus* sp. 9%), Black-backed Jackal (*Canis mesomelas*, 8.5%) and African Wildcat (*Felis lybica*, 4.6%) were also frequently recorded. However, multiple images of the same individual animals were recorded when they lingered in front of the camera trap sensor. A total of 2,778 independent records of 3,269 animals were recorded, with sheep, Cape Spurfowl, Black-backed Jackal and hare sp. nevertheless accounting for the bulk of independent records.

Two non-avian SCCs were included in the Screening Tool output, with *Insecta-Aloeides caledoni* and *Mammalia-Bunolagus monticularis* listed as Medium sensitivity. The desktop study revealed two SCCs potentially present in the study site that were not included in the Screening Tool output, namely Grey Rhebok (*Pelea capreolus*) and Leopard (*Panthera pardus*). Grey Rhebok were confirmed as present within the project site, while Riverine Rabbit was confirmed as present in the surrounding area but not within the project boundary. Leopard was considered to have a high probability of utilizing at least parts of the study site on occasion. The Caledon Copper (*Aloeides caledoni*) is considered Least Concern and unlikely to occur in areas identified for development (Table 6-3).

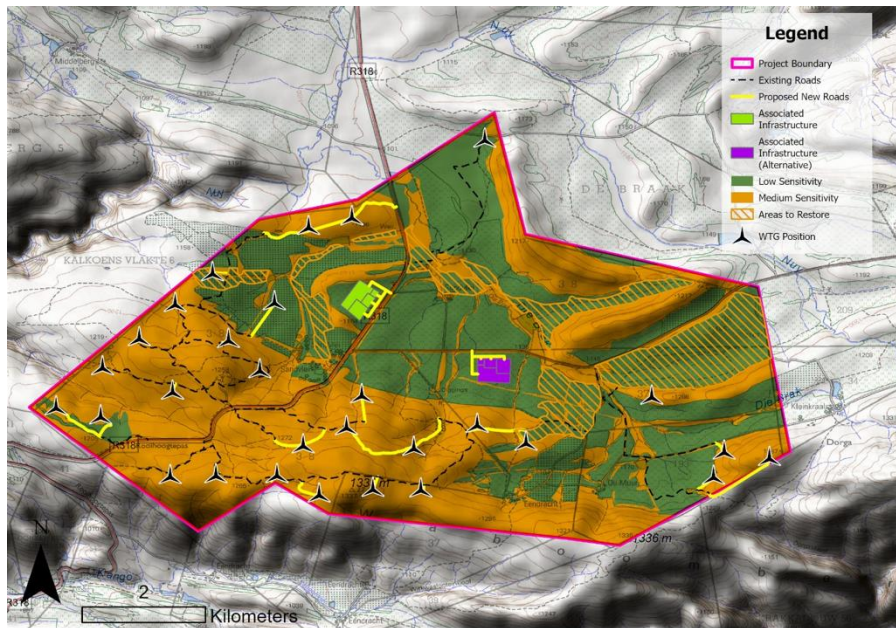
**TABLE 6-3 SPECIES OF CONSERVATION CONCERN CONFIRMED OR POTENTIALLY PRESENT ACROSS THE STUDY AREA**

Family	Common Name	Scientific Name	Status	Habitat	Source	Probability	Justification
Leporidae	Riverine Rabbit	<i>Bunolagus monticularis</i>	Critically Endangered	Low-lying scrub	Screening Tool	Confirmed	N/A
Bovidae	Grey Rhebok	<i>Pelea capreolus</i>	Near Threatened	Scrub, rocky hills and	Desktop Study	Confirmed	N/A

Family	Common Name	Scientific Name	Status	Habitat	Source	Probability	Justification
				modified fields			
Felidae	Leopard	<i>Panthera pardus</i>	Vulnerable	Scrub and rocky slopes	Desktop Study	High	Site located near suitable habitat of wide-ranging species
Lycenidae	Caledon Copper	<i>Aloides caledoni</i>	Least Concern	Rocky cliffs and mountain peaks	Screening Tool	Low-Medium	Small development area relative to potential habitat availability

The sensitivity mapping exercise resulted in areas of remaining natural/near-natural vegetation categorized as medium sensitivity based on condition and connectivity across the site (Figure 6-9). Heavily modified agricultural fields were categorized as low sensitivity, except in areas where their presence was undesirable from an overall ecological connectivity perspective, and a medium sensitivity categorization was retained.

FIGURE 6-9 SITE SENSITIVITY MAP FOR ANIMAL SPECIES OF CONSERVATION CONCERN



### 6.1.8 AVIFAUNA

#### 6.1.8.1 STUDY AREA

Bird habitat in the region consists of Matjiesfontein Shale Renosterveld but dominated agriculturally modified areas that fragment the natural vegetation. Low rocky ridges provide



perch sites and topographic highs for soaring birds. The agricultural fields are rarely punctuated by small trees that grow around water points. Few grasses are found, with the main land use being sheep farming. Some of the large farm dams provide ideal habitat for the Blue Cranes that are common throughout the area on the agricultural lands.

Power lines run north of the proposed site (through the Hugo site) while small stands of mature poplars occur in water courses outside the study areas. Both artificial habitats provide unexpected nesting habitat for large eagles while, surrounding cliffs, also off site, provide suitable breeding cliffs for Verreaux's Eagles.

#### 6.1.8.2 SCREENING STUDY

The initial assessment of the Khoe site combined the SABAP2 records (n = 80 cards from 14 pentads) and the results of first bird surveys in January 2022. This revealed:

- 206 species of bird have been recorded by SABAP2 data around the site;
- 21 of these species are Priority (top 100) collision-prone species;
- 7 of the 21 Priority Collision-prone species are Red Data (RD) species from SABAP2 data;
- Four of the 7 Red Data species likely to occur (SABAP2) was recorded over the proposed Khoe site (Table 6-4); and

The position of a Verreaux's Eagle nest was supplied to by an I&AP, and is plotted in the Figure 6-11 below.

All (21) Priority collision-prone species in the top 100 Priority species including the (10) Red Data birds (in red) recorded in bird atlas data (2008-2022) around the proposed KHOE WEF site. The (4) grey-shaded species occurred in the proposed WEF in our January 2022 site visit. Those with reporting rates over 10% are regarded as relatively regular visitors to the area. (Table 6-4).

TABLE 6-4 PRIORITY COLLISION-PRONE SPECIES

Common name	Scientific name	Red-list status	Reporting Rate*	Susceptibility to:	
				Collision Rank**	Disturbance
Verreaux's Eagle	<i>Aquila verreauxii</i>	Vulnerable	26%	2	Moderate
Martial Eagle	<i>Polemaetus bellicosus</i>	Endangered	9%	5	High
Black Harrier	<i>Circus maurus</i>	Endangered	19%	6	High
Blue Crane	<i>Anthropoides paradiseus</i>	Near Threatened	27%	11	Moderate
Lanner Falcon	<i>Falco biarmicus</i>	Vulnerable	14%	22	moderate
African Fish Eagle	<i>Haliaeetus vocifer</i>	Least Concern	15%	27	moderate
Southern Black Korhaan	<i>Afrotis afra</i>	Vulnerable	21%	35	Low
Cape Eagle Owl	<i>Bubo capensis</i>	Least Concern	5%	41	Moderate
Jackal Buzzard	<i>Buteo rufofuscus</i>	Least Concern	49%	42	Low
Peregrine Falcon	<i>Falco peregrinus</i>	Least Concern	6%	45	moderate

				<b>Susceptibility to:</b>	
Booted Eagle	<i>Aquila pennatus</i>	Least Concern	19%	55	Low
Karoo Korhaan	<i>Eupodotis vigorsii</i>	Near Threatened	50%	49	Low
Steppe Buzzard	<i>Buteo vulpinus</i>	Least Concern	11%	67	Low
Pale Chanting Goshawk	<i>Melierax canorus</i>	Least Concern	44%	73	Low
African Harrier Hawk	<i>Polyboroides typus</i>	Least Concern	14%	85	Low
Spotted Eagle Owl	<i>Bubo africanus</i>	Least Concern	12%	100	low

### 6.1.8.3 SENSITIVITY

The Khoe study is ranked as low sensitivity from a national avifaunal perspective. However, the DFFE Screening tool

[https://screening.environment.gov.za/screeningtool/#/app/screen\\_tool/Wind](https://screening.environment.gov.za/screeningtool/#/app/screen_tool/Wind) did not support this classification, as it ranked the area as High Sensitivity for the Animal Species Theme. The main reason for the triggered high sensitivity was the presence of Vulnerable Verreaux's Eagles *Aquila verreauxii*.

This was verified during the field work in which Verreaux's Eagles were recorded just outside the eastern boundary of the site in the Scoping study and an (inactive) Martial Eagle nest about 3.5 km west of the western boundary was located in February 2022.

While Black Harriers were not recorded on the Khoe site in the Scoping Report they were subsequently recorded in more appropriate seasons (spring), and this verifies:

- The SABAP2 data Reporting Rate suggesting birds will occur with 19% likelihood; and
- the Black Harrier Habitat Suitability Model (HSM: In Simmons et al. 2020) predicts that the habitat in the western section has a 20-40% probability of holding breeding Black Harriers.

This Endangered species was incorporated into the risk assessment undertaken by the CRM.

The DFEE Screening Tool Theme for Wind energy facilities and Birds ranked the area as Low Sensitivity. Thus, while the Birdlife Sensitivity Map concurs with the DFFE Screening Tool for Wind energy facility and birds, both disagree with the Screening Tool output for the Animal Theme. We agree with the Animal Theme that the site is of High Sensitivity given the number of Red Data species.

### 6.1.8.4 COLLISION PRONE SPECIES

Of the eight Red Data species the most frequently encountered species was the Blue Crane which performed 93% of all flights recorded over the wind farm over 12 months. Verreaux's Eagle was the next most common species recorded and both species combined accounted for 98% of all flights (Table 6-5). The Passage Rate for all Priority species was 2.55 flights per hour of which the RD species were the major component at 2.18 flights per hour.

All Collision Prone species (ordered from most to least likely) including RD species and their individual Passage Rates (flights/hour) on the Khoe WEF and Control sites. Note that only

seven with sufficient data could be included in the CRM. Those species with fewer than four flights did not reach the threshold for inclusion.

**TABLE 6-5 COLLISION PRONE SPECIES**

Species	WEF flights	Species Passage Rates	Control flights	Species Passage Rates	Collision Rank
Number of hours	465 h		62.5 h		
Verreaux's Eagle VU	52	0.11			2
Martial Eagle EN	5	0.01			5
Black Harrier EN	8	0.02			6
Ludwig's Bustard EN	2	0.00			10
Blue Crane NT	940	2.02			11
Lanner Falcon VU	4	0.01			22
African Fish Eagle	0	-	1	0.02	27
Black Korhaan VU	1	0.00			35
Jackal Buzzard	50	0.11	1	0.02	42
Peregrine Falcon	3	0.01			45
Karoo Korhaan NT	2	0.00			49
Booted Eagle	48	0.10	1	0.02	55
Yellow-billed Kite	2	0.00			60
Pale Chanting Goshawk	29	0.06	10	0.2	73
Grey-winged Francolin	2	0.00			82
African Harrier Hawk	5	0.01			85
Black-winged Kite	7	0.02			96
Greater Kestrel	1	0.00			97
Spotted Eagle Owl	1	0.00			100
Totals: 8 RD species 11 LC species	1,014	2.18 flights/h	13	-	
	148	0.31 flights/h		0.26 flights/h	
All Priority species (n = 19)	1,162	2.49 flights/h			

#### 6.1.8.5 BLUE CRANES AND VERREAUX'S EAGLES

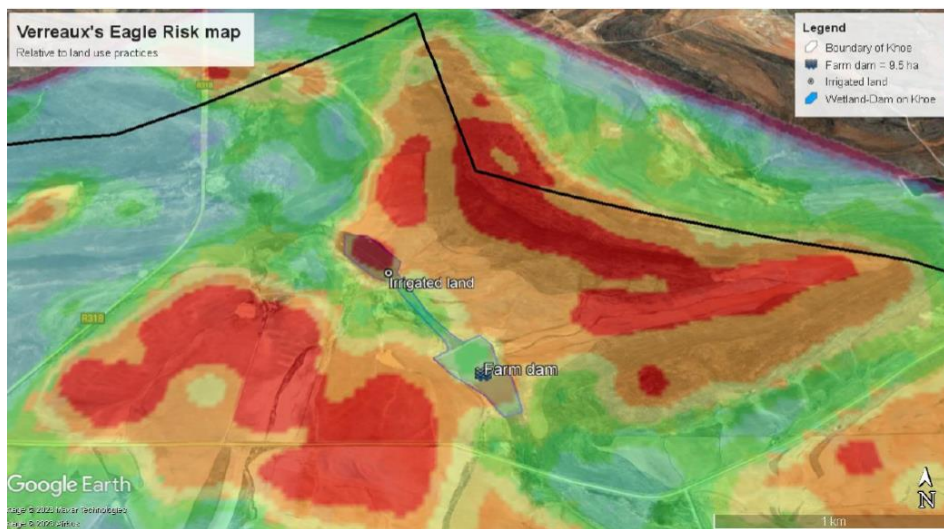
Blue Cranes were the most common species encountered on site and were present on the agricultural field in pairs and threesomes (adults with a youngster). A centrally placed dam in

the centre of the site was also a mecca for other cranes, that habitually came to roost there. Roosting cranes frequently travel some distance to water as a protection against terrestrial predators (Allan 2005). This dam will, thus, increase the presence of Blue Cranes here.

It was also noted that the dam was one of the foci for the risky flight paths highlighted by the CRM output for the Verreaux's Eagles on Khoe WEF.

Figure 6-10 displays the individual CRM map output for Verreaux's eagles. note the high use (= red polygons) of the highland ridge to the north, and the overflights of the 9.5 ha farm dam. and the irrigated land to the north. thus, the eagles were using the ridges as expected but also foraging over the dam and lands to the west.

**FIGURE 6-10 INDIVIDUAL CRM MAP OUTPUT FOR VERREAUX'S EAGLES IN THE NORTHERN SECTION OF THE KHOE STUDY SITE**



#### 6.1.8.6 NEST BUFFERS

Of the 29 proposed turbines, all avoid the riskiest areas predicted by the CRM. Note that some of them fall within the 3.7 km Verreaux's Eagle circular nest buffer, (Figure 6-11) but no risk areas were identified for eagles within the sliver of the buffer inside the south-west boundary. For this reason, the CRM results were favoured as more precise than the coarse buffer approach. From the spatially explicit CRM for the RD and LC species combined (Figure 6-12), the area lost to development is approximately 2,739 ha of the 4,113 ha site (66.6%). Thus about 1,374 ha remain for development or ~33% of the area.

FIGURE 6-11 FLIGHT RISK MODEL VULNERABILITY MAP FOR FOUR RD SPECIES

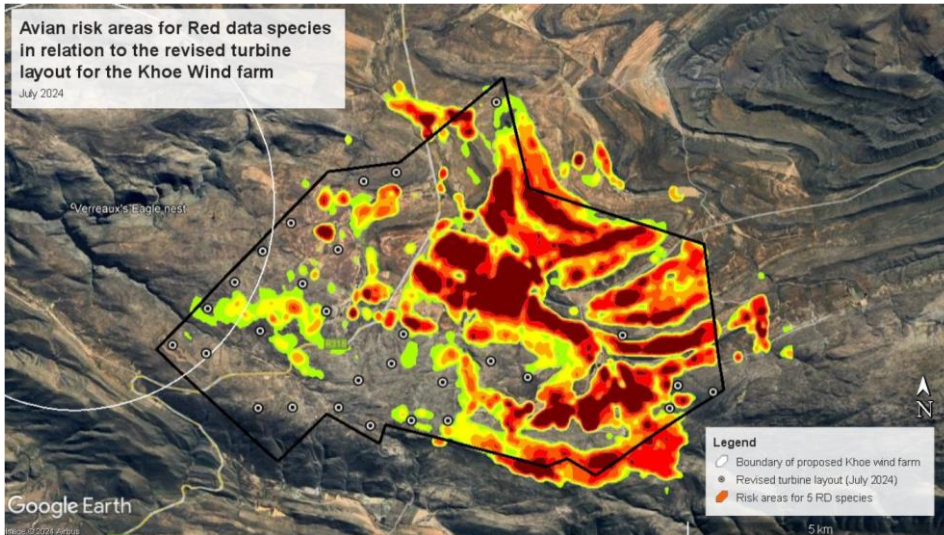
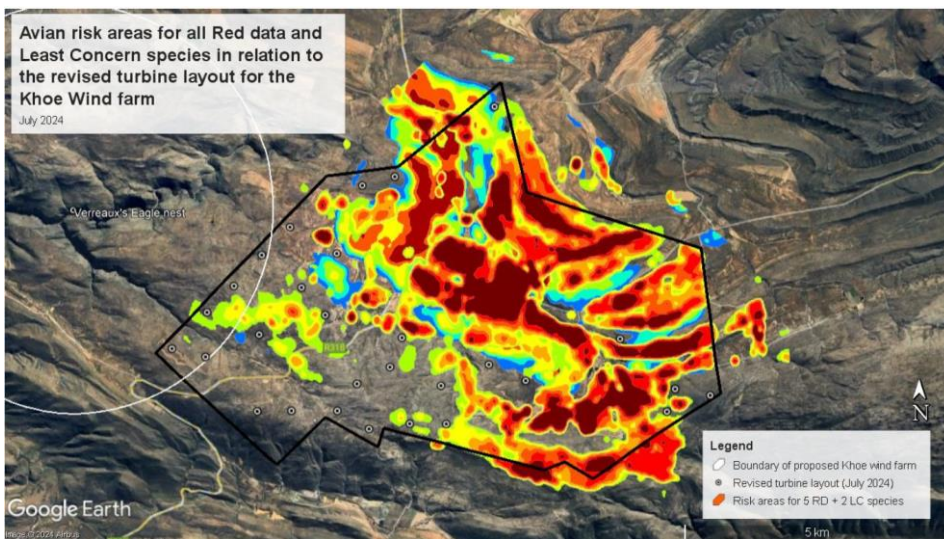


FIGURE 6-12 THE COMBINED CRM RISK VULNERABILITY MAP FOR THE FOUR RD AND TWO LC SPECIES



6.1.8.7 SUMMARY OF CRM

- Of the nine Priority species recorded on the proposed Khoe wind energy facility, six (4 RD and 2 LC) had sufficient data to allow collision risk assessments to be undertaken.
- Most RD species' risky flight minutes could be captured by setting the No-Go areas for wind turbines at the Class level 5.0 and above.



- Most of these higher risk areas for the RD species were clustered together in the east, north-eastern, and central areas of the proposed wind farm, allowing us to reduce risk (by about 70%) for these species (by designating them No-Go for turbine development).
- The majority of higher risk areas for the LC species were clustered together in the central and north areas of the proposed wind farm, allowing us to reduce risk (by about 50%) for these species (by designating them No-Go for turbine development).
- There was considerable overlap between the spatially explicit risk maps for RD and LC species making it easier to designate areas of high-risk for both groups of Priority birds.
- All turbines (100% of 29) in the final layout were placed by the developer outside the high-risk areas revealed by the CRM.

## 6.2 NOISE

Most dwellings featuring in the vicinity of the project focus area are scattered in a heterogeneous fashion, typical of a rural farming area. Croplands, animal husbandry and limited residential activities (farmers and workers with their families) are predominant in the study area.

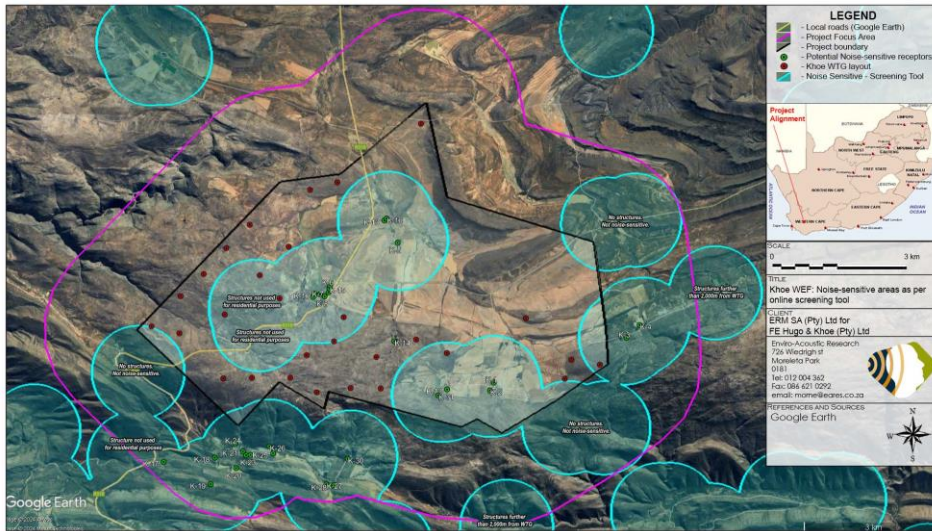
The R318 transects the Project Focus Area (PFA) in a north to/from the south-west, though traffic on this road is generally very low. Noise from vehicular traffic will not be considered in this ENIA report. There are a number of small access roads leading from the R318, mainly to serve the farmers in the area. Traffic volumes on these small access roads are low and will be of no acoustical significance.

There are a number of small access roads leading from the R318, mainly to serve the farmers in the area. Traffic volumes on these small access roads are low and will be of no acoustical significance.

Potential Noise-sensitive receptors (NSR) were initially identified using aerial images, as well as the DFFE Screening Tool, with the statuses of the NSR verified during the site visit in December 2022 and September 2023, refer to Figure 6-13 below. The NSR as identified were given buffers of either 500 m, 1,000 m or 2,500 m. Generally, noise from wind turbines, depending on the layout, as well as the specific sound power emission levels of the selected wind turbine:

- Could be significant within 500 m, with receptors staying within 500 m from operational wind turbines subject to noises at a potentially sufficient level to be considered disturbing.
- Are normally limited to approximately 1,000 m from operational wind turbines. Night-time ambient sound levels are elevated, and the potential noise impact might be measurable. Cumulative noises from multiple wind turbines surrounding an NSR may be high and exceed 45 dBA.
- May be audible up to 2,500 m at night.
- Are generally of a low concern at a distance greater than 2,500 m.

**FIGURE 6-13 POTENTIAL NOISE-SENSITIVE RECEPTORS (NSR) IDENTIFIED BY THE DFFE SCREENING TOOL**



The following was highlighted:

- NSR K-14 is mainly a structure used for storage and bathroom, with the area used occasionally for camping by the land owner (family and friends). The potential noise levels were calculated for this location, but the probability of a noise impact occurring set to 1; and
- the Leeuwenboschfontein Observatory raised a concern about potential light pollution, and the EAP asked that this receptor be added to the list of NSR. This receiver however is well further than 5,000 m from the closest WTG and noises from WTG will definitely be well less than 20 dBA. The significance of a noise impact at this receiver would be low. This receiver was therefore not included as an NSR in this assessment.

Considering the average fast-weighted sound level data collected in the area, average:

- daytime fast-weighted sound levels ranged from less than 20.0 to more than 75.0 dBA, with average sound levels being 43.7 dBA. The average equivalent level over the full daytime periods is 54.9 dBA for the 6 measurement locations. Only considering the average fast-weighted values, sound levels are typical of a rural noise district, setting a zone sound level of 45 dBA for the daytime period; and
- night-time fast-weighted sound levels ranged from less than 20.0 to more than 75 dBA, with average sound levels being 33.1 dBA. The average equivalent level over the full night-time periods is 47.8 dBA for the 6 measurement locations. Only considering the average fast-weighted values as well as the developmental character of the area, a zone sound level of 35 dBA would be used (typical of a rural noise district).

**FIGURE 6-14 PROJECT LAYOUT, PROPOSED ROADS AND OTHER INFRASTRUCTURE LOCATIONS FOR KHOE WEF**



### 6.3 BATS

The site is covered in typical Matjiesfontein Shale Renosterveld, South Langeberg Sandstone Fynbos, and North Langeberg Sandstone Fynbos. Although the natural vegetation does not support trees, there are limited trees situated in the non-perennial riverbeds and clumps of large trees near farm dwellings, which could provide roosting opportunities for bats that prefer roosting in vegetation or under the bark of trees. There are also areas with numerous termite/ant hills, which indicate an abundance of food for bats during certain times of the year.

The proposed wind farm falls within the distributional ranges of six bat families and approximately 12 bat species. Table 6-6 is informed by the most recent distribution maps of Monadjem et al. (2020) and will be updated as required, based on the outcomes of the monitoring programme.



Of the 12 bat species that have distribution maps overlaying the proposed development area, three have a Near Threatened status one a Vulnerable conservation status in South Africa, while two have a global conservation status of Near Threatened. The Long-tailed serotine, the Angolan wing-gland bat and Cape horseshoe bat are endemic to Southern Africa and have limited suitable habitat left, mainly due to agricultural activities (Monadjem 2020).

The latest Pre-Construction Guidelines identify the likelihood of fatality risk (MacEwan et al 2020). Based on this, six species have a high risk of fatality due to their foraging habits at high altitudes, namely Egyptian free-tailed, Roberts's flat-headed bat, Cape roof bat and Natal long-fingered bat. The two fruit bat species, African straw-coloured fruit bat and Egyptian rousette also have a high risk of fatality, while Temminck's myotis bat has a medium-high risk, and Long-tailed serotine has a medium risk of fatality.

The two fruit bats are not expected to roost on the project site itself. Due to the lack of fruit trees in the area, this environment is not their preferred habitat. However, the proximity of the mountains around the site, the agricultural activities of the Hex River Valley situated in the north-westerly direction, and the presence of water sources in the area, might attract fruit bats if they migrate over the area. The possibility that they could sporadically be present in the development area should not be ruled out.

Geoffroy's horseshoe bat was recorded in the surrounding area, but not on the Khoe terrain. There is a high likelihood that some of the bat species belonging to the genus *Rhinolophus* might occur in the more densely vegetated valleys. As indicated by Table 6-6 these bats are clutter foragers and have a low likelihood of fatality risk

TABLE 6-6 POTENTIAL BAT SPECIES OCCURRENCE ON THE PROPOSED KHOE WEF

Family	Species	Common Name	SA conservation status	Global conservation status (IUCN)	Roosting habitat	Functional group (type of forager)	Migratory behaviour	Likelihood of fatality risk*	Bats confirmed at Khoe and surroundings	Bats recorded on the Khoe project site
PTEROPODID AE	<i>Eidolon helvum</i>	African straw-coloured fruit	Not evaluated	Least Concern	Little known about roosting behaviour	Broad wings adapted for clutter. Studies outside of South Africa list fruit and flowers in its diet.	Migrator. Recorded migration up to 2 518 km in 149 days, and 370 km in one night.	High		
	<i>Rousettus aegyptiacus</i>	Egyptian rousette	Least Concern	Least Concern	Caves	Broad wings adapted for clutter. Fruit, known for eating Ficus species.	Seasonal migration up to 500 km recorded. Daily migration of 24 km recorded.	High		
MINIOPTERID AE	<i>Miniopterus natalensis</i>	Natal long-fingered bat	Least Concern	Least Concern	Caves	Clutter-edge, insectivorous	Seasonal, up to 150 km	High	✓	✓

Family	Species	Common Name	SA conservation status	Global conservation status (IUCN)	Roosting habitat	Functional group (type of forager)	Migratory behaviour	Likelihood of fatality risk*	Bats confirmed at Khoe and surroundings	Bats recorded on the Khoe project site
NYCTERIDAE	<i>Nycteris thebaica</i>	Egyptian flit-faced bat	Least Concern	Least Concern	Cave, Aardvark burrows, road culverts, hollow trees. Known to make use of night roosts.	Clutter, insectivorous, avoid open grassland, but might be found in drainage lines	Not known	Low		
MOLOSSIDAE	<i>Tadarida aegyptiaca</i>	Egyptian free-tailed bat	Least Concern	Least Concern	Roofs of houses, caves, rock crevices, under exfoliating of rocks, hollow trees	Open-air, insectivorous	Not known	High	✓	✓
	<i>Sauromys petrophilus</i>	Robert's Flat-faced	Least Concern	Least Concern	Narrow cracks, under exfoliating of rocks, crevices.	Open-air, insectivorous		High	✓	✓
RHINOLOPHIDAE	<i>Rhinolophus capensis</i>	Cape horseshoe bat (endemic)	Near Threatened	Near Threatened	Caves, old mines. Night roosts used	Clutter, insectivorous	Not known	Low		

Family	Species	Common Name	SA conservation status	Global conservation status (IUCN)	Roosting habitat	Functional group (type of forager)	Migratory behaviour	Likelihood of fatality risk*	Bats confirmed at Khoe and surroundings	Bats recorded on the Khoe project site
	<i>Rhinolophus clivosus</i>	Geoffroy's horseshoe bat	Near Threatened	Least Concern	Caves, old mines. Night roosts used	Clutter, insectivorous		Low	✓	
VESPERTILIONIDAE	** <i>Laephotis capensis</i> ( <i>Neoromicia capensis</i> )	Cape roof bat (Cape serotine)	Least Concern	Least Concern	Roofs of houses, under bark of trees, at basis of aloes	Clutter-edge, insectivorous	Not known	High	✓	✓
	<i>Myotis tricolor</i>	Temminck's myotis	Near Threatened	Least Concern	Roosts in caves, but also crevices in rock faces, culverts, and manmade hollows	Limited information available	Not known	Medium-High		
	<i>Eptesicus hottentotus</i>	Long-tailed serotine (endemic)	Least Concern	Least Concern	Caves, rock crevices, rocky outcrops	Clutter-edge, insectivorous	Not known	Medium	✓	✓
	<i>Cistugo seabrae</i>	Angolan wing-gland bat (endemic)	Vulnerable	Near Threatened	Possibly buildings, but no further information	Clutter-edge, insectivorous	Not known	Low		

\*Likelihood of fatality risk as indicated by the Pre-Construction Guidelines (MacEwan et al. 2020b).

\*\**Neoromicia capensis* has been reclassified as *Laephotis capensis* (Cape roof bat).

Cape roof bat is the most abundant species (55%). In total 37% of the calls are those of the high-flying Egyptian free-tailed bat, which has a narrow wing morphology adapted for open air. 4% of Natal long-fingered bat, 3% of the Robert's Flat-faced, and a statistically insignificant number of the endemic Long-tailed serotine have also been recorded.

On 11 March 2023, a point source was deployed at the dam near the Sandvlei farm dwellings. Only four calls of Cape roof bat were recorded, but this confirms the presence of this species at Sandvlei. Further point sources at Sandvlei, on the eastern side of the R318 road, were deployed in April 2024, but no further bat calls were recorded.

Higher activity was portrayed approximately two hours after sunset, when bats emerge to forage and drink water, with a peak in activity around three hours after sunset. Steady high activity occurs for the first seven hours after sunset, between 21:00 and 00:00, and a significant decline in activity is shown from midnight to approximately two hours before sunrise. Note that these figures are a summary of all seasons and thus a generalisation. These patterns are of importance if mitigation measures are to be developed, as they indicate the most active periods during the night.

## 6.4 SOCIO-ECONOMIC

The study area is located within the Langeberg Local Municipality, which forms part of the Cape Winelands District Municipality. The Cape Winelands District Municipality (WDM) is a category C municipality that is made up of five local municipalities namely, Breede Valley, Drakenstein, Langeberg, Stellenbosch and Witzenberg municipalities. The town of Montagu is the administrative seat of the LM.

### 6.4.1 POPULATION

The 2020 Socio-Economic Profile (SEP) for the Langeberg Municipality (LM) prepared by the Western Cape Department of Social Development, indicates that the population of the LM in 2020 was 118,434 making it the second most populated municipality in the Winelands district Municipality. The population is projected to be 126,640 by 2024 which equates to a 1.7% annual average growth rate. Based on the 2022 Census data the population of the LM was 94,045, which is lower than the SEP figure and raises concerns about the accuracy of the 2022 Census data. The total number of households was 25,370, with an average household size of 3.7, slightly lower than the 3.9 figure for 2011.

Based on the SEP, young children under the age of 15 made up 29% of the population, the working age cohort (15-64) made up 65% and people 65 years and older made up 6%. Based on these figures the dependency ratio was 54%. Based in the data from Census 2022, children under the age of 15 made up 22.6%, the working age cohort (15-64) made up 69.7% and people 65 years and older made up 7.6%. Based on these figures the dependency ratio was 43.4%. The higher the dependency ratio the larger the percentage of the population dependent on the economically active age group. This in turn translates reduced revenue for local authorities to meet the growing demand for services. The difference between the 2020 SEP and 2022 Census data is therefore a concern.

The available 2022 Census data does not provide information on race groups or language. Based on the 2016 Community Household Survey Coloureds made up 75%, followed by Black Africans (17%) and Whites (12%). The main first language spoken was Afrikaans (80%), followed IsiXhosa (13%) by English (3%) (Community Household Survey 2016).

### 6.4.2 HOUSEHOLD TYPES

There were a total number of 236,480 (2020) and 30,690 (2020) households in the Cape Winelands District and Langeberg Local Municipality respectively. Of these, 91.3% (Langeberg Local Municipality) and 82.4% (Cape Winelands District) were formal main dwellings. Approximately 2.3% of the structures in the Langeberg Local Municipality and 10.8% in Cape Winelands District were shacks. Most dwellings in the Langeberg Local Municipality and Cape Winelands District are therefore formal structures. In 2016, 46% of the properties in the Langeberg Local Municipality were owned and fully paid off, while 9% of properties were occupied rent free. In the Cape Winelands District, 2016 figures indicated that 17% of properties were occupied rent free (Community Survey, 2016). In 2016, it was reported that approximately 31.6% of the households in the Langeberg Local Municipality and 34.19% of the households in Cape Winelands District were headed by women (Community Survey, 2016). These figures are lower than the Western Cape provincial rate of 38.04% (Community Survey, 2016). Despite the figures for the Langeberg Local Municipality being lower than the district and provincial percentages, women headed households tend to be more vulnerable.

### 6.4.3 HOUSEHOLD INCOME

At the time of preparing the report no data on household income was available from the 2022 Census. The data is therefore still based on 2011 Census. Based on this data, 10% of the population of the LM had no formal income, 2% earned less than R 4,800, 4% earned between R 5,000 and R 10,000 per annum, 16% between R 10,000 and R 20,000 per annum and 25% between R 20,000 and R 40,000 per annum (2011).

The poverty gap indicator produced by the World Bank Development Research Group measures poverty using information from household per capita income/consumption. This indicator illustrates the average shortfall of the total population from the poverty line. This measurement is used to reflect the intensity of poverty, which is based on living on less than R3,200 per month for an average sized household (~ R 40,000 per annum). Based on this measure, in the region of 57% of the households in the LM live close to or below the poverty line. The figures for the Cape Winelands District Municipality and Western Cape were 53.7% and 50.1% respectively. The low-income levels reflect the limited employment opportunities and dependence on the agricultural sector. This is also reflected in the high unemployment rates. The low-income levels are a major concern given that an increasing number of individuals and households are likely to be dependent on social grants. The low-income levels also result in reduced spending in the local economy and less tax and rates revenue for the LM. This in turn impacts on the ability of the LM to maintain and provide services.

### 6.4.4 EMPLOYMENT

The 2020 SEP for the LM Municipality notes that the unemployment rate in the LM has been between 4.1 and 7.2% over the last 10 years and was 7.2% in 2019. The figures are lower than WDM and provincial figures over the same period. The figure for the Western Cape in 2020 was 18.9%.

### 6.4.5 EDUCATION

Based on the information contained in the SEP, the matric pass rate in the LM was 73.8% in 2020, down from 79% in 2019 and 79.5% in 2018. After the Witzenberg and Breede Valley Municipality, the LM had the lowest matric pass rate in the WDM in 2020.

## 6.5 HERITAGE AND ARCHAEOLOGY

In 2012 ACO Associates conducted an archaeological assessment prior to the raising of the Keerom Dam wall, west of the WEF site (Halkett, 2012). Although the assessment recorded several stone age artefacts around the periphery of the dam, "the majority of these are isolated finds (probably Early Stone Age (ESA) or Middle Stone Age (MSA)) amongst which no diagnostic formal elements were noted" (Halkett 2012:8).

Kaplan undertook two archaeological assessments to the north-east of the Khoe WEF. In 2010 he surveyed an area at Nougá proposed for agricultural expansion and recorded large numbers of stone artefacts dating from the Middle (MSA) and Later Stone Ages (LSA). He also located what he referred to as a LSA factory site with many stone artefacts, including several formal tools (Kaplan 2010).

In a survey for the proposed Vredefort solar energy facility south of Touws River, Kaplan (2015) found a widespread background scatter of mainly MSA lithics of the sort that is common in the Karoo. It is important to note that both of Kaplan's study areas were on a plain and located about 350 m lower than the mountainous and hilly Khoe WEF study area.

Most recently, Orton (2022) conducted an archaeological assessment for the proposed Ezelsjacht WEF which is located a little more than 1 km north of the Khoe WEF. The results of Orton's (2022) survey for the Ezelsjacht WEF reflected the well-established finding that archaeological materials and sites are not common in high-lying terrain, with only a few archaeological sites found. The most important was a LSA site with several retouched stone artefacts, and a scatter of LSA materials in a small dune field. Orton (2022) also reported some historical archaeological resources comprising mainly stone-walled kraals.

Due to the geology of the Karoo, caves and rock shelters are very rare and this means that most Karoo archaeological sites are open sites containing principally stone artefacts. Ostrich eggshell is sometime preserved and, occasionally, pottery on recent sites, but bone is rarely preserved except in rare, stratified contexts. Sites span the full range from the Early and Middle Stone Ages to the contact period between the Later Stone Age inhabitants of the region and the incoming European colonists within the last two centuries.

Potentially archaeologically sensitive areas in the landscapes like that of the Khoe WEF include:

- Springs, pans and watercourses which were a focus for human activity in the past, and prehistoric and colonial-era archaeological sites may be found around them.
- Outcrops of suitable stone which were quarried for tool making raw material during the Early, Middle and Later Stone Ages.
- Any accessible rock shelter or overhang on the skirts or slopes of hills and mountains. These have the potential to contain rock paintings and/or archaeological deposit.
- Rocky outcrops and boulders (particularly where dolerite is present), which may contain pre-colonial and, in some instances, historical rock engravings.

Evidence from other parts of the South African interior (see for example, Webley & Hart 2010, Van der Walt 2016, Orton 2017, Gribble 2022) indicates that the bulk of archaeological material and sites are in the river valleys. The higher ground like that to be occupied by the much of the Khoe WEF infrastructure is exposed and remote from resources such water, and the presence of archaeological sites and material in such areas is the exception rather than the rule.

### 6.5.1 HISTORICAL BUILT ENVIRONMENT

According to the National Heritage Resources Act, any built structure older than 60 years is historical and enjoys protection under the Act.

Available historical survey diagrams for the farms within the Khoe WEF footprint indicate that their parent farms were well-established by the second half of the 19th century, and it is highly likely that the area had in fact been used and settled by farmers of European descent at least a century before.

The earliest colonial use of this area would have been for seasonal transhumant grazing. This was followed by a formal but still haphazard system of loan farms, where a farmer could rent an area of land, usually centered on a spring or water source, from the authorities at the Cape for a nominal annual fee. After the permanent British occupation of the Cape in the early 19th century, land tenure was formalised into a system of quitrents that resulted in the land divisions in the area that are in place today.

This long temporal span of agricultural use of the land suggests that there will be historical buildings and structures on particularly the older farms portions in the area. A comparison of the earliest 1:50,000 topographic map sheet for the area, which dates from 1969, with modern satellite imagery in a GIS indicates that the farming settlement nodes at Sandvlei (1/38), Sandvlei (11/38), Ou Muur (Farm Re 193) and Eendracht (Re 37) were already established in the 1960s and are thus likely to contain historical structures.

#### 6.5.1.1 GRAVES AND BURIALS

This area has been formally settled by farmers of European descent since at least the mid-19th century, and less formally for longer than that. The historical farm complexes in the WEF area, and potentially also any older, abandoned settlement nodes, can be expected to have cemeteries associated with them, although a review of satellite imagery for this report did not find any clear evidence for such.

Pre-colonial graves could occur almost anywhere in the WEF area, but the remote and mountainous nature of much of the wind energy facility footprint suggests that they are unlikely in those areas. Such burials are seldom marked, except possibly by a cairn of stones, and often occurred in places like riverbanks, where soft sand made burial easy.

#### 6.5.1.2 CULTURAL LANDSCAPE

The area proposed for the Khoe WEF is remote and the landscape is largely natural and with only a light cultural overlay comprised of features - fences, wind pumps, farm roads and occasional farm complexes - which reflect the historical and modern use of the area for agriculture.

In their Inventory and Policy Framework for Heritage and Scenic Resources, Winter and Oberholzer (2013) identified the Rooihogte Pass / Burger's Pass, built by Thomas Bain and dating to 1877, as having "high historical, technological and scenic value". A portion of the pass falls within the southern half of the Khoe WEF footprint. They also define the R318, which is straddled by the Khoe WEF as a "scenic / linking route of secondary importance".

Although the cultural landscape of the Khoe WEF is generally only lightly developed, it does contain a number of identified features of significances, and the construction of the WEF in this landscape will alter its visual character in particular.



## 6.6 PALAEOLOGY

A study conducted for the proposed Ezelsjacht WEF to the north of the Khoe WEF, indicate that the proposed Khoe WEF is underlain by several coastal to shallow marine formations of the Table Mountain and Bokkeveld Groups of the Cape Supergroup, of Early to Middle Devonian age (c. 410 – 390 Ma). It was during this period that the first terrestrial plants, bony fish and insects evolved and spread on the land, from precursors in the seas.

Although southern Africa, then located in the middle of Gondwanaland, was positioned over or close to the South Pole and was covered by a series of ice sheets (Visser, 1989; Isbell et al., 2012), some of the fine-grained shallow water and marginal mudstones and siltstones have fossils preserved within them (Plumstead, 1969; Theron, 1972; MacRae, 1999; Thamm and Johnson, 2006; Penn-Clarke et al., 2018). With the repeated cycles of sea level rise and fall and resulting shifts from marine to shoreline to fluvial and delta settings and back again, there is a complex series of environments with the resident faunas.

The Ordovician lower Table Mountain Group preserves trace fossils, and invertebrates such as brachiopods, trilobites, eurypterids, conodonts and chitinozoans. There are records of invertebrate fossils, known as the Malvinokaffric Faunal Assemblage, in the Silurian – early Devonian upper Nardouw Subgroup and the whole of the Bokkeveld Group, while the Witteberg Group has records of fish and plants as well as invertebrates such as brachiopods, bivalves, gastropods and trilobites. More recent research has shown that the Malvinokaffric fauna of Gondwanaland (Bokkeveld Group) is somewhat different from the northern hemisphere fauna (Penn-Clarke et al., 2018b).

The Ceres Subgroup has abundant marine benthic (bottom-dwelling) invertebrate fossils such as brachiopods, bivalves, trilobites, cephalopods, crinoids, ophiuroids, hyoliths, cricoconarids, corals and gastropods (Hiller and Theron, 1988; Theron and Johnson, 1991; Thamm and Johnson et al., 2006; Penn-Clarke et al., 2018a). These marine fossils occur mostly in the mudrock units while plant fossils occur in the sandstone units. Some units also show extensive bioturbation based on the presence of trace fossils of burrows, such as *Planolites*, *Skolithos* and *Arenicolites*.

The assessment for the Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual palaeontological sensitivity of that project area is much lower than indicated on the SAHRA map. According to Almond (2022), none of the fossil sites he recorded in the Ezelsjacht WEF area were very well preserved and all represent common, widely distributed forms, of limited scientific or conservation value.

## 6.7 VISUAL/ LANDSCAPE

The proposed Khoe WEF and associated infrastructure is located approximately 29 km south west of the town of Touws River, 20 km south east from De Doorns and 35 km west of Worcester within the Langeberg Local Municipality within the Western Cape Province.

The study area occurs on land that ranges in elevation from approximately 200 metres above sea level (m asl) in the south west at the base of the Langberg Mountain along drainage lines and in the west along the Hex River to 1,800m asl on the tops of mountain ranges such as Kwadousberg and Langberg. The site itself is located on land with an average elevation of 1,500m asl. Numerous mountain ranges are located within the study area, namely the Hexrivierberge and Kwadousberg in the west, Langberg to the south, Waboosberge to the

south east and Bontberg to the north. Prominent water sources within the study area include the Nuy, Vink, Keisie, Hex Rivers. The Smalblaar and Bok rivers flow into the Verkeerdevlei Dam in the north.

There are three protected areas within the study area, namely the Cape Floral Region Protected Area, Touw Local Nature Reserve and Drie Kuilen Private Nature Reserve which is located approximately 3 km east of the proposed site. The Cape Floral Region is also a World Heritage Site as recognized by UNESCO. Drie Kuilen PNR offers a variety of activities such as game drives, hikes and overnight accommodation.

Numerous non-designated private natures reserves and guest farms are also located within the study area, namely Aquila Private Nature Reserve to the north, Middelberg guest farm, Leeuwenboschfontein guest farm, Porcupine Peak guest farm and the proposed Exemia Private Game Reserve can be found near the centre of the study area. All of these reserves and farms offer tourist accommodation facilities and activities.

It should be noted that while there are existing buildings on the proposed Exemia, the future intent for the property is to develop it into an ecotourism destination consisting of amongst others, a campsite, healing room, wedding venue and other accommodation offerings.

The greater environment with its wide open, undeveloped landscapes is considered to have a high visual quality.

This study area is known as a tourist destination owing to its location within the Cape Winelands, the Cape Floral Region, and the town of Touws Rivier which is located on the Flowers Route. Five tourist accommodation establishments are located approximately 5 km of the proposed WEF, namely, Middelberg Guest Farm, Ezelsjacht Guest Farm, Kamagu Safari Lodge, Matroosberg Stasie and Ratelbosch.

#### **Less than 5km from the wind turbines:**

- Soutrivier (Ezelsjacht guest farm)<sup>42</sup>
- Middelberg Guest Farm (including the camping site, koshuis and Middelberg Self Catering)
- Sandvlei guest farm
- Porcupine Peak guest farm and cottages
- Oumur
- Proposed Exemia Private Nature Reserve - The information was provided by the adjacent landowner, and no development has occurred yet. There are currently no concrete plans for the proposed game reserve.
- Leeuwenboschfontein guest farm
- Kango guest house
- Various including Die Vlei and Hoenderverdors
- Leeuhok
- Drie Kuilen Privte Nature Reserve
- Unknown homesteads
- Observers travelling along the R318 arterial/main road and Nougaspoort Secondary Road

#### **Located within a 5 - 10km radius:**

- Bloekom Huisie
- Leeuwenboschfontein guest farm and potentially the observatory
- Perdefontein

<sup>42</sup> Facilities listed in parenthesis indicate the location of this specific sensitive receptors on other proposed renewable energy facility development sites within the study area. This includes facilities that are already authorized and ones where authorization is still in process.

- Doringkloof
- Pietersfontein (Amani Lodge)
- Riethoek
- Protea Farm
- Koo incl various residences Langdam, Jakkalsvlei guest farms
- Heinzberg
- Various unknown homesteads
- Observers travelling along the R318 arterial/main road

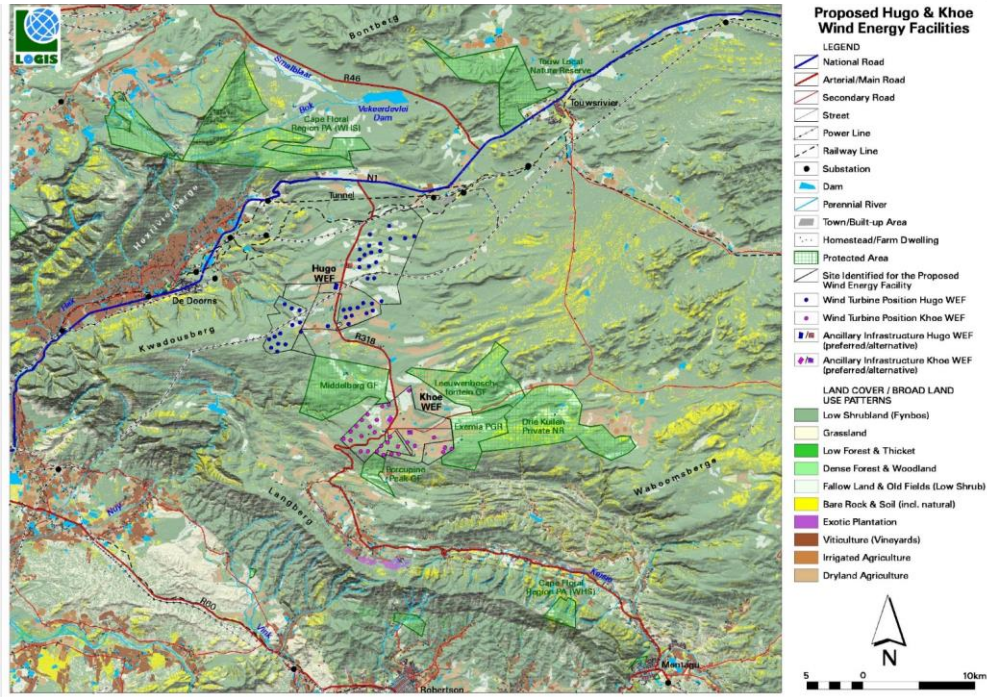
**Located within a 10 - 20km radius:**

- Keerom
- Hoekfontein
- Nauga
- Brakputs
- Gecko Rock private nature reserve
- Brakrivier
- Patatsfontein
- Protea Farm- Populierbos
- Unknown homestead
- Cape Floral Region Protected Area (WHS)
- Observers travelling along the N1 National Road, the R318 and various secondary roads

**Located beyond 20km:**

- Karoo 1 Hotel Village and Africamps
- Vredefort
- Spes Bona
- Merweda
- Vleitjie
- Njalo Njalo Safari
- De Bron
- Excelsior
- Baden
- Bon Accord Cottages
- Kruis
- Knipes Hope
- Scheepersdraai
- Dederheuwel
- Unknown Homesteads

FIGURE 6-15 LAND COVER AND BROAD LAND USE PATTERNS WITHIN THE STUDY AREA



## 6.8 TRAFFIC AND TRANSPORTATION

The hierarchy of the road network in the immediate vicinity of the development site is shown in Appendix C – Existing Surrounding Road Network and summarised below.

- **R318:** R318 is a Class 3 Provincial Main Road (MR00295) that runs in the north-south direction from the N1 near De Doorns through Montagu to R60 near Ashton. The R318 road passes through the Hex River Valley, which is known for its vineyards, fruit farms, and scenic views. The R318 road has a general posted speed limit of 100 km/h and connects to the R62 road, which is a popular tourist route that links Cape Town and Port Elizabeth. The length of R318 in kilometres is 77.4km (Start: Jct N1 De Doorns, End: Montagu);
- **Road OP05748:** Road OP05748 is a Class 5 Provincial Minor Road (gravel access road) which is located to the west of Main Road R318 (MR00295). The length of OP05748 in kilometres is 7.42 km (Start: Jct MR295 on Zout Riviers Berg, End: Property 171 Ezeljagt & 7 De B);
- **Road OP05964:** Road OP05964 is a Class 5 Provincial Minor Road (gravel access road) which is located to the east of Main Road R318 (MR00295). The length of OP05964 in kilometres is 7.55 km (Start: Jct MR295 on Eendragt 38, End: Jct DR1248 on De Braak 7);
- **Road DR01428:** Road DR01428 is a Class 4 Provincial Divisional Road (gravel road) which runs in the east west direction to the east of Main Road R318 (MR00295). The length of Road DR01428 in kilometres is 19.5 km (Start: Jct MR295 Sandvlei, End: Jct DR1411 Nougaspoort);
- **Road OP05963:** Road OP05963 is a Class 5 Provincial Minor Road (gravel access road), which is located to the south of Road DR01428. The length of OP05963 in kilometres is 6.48 km (Start: Jct DR1428 Eendragt 37, End: Lopenderivier); and
- **Road OP05962:** Road OP05962 is a Class 4 Provincial Minor Road (gravel road) which is located to the west of Main Road R318 (MR00295). The length of OP05962 in kilometres is 11.95 km (Start: Jct MR295 Rooihoogste Pass, End: Keerom Boundary Witwater).

The site location and layout are such that two primary roads potentially provide access to the proposed Khoe WEF development being the Main Road R318 (MR00295) and Divisional Road DR01428. Thus, the proposed locations of providing main access to the development are from the existing intersections and accesses off Main Road R318 (MR00295).

Positions of 8 proposed accesses to the site off Main Road R318 (MR00295) are shown in Figure 6-16 comprises of 5 existing farm accesses with 3 new access locations (1,2 and 3) which connect to new internal roads providing access to the associated WEF facility infrastructure located to the west and east of Main Road R318 (MR00295).



FIGURE 6-16 PROPOSED ACCESS LOCATIONS



To understand the effects of additional traffic on the road network, an understanding of existing road network traffic conditions is required. Thus 12-hour manual classified traffic counts were conducted at four (4) key intersection. These traffic counts were carried on Monday, 15 April 2024 between 06h00-18h00.

The volume of traffic on the Main Road R318 is relatively low compared to traffic volumes along the N1 National Road. Similarly, all other roads (Road DR01442, Road OP05749 and Road OP05748) carry significantly very low levels of traffic volumes compared to both Main Road R318 and the N1 National Road.

Traffic flow diagrams representing the 2024 existing traffic count data (total vehicles) are shown in Appendix E – Existing Traffic for the weekday AM peak hour, PM peak hour and 12-hour periods. Observed AM and PM peak hour volumes are summarized below:

- **N1 National Road:** 300 vehicles per hour and 366 vehicles per hour were recorded during the AM peak hour and PM peak hour, respectively, including 56 and 99 heavy vehicles during the respective peak hours.
- **Main Road R318 (MR00295):** 15 vehicles were recorded during the AM peak hour and 8 vehicles were recorded during the PM peak hour. Only 2 heavy vehicles were recorded during the AM peak hours and 0 in the PM peak hour.
- **Road DR01442:** A total of 4 vehicles including heavy vehicles were recorded during the AM peak hour and none during the PM peak hour.
- **Road OP05749:** A single vehicle was recorded in the AM peak hour and none in the PM peak hour.
- **Road OP05748:** There were no vehicles observed during peak periods on Road OP05748
- **Road DR1428:** A very low traffic volume of 6 vehicles were recorded in the AM peak hour with no vehicles recorded in the PM peak hour.

- **Road OP05962:** There were no vehicles observed during peak periods on Road OP05962.

## 7. ASSESSMENT OF THE ALTERNATIVE

In accordance with the requirements of Appendix 1 of the 2014 EIA Regulations (as amended), an assessment report must contain consideration of all alternatives, which can include activity alternatives, site alternatives, location alternatives and the "No Development" alternative. At a minimum, this chapter must address:

- The consideration of the No Development alternative as a baseline scenario;
- A comparison of reasonable and feasible selected alternatives; and
- The provision of reasons for the elimination of an alternative.

Alternatives are required to be assessed in terms of social, biophysical, economic and technical factors.

When assessing alternatives, they should be "practical", "feasible", "relevant", "reasonable" and "viable", and that I&APs should be provided with an opportunity to provide input into the process of formulating alternatives. In this instance, this chapter provides an overview of the alternatives that have been considered for this development.

### 7.1 THE NO DEVELOPMENT SCENARIO OR "NO-GO" OPTION

This scenario assumes that the proposed development does not proceed. It is equivalent to the future baseline scenario in the absence of the proposed development. Relative to the proposed development, the implications of this scenario include:

- The land-use remains agricultural, with no further benefits derived from the implementation of a complementary land use;
- There is no change to the current landscape or environmental baseline;
- No additional electricity will be generated on-site or supplied through means of renewable energy resources. This would have negative implications for the South African government in achieving its proposed renewable energy target, given the need for increased generation;
- There would be a lost opportunity for South Africa to generate renewable energy. This would represent a significant negative social cost;
- There is no opportunity for additional employment (permanent or temporary) in the local area where job creation is identified as a key priority; and
- The national and local economic benefits associated with the proposed project's REIPPPP commitments and broader benefits would not be realised.

The purpose of the proposed development is to generate renewable electricity and export this to the national grid. Other socio-economic and environmental benefits will result from the proposed development such as:

- Reduced air pollution emissions - burning fossil fuels generates CO<sub>2</sub> emissions, which contributes to global warming. Emissions of sulphureous and nitrous oxides are produced, which are hazardous to human health and impact on ecosystem stability.
- Water resource saving – conventional coal-fired power stations use large quantities of water during their cooling processes. WEFs require limited amounts of water during construction and a minimal amount of water during operation. As a water stressed country, South Africa needs to be conserving such resources wherever possible.



- Improved energy security – renewables can be deployed in a decentralised way close to consumers, improving grid strength while reducing expensive transmission and distribution losses. Renewable energy projects contribute to a diverse energy portfolio.
- Exploit significant natural renewable energy resources – biomass, solar and wind resources remain largely unexploited.
- Sustainable energy solutions – the uptake of renewable energy technology addresses the country's energy needs, generation of electricity to meet growing demands in a manner which is sustainable for future generations.
- Employment creation and other local economic benefits associated with support for a new industry in the South African economy.

The development compliments agriculture by providing an additional income source, without excluding agriculture from the land, or decreasing production. Therefore, the negative agricultural impact of the no-go alternative is more significant than that of the development, and so, purely from an agricultural impact perspective, the proposed development is the preferred alternative between the development and the no-go.

If the project were not implemented, then the site would stay as it currently is and likely continue to degrade due to the prevalence of grazing and or erosion within the water courses. This would continue into the long-term with a Low intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and their requirement for grazing areas, coupled to the need access. Many fauna species are to some degree negatively affected by farming including many predators which are targeted due to their negative impact on livestock, while some species may also be vulnerable to habitat loss or degradation and may experience depressed populations within the farming landscape. In terms of vegetation and plant species, extensive grazing may result in changes in composition towards less palatable species and a reduction in plant cover. It is however important to recognise that the development does not represent an alternative to extensive livestock farming, but rather an additional impact and stressor independent of the current land use. Overall, the no-go alternative is considered to result in a low negative impact on terrestrial biodiversity.

Although the proposed development will likely affect the avifaunal community on site, they do not appear to have pushed key species towards extinction in most cases. Furthermore, existing impacts to birds, such as agrochemical poisoning (accidental), fence entanglement, road kill, power line electrocution and collision, disturbance of breeding, subsistence hunting, snaring and others, would not be replaced by the proposed project, they would all still persist in addition to the new impacts associated with the wind farm. The No-Go alternative therefore has much lower impacts on avifauna than the proposed project, and would be preferred from an avifaunal perspective. However, since the No-go constraints/buffers have already been taken into account, and with the recommended mitigation measures implemented going forward, the preference for developing the project is also acceptable.

The primary goal of the project is to assist in providing additional capacity to Eskom to assist in addressing the current energy supply constraints. The 'No Development' alternative would not assist the government in addressing climate change, energy security and economic development. Addressing climate change is one of the benefits associated with the implementation of this proposed development. Climate change is widely considered by environmental professionals as one of the single largest threats to the environment on a local,

national and global scale. Energy supply constraints and the associated load shedding have had a significant impact on the economic development of the South African economy. South Africa also relies on coal-powered energy to meet more than 90% of its energy needs. South Africa is therefore one of the highest per capita producers of carbon emissions in the world and Eskom, as an energy utility, has been identified as the world's second largest producer carbon emissions.

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 significant negative social cost.

**Based on the above, the 'No Development' alternative is not a preferred alternative.**

## 7.2 SITE SELECTION

The Applicant identified the Khoe WEF after conducting a series of pre-feasibility assessments by considering aspects such as climatic conditions (wind speed databases, pre-dominant wind directions), grid connection scenarios, site geography and topography, ecological feature, social environment and site accessibility.

Feasibility studies undertaken by the Project Applicant indicated that the Khoe WEF site is suitable to develop and operate a wind farm as it satisfies the following criteria:

- Feasibility of access for wind turbine delivery as the site is easily accessible from the national road network;
- Viable wind resource;
- The surrounding area is not densely populated;
- The proposed site is largely previously transformed agricultural land and current land use is grazing;
- Willingness of landowner to host a wind farm on their property; and
- No environmental fatal flaws identified in the screening assessment.

The unique features of this site eliminates the possibility of alternatives with similar site conditions. Alternatives are restricted to on-site aspects such as turbine footprints and layouts, roads, and related infrastructure options.

**Although the site is considered fatally flawed from visual aspect, the no development scenario would represent a lost for South Africa to improve energy security.**

**According to all other specialist studies undertaken, the site is suitable for the construction and operation of the WEF.**

## 7.3 DESIGN EVOLUTION ALTERNATIVES

Following the selection of a suitable site, consideration is given to the design of the WEF. It is important that wind turbines are sited in the optimum position to maximise the wind energy yield whilst minimising E&S impacts as far as possible.

Information collated during the scoping phase was used to inform the design of the preliminary WEF and associated infrastructure layout progressively. This approach was adopted with respect to this proposed development, and where potentially significant impacts were

identified, efforts were made to avoid these through evolving the design of the proposed development. Best practice advises that the EIA should be an iterative process rather than a post design environmental appraisal. In this way, the findings of the technical environmental studies were used to inform the design for EA of a development.

Various wind turbine designs and layouts were considered for the site in order to maximise the electricity generation capacity and efficiency, whilst taking into account environmental constraints.

During the scoping phase, 38 turbine locations, and two laydown and on-site substation alternative were provided to the specialists. This layout has been adjusted, based on the initial scoping assessment and specialists' findings. Due to the design evolution of the Khoe WEF turbine positions have been revisited. A design evolution summary report is presented in Appendix C of this EIA Report.

The layout of 29 turbines was presented and assessed in full detail during this EIA phase is considered the 'preferred layout' for Khoe WEF development.

## 7.4 BESS ALTERNATIVES

Unlike conventional energy storage facilities, such as pumped hydro, a BESS has the advantage of being flexible in terms of site location and sizing. Therefore, they can be incorporated into, and placed in close proximity, to a wind or solar facility. They also have the advantage of being easily scaled and designed to meet specific demands.

The function of the BESS will be to store peak kinetic energy produced by the proposed Khoe WEF for use in the following ways:

- To power the operation of the development when the national grid is strained by high (or peak) demand, often resulting in load-shedding.
- To provide excess generation to the national grid which will assist with stabilizing electricity supply during peaks and troughs of demand.
- To reduce the impact caused by the variability and limited predictability of wind generation.

The preferred battery technology being considered would be Solid-State, Lithium Ion (Li-Ion) batteries, which consists of multiple battery cells that are assembled together to form module. With rapid developments in battery technology globally, the EAP has undertaken a high-level desktop study of the BESS. The battery technology under consideration is explained further below, and compared in a table of advantages and disadvantages.

### 7.4.1 THE NEMA AND BESS

Although international BESS standards are currently being updated, current BESS regulations in South Africa are mostly written for backup power (uninterrupted power supply) applications.

Battery storage does not trigger any listed activities relating to the generation of electricity as technology does not 'generate' electricity, it simply stores electricity generated by a renewable energy facility (proposed Khoe WEF in this instance) and discharges the stored electricity as and when required by the grid. Furthermore:

- A battery is not deemed to be a container; and
- Electrolytes that are used within battery storage facilities: their function is deemed to be like transformers within substations: converting high voltage electricity to lower voltage

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electricity for further distribution. The function of the battery is not for “storage” or “storage and handling” of a dangerous good.

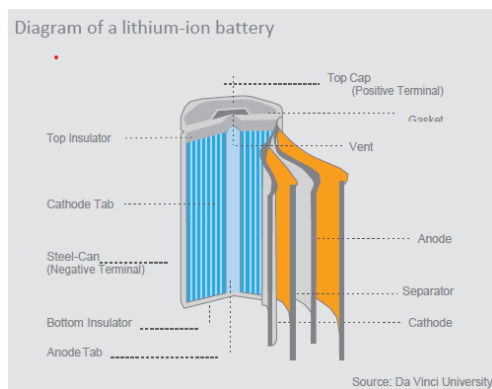
#### 7.4.2 BESS TECHNOLOGY CONSIDERED

Typically, a BESS consist of multiple battery cells that are assembled together to form modules. Each cell contains a positive electrode, a negative electrode and an electrolyte. A module may consist of thousands of cells working in conjunction. The preferred location of the BESS has been considered and assessed by the specialists, and the ancillary (or associated) infrastructure will include (but not limited to):

- a battery room;
- inverters;
- switch gear room; and
- Supervisory Control and Data Acquisition (SCADA) equipment.

Preferred Technology - Lithium ion (Li-ion) batteries are the most common stationary battery in the market today. Simply put, the batteries consist of a graphite electrode and a lithium-based electrode immersed in a liquid. When the battery is in use, charged lithium atoms ions flow from the graphite electrode to the lithium-based electrode through the liquid, and that flow of charged particles is what generates electricity. When the battery is recharged the flow is reversed, sending the lithium ions back to the graphite anode where they are stored ready for discharge.

FIGURE 7-1 DIAGRAM OF LITHIUM-ION BATTERY

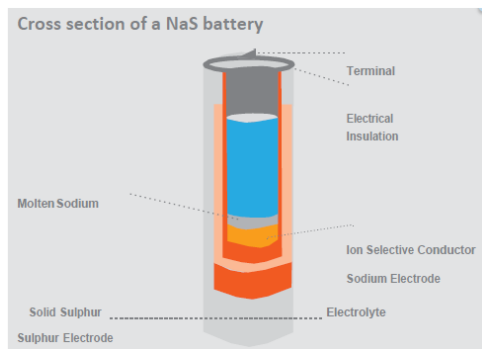


Solid State Battery is an acceptable solution to assist with reducing the fire risk Li-ion batteries pose. Unlike Li-Ion Batteries, Solid State Batteries have an ionic liquid made up of non-flammable molten salts with low melting points i.e. the electrolyte is considered a solid. Compared to Li-ion batteries with liquid electrolytes, SSBs offer an attractive option owing to their potential in improving safety and achieving both higher power and high energy densities. The trade-off with this type of battery is that electrically charged atoms do not move as freely and easily through a solid as they do through a liquid, so thus making them less efficient at generating electricity.

A sodium sulphur (NaS) battery is a molten state battery constructed from sodium (Na) and sulphur (S). The battery casing is the positive electrode while the molten core is the negative electrode. The battery operates at high temperatures of between 300-350 degrees Celsius (°C),

while lower temperature versions are under development. In charging, the sodium ions are transported through the ion selective conductor to the anode reservoir. Discharge is the reverse of this process. Since sodium ions move easily across the ion selective conductor, electrons cannot, therefore there is no self-discharge. When not in use the batteries are typically left under charge so that they will remain molten and be ready for use when needed. If shut down and allowed to solidify, a reheating process is initiated before the batteries can be used again.

FIGURE 7-2 DIAGRAM OF A SODIUM-SULPHUR BATTERY



Flow Batteries consist of two tanks of liquids that feed into electrochemical cells. The main difference between flow and conventional batteries is that flow batteries store the electricity in the liquid rather than in the electrodes. They're far more stable than Li-ion, they have longer lifespans, and the liquids are less flammable. Not only that, but a flow battery can be scaled up by simply building bigger tanks for the liquids. The most widely known and used flow battery is vanadium flow battery.

Table 7-1 describes the most widely used technologies available in the market, and the most feasible technology for large utilities projects. It must be noted that the technology is constantly changing and evolving and as such the Applicant would utilise the best possible technology available at the time of placement.

TABLE 7-1 THE TECHNOLOGY OPTIONS FOR THE BESS

Activity Alternative	Advantage	Disadvantage
<p><b>Preferred Technology: Li-Ion Batteries<sup>43</sup></b></p>	<ul style="list-style-type: none"> <li>Lithium ion has the smallest installation footprint when compared to the technologies for the similar energy capacity.</li> <li>Li-ion batteries are able to tolerate more discharge cycles than other technologies.</li> <li>High efficiency.</li> <li>Produce the highest voltage compared to other batteries by driving high electron flow.</li> </ul>	<ul style="list-style-type: none"> <li>Negative effects of overcharging / over discharging.</li> <li>Volatility leading to Fire and Explosions.</li> <li>Potential for issues associated with overheating (Certain Lithium chemistry's).</li> <li>The Lithium element in this technology is considered hazardous / dangerous goods.</li> <li>Lithium is a finite resource with concerns of its availability in the long term.</li> </ul>

<sup>43</sup>Li-Ion Battery: <https://ensia.com/features/battery-innovations-renewable-energy/>

Activity Alternative	Advantage	Disadvantage
Solid State Battery <sup>44</sup>	<ul style="list-style-type: none"> <li>• Potential to substitute Lithium for another electrode material.</li> <li>• Marked improvement in safety at cell and battery levels: solid electrolytes are non-flammable when heated, unlike their liquid counterparts.</li> <li>• It permits the use of innovative, high-voltage high-capacity materials, enabling denser, lighter batteries with better shelf-life as a result of reduced self-discharge.</li> <li>• Simplified mechanics as well as thermal and safety management.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced conductivity.</li> <li>• Sourcing of a suitable electrolyte.</li> <li>• Not as well researched and widely accepted as Li-Ion batteries.</li> <li>• Narrow temperature range and cannot tolerate varying temperature.</li> </ul>
NaS Batteries <sup>45</sup>	<ul style="list-style-type: none"> <li>• Long life cycle.</li> <li>• Able to tolerate a high number of charge/discharge cycles.</li> <li>• ability to discharge fully with no effects to the performance.</li> </ul>	<ul style="list-style-type: none"> <li>• Low energy to size ratio.</li> <li>• Heating may be required.</li> <li>• Potential safety issues with the molten sodium.</li> <li>• Has the potential to catch on fire.</li> </ul>
Flow Batteries <sup>46</sup>	<ul style="list-style-type: none"> <li>• More stable than Li-Ion battery.</li> <li>• Are known to have the longest lifespan.</li> <li>• Less flammable liquids.</li> <li>• Technology is scalable for large grid infrastructure and renewable energy project.</li> </ul>	<ul style="list-style-type: none"> <li>• The liquids can be costly, so there's a greater up-front cost for the batteries.</li> <li>• Not as efficient as Li-Ion Battery.</li> </ul>

## 7.5 TECHNOLOGY ALTERNATIVES

Alternative renewable energy technologies include hydro-electric power, photovoltaic solar or concentrated solar power. The site itself has no resource for hydro-electricity and a solar electricity generation would require a much greater infrastructure footprint and water consumption (for cleaning panels) to generate the equivalent energy of the proposed WEF. The question if wind energy technology is the best technology for the proposed location was answered as part of the Need and Desirability assessment (Section 5).

Wind energy presents less of an impact on the continued use of the land for grazing, as it does not result in the shading that occurs from solar facilities which affects vegetation and consequently farming practices. Whilst there are potential impacts associated with wind energy which are not associated with solar, such as collision risk with avifauna, there are different

<sup>44</sup> Solid State Battery: <https://www.greentechmedia.com/articles/read/us-storage-companies-quietly-grow-bets-on-solid-state-batteries>

<sup>45</sup> Li-Ion Battery and Na-S Battery: <https://ensia.com/features/battery-innovations-renewable-energy/>

<sup>46</sup> Flow Battery: <https://newatlas.com/energy/iron-aqds-flow-battery-usc/>

potential impacts for solar facilities such as loss of habitat and foraging areas for avifauna and other ecological receptors.

Based on the site's physical characteristics and existing land uses, the wind energy technology is best suited to the site.

## 8. THE PREFERRED ALTERNATIVE

The proposed Khoe WEF is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

The Khoe WEF project site is proposed to accommodate infrastructure (as detailed below), which will enable the WEF to supply a contracted capacity of up to 232 MW. The development footprint of the site will be up to 85 ha, dependent on the sensitivities in the area. The proposed development will comprise of the following infrastructure:

- Up to 29 wind turbines with a maximum tip height of up to 250 m and a rotor diameter of up to 200 m.
- Each turbine will have a capacity of up to 8 MW
- A transformer at the base of each turbine.
- Concrete turbine foundations approximately up to 1,000 m<sup>2</sup> per turbine
- Each turbine will have a hardstand area of approximately up to 7,500 m<sup>2</sup> per turbine
- Temporary laydown areas (with a footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area.
- BESS (with a footprint of up to approximately 5 ha).
- Cabling between the turbines, to be laid underground where practical.
- One on-site substations of up to 2.5 ha in extent to facilitate the connection between the WEF and the electricity grid.
- Access roads to the site and between project components inclusive of stormwater infrastructure. A 13.5 m road corridor may be temporarily impacted upon during construction and rehabilitated to 8m wide after construction.
- A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha).
- Operation and Maintenance (O&M) buildings (with a combined footprint of up to 1 ha) including a gate house, security building, control centre, offices, warehouses, a workshop and visitor's centre.

The project is expected to have a 20-25-year life span, but with possible refurbishment this could be extended if deemed feasible at the time.

### 8.1 WIND TURBINE GENERATORS AND HARDSTAND AREAS

The proposed Khoe WEF will comprise up to 29 turbines (each turbine with an approximate capacity of 8 MW) with a maximum output capacity of up to 232 MW with an anticipated lifespan of 20-25 years.

The turbines will be three-bladed horizontal-axis design with a WTG hub height from ground level is anticipated to be up to 150 m, with a blade length and rotor diameter of up to 100 m and 200 m respectively. The height of the complete structure is approximately up to 250 m. The exact turbine model has not yet been selected and will be identified based on the wind resource distribution, technical, commercial and site-specific considerations.



The proposed turbine development footprint and associated facility infrastructure will cover an area of up to 100 ha depending on the final design. The aerial extent of the total area is 7,900 ha.

Each turbine will require a transformer that will be located within the turbine tower. Each turbine will have a circular foundation which will be placed alongside the hardstand, resulting in that area being permanently disturbed by the turbine foundation. The dimensions of the turbines provided in this report are preliminary and will be finalized at a later stage of the Project.

The precise location of the turbines within the WEF site has been finalised and confirmed during the EIA process, following the assessment of technical and environmental constraints. Figure 8-1 to Figure 8-4 indicate a typical wind energy operation sequence as well as the different components of a wind turbine.

FIGURE 8-1 AN ILLUSTRATION OF TYPICAL COMPONENTS OF A WTG

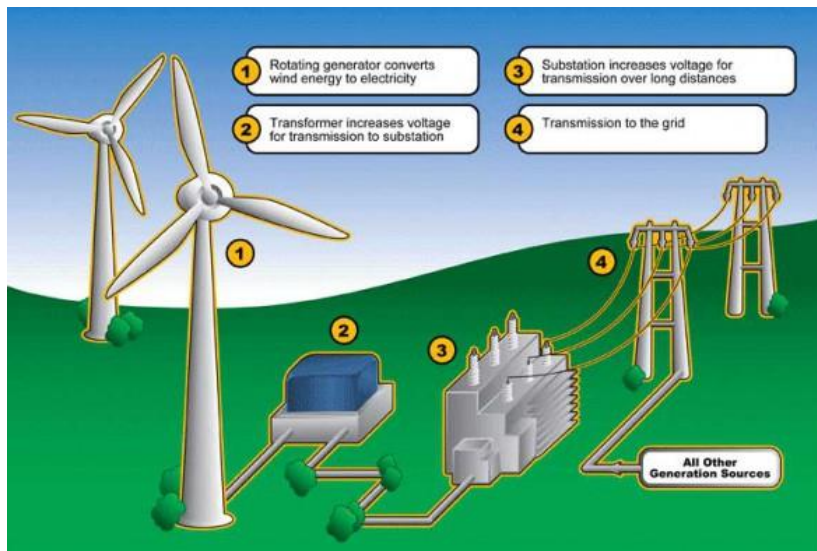


FIGURE 8-2 THE INSIDE OPERATION OF A TYPICAL WIND TURBINE

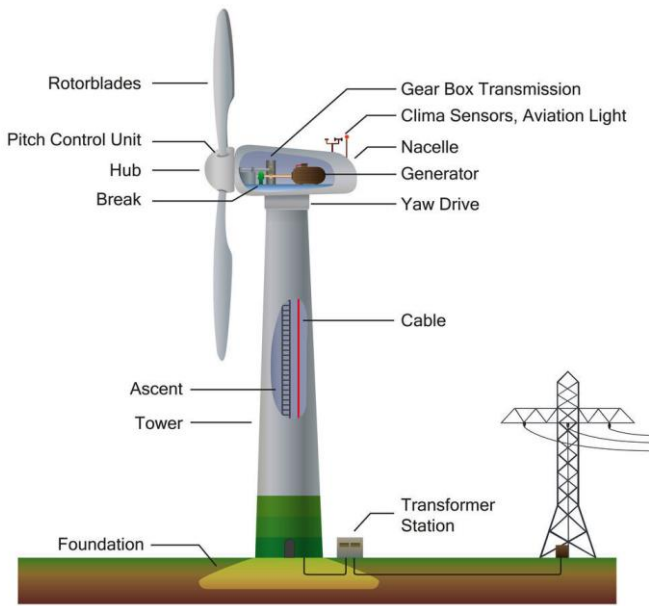


FIGURE 8-3 THE INSIDE OPERATION OF A TYPICAL WIND TURBINE

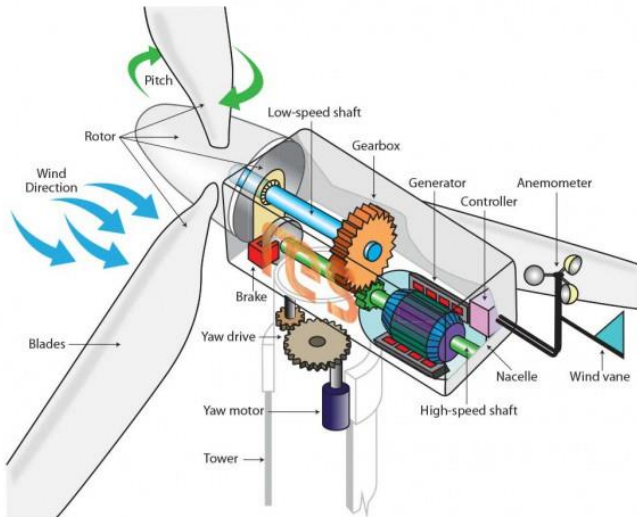


FIGURE 8-4 ILLUSTRATION OF A TYPICAL TURBINE HARDSTAND AND LAYDOWN AREA



## 8.2 ELECTRICAL CABLING AND ON-SITE SUBSTATION

It is proposed that an on-site substation with a capacity up to 132 kV with an up to 33 kV overhead / underground powerline will be installed. It is unknown at this stage how long the connection to the grid will be, or what route the cabling will be installed. Due to the complexity related to the routing of the transmission line, it will not form a part of this application. The intention is for the internal project cabling to follow the road network to the on-site facility substation.

The on-site substation is expected to have a footprint of 2.5 ha. It will be used to facilitate the connection to the national grid. The turbines will be connected to the on-site substation using an underground cabling network with a capacity of up to 33kV.

## 8.3 BATTERY ENERGY STORAGE SYSTEM

The BESS is expected to have a total footprint of approximately 5 ha. The function of the BESS will be to store peak kinetic energy produced by the Khoe WEF for use in the following ways:

- To power the operation of the proposed development when the national grid is strained by high (or peak) demand, often resulting in load-shedding.
- To provide excess generation to the national grid which will assist with stabilizing electricity supply during peaks and troughs of demand.
- To reduce the impact caused by the variability and limited predictability of wind generation.

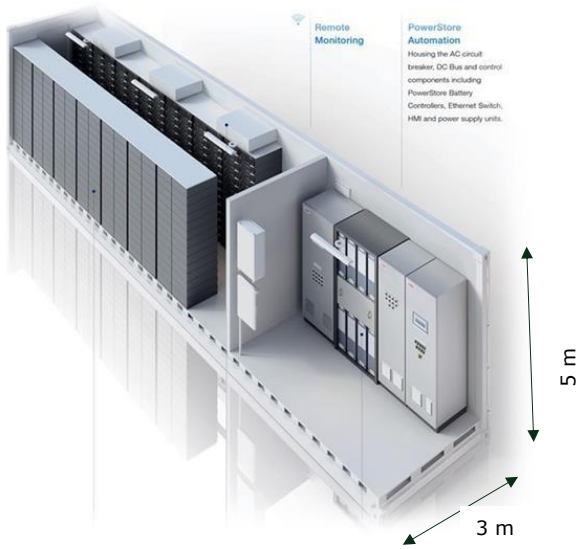
The preferred battery technology being considered would be Solid-State, Lithium Ion (Li-Ion) batteries, which consists of multiple battery cells that are assembled to form module. Each cell contains a positive electrode, a negative electrode and an electrolyte. A module may consist of thousands of cells working in conjunction. Modules are normally packaged inside containers (like shipping containers) and these containers are delivered pre-assembled to the project site.

The containers will have approximate dimension ranges of: height 5 m, width 3 m, length 20 m. The containers are raised slightly off the ground and are banded to prevent possible environmental damage resulting from any equipment malfunction. The proposed development is considering the option of stacking these containers vertically to a maximum of two container layers or a height of up to 10 m.

The BESS storage capacity has not been finalized at this point. The BESS will be placed on a concrete footprint of up to 5 ha. The BESS will be near the on-site substation, will be fenced off and will be linked to the substation via internal cables and will not have any additional office / operation / maintenance infrastructure as those of the substation.

The following figures are examples of BESS in other facilities for ease of reference. This proposed development will have similar project components and will be designed in a similar manner.

**FIGURE 8-5 TYPICAL REPRESENTATION OF HOW BATTERIES AND BATTERY MODULES ARE HOUSED AND ASSEMBLED**



**FIGURE 8-6 SOLARCITY'S TESLA BATTERY STORAGE FACILITY, HAWAII**



**FIGURE 8-7 A STOCK IMAGE OF A SIMILAR DEVELOPMENT WITH AN ON-SITE SUBSTATION AND BESS**



#### 8.4 LAYDOWN AREAS AND SITE OFFICES

Individual turbine temporary laydown areas including crane boom laydown areas, blade laydown areas and other potential temporary areas will be up to a maximum of 6 ha. The temporary warehouse and site camp establishment, as well as the concrete batching plants will have a footprint of up to 2 ha. As such, the footprint of the construction laydown area will be up to 8 ha in aerial extent.

#### 8.5 INTERNAL SITE ACCESS ROADS

Permanent roads will be up to 4.5 m wide, with a servitude of up to 13.5 m, which includes additional space required for cut and fill, side drains and other stormwater control measures. Furthermore, the servitude will be used as 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 on-site substation hub (which includes substation infrastructure, BESS and Balance of Plant area). All roads may have underground cables running next to them. The 13.5 m wide road servitude will be temporarily impacted during construction and rehabilitated to 4.5 m wide after construction.



## 8.6 SERVICE PROVISION

### 8.6.1 HEALTH AND SAFETY

The IFC guidelines for Health and Safety are based on the Occupational Health and Safety Act (OHSA) of America and are subsequently aligned with South African legislation (OHS Act no 85 of 1993). It is understood that the project infrastructure and equipment will be designed to good industry standards to minimise risks personnel working at the proposed development site.

FE Hugo & Khoe (Pty) Ltd will institute a Health and Safety (H&S) Plan prior to construction, for all persons working at the proposed development site. The policy will need to evaluate the risks and impacts to the health and safety of the affected community during the design, construction and operation of the proposed development, and establish preventive measures to address them in a manner commensurate with the identified risks and impacts within this assessment. Such measures need to adhere to the precautionary principle for the prevention or avoidance of risks and impacts over minimization and reduction.

### 8.6.2 WATER REQUIREMENTS

Water will be sourced from either the Local Municipality, supplied from a contractor and trucked in, from existing boreholes located within the application site or from a new licensed borehole (if feasible) if none of these options are available. Note, however, that should municipal water supply not be confirmed, the Applicant will investigate other water sources considering any necessary and relevant legal requirements.

High water use is only anticipated during the first twelve months of the construction phase mainly for purposes of the turbine foundations, roads and dust suppression. Thereafter the water usage will decrease drastically. The anticipated water usage for the proposed development for the duration of the construction phase includes the following:

- Drinking;
- Ablution facilities;
- Access Road construction;
- Dust suppression;
- Fire-fighting reserve;
- Cleaning of facilities; and
- Construction of foundations for the WEF infrastructure, i.e., turbines and substation, etc.

The water use requirement during the operational phase will be primarily for human consumption and sanitation purposes.

### 8.6.3 STORMWATER MANAGEMENT

Stormwater drainage systems will be constructed and kept separate from the sewerage effluent system on site to ensure that stormwater run-off from site is appropriately managed. Water from these systems is not likely to contain any chemicals or hazardous substances and will be released into the surrounding environment based on the natural drainage contours.

Wastewater and sludge will be managed by local authorities and service providers. All wastewater will be handled in accordance with the Guidelines for the Utilisation and Disposal of Wastewater Sludge Volumes 1 to 6 (Herselmann & Snyman, 2006).

A project specific stormwater management plan will need to be produced and appended to the EMPr (Appendix B) for implementation.

#### 8.6.4 WASTE MANAGEMENT

During the construction phase, it is estimated that the Khoe WEF would generate solid waste which includes (but is not limited to) packaging material, building rubble, discarded bricks, wood, concrete, plant debris and domestic waste. Solid waste will be collected and temporarily stockpiled within designated areas on site during construction, and thereafter removed and disposed of at a nearby registered waste disposal facility on a regular basis as per agreement with the local municipality. Where possible, recycling and re-use of materials will be encouraged.

During the operational phase, the WEF will typically produce minor quantities of general non-hazardous waste mainly resulting from the O&M and office areas. General waste will be collected and temporarily stockpiled in skips in a designated area on site and thereafter removed and disposed of at a nearby registered waste disposal facility (or registered landfill) on a regular basis as per agreement with the local municipality. Where possible, recycling and re-use of materials will be encouraged.

The development of the wind energy facility will include the construction and operation of facilities and infrastructure for the storage and handling of dangerous goods (combustible and flammable liquids, such as oils, lubricants, solvents associated with the facility, and facility substation) where such storage will occur inside containers with a combined capacity exceeding 80 cubic meters but not exceeding 500 cubic meters.

Any hazardous waste such as chemicals or contaminated soil as a result of spillages, which may be generated during the construction and operational phases, will be temporarily stockpiled within a designated area on site and thereafter removed off site by a suitable service provider for safe disposal at a registered hazardous waste disposal facility.

It must be noted that waste handling is not yet confirmed and is to be confirmed at a later stage through municipal or private channels. Similarly, the volumes of waste to be generated during construction and operation phases cannot be confirmed at this stage. This being said, the Project will adopt the 4R principle for solid waste management, which includes (in order of priority) to:

- Refuse single use plastics as much as possible;
- Reduce the use of non-recyclable products;
- Reuse solid wastes where possible to convert it into other useful products; and
- Recycle all wastes where possible.

#### 8.6.5 SEWAGE

The Wind Energy Facility will require sewage services during the construction and operational phases. Low volumes of sewage or liquid effluent are estimated during both phases. Liquid effluent will be limited to the ablution facilities during the construction and operational phases. Portable sanitation facilities (i.e. Chemical toilets) will be used during the construction phase, which will be regularly serviced and emptied by a registered contractor on a regular basis.

The Applicant may consider a conservancy tank or Maskam fusion system, which will be employed on site during the operational phase for which a registered company will be

contracted to store and transport sewage from site to an appropriate municipal wastewater treatment facility.

### 8.6.6 ELECTRICITY

Electricity on site will be from on-site diesel generators, as well as sourced from the national grid distribution networks.

### 8.7 EMPLOYMENT

In addition to the workforce required during the construction phase (which is anticipated to be approximately 200 to 250 staff), the Project is anticipated to require an additional ~20 staff during the operational phase of the Project.

### 8.8 SUMMARY OF PROJECT INFORMATION

#### WEF Technical Details

WEF Components	Technical Details	Description/Dimensions - Khoe
Maximum Generation Capacity		up to 232 MW
Turbine Capacity		Up to 8 MW
Type of technology		Onshore Wind
Number of Turbines		Up to 29
WTG Hub Height from ground level		up to 150 m
Blade Length		up to 100 m
Rotor Diameter		up to 200 m
Structure height (Tip Height)		up to 250 m
Structure orientation		Wind regiment dependent
<b>Area occupied by both permanent and construction laydown areas</b>		<ul style="list-style-type: none"> <li>• Concrete turbine foundations - approximately up to 1000m<sup>2</sup> per turbine</li> <li>• Each turbine will have a hardstand area of approximately up to 7500m<sup>2</sup> per turbine</li> <li>• Temporary laydown areas (with a combined footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area;</li> <li>• A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha)</li> </ul>
Operations and maintenance buildings (O&M building) with parking area		up to 1 HA
Site Access		Via the R318
Area occupied by inverter transformer stations/substations		up to 2.5 HA



<b>WEF Technical Components</b>	<b>Details</b>	<b>Description/Dimensions - Khoe</b>
Capacity of on-site substation		132/33kv
Battery Energy Storage System footprint		up to 5 HA
BESS type		Lithium-ion technology
BESS Alternatives (site, technology, design and layout)		Same as above. See layout for design and position
Width of internal roads		Access roads to the site and between project components with a width of approximately 4.5 m and a servitude of 13.5 m.
Proximity to grid connection		This has not been determined at this stage of the Project.
Internal Cabling		Cabling between the turbines, to be laid underground where practical.
Height of fencing		Up to 3 metres

## 9. PUBLIC PARTICIPATION PROCESS

### 9.1 INITIAL PROCESS

The first stage of public consultation was undertaken during the initial notification phase prior to the completion and public review of the Draft Scoping Report. On the 14 December 2023, advertisements were placed in one provincial newspaper (The Daily Voice) and one local newspaper (Standard Breederivier Gazzette); site notices were erected on the site; and written notices were sent out to the affected landowners, surrounding landowners and occupiers of the site, as well as to key stakeholders and organ of state. The objective of this phase was to inform the National, Provincial and Local Government Authorities, relevant public, private sector entities, NGOs and local communities about the project and capture their initial views and issues of concern that is important for the formulation of a plan of study and to allow the public to register as I&APs.

Following the initial phase, notification letters were sent to all I&APs informing them of the availability of the draft scoping report for public review and comment, which took place for a period of 30-days from the Thursday, 29 February 2024 to Tuesday, 02 April 2024 (both days inclusive).

All issues raised during the initial notification and scoping phase has been taken into consideration and included in the EIA report. Volume II contains the Comments and Response Report which addresses all Interested and Affected Parties (I&APs) comments received to date

The primary aims of the public participation process (PPP) are:

- To inform I&APs of the proposed development;
- To identify issues, comments and concerns as raised by I&APs;
- To promote transparency and an understanding of the project and its potential consequences;
- To assist in identifying potential environmental (biophysical and socio-economic) impacts associated with the proposed development; and
- To ensure that all I&AP issues and comments are accurately recorded, addressed and documented in the comments and responses report.

### 9.2 EIA PHASE PUBLIC PARTICIPATION

During the EIA phase the following tasks will be undertaken for public participation:

- Notification letters to be sent out to registered I&APs, key stakeholders, and organs of state to inform them of the availability of the Draft Environmental Impact Assessment Report (DEIAR) for review and comment (30 days);
- The Comments and Reponses Report will be updated, recording comments and/or queries received and the responses provided; and
- Notification letters to all registered I&APs, key stakeholders, and organs of state to inform them of the decision by the DFFE and the appeal procedure.

Furthermore, I&APs will also be able to register on the I&AP database throughout the duration of the EIA process and registered I&APs will be informed about the progress of the application.

The public participation in the EIA phase has the following objectives:

- Inform I&APs about the EIA process followed to date;
- Present the specialist studies undertaken, impacts and proposed mitigation measures;
- Present the results of the Environmental Impact Assessment; and
- Collect concerns and expectations and take them into consideration in the EIA.

Details of the above information is attached in a public participation report (Volume III).

## 9.3 SUMMARY OF COMMENTS

### 9.3.1 INITIAL SCOPING PHASE

During the initial notification phase, no comments / queries / questions / concerns were received from I&APs.

### 9.3.2 SCOPING PHASE

During the scoping phase comment was received from the DFFE, other authority and I&APs. Responses to comments received are provided in Section 6 of the PP Report (Volume III), with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report (Appendix F).

## 10. ASSESSMENT OF POTENTIAL IMPACTS

This section evaluates the impacts associated with the construction, operational, decommissioning and cumulative phases of the WEF

### 10.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

It should be noted that an Agricultural Compliance Statement is not required to formally rate agricultural impacts by way of impact assessment tables.

An agricultural impact is a change to the future agricultural production potential of land. In most developments, including the one being assessed here, this is primarily caused by the exclusion of agriculture from the footprint of the development. Soil erosion and degradation may also contribute to loss of agricultural production potential. The significance of an agricultural impact is a direct function of the following three factors:

- the size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased);
- the baseline production potential (particularly cropping potential) of that land; and
- the length of time for which agriculture will be excluded (or for which potential will be decreased).

In the case of wind farms, the first factor, size of footprint, is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has, and regardless of the duration of the impact. This is because the required spacing between turbines means that the amount of land excluded from agricultural use is extremely small in relation to the surface area over which a wind farm is distributed. Wind farm infrastructure (including all associated infrastructure and roads) typically occupies less than 2% of the surface area, according to the typical surface area requirements of wind farms in South Africa (DEA, 2015). Most wind energy facilities, for which I have recently done assessments, occupy less than 1% of the surface area. All agricultural activities can continue unaffectedly on all parts of the farmland other than this small footprint, from which agriculture is excluded, and the actual loss of production potential is therefore insignificant.

A study done to measure the impact of existing wind farms on agricultural production potential (Lanz, 2018) is highly informative of the extent of the agricultural impact that is likely for this proposed development. Although the study was done in a different agricultural environment, it is similar in terms of being a site that includes croplands. There is no reason that the results obtained in that study would not be applicable to the area in this assessment. The overall conclusion of the study was that, although wind farms have been established within an area of cultivated farmland, it is highly unlikely that this has caused a reduction in agricultural production. Tiny amounts of cropland have been lost, but the consequence of this for agricultural production has been negligible. It is likely that the positive financial impacts of wind farming have outweighed the negative impacts, and that wind farming has benefited agriculture and agricultural production in the area.

As identified in the study, it is important to note that wind farms have both positive and negative effects on the production potential of land. It is the net sum of these positive and

negative effects that determines the extent of the change in future production potential. The positive effects are:

- increased financial security for farming operations - Reliable and predictable income will be generated by the farming enterprises through the lease of land to the energy facility. This will increase financial security and could improve farming operations and productivity through increased investment into farming; and
- improved security against stock theft and other crime due to the presence of security infrastructure and security personnel at the energy facility.

There are two additional effects, but because they are highly unlikely to influence agricultural production, they are not considered further. They are:

- Prevention of crop spraying by aircraft over land occupied by turbines – ground based or using drones for spraying are effective, alternative methods that can be used without implications for production or profitability; and
- Interference with farming operations - Construction (and decommissioning) activities are likely to have some nuisance impact for farming operations but are highly unlikely to have an impact on agricultural production.

The loss of agricultural potential by soil degradation can effectively be prevented for renewable energy developments by generic mitigation measures that are all inherent in the project engineering and/or are standard, best-practice for construction sites. Soil degradation does not therefore pose a significant impact risk.

Due to the facts that the energy facility will exclude only an insignificantly small area of agricultural production from the land and that its negative impact is offset by economic benefits to farming, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable.

The agricultural protocol requires an indication of the potential losses in production and employment from the change of the agricultural use of the land as a result of the proposed development. As this assessment has shown, the agricultural use of the land will be integrated with the renewable energy facility, and it will continue with no discernible change in terms of production. The expected losses in production and employment will therefore be zero.

### 10.1.1 MITIGATION MEASURES

Generic mitigation measures that are effective in preventing soil degradation are all inherent in the engineering of such a project and/or are standard, best-practice for construction sites.

- A system of storm water management, which will prevent erosion on and downstream of the site, will be an inherent part of the engineering design on site. Any occurrences of erosion must be attended to immediately and the integrity of the erosion control system at that point must be amended to prevent further erosion from occurring there. As part of the system, the integrity of the existing contour bank systems of erosion control on croplands, where they occur on steeper slopes, must be kept intact.
- Any excavations done during the construction phase, in areas that will be re-vegetated at the end of the construction phase, must separate the upper 25 cm of topsoil from the rest of the excavation spoils and store it in a separate stockpile. When the excavation is back-filled, the topsoil must be back-filled last, so that it is at the surface. Topsoil should only be

stripped in areas that are excavated. Across most of the site, including construction lay down areas, it will be much more effective for rehabilitation, to retain the topsoil in place. If levelling requires significant cutting, topsoil should be temporarily stockpiled and then re-spread after cutting, so that there is a covering of topsoil over the entire cut surface. Furthermore, there are no areas to be avoided in terms of agricultural impacts and no buffers are applicable.

### 10.2 FRESHWATER AND WETLANDS (AQUATICS)

It was determined that the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. This assumes that the mitigations listed below are considered coupled to the fact that the overall layouts have avoided any of the High / No-Go areas, unless making use of areas with impacts such as existing farm roads which has taken place, however it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

The loss of irreplaceable aquatic habitat and/or important aquatic obligate biota is therefore highly unlikely. The impacts are easily mitigated (provided the mitigation measures and monitoring plan within the EMP and this report are implemented and adhered to during all phases of the project).

The following potential impacts were assessed with regard aquatic environment that would be affected by the proposed development:

- Impact 1: Loss of habitat containing protected species or Species of Special Concern and / or habitats that could contain species listed as Critically Endangered, Endangered or Vulnerable
- Impact 2: Loss of any critical ecological corridors and the connectivity of habitats which are linked to future conservation plans or protected areas expansion and NFEPA's, associated within any riverine or wetland systems.
- Impact 3: Potential spread of alien vegetation
- Impact 4: Loss of riparian habitat
- Impact 5: Changes to the hydrological regime and increased potential for erosion
- Impact 6: Changes to water quality

#### 10.2.1 CONSTRUCTION, OPERATIONAL AND DECOMMISSIONING PHASE

##### Impact Phase: Construction and Decommissioning

**Nature of the impact:** Loss of vegetation and in particular species / habitats that could contain listed as Critically Endangered and or Vulnerable species (direct)

**Description of Impact:** Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity. However no aquatic vegetation or fauna with conservation concern were observed during this assessment, coupled to the fact that any sensitive areas will be avoided.

Impact Status: Negative

Extent	Duration	Reversibility	Magnitude	Probability
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<b>Impact Phase: Construction and Decommissioning</b>					
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout prior to construction.
- Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.
- Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).

To minimise the impact of the access roads:

- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop because of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal

### Impact Phase: Construction and Decommissioning

of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

#### Impact Phase: Construction and Decommissioning

**Nature of the impact:** Loss of any critical corridors and connect habitats that are linked to any future conservation plans or protected areas expansion (direct) is not expected as these have been avoided, coupled to the fact that hydrological connections will be retained through avoidance or the inclusion of ecological buffers.

**Description of Impact:** Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

- Mitigation measures to reduce residual risk or enhance opportunities:
- The aquatic systems have been mapped to a finer scale and have taken cognizance of any potential CBAs. As High / No-Go have been avoided by the major infrastructure such as turbines and buildings, the aquatic zones associated within the CBA / ESAs have also been avoided. Roads will need to traverse these areas, thus it is important to try and select existing areas with impacts / crossings where possible
- The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout prior to construction. Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).  
To minimise the impact of the access roads:



**Impact Phase: Construction and Decommissioning**

- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.
- It is the contractor’s responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures
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**Impact Phase: Construction and Operation**

Nature of the impact: Any physical disturbance could result in the spread of alien vegetation (direct)

Description of Impact: During construction, complete clearing of the roads and turbine areas, as well as any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	

**Impact Phase: Construction and Operation**

**S=(E+D+R+M)\*P**    Moderate Negative Impact (39)    Low Negative Impact (14)

Was public comment received?	No
Has public comment been included in mitigation measures?	No

Mitigation measures to reduce residual risk or enhance opportunities:

- Alien vegetation management must be initiated at the beginning of the construction period and must extend into any remaining areas into the operation phase on the facility
- The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications

Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan

Residual impact	Very low and acceptable, with adoption of mitigation measures and monitoring
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**Impact Phase: Construction and Decommissioning**

**Nature of the impact:** It was recommended that all wetlands / riverine systems as well as the inclusive of buffers, be avoided. This was then taken forward in the design process.

**Description of Impact:** During construction, complete clearing of the roads and turbine areas, as well as any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, all Very High Sensitivity / No-Go areas have been avoided by the proposed layout by also making use of existing road crossings or considering any of the proposed buffers.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in	No				

### Impact Phase: Construction and Decommissioning

mitigation measures?

Mitigation measures to reduce residual risk or enhance opportunities:

- The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout prior to construction.
- Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.
- Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).
- To minimise the impact of the access roads:
- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures
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### Impact Phase: Construction and Decommissioning

**Nature of the impact:** Increased hard surfaces can result in increases in runoff generated by the site, thereby resulting in changes to localised hydrological regimes.

**Description of Impact:** During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas have all been avoided by the proposed layout by also making use of existing road crossings or by considering any of the proposed buffers.

Impact Status: Negative

<b>Impact Phase: Construction and Decommissioning</b>					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- No stormwater discharged may be directed to delineated aquatic zones or the associated buffers.
- A stormwater management plan finalised prior to construction, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas
- To minimise the impact of the access roads:
  - Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
  - Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas.. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.

**Impact Phase: Construction and Decommissioning**

- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.
- It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures
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**Impact Phase: Construction and Decommissioning**

Nature of the impact: Potential impact on localised surface water quality (indirect)

Description of Impact: During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- All liquid chemicals including fuels and oil, including for the BESS, must be stored in with secondary containment (bunds or containers or berms) that can contain a leak or spill. Such facilities must be inspected routinely and must have the suitable PPE and spill kits needed to contain likely worst-case scenario leak or spill in that facility, safely.
- Washing and cleaning of equipment must be done in designated wash bays, where rinse water is contained in evaporation/sedimentation ponds (to capture oils, grease cement and sediment).
- Mechanical plant and bowsers must not be refueled or serviced within 100m of a river channel or wetland.

**Impact Phase: Construction and Decommissioning**

- All construction camps, lay down areas, wash bays, batching plants or areas and any stores should be beyond any demarcated water courses and their respective buffers.
- Littering and contamination associated with construction activity must be avoided through effective construction camp management.
- No stockpiling should take place within or near a water course.
- All stockpiles must be protected and located in flat areas where run-off will be minimised and sediment recoverable.

ECO monitors the site on a daily basis to ensure plant is in working order (minimise leaks), spills are prevented and if they do occur, are quickly rectified.

Residual impact	Low risk and acceptable, with adoption of mitigation measures and monitoring
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**10.3 TERRESTRIAL BIODIVERSITY**

**10.3.1 CONSTRUCTION AND DECOMMISSION PHASES**

The impacts that will be most prevalent during the Construction Phase of the proposed Khoe WEF are:

- Vegetation Clearing
- Chemical Contamination
- Reduced Connectivity and Restricted Movement
- Altered Flow Regimes
- Enhancement of Overgrazing
- Disturbance and/or Displacement
- Mortality

The anticipated impacts during the Decommissioning Phase of the proposed Khoe WEF mirror those expected during the construction phase. Decommissioning activities are foreseen to take a similar amount of time as construction activities. However, they primarily involve dismantling the structures that were previously erected for the development. The impacts that will be most prevalent during the Decommission Phase of the proposed Khoe WEF are:

- Vegetation Clearing
- Reduced Connectivity and Restricted Movement
- Disturbance and/or Displacement
- Mortality

**Impact Phase: Construction/ Decommissioning**

Nature of the impact: Potential vegetation clearing impacts associated with the construction and decommissioning phase of the proposed development

Description of Impact: Certain areas will need to be cleared of vegetation to facilitate construction of associated infrastructure and transport of personnel on site. This impact will negatively affect endemic, threatened or important flora species.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
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**Impact Phase: Construction/ Decommissioning**

<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (44)		Low Negative Impact (24)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The development footprint must avoid No-Go/ High Sensitivity areas as much as possible.
- Limit the area of impact as much as possible.
- A pre-construction walkthrough during the optimal flowering period (spring) of the finalized development layout must be conducted to ensure that No-Go and High Sensitivity areas are avoided where possible.
- Ensure that lay-down and other temporary infrastructure are within Low Sensitivity areas.
- Rehabilitate disturbed areas that are not required by the operational phase of the development.
- All construction staff on site must attend an environmental induction to ensure that basic environmental principles are adhered to. This includes topics such as avoiding fire hazards, no littering, appropriate handling of pollution and chemical spills, minimizing wildlife interactions, remaining within demarcated construction areas, avoidance of No-Go areas and sensitive habitats etc.
- Demarcate sensitive areas near the development footprint as no-go areas with construction tape or similar and clearly marked as No-Go areas.
- An EMPr must be implemented and must provide a detailed description of how construction activities must be conducted to reduce unnecessary clearing and/or destruction of habitat.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in soil erosion and alien invasive species establishing themselves before natural flora can. All mitigation measures would need to be adhered to and continuous monitoring and maintenance is required after construction.
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**Impact Phase: Construction**

Nature of the impact: Potential chemical contamination impacts associated with the construction phase of the proposed development.

Description of Impact: Chemical contamination during the Construction phase. Spillage of construction materials or chemicals can adversely impact waterbodies and the fauna and flora on which they depend.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable

**Impact Phase: Construction**

<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The development footprint must avoid High Sensitivity areas as much as possible.
- Ensure proper storage and handling of chemicals (fuel, lubricants, cleaning agents) used on-site. Store all chemicals in designated areas equipped with spill containment measures to prevent leaks and spills.
- A chemical spill response plan must be developed before construction activities are undertaken. This spill response plan must be implemented by an ECO on site.
- Provide appropriate training to construction staff on the safe handling of chemical and hazardous materials.
- Implement measures to prevent runoff to nearby waterbodies by installing sediment traps and/or containment pods. This should be addressed in the Stormwater Assessment.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in aquatic systems on site as well as soil cover. The use of chemicals on site should be limited as far as possible and environmentally friendly alternatives should be utilized, resulting in no major residual impacts associated with the phase.
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**Impact Phase: Construction/ Decommissioning**

**Nature of the impact:** Reduced connectivity and restricted movement of fauna impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Construction and Decommissioning activities and novel infrastructure (e.g., perimeter fencing) may exclude species from portions of suitable habitat by restricting animals' movement across the landscape.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		



**Impact Phase: Construction/ Decommissioning**

**S=(E+D+R+M)\*P**      Moderate Negative Impact (44)      Low Negative Impact (24)

Was public comment received?	No
Has public comment been included in mitigation measures?	No

Mitigation measures to reduce residual risk or enhance opportunities:

- Minimization of length and width of road network.
- Fencing and road designs to allow for passage of animals (e.g., short, wide culverts in roads and wildlife friendly fencing).
- Implement habitat enhancement and restoration measures to offset the loss of connectivity caused by construction and decommissioning activities. This can be achieved by planting native vegetation, installing nesting boxes, or creating artificial shelters to provide alternative habitats for displaced fauna species and enhance connectivity within the landscape. This should be considered in the EMPr.
- All recommendations in the Terrestrial Animal Specialist Assessment must be adhered to.

Residual impact	Residual impacts are expected to occur for the area specifically for wildlife. Change in wildlife behaviour as a response to activities associated with the WEF is expected and should be continuously monitored.
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**Impact Phase: Construction**

**Nature of the impact:** Potential altered flow regime impacts associated with the construction phase of the proposed development.

**Description of Impact:** Construction of infrastructure may alter water flow characteristics such as runoff, sedimentation and infiltration. These could change vegetation community composition, soil depth, and habitat suitability over time.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

**Impact Phase: Construction**

- Adequate flow and erosion control measures should be included in the EMPr.
- Ongoing monitoring and rehabilitation of disturbed areas must be implemented.
- All recommendations in the Stormwater Assessment must be strictly adhered to.

Residual impact	Vegetation clearing may impact runoff and infiltration rates. As a result, residual impacts may occur after mitigation measures have been applied, but these impacts are manageable.
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**Impact Phase: Construction/ Decommissioning**

**Nature of the impact:** Potential disturbance and/or displacement impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Increased activity, movement of machinery and operation of equipment may disturb and/or displace certain animal SCCs from the vicinity of construction and decommissioning

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	3	3	3	4	4
<b>With Mitigation</b>	Local	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	2	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Temporary laydown areas, construction yards and site office buildings to be placed in low sensitivity or modified areas.
- Pre-construction baseline animal monitoring programme must be implemented, with focus on areas identified for the construction footprint during the design phase (e.g., road network).
- Avoidance of highly sensitive habitats for construction areas.
- Clearly demarcated construction areas and no unauthorized personnel to be permitted beyond demarcated areas.
- Adequate noise reduction measures (where possible) on heavy machinery.
- Minimize construction activity that occurs between dusk and dawn when animals are most active.
- Minimization of lighting used to illuminate construction areas and site buildings.

Residual impact	Residual impacts include displaced SCC as a result of activities associated with the WEF.
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**Impact Phase: Construction/Decommissioning**

**Nature of the impact:** Potential mortality of faunal and flora species due to direct and indirect impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Direct mortality due to increased traffic and illegal collection/poaching/entrapment, and indirect mortality due to potential increased predator presence and decreased detection can occur during the Construction/Decommissioning Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	Very High	Highly Probably
<b>Score</b>	2	4	5	5	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	<b>High Negative Impact (64)</b>		<b>Low Negative Impact (30)</b>		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- No movement of vehicles and personnel between dusk and dawn.
- Implementation and enforcement of speed limits.
- Roadkill monitoring and recording programme.
- Induction toolbox talks to personnel to increase awareness about animal SCCs present and roadkill risks.
- No unauthorized movement of personnel.
- No unauthorized access to the construction site.
- No trenches to be left uncovered overnight.
- Trenches, excavations and cattle grids to have slopes to allow for animals to escape should they fall in.
- No hunting permitted.
- No dogs or cats permitted (other than those of the landowner).
- Waste management programme to prevent trash buildup attracting species such as crows.
- Roadkill to be immediately reported, removed and suitably disposed of to prevent scavenging (e.g., buried).
- Construction activity to be minimized during the night to reduce noise pollution during periods when Riverine Rabbit are most active.

Residual impact	Residual impacts include direct mortality of species of conservation concern as a result of activities associated with the WEF.
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### 10.3.2 OPERATION PHASE

The anticipated impacts for the operational phase of the proposed development are:

- Habitat Fragmentation
- Potential Encroachment of Alien Invasive Species

- Light, Noise and Visual Pollution
- Faunal Mortality and Loss of SCC
- Soil erosion
- Unwanted Fires

Their significance with and without the recommended mitigation measures are assessed in the tables below.

### Impact Phase: Operation

**Nature of the impact:** Potential habitat fragmentation impacts associated with the operational phase of the proposed development.

**Description of Impact:** Habitat fragmentation due to the presence of wind turbines and associated infrastructure is anticipated for the operational phase. Fragmented habitats may cause ecological barriers and restricted gene flow, indirectly affecting faunal and flora species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probably
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The EMPr should include biodiversity monitoring and an adaptive management plan for the operational phase to ensure there are no adverse impacts observed to the fauna community.
- Biodiversity monitoring must be implemented for various specialisms to assess the ongoing impacts of the operational wind farm compared to pre-construction baseline data. Specialists would need to be contracted by the Functional Entity and monitoring must come into effect in direct alignment with various specialist Guidelines and Best Practice.
- Implement habitat enhancement and restoration measures to offset the loss of connectivity caused by operational activities. This can be achieved by planting native vegetation, installing nesting boxes, or creating artificial shelters to provide alternative habitats for displaced fauna species and enhance connectivity within the landscape. This should be considered in the EMPr.
- All recommendations in the Terrestrial Animal Specialist Assessment must be adhered to.

Residual impact	Residual impacts include displacement of species, potentially species of conservation concern, from the site.
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**Impact Phase: Operation**

**Nature of the impact:** Potential encroachment of alien invasive species resulting in loss of flora SCC associated with the operational phase of the proposed development.

**Description of Impact:** Movement of personnel, and increased disturbance puts the proposed development area at greater risk of alien invasive species moving into and spreading within the area. Alien invasive species will encroach into disturbed areas left behind by construction activities and may go undetected during the operational phase. This impact results in the potential loss of flora SCC or endemic species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Definite
<b>Score</b>	2	4	5	5	5
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	<b>High Negative Impact (80)</b>		<b>Low Negative Impact (20)</b>		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Disturbed areas such as road verges, lay-down areas and areas utilised by temporary construction facilities must be regularly monitored to detect the establishment of alien species and those species should be eradicated before they spread.
- Regular alien clearing should be conducted, as needed, using the best-practice methods for the species concerned, the use of herbicides should be avoided as far as possible.
- The use of herbicides (if absolutely required) for the control and eradication of alien grasses should be done in accordance with the alien eradication programme in the EMPr to reduce unintended ecological impacts.

Residual impact	Residual impacts include loss of natural flora and suitable habitat due to encroachment of alien invasive species.
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**Impact Phase: Operation**

**Nature of the impact:** Potential light, noise and visual pollution impacts associated with the operational phase of the proposed development.

**Description of Impact:** Wind farms have the potential to directly impact species through noise and vibration, light, and visual pollution. Visual disturbance caused by wind turbines and associated infrastructure can impact faunal species' sight and deter their navigation and mating cues. Artificial light present at night from operational turbines may attract insects and also attract bats posing a collision risk. The WEF's associated infrastructure will cause noise and vibrations throughout the site and adjacent areas. This may impact faunal species by affecting their behaviour and deter species from their natural habitat.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probably
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Use low-intensity and downward-facing lighting fixtures to reduce the attraction of insects and mitigate the risk of bat collisions.
- Employ noise mitigation measures, such as acoustic insulation, to reduce the transmission of noise from wind turbines and associated infrastructure.
- Develop and implement operational protocols to minimize noise and vibration disturbances during critical periods for faunal species, such as breeding, nesting, and foraging.
- Schedule maintenance activities and construction work during off-peak hours to minimize disruption to wildlife behavior and habitat use.

Residual impact	Residual impacts include potential collision risks of SCC by potentially attracting them into the rotor swept area. Other residual impacts include loss of species abundance and diversity from the area due to the WEF and associated activities.
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**Impact Phase: Operation**

**Nature of the impact:** Potential fire impacts associated with the operational phase of the proposed development.

**Description of Impact:** Increased personnel on site increases the fire risk due to smoking and/or use of electrical equipment on site.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- No open fires should be permitted outside of designated areas.
- Smoking areas must be defined, and no smoking should be permitted outside of designated areas.
- An emergency response plan for uncontrolled fires must be in place prior to operation and implemented for the duration of the WEF's lifespan.
- All staff members must have a Fire and Safety induction to increase awareness.

Residual impact	Residual impacts include loss of faunal SCC. This is why it is critical to manage unplanned fires as soon as possible to avoid mortality.
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**Impact Phase: Operational**

**Nature of the impact:** Direct mortality through collision, entrapment and illegal collecting or poaching of animals

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	4	4
<b>With Mitigation</b>	Local	Long term	Reversible	High	Low Probability
<b>Score</b>	2	4	1	4	2

**Impact Phase: Operational**

Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative (44)	Low Negative (22)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities:		
<ul style="list-style-type: none"> <li>• Strictly enforced speed limits;</li> <li>• Strictly controlled site access;</li> <li>• Minimized movement of personnel vehicles at night;</li> <li>• Wildlife friendly road crossings (including culverts that allow animal movement below the road surface);</li> <li>• Signage, education and awareness induction training about relevant animal SCCs to personnel;</li> <li>• Wildlife-friendly fencing and cattle grids.</li> </ul>		
Residual impact	None	

**Impact Phase: Operation**

**Nature of the impact:** Potential soil erosion impacts associated with the operational phase of the proposed development.

**Description of Impact:** Soil erosion facilitated by clearing vegetation and increased road use promotes soil displacement and loss during the Operational Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
Significance Calculation	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:



**Impact Phase: Operation**

- Utilize existing servitudes and access roads wherever possible, any new roads or the upgrading of roads should be minimized as far as possible and not be larger than required.
- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be allowed.
- Ensure that sufficient erosion control measures are constructed on all servitudes and access roads in the project area, including where such crosses waterbodies.
- Rehabilitate existing servitude and access roads in the project area with sufficient erosion control measures to prevent the loss of soil and the degradation of vegetation.
- Construction activities in or near drainage lines, washes or temporary inundated depressions must only take place during the dry season.
- An EMPr must be implemented and must provide a detailed description of how construction activities must be conducted to avoid increased erosion.
- Erosion management at the site should take place according to the Erosion Management Plan and Rehabilitation Plan included in the EMPr.
- All roads and other hardened surfaces should have runoff control features which redirect water flow and dissipate energy in the water stream which may pose an erosion risk.
- Regular monitoring for erosion after construction to ensure that no erosion problems have developed as result of the disturbance during the operation of the project.

Residual impact	Residual impacts include changes to infiltration rates and loss of soil fertility.
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**10.4 FAUNAL**

**10.4.1 CONSTRUCTION AND DECOMMISSIONING PHASES**

The following impacts are identified as the major impacts that are likely to be associated with the development of the Khoe WEF:

- Direct Habitat Loss
- Indirect Habitat Loss
- Disturbance/displacement
- Direct Mortality
- Indirect Mortality

**Impact Phase: Construction**

Nature of the impact: Direct habitat loss through vegetation clearing or fire during construction

Impact Status: Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	1	3	3	3	4
<b>With Mitigation</b>	Local	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		

**Impact Phase: Construction**

<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)	Moderate Positive (44)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	

Mitigation measures to reduce residual risk or enhance opportunities:

- The production of an appropriate rehabilitation and restoration plan with the aims of improving and monitoring habitat availability and connectivity, in consultation with specialists and relevant stakeholders (e.g., CapeNature, Endangered Wildlife Trust) prior to construction;
- Strategic rehabilitation and restoration of currently modified areas within areas of high sensitivity to be initiated concurrently with the construction phase;
- Minimization of development footprint and utilization of existing roads and existing modified areas for temporary laydown areas and site buildings;
- Rehabilitate disturbed areas that are not required by the operational phase of the development;
- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be allowed;
- An environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes topics such as avoiding fire hazards, littering, appropriate handling of pollution and chemical spills, minimizing wildlife interactions, remaining within demarcated construction areas;
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill;
- No open fires to be permitted outside of designated areas.

Residual impact	Some residual impact is likely; however, available habitats are widespread and the size of the development footprint is relatively small compared to the total project area. In-situ habitat restoration would result in a net-gain.
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**Impact Phase: Construction**

**Nature of the impact:** Exclusion of animal SCCs from areas that remain outside of the immediate development footprint.

**Impact Status:** Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	2	3	3	3	3
<b>With Mitigation</b>	Local	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (33)		Moderate Positive (44)		
Was public comment received?	No				

**Impact Phase: Construction**

Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- The production of an appropriate rehabilitation and restoration plan with the aims of improving and monitoring habitat availability and connectivity, in consultation with specialists and relevant stakeholders (e.g., CapeNature, Endangered Wildlife Trust) prior to construction;
- Strategic rehabilitation and restoration of currently modified areas to be initiated concurrently with the construction phase;
- Fencing and road designs to allow for passage of animals (e.g., appropriately sized culverts in roads and wildlife friendly fencing);
- Appropriate water runoff control measures to be constructed on all hard surfaces;
- Appropriate erosion control measures to be constructed on all servitudes and access roads in the project area;
- Rehabilitate existing servitude and access roads in the project area with sufficient erosion control measures to prevent the loss of soil and the degradation of vegetation.

Residual impact	Net-gain of available habitat and connectivity through restoration of potential movement corridors currently modified by agricultural activity.
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**Impact Phase: Construction**

**Nature of the impact:** The displacement or disturbance of fauna due to construction activities

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Recoverable	High	Highly Probable
<b>Score</b>	1	2	3	4	4
<b>With Mitigation</b>	Site	Short term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	2	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)		Low Negative (18)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Restrict construction activity to daylight hours;
- Minimize activity that occurs between dusk and dawn;
- Pre-construction baseline animal monitoring programme, with focus on areas identified for the construction footprint during the design phase (e.g., road network);
- Avoidance of remaining natural or near-natural habitats for laydown areas and temporary site offices
- Clearly demarcated construction areas and no unauthorized personnel to be permitted beyond demarcated areas;
- Adequate noise reduction measures (where possible) on heavy machinery;

**Impact Phase: Construction**

- Construction areas and site buildings should be lit with as little light as practically possible, with lights directed downwards where appropriate to reduce the disturbance and foraging activities of nocturnal species;
- No dogs or cats other than those of the landowners permitted on site as these animals cause unnecessary disturbance such as chasing fauna.

Residual impact	None
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Impact Phase: Construction

**Nature of the impact:** Direct impact to fauna caused by construction activities, such as increased risk of injury or mortality from collision with vehicles due to increased traffic, the increased possibility of illegal hunting, poaching, persecution or harvesting of fauna

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Recoverable	High	Highly Probable
<b>Score</b>	1	2	3	4	4
<b>With Mitigation</b>	Site	Short term	Recoverable	High	Low Probability
<b>Score</b>	1	2	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)		Low Negative (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be permitted;
- No movement of construction vehicles between dusk and dawn;
- Implementation and enforcement of speed limits (30 km/h);
- Roadkill monitoring and recording programme;
- Induction toolbox talk to construction personnel to increase awareness about animal SCCs present in the broader area and roadkill risks;
- No unauthorized movement of personnel;
- No unauthorized access to the construction site;
- No trenches or excavations to be left uncovered overnight;
- Trenches, excavations and cattle grids to have slopes to allow for animals to escape should they fall in;
- No hunting permitted;
- No dogs or cats permitted (other than those of the landowner);
- The collection, hunting or harvesting of animals at the site should be strictly forbidden;
- Any fauna directly threatened by the construction activities should be removed to a safe location by the environmental control officer or other suitably qualified person.

Residual impact	None
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**Impact Phase: Construction****Nature of the impact:** Mortality of animal SCCs as an indirect result of construction activities**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Recoverable	High	Highly Probable
<b>Score</b>	1	2	3	4	4
<b>With Mitigation</b>	Site	Short term	Recoverable	High	Low Probability
<b>Score</b>	1	2	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)		Low Negative (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Waste management programme to prevent trash buildup attracting species such as crows;</li> <li>Roadkill to be immediately reported to the environmental control officer, removed and suitably disposed of to prevent scavenging (e.g., buried);</li> <li>Construction activity to be minimized during the night to reduce noise pollution during periods when Riverine Rabbit are most active in the broader area.</li> </ul>					
Residual impact	None				

**10.4.2 OPERATIONAL PHASE**

The following impacts are identified as the major impacts that are likely to be associated with the development of the Khoe WEF:

- Direct Habitat Loss;
- Indirect Habitat Loss;
- Disturbance/displacement;
- Direct Mortality; and
- Indirect Mortality.

**Impact Phase: Operational****Nature of the impact:** Direct habitat loss through altered fire regimes**Impact Status:** Negative

<b>Impact Phase: Operational</b>					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probable
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Local	Long term	Recoverable	High	Low Probability
<b>Score</b>	2	4	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (52)		Low Negative (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The implementation of an appropriate rehabilitation and restoration plan with the aims of improving and monitoring habitat availability and connectivity;</li> <li>No open fires to be permitted outside of designated areas;</li> <li>Environmental Management Programme must include prescribed burn regimes that match natural frequencies and intensity as closely as appropriate; and</li> <li>Novel infrastructure must be compatible with fire regimes appropriate for the habitat types present across the site.</li> </ul>					
Residual impact	None				

<b>Impact Phase: Operational</b>					
<b>Nature of the impact:</b> Effective reduction in available habitat through restriction of animal movement, reduced habitat integrity or increased competition					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probable
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Local	Long term	Recoverable	High	Low Probability
<b>Score</b>	2	4	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (52)		Low Negative (26)		
Was public comment received?	No				

**Impact Phase: Operational**

Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- Wildlife friendly road and fence crossings to be frequently serviced to facilitate passage of fauna across the site (e.g., road culverts to be cleared of debris);
- Livestock grazing pressure must be reduced in natural, near-natural and recovered areas;
- Flow and erosion control measures to be continually monitored for efficacy and remedied if pooling, sedimentation or erosion is observed;
- Previously disturbed areas such as road verges, lay-down areas and areas utilized by temporary construction facilities must be regularly monitored to detect the establishment of alien species and those species should be eradicated before they spread;
- Regular alien clearing should be conducted, as needed, using the best-practice methods for the species concerned, the use of herbicides should be avoided as far as possible.

Residual impact	None
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**Impact Phase: Operational**

**Nature of the impact:** Disturbance and/ or displacement of animals due to routine operational activity

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	4	3
<b>With Mitigation</b>	Local	Long term	Reversible	High	Low Probability
<b>Score</b>	2	4	1	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (33)		Low Negative (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Minimized lighting;
- Minimize activity that occurs between dusk and dawn;
- Adequate noise reduction measures (where possible) on machinery;
- Wind Turbine Generators should not spin below a certain cut-in speed, i.e., no free-spinning of WTG blades permitted;
- Speed limits should be strictly enforced to reduce unnecessary noise;
- No dogs or cats other than those of the landowners should be allowed on site as these animals cause unnecessary disturbance such as chasing fauna; and
- If possible, long-term animal monitoring program.

**Impact Phase: Operational**

Residual impact	Elevated background noise levels
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**Impact Phase: Operational**

**Nature of the impact:** Direct mortality through collision, entrapment and illegal collecting or poaching of animals

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	4	4
<b>With Mitigation</b>	Local	Long term	Reversible	High	Low Probability
<b>Score</b>	2	4	1	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (44)		Low Negative (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Strictly enforced speed limits;</li> <li>• Strictly controlled site access;</li> <li>• Minimized movement of personnel vehicles at night;</li> <li>• Wildlife friendly road crossings (including culverts that allow animal movement below the road surface);</li> <li>• Signage, education and awareness induction training about relevant animal SCCs to personnel;</li> <li>• Wildlife-friendly fencing and cattle grids.</li> </ul>					
Residual impact	None				

**Impact Phase: Operational**

**Nature of the impact:** Indirect mortality from increased predator densities and/ or reduced predator avoidance ability



**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Long term	Irreversible	High	Highly Probable
<b>Score</b>	1	4	5	4	4
<b>With Mitigation</b>	Site	Long term	Recoverable	Low	Probable
<b>Score</b>	1	4	3	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (56)		Low Negative (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Overhead Transmission Lines to be of a type and design that reduces nesting opportunities (e.g., solid pylon design);</li> <li>Nest and perch deterrents on transmission line pylons;</li> <li>Waste management programme to be implemented;</li> <li>Roadkill to be reported and immediately removed for adequate disposal that prevents scavenging (e.g., buried); and</li> <li>No spinning wind turbine generators at wind speeds below a certain cut-in speed (i.e. no free-spinning blades).</li> </ul>					
Residual impact	Elevated background noise levels				

**Impact Phase: All**

**Nature of the impact:** Impacts of all phases of the proposed development on ecological processes of the area

**Impact Status:** Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probable
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Local	Long term	Recoverable	High	Probable
<b>Score</b>	2	4	3	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (52)		Moderate Positive (39)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes, identification and improvement of potential corridors is the primary aim of recommended mitigation measures				

**Impact Phase: All**

Mitigation measures to reduce residual risk or enhance opportunities:

- In-situ habitat restoration designed to improve connectivity between natural/near-natural patches and facilitate animal SCC movement across the site (do be done by a specialist in consultation with appropriate stakeholders);
- Restoration and rehabilitation of currently modified agricultural land;
- Partner with the Drylands Conservation Programme of the Endangered Wildlife Trust to enhance the ecosystem processes across the site, e.g. through the Biodiversity Stewardship Programme and/ or the provision of research support;
- Initiation of formal, long-term research programmes across the site, offering access to the property for the purposes of research on riverine rabbit if/when approached by appropriately recognised academic institutions; and
- Site-specific Environmental Management Programme.

Residual impact	Enhancement of ecological processes
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**10.5 FLORA**

The impacts that will be most prevalent during the Construction Phase of the proposed Khoe WEF are:

- Vegetation Clearing
- Chemical Contamination
- Altered Flow Regimes
- Mortality

**10.5.1 CONSTRUCTION PHASE AND DECOMMISSION PHASES****Impact Phase: Construction**

**Nature of the impact:** Potential vegetation clearing impacts associated with the construction and decommissioning phase of the proposed development

**Description of Impact:** Certain areas will need to be cleared of vegetation to facilitate construction of associated infrastructure and transport of personnel on site. This impact can negatively affect endemic, threatened or important flora species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	2	3	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (44)		Low Negative Impact (24)		
Was public comment received?	No				

**Impact Phase: Construction**

Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- The development footprint must avoid No-Go/ High Sensitivity areas as much as possible.
- Limit the area of impact as much as possible.
- Where micro-siting takes place, a pre-construction walkthrough during the optimal flowering period (spring) of the finalized development layout must be conducted to ensure that No-Go and High Sensitivity areas are avoided where possible.
- Ensure that lay-down and other temporary infrastructure are within Low Sensitivity areas.
- Rehabilitate disturbed areas that are not required by the operational phase of the development.
- All construction staff on site must attend an environmental induction to ensure that basic environmental principles are adhered to. This includes topics such as avoiding fire hazards, no littering, appropriate handling of pollution and chemical spills, remaining within demarcated construction areas, avoidance of No-Go areas and sensitive habitats etc.
- Demarcate sensitive areas near the development footprint as no-go areas with construction tape or similar and clearly marked as No-Go areas.
- An EMPr must be implemented and must provide a detailed description of how construction activities must be conducted to reduce unnecessary clearing and/or destruction of habitat.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in soil erosion and alien invasive species establishing themselves before natural flora can. All mitigation measures would need to be adhered to and continuous monitoring and maintenance is required after construction.
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**Impact Phase: Construction**

**Nature of the impact:** Potential chemical contamination impacts associated with the construction phase of the proposed development.

**Description of Impact:** Chemical contamination during the Construction phase. Spillage of construction materials or chemicals can adversely impact waterbodies and the flora on which they depend.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

**Impact Phase: Construction**

- The development footprint must avoid High Sensitivity areas as much as possible.
- Ensure proper storage and handling of chemicals (fuel, lubricants, cleaning agents) used on-site. Store all chemicals in designated areas equipped with spill containment measures to prevent leaks and spills.
- A chemical spill response plan must be developed before construction activities are undertaken. This spill response plan must be implemented by an ECO on site.
- Provide appropriate training to construction staff on the safe handling of chemical and hazardous materials.
- Implement measures to prevent runoff to nearby waterbodies by installing sediment traps and/or containment pods. This should be addressed in the Stormwater Assessment.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in aquatic systems on site as well as soil cover. The use of chemicals on site should be limited as far as possible and environmentally friendly alternatives should be utilized, resulting in no major residual impacts associated with the phase.
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**Impact Phase: Construction**

**Nature of the impact:** Potential altered flow regime impacts associated with the construction phase of the proposed development.

**Description of Impact:** Construction of infrastructure may alter water flow characteristics such as runoff, sedimentation and infiltration. These could change vegetation community composition, soil depth, and habitat suitability over time.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Adequate flow and erosion control measures should be included in the EMPr.
- Ongoing monitoring and rehabilitation of disturbed areas must be implemented.
- All recommendations in the Stormwater Assessment must be strictly adhered to.

Residual impact	Vegetation clearing may impact runoff and infiltration rates. As a result, residual impacts may occur after mitigation measures have been applied, but these impacts are manageable.
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**Impact Phase: Construction/ Decommissioning**

**Nature of the impact:** Potential mortality of flora species due to direct and indirect impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Direct mortality due to increased traffic and illegal collection/poaching/entrapment, and indirect mortality due to potential increased herbivore presence and decreased detection can occur during the Construction and Decommissioning Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	Very High	Highly Probably
<b>Score</b>	2	4	5	5	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (64)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>No movement of construction vehicles between dusk and dawn.</li> <li>Induction toolbox talk to construction personnel to increase awareness about flora SCCs present.</li> <li>No unauthorized movement of personnel.</li> <li>No unauthorized access to the construction site.</li> <li>A Plant Rescue and Rehabilitation Plan must be designed before construction takes place and implemented during all phases of the project lifecycle.</li> </ul>					
Residual impact	Residual impacts include direct mortality of species of conservation concern as a result of activities associated with the WEF.				

The anticipated impacts for the operational phase of the proposed development are:

- Potential Encroachment of Alien Invasive Species
- Flora Mortality and Loss of SCC
- Soil erosion
- Unwanted Fires

### 10.5.2 OPERATION PHASE

**Impact Phase: Operation**

**Nature of the impact:** Potential encroachment of alien invasive species resulting in loss of flora SCC associated with the operational phase of the proposed development.

**Description of Impact:** Movement of personnel, and increased disturbance puts the proposed development area at greater risk of alien invasive species moving into and spreading within the area.

**Impact Phase: Operation**

Alien invasive species will encroach into disturbed areas left behind by construction activities and may go undetected during the operational phase. This impact results in the potential loss of flora SCC or endemic species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Definite
<b>Score</b>	2	4	5	5	5
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (80)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Disturbed areas such as road verges, lay-down areas and areas utilised by temporary construction facilities must be regularly monitored to detect the establishment of alien species and those species should be eradicated before they spread.
- Regular alien clearing should be conducted, as needed, using the best-practice methods for the species concerned, the use of herbicides should be avoided as far as possible.
- The use of herbicides (if absolutely required) for the control and eradication of alien grasses should be done in accordance with the alien eradication programme in the EMPr to reduce unintended ecological impacts.

Residual impact	Residual impacts include loss of natural flora and suitable habitat due to encroachment of alien invasive species.
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**Impact Phase: Operation**

Nature of the impact: Potential fire impacts associated with the operational phase of the proposed development.

Description of Impact: Increased personnel on site increases the fire risk due to smoking and/or use of electrical equipment on site.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3

**Impact Phase: Operation**

Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)	Low Negative Impact (30)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>No open fires should be permitted outside of designated areas.</li> <li>Smoking areas must be defined, and no smoking should be permitted outside of designated areas.</li> <li>An emergency response plan for uncontrolled fires must be in place prior to operation and implemented for the duration of the WEF's lifespan.</li> <li>All staff members must have a Fire and Safety induction to increase awareness.</li> </ul>		
Residual impact	Residual impacts include loss of flora SCC. This is why it is critical to manage unplanned fires as soon as possible to avoid mortality.	

**Impact Phase: Operation**

**Nature of the impact:** Potential floral mortality and loss of SCC impacts associated with the operational phase of the proposed development.

**Description of Impact:** Direct mortality/loss of flora species is anticipated due to increased traffic on site and illegal collection. Targeted illegal harvesting may pose a risk as the WEF may offer greater ease of access to the public.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probable
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
Significance Calculation	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- An environmental induction for all staff on site to identify SCC.

**Impact Phase: Operation**

- Demarcate sensitive areas, where SCC have been confirmed present near the development footprint as No-Go areas.
- Site access should be controlled, and no unauthorised persons should be allowed onto the site to limit illegal harvesting.
- The collection or harvesting of any plants at the site should be strictly forbidden.
- Establish a monitoring program to assess the effectiveness of mitigation measures and track changes in floral communities over time. Use the results of monitoring to inform adaptive management strategies and make adjustments as needed to minimize direct floral mortality and optimize conservation outcomes.

Residual impact	Residual impacts include loss flora SCC from the natural environment.
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**Impact Phase: Operation**

**Nature of the impact:** Potential soil erosion impacts associated with the operational phase of the proposed development.

**Description of Impact:** Soil erosion facilitated by clearing vegetation and increased road use promotes soil displacement and loss during the Operational Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Utilize existing servitudes and access roads wherever possible, any new roads or the upgrading of roads should be minimized as far as possible and not be larger than required.
- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be allowed.
- Ensure that sufficient erosion control measures are constructed on all servitudes and access roads in the project area, including where such crosses waterbodies.
- Rehabilitate existing servitude and access roads in the project area with sufficient erosion control measures to prevent the loss of soil and the degradation of vegetation.
- Construction activities in or near drainage lines, washes or temporary inundated depressions must only take place during the dry season.
- An environmental management programme (EMPr) must be implemented and must provide a detailed description of how construction activities must be conducted to avoid increased erosion.



**Impact Phase: Operation**

- Erosion management at the site should take place according to the Erosion Management Plan and Rehabilitation Plan included in the EMP.
- All roads and other hardened surfaces should have runoff control features which redirect water flow and dissipate energy in the water stream which may pose an erosion risk.
- Regular monitoring for erosion after construction to ensure that no erosion problems have developed as result of the disturbance during the operation of the project.

Residual impact	Residual impacts include changes to infiltration rates and loss of soil fertility.
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**10.6 AVIFAUNA**

The avifaunal community is comprised most importantly of raptors, cranes and bustards. All high-risk areas for birds have been avoided by placing turbines out of the high sensitivity and no-go areas and by placing buffers around nests in accordance with current Best Practice Guidelines. The potential impact to the avian community is provided for each proposed phase, i.e., construction, operation and decommission of the proposed development.

The following impacts are identified as the major impacts that are likely to be associated with the development of the Khoe WEF:

- Displacement of Priority species due to disturbance

**10.6.1 CONSTRUCTION PHASE****Impact Phase: Construction**

**Nature of the impact:** Displacement of Priority species due to disturbance

Description of Impact:

Generally negative due to displacement of Priority species due to disturbance associated with the construction of the wind turbines and associated infrastructure. No direct fatalities of birds expected during this phase. Generally short term (approx. 24 months)

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Irreversible	High	Highly likely
<b>Score</b>	2	2	4	5	4
<b>With Mitigation</b>	Site	Short term	Reversible	Medim - High	Probable
<b>Score</b>	2	2	4	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (70)		Moderate – High Negative Impact (39)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

**Impact Phase: Construction**

## Mitigation for WEF site construction:

- Construction activity should be restricted to the immediate footprint of the infrastructure as far as possible and should avoid all sensitive areas (e.g., CRM-designated high-risk areas, wetlands).
- Measures to control noise and dust should be applied according to current best practice in the industry.
- Roads and tracks to avoid all identified sensitive areas wherever possible.
- An avifaunal walk-down should be conducted to confirm final layout and identify any sensitivities that may arise between the conclusion of the EIA process and the construction phase.

Residual impact	The disturbance of birds is somewhat inevitable by activities on site, although the most sensitive receptors (e.g., CRM-designated high-risk areas) have already been protected through avoidance, through the application of No-Go buffers. Post-construction monitoring recommended by Birdlife South Africa guidelines will help identify residual impacts should they occur and recommend further mitigations, if required.
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The following impacts are identified as the major impacts that are likely to be associated with the operation of the Khoe WEF:

- Bird Collision, habitat alteration and displacement

**10.6.2 OPERATION PHASE****Impact Phase: Operation**

**Nature of the impact:** Bird Collision, habitat alteration and displacement

## Description of Impact:

Generally negative due to potential for collision, habitat alteration and displacement, of five Red Data species or two Least Concern species through the operation of the turbines and activity on site

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Long term	Reversible	Highly	Highly likely
<b>Score</b>	1	4	4	5	5
<b>With Mitigation</b>	Site	Long term	Reversible	Moderate	Probable
<b>Score</b>	1	4	4	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (70)		Moderate - High (39)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

## Mitigation measures to reduce residual risk or enhance opportunities:

- Re-position all turbines that fall within the high-risk zones delineated by the CRM to lower risk areas (as also identified by the CRM).
- The high-risk No-Go zones delineated by the CRM should be adhered to (as depicted in this report).

**Impact Phase: Operation**

- A post-construction programme must be conducted by an avifaunal specialist (following the Birds and Renewable Energy Specialist Group guidelines) to:
  - (i) assess turbine-related fatalities; and
  - (ii) confirm that all mitigations have been appropriately adhered to and, in particular, that road and hard stand verges do not provide additional substrate for raptor prey species.

A bird fatality threshold and adaptive management policy must be designed by an ornithologist for the site, prior to construction. This policy should form an annexure of the operational EMP for the facility. Most importantly, this policy should identify the number of bird fatalities of Priority species which will trigger a management response, appropriate responses, and timelines for such responses. In general, it is recommended that should one Red Data species or two or more LC species be killed per turbine per year then those turbines will require further mitigation.

- Should the identified Priority bird species fatality thresholds be exceeded in Year 1 and 2, either (i) an automated turbine Shutdown on Demand (SDOD) programme must be immediately initiated; or
- (ii) appropriate alternative mitigation (e.g. striped blade, human-SDOD) must be implemented on site. The latter programme must consist of a suitably qualified, trained, and resourced team of observers present on site for all daylight hours 365 days of the year. This team must be stationed at vantage points (VPs) with full visible coverage of all turbine locations (typically 1 VP covering four turbines). The observers must detect incoming Priority bird species, track their flights, judge when they enter a turbine proximity threshold, and alert the control room to shut down the relevant turbine until the risk has passed. A full detailed method statement or protocol must be designed by an ornithologist.

Residual impact	Direct mortality through collision, or area avoidance, may occur if cranes, raptors, and bustards remain here and the mitigations are insufficient. This possibility can be gauged from a systematic monitoring programme. There is some uncertainty around the effectiveness of bird-turbine collision mitigation at this stage in South Africa. As a result, the significance remains as "Moderate" post mitigation. Note that these can be reduced with additional mitigations.
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**10.7 BATS**

**10.7.1 CONSTRUCTION PHASE**

The impact of the proposed Khoe WEF on bats in the area is discussed below. The potential impacts during the construction phase are summarised as:

- Clearing and excavation of natural habitat;
- Creating attractive bat habitat within the development terrain; and
- Disturbance of bats and bat roosts by construction noise, especially during night-time.

**Construction Phase**

**Nature of the impact:** Clearing and excavation of natural habitat

**Description of impact:** The destruction of features that could serve as potential roosts, such as rock formations and derelict aardvark holes, and the removal of trees or the fragmentation of woody habitat which includes dense bushes. The removal of limited trees and bushes would have also an impact on the foraging potential of clutter and clutter-edge-specific species.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Definite

Construction Phase					
<b>Score</b>	2	3	3	3	5
<b>With Mitigation</b>	Local	Short Term	Recoverable	Low	Probable
<b>Score</b>	2	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (55)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Apart from access roads and the management building, construction activities are to be kept out of all high bat-sensitive areas as far as possible.</li> <li>• Rock formations occurring along the ridge lines should be avoided during construction, as these could serve as roosting space for bats.</li> <li>• Destruction of limited trees should be avoided during construction.</li> <li>• Care should be taken if any dense bushes are destroyed, to make sure that there are not bat roosts in the vegetation. If bat roosts are found, a bat specialist should be contacted immediately.</li> <li>• Aardvark holes or any large derelict holes or excavations should not be destroyed before careful examination for bats.</li> <li>• The ECO or a responsible appointed person or site manager should contact a bat specialist before construction commences so that they know what to look out for during construction.</li> </ul>					
Residual impact	Yes, natural habitat will be removed, but with rehabilitation a component of this could be replaced.				

Construction Phase					
<b>Nature of the impact:</b> Creating attractive bat habitat within the development terrain					
<b>Description of impact:</b> Creating new habitat amongst turbines which might attract bats. This includes buildings with roofs that could serve as roosting space or open water sources from quarries or excavation where water could accumulate.					
Impact Status: Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Highly probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Reversible	Very Low	Low probable
<b>Score</b>	1	2	1	1	2
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		

Construction Phase	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (44)      Low Negative Impact (10)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Completely seal off roofs of new buildings (e.g., substations and site buildings). Note a small bat species could enter a hole the size of 1 cm<sup>2</sup>.</li> <li>• Roofs need to be regularly inspected during the lifetime of the wind farm and any new holes need to be sealed.</li> <li>• Excavation areas, quarries or any other artificial depressions should be filled and rehabilitated to avoid creating new areas of open water sources which could attract bats during rainy spells.</li> <li>• Inspect all existing buildings and infrastructure for possible roosting opportunities regularly, at least on a seasonal basis. If any holes are found, the ECO or operational bat specialist should be contacted to establish whether there are any bats in the roofs. If there is a roost in the roof, a bat specialist should be consulted.</li> </ul>	
Residual impact	No residual impact if mitigation measures are applied.

Construction Phase																															
<b>Nature of the impact:</b> Construction noise																															
<b>Description of impact:</b> Disturbance of bats and bat roosts by construction noise, especially during night-time.																															
Impact Status: Negative																															
	<table border="1"> <thead> <tr> <th></th> <th>Extent</th> <th>Duration</th> <th>Reversibility</th> <th>Magnitude</th> <th>Probability</th> </tr> </thead> <tbody> <tr> <td><b>Without Mitigation</b></td> <td>Local</td> <td>Short Term</td> <td>Reversible</td> <td>Low</td> <td>Definite</td> </tr> <tr> <td><b>Score</b></td> <td>2</td> <td>2</td> <td>1</td> <td>2</td> <td>5</td> </tr> <tr> <td><b>With Mitigation</b></td> <td>Site</td> <td>Short Term</td> <td>Reversible</td> <td>Very Low</td> <td>Definite</td> </tr> <tr> <td><b>Score</b></td> <td>1</td> <td>2</td> <td>1</td> <td>1</td> <td>5</td> </tr> </tbody> </table>		Extent	Duration	Reversibility	Magnitude	Probability	<b>Without Mitigation</b>	Local	Short Term	Reversible	Low	Definite	<b>Score</b>	2	2	1	2	5	<b>With Mitigation</b>	Site	Short Term	Reversible	Very Low	Definite	<b>Score</b>	1	2	1	1	5
	Extent	Duration	Reversibility	Magnitude	Probability																										
<b>Without Mitigation</b>	Local	Short Term	Reversible	Low	Definite																										
<b>Score</b>	2	2	1	2	5																										
<b>With Mitigation</b>	Site	Short Term	Reversible	Very Low	Definite																										
<b>Score</b>	1	2	1	1	5																										
<b>Significance Calculation</b>	Without Mitigation      With Mitigation																														
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (35)      Low Negative Impact (25)																														
Was public comment received?	No																														
Has public comment been included in mitigation measures?	No																														
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Noise levels should be prevented as far as possible.</li> <li>• Avoid night-time construction activities as much as possible.</li> </ul>																															
Residual impact	No residual impact if mitigation measures are applied.																														

### 10.7.2 OPERATIONAL PHASE

The impact of the proposed Khoe WEF on bats in the area is discussed below. The potential impacts during the operation phase are summarised as:

- Mortality due to direct collision or barotrauma of resident bats;
- Mortality due to direct collision or barotrauma of migrating bats;
- Loss of bats of conservation value;
- Fatality curiosity;
- Smaller genetic pool; and
- Foraging space lost due to the turning of turbine blades.

#### Operation Phase

**Nature of the impact:** Direct collision or barotrauma

**Description of impact:** Bat fatalities through direct collision, or barotrauma of resident bats occupying the airspace amongst the turbines. The turning blades of the turbines during operation are the most important aspect of the project that would impact negatively on bats.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long Term	Irreversible	High	Definite
<b>Score</b>	3	4	5	4	5
<b>With Mitigation</b>	Regional	Long Term	Recoverable	Moderate	Definite
<b>Score</b>	3	4	3	3	5
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (80)		High Negative Impact (65)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- All turbines and turbine components, including the rotor-swept zone, should be kept out of all high-sensitivity zones.
- Mitigation measures should be applied after testing and as soon as turbines start to turn.
- A bat specialist should be appointed before the turbines start to turn, and operational bat monitoring should start when all the turbines start to turn, for a minimum of two years, or as described by the latest South African bat guidelines.
- Mitigation should be discussed between the bat specialist and developer during the construction and operational phase. Mitigation measures should be applied.
- Except for compulsory lighting required in terms of civil aviation, artificial lighting should be minimised, especially bright lights. Lights should rather be turned downwards where possible. Turbine tower lights should be switched off when not in operation, if possible.

**Operation Phase**

- Two years of compulsory bat monitoring as per the latest South African Bat Assessment Association (SABAA) bat monitoring guidelines is recommended, but this might be extended, depending on the bat specialist.

Residual impact	Yes. The fatality of bats is irreversible, and it is expected that there will be a decline in the population of high-risk species, but with mitigation, the bat population will be able to survive and still be functional. The resource will not be damaged irreparably but will be altered.
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### Operation Phase

**Nature of the impact:** Fatality of migrating bats

**Description of impact:** A limited number of calls like that of Natal Long-fingered bat a migration species, had been recorded. Fruit bats on migration might also traverse the site. Limited research is available on the migration of bats in South Africa, and some of the bat species occurring on-site might also traverse the area during migration.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	National	Long term	Recoverable	Moderate	Probable
<b>Score</b>	4	4	3	3	3
<b>With Mitigation</b>	National	Long term	Recoverable	Low	Low probability
<b>Score</b>	4	4	3	2	2
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (42)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Care should be taken during post-construction monitoring to verify the activity of Natal Long-fingered bat, especially within the rotor swept area of the turbine blades. Carcasses should be identified to establish the fatality of this species.
- All turbines and turbine components, including the rotor swept zone, should be kept out of all high sensitivity zones.
- Mitigation measures should be applied as soon as the test period of turbines is completed, and the turbines start turning.
- A bat specialist should be appointed before the turbines start to turn and operational bat monitoring should start when all the turbines start to turn, for a minimum of two years, or as described by the latest South African bat guidelines.
- Mitigation should be discussed between the bat specialist and developer during the construction and operational phase. Mitigation measures should be applied.
- Except for compulsory lighting required in terms of civil aviation, artificial lighting should be minimised, especially bright lights. Lights should rather be turned downwards where possible. Turbine tower lights should be switched off when not in operation, if possible.
- Two years of compulsory bat monitoring as per the latest SABAA bat monitoring guidelines is recommended, but this might be extended, depending on the bat specialist.

Residual impact	Not expected due to the low number of migratory bats, but some of the fruit bats do not echolocate and one will only truly know the situation through carcass searches during the operational phase.
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### Operation Phase

**Nature of the impact:** Loss of bats of conservation value

**Description of the impact:** The endemic Long-tailed house bat (Medium to high risk of fatality) was recorded and Geoffroy's horseshoe bat (Low risk), although not recorded on site, might occur in the valley areas and protea veld with relatively denser vegetation.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	Moderate	Probable
<b>Score</b>	3	4	3	3	3
<b>With Mitigation</b>	Regional	Long term	Reversible	Low	Low probability
<b>Score</b>	3	4	1	2	2
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Refer to table above – same mitigation to be implemented</li> </ul>					
Residual impact	Not expected due to the low number of bats of conservation value that have been recorded, but one will only truly know the situation through carcass searches during the operational phase.				

### Operation Phase

**Nature of the impact:** Fatality curiosity

**Description of the impact:** Bat mortality due to the attraction of bats to wind turbines (Horn et al. 2008). Bats have been shown to sometimes be attracted to wind turbines out of curiosity or reasons still under investigation.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	Moderate	Probable
<b>Score</b>	2	4	3	3	3
<b>With Mitigation</b>	Local	Long term	Reversible	Low	Probable
<b>Score</b>	2	4	1	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Low Negative Impact (28)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Except for compulsory lighting required in terms of civil aviation, artificial lighting should be minimized, especially bright lights. Lights should rather be turned downwards. Turbine tower lights should be switched off when not in operation, if possible.</li> <li>Little is known about this impact and mitigation could be adapted if more research becomes available.</li> </ul>					
Residual impact	With mitigation, it is not expected that there will be a residual impact.				

**Operation Phase**

**Nature of the impact:** Smaller genetic pool

**Description of impact:** Reduction in the size, genetic diversity, resilience, and persistence of bat populations. Bats have low reproductive rates and populations are susceptible to reduction by fatalities other than natural death. Furthermore, smaller bat populations are more susceptible to genetic inbreeding.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	Moderate	Highly probable
<b>Score</b>	3	4	3	3	4
<b>With Mitigation</b>	Regional	Long term	Recoverable	Low	Probable
<b>Score</b>	3	4	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Moderate Negative Impact (36)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Refer to mitigation measures under direct collision</li> </ul>					
Residual impact	Would the genetic pool be reduced due to high fatality resulting from the wind farm, it will depend on the severity of the influence, and it might take decades to recover.				

**Operation Phase**

**Nature of the impact:** Foraging space lost due to the turning of turbine blades

**Description of impact:** Loss of habitat and foraging space during operation of the wind turbines

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	High	Definite
<b>Score</b>	3	4	3	4	5
<b>With Mitigation</b>	Regional	Long term	Reversible	Moderate	Definite
<b>Score</b>	3	4	1	3	5
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (70)		Moderate Negative Impact (55)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Refer to Fatality of migrating bats for mitigation measures</li> </ul>					
Residual impact	No, if turbines are decommissioned, the foraging space will be available to bats again.				

### 10.7.3 DECOMMISSIONING PHASE

The impact of the proposed Khoe WEF on bats in the area is discussed below. The potential impacts during the Decommissioning phase are summarised as:

- Disturbance due to decommissioning activities.

### Decommissioning Phase

**Nature of the impact:** Decommissioning activities

**Description of impact:** Decommissioning activities at the end of the wind farm's lifespan

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short term	Recoverable	Moderate	Definite
<b>Score</b>	1	2	2	3	5
<b>With Mitigation</b>	Local	Short term	Reversible	Low	Definite
<b>Score</b>	1	2	1	2	5
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (40)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Artificial lighting during decommissioning should be minimized as much as possible, especially bright lights or spotlights. Lights should avoid skyward illumination.</li> <li>Night-time decommissioning activities should be avoided as far as possible.</li> </ul>					
Residual impact	If mitigation measures are followed there should be no residual impact.				

## 10.8 HERITAGE AND ARCHAEOLOGY

During the construction of the WEF, the following activities may result in physical impacts to the landscape and to heritage resources that lie in or on it:

- Excavations to construct the foundations for WTGs and other WEF infrastructure;
- Leveling of ground for WTG and other laydown areas;
- Construction of roads or tracks to service the installation of the WTGs and their longer-term maintenance during operation; and
- Introduction of vehicles, machinery and people into environment.

The introduction of semi-industrial features to the area can have an impact on the cultural landscape.

### 10.8.1 CONSTRUCTION, OPERATION AND DECOMMISSIONING PHASE

From the information collected for the HIA, indications are that impacts to pre-colonial archaeological sites and material are unlikely or will be very limited.

Significant impacts on archaeological resources during the construction, operational and decommissioning phases of the Khoe WEF are thus not anticipated.

**Impact Phase: Construction**

**Nature of the impact:** Disturbance or destruction of archaeological sites and/or materials

**Description of Impact:**

Disturbance or destruction of archaeological sites and/or materials resulting from earthworks and excavations associated with the WEF. This includes:

- Excavations to construct the foundations for WTGs and other WEF infrastructure;
- Leveling of ground for WTG, laydown areas and the substation; and
- Construction of roads or tracks to service the installation of the WTGs and their longer-term maintenance during operation.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Permanent	Irreversible	Low	Low Probability
<b>Score</b>	2	3	5	2	2
<b>With Mitigation</b>	Local	Permanent	Irreversible	Very Low	Low Probability
<b>Score</b>	2	3	5	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)		Low Negative Impact (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• A pre-construction archaeological walkdown survey of the final WEF layout is recommended.</li> <li>• Any archaeological sites or material encountered during construction activities must be reported to the ECO by contractors, and HWC must be notified of HWC of any such discovery by the ECO so that the find can be assessed, and arrangements made to mitigate it, if necessary.</li> </ul>					
Residual impact	If mitigation measures are followed there should be no residual impact.				

**Construction, Operation and Decommissioning**

**Nature of the impact:** Disruption of the cultural landscape due to the presence of construction equipment and activity

**Description of Impact:**

Disruptions to views and sense of place resulting from the construction activities, and the introduction of WEF infrastructure into the landscape.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long-term	Irreversible	High	Definite
<b>Score</b>	2	4	5	4	5

Construction, Operation and Decommissioning					
<b>With Mitigation</b>	Local	Long-term	Recoverable	Moderate	Definite
<b>Score</b>	2	4	3	3	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (75)		Moderate Negative Impact (60)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk:					
<ul style="list-style-type: none"> <li>Keep the construction duration as short as possible and as much of the activity as possible out of the public view.</li> <li>In particular the infrastructure area(s) should be screened if possible, and noise and light pollution kept to a minimum.</li> </ul>					
Residual impact	The implementation of mitigation measures will reduce residual impacts.				

## 10.9 PALEONTOLOGY

### 10.9.1 CONSTRUCTION PHASE

Construction Phase					
<b>Nature of the impact:</b> Disturbance or destruction of fossil material					
<b>Description of Impact:</b> Disturbance or destruction of palaeontological material resulting from earthworks and excavations associated with the construction of the WEF, particularly (but not exclusively) excavations for foundations for WTGs.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Permanent	Irreversible	Low	Low Probability
<b>Score</b>	2	3	5	2	2
<b>With Mitigation</b>	Local	Permanent	Irreversible	Very Low	Low Probability
<b>Score</b>	2	3	5	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (22)		Low Negative Impact (22)		
Was public comment received?	No				

### Construction Phase

Has public comment been included in mitigation measures? No

Mitigation measures to reduce risk or enhance opportunities:

- The EAP and ECO must be informed of the very high palaeontological significance of the WEF area;
- The Fossil Chance Find Protocol contained in the PIA, which is designed to record all unexpected fossils associated with the geological formations on site must:
  - be implemented during the construction WEF, and
  - be included as part of the EMPr for this project.
- If fossils are exposed during construction they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach; and
- Recommendations contained in the PIA must be approved by HWC for inclusion in the EMPr for the project.

Residual impact Provided the mitigation measures have been implemented there will be no residual impacts.

## 10.10 VISUAL/LANDSCAPE

### 10.10.1 CONSTRUCTION

During the construction period it is expected that any visual impact of concern on sensitive visual receptors within the study area will be temporary and limited to a short-term period (2-5 years). The below direct construction visual impacts of the proposed Khoe Wind Energy Facility are assessed as follows:

### Construction Phase

**Nature of the impact:** Visual impact of construction activities on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF.

**Description of Impact:**

During the construction period, there will be an increase in heavy vehicles utilising the roads to the construction sites that may cause, at the very least, a visual nuisance to landowners in the area within 5km from the proposed site. Additionally, dust as a result of the construction activities and construction equipment (i.e. cranes), temporary laydown areas, construction camps, etc. may also be visible at the site, resulting in a visual impact occurring during construction. Sensitive receptors in this zone consist of residents of various homesteads such as Oumur, Leeuhok as well as tourist accommodation offerings (Middelberg, Ezelszacht, Exemia PNR, Leeuwenboschfontein, Drie Kuilen PNR)

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Short term	Reversible	Very high	Definite
<b>Score</b>	4	2	1	10	5
<b>With Mitigation</b>	Very Short distance	Short term	Reversible	High	Highly Probable
<b>Score</b>	4	2	1	8	4



Construction Phase		
Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	<b>Very High Negative Impact (85)</b>	<b>High Negative Impact (64)</b>
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce risk or enhance opportunities: <u>Planning:</u>		
<ul style="list-style-type: none"> <li>Retain and maintain natural vegetation in all areas outside of the development footprint, but within the project site.</li> </ul>		
<u>Construction:</u>		
<ul style="list-style-type: none"> <li>Ensure that vegetation is not unnecessarily removed during the construction period.</li> <li>Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) where possible.</li> <li>Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.</li> <li>Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed of regularly at licensed waste facilities.</li> <li>Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).</li> <li>Restrict construction activities to daylight hours whenever possible in order to reduce lighting impacts.</li> <li>Rehabilitate all disturbed areas immediately after the completion of construction works.</li> </ul>		
<b>Residual impact</b>	None, provided that rehabilitation works are carried out as required.	

Construction Phase					
<b>Nature of the impact:</b> Nature of the impact: Visual impact of construction activities on observers travelling along roads within 5 km of the proposed WEF.					
<b>Description of Impact:</b> During the construction period, there will be an increase in heavy vehicles utilising the roads to the construction sites that may cause, at the very least, a visual nuisance to other road users and in the area within 5km from the proposed site. Additionally, dust as a result of the construction activities and construction equipment (i.e. cranes), temporary laydown areas, construction camps, etc. may also be visible at the site, resulting in a visual impact occurring during construction. Sensitive receptors in this zone consist of observers travelling along the R318 which cuts through the site and the N1 located to the north.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Short term	Reversible	Very high	Highly Probable
<b>Score</b>	4	2	1	10	4

Construction Phase					
With Mitigation	Very Short distance	Short term	Reversible	High	Probable
<b>Score</b>	4	2	1	8	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)			Moderate Negative Impact (42)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain and maintain natural vegetation in all areas outside of the development footprint, but within the project site.</li> </ul>					
<u>Construction:</u>					
<ul style="list-style-type: none"> <li>Ensure that vegetation is not unnecessarily removed during the construction period.</li> <li>Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) where possible.</li> <li>Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.</li> <li>Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed of regularly at licensed waste facilities.</li> <li>Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).</li> <li>Restrict construction activities to daylight hours whenever possible in order to reduce lighting impacts.</li> <li>Rehabilitate all disturbed areas immediately after the completion of construction works.</li> </ul>					
Residual impact	None, provided that rehabilitation works are carried out as required.				

### 10.10.2 OPERATIONAL

During the operational phase of the proposed Khoe Wind Energy Facility, it is generally accepted that the wind turbine structures associated with the proposed facility will constitute the largest visual impact of concern on sensitive visual receptors within the study area, as a result of their sheer scale in relation to other proposed infrastructure that may be located on the site. The below direct operational visual impacts of the proposed Khoe Wind Energy Facility are assessed as follows:

#### Operational Phase

**Nature of the impact:** Visual impact on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF.

### Operational Phase

**Description of Impact:** The operation of the Khoe Wind Energy Facility is expected to have a very high visual impact (significance rating = 90) on observers/visitors residing at homesteads and tourist accommodation facilities within a 5km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (90)		Very High Negative Impact (90)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>					
<u>Operations:</u>					
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>					
<u>Decommissioning:</u>					
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.</li> </ul>					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

### Operational Phase

**Nature of the impact:** Visual impact on observers travelling along the roads within 5 km to the proposed WEF.

**Description of Impact:** During the entire operational lifespan of the Khoe Wind Energy Facility, it is expected that daily commuters and possible tourists travelling along the various roads within 5km of the wind turbine structures may be negatively impacted upon by the visual exposure to the proposed infrastructure, however brief. It is assumed that the observers travelling along these roads will view the visual intrusion of the turbines in a negative light when compared with the rural and scenic quality of the surrounding landscape.

### Operational Phase

The operation of the Khoe Wind Energy Facility is expected to have a **high** visual impact on observers traveling along the roads within a 5km radius of the wind turbine structures. This includes observers travelling along the R318 and secondary road to the east.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (80)		High Negative Impact (80)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact on visitors to formally protected areas within 5-10 km to the proposed WEF.

**Description of Impact:**

The Khoe Wind Energy Facility could have a very high visual impact on visitors/ tourists to the Drie Kuilen Private Nature Reserve, a formally protected area as well as the following informal/conservation areas: Proposed Exemia PNR located within a 5 km radius of the wind turbine structures.

**Impact Status:** Negative

Operational Phase					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (95)		Very High Negative Impact (95)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities: <u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>					
<u>Operations:</u>					
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>					
<u>Decommissioning:</u>					
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications</li> </ul>					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

### Operational Phase

**Nature of the impact:** Visual impact on residents of homesteads and visitors to tourist accommodation within 5-10 km to the proposed WEF.

**Description of Impact:**

The Khoe Wind Energy Facility could have a very high visual impact on residents of (or visitors to) homesteads and tourist accommodation within a 5 - 10km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	3	4	1	10	5

Operational Phase					
<b>With Mitigation</b>	Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	3	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (88)		Very High Negative Impact (88)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>					
<u>Operations:</u>					
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>					
<u>Decommissioning:</u>					
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications</li> </ul>					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

Operational Phase					
<b>Nature of the impact:</b> Visual impact on observers travelling along roads within 5-10 km to the proposed WEF.					
<b>Description of Impact:</b> Visual impact of the proposed wind turbine structures on observers travelling along roads within 5 – 10km of the proposed WEF					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short distance	Long term	Reversible	High	Definite
<b>Score</b>	3	4	1	8	5
<b>With Mitigation</b>	Short distance	Long term	Reversible	High	Definite
<b>Score</b>	3	4	1	8	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (72)		High Negative Impact (72)		

**Operational Phase**

Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to reduce risk or enhance opportunities: <u>Planning:</u>	
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>	
<u>Operations:</u>	
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>	
<u>Decommissioning:</u>	
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications</li> </ul>	
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.

**Operational Phase**

**Nature of the impact:** Visual impact on residents of homesteads and visitors to tourist accommodation within 10-20 km to the proposed WEF.

**Description of Impact:** The Khoe Wind Energy Facility could have a moderate visual impact on residents of (or visitors to) homesteads/tourist accommodation within a 10 - 20km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	8	4
<b>With Mitigation</b>	Medium distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (56)		Moderate Negative Impact (56)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

### Operational Phase

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact on observers travelling along roads within 10-20 km to the proposed WEF.

**Description of Impact:**

The Khoe Wind Energy Facility could have a moderate visual impact (significance rating = 39) on observers travelling along roads within a 10 - 20km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>With Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Moderate Negative Impact (39)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:



### Operational Phase

- Maintain the general appearance of the facility as a whole.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact on visitors to formally protected areas and private nature reserves within 10-20 km to the proposed WEF.

#### Description of Impact:

The Khoe Wind Energy Facility could have a **moderate** visual impact on visitors/ tourists to the Cape Floral Protected area in the south east (formally protected area a), located within a 10 - 20km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>With Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (45)		Moderate Negative Impact (45)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

#### Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

#### Operations:

- Maintain the general appearance of the facility as a whole.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

### Operational Phase

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact of shadow flicker on sensitive visual receptors in close proximity to the proposed WEF.

**Description of Impact:**

Shadow flicker only occurs when the sky is clear, and when the turbine rotor blades are between the sun and the receptor (i.e. when the sun is low). De Gryse in Scenic Landscape Architecture (2006) found that “most shadow impact is associated with 3-4 times the height of the object”. Based on this research, a 1km buffer along the edge of the outer most turbines were identified as the zone within which there is a risk of shadow flicker occurring.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Moderate	Probable
<b>Score</b>	4	4	1	6	3
<b>With Mitigation</b>	Medium distance	Long term	Reversible	Moderate	Probable
<b>Score</b>	2	4	1	6	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Moderate Negative Impact (48)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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## Operational Phase

**Nature of the impact:** Visual impact of lighting at night on residents and visitors to homesteads and tourist accommodation within 10 km from the proposed WEF

**Description of Impact:** The area immediately surrounding the proposed facility has a relatively low incidence of receptors and light sources, so light trespass and glare from the security and after-hours operational lighting for the facility will have some significance for visual receptors in the study area, especially those located in closer proximity to the wind turbine structures especially within 0-5km and potentially up to 20km.

Another source of glare light, albeit not as intense as flood lighting, is the aircraft warning lights mounted on top of the hub of the wind turbines. These lights are less aggravating due to the toned-down red colour, but have the potential to be visible from a great distance. This is especially true due to the strobing effect of the lights, a function specifically designed to attract the observer's attention. The CAA prescribes these warning lights and the potential to mitigate their visual impacts have traditionally been very low other than to restrict the number of lights to turbines that delineate the outer perimeter of the facility.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short to medium distance	Long term	Reversible	Very High	Definite
<b>Score</b>	3	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	3	4	1	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (88)		High Negative Impact (66)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning & operation:

- Implement needs-based night lighting if considered acceptable by the CAA.
- Limit aircraft warning lights to the turbines on the perimeter according to CAA requirements, thereby reducing the overall impact.
- Shield the sources of light by physical barriers (walls, vegetation, or the structure itself).
- Limit mounting heights of lighting fixtures, or alternatively use foot-lights or bollard level lights.
- Make use of minimum lumen or wattage in fixtures.
- Make use of down-lighters, or shielded fixtures.
- Make use of Low-Pressure Sodium lighting or other types of low impact lighting.
- Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

### Operational Phase

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain
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### Operational Phase

**Nature of the impact:** Visual impact of lighting at night on observers travelling along roads within 10 km from the proposed WEF

**Description of Impact:**

The area immediately surrounding the proposed facility has a relatively low incidence of receptors and light sources, so light trespass and glare from the security and after-hours operational lighting for the facility will have some significance for visual receptors in the study area, especially those located in closer proximity to the wind turbine structures especially within 0-5km and potentially up to 20km. Another source of glare light, albeit not as intense as flood lighting, is the aircraft warning lights mounted on top of the hub of the wind turbines. These lights are less aggravating due to the toned-down red colour, but have the potential to be visible from a great distance. This is especially true due to the strobing effect of the lights, a function specifically designed to attract the observer's attention. The CAA prescribes these warning lights and the potential to mitigate their visual impacts have traditionally been very low other than to restrict the number of lights to turbines that delineate the outer perimeter of the facility.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short to medium distance	Long term	Reversible	High	Definite
<b>Score</b>	3	4	1	8	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	3	4	1	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (78)		Moderate Negative Impact (58)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

**Planning & operation:**

- Implement needs-based night lighting if considered acceptable by the CAA.
- Limit aircraft warning lights to the turbines on the perimeter according to CAA requirements, thereby reducing the overall impact.
- Shield the sources of light by physical barriers (walls, vegetation, or the structure itself).
- Limit mounting heights of lighting fixtures, or alternatively use foot-lights or bollard level lights.
- Make use of minimum lumen or wattage in fixtures.
- Make use of down-lighters, or shielded fixtures.

**Operational Phase**

- Make use of Low-Pressure Sodium lighting or other types of low impact lighting.
- Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain
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**Operational Phase**

**Nature of the impact:** Visual impact of the ancillary infrastructure on observers in close proximity to the structures.

**Description of Impact:**

On-site ancillary infrastructure associated with the WEF includes a 132kV substation and collector substation, BESS, underground cabling between the wind turbines, internal access roads, gate house, Operation and Maintenance buildings. No dedicated viewshed analyses have been generated for the ancillary infrastructure, as the range of visual exposure will fall within (and be overshadowed by) that of the turbines.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	4	4	1	8	4
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Moderate	Probable
<b>Score</b>	4	4	1	6	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (68)		Moderate Negative Impact (48)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the infrastructure.



## Operational Phase

### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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## Operational Phase

**Nature of the impact:** Visual impact of the ancillary infrastructure on observers in close proximity to the structures travelling along the R318.

### Description of Impact:

On-site ancillary infrastructure associated with the WEF includes a 132kV substation and collector substation, BESS, underground cabling between the wind turbines, internal access roads, gate house, Operation and Maintenance buildings. No dedicated viewshed analyses have been generated for the ancillary infrastructure, as the range of visual exposure will fall within (and be overshadowed by) that of the turbines.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	High	Definite
<b>Score</b>	4	4	1	8	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Moderate	Highly Probable
<b>Score</b>	4	4	1	6	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (75)		Moderate Negative Impact (56)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

### Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

### Operations:

- Maintain the general appearance of the infrastructure.

### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

### Operational Phase

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** The potential impact on the sense of place of the region.

**Description of Impact:**

Sense of place refers to a unique experience of an environment by a user, based on his or her cognitive experience of the place. Visual criteria, specifically the visual character of an area (informed by a combination of aspects such as topography, level of development, vegetation, noteworthy features, cultural / historical features, etc.), play a significant role.

An impact on the sense of place is one that alters the visual landscape to such an extent that the user experiences the environment differently, and more specifically, in a less appealing or less positive light.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>With Mitigation</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (82)		Very High Negative Impact (82)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the infrastructure.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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## 10.11 NOISE

Increased noise levels are directly linked with the various activities associated with the construction of the proposed development, as well as the operation phase of the activity. In South Africa the document that addresses the issues concerning environmental noise is SANS 10103. It provides the maximum average ambient noise levels,  $L_{Req,d}$  and  $L_{Req,n}$ , during the day and night respectively to which different types of developments may be exposed. For rural areas the Zone Sound Levels (Rating Levels) are:

- Day (06:00 to 22:00) -  $L_{Req,d} = 45$  dBA, and
- Night (22:00 to 06:00) -  $L_{Req,n} = 35$  dBA.

### 10.11.1 CONSTRUCTION PHASE

There are several factors that determine the audibility, as well as the potential of a noise impact on receptors. Maximum noises generated can be audible over a large distance, however, these maximum noises are generally of very short duration. If noise level exceeds the prevailing ambient sound level with more than 7 dBA, the noise can increase annoyance levels and may ultimately result in noise complaints. Average or equivalent sound levels are another factor that impacts on the ambient sound levels and is the constant sound level that the receptor can experience.

A potential significant source of noise during the construction phase is additional traffic to and from the site, as well as traffic on the site. The use of a borrow pit(s), on site crushing and screening and concrete batching plants will significantly reduce heavy vehicle movement to and from the site. Construction traffic is expected to be generated throughout the entire construction period, expected to take approximately 18 – 24 months, however, the volume and type of traffic generated will be dependent upon the construction activities being conducted, which will vary during the construction period. Noise levels due to traffic can be estimated using various different noise algorithms.

**Impact Phase:** Construction Phase

**Nature of the impact:** Construction activities of access roads

**Description of Impact:** Daytime ambient sound levels could range from less than 20 dBA to more than 75 dBA, averaging at 43.7 dBA (for the six measurement locations). Daytime ambient sound levels are thus typical of a rural noise district. Construction noises might be audible over large distances during quiet periods (during low wind conditions). NSR K-6, K-7, K-8, K-13, K-15 and K-16 (worst-case noise level of 74.5 (K-14) to 34.5 dBA (K-3))

Daytime construction activities should not change the existing rating levels, with this report recommending a daytime noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR in Volume II, Appendix E, Table 2 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Temporary	High	High - Very High	Likely
<b>Score</b>	2	1		8	3



Impact Phase: Construction Phase					
<b>With Mitigation</b>	Local	Temporary	High	High - Very High	Possible
<b>Score</b>	2	1		8	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Low Negative Impact (24)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to enhance opportunities:					
<ul style="list-style-type: none"> <li>The applicant can discuss the potential noise levels with NSR K-6, K-7, K-8, K-13, K-15 and K-16, highlighting the temporary nature of the noise impact; and/or</li> <li>The applicant can plan for construction activities past NSR K-6, K-7, K-8, K-13, K-15 and K-16 when the dwellings are not used for residential purposes (residents at school or working).</li> </ul>					
Residual impact	None				

Impact Phase: Construction Phase					
<b>Nature of the impact:</b> Construction traffic passing NSR					
<b>Description of Impact:</b> Daytime ambient sound levels could range from less than 20 dBA to more than 75 dBA, averaging at 43.7 dBA (for the six measurement locations). Daytime ambient sound levels are thus typical of a rural noise district. Construction noises might be audible over large distances during quiet periods (during low wind conditions). NSR K-7, K-8 and K-15 (worst-case noise level of 54.0 (K-14) to 34.0 dBA (K-3)).					
Daytime construction activities should not change the existing rating levels, with this report recommending a daytime noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR in Volume II, Appendix E, Table 2 and summarized below.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short-term	High	High - Very High	Likely
<b>Score</b>	2	2		8	3
<b>With Mitigation</b>	Local	Short-term	High	High - Very High	Possible
<b>Score</b>	2	2		8	2

Impact Phase: Construction Phase		
Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (42)	Low Negative Impact (28)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to enhance opportunities: <ul style="list-style-type: none"> <li>• The applicant can discuss the potential noise levels with NSR K-7, K-8 and K-15, highlighting the projected worst-case noise levels; and/or</li> <li>• The applicant can plan for activities past NSR K-7, K-8 and K-15 when the dwellings are not used for residential purposes (residents at school or working); and/or</li> <li>• Active noise monitoring during construction activities (noise levels and the opinion of the NSR about the noise level; and/or</li> <li>• The potential temporary relocation of NSR if noise monitoring indicates high annoyance levels with the construction traffic noise levels; and/or</li> <li>• The inclusion of noise as an environmental theme as part of the induction training to employees and contractors, highlighting the potential impact on the identified NSR.</li> </ul>		
Residual impact	None	

**Impact Phase: Construction Phase**

**Nature of the impact:** Numerous simultaneous future construction activities during the day

**Description of Impact:** Daytime ambient sound levels could range from less than 20 dBA to more than 75 dBA, averaging at 43.7 dBA (for the six measurement locations). Daytime ambient sound levels are thus typical of a rural noise district. Construction noises might be audible over large distances during quiet periods (during low wind conditions). All NSR (worst-case noise level of 49.6 (K-14) to 20.7 dBA (K-26)).

Daytime construction activities should not change the existing rating levels, with this report recommending a daytime noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR in Volume II, Appendix E, Table 2 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short term	High	Low (4) or less	Possible
<b>Score</b>	2	2		4	2
<b>With Mitigation</b>	Local	Short term	High	Low (4) or less	Possible
<b>Score</b>	2	2		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		

<b>Impact Phase: Construction Phase</b>	
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (20)      Low Negative Impact (20)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
The potential significance of the noise impact is low and no specific mitigation measures are required for typical daytime construction activities.	
Residual impact	None

<b>Impact Phase: Construction Phase</b>	
<b>Nature of the impact:</b> Numerous simultaneous future construction activities at night	
<b>Description of Impact:</b> Night-time ambient sound levels could range from less than 20 to more than 75 dBA, averaging at 33.1 dBA (for the six measurement locations). Night-time ambient sound levels are typical of a rural noise district and introduced noises could be clearly audible during quiet periods (during no or low wind conditions). NSR K-6, K-7, K-8, K-9, K-10, K11, K-15 and potentially K-12 (worst-case noise level of 49.6 (K-14) to 20.7 dBA (K-26)).	
Night-time construction activities should not change the existing ambient sound levels, with this report recommending a night-time noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR.	
<b>Impact Status:</b> Negative	
	Extent      Duration      Reversibility      Magnitude      Probability
<b>Without Mitigation</b>	Regional      Short Term      High      High - Very High      Likely
<b>Score</b>	3      2           8      3
<b>With Mitigation</b>	Regional      Short Term      High      High      Possible
<b>Score</b>	3      2           8      2
<b>Significance Calculation</b>	<b>Without Mitigation</b> <b>With Mitigation</b>
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (45)      Low Negative Impact (26)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to enhance opportunities:	

**Impact Phase: Construction Phase**

- Plan construction schedule that such simultaneous activities are only required at one WTG location (WTG located within 1,500m from an NSR). Other simultaneous construction activities can continue, but should take place further than 1,500m from NSR;
- Warning NSR of when construction activities may take place at night; and
- Minimise active equipment at night, planning the completion of noisiest activities (such as pile driving, rock breaking and excavation) during the daytime period.

Residual impact	None
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**10.11.2 OPERATIONAL PHASE****Impact Phase: Operation Phase**

**Nature of the impact:** Numerous WTG operating simultaneously at Khoe WEF

**Description of Impact:** WTG will only operate during period with increased winds, when ambient sound levels could be higher than periods with no or low winds. This assessment recommends a daytime upper noise limit of 52 dBA. (worst-case noise level of 47.7 (K-14) to 34.1 dBA (K-17)).

The projected noise levels and the change in ambient sound levels is defined for the identified NSR in Volume II, Appendix E, Table 6 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	High	Low	Possible
<b>Score</b>	2	4		4	2
<b>With Mitigation</b>	Local	Long Term	High	Low	Possible
<b>Score</b>	2	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (20)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

- The potential significance for daytime operational activities is low and additional mitigation are not required or recommended for daytime operational activities

Residual impact	None
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### Impact Phase: Operation Phase

**Nature of the impact:** Numerous WTG operating simultaneously at Khoe WEF

**Description of Impact:** WTG will only operate during period with increased winds, when ambient sound levels could be higher than periods with no or low winds. This assessment recommends a daytime upper noise limit of 52 dBA. Ambient sound levels will likely be higher, with this assessment assuming an ambient sound level of 41.5 dBA (though ambient sound level measurements indicate that actual ambient sound levels may be higher) at a wind speed of 8 m/s (at a height of 10m). NSR K-6, K-7, K-8, K-9, K-10 and K-11 (worst-case noise level of 47.7 (K-14) to 34.1 dBA (K-17)).

The projected noise levels and the change in ambient sound levels is defined for the identified NSR in Volume II, Appendix E, Table 6 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	High	Moderate	Likely
<b>Score</b>	3	4		6	3
<b>With Mitigation</b>	Regional	Long term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Low Negative Impact (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
	<ul style="list-style-type: none"> <li>The use of STE on the blades of the two WTG located closer than 1,000m from NSR K-7, K-8, K-9, K-10 and K-11; or</li> <li>Noise monitoring and the design and implementation of a noise abatement programme (requiring the operation of certain WTG during certain conditions in a reduced noise mode). This however will require the selection of a WTG that offer the use of a reduced noise emission mode.</li> </ul>				
Residual impact	None				

## 10.12 SOCIO-ECONOMIC

### 10.12.1 CONSTRUCTION PHASE

#### POTENTIAL POSITIVE IMPACTS

- Creation of employment and business opportunities, and opportunity for skills development and on-site training.

#### POTENTIAL NEGATIVE IMPACTS

- Impacts associated with the presence of construction workers on local communities.

- Impacts related to the potential influx of jobseekers.
- Increased risks to livestock and farming infrastructure associated with the construction related activities and presence of construction workers on the site.
- Increased risk of grass fires associated with construction related activities.
- Nuisance impacts, such as noise, dust, and safety, associated with construction related activities and vehicles.
- Impact on productive farmland.

**Construction Phase**

**Nature of the impact:** Creation of employment and business opportunities

**Description of Impact:**

The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities that will benefit members from the local communities in the area, including De Doorns and Touws River. These opportunities will include opportunities for low, semi and highly workers. Most of the employment opportunities will accrue to Historically Disadvantaged (HD) members of the community. A percentage of the wage bill will be spent in the local economy which will also create opportunities for local businesses in the local towns in the area. Given relatively high local unemployment levels and limited job opportunities in the area, this will represent a significant, if localised, social benefit. The total wage bill will be in the region of R 30 million (2024 Rand values). A percentage of the wage bill will be spent in the local economy which will also create opportunities for local businesses in the local towns in the area.

**Impact Status:** Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local - Regional	Short Term	n/a	Moderate	Probable
<b>Score</b>	2	2	0	6	3
<b>With Mitigation / Enhancement</b>	Local - Regional	Short Term	n/a	Moderate	Highly probable
<b>Score</b>	3	2	0	6	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Positive Impact (30)		Moderate Positive Impact (44)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

**Employment**

- Preparation and implementation of a Stakeholder Engagement Plan (SEP) prior to and during the construction phase.
- Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, most skilled posts are likely to be filled by people from outside the area.

### Construction Phase

- Where feasible, efforts should be made to employ local contactors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria.
- Before the construction phase commences the proponent should meet with representatives from the LM to establish the existence of a skills database for the area. If such a database exists, it should be made available to the contractors appointed for the construction phase.
- The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that the proponent intends following for the construction phase of the project.
- Where feasible, training and skills development programmes for locals should be initiated prior to the initiation of the construction phase.
- The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.

### Business

- The proponent should liaise with the local municipality with regards the establishment of a database of local companies, specifically BBBEE companies, which qualify as potential service providers (e.g., construction companies, catering companies, waste collection companies, security companies etc.) prior to the commencement of the tender process for construction service providers. These companies should be notified of the tender process and invited to bid for project-related work.

Note that while preference to local employees and companies is recommended, it is recognised that a competitive tender process may not guarantee the employment of local labour for the construction phase.

Residual impact	Improved pool of skills and experience in the local area.
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### Construction Phase

**Nature of the impact:** Potential impacts on family structures and social networks associated with the presence of construction workers

### Description of Impact:

- The presence of construction workers poses a potential risk to family structures and social networks. While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on local communities. The most significant negative impact is associated with the disruption of existing family structures and social networks. This risk is linked to potentially risky behaviour, mainly of male construction workers, including:
  - An increase in alcohol and drug use.
  - An increase in crime levels.
  - The loss of girlfriends and/or wives to construction workers.
  - An increase in teenage and unwanted pregnancies.
  - An increase in prostitution.
  - An increase in sexually transmitted diseases (STDs), including HIV.

Workers are likely to be accommodated in nearby towns of Touws River and De Doorns. As indicated above, the objective will be to source as many of the low and semi-skilled workers locally. These workers will be from the local community and form part of the local family and social networks. This will reduce the risk and mitigate the potential impacts on the local community. However, as indicated above, the availability of suitably qualified workers in the area is likely to be limited. There is therefore likely to be a need to use construction workers from outside the area. Accommodating these workers in Touws River and De Doorns will pose a potential risk to the local community.

### Construction Phase

While the risks associated with construction workers at a community level are likely to be low with mitigation, at an individual and family level they may be significant, especially in the case of contracting a sexually transmitted disease or an unplanned pregnancy. However, given the nature of construction projects, it is not possible to totally avoid these potential impacts at an individual or family level.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Moderate	Probable
<b>Score</b>	2	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Moderate	Probable
<b>Score</b>	1	2	n/a	4	3
<b>Significance Calculation</b>					
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (30)		Low Negative Impact (21)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- The proponent, in consultation with the local municipality should investigate the option of establishing a Monitoring Committee (MC) to monitor and identify potential problems that may arise during the construction phase.
- Preparation and implementation of a SEP prior to and during the construction phase.
- Preparation and implementation of a Community Health, Safety and Security Plan (CHSSP) prior to and during the construction phase.
- The SEP and CHSSP should include a Grievance Mechanism that enables stakeholders to report and resolve incidents.
- Where possible, the proponent should make it a requirement for contractors to implement a 'locals first' policy for construction jobs, specifically for semi and low-skilled job categories.
- The proponent and contractor should develop a Code of Conduct (CoC) for construction workers. The code should identify which types of behaviour and activities are not acceptable. Construction workers in breach of the code should be subject to appropriate disciplinary action and/or dismissed. All dismissals must comply with the South African labour legislation. The CoC should be signed by the proponent and the contractors before the contractors move onto site. The CoC should form part of the CHSSP.
- The proponent and the contractor should implement an HIV/AIDS and Tuberculosis (TB) awareness programme for all construction workers at the outset of the construction phase. The programmes should form part of the CHSSP.
- The contractor should provide transport for workers to and from the site daily. This will enable the contractor to effectively manage and monitor the movement of construction workers on and off the site.
- The contractor must ensure that all construction workers from outside the area are transported back to their place of residence within 2 days for their contract coming to an end.



### Construction Phase

- No construction workers, with the exception of security personnel, should be permitted to stay over-night on the site.

Residual impact	Impacts on family and community relations that may, in some cases, persist for a long period of time. Also, in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community.
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### Construction Phase

**Nature of the impact:** Potential impacts on family structures, social networks and community services associated with the influx of job seekers

#### Description of Impact:

Large construction projects tend to attract people to the area in the hope that they will secure a job, even if it is a temporary job. These job seekers can in turn become "economically stranded" in the area or decide to stay on irrespective of finding a job or not. While the proposed project on its own does not constitute a large construction project, the establishment of several renewable energy projects in the area may attract job seekers to the area. As in the case of construction workers employed on the project, the actual presence of job seekers in the area does not in itself constitute a social impact. However, the way in which they conduct themselves can impact on the local community. The main areas of concern associated with the influx of job seekers include:

- Impacts on existing social networks and community structures.
- Competition for housing, specifically low-cost housing.
- Competition for scarce jobs.
- Increase in incidences of crime.
- These issues are similar to the concerns associated with the presence of construction workers. However, given the location of the project and relatively short duration of the construction phase the potential for economically motivated in-migration and subsequent labour stranding is likely to be negligible. The risks associated with the influx of job seekers are therefore likely to be low.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Low	Probable
<b>Score</b>	2	2	n/a	2	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Low	Probable
<b>Score</b>	1	2	n/a	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (18)		Low Negative Impact (15)		
Was public comment received?	No				

**Construction Phase**

Has public comment been included in mitigation measures?	No
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Mitigation measures reduce residual risk or enhance opportunities:

It is impossible to stop people from coming to the area in search of employment. However, as indicated above, the proponent should ensure that the employment criteria favour residents from the area. In addition:

- Preparation and implementation of a SEP prior to and during the construction phase.
- Preparation and implementation of a CHSSP prior to and during the construction phase.
- Where reasonable and practical, the proponent should implement a "locals first" policy, specifically with regard to unskilled and low skilled opportunities.
- The proponent should implement a policy that no employment will be available at the gate.
- The contractor must ensure that all construction workers from outside the area are transported back to their place of residence within 2 days for their contract coming to an end.

Residual impact	Impacts on family and community relations that may, in some cases, persist for a long period of time. Also, in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community.
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**Construction Phase**

Nature of the impact: Potential risk to safety of farmers and farm workers, livestock and damage to farm infrastructure associated with the presence of construction workers on site.

Description of Impact:

The presence on and movement of construction workers on and off the site poses a potential safety threat to local farmers and farm workers in the vicinity of the site. In addition, farm infrastructure, such as fences and gates, may be damaged and stock losses may result from gates being left open and/or fences being damaged, or stock theft linked either directly or indirectly to the presence of farm workers on the site. Based on feedback from interviews with local landowners, stock theft was identified as a key concern.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Reversible – with compensation	Moderate	Probable
<b>Score</b>	3	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	Reversible – with compensation	Low	Probable
<b>Score</b>	2	2	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (33)		Low Negative Impact (24)		
Was public comment received?	No				

### Construction Phase

Has public comment been included in mitigation measures?

No

Mitigation measures reduce residual risk or enhance opportunities:

- Where reasonable and practical, the proponent should enter into an agreement with the affected local farmers in the area whereby damages to farm property etc. during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- The developer(s) and local farming community should co-ordinate (and if necessary, upgrade) security arrangements, such as establishment of security cameras at strategic locations.
- All farm gates must be closed after passing through.
- Contractors appointed by the proponent should provide daily transport for low and semi-skilled workers to and from the site.
- Where reasonable and practical, the proponent should consider the option of establishing a MC (see above) that includes local farmers and develop a Code of Conduct for construction workers. The MC should be established prior to commencement of the construction phase. The Code of Conduct should be signed by the proponent and the contractors before construction activities commence.
- The proponent should hold contractors liable for compensating farmers and communities in full for any stock losses and/or damage to farm infrastructure that can be linked to construction workers. This should be contained in the Code of Conduct to be signed between the proponent, the contractors, and neighbouring landowners. The agreement should also cover losses and costs associated with fires caused by construction workers or construction related activities (see below).
- The EMPr must outline procedures for managing and storing waste on site, specifically plastic waste that poses a threat to livestock if ingested.
- Contractors appointed by the proponent must ensure that all workers are informed at the outset of the construction phase of the conditions contained in the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.
- Contractors appointed by the proponent must ensure that construction workers who are found guilty of stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation.
- It is recommended that no construction workers, with the exception of security personnel, should be permitted to stay over-night on the site.

Residual impact | No, provided losses are compensated.

### Construction Phase

**Nature of the impact:** Potential noise, dust and safety impacts associated with construction related activities.

**Description of Impact:**

The construction related activities, including the movement of heavy construction vehicles of and on the site, has the potential to create dust, noise and safety impacts and damage roads. The impacts will be largely local and can be effectively mitigated. The number of potentially sensitive social receptors, such as farmsteads, will also be low due to the sparse settlement patterns and small number of farmsteads in the area.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Reversible	Moderate	Probable

Construction Phase					
<b>Score</b>	2	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	n/a	Low	Probable
<b>Score</b>	1	2	n/a	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation / Enhancement</b>	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (30)			Low Negative Impact (15)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The movement of construction vehicles on the site should be confined to agreed access road/s.</li> <li>Establishment of a Grievance Mechanism that provides local farmers and other road users with an effective and efficient mechanism to address issues related to construction related impacts, including damage to local gravel farm roads.</li> <li>The movement of heavy vehicles associated with the construction phase should be timed to avoid times and days of the week, such as weekends, when the volume of traffic travelling along the access roads may be higher.</li> <li>Dust suppression measures should be implemented, such as wetting on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.</li> <li>All vehicles must be road worthy, and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits.</li> </ul>					
Residual impact	If damage to local farm roads is not repaired then this will affect the farming activities in the area and result in higher maintenance costs for vehicles of local farmers and other road users. The costs will be borne by road users who were no responsible for the damage.				

### Construction Phase

**Nature of the impact:** Potential loss of livestock, crops and houses, damage to farm infrastructure and threat to human life associated with increased incidence of grass fires

#### Description of Impact:

The presence of construction workers and construction-related activities on the site poses an increased risk of grass fires that could, in turn pose, a threat to livestock, crops, wildlife and farm infrastructure. The area is susceptible to grass fires during the summer months (October-May).

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Reversible - compensation paid for stock and crop losses etc.	Moderate	Probable
<b>Score</b>	4	2	n/a	6	3

Construction Phase					
<b>With Mitigation / Enhancement</b>	Local	Short Term	n/a	Low	Probable
<b>Score</b>	2	2	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation / Enhancement</b>	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)			Low Negative Impact (24)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- Where reasonable and practical, the proponent should enter into an agreement with the affected local farmers in the area whereby damages to farm property etc., during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- Contractor should ensure that open fires on the site for cooking or heating are not allowed except in designated areas.
- Smoking on site should be confined to designated areas.
- Contractor should ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high-risk dry, windy winter months.
- Contractor should provide adequate fire-fighting equipment on-site, including a fire fighting vehicle.
- Contractor should provide fire-fighting training to selected construction staff.
- No construction staff, with the exception of security staff, to be accommodated on site overnight.
- As per the conditions of the Code of Conduct, in the advent of a fire being caused by construction workers and or construction activities, the appointed contractors should compensate farmers for damage caused to their farms. The contractor should also compensate the fire-fighting costs borne by farmers and local authorities.

Residual impact	No, provided losses are compensated for.
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### Construction Phase

Nature of the impact: The activities associated with the construction phase, such as establishment of access roads and the construction camp, movement of heavy vehicles and preparation of foundations for the project etc. will damage farmlands and result in a loss of farmlands for grazing.

#### Description of Impact:

The activities associated with the construction phase and establishment of the proposed project and associated infrastructure will result in the disturbance and loss of land available for crops and grazing. However, experience from other WEFs is that impact on farming operations can be effectively minimised and mitigated by careful planning in the final layout of the proposed WEF and associated components. The impact on farmland associated with the construction phase can also be mitigated by minimising the footprint of the construction related activities and ensuring that disturbed areas are fully rehabilitated on completion of the construction phase. Recommended mitigation measures are outlined below.

### Construction Phase

The timing / phasing on construction activities should where possible also be planned to avoid and or minimise disruption to farming operations. Affected landowners should be involved in planning of timing of construction activities.

The timing / phasing on construction activities should where possible also be planned to avoid and or minimise disruption to farming operations. Affected landowners should be involved in planning of timing of construction activities.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term-permanent if disturbed areas are not effectively rehabilitated	Reversible	Moderate	Probable
<b>Score</b>	1	5	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short term if damaged areas are rehabilitated	Reversible	Low	Probable
<b>Score</b>	1	2	n/a	2	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- An ECO should be appointed to monitor the construction phase.
- Existing internal roads should be used where possible. In the event that new roads are required, these roads should be rehabilitated on completion of the construction phase.
- The footprint associated with the construction related activities (access roads, construction camps, workshop etc.) should be minimised.
- All areas disturbed by construction related activities, such as access roads on the site, construction camps etc., should be rehabilitated at the end of the construction phase.
- The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s appointed. The specifications for the rehabilitation programme should be included in the EMP.
- The implementation of the Rehabilitation Programme should be monitored by the ECO.

Residual impact	Overall loss of farmland could affect the livelihoods of the affected farmers, their families, and the workers on the farms and their families. However, disturbed areas can be rehabilitated.
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### 10.12.2 OPERATION PHASE

The following key social issues are of relevance to the operational phase:

### POTENTIAL POSITIVE IMPACTS

- The establishment of infrastructure to improve energy security and support renewable sector;
- Creation of employment opportunities;
- Benefits to the affected landowners; and
- Benefits associated with the socio-economic contributions to community development.

### POTENTIAL NEGATIVE IMPACTS

- Visual impacts and associated impacts on sense of place;
- Impact on property values; and
- Impact on tourism.

#### Operation Phase

**Nature of the impact:** Development of infrastructure to improve energy security and support the renewable sector.

#### Description of Impact:

The primary goal of the proposed project is to improve energy security in South Africa by generating additional energy. The proposed WEF also reduces the carbon footprint associated with energy generation. The project should therefore be viewed within the context of the South Africa's current reliance on coal powered energy to meet the majority of its energy needs, and secondly, within the context of the success of the REIPPPP.

#### Improved energy security

South Africa's energy crisis, which started in 2007 and is ongoing, has resulted in widespread rolling blackouts (referred to as load shedding) due to supply shortfalls. The load shedding has had a significant impact on all sectors of the economy and on investor confidence. The mining and manufacturing sector have been severely impacted and will continue to be impacted until such time as there is a reliable supply to energy. Load shedding in the first six months of 2015 was estimated to have cost South African businesses R13.72 billion in lost revenue with an additional R716 million was spent by businesses on backup generators.

Energy expert, Chris Yelland, has estimated the cost of Stage 1 load shedding resulting in 10 hours of blackouts per day for 20 days a month results in losses of R20 billion per month. Based on this Stage 2 load shedding costs the economy R40 billion per month and Stage 3 is estimated to cost the South African economy R80 billion per month.

A survey of 3 984 small business owners found that 44% said that they had been severely affected by load shedding with 85% stating that it had reduced their revenue, with 40% of small businesses losing 20% or more of revenue during due to load shedding period.

#### Impact of a coal powered economy

The Green Jobs study (2011) notes that South Africa has one of the most carbon-intensive economies in the world, thus making the greening of the electricity mix a national imperative. The study notes that renewable energy provides an ideal means for reaching emission reduction targets in a relatively easy manner. In addition, and of specific relevance to South Africa renewable energy is not as dependent on water compared to the massive water requirements of conventional power stations, has a limited footprint and therefore does not impact on large tracts of land, poses limited pollution and health risks, specifically when compared to coal and nuclear energy plants.

The Greenpeace Report (powering the future: Renewable Energy Roll-out in South Africa, 2013), also notes that within a broader context of climate change, coal energy does not only have environmental impacts, it also has socio-economic impacts. These include acid mine drainage from abandoned mines in South Africa and the risk this poses on the country's limited water resources.

## Operation Phase

### Benefits associated with REIPPPP

Through the competitive bidding process, the IPPPP has effectively leveraged rapid, global technology developments and price trends, buying clean energy at lower and lower rates with every bid cycle, resulting in SA getting the benefit of renewable energy at some of the lowest tariffs in the world. The price for wind power has dropped by 50% to R0.94/kWh, while solar PV has dropped with 75% to R1.14/kWh between BW1 and BW4.

Prices contracted under the REIPPPP for all technologies are well below the published REFIT prices. The REIPPPP has effectively translated policy and planning into delivery of clean energy at very competitive prices. As such it is contributing to the national aspirations of secure, affordable energy, lower carbon intensity and a transformed 'green' economy.

**Impact Status:** Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local, Regional and National	Long term	Reversible	High	Highly Probable
<b>Score</b>	4	4	n/a	8	4
<b>With Mitigation / Enhancement</b>	Local, Regional and National	Long term	n/a	High	Definite
<b>Score</b>	4	4	n/a	8	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	High Positive Impact (64)		High Positive Impact (85)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- Implement a skills development and training programme aimed at maximizing the number of employment opportunities for local community members.
- Maximise opportunities for local content, procurement, and community shareholding.

Residual impact	Overall reduction in CO <sub>2</sub> emission, reduction in water consumption for energy generation, contribution to establishing an economically viable commercial renewables generation sector in the Western Cape and South Africa.
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## Operation Phase

**Nature of the impact:** Creation of employment and business opportunities associated with the operational phase



### Operation Phase

#### Description of Impact:

The proposed development will create ~ 20 full-time employment opportunities during the operational phase. Based on similar projects the annual operating budget will be in the region of R 24 million (2023 Rand values), including wages.

#### Impact Status: Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local and Regional	Long term	n/a	Minor	Highly Probable
<b>Score</b>	1	4	n/a	2	4
<b>With Mitigation / Enhancement</b>	Local and Regional	Long term	n/a	Low	Highly Probable
<b>Score</b>	2	4	n/a	4	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Positive Impact (28)		Moderate Positive Impact (40)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

#### Employment

- Where reasonable and practical, the proponent should implement a 'locals first' policy, especially for semi and low-skilled job categories.
- Where feasible, efforts should be made to employ local contactors that are compliant with BBBEE criteria.
- Where feasible, training and skills development programmes for locals should be initiated as part of the operational phase. The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.
- Business
- The proponent should liaise with the LM with regards the establishment of a database of local companies, specifically BBBEE companies, which qualify as potential service providers for the operational phase.
- Note that while preference to local employees and companies is recommended, it is recognised that a competitive tender process may not guarantee the employment of local labour for the operational phase.

Residual impact	Creation of permanent employment and skills development opportunities for members from the local community and creation of additional business and economic opportunities in the area.
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### Operation Phase

**Nature of the impact:** The generation of additional income represents a significant benefit for the local affected farmer(s) and reduces the risks to their livelihoods posed by droughts and fluctuating market prices for sheep and farming inputs, such as feed etc.

### Operation Phase

#### Description of Impact:

The proponent will be required to either purchase the land or enter into a rental agreement with the affected landowners for the use of the land for the establishment of the proposed WEF. Farming operations are impacted by droughts and market fluctuations. Any additional source of income therefore represents a benefit for the affected landowner(s). The additional income would assist to reduce the risks to their livelihoods posed by droughts and fluctuating market prices for outputs and farming inputs, such as fuel, feed etc. The additional income would improve economic security of farming operations, which in turn would improve job security of farm workers and benefit the local economy.

**Impact Status:** Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	Low	Probable
<b>Score</b>	1	4	n/a	4	3
<b>With Mitigation / Enhancement</b>	Local	Long term	Reversible	Moderate	Definite
<b>Score</b>	3	4	n/a	6	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Positive Impact (27)		High Positive Impact (65)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- Implement agreements with affected landowners.

Residual impact	Support for local agricultural sector and farming
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### Impact Phase: Operation Phase

**Nature of the impact:** Benefits associated with support for local community's form SED contributions.

#### Description of Impact:

The REIPPPP has been designed not only to procure energy but has also been structured to contribute to the broader national development objectives of job creation, social upliftment and broadening of economic ownership. Socio-economic development (SED) contributions are an important focus of the REIPPPP and are aimed at ensuring that local communities benefit directly from the investments attracted into the area. These contributions are linked to Community Trusts and accrue over the project operation life and, in so doing, create an opportunity to generate a steady revenue stream over an extended period. This revenue can be used to fund development initiatives in the area and support the local community. The long-term duration of the revenue stream also allows local municipalities and communities to undertake long term planning for the area. The revenue from the proposed WEF can be used to support a number of social and economic initiatives in the area, including:

### Impact Phase: Operation Phase

- Creation of jobs.
- Education.
- Support for and provision of basic services.
- School feeding schemes.
- Training and skills development.
- Support for SMME's.

The minimum compliance threshold for SED contributions is 1% of the revenue with 1.5% the targeted level over the 20-year project operational life. For the current portfolio of projects, the average commitment level is 2.2%, which is 125% higher than the minimum threshold level. To date (across seven bid windows) a total contribution of R23.1 billion has been committed to SED initiatives. Assuming an even, annual revenue spread, the average contribution per year would be R1.2 billion. Of the total commitment, R18.8 billion is specifically allocated for local communities where the IPPs operate. With every new IPP on the grid, revenues and the respective SED contributions will increase.

SED contributions do therefore create opportunities for local rural communities. However, SED contributions can also be mismanaged. This is an issue that will need to be addressed when managing SED investments.

Impact Status: Positive

	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	Local and regional	Long term	Reversible	Low	Probable
Score	2	4	n/a	4	3
With Mitigation / Enhancement	Local and regional	Long term	Reversible	Moderate	Definite
Score	3	4	n/a	6	5
Significance Calculation	Without Mitigation		With Mitigation / Enhancement		
$S=(E+D+R+M)*P$	Moderate Positive Impact (30)		High Positive Impact (65)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- The proponents should liaise with the LM to identify projects that can be supported by SED contributions.
- Clear criteria for identifying and funding community projects and initiatives in the area should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community.
- Strict financial management controls, including annual audits, should be instituted to manage the SED contributions.

Residual impact	Promotion of social and economic development and improvement in the overall well-being of the community.
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### Operational Phase

**Nature of the impact:** The potential impact on the sense of place of the region.

**Description of Impact:**

The operation of the Khoe Wind Energy Facility is expected to have a very high visual impact on observers/visitors residing at homesteads and tourist accommodation facilities within a 5km radius of the wind turbine structures. No mitigation of this impact is possible (i.e. the structures will be visible regardless), but general mitigation and management measures are recommended as best practice.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>With Mitigation / Enhancement</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (82)		Very High Negative Impact (82)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				

Mitigation measures reduce residual risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Potential visual impact based on comments from local landowners

**Operational Phase**

**Description of Impact:**

Visual impact associated with the proposed facility and associated infrastructure and the potential impact on the area’s rural sense of place.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly probable
<b>Score</b>	3	4	n/a	8	4
<b>With Mitigation / Enhancement</b>	Local	Long term	Reversible	High	Highly probable
<b>Score</b>	3	4	n/a	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (60)		High Negative Impact (60)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				

Mitigation measures reduce residual risk or enhance opportunities:

- The recommendations contained in the VIA should also be implemented.
- Install radar activated civil aviation light system.

Residual impact	Potential impact on current rural sense of place.
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**Operational Phase**

**Nature of the impact:** Potential impact on value of visually affected properties

**Description of Impact:**

Potential impact of the WEF on property values

Based on the findings of the literature review the potential impact of WEFs on rural property values is likely to be low, specifically for farms that are farmed as productive farms. However, there are several nature reserves and tourist facilities in the area. The attraction of these areas is linked to the rural character of the area, including the views and vistas. The potential for the proposed WEF to visually impact on a number of these facilities and their associated property values therefore exists. As indicated above, the findings of the VIA (Logis, May 2024) indicate that the visual impact of the Khoe WEF on the areas sense of place will be Very High.

A Tourism Impact Assessment was undertaken by Urban Econ as part of the EIA (Urban Econ, 2024). The study also assessed the potential impact on property and land values in the affected area, including the impact on game farming operations. A detailed literature (international and local) was undertaken as part of the study. The study notes that the review of international literature corroborates the absence of direct linkages between wind farm developments and

## Operational Phase

property prices with various studies confirming that there is no long-term impact of wind farms on property values. Based on the local review, the Urban Econ study notes that in summary, the introduction of wind farm developments did not negatively impact property sales in the specified areas. While farm sales remained stable, there was a noticeable increase in the average sale price. The presence of wind farms did not deter buyers, instead, it may have motivated them, as evidenced by the upward trend in both sales and prices. Overall, there is no clear indication of a negative correlation between wind farm development timing and property sales in this section. Based on the findings of the study the impact of wind farms on local property values during the operational phase was rated as Low Positive (with and without enhancement). Property agents interviewed as part of the study noted that there was an increase in the price of agricultural property linked to the potential to rent out portions to the IPP companies. The same trends continued where wind farms are installed.

However, given the location of the proposed Khoe WEF and proximity of established nature-based tourism activities, the potential impact on property values of the directly affected properties is likely to be Medium Negative. Effective mitigation is not possible. This represents a negative externality for which the owners of these facilities may potentially suffer a financial loss. In the event the Khoe WEF is approved, the developer should liaise with the owners of the directly affected facilities to assess the potential impact of the Khoe WEF on property values and considered the option of compensation. Based on the findings of the SIA the potentially affected properties / establishments include Middelberg Guest Farm, Leeuwenboschfontein Guest Farm, Leeuwenboschfontein, Drie Kuilen Private Nature Reserve, Eximia Private Game Reserve, Langdam Guest Farm, and Porcupine Peak Guest Farm

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	2	4	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	1	4	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Moderate Negative Impact (27)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The recommendations contained in the VIA should also be implemented.</li> <li>The developer of the Khoe WEF should liaise with the owners of the affected operations to assess the potential impact of the WEF on property values and the option of compensation. An independent property valuator should be appointed at the cost of the developer to undertake the assessment.</li> <li>Install radar activated civil aviation light system.</li> </ul>					
Residual impact	Linked to visual impact on sense of place.				

**Impact Phase: Operational Phase**

**Nature of the impact:** Local tourism operations visually impacted by WEF

**Description of Impact:**  
Potential impact of the WEF on tourism operations that are visually impacted

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	2	4	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	1	4	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Low Negative Impact (27)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				

Mitigation measures reduce residual risk or enhance opportunities:

- The recommendations contained in the VIA should be implemented.
- The developer of the Khoe WEF should liaise with the owners of the affected operations to assess the potential impact of the Khoe WEF on future tourism operations and option of some form of compensation if a direct impact can be established.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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**Operational Phase**

**Nature of the impact:** Tourism in the region

**Description of Impact:**  
Potential impact of the WEF on local tourism in the area

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Yes	Minor	Improbable
<b>Score</b>	2	4	n/a	2	2

Operational Phase					
<b>With Mitigation / Enhancement</b>	Local	Long Term	Yes	Minor	Improbable
<b>Score</b>	2	4	n/a	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation / Enhancement</b>	
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (16)			Low Negative impact (16)	
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The recommendations contained in the VIA should be implemented.</li> </ul>					
Residual impact	Linked to visual impact on sense of place.				

### 10.12.3 DECOMMISSIONING PHASE

Decommissioning Phase					
<b>Nature of the impact:</b> Social impacts associated with retrenchment including loss of jobs, and source of income. Decommissioning will also create temporary employment opportunities, which would represent a positive temporary impact.					
<b>Description of Impact:</b> Typically, the major social impacts associated with the decommissioning phase are linked to the loss of jobs and associated income. This has implications for the households who are directly affected, the communities within which they live, and the relevant local authorities. However, in the case of the proposed facility the decommissioning phase is likely to involve the disassembly and replacement of the existing components with more modern technology. This is likely to take place in the 20 - 25 years post commissioning. The decommissioning phase is therefore likely to create additional construction type jobs, as opposed to the jobs losses typically associated with decommissioning. The number of people employed during the operational phase will be in the region of 20. Given the low number of people employed during the operational phase the decommissioning of the facility will not have a significant negative social impact on the local community. The potential impacts associated with the decommissioning phase can also be effectively managed with the implementation of a retrenchment and downscaling programme.					
The decommissioning phase will also create employment opportunities. This will represent a positive impact. These jobs will, however, be temporary.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short term	n/a	Moderate	Probable
<b>Score</b>	4	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short term	n/a	Low	Probable



Decommissioning Phase					
Score	2	2	n/a	4	3
Significance Calculation	Without Mitigation			With Mitigation / Enhancement	
S=(E+D+R+M)*P	Medium Negative Impact (36)			Low Negative Impact (24)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The proponent should ensure that retrenchment packages are provided for all staff retrenched when the plant is decommissioned.</li> <li>All structures and infrastructure associated with the proposed facility should be dismantled and transported off-site on decommissioning.</li> </ul>					
Residual impact	No, provided effective retrenchment package.				

## 10.13 TRAFFIC AND TRANSPORTATION

### 10.13.1 CONSTRUCTION PHASE

#### Impact Phase: Construction

**Nature of the impact:** Increase in general peak hour traffic volumes

**Description of Impact:** Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns.

Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Short Term	Recoverable	Low	Probable
<b>Score</b>	3	2	3	2	3
<b>With Mitigation</b>	Local	Short Term	Reversible	Very Low	Probable
<b>Score</b>	2	2	1	1	3

<b>Impact Phase: Construction</b>		
<b>Significance Calculation</b>	<b>Without Mitigation</b>	<b>With Mitigation / Enhancement</b>
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)	Low Negative Impact (18)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Limit use of private cars</li> <li>• Schedule development traffic movements to not coincide with existing peaks where possible</li> <li>• Encourage use of public/staff transportation</li> </ul>		
Residual impact	Negative, moderate and temporary	

<b>Impact Phase: Construction</b>					
<b>Nature of the impact:</b> Increase in abnormal traffic volumes					
<b>Description of Impact:</b> Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.					
The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	National	Short Term	Recoverable	High	Probable
Score	4	2	3	4	3
With Mitigation / Enhancement	National	Short Term	Recoverable	Moderate	Probable
Score	4	2	3	3	3
Significance Calculation	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		

Impact Phase: Construction	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)      Moderate Negative Impact (36)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)</li> <li>• Transportation scheduling to consider the time of day when the abnormal loads would be moved</li> <li>• Other alternative modes of transportation (rail where feasible) should be considered</li> </ul>	
Residual impact	Negative, moderate and temporary

Impact Phase: Construction					
Nature of the impact: Impact of dust along gravel site access roads					
<b>Description of Impact:</b> Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	1	1	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)		Low Negative Impact (14)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

**Impact Phase: Construction**

Mitigation measures to reduce residual risk or enhance opportunities:

- Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact

Residual impact	Yes, but acceptable.
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**Impact Phase: Construction**

**Nature of the impact:** Deterioration of surrounding road network

**Description of Impact:** Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.

Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	2	2	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)		Low Negative Impact (10)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Limiting the number and frequency of heavy and overloaded vehicles where possible</li> <li>Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions</li> </ul>					
Residual impact	Positive, roads will remain in better conditions post implementation of mitigation measures				

10.13.2 OPERATION PHASE

**Impact Phase: Operation**

**Nature of the impact:** Increase in general peak hour traffic volumes

**Description of Impact:** Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns. Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Reversible	Very Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>With Mitigation</b>	Site	Immediate	Reversible	Very Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (8)		Low Negative Impact (8)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Implementation of the Traffic Management Plan and Road Safety Measures
- Limit use of private cars
- Schedule development traffic movements to not coincide with existing peaks where possible
- Encourage use of public/staff transportation

Residual impact	Moderate and temporary
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**Impact Phase: Operation**

Nature of the impact: Increase in abnormal traffic volumes

### Impact Phase: Operation

Description of Impact: Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.

The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	3	1	3	3	3
<b>With Mitigation</b>	Regional	Immediate	Recoverable	Moderate	Low Probability
<b>Score</b>	3	1	3	3	2
Significance Calculation	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Implementation of the Traffic Management Plan and Road Safety Measures
- Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)
- Transportation scheduling to consider the time of day when the abnormal loads would be moved
- Other alternative modes of transportation (rail where feasible) should be considered

Residual impact	Negative, moderate and temporary
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### Impact Phase: Operation

Nature of the impact: Impact of dust along gravel site access roads

**Impact Phase: Operation**

Description of Impact: Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	Site	Immediate	Recoverable	Low	Low Probability
Score	1	1	3	2	2
With Mitigation	Site	Immediate	Reversible	Very Low	Improbable
Score	1	1	1	1	1
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (10)		Low Negative Impact (4)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact</li> </ul>					
Residual impact	Negligible				

**Impact Phase: Operation**

Nature of the impact: Deterioration of surrounding road network

Description of Impact: Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.

Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.

**Impact Phase: Operation**

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (8)		Low Negative Impact (8)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>Limiting the number and frequency of heavy and overloaded vehicles where possible</li> <li>Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions</li> </ul>					
Residual impact	Positive, roads will remain in better conditions post implementation of mitigation measures				

**10.13.3 DECOMMISSIONING PHASE****Impact Phase: Decommission**

Nature of the impact: Increase in general peak hour traffic volumes

Description of Impact: Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns.

Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.



**Impact Phase: Decommission****Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	Regional	Short Term	Recoverable	Low	Probable
Score	3	2	3	2	3
With Mitigation	Local	Short Term	Reversible	Very Low	Probable
Score	2	2	1	1	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)		Low Negative Impact (18)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Limit use of private cars</li> <li>• Schedule development traffic movements to not coincide with existing peaks where possible</li> <li>• Encourage use of public/staff transportation</li> </ul>					
Residual impact	Negative, moderate and temporary				

**Impact Phase: Decommission**

Nature of the impact: Increase in abnormal traffic volumes

Description of Impact: Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.

The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
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Impact Phase: Decommission					
<b>Without Mitigation</b>	National	Short Term	Recoverable	High	Probable
<b>Score</b>	4	2	3	4	3
<b>With Mitigation</b>	National	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	4	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
S=(E+D+R+M)*P	Moderate Negative Impact (39)		Moderate Negative Impact (36)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)</li> <li>• Transportation scheduling to consider the time of day when the abnormal loads would be moved</li> <li>• Other alternative modes of transportation (rail where feasible) should be considered</li> </ul>					
Residual impact	Negative, moderate and temporary				

Impact Phase: Decommission					
<b>Nature of the impact:</b> Impact of dust along gravel site access roads					
<b>Description of Impact:</b> Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.					
Impact Status: Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	1	1	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability

Impact Phase: Decommission					
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact</li> </ul>					
Residual impact	Yes, but acceptable.				

Impact Phase: Decommission					
Nature of the impact: Deterioration of surrounding road network					
Description of Impact: Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.					
Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.					
Impact Status: Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	2	2	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	

**Impact Phase: Decommission**

<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)	Low Negative Impact (10)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Limiting the number and frequency of heavy and overloaded vehicles where possible</li> <li>• Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions</li> </ul>		
Residual impact	Positive, roads will remain in better conditions post implementation of mitigation measures	

## 11. CUMULATIVE IMPACTS

### 11.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

Note that electrical grid infrastructure projects do not contribute to a loss of agricultural land and are not therefore included in this calculation of cumulative land loss. The area of land taken out of agricultural use as a result of all the projects within a 30 km radius (total generation capacity of 761 MW) will amount to a total of approximately 473 hectares. This is calculated using the industry standards of 2.5 and 0.3 hectares per megawatt for solar and wind energy generation respectively, as per the Department of Environmental Affairs (DEA) Phase 1 Wind and Solar Strategic Environmental Assessment (SEA) (2015). As a proportion of the total area within a 30 km radius (approximately 282,700 ha), this amounts to only 0.17% of the surface area. This is well within an acceptable limit in terms of loss of marginal potential agricultural land.

All the projects contributing to cumulative impact for this assessment have the same agricultural impacts in a very similar agricultural environment, and therefore the same mitigation measures apply to all.

Furthermore, it should be noted that there are few land uses, other than renewable energy, that are competing for agricultural land use in this area. The cumulative impact from developments, other than renewable energy, is therefore likely to be low.

The loss of agricultural potential by soil degradation can effectively be prevented for renewable energy developments by generic mitigation measures that are all inherent in the project engineering and/or are standard, best-practice for construction sites. Soil degradation does not therefore pose a cumulative impact risk.

Due to all the considerations discussed above, the cumulative impact of loss of future agricultural production potential is assessed as low.

### 11.2 FRESHWATER AND WETLANDS (AQUATICS)

The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.

#### Cumulative Impact: Cumulative impacts on the aquatic resources of the area

Nature of impact: The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2

<b>Cumulative Impact: Cumulative impacts on the aquatic resources of the area</b>		
<b>Significance Calculation</b>	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)	Low Negative Impact (14)
Can Impacts be Enhanced?	No	
Mitigation measures to reduce residual risk or enhance opportunities:		
<ul style="list-style-type: none"> <li>The project should share roads and infrastructure where possible to reduce the overall footprint and reduce stormwater and erosion and sedimentation related impacts.</li> <li>The projects should collaborate with provincial roads authority to upgrade the main access routes and improve the crossings and stormwater controls.</li> </ul>		
Residual impact	Low	

### 11.3 TERRESTRIAL BIODIVERSITY

<b>Impact Phase: Cumulative</b>					
<b>Description of the Cumulative Impact:</b> The consideration of five Solar Photovoltaic facilities within 30km of the proposed WEF brings about the potential of changes in broad-scale ecological processes brought on by vegetation clearing.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Long Term	Recoverable	High	Highly Probable
<b>Score</b>	3	4	3	4	4
<b>With Enhancement</b>	Regional	Long term	Recoverable	Moderate	Low Probability
<b>Score</b>	3	4	3	3	2
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (56)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Developers within the area should share baseline data and operational monitoring data to Interested and Affected Parties on a quarterly basis.</li> <li>All mitigations for the proposed development should be strictly adhered to avoid cumulative contributions.</li> </ul>					
Residual impact	Proposed development unlikely to significantly contribute to broad-scale ecological impacts to flora in the area.				

### 11.4 FAUNA

Solar facilities typically involve more invasive vegetation clearing compared to WEFs. Consequently, this can lead to the loss of individual SCC and increased habitat fragmentation. Habitat fragmentation can reduce habitat connectivity and lead to changes in the dispersal of species, population isolation and reduced genetic diversity within landscapes. While the broad-scale impacts on habitat are concerning, it's noteworthy that the Fynbos biome is not listed as critically endangered. However, broad scale clearing of vegetation could lead to cascading effects in flow regimes, nutrient cycling, and energy flow which ultimately results in decreased biodiversity.

**Impact Phase: All**

**Nature of the impact:** Contribution of the proposed development to the cumulative impacts of landcover and land-use to the long-term persistence and viability of animal SCCs in the area

**Impact Status:** Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	High	Highly Probable
<b>Score</b>	3	4	3	4	4
<b>With Mitigation</b>	Regional	Long term	Recoverable	High	Probable
<b>Score</b>	3	4	3	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (56)		Moderate Positive (42)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Implement mitigation measures as detailed above</li> </ul>					
Residual impact	Improvement in habitat connectivity for relevant animal SCCs				

### 11.5 FLORA

Solar facilities typically involve more invasive vegetation clearing compared to WEFs. Consequently, this can lead to the loss of individual SCC and increased habitat fragmentation. Habitat fragmentation can reduce habitat connectivity and lead to changes in the dispersal of species, population isolation and reduced genetic diversity within landscapes. While the broad-scale impacts on habitat are concerning, it's noteworthy that the Fynbos biome is not listed as critically endangered. However, broad scale clearing of vegetation could lead to cascading effects in flow regimes, nutrient cycling, and energy flow which ultimately results in decreased biodiversity.

### Operational Phase

**Description of the Cumulative Impact:** The consideration of five Solar Photovoltaic facilities within 30km of the proposed WEF brings about the potential of changes in broad-scale ecological processes brought on by vegetation clearing.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Long Term	Recoverable	High	Highly Probable
<b>Score</b>	3	4	3	4	4
<b>With Enhancement</b>	Regional	Long term	Recoverable	Moderate	Low Probability
<b>Score</b>	3	4	3	3	2
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (56)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Developers within the area should share baseline data and operational monitoring data to Interested and Affected Parties on a quarterly basis.</li> <li>All mitigations for the proposed development should be strictly adhered to avoid cumulative contributions.</li> </ul>					
Residual impact	Proposed development unlikely to significantly contribute to broad-scale ecological impacts to flora in the area.				

## 11.6 AVIFAUNA

The estimated figure for all avian fatalities is 1,292 birds (all species) from interactions with the one wind farm (Hugo WEF) and four solar farms within 30-km. About 173 of these are expected to be raptors as victims of wind energy facilities. This does not include species that may be displaced from these developments and excludes fatalities due to power line collisions.

These are medium-high totals and suggest cumulative totals must be ranked a medium-high and significant. With CRM- based mitigations (at the Hugo and Khoe WEFs) it is likely that these totals will be lower.

### Impact Phase: Cumulative Phase

**Nature of the impact:** Numerous WTG operating simultaneously from various WEFs in area

**Description of Impact:** Generally negative for birds due to direct fatalities due to collisions with spinning blades. Some species will also avoid the increased disturbance or move away as a result of habitat fragmentation or habitat destruction on site.

**Impact Status:** Negative



Impact Phase: Cumulative Phase					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	High	High	Highly likely
<b>Score</b>	1	4	3	5	5
<b>With Mitigation</b>	Regional	Short term	Low	Moderate	Probable
<b>Score</b>	2	4	4	4	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (85)		High Negative Impact (60)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to enhance opportunities:

- The Hugo wind farm north of Khoe has undertaken the same CRM process of avoidance of high-risk areas undertaken here for KHOE.
- All high-risk zones as delineated by any CRM should be adhered to (as outlined in this report) at both farms.
- Post-construction programmes must be conducted by an avifaunal specialist (following the Birds and Renewable Energy Specialist Group guidelines) to:
  - assess turbine-related fatalities; and
  - confirm that all aspects have been appropriately handled and that road and hard stand verges do not provide additional substrate for raptor prey species. It is essential that the new wind energy facilities do not create favourable conditions for such mammals in high-risk areas.
- A bird fatality threshold and adaptive management policy must be designed by an ornithologist for the site, prior to construction. This policy should form an annexure of the operational EMP for the facility. Most importantly, this policy should identify the number of bird fatalities of Priority species which will trigger an appropriate management response, and timelines for such responses. It is recommended that if 1 RD species or 2 or more LC species be killed per turbine per year then those turbines will require further mitigation.
- Should the identified Priority bird species fatality thresholds be exceeded in Year 1 and 2, either (i) patterned blades to make rotors more visible; or (ii) an observer-led turbine Shutdown on Demand (SDOD) programme (or automated SDOD) must be implemented on site. The human lead programme must consist of a suitably qualified, trained, and resourced team of observers present on site for all daylight hours 365 days of the year. This team must be stationed at vantage points (VPs) with full visible coverage of all turbine locations (typically 1 VP covering four turbines). The observers must detect incoming Priority bird species timeously, track their flights, and when adjudged to have entered a turbine proximity threshold, alert the control room to shut down the relevant turbine. A full detailed method statement or protocol must be designed by an ornithologist.

## 11.7 BATS

The potential cumulative impacts on bats identified at the proposed Khoe WEF:

- Destruction of natural habitat during construction; and
- A reduction in foraging space.

### Cumulative Phase

**Nature of the impact:** Activities associated with construction of solar farms within 30 km combined with the wind farm

**Description of impact:** The destruction of features that could serve as potential roosts, such as rock formations and derelict aardvark holes, and the removal of trees or the fragmentation of woody habitat which includes dense bushes in the surrounding 30 km, together with the construction activities of the wind farm. See Section 8 for a more in dept dis

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Definite
<b>Score</b>	2	3	3	3	5
<b>With Mitigation</b>	Local	Short Term	Recoverable	Low	Probable
<b>Score</b>	2	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (55)			Low Negative Impact (27)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>No clearance of vegetation or construction activities should take place if there is a chance of disturbing a possible bat roost. If there is uncertainty about any feature that could comprise a bat roost, a bat specialist should be contacted.</li> <li>Apart from access roads and the management building, construction activities are to be kept out of all high bat-sensitive areas as far as possible.</li> <li>Rock formations occurring along the ridge lines should be avoided during construction, as these could serve as roosting space for bats.</li> <li>Destruction of limited trees should be avoided during construction.</li> <li>Care should be taken if any dense bushes are destroyed, to make sure that there are not bat roosts in the vegetation. If bat roosts are found, a bat specialist should be contacted immediately.</li> <li>Aardvark holes or any large derelict holes or excavations should not be destroyed before careful examination for bats.</li> <li>The ECO or a responsible appointed person or site manager should contact a bat specialist before construction commences so that they know what to look out for during construction.</li> </ul>					
Residual impact	Yes, natural habitat will be removed, but with rehabilitation a component of this could be replaced.				

## 11.8 HERITAGE AND ARCHAEOLOGY

As with palaeontology, cumulative impacts to archaeological sites and/or materials are difficult to assess, again because of the variable distribution of sites and materials across the landscape and because of the differences in the quality of surveys and reporting on different projects. Field observations made in previous assessments in the vicinity of the Khoe WEF indicate that archaeological sites and materials are not common in the area and that, provided

appropriate mitigation measures are implemented, a low (negative) cumulative impact significance can be expected.

## 11.9 PALEONTOLOGY

Impacts to the cultural landscape are considered to be the main driver of cumulative impacts on heritage resources and could be extensive if multiple projects are constructed in the vicinity, particularly if these projects are highly visible. These cumulative impacts cannot be fully mitigated but the implementation of the recommendations of visual consultants across all projects would likely reduce impacts from high to medium negative if highly sensitive areas are avoided.

## 11.10 VISUAL/LANDSCAPE

### Cumulative Phase

**Nature of the impact:** The potential cumulative visual impact of wind farms on the visual quality of the landscape.

**Description of Impact:**

The study area is not located within a REDZ, and as such very limited renewable energy facilities can be found within a 30 km radius. No other wind energy facilities have been authorized within a 30 km radius; however, three (3) solar PV energy facilities have been approved, namely Sanral PV SEF to the north west and Touws River and Montague Road Solar PV SEFs to the north east.

The proposed Khoe WEF addressed in this report is one half of a larger wind energy cluster consisting of another proposed WEF to the north, namely Hugo wind energy facility.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>With Mitigation</b>	Medium distance	Long term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (85)		Very High Negative Impact (85)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation: N/A					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

### 11.11 NOISE

The potential effect of cumulative noises during the construction phase was considered, evaluating the impact from numerous simultaneous activities taking place at all locations where WTG will be developed. There are no other WEFs within the area of influence and there will not be a cumulative noise impact during the operational phase. The possible significance of the cumulative noise impact is summarized below.

#### Impact Phase: Cumulative Phase

**Nature of the impact:** Numerous WTG operating simultaneously from various WEFs in area

**Description of Impact:** Wind turbines from the Khoe and Hugo WEFs operating simultaneously, though the WTG of these WEFs is too far apart for potential cumulative noises (worst-case noise level of 47.7 (K-14) to 34.1 dBA (K-17)).

The projected noise levels, the potential change in ambient sound levels as well as the potential noise impact is defined per NSR.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>With Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (10)		Low Negative Impact (10)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
<ul style="list-style-type: none"> <li>The potential significance of a cumulative noise impact is low and additional mitigation are not required or recommended.</li> </ul>					
Residual impact	None				

#### Impact Phase: Cumulative Phase

**Nature of the impact:** Numerous WTG operating simultaneously from various WEFs in area

**Description of Impact:** Wind turbines from the Khoe and Hugo WEFs operating simultaneously, though the WTG of these WEFs is too far apart for potential cumulative noises.

The projected noise levels, the potential change in ambient sound levels as well as the potential noise impact is defined per NSR.

**Impact Status:** Negative

Impact Phase: Cumulative Phase					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>With Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (22)		Low Negative Impact (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
<ul style="list-style-type: none"> <li>The potential significance of a cumulative noise impact is low and additional mitigation are not required or recommended.</li> </ul>					
Residual impact	None				

## 11.12 SOCIO-ECONOMIC

### Cumulative Phase

**Nature of the impact:** The potential cumulative visual impact of wind farms on the visual quality of the landscape.

**Description of Impact:** The proposed Khoe WEF is also one half of a larger wind energy cluster consisting of another proposed WEF to the south, namely the Hugo WEF. The cumulative visual impact of the proposed Khoe WEF, together with the proposed Hugo WEF is expected to be Very High, depending on the observer's sensitivity to wind turbine structures. The VIA notes that owing to the sensitivity of the landscape, the high visual quality and the potential visual impacts on sensitive visual receptors, the cumulative visual impact is not considered to be within acceptable limits.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long-term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>With Mitigation</b>	Medium distance	Long-term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		

Cumulative Phase	
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (85) Very High Negative Impact (85)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to enhance opportunities:	
N/A	
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed, and the area rehabilitated. Failing this, the visual impact will remain.

Cumulative Phase					
<b>Nature of the impact:</b> Cumulative Phase local services					
<b>Description of Impact:</b> The establishment of a number of renewable energy facilities and associated projects, such as the proposed WEF, in the BVM and LM has the potential to place pressure on local services, specifically medical, education and accommodation.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long-term	Reversible	Low	Probable
<b>Score</b>	1	4	n/a	4	3
<b>With Mitigation</b>	Local and regional	Long-term	Reversible	Low	Probable
<b>Score</b>	2	4	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (27)		Moderate Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to enhance opportunities:					
The proponent should liaise with the LM to address potential impacts on accommodation and local services.					

### Cumulative Phase

Cumulative Phase

**Nature of the impact:** Cumulative Phase local Economy

**Description of Impact:** The establishment of a number of renewable energy facilities and associated projects, such as the proposed WEF, in the BVM and LM has the potential to place pressure on local services, specifically medical, education and accommodation.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	Low	Highly Probable
<b>Score</b>	1	4	N/A	4	4
<b>With Mitigation</b>	Local and regional	Long term	Reversible	High	Highly Probable
<b>Score</b>	3	4	N/A	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Positive Impact (36)		High Positive Impact (60)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to enhance opportunities:

The proposed establishment of suitably sited renewable energy facilities and associated projects, such as the proposed WEF, within the LM should be supported.

## 11.13 TRAFFIC AND TRANSPORTATION

### Cumulative Impact: Increase in general peak hour traffic volumes

**Description of Cumulative Impact:** Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns.

Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Cumulative Impact: Increase in general peak hour traffic volumes****Impact Status:** Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Short Term	Recoverable	Probable	Probable
<b>Score</b>	3	2	3	3	3
<b>With Enhancement</b>	Local	Short Term	Recoverable	Probable	Probable
<b>Score</b>	2	2	3	3	3
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (33)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
<b>Enhancement:</b> <ul style="list-style-type: none"> <li>Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>Limit use of private cars</li> <li>Schedule development traffic movements to not coincide with existing peaks where possible</li> <li>Encourage use of public/staff transportation</li> </ul>					
Residual impact	Negative to Significant				

**Cumulative Impact: Increase in abnormal traffic volumes**

Description of Cumulative Impact: Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.

The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.

**Impact Status:** Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Short Term	Recoverable	High	Highly Probable
<b>Score</b>	4	2	3	4	4



**Cumulative Impact: Increase in abnormal traffic volumes**

<b>With Enhancement</b>	Regional	Short Term	Recoverable	Probable	Probable
<b>Score</b>	3	2	3	3	3
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Moderate Negative Impact (33)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Enhancement:	<ul style="list-style-type: none"> <li>Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)</li> <li>Transportation scheduling to consider the time of day when the abnormal loads would be moved</li> <li>Other alternative modes of transportation (rail where feasible) should be considered</li> </ul>				
Residual impact	Negative to Very Significant				

**Cumulative Impact: Impact of dust along gravel site access roads**

Description of Cumulative Impact: Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.

Impact Status: Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Site	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	1	1	3	3	3
<b>With Enhancement</b>	Site	Immediate	Recoverable	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)		Low Negative Impact (10)		

**Cumulative Impact: Impact of dust along gravel site access roads**

Was public comment received?	No
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Has public comment been included in mitigation measures?	No
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**Enhancement:**

- Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact

Residual impact	Negligible
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**Cumulative Impact: Deterioration of surrounding road network**

**Description of Cumulative Impact:** Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.

Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.

**Impact Status:** Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
Without Enhancement	Regional	Short Term	Recoverable	Moderate	Probable
Score	1	1	3	4	3
With Enhancement	Local	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	1	2	3	3

**Significance Calculation****Without Enhancement****With Enhancement****S=(E+D+R+M)\*P**

Low Negative Impact (27)

Low Negative Impact (21)

Was public comment received?	No
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Has public comment been included in mitigation measures?	No
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**Enhancement:**

- Limiting the number and frequency of heavy and overloaded vehicles where possible
- Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions

## 12. SUMMARY OF FINDINGS, RECOMMENDATIONS AND CONCLUSION

### 12.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

The site is in an area where there is limited crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore limiting to rain-fed cropping. The dominant soils are shallow soils on underlying weathered bedrock of the Glenrosa, Hutton, Swartland, and Mispah soil forms. There is a high proportion of rock outcrops. The soils are limited in their agricultural potential by shallow depths, rockiness, and low water holding capacity and are unsuitable for crop production as a result, except in some lower-lying areas where accumulation leads to deeper soils, and limited cropping is practised.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In the case of wind farms, the amount of land excluded from agriculture is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has. Furthermore, wind farms have both positive and negative effects on the production potential of land, and it is the net sum of these positive and negative effects that determines the extent of the change in future production potential.

From an agricultural impact point of view, it **is recommended that the proposed development be approved.**

### 12.2 FRESHWATER AND WETLANDS (AQUATICS)

It was determined that the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. The loss of irreplaceable aquatic habitat and/or important biota is highly unlikely, i.e. Very High sensitivity or No-Go areas. This also includes the spanning of a functioning drainage line, which would not be seen as problematic, if suitable stormwater management and drainage from the area of the site is provided. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

None of the proposed project alternatives (buildings) have a direct impact on the aquatic environment, making use of the existing provincial / district road network thus either option is deemed acceptable.

The significant impacts are associated with the access road crossings river systems. These systems are generally in a modified state, but still provide some habitat and important ecological functions.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

**The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.** None of the proposed project

alternatives (buildings) have a direct impact on the aquatic environment, making use of the existing provincial / district road network thus either option is deemed acceptable.

### 12.3 TERRESTRIAL BIODIVERSITY

The sensitivities presented in this assessment have been refined following the prescribed detailed site survey. The Sensitivities provided by the DFFE Online ST are a useful guideline, and the site's sensitivity has been verified against the EIA layout. The data collected to date suggests that the negative impacts to terrestrial biodiversity posed by the proposed development range from Moderate to Low with adherence to the recommended mitigation measures. Some mitigation measures involve avoiding highly sensitive areas, implementing ongoing biodiversity monitoring plans for various specialisms and to continuously adapt the EMPr throughout the development's operational lifecycle.

Mitigation recommendations are standard for wind energy developments, and provided these and considerations presented in the Terrestrial Biodiversity Specialist Assessment are met, the development of the Khoe WEF will be compatible with conservation efforts in the area. For spatial planning purposes it is recommended that wind turbines be preferentially placed within modified and / or disturbed areas of cultivated lands.

**It is the Specialist's opinion that the proposed Khoe WEF be considered for environmental authorization, provided all mitigation measures are adhered to.**

### 12.4 FAUNAL

Two non-avian SCCs were identified as relevant sensitivity features in the animal species theme output of the Screening Tool, namely the Least Concern Caledon Copper (*Aloeideas caledoni*, a butterfly) and Critically Endangered Riverine Rabbit (*Bunolagus monticularis*), both listed as 'Medium' sensitivity indicating the potential to occur on the study site. Two additional non-avian animal SCCs were determined relevant to the proposed development, namely the Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*).

A camera trap survey was conducted at 11 sampling locations (two on-site and nine off-site) in and around the proposed development area between 17 February 2022 and 23 December 2022, resulting in 1,832 camera trap days. A total of 2,778 independent records of 3,269 animals representing 66 species were recorded across the broader area. No Riverine Rabbit were recorded present on the Khoe WEF site, but were regularly recorded during simultaneous monitoring in the broader area. Grey Rhebok were confirmed on site and while Caledon Copper and Leopard were not confirmed on site, both were assumed to be present for the purposes of the assessment.

The animal sensitivity of the site was mapped through consideration of existing impacts, potential impacts of the proposed development and important ecological processes that should be acting across the site and broader area. Conservation objectives for all animal SCCs relevant to the project highlight the importance of dispersal corridors across the landscape to maintain genetic diversity and long-term studies on population dynamic. Agricultural activity across the site has modified the majority of preferred Riverine Rabbit habitat and obstructed potential animal movement corridors. The proposed development presents an opportunity to provide a land-use alternative to agricultural activity that is more compatible with conservation objectives for animal SCCs. Impacts can be minimized through in-situ biodiversity

rehabilitation, specifically through the restoration of strategic, currently modified areas to improve habitat connectivity for animal SCCs relative to the present condition.

The **proposed development is acceptable from an animal perspective** on condition that strategic areas of existing agricultural land be appropriately rehabilitated.

## 12.5 FLORA

The site is classified as High Sensitivity with areas characterized as Medium and Low Sensitivity by the DFFE Online Screening Tool (ST). Up to 1,782 plant species are potentially present on site, of which 48 are listed as SCC by the DFFE Online ST. Given the high number of species potentially present it is likely the number of SCC is greater than that provided by the DFFE Online ST. The proposed development area includes three vegetation types that are listed as LC by the RLE, and intersects in some areas with CBA and ESA.

The anticipated impacts include vegetation clearing, loss of individual SCC, alien invasive species, soil erosion, chemical contamination, and fire. Cumulative impacts include those that affect broad-scale ecological processes and conservation objectives. With adherence to the prescribed mitigation measures opportunities exist to promote conservation efforts, community engagement and education, and local environmental monitoring and research.

It is the Specialists opinion that SCC are likely present on site, therefore the DFFE Online ST Assessment of High Sensitivity in the Plant Species Theme for some areas is accurate. High sensitivity areas are predominantly those listed as CBAs. All other areas are either Medium Sensitivity or Low Sensitivity.

**It is the Specialists opinion that the proposed Khoe WEF may be considered for development, provided all mitigation measures are adhered to.**

## 12.6 AVIFAUNA

The Collision Risk Modelling allowed a fine-tuned assessment of not only the Passage Rates, but flight heights, the placement of turbines, and a more precise spatially explicit flight risk assessment to all seven Priority species. It gave eight levels of risk (from 1, the lowest, to 7.5, the highest) and we examined the data (lumped together, and for individual species like Verreaux's Eagle) to determine where the number of risky-flight minutes could be minimised in relation to areas.

The resulting identification of risk across spatially explicit areas indicated the north-eastern and central areas were high risk for Red Data species and the central and northern areas were high risk for Least Concern species. This resulted in 66.6% of the area designated for Khoe Wind Energy Facility as No-Go for turbines. Of the 29 proposed turbines, all avoid the riskiest areas predicted by the CRM. Note that some of them fall within the 3.7 km Verreaux's Eagle circular nest buffer, but no risk areas were identified for eagles within the sliver of the buffer inside the south-west boundary. For this reason, we favoured the CRM results as more precise than the coarse buffer approach.

Birds & Bats Unlimited concur with the DFFE Screening Tool Assessment that classified the Khoe area as of High Sensitivity.

According to available information collected during this study and based on the CRM-optimised layout for each of the 29 turbines proposed for the Khoe Wind Energy Facility, all high-risk areas for birds have been avoided.

According to available information consulted during this study to date, **there are no fatal flaws (assuming all mitigation measures will be implemented) from an avifaunal sensitivity perspective which should prevent the wind farm from proceeding.**

## 12.7 BATS

Data from passive monitoring systems, fieldwork sessions, roost surveys, and a desktop study informed this report. Six static SM4BAT systems were deployed within the project site, with four systems located near-ground at 10 m, to represent the various biotopes, and two on the met mast, within the sweep of the turbine blades, at 50 m and 100 m.

Of the 12 species with distribution ranges that include the proposed development area, three have a conservation status of Near Threatened in South Africa and one Vulnerable, while two have a global conservation status of Near Threatened. According to the likelihood of fatality risk, as indicated by the latest pre-construction bat guidelines six species, namely Natal long-fingered bat, Egyptian free-tailed bat, Roberts's flat-headed bat, Cape roof bat and the two fruit bats have a high risk of fatality, while Temminck's myotis bat has a medium-high risk and the endemic Long-tailed house bat has a medium risk of fatality.

Passive monitoring data for the period between 30 December 2022 and 7 March 2024 is included in this report. *L. capensis* was the most abundant species recorded (55%), while 37% of the calls were of those bats like the high-flying Egyptian free-tailed bat, which has a narrow wing morphology adapted for open air space. 4% of the activity recorded was similar to Natal long-fingered bat, 3% was Roberts's flat-headed bat, and a statistically insignificant number of the endemic Long-tailed house bat.

The average monthly activity shows that bats are generally most active during the summer months, followed by autumn and spring, with reduced activity during the winter months. Peak activity was recorded in March, November and December 2023, with general high activity from February to May 2023, and again from October 2023.

Due to the general high bat activity on site, the development areas were classified as medium sensitive. It will therefore be necessary to mitigate turbines early in the operational phase. No turbine components are allowed in high-sensitivity zones. At present no turbines are positioned in medium-high sensitivity zones either, but if turbines are placed on medium-high sensitivity zones, curtailment will have to be applied after the testing of those turbines, when they start to turn.

The overall potential negative impact of the proposed Khoe WEF on bats, combined for all the development phases, is predicted to be moderate negative without mitigation, while low negative with mitigation.

Based on the findings of the 14 months of pre-construction bat monitoring undertaken at the proposed Khoe WEF project site, the bat specialist is of the opinion that no fatal flaws exist which would prevent the construction and operation of this wind farm, but bat activity is high, and mitigation measures should be adhered to. **The EA may be granted, subject to the implementation of the recommended mitigation measures.**

## 12.8 HERITAGE AND ARCHAEOLOGY

This assessment has found that the area identified for the proposed Khoe WEF is a heritage environment of variable sensitivity but that significant impacts on palaeontological and archaeological resources arising from the project are unlikely and no fatal flaws have been identified. Impacts to the cultural landscape are expected to be significant, but these can be reduced through the implementation of suitable mitigatory measures. If the project were not implemented, the site would stay as it currently is with a neutral impact significance.

Despite the impacts to the cultural landscape, it is expected that mitigation measures will allow impacts to be managed.

**It is our considered opinion, therefore, that the proposed Khoe WEF may be authorised, but subject to the recommendations contained within this report.**

## 12.9 PALEONTOLOGY

According to SAHRA's palaeo-sensitivity map, the Khoe WEF footprint is in an area of generally very high or high palaeontological sensitivity. However, a palaeontological assessment for the adjacent proposed Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual palaeontological sensitivity of that project area is much lower than indicated on the SAHRA map.

The PIA makes the following recommendation:

- Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. There is a moderate to small chance that fossils may occur in the mudstones, of the Ceres Subgroup that lie below the soils or in rocky outcrops.
- Therefore, a Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the environmental officer, or other responsible person once excavations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach. It should be noted that soil cover is likely to obscure any fossils.

**Considering the impacts that were assessed, there is no objection to the authorisation of this project,** assuming all mitigations/recommendations and buffer zones are implemented.

## 12.10 VISUAL/LANDSCAPE

Overall, the significance of the visual impacts associated with the proposed Khoe Wind Energy Facility is expected to be very high to high as a result of the generally undeveloped character of the landscape and its inability to absorb changes of this magnitude. Additionally, the facility would be visible within an area that contains certain sensitive visual receptors who already consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors include people travelling along the R318 and secondary roads, as well as, residents of rural homesteads and tourists passing through or holidaying in the region.

Night time impacts have also been assessed whereby it was determined that the significance of lighting (particularly aircraft warning lighting mounted on the turbines) on the nightscape

would be high post mitigation. As discussed, the greater environment is largely natural in character with limited built infrastructure. Unblemished night skies are a key attribute to the study areas sense of place and night time visual character. Light sources in the area are limited to isolated farm and homesteads and fleeting light from passing cars travelling along the R318 and other secondary roads. Therefore, the introduction of new light sources into a relatively dark night sky, will have an impact on the visual quality of the study area at night.

According to the Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning (DEA&DP) Guideline for Involving Visual and Aesthetic Specialists in the EIA Process (Oberholzer, 2005), the criteria that determine whether or not a visual impact constitutes a potential fatal flaw are categorised as follows:

1. Non-compliance with Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites.
2. Non-compliance with conditions of existing Records of Decision.
3. Impacts that may be evaluated to be of high significance and that are considered by the majority of the stakeholders and decision-makers to be unacceptable.

In terms of the above and to the knowledge of the author, the proposed development is compliant with all Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites, as well as, conditions of existing Records of Decisions. However, it must be noted that as per the *Guideline for the Management of Development on Mountains, Hills and Ridges of the Western Cape (April 2002)*, development on the crest of a mountain, hill or ridge will be strongly discouraged. Of the 38 turbines proposed, 28 are located on mountains and tall hills identified as having a high visual sensitivity and where development in these buffers is not considered best practice and should be avoided. Owing to the extremely close proximity of sensitive visual receptors to the proposed Khoe WEF, turbines placed on elevated terrain, such as mountains and tall hills, exacerbate the already very high visual impact on these receptors. As such, turbines placed on these areas will not be supported.

Furthermore, with regards to point 3 above, it has been established through the course of this assessment that many objections to the proposed Khoe WEF have been raised by stakeholders within the region, as communicated by the EAP and social impact specialist. Based on the objections received and the overall lack of support for wind energy facilities in the region, the author is of the opinion that the overall very high to high significance of the visual impacts anticipated for the proposed Khoe WEF are considered by the majority of the stakeholders and decision-makers to be unacceptable and that the statistical majority of objecting stakeholders has been exceeded. If evidence to the contrary surfaces during the progression of the development application, the specialist reserves the right to revise the statement below.

In light of the above assessment and the outcomes determined thereof, the author is of the opinion that the visual impacts associated with **the proposed Khoe Wind Energy Facility has exceeded acceptable limits and is considered fatally flawed from a visual perspective.** The author therefore does not support the authorisation of this project owing to the following:

- The overall very high to high visual impacts;
- The very high cumulative impact;
- Majority of the turbines are located on mountain and tall hills rated as having a high sensitivity;



- Majority of the stakeholders are against the project;
- The proposed Khoe WEF is located in significant proximity to sizeable established and planned tourism operations;
- Turbines are located within the buffer zones of protected areas and private nature reserves; and

The proposed Khoe WEF will result in significant loss of sense of place and uniqueness of landscape character.

### **EAP Motivation**

According to the visual assessment, landowners/receptors and travelers may view the turbines in a negative light, for others, wind turbines are not regarded as visually intrusive. The perception of what constitutes a negative visual impact is therefore personal and subjective. We have considered the responses from all Interested and Affected Parties (I&APs). In response, detailed simulations and visualisations were undertaken from various guesthouses to understand and address potential visual impacts. Adjustments to turbine placement was made based on the outcome of the visual impact assessment. Despite these efforts, some opposition persists.

The turbines located in high sensitivity areas are positioned there to take advantage of the optimal wind resource. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition.

I would also like to highlight the proposed Exemia game reserve (where the objections persist). Currently, the proposed campsite area remains undeveloped, and no concrete plans have been provided, so it is considered a future intent project.

Although the wind farm's visual impact on residents and tourism is high, the decision to proceed with its development is motivated by its considerable environmental and economic benefits. The project will contribute to the aforementioned frameworks, Western Cape Green Economy Strategy and Just Energy Transition and this transition is important to the country and to the future growth and sustainability as an organisation.

The establishment of the Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth. The nearest rural community is approximately 7.5 km from the proposed wind farm site. The development of the wind farm is expected to boost the local economy by creating job opportunities and supporting local businesses.

Additionally, traffic mitigation measures will be enforced to minimize disruptions for local residents and tourism activities, ensuring that the overall benefits of the wind farm outweigh the challenges.

### **12.11 NOISE**

This study considers the potential noise impact on the surrounding environment due to the proposed development, operation and decommissioning of the Khoe WEF (and associated infrastructure) north of Robertson in Western Cape Province. It is based on a predictive model to estimate potential noise levels due to the various activities and to assist in the identification of potential issues of concern.

It was determined that the potential noise impacts, without mitigation, would be:

- of a medium significance for the daytime construction of the access roads (access roads are far from verified NSR). While this significance may be due to the strict EIA criteria considered, mitigation measures are available that could reduce this significance to low;
- of a medium significance for the daytime construction traffic passing NSR (access roads are far from verified NSR). While this significance may be due to the strict EIA criteria considered, mitigation measures are available that could reduce this significance to low;
- of a low significance for the daytime construction activities (hard standing areas, excavation and concreting of foundations and the erecting of the WTG and other infrastructure) at the Khoe WEF;
- of a medium significance for the night-time construction activities (such as the pouring of concrete, erecting the WTG) at the Khoe WEF. Mitigation is available to reduce the significance of the noise impact to low;
- of a low significance for the daytime operational activities at the Khoe WEF;
- of a medium significance for operational activities (noises from wind turbines) at the Khoe WEF when considering the worst-case PWL. Mitigation measures are available and were recommended that would reduce this significance to low.

There is no potential for a cumulative noise impact.

The proposed layout (turbine placement) is considered acceptable from a noise perspective (subject total noise levels are less than 45 dBA at all NSR locations used for residential purposes). There is no restriction in the WTG that the applicant could use, though the applicant must monitor noise levels, the response of receptors to the noise levels and ensure that night-time noise levels are less than 45 dBA at all receptors (structures used for permanent residential purposes). Subject to this condition, **it is recommended that the proposed Khoe WEF (and associated infrastructure) be authorized.**

It should be noted that the applicant should re-evaluate the noise impact should:

- the layout be revised (as part of amendment process post EA) where any WTG, located within 2,500 m from a confirmed NSR, are moved closer to the NSR;
- the layout be revised (as part of amendment process post EA) where any new WTG are introduced within 2,500m from an NSR;
- the layout be revised (as part of amendment process post EA) where the number of WTG within 2,500m from an NSR are increased; and
- the applicant selects to use a WTG with a higher SPL than the WTG assessed in this report.

The applicant should also develop and implement an environmental noise monitoring programme at selected NSR living within the 42 dBA noise contour.

It is proposed that the applicant recommend to landowners that:

- no new residential dwellings be developed within areas enveloped by the 42 dBA noise level contour, and
- structures located within the 45 dBA noise level contour should not be used for permanent residential purposes.

## 12.12 SOCIO-ECONOMIC

The findings of the Social Impact Assessment (SIA) indicate that proposed Khoe WEF project will create several social and socio-economic benefits, including creation of employment and business opportunities during both the construction and operational phase. In addition, the WEF will generate renewable energy that will improve energy security in South Africa and contribute towards reducing the countries carbon footprint. However, the benefits associated with the WEF are not site dependent and would also be associated with an alternative site.

Based on the findings of the VIA, the Khoe WEF will have a very high negative impact on the areas sense of place. The cumulative impacts on the area's sense of place will also be very high negative. Effective mitigation is not possible. Based on this finding the visual impacts associated with the proposed Khoe WEF exceed acceptable limits and are considered as a fatal flaw from a visual perspective. The development of the Khoe WEF is therefore not supported by the VIA. The findings of the SIA support the findings of the VIA. Given the areas visual sensitivity and number of established nature reserves and associated eco-tourism facilities, the Khoe WEF is located in an area that is not regarded as suitable for the establishment of a large-scale wind energy facility.

Based on the findings of the SIA the development of the proposed Khoe WEF is not supported. The suitability of establishing large WEFs, including the proposed Khoe WEF, in the area to the south of the N1 is questioned. The development of renewable energy facilities in the area to the south of the N1 represents a spillover from the Komsberg REDZ located to the north of the N1. From a long-term planning perspective this not ideal, specifically given the environmental and scenic qualities of the area. In this regard the Western Cape Provincial Spatial Development Framework highlights the importance to the Province's landscape and scenic assets and threat posed by large scale infrastructural developments such as wind farms. The Langeberg Spatial Development Framework also identifies the R318 as scenic route highlights the importance of:

- Preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture.
- Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction.
- Promoting tourism to develop sensitively and contribute to the protection of the landscape and heritage landscape.

It is also important to note that the benefits associated with the WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.

### **EAP MOTIVATION**

As mentioned above, the Western Cape Provincial Development Framework Western Cape's cultural and scenic landscapes are significant assets that underpin the tourism economy, however according to the key Provincial climate change challenge, the plan is to devise and introduce effective adaptation and mitigation responses, especially for vulnerable municipalities. One of the focus areas for mitigation is renewable energy, which is directly applicable to this Project application. Support emergent Independent Power Producers (IPPs)

and sustainable energy producers (wind, solar, biomass and waste conversion initiatives) in suitable rural locations.

Furthermore, with load shedding costing South Africa's economy R500 million per stage, per day and the Western Cape's economy R75 million per stage (according to BusinessTech 2021), the country's energy crisis, needs large-scale private sector participation, in partnership with government. This will be key in addressing the current shortfall in the Western Cape.

To accelerate the decarbonisation of South Africa's economy and support economic growth, government from South Africa, France, Germany, the United Kingdom and the United States, along with the European Union announced a long-term Just Energy Transition Partnership in November 2022.

The Western Cape Climate Change Response Strategy (WCCCRS) was adopted in February 2014. The strategy is an update of the 2008 Western Cape Climate Change Response Strategy and Action Plan. The key difference with the 2008 Strategy is a greater emphasis on mitigation, including strategically suitable renewable energy development. The development of the WEF will contribute to national and global efforts to significantly reduce Green House Gas (GHG) emissions and build a sustainable low carbon economy, which simultaneously addresses the need for economic growth, job creation and improving socio-economic conditions.

Given the aforementioned framework and the Western Cape Green Economy Strategy, the establishment of this Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth.

The developer has taken into account the visual impact findings and has revised the layout multiple times to minimize visual impacts. However, the specific turbines which are located in high sensitivity areas are positioned there to take advantage of the optimal wind potential. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition, bearing in mind that this transition is important to the country and to the future growth of the renewables sector.

### 12.13 TRAFFIC AND TRANSPORTATION

The proposed development and final layout can be supported from a traffic engineering point of view. The base year and forecast year road capacity has indicated that the proposed development will have little to no significant impact on the existing road network capacity and intersection operational performance. Given the findings of this report, it is recommended that the proposed development be considered favourably from a traffic engineering point of view as the intended construction will have no significant negative impact on the surrounding road network. **The project can be considered for environmental authorisation.**

The following recommendations are made:

- A comprehensive route assessment of the entire transportation route to verify clearance, load bearing and sweeping radius distances is recommended.
- The main access to the development is proposed approximately 1.6 km east of the existing Main Road R319/DR01428 intersection. This is essentially the alternative location of the associated WEF facility infrastructure based on safety considerations and mitigation measures outlined in the report.

- It is recommended that the access points be priority controlled and widened to allow for acceleration lane and dedicated right turn lane off the main road, which will incorporate the turning characteristics of the expected abnormal vehicles.
- Clearance permits will be required for the transport of the WT components.
- It is recommended that applications for Abnormal Permits be lodged to the Department of Transport and Public Works, Eskom, and Telkom (where affected) at the time of construction.

## 13. IMPACT STATEMENT

### 13.1 CONDITIONS TO BE INCLUDED IN THE ENVIRONMENTAL AUTHORIZATION

#### 13.1.1 AQUATIC

- Any of the activities, should also be monitored by the appointed EO/ECO on a daily basis, especially during periods of river flow during construction.
- Any points of erosion should be stabilised immediately (sand bags in the short term) using gabions and reno mattress as required. No activities should take place outside of the demarcated servitude, to prevent additional cumulative impacts on these systems.
- The EMP<sub>r</sub>, must include a Construction Specific Monitoring and Rehabilitation Plan related to the water course and wetland crossings, and specifically to the prevention of erosion and sedimentation as these systems are prone to scour, with rehabilitation options being limited due to the sparse nature of the vegetation.
- Monitoring should occur on a monthly basis for 6 months post construction and where any unstable soils occur, these must be protected with temporary stabilisation dependent on the scale of the impact i.e. sand bags - hay bales) until areas become revegetated. If any areas require permanent erosion protection (e.g. gabions or stone pitching) then the WULA/GA must be amended to include these areas.

#### 13.1.2 BATS

- The final layout must be informed by the sensitivity map provided in Section 6. 10 of the main report.
- A bat specialist must be appointed before the commercial operation date. Mitigation measures, must form part of the operational EMP<sub>r</sub>, and be applied as directed.
- Turbines must be feathered below cut-in speed, and although they need not be at a complete standstill, there should be minimum movement so that bats are not at risk when turbines are not generating power.
- All newly built structures that have bat conducive features must be rehabilitated to discourage bat presence: Roofs of new buildings must be sealed and any open quarries and borrow pits created during construction must be rehabilitated.
- A minimum of two year's operational bat monitoring must be conducted after the commencement of operations at the proposed Khoe WEF, as per the guidance of the latest operational SABAA guidelines. Due to the high bat activity and future installation of mitigation measures, it might be necessary to conduct operational monitoring beyond the minimum of two years.

#### 13.1.3 HERITAGE AND ARCHAEOLOGY

- A pre-construction archaeological walkdown survey of the final WEF layout must be conducted by a suitably qualified archaeologist;
- In the event of archaeological resources being encountered during the course of development, work in the immediate area must be halted and the find reported to the ECO.

The ECO must inform HWC so that mitigatory action can be determined and be implemented if necessary. The find may require inspection or collection/excavation by an archaeologist. Such heritage is the property of the state;

- Should human remains be encountered, activities work in the vicinity of the find must cease, the remains must be left in situ but made secure and HWC must be notified immediately so that mitigatory action can be determined and be implemented;
- The screening of infrastructure area(s) from the R318,
- Keeping the construction and decommissioning duration as short as possible and as much of the activity as possible out of the public view;
- Ensuring that night-time light pollution is minimized, and
- Keeping construction and maintenance-related activities in designated and approved areas.

#### 13.1.4 PALEONTOLOGY

- A Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the ECO or other responsible person once excavations have commenced, they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach.

## 14. CONCLUSION

Based on the finding of the specialist studies, the information contained in this environmental impact assessment report and the evolution of the site development plan, it is the opinion of the EAP that the proposed development can be authorised, provided the above listed mitigation measures, as well as those contained in the Draft EMPr, are adhered to by the applicant.





## APPENDIX A      APPENDIX TITLE

APPENDIX CONTENTS LIST

### **Cutsheets**

To insert additional cutsheets add **Section Page Break** after this page. Add Appendix heading using Caption function: References > Insert Caption > Appendix. Change Appendix X to "APPENDIX HEADING" style. For Figures or Tables cutsheets, simply delete the "Appendix X" text.

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**To:** [REDACTED]  
**Subject:** FW: Hugo WEF Draft EIA: SABAA response  
**Date:** Tuesday, 27 August 2024 09:40:19  
**Attachments:** [0695823\\_HUGO WEF DEIAr\\_20240823.pdf](#)

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**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, August 25, 2024 2:23 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]

[REDACTED]  
**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-deiar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-deiar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

Website: [www.sabaa.org.za](http://www.sabaa.org.za)

[REDACTED]

[REDACTED]

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

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<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
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<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd



## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

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#### **Ontwikkelingsligging:**

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##### **Khoe WEF**

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**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyen (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

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<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
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**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

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##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

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<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
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<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.



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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Tuesday, 27 August 2024 10:24:05

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You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day,

I am on leave and will be back at work on 28 August 2024.

Kind regards,  
Adri

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.  
The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.  
If you are not the intended recipient you may not copy or deliver this message to anyone."

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

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The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

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Stephanie Gopaul  
Geregistreerde  
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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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Stephanie Gopaul

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## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

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Geregistreerde  
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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
Western Cape Province  
**Date:** Friday, 30 August 2024 10:41:41

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**WARNING:** The sender of this email could not be validated and may not match the person in the "From" field.

**EXTERNAL MESSAGE**

Good day,

It is currently an EWT Contact week and we are locked in workshops. For urgent matters, please get a hold of me on my mobile [REDACTED] I will respond to your email in due course.

Regards,

Kish

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

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<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended):** *If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.*

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyen (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

Tafel 1: Publiek Hersien en Lewer kommentaar Liggings

<b>Ligging</b>	Fisies Adres
<b>Elektronies Kopie Liggings (Beskikbaar vir aflaai hieronder)</b>	
<b>ERM Webwerf (beskikbaar vir aflaai)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	B&GPe kopie versoeke kan gestuur word via One Drive gedeelde gids.
<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk



# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Wednesday, September 04, 2024 10:06 UTC

## What's your name?

*First Name*

H

*Last Name*

Kuhn

## Who do you represent?

*Organisation*

PVT capacity as neighbouring farm owner

*Designation*

Neighbouring farm owner

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

[REDACTED]

*City*

Cape Town

*State/Province*

Western Cape

*Zip Code*

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

Neighbouring farm

**Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?**

Yes

**What are your comments regarding the Hugo and Khoe WEF Facilities?**

## Wind farm objections

1. Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms
  2. Aesthetically unpleasing
  3. Noise pollution (aerodynamic noise/vortex & mechanical noise)
  4. Shadow flickers
  5. Wildlife: flying animals (currently there is a pair of endangered eagles in the mountains with fledglings, Blue crane birds, migrating ducks & geese, owls, bats, crows & hawks) Collisions with turbines, vacuum created pulls flying animals out of their current, turbines interfering with bat sonar navigation.
  6. Disturbance to Fona & Flora
  7. Affecting tourism, which this area highly relies on.
  8. Lightning & Fire damage to turbines.
  9. Wind-turbine syndrome due to possible fluctuations in air pressure, vibrations & infrasound - further research still undergoing but can't with 100% certainty be disregarded.
- 

## **Protection of Personal Information (POPI) Act, Act 4 of 2013**

Yes

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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
<b>Electronic Copy Locations (Available for download below)</b>	
<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

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<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
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<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
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<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
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**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

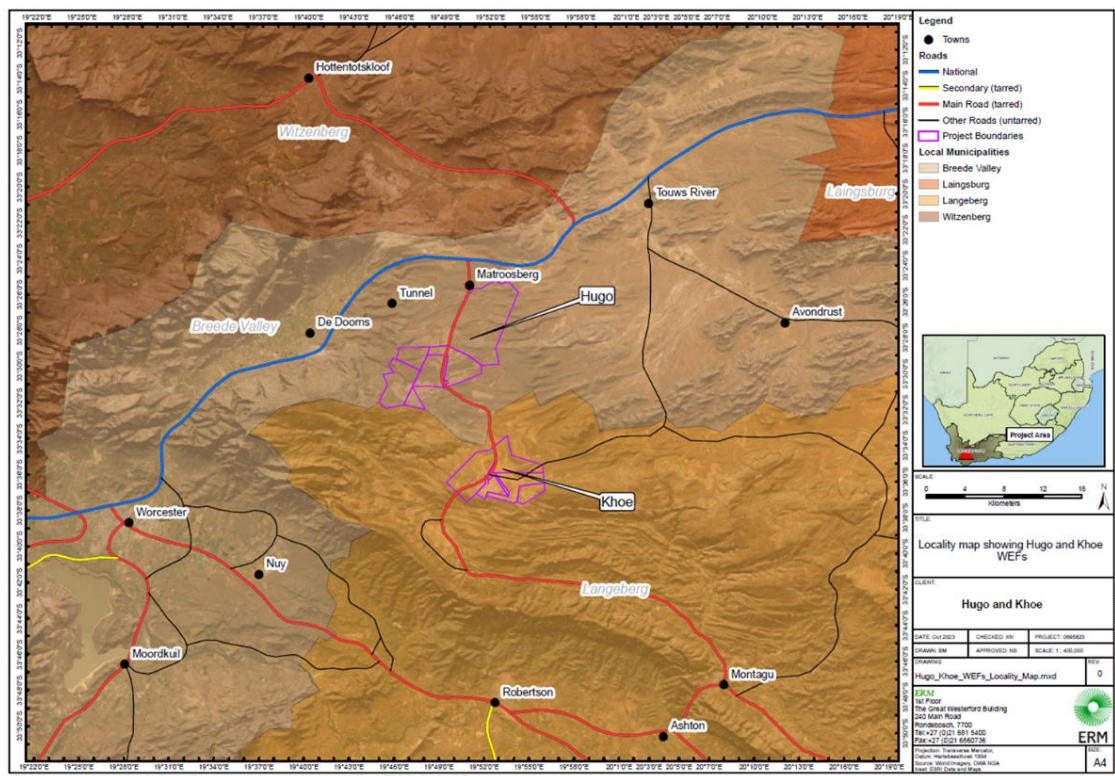
## ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE HUGO AND KHOE WIND ENERGY FACILITIES AND ANCILLARY INFRASTRUCTURE, NEAR DE DOORNS, WESTERN CAPE.

### BACKGROUND INFORMATION DOCUMENT [HUGO].



## 1. PROJECT BACKGROUND

Environmental Resources Management Southern Africa Pty Ltd (ERM) was appointed by FE Hugo & Khoe Pty Ltd to conduct an Environmental Impact Assessment (EIA) for the proposed establishment of the Hugo wind energy facilities (WEF) and associated infrastructure in the Western Cape Province. The Hugo project site is located ~10 km east of De Doorns as shown by figure 1 below.

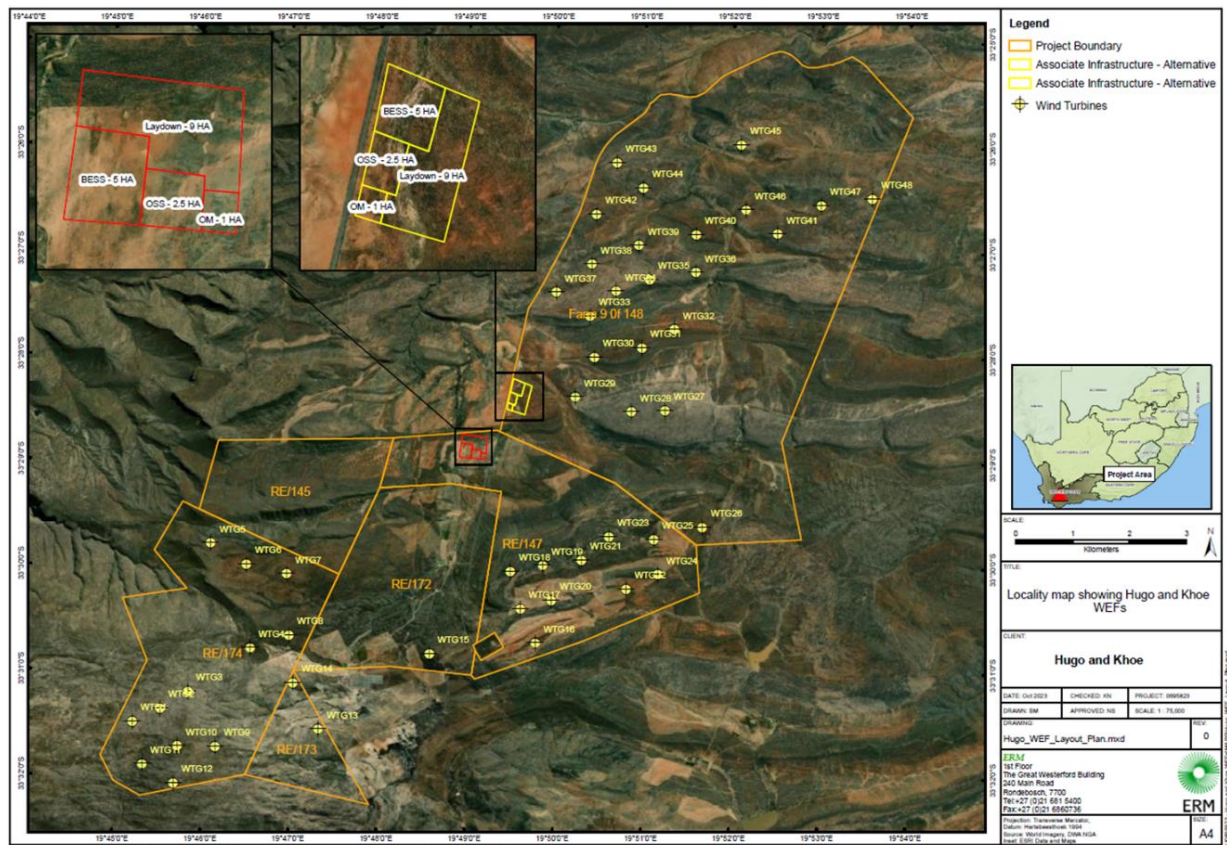


**Figure 1: Locality map of the Hugo and Khoe Project Sites.**



## 2. PROJECT DESCRIPTION

The proposed Hugo WEF will comprise up to 48 turbines with a maximum output capacity of up to 360 MW. This operation will also comprise access roads and internal roads, a Battery Energy Storage System (BESS), an Operations and Maintenance (O&M) building and a temporary site office. A 33kV underground/overhead cabling along the proposed roads and 132 kV Overhead line connecting to the IPP substation will also be installed to connect the WEF to the national electrical grid network. With this said, it must be noted that the grid connection will form part of a separate application process.



**Figure 2: A schematic layout of the proposed Hugo wind energy facility.**

## 3. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

Environmental studies will be undertaken to identify positive and negative potential environmental and social impacts for the construction and operation phases of the Project. Appropriate mitigation and compensation measures will then be proposed. The main impacts to be identified will focus on environmental aspects (e.g., landscape change, vegetation removal, habitat loss, noise increase, traffic control) and social aspects (e.g., socio-economic development, increased electricity generation, job creation, socioeconomic changes, and land use). At the scoping phase potential environmental and social impacts will be identified and based on this information, expert studies will be recommended for the ESIA phase.



## 4. ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) PROCESS

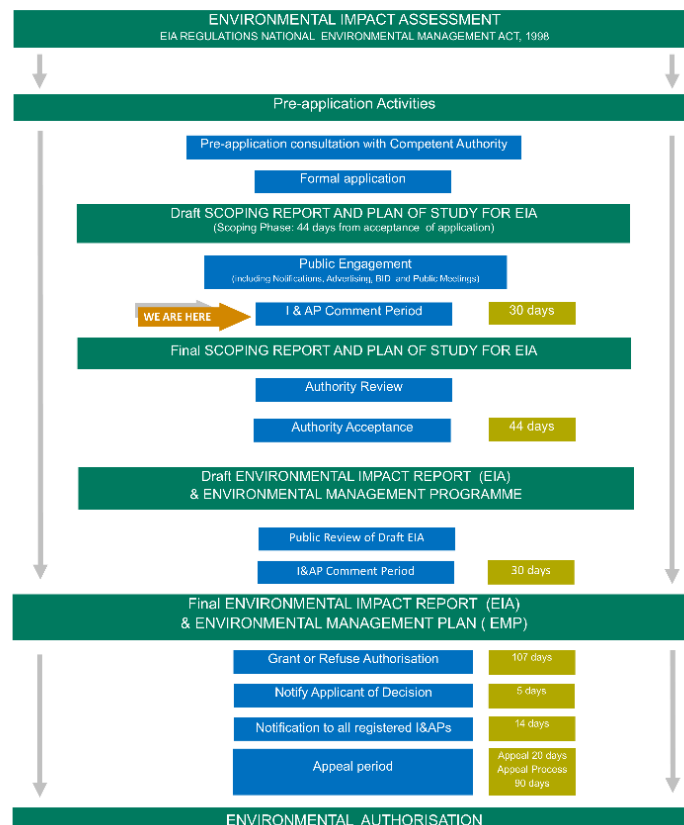
The Environmental Impact Assessment Regulations (EIA Regulations), promulgated under Government Notice R982 of 4 December 2014, as amended by Government Notice R326 of 7 April 2017, provide for the control of certain listed activities. These activities are prohibited to commence until environmental authorisation has been obtained from the competent authority. These activities are contained in:

- Listing Notice 1 (LN1): Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017.
- Listing Notice 2 (LN2): Scoping and EIA (S&EIA) of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017.
- Listing Notice 3 (LN3): Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017.

Therefore, the project triggers listed activities of Listing Notice 2 and is therefore subject to a full Scoping and Environmental Impact Assessment (S&EIA) Process as follows:

### The Environmental Impact Assessment Process

The EIA process addresses potential issues raised by I&AP's in the scoping phase, identifying and assessing alternatives, to identify and assess significant impacts and developing mitigation measures. This will include the undertaking of an impact assessment, meeting with stakeholders and authorities, the conducting specialist and desktop studies, including fieldwork.





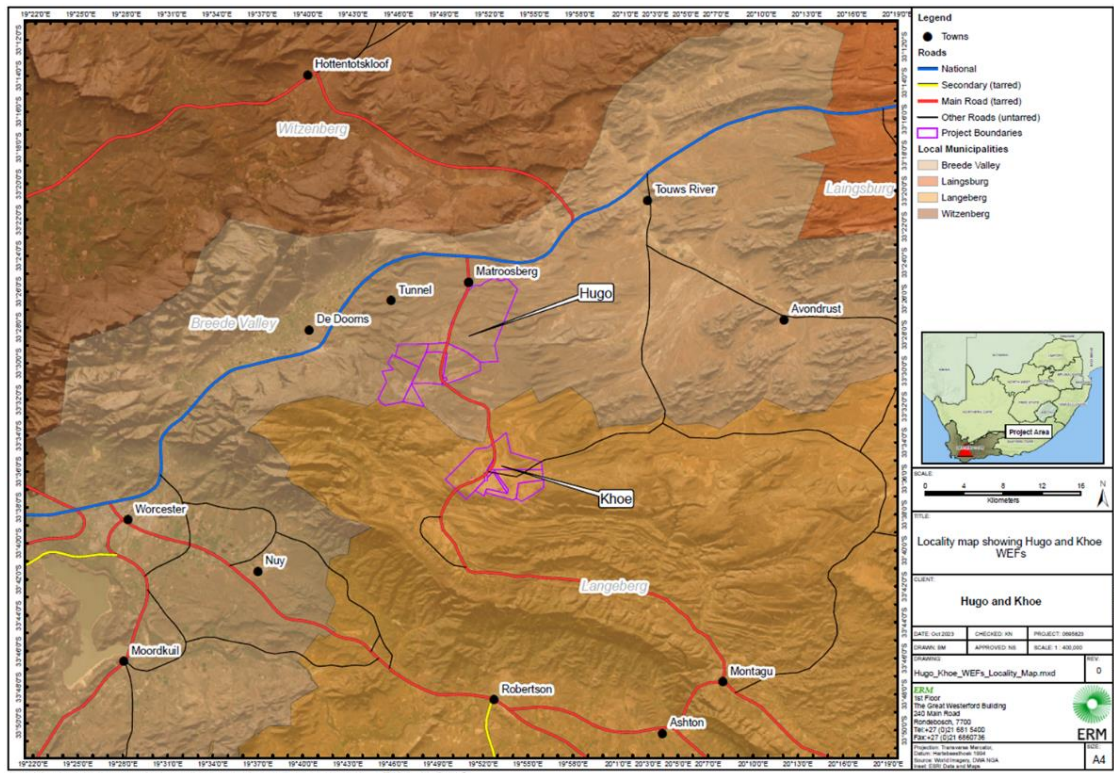
## OMGEWINGSIMPAKASSESSERINGSPROSES VIR DIE HUGO- EN KHOE-WINDENERGIE-FASILITEITE EN ONDERHOUDENDE INFRASTRUKTUUR, NABY DE DOORNS, WES-KAAP.

### AGTERGRONDINLIGTING-DOKUMENT [HUGO].



## 1. PROJEK-AGTERGROND

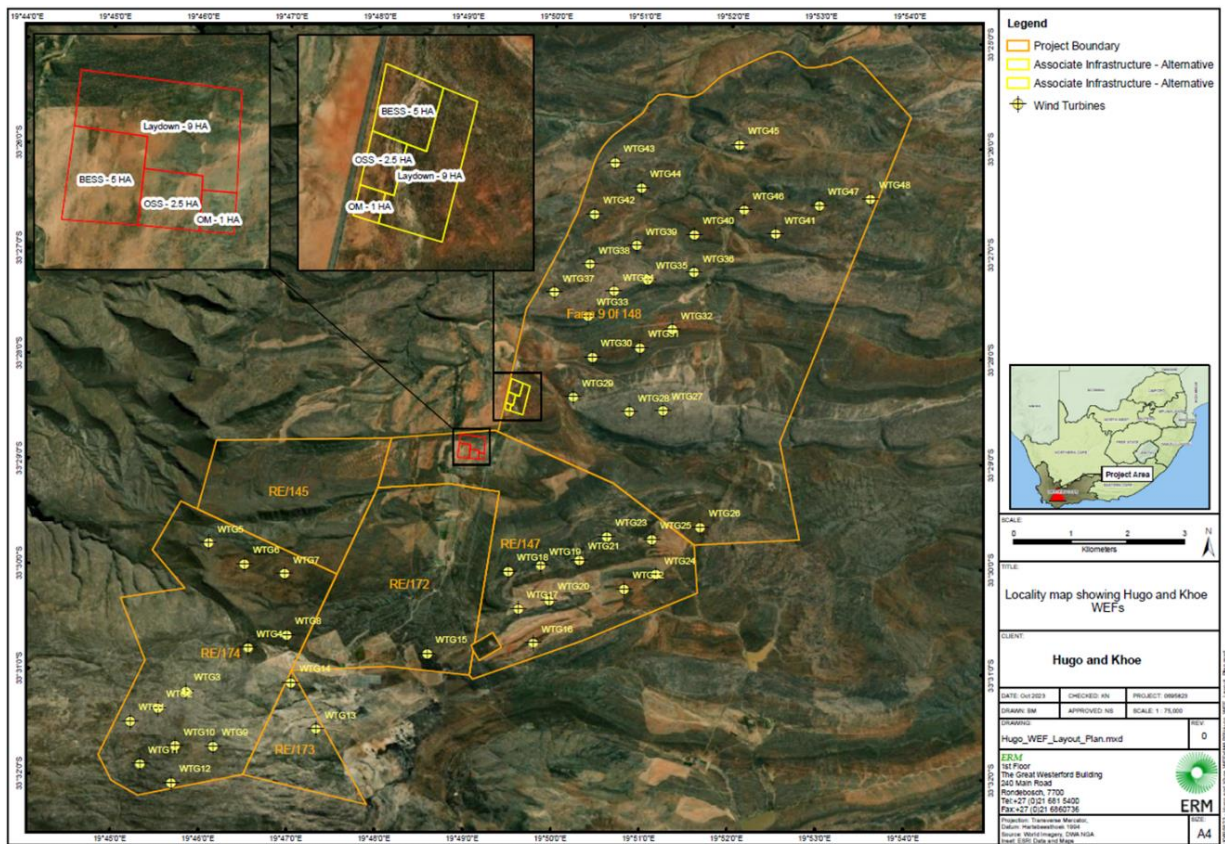
Environmental Resources Management Southern Africa Pty Ltd (ERM) is deur FE Hugo & Khoe Pty Ltd aangestel om 'n Omgewingsimpakassessering (OIA) te onderneem vir die voorgestelde oprigting van die Hugo-windenergie-fasiliteit (WEF) en gepaardgaande infrastruktuur in die Wes-Kaapprovinsie. Die Hugo-projekterrein is geleë ~10 km oos van De Doorns soos in figuur 1 onder getoon.



**Figuur 1: Liggingskaart van die Hugo- en Khoe-projekterreine.**

## 2. PROJEKBESKRYWING

Die voorgestelde Hugo-WEF sal bestaan uit tot 48 turbines met 'n maksimum leweringse kapasiteit van tot 360 MW. Hierdie bedryf sal ook bestaan uit toegangspaaie en interne paaie, 'n battery-energie-bergingstelsel (BESS), 'n bedryfs- en instandhoudings- (O&M) gebou en 'n tydelike terreinkantoor. 'n Ondergrondse/oorhoofse kabel van 33 kV langs die voorgestelde paaie en 'n oorhoofse lyn van 132 kV vir verbinding met die IPP-substasie sal ook geïnstalleer word om die WEF te verbind met die nasionale elektrisiteitsnetwerk. Maar neem asseblief kennis dat die netwerkverbinding deel sal uitmaak van 'n afsonderlike aansoekproses.





#### 4. OMGEWINGS- EN SOSIALE IMPAKASSESSERINGS- (OSIA) PROSES

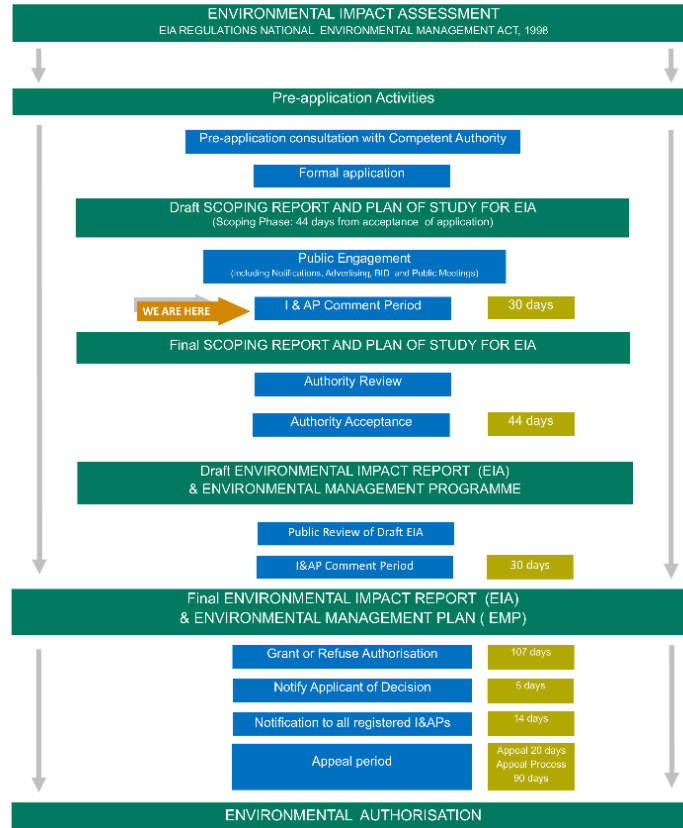
Die Omgewingsimpakassesseringsregulasies (OIA-regulasies), afgekondig kragtens Goewermentskennisgewing R982 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R326 van 7 April 2017, maak voorsiening vir die beheer van sekere gelyste aktiwiteite. Daar mag nie met hierdie aktiwiteite begin word voordat omgewingsmagtiging van die bevoegde owerheid verkry is nie. Hierdie aktiwiteite is vervat in:

- Lyskennisgewing 1 (LN1): Basiese assessering (BA) van die OIA-regulasies, afgekondig kragtens Goewermentskennisgewing R983 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R327 van 7 April 2017.
- Lyskennisgewing 2 (LN2): Omvang en OIA (O&OIA) van die OIA-regulasies, afgekondig kragtens Goewermentskennisgewing R984 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R325 van 7 April 2017.
- Lyskennisgewing 3 (LN3): Basiese Assessering (BA) van die OIA-regulasies, afgekondig kragtens Goewermentskennisgewing R985 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R324 van 7 April 2017.

Die projek sit dus gelyste aktiwiteite van Lyskennisgewing 2 aan die gang en is daarom onderhewig aan 'n volledige omvang- en omgewingsimpakassesserings- (O&OIA) proses, soos volg:

## The Environmental Impact Assessment Process

The EIA process addresses potential issues raised by I&AP's in the scoping phase, identifying and assessing alternatives, to identify and assess significant impacts and developing mitigation measures. This will include the undertaking of an impact assessment, meeting with stakeholders and authorities, the conducting specialist and desktop studies, including fieldwork.



## Registrasie- en kommentaar-blad Desember 2023

**Indien u enige navrae, kommentaar of voorstelle oor die voorgestelde projek het, moet u dit asseblief hier onder aanteken.**  
Besorg hierdie kommentaar-blad terug aan Khosi Ngema van ERM Southern Africa:

Tel: +27105963690

E-pos: [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

Registreer my asseblief formeel as 'n belanghebbende en geraakte party (B&GP) en voorsien verdere inligting en kennisgewings gedurende die EIA-proses.	<b>Ja</b>	<b>Nee</b>
Ek wil graag my kennisgewings ontvang per:	<b>Hand</b>	<b>E-pos</b>
	<b>Pos</b>	<b>Faks</b>



## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.



Table 1: Public Review and Comment Locations

Location	Physical Address
<b>Electronic Copy Locations (Available for download below)</b>	
<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended):** *If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.*

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Hugo WEF Draft EIA: SABAA response  
**Date:** Wednesday, 11 September 2024 08:50:46

---

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, August 25, 2024 2:23 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>; Sadiya Salie <Sadiya.Salie@erm.com>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-dejar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-dejar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 “The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance” does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

Website: [www.sabaa.org.za](http://www.sabaa.org.za)





**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Thursday, 12 September 2024 14:50:47  
**Attachments:** [image007.png](#)  
[image015.png](#)  
[image016.png](#)  
[image017.png](#)

Thank you for your response. This has been noted.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, September 6, 2024 8:43 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <hugokhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Your e-mail dated 01.07.2024 refers.

Kindly note that Transnet will not be directly affected by the proposal. Please refer to the attached Google Imagery.

The distance from **Matroosberg High Site** to the **nearest Wind Turbine (WTG5)** is **± 2km**.

The distance from **Matroosberg Station railway line** to the **nearest Wind Turbine (WT43 and WTG45)** is **800m**

Kind Regards.



[REDACTED]  
Infrastructure Maintenance  
Transnet Freight Rail, Bellville



[www.transnet.net](http://www.transnet.net)

TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]  
**Sent:** Monday, July 8, 2024 1:28 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

For your further attention, please.

---

TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]

**Sent:** Friday, July 5, 2024 12:23 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Good day Annelize

This notification relates to the attached correspondence.

Please note that our response remains the same.

Kind Regards



[REDACTED]  
Technician (Property)  
Geo-Spatial - Western Cape Region  
Transnet Property  
Room 505, 1 Adderley Street, Cape Town, 8001  
[REDACTED] [REDACTED] [REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, July 2, 2024 8:41 AM

**To:** [REDACTED]

**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Hi Lucky

Please check if Transnet will be affected by this application.

Thanks,

Kind regards

**Burton Siljeur**  
Chief Technician (Property)  
Geo-Spatial: Western Region  
Transnet Property  
No. 1 Adderley Street, Cape Town



TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]  
**Sent:** Tuesday, July 2, 2024 8:21 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

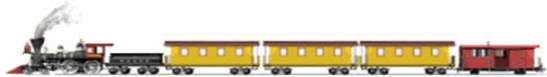
Good Morning

The attached Notification is for your further attention and comments, please.

Regards

**Annelize Harmse**  
**Chief Admin Official**

[REDACTED]  
138 Eloff Street  
4<sup>th</sup> Floor, Central Wing  
BRAAMFONTEIN  
JOHANNESBURG  
2001



TRANSNET CONFIDENTIAL INFORMATION

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Monday, July 1, 2024 2:02 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**⚠ CAUTION: EXTERNAL SENDER - Please be careful when opening links and attachments. ⚠**

Please report any suspicious mail to [phishing@transnet.net](mailto:phishing@transnet.net). Transnet Information Security

Dear Registered Interested and Affected Party

**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Hugo and Khoe WEF, in the Western Cape Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from Thursday, 29 February 2024 until Tuesday, 02 April 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 13 September 2024 14:12:09  
**Attachments:** [IAP Verwysings brief Afrikaans.pdf](#)  
[image001.png](#)  
[IAP Notification Letter English.pdf](#)

---

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, August 30, 2024 10:40 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

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<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
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<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.



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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

Tafel 1: Publiek Hersien en Lewer kommentaar Liggings

<b>Ligging</b>	Fisies Adres
<b>Elektronies Kopie Liggings (Beskikbaar vir aflaai hieronder)</b>	
<b>ERM Webwerf (beskikbaar vir aflaai)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	B&GPe kopie versoeke kan gestuur word via One Drive gedeelde gids.
<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

Tafel 1: Publiek Hersien en Lewer kommentaar Liggings

<b>Ligging</b>	Fisies Adres
<b>Elektronies Kopie Liggings (Beskikbaar vir aflaai hieronder)</b>	
<b>ERM Webwerf (beskikbaar vir aflaai)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	B&GPe kopie versoeke kan gestuur word via One Drive gedeelde gids.
<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.



Table 1: Public Review and Comment Locations

Location	Physical Address
<b>Electronic Copy Locations (Available for download below)</b>	
<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended):** *If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.*

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 13 September 2024 14:14:54

---

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Please note that I am on sick leave from 10 to 13 September 2024. For urgent matters, please email [REDACTED]  
[REDACTED] Thanks

**Disclaimer**

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed [here](#).

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [Brandon Layman](#); [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 16 September 2024 12:41:17  
**Attachments:** [image001.png](#)

---

Hi Brandon,

Thank you for informing us. We will send a USB, consisting of both EIAs as soon as possible.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, September 16, 2024 12:25 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Hi Sadiya Salie

Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General.

The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that.

As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy.

The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network.

CD or USB we can still put on a physical file.

With many thanks and kind regards



Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
ELSENBURG  
7607

GPS koördinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road



Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)

Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** 30 August 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com).  
[Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23

September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.

The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.

If you are not the intended recipient you may not copy or deliver this message to anyone."

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 14:49:34  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---

**EXTERNAL MESSAGE**

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla

**B&C: Biodiversity Mainstreaming & EIA**

Department of Forestry, Fisheries and the Environment

Environment House

473 Steve Biko and Soutpansberg Streets

PRETORIA

[REDACTED]

[REDACTED]

Call Centre: 086 111 2468



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe

Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above



documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 14:56:32  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** Portia Makitla <PMakitla@dffe.gov.za>  
**Sent:** Thursday, September 19, 2024 2:46 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA  
[REDACTED]  
[REDACTED]  
[REDACTED]



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

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Please indicate which application your comment in respect of.

Thank you and regards,



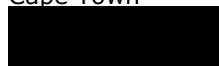
**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 15:02:42  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 19, 2024 2:46 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA  
[REDACTED]  
[REDACTED]  
[REDACTED]



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

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the

proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



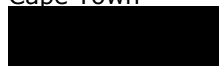
**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 15:05:40  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---

**EXTERNAL MESSAGE**

Good day

Our telephone conversation refers.

This email confirms the minor error on the comment's letters with regard to the number of turbines. The correct number of turbines for Hugo are 42 turbines with the out put of 336MW and 29 turbines with the output of 232MW for Khoe.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[REDACTED]  
[REDACTED]  
[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Thursday, 19 September 2024 14:46  
**To:** HugoKhoe@erm.com  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Good day

Please find attached comments for the aforementioned project.



Thanks & Regards 

Ms. Mashienyane Portia Makitla

**B&C: Biodiversity Mainstreaming & EIA**

Department of Forestry, Fisheries and the Environment

Environment House

473 Steve Biko and Soutpansberg Streets

PRETORIA

[REDACTED]  
[REDACTED]  
[REDACTED]



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

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

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Thank you,

Kind Regards

**Sadiya Salie**



**ERM**

Sustainability is our business

Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,

**Sadiya Salie**  
Consultant



**ERM**

Sustainability is our business

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**Subject:** Drie Kuilen Nature Reserve's Comment to Draft EIA Reports for Proposed Hugo and Khoe Wind Energy Facilities

**Date:** 2024/09/19

**To:**

ERM Southern Africa (Pty) Ltd.  
1 st Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
Cape Town,  
7700  
South Africa

This letter serves as a formal comment from **Drie Kuilen Nature Reserve** regarding the **Draft Environmental Impact Assessment (EIA) Reports** for the proposed Hugo and Khoe Wind Energy Facilities near De Doorns, Western Cape Province, dated August 2024. We are submitting this comment under the **Public Participation Process (PPP)** in accordance with the requirements of Section 24(5) and Chapter 6 (41, 42, 43, and 44) of **GN R. 326 of the National Environmental Management Act (NEMA), 1998**, and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

### **Summary of Concerns**

As the custodians of Drie Kuilen Nature Reserve, a formally protected area and eco-tourism destination located 3 km east of the proposed development site, we strongly oppose the construction of these wind energy facilities. Our concerns are based on the following key impacts:

1. **Biodiversity Risks:** The development poses severe threats to endangered and vulnerable species in the area, particularly the riverine rabbit, Verreaux's eagle, blue crane, and others.
2. **Visual and Scenic Landscape:** The facilities will significantly disrupt the natural landscape that is crucial for eco-tourism, which forms the backbone of our economic activities.
3. **Economic Impact on Eco-Tourism:** The development will lead to a loss of income due to the visual and noise disturbances that will detract from the appeal of our reserve.
4. **Accessibility to the Reserve:** Closure of Nougaspoort Road during construction will negatively affect tourism.

### **Detailed Points of Objection**

#### **1. Biodiversity and Endangered Species**

Camera trap surveys conducted as part of the environmental assessment on the proposed site recorded several vulnerable and endangered species, including the

**riverine rabbit** and **grey rhebuck** (**Cape Nature Response, 7 February, 2024**).

These species are important indicators of the region's ecological health. However, the collision risk modeling identified significant risks to species of conservation concern, including the **blue crane** (*Anthropoides paradiseus*, **near-threatened**) and **Verreaux's eagle** (*Aquila verreauxii*, **vulnerable**), among others. The estimated mortality rates for these species, even with mitigation measures, remain unacceptably high (Final Avifaunal Impact Assessment, Dr. R.E. Simmons et al., 7 August 2024). These species (excluding riverine rabbit) have also been observed on Drie Kuilen Nature Reserve, raising concerns that the proposed wind farm could have a detrimental impact on the health and sustainability of their populations. We argue that the proposed location of the wind energy facilities will lead to irreparable harm to these species, and the project should be relocated to a more suitable site where these risks can be avoided.

## 2. Impact on Visual Landscape and Scenic Integrity

Drie Kuilen Nature Reserve is located within a UNESCO-recognized **Cape Floral Region**, and the natural beauty of the landscape is a primary attraction for tourists. The **Visual Impact Assessment (VIA)** concluded that the **Khoe Wind Energy Facility** would have a **very high negative impact** on protected areas, including Drie Kuilen. Despite mitigation measures, the turbines will be visible from key viewpoints such as **Klipstapels**, severely affecting the aesthetic and tranquil experience of our visitors (Visual Impact Assessment, Lourens du Plesis, July 2024).

The cumulative visual impact of both the Hugo and Khoe Wind Energy Facilities would result in an unacceptable loss of visual resources within the region (Social Impact Assessment, Tony Barbour, August 2024).

## 3. Economic Impact on Eco-Tourism

The primary income for Drie Kuilen Nature Reserve is derived from eco-tourism, which is heavily dependent on the area's natural and undeveloped landscape. Should the wind energy facilities be constructed, the disruptions to the views, tranquillity, and overall experience of the reserve will lead to a significant reduction in visitor numbers and a corresponding loss of revenue.

International studies on the impact of wind farms on tourism in scenic areas have found that the presence of large turbines can detract from the rural character of the region and negatively impact tourism revenue. In this case, the benefits of the proposed project are **not site-specific** and could be achieved in a less sensitive location, without compromising the economic viability of local tourism (Social Impact Assessment, Tony Barbour, August 2024).

## 4. Accessibility to the Reserve

We are concerned that the construction of this project will result in the temporary closure of a section of **Nougaspoort Road**, which is vital for tourism access to Drie Kuilen. The alternative route from Touws River is often inaccessible after heavy rains, which could severely impact visitor access and, consequently, our eco-tourism operations.

## Request for Action

Given the severe risks posed to biodiversity, the negative impact on the scenic landscape, and the potential economic losses to local eco-tourism, we strongly oppose the current proposal for the Hugo and Khoe Wind Energy Facilities. We urge the authorities to reject the project in its current form and consider relocating it to a more suitable area where the environmental and economic impacts will be minimized.

### **Conclusion**

We respectfully request that our concerns be fully considered in the final decision-making process for the Environmental Impact Assessment. Drie Kuilen Nature Reserve, as an important contributor to biodiversity conservation and eco-tourism, cannot support the proposed development due to the detrimental effects it will have on the region.

For further correspondence or queries, please contact:

Stefan Short  
SACNASP reg No. 152831  
Manager  
Drie Kuilen Nature Reserve

████████████████████  
██████████

Thank you for considering our comments.

Sincerely,  
Drie Kuilen Nature Reserve



# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Sunday, September 22, 2024 17:28 UTC

## What's your name?

*First Name*

Johan and Karen

*Last Name*

Kritzinger

## Who do you represent?

*Organisation*

Eximia Nature Reserve

*Designation*

Owners

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*Street Address Line 2*

[REDACTED]

*City*

Cape Town

*State/Province*

Western Cape

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

We are the owners of the neighboring farm to the proposed Khoe Windfarm - Eximia (previously know as Kopbeenskloof)

## Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes



## **What are your comments regarding the Hugo and Khoe WEF Facilities?**

### COMMENTRY BY EXIMIA NATURE RESERVE ON THE DRAFT ENVIROMENTAL IMPACT ASSESMENT FOR THE PROPOSED KHOE WINDFARM

We herewith register our objection to the proposed Khoe Windfarm project for the following reasons:

1. Visual Impact Assessment (VIA) - We agree with the report's conclusion that from a visual perspective the windfarm is **FATALLY FLAWED** for all the reasons and supporting evidence highlighted in the VIA.

In addition to the visual impact study and in support thereof we would like to highlight the following:

- The negative impact to the magnificent and uninterrupted vistas of the area.
- The lasting impact to the tranquil and undisturbed Karoo landscape and unique atmosphere.

2. Social Impact Assessment (SIA) - We agree with the Social Impact Assessment's findings of the extremely high negative cumulative impacts and therefore that the project is **FATALLY FLAWED** from a Social Impact perspective. We support this finding based on all the matters raised and expanded on in the SIA. We would like to make the following comments in support of the findings:

- Negative impact to currently expanding eco-tourism in the area between the N1 and the R62.
- The area falls within the Cape Flora Region which is a World Heritage Site recognised by UNESCO.
- Tourism is one of South Africa's and especially the Western Cape's fastest growing economies.
- The resultant negative impact on current and future sustainable job opportunities because of the negative impact the Windfarm project will have on the future growth of the eco and adventure tourism industry.
- The reduced likelihood of the future investment in eco and adventure tourism in the area.
- The development of the proposed Khoe WEF is not supported in the area to the south of the N1
- The report further points out that the area does not fall within the REDZ zone, a geographical area within which wind and solar projects can occur in concentrated zones within a 35 km radius.
- The Western Cape Provincial Spatial Development Framework highlights the importance to the province's landscape and scenic assets and the threat posed by large scale infrastructural developments such as wind farms.
- The Langeberg Spatial Development Framework also identifies the R318 as a scenic route and highlights the importance of preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture. Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction and promoting tourism.
- It is also important to note that the benefits associated with the Khoe WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.
- The Khoe wind farm in its current proposed form and structure will certainly place the continued investment at Eximia Nature Reserve at risk, eliminating its contribution to the eco-tourism and job creation in the area.

3. Biodiversity Impact Assessment (BIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.

Wildlife and floral communities face direct mortality due to increased traffic and human presence, coupled with illegal collection, poaching, and entrapment. Avifaunal and bat species also face collision risks with turbine blades.

The Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*)

occur on Eximia and would face these potential dangers.

4. The Avian Impact Assessment (AIA) - refers to the mortal danger to endemic and threatened birds of the area by the proposed windfarm.

Eximia Nature Reserve was never contacted by the team working on the AIA. We are also not sure whether the team physically visited the area or whether their study is merely a desk top based study. We base this on the fact that actual sightings are often made of certain endemic and threatened birds on Eximia Nature Reserve which are not referred to in the study.

For instance we often observe a breeding pair of Verreaux's Eagles with their juvenile hunting at Eximia Nature Reserve. In fact, we observed them hunting in their regular spot, today (22 September 2024) which is within the 3.0 km buffer range from turbines WTG32, WTG33 and WTG34 as required. Video footage is available for inspection.

We also often observe Black Harriers hunting in the area where turbine WTG37 is envisaged. It is therefore questionable whether the information used to arrive at the buffer zones and the overall findings and mitigation recommendations of the AIA are credible.

---

### **Protection of Personal Information (POPI) Act, Act 4 of 2013**

Yes

---

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Sunday, 22 September 2024 19:47:34  
**Attachments:** [COMMENTRY ON PROPOSED KHOE WINDFARM DRAFT EINVIROMENTAL IMPACT STUDY.docx](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day Sadiya

We would like to make sure that **we have been registered now** as Interested and Affected Party of the Hugo & Khoe WEF Ref 0695823.

We previously registered on the online platform , our names and comments were not included in the Draft Assessment Report.

We own the neighbouring farm to the farm Eendrag , where the Khoe Windfarm is envisaged.

Names: Johan and Karen Kritzinger

[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Hugo WEF Draft EIA: SABAA response  
**Date:** Monday, 23 September 2024 09:13:22

---

Hi Eleanor,

Thank you for your feedback.

We have updated the final EIA Report, taking into consideration your comments. Please note it was not our intention to 'hide' the sensitivity of bats, thus we have revised the report to include the high sensitivity zones.

Please also note, we have not included bat and bird species under the Table 6.2, as these were assessed separately.

Kind Regards

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](http://erm.com)**

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Sunday, August 25, 2024 2:23 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-dejar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-dejar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

*Website: [www.sabaa.org.za](http://www.sabaa.org.za)*



<< OLE Object: Picture (Device Independent Bitmap) >>

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Hugo WEF Draft EIA: SABAA response  
**Date:** Monday, 23 September 2024 09:13:39

---

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

---

**From:** Sadiya Salie

**Sent:** Monday, September 23, 2024 9:13 AM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Hugo WEF Draft EIA: SABAA response

Hi Eleanor,

Thank you for your feedback.

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Kind Regards

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](http://erm.com)**

[REDACTED]

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Sunday, August 25, 2024 2:23 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

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the Draft EIA does not adequately convey the risk that this site is to developers.

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Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

Website: [www.sabaa.org.za](http://www.sabaa.org.za)



<< OLE Object: Picture (Device Independent Bitmap) >>



From: [REDACTED]  
To: [REDACTED]  
Subject: RE: New Response for "Stakeholder Engagement"  
Date: Monday, 21 September 2020 09:12:04

Hi Kuba,

Thank you for your comments.

Clearly your client studies have been undertaken to address the points you have raised. The studies adequately assessed the following:

- Visual, including aviation
- Noise
- Flora and Fauna
- Avifauna

The comments raised will be taken forward and incorporated into the Final EIA Report.

Kind Regards

Sally Sibley  
Consultant ERM Ltd Floor, 240 Main Road Rouseburgh, Green Waterford, Cape Town

[REDACTED]  
From: [REDACTED]  
Sent: Wednesday, September 9, 2020 12:08 PM  
To: ERM Group & Kuba Wind Energy Facilities <gub@erm.com>  
Subject: New Response for "Stakeholder Engagement"

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutYourAccount>]

EXTERNAL MESSAGE:

Dear AddForm user,

Your form "Stakeholder Engagement" has a new response.

1. What's your name?

Hi Kuba

2. What do you represent?

PVT coporate or neighbouring farm owner Neighbouring farm owner

3. Your Email

[REDACTED]

4. Your Phone Number

[REDACTED]

5. Stakeholder Name/Number

[REDACTED]

6. Your Address

[REDACTED]

7. What is your interest in the project?

Neighbouring farm

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

9. What are your comments regarding the Stage and Know WEF Facilities?

Wind farm objection

- Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms
- Aesthetically unpleasant
- Noise pollution (intermittent noise/whirring & mechanical noise)
- Shade flicker
- Wildlife: Flying animals (currently there is a pair of endangered eagles in the mountains with fledglings. Blue crane birds, migrating ducks & geese, owls, bats, cranes & hawks) Collisions with turbines, vacuum created pulls flying animals out of their current, turbine interfering with bat roost navigation.
- Disturbance to Flora & Fauna
- Afflicting tourism, which this area highly relies on.
- Lighting at the stage to turbines.
- Wind turbine operations due to possible fluctuations in air pressure, vibrations & infrasound - further research still undergoing but can't with 100% certainty be discounted.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 Yes

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or [info@addform.erm.com](mailto:info@addform.erm.com)  
or <https://aka.ms/2f9aaddform>

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Your AddForm Team



# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Sunday, September 22, 2024 17:28 UTC

## What's your name?

*First Name*

Johan and Karen

*Last Name*

Kritzinger

## Who do you represent?

*Organisation*

Eximia Nature Reserve

*Designation*

Owners

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*Street Address Line 2*

[REDACTED]

*City*

Cape Town

*State/Province*

Western Cape

*Zip Code*

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

We are the owners of the neighboring farm to the proposed Khoe Windfarm - Eximia (previously know as Kopbeenskloof)

## Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

## **What are your comments regarding the Hugo and Khoe WEF Facilities?**

### COMMENTRY BY EXIMIA NATURE RESERVE ON THE DRAFT ENVIROMENTAL IMPACT ASSESMENT FOR THE PROPOSED KHOE WINDFARM

We herewith register our objection to the proposed Khoe Windfarm project for the following reasons:

1. Visual Impact Assessment (VIA) - We agree with the report's conclusion that from a visual perspective the windfarm is **FATALLY FLAWED** for all the reasons and supporting evidence highlighted in the VIA.

In addition to the visual impact study and in support thereof we would like to highlight the following:

- The negative impact to the magnificent and uninterrupted vistas of the area.
- The lasting impact to the tranquil and undisturbed Karoo landscape and unique atmosphere.

2. Social Impact Assessment (SIA) - We agree with the Social Impact Assessment's findings of the extremely high negative cumulative impacts and therefore that the project is **FATALLY FLAWED** from a Social Impact perspective. We support this finding based on all the matters raised and expanded on in the SIA. We would like to make the following comments in support of the findings:

- Negative impact to currently expanding eco-tourism in the area between the N1 and the R62.
- The area falls within the Cape Flora Region which is a World Heritage Site recognised by UNESCO.
- Tourism is one of South Africa's and especially the Western Cape's fastest growing economies.
- The resultant negative impact on current and future sustainable job opportunities because of the negative impact the Windfarm project will have on the future growth of the eco and adventure tourism industry.
- The reduced likelihood of the future investment in eco and adventure tourism in the area.
- The development of the proposed Khoe WEF is not supported in the area to the south of the N1
- The report further points out that the area does not fall within the REDZ zone, a geographical area within which wind and solar projects can occur in concentrated zones within a 35 km radius.
- The Western Cape Provincial Spatial Development Framework highlights the importance to the province's landscape and scenic assets and the threat posed by large scale infrastructural developments such as wind farms.
- The Langeberg Spatial Development Framework also identifies the R318 as a scenic route and highlights the importance of preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture. Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction and promoting tourism.
- It is also important to note that the benefits associated with the Khoe WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.
- The Khoe wind farm in its current proposed form and structure will certainly place the continued investment at Eximia Nature Reserve at risk, eliminating its contribution to the eco-tourism and job creation in the area.

3. Biodiversity Impact Assessment (BIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.

Wildlife and floral communities face direct mortality due to increased traffic and human presence, coupled with illegal collection, poaching, and entrapment. Avifaunal and bat species also face collision risks with turbine blades.

The Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*)

occur on Eximia and would face these potential dangers.

4. The Avian Impact Assessment (AIA) - refers to the mortal danger to endemic and threatened birds of the area by the proposed windfarm.

Eximia Nature Reserve was never contacted by the team working on the AIA. We are also not sure whether the team physically visited the area or whether their study is merely a desk top based study. We base this on the fact that actual sightings are often made of certain endemic and threatened birds on Eximia Nature Reserve which are not referred to in the study.

For instance we often observe a breeding pair of Verreaux's Eagles with their juvenile hunting at Eximia Nature Reserve. In fact, we observed them hunting in their regular spot, today (22 September 2024) which is within the 3.0 km buffer range from turbines WTG32, WTG33 and WTG34 as required. Video footage is available for inspection.

We also often observe Black Harriers hunting in the area where turbine WTG37 is envisaged. It is therefore questionable whether the information used to arrive at the buffer zones and the overall findings and mitigation recommendations of the AIA are credible.

---

### **Protection of Personal Information (POPI) Act, Act 4 of 2013**

Yes

---



**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: New Response for "Stakeholder Engagement"  
**Date:** Monday, 23 September 2024 11:06:46

---

**WARNING:** The sender of this email could not be validated and may not match the person in the "From" field.

**EXTERNAL MESSAGE**

I am on leave overseas (4-20 July). For urgent BBU matters contact [REDACTED] or send a WhatsApp voice note or text to [REDACTED]. Thanks Rob

Disclaimer - University of Cape Town This email is subject to UCT policies and email disclaimer published on our website at <https://www.uct.ac.za/main/email-disclaimer> or obtainable from +27 21 650 9111. If this email is not related to the business of UCT, it is sent by the sender in an individual capacity. Please report security incidents or abuse via <https://csirt.uct.ac.za/report-incident>

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Monday, 23 September 2024 11:06:47  
**Attachments:** [COMMENTRY ON PROPOSED KHOE WINDFARM DRAFT EINVIROMENTAL IMPACT STUDY.docx](#)  
[image001.png](#)

---

Same here, they questioning the buffer zones.



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, September 22, 2024 7:47 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day Sadiya

We would like to make sure that we have been registered now as Interested and Affected Party of the Hugo & Khoe WEF Ref 0695823.

We previously registered on the online platform , our names and comments were not included in the Draft Assessment Report.

We own the neighbouring farm to the farm Eendrag , where the Khoe Windfarm is envisaged.

Names: Johan and Karen Kritzinger  
[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger  
[REDACTED]  
[REDACTED]



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** RE: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 23 September 2024 11:31:31  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Thank you Portia,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 19, 2024 3:05 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Our telephone conversation refers.

This email confirms the minor error on the comment's letters with regard to the number of turbines. The correct number of turbines for Hugo are 42 turbines with the out put of 336MW and 29 turbines with the output of 232MW for Khoe.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

**From:** [Redacted]  
**Sent:** Thursday, 19 September 2024 14:46  
**To:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)  
**Cc:** [Redacted]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Friday, 13 September 2024 14:12  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [Redacted]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



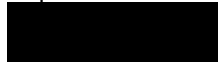
**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** RE: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 23 September 2024 11:31:35  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Thank you Portia,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

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Good day

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Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA



[Redacted]



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**From:** [Redacted]  
**Sent:** Thursday, 19 September 2024 14:46  
**To:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)  
**Cc:** [Redacted]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Please find attached comments for the aforementioned project.

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**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

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Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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Please indicate which application your comment in respect of.

Thank you and regards,



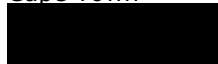
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**Sadiya Salie**  
Consultant

---

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town





# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Monday, September 23, 2024 10:37 UTC

## What's your name?

*First Name*

H

*Last Name*

Kuhn

## Who do you represent?

*Organisation*

Self

*Designation*

Farm owner

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*Street Address Line 2*

[REDACTED]

*City*

Langeberg District

*State/Province*

Western Cape

*Zip Code*

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

Affected neighbouring farm owner

**Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?**

Yes

## **What are your comments regarding the Hugo and Khoe WEF Facilities?**

Wind farm objections

1. Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms
2. Aesthetically unpleasing
3. Noise pollution (aerodynamic noise/vortex & mechanical noise)
4. Shadow flickers
5. Wildlife: flying animals (currently there is a pair of endangered eagles in the mountains with fledglings, Blue crane birds, migrating ducks & geese, owls, bats, crows & hawks) Collisions with turbines, vacuum created pulls flying animals out of their current, turbines interfering with bat sonar navigation.
6. Disturbance to Fona & Flora
7. Affecting tourism, which this area highly relies on.
8. Lightning & Fire damage to turbines.
9. Wind-turbine syndrome due to possible fluctuations in air pressure, vibrations & infrasound - further research still undergoing but can't with 100% certainty be disregarded.

How is it that DK hasn't been informed or involved in any avian studies while being mentioned in the reports....

---

## **Protection of Personal Information (POPI) Act, Act 4 of 2013**

No

---

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Wednesday, 25 September 2024 11:39:32

---

**EXTERNAL MESSAGE**

Good day

Thank you for your email, please note I am currently unavailable, and sick, will reponse in due course.

If your matter requires urgent attention, please contact please contact one of the officials:  
<https://www.hwc.org.za/node/1873>

Thank you for your understanding. I look forward to connecting with you upon my return.

If you do not get a reply from me within ten working days of my return please resend your query again.

Your email will be responded to in due course.

Kind regards,

Stephanie-Anne Barnardt  
Specialist Heritage Officer (Archaeologist)  
Heritage Western Cape

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

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The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.  
If you are not the intended recipient you may not copy or deliver this message to anyone."

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23102514SB1124  
**Enquiries:** [REDACTED]  
**E-mail:** [REDACTED]  
**Tel:** [REDACTED]



Consultant: John Gribble  
[REDACTED]

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: INTERIM COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED HUGE WEF ON REMAINDER OF FARM 145 (OU DE KRAAL), REMAINDER OF FARM 147 (STINKFONTEINS BERG), REMAINDER OF FARM 172 (STINKFONTEIN), FARM 173 (DRIEHOEK), REMAINDER OF FARM 174 (PRESENTS KRAAL) AND PORTION 9 OF FARM 148 (HELPMEKAARR), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

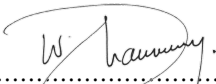
**INTERIM COMMENT:**

The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA but requires clarity on the degree to which the visual issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

**Straatadres:** Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Posbus 1665, Kaapstad, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za



**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23110807SB1124  
**Enquiries:** [REDACTED]  
**E-mail:** [REDACTED]  
**Tel:** [REDACTED]



Consultant: John Gribble  
[REDACTED]

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: FINAL COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED KHOE WEF ON PORTIONS 1, 2 AND 11 OF FARM 38 (EENDRAGT), FARM 193 AND REMAINDER OF FARM 37 (EENDRAGT), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

**FINAL COMMENT:**

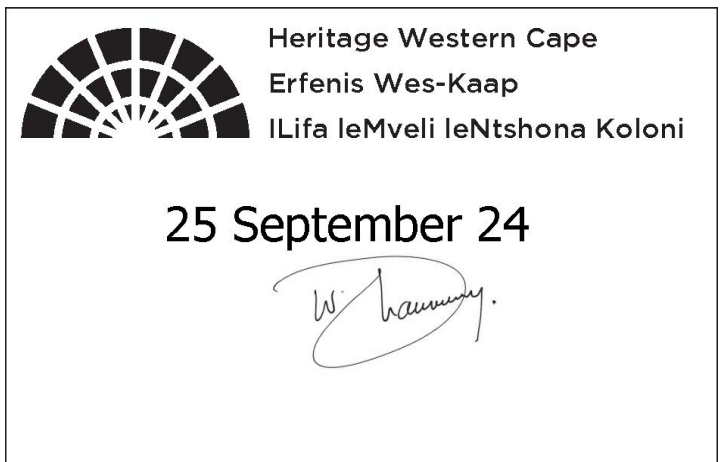
The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA, but does not support the proposed activity, given the anticipated impact of the activity upon the Cultural landscape.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
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• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za





**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Wednesday, 25 September 2024 12:17:17  
**Attachments:** [image001.png](#)

---

Hi Karen,

You have been included to the database for the EIA phase.

Kindly note I have sent Responses to your comments provided.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, September 22, 2024 7:47 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <hugokhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day Sadiya

We would like to make sure that **we have been registered now** as Interested and Affected Party of the Hugo & Khoe WEF Ref 0695823.

We previously registered on the online platform , our names and comments were not included in the Draft Assessment Report.

We own the neighbouring farm to the farm Eendrag , where the Khoe Windfarm is envisaged.

Names: Johan and Karen Kritzinger  
[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger

[REDACTED]

[REDACTED]

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Wednesday, 25 September 2024 12:17:12  
**Attachments:** [image001.png](#)

---

Hi Karen,

You have been included to the database for the EIA phase.

Kindly note I have sent Responses to your comments provided.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, September 22, 2024 7:47 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

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Names: Johan and Karen Kritzinger  
[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger

[REDACTED]

[REDACTED]

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23102514SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: INTERIM COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED HUGE WEF ON REMAINDER OF FARM 145 (OU DE KRAAL), REMAINDER OF FARM 147 (STINKFONTEINS BERG), REMAINDER OF FARM 172 (STINKFONTEIN), FARM 173 (DRIEHOEK), REMAINDER OF FARM 174 (PRESENTS KRAAL) AND PORTION 9 OF FARM 148 (HELPMEKAARR), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

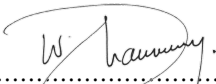
**INTERIM COMMENT:**

The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA but requires clarity on the degree to which the visual issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

**Straatadres:** Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Posbus 1665, Kaapstad, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za



**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23110807SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: FINAL COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED KHOE WEF ON PORTIONS 1, 2 AND 11 OF FARM 38 (EENDRAGT), FARM 193 AND REMAINDER OF FARM 37 (EENDRAGT), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.  
This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

**FINAL COMMENT:**

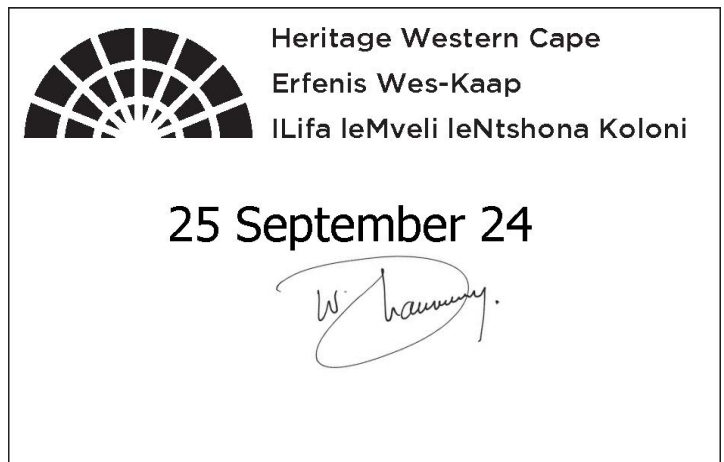
The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA, but does not support the proposed activity, given the anticipated impact of the activity upon the Cultural landscape.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
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• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za



**References:**

- 16/3/3/6/4/1/2/B2/3/1441/24 (Development Management)
- 18/2/3/2024-2025 (Development Facilitation)
- 19/3/2/4/B2/3/DDF087/23 (Pollution and Chemicals Management)
- 19/2/5/3/B2/3/WL0015/24 (Waste Management)
- 19/4/4/1/BB3 – Hugo Wind Energy Facility, De Doorns (Air Quality Management)

**Attention:** Ms Stephanie Gopaul

Environmental Resources Management Southern Africa (Pty) Ltd  
1<sup>st</sup> Floor, Great Westerford  
240 Main Road  
**Rondebosch**  
7700

[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

Dear Madam

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE UP TO 336MW HUGO WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF FARM OU DE KRAAL NO. 145, REMAINDER OF FARM STINKFONTEINS BERG NO. 147, REMAINDER OF FARM STINKFONTEIN NO. 172, FARM DRIEHOEK NO. 173, REMAINDER OF FARM PRESENTS KRAAL NO. 174 AND PORTION 9 OF FARM HELPMEEKAAR NO. 148, DE DOORNS, BREEDE VALLEY MUNICIPALITY (DFFE REF: 14/12/16/3/3/2/2515)**

1. The Draft Scoping Report ("DSR") dated December 2023, the Department's comments thereto dated 09 February 2024, and the email notification of 23 August 2024 regarding the availability of the Draft Environmental Impact Assessment ("EIA") Report, refer.
2. The Department sincerely apologises for the delay in submitting its comments on the Draft EIA Report and acknowledges that its comments will not be considered by the environmental assessment practitioner ("EAP") due to legislative timeframes for the submission of the Final EIA Report. It is however hoped that the competent authority will consider the comments during its decision-making process. Furthermore, based on the **interim comments** received from Heritage Western Cape ("HWC") dated 25 September 2024 (their reference HM/CAPE WINELANDS/ BREEDE VALLEY & LANGE BERG / TOUWSRIVER & MONTAGUE/ VARIOUS FARMS), requiring clarity "*on the degree to which the visual*

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issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment", the Department recommends that a Revised EIA Report be released for comments by registered interested and affected parties, per regulation 23(1)(b) of the EIA Regulations, 2014 (as amended). Final comments from HWC must be obtained and submitted with the Final EIA Report.

3. Please find collated comments from various directorates within the Department on the Draft EIA Report dated 23 August 2024 that was downloaded from an online link provided by the EAP and available on the EAP's website.

Directorate: Development Management (Region 1) – Ms Samornay Smidt (Email: [Samornay.Smidt@westerncape.gov.za](mailto:Samornay.Smidt@westerncape.gov.za); Tel.: (021) 483 5828):

4. Based on most of the specialists' findings, no fatal flaws were identified which should prevent the proposed Hugo wind energy facility ("WEF") from proceeding, subject to adherence to the recommended mitigation measures during all phases of implementation. This is however with the exception of the findings of the Visual Impact Assessment ("VIA") compiled by LOGIS dated July 2024 (and supported by the findings of the Social Impact Assessment') that confirmed the very high to high negative visual impact associated with the proposed Hugo WEF, and that it will only be supported from a visual perspective if the mitigation measures are implemented, the layout adjusted accordingly, and all best practice mitigation measures as provided in the VIA are implemented.
  - 4.1. The EAP's response motivated that *"adjustments to turbine placement was made based on the outcome of the visual impact assessment. Despite these efforts, some opposition persists. The turbines located in high sensitivity areas are positioned there to take advantage of the optimal wind resource. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition... Although the wind farm's visual impact on residents and tourism is high, the decision to proceed with its development is motivated by its considerable environmental and economic benefits. The project will contribute to the aforementioned frameworks, Western Cape Green Economy Strategy and Just Energy Transition and this transition is important to the country and to the future growth and sustainability as an organisation."*
  - 4.2. The responses of the EAP are noted; however, due to the very high to high negative visual impact, this Directorate **does not the support** the proposed development.
  - 4.3. it is vital that a final comment is obtained from HWC on the specialists' findings, to confirm whether the heritage, socio-economic and visual impacts associated with the proposed development have been adequately assessed and addressed, and that the recommended mitigation measures have been incorporated to ensure that the impact significance is reduced to an acceptable level. It is noted that effective mitigation to reduce the significance of the visual impact is not achievable.
5. Further to the above, the need and desirability of the project must be adequately demonstrated and motivated, especially given that the entire extent of the site falls outside the Komsberg Renewable Energy Development Zone ("REDZ"), which, from a long-term planning perspective, may not be ideal, specifically given the environmental and scenic qualities of the area.
6. Written confirmation of available capacity to provide the required services to the proposed development must be obtained from the local authority and/or relevant service provider(s).

7. The Department of Water and Sanitation must confirm whether a general authorisation or a water use licence will be required for the water uses triggered in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998).
8. Comments from all relevant organs of state should be obtained, included, and adequately addressed in the Final EIA Report.
9. The public participation process must comply with the requirements of regulation 41 of the EIA Regulations, 2014 (as amended) and proof of compliance with all the steps undertaken must be included in the Final EIA Report.

Directorate: Development Facilitation – Ms Adri La Meyer (Email: [Adri.LaMeyer@westerncape.gov.za](mailto:Adri.LaMeyer@westerncape.gov.za); Tel.: (021) 483 2887):

10. This Directorate **objects to and does not support** the proposed activities as we believe that the very high and high negative visual impacts on the area's sense of place cannot mitigate the development's low and medium (negative and positive) impacts. Sustainable development requires the consideration of all relevant factors, including that that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, be minimised and remedied; and that where the negative impacts on people's environmental rights cannot be altogether prevented, it be minimised or remedied to an acceptable level. The significance of the impact of the Hugo WEF on tourism activities was rated as medium negative with and without mitigation. In addition, several landowners raised concerns relating to the potential visual impact of the proposed Hugo WEF on the areas' sense of place and tourist-related activities. The VIA noted that the overall suitability of the area from a visual perspective is a concern, with cumulative impacts rated as very high negative, which heightens the concern. The VIA notes that owing to the sensitivity of the landscape, the high visual quality, and the potential visual impacts on sensitive visual receptors, the cumulative visual impact is not considered to be within acceptable limits. The very high to high negative visual impact during the construction and operational phases; the operational phase impact of bird collision with turbine blades, habitat alteration, and displacement that has a significance rating of high negative pre-mitigation and moderate-high negative post mitigation; and the direct collision or barotrauma of bats during the operational phase resulting in a high negative impact (pre- and post-mitigation), renders the project proposal undesirable.
11. The National Department of Environmental Affairs' Guideline on Need and Desirability (first version published in terms of section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") in 2014, and second version in 2017) requires that "*When formulating project proposals and when evaluating project specific applications, the strategic context of such applications and the broader societal needs and the public interest should be considered.*" This Directorate respectfully submit that the EAP's argument that relocating or removing turbines in high sensitivity areas "*would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition*", is not a valid argument had the applicant and EAP considered the **strategic context** of the proposed development and the broader societal needs and interests.

12. The Guideline on Need and Desirability (2017) further notes that the concept of ““need and desirability” relates to, amongst others, the nature, scale and location of development being proposed, as well as the wise use of land” (own emphasis). This Directorate believes that is not the right time nor the right place (outside of a REDZ) to have this type of land-use/activities. As such, this Directorate recommends that the competent authority adopt a **risk-averse and cautious approach**, which considers the limits of current knowledge about the consequences of decisions and actions.
13. This Directorate is willing to reconsider its comments and objections if the recommendations of the VIA can be met: *“The proposed Hugo Wind Energy Facility will only be supported from a visual perspective if the conditions listed below are implemented, the layout adjusted accordingly and all best practice mitigation measures, as provided in this report are implemented and adhered to:*
  - *Turbines labelled WTG 18, 19, 21, 23, 27 and 28 in the east be relocated outside of areas marked as mountains and tall hills (high sensitivity)*
  - *Turbines labelled WTG 1, 2, 3, 9, 10, 11 and 12 in the west be reconsidered and located outside of areas marked as mountains and tall hills (high sensitivity)*
  - *While no turbines are located within the stipulated 500 m buffer from the R318, it should be noted that the Breede Valley local municipality and the Langeberg spatial development framework considers the R318 to be a scenic route. Therefore the implementation of a 1 km buffer along this route is considered to be preferable by the visual specialist”.*
14. This Directorate's comments on the DSR noted that several solar energy facilities are approved and proposed within 30km radius of the proposed site and recommended that the Draft EIA Report provide a description why the proposed WEF is the preferred renewable energy technology alternative. Section 7.5 of the Draft EIA Report states that *“a solar electricity generation would require a much greater infrastructure footprint and water consumption (for cleaning panels) to generate the equivalent energy of the proposed WEF”*. Please indicate the average wind speed on the site against the Global Horizontal Irradiation for the site to substantiate the preferred technology alternative.
15. According to the Animal Species Specialist Assessment Report compiled by ERM Southern Africa (Pty) Ltd dated 08 August 2024, 63 records of critically endangered Riverine Rabbit were recorded at three sampling locations (HCT01, HCT02 and HCT04) placed in natural/ near-natural vegetation and recovered vegetation on previously modified land. Please confirm that no wind turbines, associated infrastructure or structures will be developed near of within this species' habitat, as this could not be ascertained from the Animal Species Specialist Assessment Report.
16. In terms of the Environmental Management Programme (“EMPr”) for the proposed Hugo WEF, both the Draft EIA Report and EMPr state that for the operational phase, *“All recommendations in the Terrestrial Animal Specialist Assessment must be adhered to”*. It is recommended that the recommendations of the Animal Species Specialist Assessment Report not included in the EMPr, be indicated/included in the EMPr for completeness.
17. General:
  - 17.1. Please confirm the width of internal and access roads. Pages 47, 89 and 231 refer to internal roads with a width of 4.5m, whereas page 85 refers to widths of 8m -10m.
  - 17.2. Reference to the Langeberg Integrated Development Plan (“IDP”) (page 154) must be replaced with Breede Valley IDP.

- 17.3. Please include in the WEF EMPr the recommendation that in the event of archaeological resources being encountered during development, work within 50m of the find must be halted and the find reported to the environmental control officer. Please further amend the Generic EMPr for substation infrastructure to specifically refer to 50m.

Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email: [Gunther.Frantz@westerncape.gov.za](mailto:Gunther.Frantz@westerncape.gov.za); Tel.: (021) 483 2975):

18. It is mentioned in the Draft EIA Report that water requirements for the proposed development may be sourced from the landowner's existing boreholes on the site or from new boreholes that will be drilled. Details, such as depth to groundwater, location of the borehole and water rights allocation, should be furnished for these borehole/s.

Directorate: Waste Management – Mr Muneeb Baderoon (Email: [Muneeb.Baderoon@westerncape.gov.za](mailto:Muneeb.Baderoon@westerncape.gov.za); Tel.: (021) 483 2965):

19. Noise, dust, spill prevention and remediation, waste management, ablution facilities' location and maintenance, fuel storage, and audit frequency are all covered sufficiently in the EMPr.
20. The EMPr states that vegetation will be removed and is addressed it in detail. The relevant municipality must be consulted regarding the suitable handling of vegetation in terms of its Organic Waste Management Plan. Vegetation may not be burned or disposed of on adjacent land.

Directorate: Air Quality Management – Mr Mzolisi Benxa (E-mail: [Mzolisi.Benxa@westerncape.gov.za](mailto:Mzolisi.Benxa@westerncape.gov.za); Tel: (021) 483 2388):

21. Dust generated from all the phases of the proposed activities must comply with the National Dust Control Regulations published in Government Notice No. R. 827 of 1 November 2013 and promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health. Although indicated in the Draft EIA Report, please also include this in the WEF EMPr.
22. Dust may be generated from cleared, bare and blasted areas, as well as from large vehicles and equipment traversing and operating on-site during the construction phase. This Directorate recommends that measures to monitor and prevent fugitive dust emissions be mitigated strictly as per the recommendations stipulated in the EMPr.
23. Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013.
24. Large vehicles traversing on-site, machinery being used, as well as wind turbine generators may cause significant noise; these activities may become a noise nuisance and/or disturbance to the surrounding communities. The Draft EIA and Environmental Noise Impact Assessment compiled by Enviro-Acoustic Research cc dated 21 May 2024 indicate that noise sensitive reception ("NSR") H-13 and NSR H-6 will



experience greater noise impacts during the construction phase, with NSR H-6 being the most affected during the operational phase, as outlined in the reports.

- 24.1. Measures to monitor and prevent noise nuisance and disturbance must be strictly implemented as per the EMPr.
- 24.2. The applicant must explore long-term noise control strategies for NSR H-6 during the operational phase (e.g. the installation of sound barriers, adjusting operational practices to reduce noise, etc.).
- 24.3. Regular noise monitoring must be undertaken to ensure compliance with acceptable noise levels during both the construction and operational phases.
  
25. Potential air emissions will be in the form of dust pollution from construction vehicles and equipment operating on-site during the construction and operational phases. All potential air pollutants on site need to be monitored and if causing significant emissions, must be mitigated strictly as per the recommendations stipulated in the Draft EIA Report and EMPr.
  
26. Please note that the abovementioned recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by this Directorate should in no way be regarded as an indication or confirmation that additional information or documents will not be requested.
  
27. The applicant is reminded of its "*general duty of care towards the environment*" as prescribed in section 28 of the NEMA, 1998 which states that "*Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.*"

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

*pp* **HEAD OF DEPARTMENT**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Letter signed by:

**Thea Jordan**

Director: Development Facilitation

**Date: 26 September 2024**

CC: (1) Ms Azrah Essop (DFFE)  
(2) EIA Admin (DFFE)

Email: [REDACTED]  
Email: [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)  
**Date:** Thursday, 26 September 2024 16:55:42  
**Attachments:** [image003.png](#)  
[2024 Sept 26 - Draft EIA Report for the proposed 336MW Hugo WEF near De Doorns.pdf](#)

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan  
Pr. Pl. (A/1237/2002)  
**Director: Development Facilitation**  
Department of Environmental Affairs and Development Planning  
Western Cape Government  
11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000



Be 110% Green. Read from the screen.

Should you not be able to contact the number above, please call +27 (0)21 483 4091 between 07:30-16:00.

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 23, 2024 15:32

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com). [Learn why this is important](#)



Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town

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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

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Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE

23 Augustus 2024

### KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 23 August 2024 15:33:15

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You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Goeie dag. Ek is tans met verlof en sal weer Vrydag 30 Augustus terug wees op kantoor.  
kontak asb die volgende persone by die tak: [REDACTED] of stuur 'n epos na:

[REDACTED]  
Baie dankie

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities; Sadiya Salie](#)  
**Cc:** [REDACTED]  
**Subject:** Hugo WEF Draft EIA: SABAA response  
**Date:** Sunday, 25 August 2024 14:26:12

---

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-dejar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-dejar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

*Website: [www.sabaa.org.za](http://www.sabaa.org.za)*



# Volume I: Draft Environmental Impact Assessment Report

Proposed Khoe Wind Energy Facility  
and associated Infrastructure, Western  
Cape Province

**PREPARED FOR**

DFFE Reference:

14/12/16/3/3/2/2516

Draft for Public Comment

**DATE**

23 August 2024

**REFERENCE**

0695823



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The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.

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DOCUMENT SUBTITLE	Proposed Khoe Wind Energy Facility and associated Infrastructure, Western Cape Province
PROJECT NUMBER	0695823
Date	23 August 2024
Version	2.0
Author	Sadiya Salie, Stephanie Gopaul
Client name	FE Hugo & Khoe (Pty) Ltd

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VERSION	REVISION	AUTHOR	REVIEWED BY	ERM APPROVAL TO ISSUE		COMMENTS
				NAME	DATE	
1.0	00	Sadiya Salie, Stephanie Gopaul	Stephen Burton	Stephanie Gopaul	05-08-2024	Draft for Client Consideration
2.0	01	Sadiya Salie, Stephanie Gopaul	The Energy Team	Stephanie Gopaul	21-08-2024	Draft for Public Domain

SIGNATURE PAGE

# Volume I: Draft Environmental Impact Assessment Report

Proposed Khoe Wind Energy Facility and associated Infrastructure,  
Western Cape Province

0695823



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**Stephanie Gopaul**

Partner and Registered EAP

---

**Name Surname**

Job title

---

ERM Southern Africa (Pty) Ltd.

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## ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AQA	Air Quality Act
BESS	Battery Energy Storage System
BGWMA	Breede-Gouritz Water Management Area
CA	Competent Authority
CARA	Conservation of Agricultural Resources, 1983 (Act No. 43 of 1983)
CBA	Critical Biodiversity Area
CBD	Convention on Biological Diversity
CHSSP	Community Health, Safety and Security Plan
CR	Critically Endangered
CRM	Collision Risk Model
dB	Decibel
DD	Data Deficient
DFFE	Department of Forestry, Fisheries and the Environment (National)
DMRE	Department of Mineral Resources and Energy
DoE	Department of Energy

<b>Acronyms</b>	<b>Description</b>
DHSWS	Department of Human Settlement, Water and Sanitation
EN	Endangered
EAP	Environmental Assessment Practitioner
ECA	Environment Conservation Act, 1989 No. 73 of 1989)
EGI	Electricity Grid Infrastructure
EI	Ecological Importance
EIA	Environmental Impact Assessment
EIS	Ecological Importance and Sensitivity
EMPr	Environmental Management Programme
ENIA	Environmental Noise Impact Assessment
ESA	Ecological Support Area
ESA	Early Stone Age
ESMP	Environmental and Social Management Plan
EWT	Endangered Wildlife Trust
FSR	Final Scoping Report
GBIF	Global Biodiversity Information Facility
GHG	Greenhouse Gas
GNR	Government Notice Regulation
HIA	Heritage Impact Assessment
HSM	Habitat Suitability Model
I&AP	Interested and Affected Party
IDP	Integrated Development Plan
IEM	Integrated Environmental Management
IPP	Independent Power Producer
IRP	Integrated Resource Plan
kV	Kilovolt
kWh	Kilowatt Hours
LC	Least Concern
LM	Langeberg Municipality
LN	Listing Notice
LSA	Late Stone Age
MSA	Middle Stone Age
MW	Megawatt
NCCAS	National Climate Change Adaptation Strategy
NCR	Noise Control Regulations

<b>Acronyms</b>	<b>Description</b>
NDP	National Development Plan
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NFEPA	National Freshwater Ecosystem Priority Area
NID	Notice of Intent to Develop
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NPAES	National Protected Area Expansion Strategy
NSR	Noise Sensitive Receptor
NT	Near Threatened
NWA	National Water Act, 1998 (Act No. 36 of 1998)
O&M	Operation and Maintenance
PAOI	Project Area of Influence
PES	Present Ecological State
pW	pico Watt
PWL	Sound Power Level
PPP	Public Participation Process
QGIS	Quantum Geographic Information System
RD	Red Data
REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
REC	Recommended Ecological Category
REDz	Renewable Energy Development Zone
REEA	Renewable Energy EIA Application
REL	Red List of Ecosystems
S&EIA	Scoping and Environmental Impact Assessment
SABAP2	The Southern African Bird Atlas Project
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SANRAL	South African National Roads Agency Limited
SANS	South African National Standards
SCADA	Supervisory Control and Data Acquisition
SDF	Spatial Development Framework
SEA	Strategic Environmental Assessment
SEF	Solar Energy Facility
SDOD	Shut-down-on-demand
SIA	Social Impact Assessment

<b>Acronyms</b>	<b>Description</b>
SR	Scoping Report
SSC	Species of Conservation Concern
ToR	Terms of Reference
UNFCCC	United Nations Framework Convention on Climate Change
VM	Virtual Museum
VP	Vantage Point
VU	Vulnerable
WCCCRS	Western Cape Climate Change Response Strategy
WDM	Winelands District Municipality
WULA	Water Use License Application

## PROJECT DETAILS

<b>DFFE Reference</b>	<b>14/12/16/3/3/2/2516</b>		
ERM Reference	0695823 Khoe Wind Energy Facility		
Project Title	Khoe Wind Energy Facility and associated Infrastructure		
EAP	Stephanie Gopaul	Environmental Resource Management Southern Africa (Pty) Ltd	
Consultant	Sadiya Salie	Environmental Resource Management Southern Africa (Pty) Ltd	
Specialist Team	Soil, Land Use and Agricultural Potential	Johann Lanz	Independent Consultant
	Heritage and Palaeontology	John Gribble	ACO Associates cc
	Noise	Mornè De Jager	Enviro Acoustic Research
	Visual/ Landscape	Lourens du Plessis	LOGIS
	Traffic	Victor de Abreu and Reabetswe Mokomele	SMEC
	Biodiversity	Dr Owen Davies	ERM
	Socio-Economic	Tony Barbour	Independent Consultant
	Avifauna	Dr Rob Simmons	Birds and Bats Unlimited
	Bats	Stephanie Dippenaar	Stephanie Dippenaar Consulting trading as EkoVler
	Freshwater and Wetlands (Aquatics)	Dr Brian Colloty	EnviroSci
Project Applicant	FE Hugo & Khoe (Pty) Ltd		
Report Status	EIA Report – Draft for public comment		

## PUBLIC PARTICIPATION DETAILS

The Draft Environmental Impact Assessment (EIA) Report, with the required application form, has been submitted to the Department of Forestry, Fisheries and the Environment (DFFE), acting as the Competent Authority (CA).

Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Report available for public review and comment from the 23 August 2024 until the 23 September 2024 (both days inclusive), at the following locations.

Location	Physical Address
Hard Copy Location	
De Doorns Public Library	7 Station Road, De Doorns, Western Cape, South Africa
Electronic copy locations	



Location	Physical Address
ERM Website	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
Electronic Transfer	Interested and Affected Parties (I&APs) may request for copies to be shared via a One Drive folder.
Hard copies available upon request	

## EXECUTIVE SUMMARY

FE Hugo and Khoe (Pty) Ltd is applying for an Environmental Authorisation to construct and operate the Khoe Wind Energy Facility (WEF) with a capacity of up to 232 MW. Additional ancillary infrastructure to the WEF would include underground and above-ground cabling between project components, onsite substation/s, Battery Energy Storage Systems (BESS), foundations to support turbine towers, internal/ access roads linking the wind turbines and other infrastructure on the site, and permanent workshop area and office for control, maintenance and storage. As far as possible, existing roads will be utilised and upgraded (where needed). The proposed development is located near the De Doorns town in the Western Cape Province. Hereafter, the proposed Khoe WEF as well as its associate infrastructure will be referred to as the "proposed development".

One additional WEF, namely Hugo is concurrently being considered in the surrounding properties and is assessed by way of separate impact assessment processes contained in the 2014 Environmental Impact Assessment (EIA) Regulations (GN No. R982, as amended) for listed activities contained in Listing Notices 1, 2 and 3 (GN R983, R984 and R985, as amended).

It is important to note that the grid connection will not form part of this S&EIA process. It will, however, be assessed in a separate application process at a later stage.

## SITE LOCATION AND PROPOSED DEVELOPMENT DESCRIPTION

The proposed Khoe WEF is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

The Khoe WEF project site is proposed to accommodate infrastructure (as detailed below), which will enable the WEF to supply a contracted capacity of up to 232 MW. The development footprint of the site will be up to 85 ha, dependent on the sensitivities in the area. The proposed development will comprise of the following infrastructure:

- Up to 29 wind turbines with a maximum tip height of up to 250 m and a rotor diameter of up to 200 m.
- Each turbine will have a capacity of up to 8 MW
- A transformer at the base of each turbine.
- Concrete turbine foundations approximately up to 1,000 m<sup>2</sup> per turbine
- Each turbine will have a hardstand area of approximately up to 7,500 m<sup>2</sup> per turbine
- Temporary laydown areas (with a footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area.
- Battery Energy Storage System (BESS) (with a footprint of up to approximately 5 ha).
- Cabling between the turbines, to be laid underground where practical.
- One on-site substations of up to 2.5 ha in extent to facilitate the connection between the WEF and the electricity grid.
- Access roads to the site and between project components inclusive of stormwater infrastructure. A 13.5 m road corridor may be temporarily impacted upon during construction and rehabilitated to 8m wide after construction.
- A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha).

- Operation and Maintenance (O&M) buildings (with a combined footprint of up to 1 ha) including a gate house, security building, control centre, offices, warehouses, a workshop and visitor's centre.

The project is expected to have a 20-25-year life span, but with possible refurbishment this could be extended if deemed feasible at the time.

### ENVIRONMENTAL LEGISLATIVE REQUIREMENTS

The EIA Regulations 2014 published in Government Notice (GN) No. R. 982 as amended provide for the control of certain Listed Activities. These activities are listed in GN No. R. 983 (Listing Notice 1 - Basic Assessment), R. 984 (Listing Notice 2 - Scoping & EIA Process) and R. 985 (Listing Notice 3 - Basic Assessment) of 4 December and are prohibited to proceed until environmental authorisation has been obtained from the competent authority, in this case, the Department of Environment, Forestry and Fisheries (DFFE).

On 7 April 2017 in Government Gazette 40772 the Minister of Environmental Affairs published amendments in Government Notice (GN) Number R. 326 to the Environmental Impact Assessment (EIA) Regulations of 2014 that provide for the control of certain Listed Activities. These activities are listed in Listing Notice 1 (GN R327), Listing Notice 2 (GN R325) and Listing Notice 3 (GN R324). Activities triggered within Listing Notice 1 and 3 require Basic Assessment; activities within Listing Notice 2 require a Scoping & EIA Process.

As the proposed Khoe WEF and associated infrastructure triggers Activities in Listing Notices 1 - 3 and does not fall within a Renewable Energy Development Zone (REDZ), a full Scoping and EIA (S&EIA) process has been followed.

Listed Activities applicable to the proposed Khoe WEF and associated infrastructure are presented in the table below. All potential impacts associated with these Listed Activities have been considered and assessed in this S&EIA process

**TABLE 0.1 APPLICABLE LISTED ACTIVITIES IN TERMS OF THE NEMA, AS AMENDED**

Listing Notice	Activities
LN 1 GN R327 <sup>1</sup>	11(i); 12 (ii, a, c); 14; 19 (i); 24 (ii); 28 (ii); and 56 (i)(ii).
LN 2 GN R325 <sup>2</sup>	1; and 15.
LN 3 GN R324 <sup>3</sup>	4 (i)(ii)(aa); and 18(i)(ii) (aa)

Depending on the final design of the Khoe WEF and associated infrastructure, there may be a requirement for the following additional permits / authorisations:

- Biodiversity Permits in terms of the National Environmental Management: Biodiversity Act (Act No 10 of 2004) (NEMBA);

<sup>1</sup> "Listing Notice 1 of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017."

<sup>2</sup> "Listing Notice 2 of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017."

<sup>3</sup> "Listing Notice 3 of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017."

- Waste Management License/s as required by the NEMA, Waste Act, 2008 (Act No. 59 of 2008);
- Water Use Licenses as required by the National Water Act, 1998 (Act No. 36 of 1998) (NWA);
- Obstacle approval- an obstacle assessment will be undertaken prior to construction; and
- Heritage License in term of the National Heritage Resources Act 25 of 1999.

These permits will be applied for should the project be authorised and be selected as a preferred bidder.

### ENVIRONMENTAL IMPACT ASSESSMENT PHASE

The Final Scoping Report (FSR) (ERM, April 2024) presented and assessed the initial proposed wind turbine layout and associated infrastructures of the Khoe WEF and its associated infrastructure. In May 2024, the DFFE accepted the FSR (14/12/16/3/3/2/2516). The results of the specialists' scoping assessments, DFFE comments on the FSR, and other technical and financial constraints for the proposed development site were taken into consideration and a revised 'preferred layout' was produced.

This EIA report presents and assesses the impacts associated with the preferred layout of the Khoe WEF.

### SUMMARY OF SPECIALIST ASSESSMENTS RESULTS

Each of the specialist assessments followed a systematic approach to the identification and assessment of impacts, with the principal steps being:

- Description of existing environment / baseline conditions;
- Prediction of likely potential impacts, including cumulative impacts (both positive and negative);
- Assessment of likely potential impacts (positive and negative);
- Identification of appropriate mitigation measures; and
- Assessment of residual (potential) environmental impacts.

The individual assessment methodologies and baseline descriptions are set out in this report. The approaches are in line with the legal requirements and industry best practice guidelines and makes use of the experience and expertise of the EAP and the specialists.

Studies have been completed to quantify possible impacts and magnitude of impacts related to but not limited to the soil, land, avifauna, visual/landscape, fauna, flora, aquatic, terrestrial biodiversity, heritage, noise, socio-economic and traffic and transportation and includes measures to mitigate and reduce the significance of impacts.

### SOIL, LAND USE AND AGRICULTURAL POTENTIAL

The site is in an area where there is limited crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore limiting to rain-fed cropping. The dominant soils are shallow soils on underlying weathered bedrock of the Glenrosa, Hutton, Swartland, and Mispah soil forms. There is a high proportion of rock outcrops. The soils are limited in their agricultural potential by shallow depths, rockiness, and low water holding capacity and are unsuitable for crop production as a result,

except in some lower-lying areas where accumulation leads to deeper soils, and limited cropping is practised.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In the case of wind farms, the amount of land excluded from agriculture is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has. Furthermore, wind farms have both positive and negative effects on the production potential of land, and it is the net sum of these positive and negative effects that determines the extent of the change in future production potential.

From an agricultural impact point of view, it **is recommended that the proposed development be approved.**

### FRESHWATER AND WETLANDS (AQUATICS)

The assessment report was undertaken to meet the criteria to fulfil a Specialist Verification Assessment Report as the proposed site is located within an area rated as very high sensitivity by the DFFE Screening Tool.

The site is situated within the North Langeberg Sandstone Fynbos, South Langeberg Sandstone Fynbos and Matjiesfontein Shale Renosterveld vegetation units, all forming part of the Die Brak river catchment. These vegetation units are not listed as a Threatened Ecosystem, by NEMA due to it being considered Endangered. A small southern portion of the site is located in the Koo River catchment however only one drainage feature associated with this catchment is located within the study area farm portions.

The area is characterised by low lying drainage areas with riverine and drainage line systems, valley bottom wetland areas, seepage wetlands associated with several of the larger dams and one small depression. Further the area has seen a high degree of transformation in the form of cultivation areas, grazing, as well as the creation of several farm dams, roads and tracks. Of significance is the fact that most of the watercourses have either been converted into herring bone drain features or bermed to increase flows into downstream dams. This has then led to riverbed incision and the formation of the alluvial fans observed, i.e. sedimentation of low-lying downstream areas due to this and loss of vegetative cover.

Coupled to the aquatic delineations, information was collected on potential species that could occur within the watercourses, especially any conservation worthy species (Listed or Protected) but noting these were mostly terrestrial in nature and associated with the high level of disturbance.

Using the baseline description, aquatic features were identified, then categorised into one of number pre-determined sensitivity categories to provide protection and/or guide the layout planning processes. The sensitivity ratings of High (No-Go) to Low were determined through an assessment of the habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems) and this is considered acceptable since these areas are already disturbed.

In summary, the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. The loss of irreplaceable aquatic habitat and/or important biota is highly unlikely, i.e. Very High sensitivity or No-Go areas. This also includes the spanning of a

functioning drainage line, which would not be seen as problematic, if suitable stormwater management and drainage from the area of the site is provided. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

None of the proposed project alternatives (buildings) have a direct impact on the aquatic environment, making use of the existing provincial / district road network thus either option is deemed acceptable.

The significant impacts are associated with the access road crossings river systems. These systems are generally in a modified state (existing road), but still provide some habitat and important ecological functions.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.

## TERRESTRIAL BIODIVERSITY

The site is predominantly classified as Low Sensitivity by the Department of Forestry, Fisheries and the Environments (DFFE) Online Screening Tool (ST), while remaining areas are classified as Very High Sensitivity. This is due to the intersection of the PAOI with various important biodiversity areas including Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and Freshwater Ecosystem Priority Areas (FEPA) associated with the Langeberg-Wes Mountain Catchment.

Up to 586 animal species are potentially present on site, of which 40 are Species of Conservation Concern (SCC). However, some of the occurrence data is likely collected from individuals reintroduced to game reserves. Up to 1,782 plant species are potentially present on site, of which 48 are confirmed SCC according to the DFFE Online ST. Given the high number of plant species potentially present it is likely the number of plant SCC is greater than that provided by the DFFE Online ST. The proposed development area includes three vegetation types that are listed as Least Concern (LC) by the Red List of Ecosystems (RLE), and intersects in some areas with CBAs and ESAs.

The anticipated impacts include vegetation clearing, loss of individual SCC, alien invasive species, soil erosion, chemical contamination, fire, reduced and restricted movement, altered flow regimes, disturbance and/or displacement, and mortality. Cumulative impacts include those that affect broad-scale ecological processes. With adherence to the prescribed mitigation measures opportunities exist to promote conservation efforts, community engagement and education, and local environmental monitoring and research.

It is the Specialists opinion that the DFFE Online ST Assessment of Very High Sensitivity in the Terrestrial Biodiversity Theme for some areas is accurate. High sensitivity areas are predominantly CBAs and an area attributed to high floral sensitivity. Remaining areas are listed as Medium Sensitivity or Low Sensitivity.

**It is the Specialists opinion that the proposed Khoe WEF may be considered for development, provided all mitigation measures are adhered to.**

## FAUNAL

Two non-avian SCCs were identified as relevant sensitivity features in the animal species theme output of the Screening Tool, namely the Least Concern Caledon Copper (*Aloeideas caledoni*, a butterfly) and Critically Endangered Riverine Rabbit (*Bunolagus monticularis*), both listed as 'Medium' sensitivity indicating the potential to occur on the study site. Two additional non-avian animal SCCs were determined relevant to the proposed development, namely the Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*).

A camera trap survey was conducted at 11 sampling locations (two on-site and nine off-site) in and around the proposed development area between 17 February 2022 and 23 December 2022, resulting in 1,832 camera trap days. A total of 2,778 independent records of 3,269 animals representing 66 species were recorded across the broader area. No Riverine Rabbit were recorded present on the Khoe WEF site, but were regularly recorded during simultaneous monitoring in the broader area. Grey Rhebok were confirmed on site and while Caledon Copper and Leopard were not confirmed on site, both were assumed to be present for the purposes of the assessment.

The animal sensitivity of the site was mapped through consideration of existing impacts, potential impacts of the proposed development and important ecological processes that *should* be acting across the site and broader area. Conservation objectives for all animal SCCs relevant to the project highlight the importance of dispersal corridors across the landscape to maintain genetic diversity and long-term studies on population dynamic. Agricultural activity across the site has modified the majority of preferred Riverine Rabbit habitat and obstructed potential animal movement corridors. The proposed development presents an opportunity to provide a land-use alternative to agricultural activity that is more compatible with conservation objectives for animal SCCs. Impacts can be minimized through in-situ biodiversity rehabilitation, specifically through the restoration of strategic, currently modified areas to improve habitat connectivity for animal SCCs relative to the present condition.

The **proposed development is acceptable from an animal perspective** on condition that strategic areas of existing agricultural land be appropriately rehabilitated.

## FLORA

The site is classified as High Sensitivity with areas characterized as Medium and Low Sensitivity by the DFFE Online Screening Tool (ST). Up to 1,782 plant species are potentially present on site, of which 48 are listed as SCC by the DFFE Online ST. Given the high number of species potentially present it is likely the number of SCC is greater than that provided by the DFFE Online ST. The proposed development area includes three vegetation types that are listed as LC by the RLE, and intersects in some areas with CBA and ESA.

The anticipated impacts include vegetation clearing, loss of individual SCC, alien invasive species, soil erosion, chemical contamination, and fire. Cumulative impacts include those that affect broad-scale ecological processes and conservation objectives. With adherence to the prescribed mitigation measures opportunities exist to promote conservation efforts, community engagement and education, and local environmental monitoring and research.

It is the Specialists opinion that SCC are likely present on site, therefore the DFFE Online ST Assessment of High Sensitivity in the Plant Species Theme for some areas is accurate. High sensitivity areas are predominantly those listed as CBAs. All other areas are either Medium Sensitivity or Low Sensitivity.

**It is the Specialists opinion that the proposed Khoe WEF may be considered for development, provided all mitigation measures are adhered to.**

## AVIFAUNA

The main surveys were conducted over a 12-month period in 2022-2023 and undertaken simultaneously with surveys of another proposed wind farm site at Hugo. The Khoe site is approx. 4,113 ha in size and comprised mainly agricultural areas with farm dams centrally placed and small ridges to the north and east.

The DFFE Screening Tool (Animal Theme) classified the area as of High Sensitivity (based on the presence of four Red Data species). Birdlife South Africa's national Avian Sensitivity Map suggests low to medium-high sensitivity for birds and Wind Energy Facility. Inspection of the national bird atlas data set (SABAP 2) including our own species records added an additional Red Data species (Lanner Falcon *Falco biarmicus*) and other collision-prone species. We, thus, concur with the Screening Tool's assessment that the site is of High Sensitivity, and the data and models that follow allow us to reduce risk by constructing a detailed spatial picture of the risks to the Priority birds present.

Over four seasons, 1,159 flights of 16 Priority species were recorded in 465 hours of observations across the proposed Khoe farm. The Collision Risk Modelling (CRM) based on a new (New et al. 2015) formulation of the previous Band model calculates risk classes across all areas of the farm based on the volume of flights, flight heights and their duration, and incorporates an assessment of topographic and environmental factors.

Of the 16 Priority species, eight Red Data species and eight Least Concern species were recorded and mapped.

The highest risk areas (Class 5.0 and above) were strongly clumped in the eastern and northern sections, due mainly to high flight rates of Blue Cranes and Verreaux's Eagles. The risky threshold chosen (Class 5.0+) encompassed more than 75% of risky flights for two species (Verreaux's Eagles and Black Harrier), and 50% of such flight for six of the seven species. The areas are classified as too risky for development and allocated as No-Go areas. The resulting identification of risk across spatially explicit areas indicated the north-eastern and central areas were high risk for Red Data species and the central and northern areas were high risk for Least Concern species. This resulted in 66.6% of the area designated for Khoe Wind Energy Facility as No-Go for turbines. Of the 29 proposed turbines, all avoid the riskiest areas predicted by the CRM. Note that some of them fall within the 3.7 km Verreaux's Eagle circular nest buffer, but no risk areas were identified for eagles within the sliver of the buffer inside the south-west boundary. For this reason, we favoured the CRM results as more precise than the coarse buffer approach.

These high-risk class areas covered 67% of the area, leaving 33% of the area classified as medium- or low-risk to the Priority birds recorded, mainly in the south-west of the study site. Turbines in areas classified as risk Class 4.5 require one-tier of mitigations: either patterned-blades or shut-down-on-demand (SDOD) – automated, or human-led. Those in Class 4.0 require no extra mitigation. Should one Critically Endangered or Endangered bird be killed per



year at any turbine then an additional tier of mitigation must be applied. For Other Red data species, the threshold triggering mitigation is 1 to 2 fatalities depending on the species.

According to available information consulted during this study to date, there are no fatal flaws which should prevent the wind farm from proceeding (assuming all mitigation measures will be implemented) from an avifaunal sensitivity perspective.

## BATS

Data from passive monitoring systems, fieldwork sessions, roost surveys, and a desktop study informed this report. Six static SM4BAT systems were deployed within the project site, with four systems located near-ground at 10 m, to represent the various biotopes, and two on the met mast, within the sweep of the turbine blades, at 50 m and 100 m.

The proposed study area falls within the Fynbos Biome, with three main vegetation types being represented on site. There are several areas of conservation value in the region of the proposed Khoe WEF, but none of these borders the proposed wind farm. The nearest registered reserve, the Bokkeriviere Nature Reserve, is situated approximately 20 km in a north-westerly direction. Two Mountain Catchment Areas are situated very close to the proposed Khoe WEF site, the Matroosberg Mountain Catchment Area, approximately 5 km from the border of the Khoe WEF, and the Langeberg-Wes Mountain Catchment Area, approximately 15 km from the border of Khoe WEF.

Of the 12 species with distribution ranges that include the proposed development area, three have a conservation status of Near Threatened in South Africa and one Vulnerable, while two have a global conservation status of Near Threatened. According to the likelihood of fatality risk, as indicated by the latest pre-construction bat guidelines six species, namely Natal long-fingered bat, Egyptian free-tailed bat, Roberts's flat-headed bat, Cape roof bat and the two fruit bats) have a high risk of fatality, while Temminck's myotis bat has a medium-high risk and the endemic Long-tailed house bat has a medium risk of fatality.

Passive monitoring data for the period between 30 December 2022 and 7 March 2024 is included in this report. *L. capensis* was the most abundant species recorded (55%), while 37% of the calls were of those bats like the high-flying Egyptian free-tailed bat, which has a narrow wing morphology adapted for open air space. 4% of the activity recorded was similar to Natal long-fingered bat, 3% was Roberts's flat-headed bat, and a statistically insignificant number of the endemic Long-tailed house bat.

The average monthly activity shows that bats are generally most active during the summer months, followed by autumn and spring, with reduced activity during the winter months. Peak activity was recorded in March, November and December 2023, with general high activity from February to May 2023, and again from October 2023.

Due to the general high bat activity on site, the development areas were classified as medium sensitive. It will therefore be necessary to mitigate turbines early in the operational phase. No turbine components are allowed in high-sensitivity zones. At present no turbines are positioned in medium-high sensitivity zones either, but if turbines are placed on medium-high sensitivity zones, curtailment will have to be applied after the testing of those turbines, when they start to turn.

The overall potential negative impact of the proposed Khoe WEF on bats, combined for all the development phases, is predicted to be moderate negative without mitigation, while low negative with mitigation.

Based on the findings of the 14 months of pre-construction bat monitoring undertaken at the proposed Khoe WEF project site, the bat specialist is of the opinion that no fatal flaws exist which would prevent the construction and operation of this wind farm, but bat activity is high, and mitigation measures should be adhered to. The EA may be granted, subject to the implementation of the recommended mitigation measures.

### HERITAGE AND ARCHAEOLOGY

The palaeontological assessment indicates that the proposed Khoe WEF is underlain by several coastal to shallow marine formations of the Table Mountain and Bokkeveld Groups of the Cape Supergroup, of Early to Middle Devonian age (c. 410 – 390 Ma), some of which have fossils preserved within them.

According to SAHRA's palaeo-sensitivity map, the Khoe WEF footprint is in an area of generally very high or high palaeontological sensitivity. However, a palaeontological assessment for the adjacent proposed Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual palaeontological sensitivity of that project area is much lower than indicated on the SAHRA map.

Based on experience and the lack of any previously recorded fossils from the area, Bamford (2024) indicates that it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary and there is a moderate to small chance that fossils may occur in the mudstones of the Ceres Subgroup or in the Table Mountain and Bokkeveld Groups bedrock. This potential is very variable and is negatively affected by the folding and tectonic deformation of these formations within the Cape Fold Belt mountains.

Based on these reports, it was assumed prior to the TerraMare Archaeology site visit that Stone Age resources in and around the Khoe WEF would be rare. This was confirmed by the site visit which found virtually no evidence, apart from occasional, isolated stone artefacts, of archaeological sites within the area that will form part of the Khoe WEF development footprint.

This assessment has found that the area identified for the proposed Khoe WEF is a heritage environment of variable sensitivity but that significant impacts on palaeontological and archaeological resources arising from the project are unlikely and no fatal flaws have been identified. Impacts to the cultural landscape are expected to be significant, but these can be reduced through the implementation of suitable mitigatory measures. If the project were not implemented, the site would stay as it currently is with a neutral impact significance.

Despite the impacts to the cultural landscape, it is expected that mitigation measures will allow impacts to be managed.

It is our considered opinion, therefore, that the proposed Khoe WEF may be authorised, but subject to the recommendations contained within this report.

## PALEONTOLOGY

The project lies in the central part of the Cape Supergroup rocks where the Early and Middle Devonian rocks of the Ceres Subgroup (Bokkeveld Group, Cape Supergroup) are well represented.

A palaeontology Impact Assessment (PIA) was commissioned as part of the HIA (Bamford, 2024).

The (PIA) makes the following recommendation:

- Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. There is a moderate to small chance that fossils may occur in the mudstones, of the Ceres Subgroup that lie below the soils or in rocky outcrops.
- Therefore, a Fossil Chance Find Protocol should be added to the EMP. If fossils are found by the environmental officer, or other responsible person once excavations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach. It should be noted that soil cover is likely to obscure any fossils.

The impact on the palaeontological heritage would be moderate to low but the impact can be mitigated by a palaeontologist or ECO collecting and removing any important fossils. There are therefore no objections on paleontological heritage grounds to authorisation of the proposed development.

## VISUAL/LANDSCAPE

Overall, the significance of the visual impacts associated with the proposed Khoe Wind Energy Facility is expected to be very high to high as a result of the generally undeveloped character of the landscape and its inability to absorb changes of this magnitude. Additionally, the facility would be visible within an area that contains certain sensitive visual receptors who already consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors include people travelling along the R318 and secondary roads, as well as, residents of rural homesteads and tourists passing through or holidaying in the region.

Night time impacts have also been assessed whereby it was determined that the significance of lighting (particularly aircraft warning lighting mounted on the turbines) on the nightscape would be high post mitigation. As discussed, the greater environment is largely natural in character with limited built infrastructure. Unblemished night skies are a key attribute to the study areas sense of place and night time visual character. Light sources in the area are limited to isolated farm and homesteads and fleeting light from passing cars travelling along the R318 and other secondary roads. Therefore, the introduction of new light sources into a relatively dark night sky, will have an impact on the visual quality of the study area at night.

According to the Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning (DEA&DP) Guideline for Involving Visual and Aesthetic Specialists in the EIA Process (Oberholzer, 2005), the criteria that determine whether or not a visual impact constitutes a potential fatal flaw are categorised as follows:

1. Non-compliance with Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites.
2. Non-compliance with conditions of existing Records of Decision.

3. Impacts that may be evaluated to be of high significance and that are considered by the majority of the stakeholders and decision-makers to be unacceptable.

In terms of the above and to the knowledge of the author, the proposed development is compliant with all Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites, as well as, conditions of existing Records of Decisions. However, it must be noted that as per the *Guideline for the Management of Development on Mountains, Hills and Ridges of the Western Cape (April 2002)*, development on the crest of a mountain, hill or ridge will be strongly discouraged. Of the 29 turbines proposed, 24 are located on mountains and tall hills identified as having a high visual sensitivity and where development in these buffers is not considered best practice and should be avoided. Owing to the extremely close proximity of sensitive visual receptors to the proposed Khoe WEF, turbines placed on elevated terrain, such as mountains and tall hills, exacerbate the already very high visual impact on these receptors. As such, turbines placed on these areas will not be supported.

Furthermore, with regards to point 3 above, it has been established through the course of this assessment that many objections to the proposed Khoe WEF have been raised by stakeholders within the region, as communicated by the EAP and social impact specialist. Based on the objections received and the overall lack of support for wind energy facilities in the region, the author is of the opinion that the overall very high to high significance of the visual impacts anticipated for the proposed Khoe WEF are considered by the majority of the stakeholders and decision-makers to be unacceptable and that the statistical majority of objecting stakeholders has been exceeded. If evidence to the contrary surfaces during the progression of the development application, the specialist reserves the right to revise the statement below.

In light of the above assessment and the outcomes determined thereof, the author is of the opinion that the visual impacts associated with **the proposed Khoe Wind Energy Facility has exceeded acceptable limits and is considered fatally flawed from a visual perspective.** The author therefore does not support the authorisation of this project owing to the following:

- The overall very high to high visual impacts;
- The very high cumulative impact;
- Majority of the turbines are located on mountain and tall hills rated as having a high sensitivity;
- Majority of the stakeholders are against the project;
- The proposed Khoe WEF is located in significant proximity to sizeable established and planned tourism operations;
- Turbines are located within the buffer zones of protected areas and private nature reserves; and
- The proposed Khoe WEF will result in significant loss of sense of place and uniqueness of landscape character.

#### **EAP Motivation**

According to the visual assessment, landowners/receptors and travelers may view the turbines in a negative light, for others, wind turbines are not regarded as visually intrusive. The perception of what constitutes a negative visual impact is therefore personal and subjective. We have considered the responses from all Interested and Affected Parties (I&APs). In response, detailed simulations and visualisations were undertaken from various guesthouses to

understand and address potential visual impacts. Adjustments to turbine placement was made based on the outcome of the visual impact assessment. Despite these efforts, some opposition persists.

The turbines located in high sensitivity areas are positioned there to take advantage of the optimal wind resource. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition.

I would also like to highlight the proposed Exemia game reserve (where the objections persist). Currently, the proposed campsite area remains undeveloped, and no concrete plans have been provided, so it is considered a future intent project.

Although the wind farm's visual impact on residents and tourism is high, the decision to proceed with its development is motivated by its considerable environmental and economic benefits. The project will contribute to the aforementioned frameworks, Western Cape Green Economy Strategy and Just Energy Transition and this transition is important to the country and to the future growth and sustainability as an organisation.

The establishment of the Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth. The nearest rural community is approximately 7.5 km from the proposed wind farm site. The development of the wind farm is expected to boost the local economy by creating job opportunities and supporting local businesses.

Additionally, traffic mitigation measures will be enforced to minimize disruptions for local residents and tourism activities, ensuring that the overall benefits of the wind farm outweigh the challenges.

## NOISE

A full environmental impact assessment was conducted because the project area was rated as having a potentially high sensitivity to noise. The surroundings of the project focus area are sparsely populated with a few noise-sensitive developments. Most dwellings featuring in the vicinity of the project focus area are scattered in a heterogeneous fashion, typical of a rural farming area. Croplands, animal husbandry and limited residential activities (farmers and workers with their families) are predominant in the study area.

Residential areas and potential noise-sensitive developments/receptors/communities (NSR) were identified using aerial images as well as physical site visits, with the site visits verifying a number of structures used for residential activities. The potential noise impacts are assessed on these NSR in this noise study.

These noise receptors were identified using aerial imagery as well as a physical site visit. Methodology used by the specialist aimed to measure ambient sound levels. Ambient sound levels were measured in the vicinity of the project area in a semi-continuous manner over a period of 7-nights in December 2022 and again over 4-nights during September 2023 (resulting in approximately 4,000 daytime and 2,000 night-time measurements – each with a duration of 10-minutes). The highest fast-weighted sound level measured for daytime activities was more than 75 decibels A (dBA) and the lowest level was less than 20 dBA. Measurements collected at night-time periods reported the highest fast-weighted sound level of more than 75 dBA and the lowest sound level was less than 20 dBA. Average sound levels for daytime fast-weighted sound levels are 54.9 dBA and night-time fast-weighted sound levels are 47.8 dBA.

Acceptable noise limits for daytime is 45 dBA with a maximum noise limit of 52 dBA. Night-time rating levels is reported as 35 dBA with a noise limit of 42 dBA. These limits are typical of a rural noise district.

The applicant should also develop and implement an environmental noise monitoring programme at selected NSR living within the 42 dBA noise contour.

The proposed turbine layout is considered acceptable from a noise perspective (subject total noise levels are less than 45 dBA at all NSR locations used for residential purposes). There is no restriction in the WTG that the applicant could use, though the applicant must monitor noise levels, the response of receptors to the noise levels and ensure that night-time noise levels are less than 45 dBA at all receptors (structures used for permanent residential purposes). Subject to this condition, **it is recommended that the proposed Khoe WEF (and associated infrastructure) be authorized.**

### SOCIO-ECONOMIC

The findings of the Social Impact Assessment (SIA) indicate that proposed Khoe WEF project will create several social and socio-economic benefits, including creation of employment and business opportunities during both the construction and operational phase. In addition, the WEF will generate renewable energy that will improve energy security in South Africa and contribute towards reducing the countries carbon footprint. However, the benefits associated with the WEF are not site dependent and would also be associated with an alternative site.

Based on the findings of the VIA, the Khoe WEF will have a very high negative impact on the areas sense of place. The cumulative impacts on the area's sense of place will also be very high negative. Effective mitigation is not possible. Based on this finding the visual impacts associated with the proposed Khoe WEF exceed acceptable limits and are considered as a fatal flaw from a visual perspective. The development of the Khoe WEF is therefore not supported by the VIA. The findings of the SIA support the findings of the VIA. Given the areas visual sensitivity and number of established nature reserves and associated eco-tourism facilities, the Khoe WEF is located in an area that is not regarded as suitable for the establishment of a large-scale wind energy facility.

Based on the findings of the SIA the development of the proposed Khoe WEF is not supported. The suitability of establishing large WEFs, including the proposed Khoe WEF, in the area to the south of the N1 is questioned. The development of renewable energy facilities in the area to the south of the N1 represents a spillover from the Komsberg REDZ located to the north of the N1. From a long-term planning perspective this not ideal, specifically given the environmental and scenic qualities of the area. In this regard the Western Cape Provincial Spatial Development Framework highlights the importance to the Province's landscape and scenic assets and threat posed by large scale infrastructural developments such as wind farms. The Langeberg Spatial Development Framework also identifies the R318 as scenic route highlights the importance of:

- Preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture.
- Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction.
- Promoting tourism to develop sensitively and contribute to the protection of the landscape and heritage landscape.

It is also important to note that the benefits associated with the WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.

### **EAP MOTIVATION**

As mentioned above, the Western Cape Provincial Development Framework Western Cape's cultural and scenic landscapes are significant assets that underpin the tourism economy, however according to the key Provincial climate change challenge, the plan is to devise and introduce effective adaptation and mitigation responses, especially for vulnerable municipalities. One of the focus areas for mitigation is renewable energy, which is directly applicable to this Project application. Support emergent Independent Power Producers (IPPs) and sustainable energy producers (wind, solar, biomass and waste conversion initiatives) in suitable rural locations.

Furthermore, with load shedding costing South Africa's economy R500 million per stage, per day and the Western Cape's economy R75 million per stage (according to BusinessTech 2021), the country's energy crisis, needs large-scale private sector participation, in partnership with government. This will be key in addressing the current shortfall in the Western Cape.

To accelerate the decarbonisation of South Africa's economy and support economic growth, government from South Africa, France, Germany, the United Kingdom and the United States, along with the European Union announced a long-term Just Energy Transition Partnership in November 2022.

The Western Cape Climate Change Response Strategy (WCCCRS) was adopted in February 2014. The strategy is an update of the 2008 Western Cape Climate Change Response Strategy and Action Plan. The key difference with the 2008 Strategy is a greater emphasis on mitigation, including strategically suitable renewable energy development. The development of the WEF will contribute to national and global efforts to significantly reduce Green House Gas (GHG) emissions and build a sustainable low carbon economy, which simultaneously addresses the need for economic growth, job creation and improving socio-economic conditions.

Given the aforementioned framework and the Western Cape Green Economy Strategy, the establishment of this Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth.

The developer has taken into account the visual impact findings and has revised the layout multiple times to minimize visual impacts. However, the specific turbines (of the 29 turbines, 24 are located on mountain, hill or ridge) are located in high sensitivity areas are positioned there to take advantage of the optimal wind potential. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition, bearing in mind that this transition is important to the country and to the future growth of the renewables sector.

### **TRAFFIC AND TRANSPORTATION**

The extent of the study area covers key routes and intersections within a 10 km radius near the development on which the expected traffic generated by the development may have a significant impact. Thus, the following intersections were included in the study area:

- Intersection 1: N1 (Beaufort west - Worcester) and R318 (Montagu);

- Intersection 2: R318 and Road DR01442;
- Intersection 3: R318 and Road OP05749;
- Intersection 4: R318 and OP5748 (Road to Middleberg);
- Intersection 5: R318 and DR01428 (Road to Nougaspoort); and
- Intersection 6: R318 and OP05962 (Road to Keerom O/G Pad).

The volume of traffic on the Main Road R318 is relatively low compared to traffic volumes along the N1 National Road. Similarly, all other roads (Road DR01442, Road OP05749 and Road OP05748) carry significantly very low levels of traffic volumes compared to both Main Road R318 and the N1 National Road.

Trips generated during the construction phase will primarily comprise of transporting equipment, turbine components, personnel, construction, and other facility materials comprising of normal, heavy, and abnormal load vehicles. It is expected that the construction phase will have the highest traffic impact of all the phases.

Another contributor to trips generated to the site will be daily commuters/workers expected during construction. It has been assumed that a total labour force of approximately 200 -250 workers will be required during construction. Most of the labour force is expected to be sourced from towns in close proximities such as De Doorns, Worcester, Touws River with the remainder coming from other areas such as Montagu.

The operational phase is expected to have comparatively minimal traffic impact as the only transport required will be associated with monitoring, operation, and maintenance.

For the decommissioning phase, about 200 people will be needed with similar transport as the construction phase. All parts will be either reused or recycled and would most likely make their way back to the applicable Port. The decommissioning phase is expected to generate the second highest traffic impact after construction as a result of the need to remove the infrastructure and rehabilitate the site.

The base year and forecast year road capacity has indicated that the proposed development will have little to no significant impact on the existing road network capacity and intersection operational performance.

Given the findings of the TIA, it is recommended that the proposed development be considered favourably from a traffic engineering point of view as the intended construction will have no significant negative impact on the surrounding road network. **The project can be considered for environmental authorisation.**

## WAKE EFFECT ANALYSIS

A wake effect impact analysis was not needed for the project as there are currently no surrounding operational nor proposed wind farms within 30 km radius.



## SPECIALIST IMPACT SUMMARY TABLE

### CONSTRUCTION PHASE IMPACTS

Construction Phase	Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude	
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Loss of critical corridors & habitat connectivity	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of habitat/vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Potential spread of alien vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of riparian and or wetland habitat	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Changes to the hydrological regime and	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
increase potential for erosion	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Changes to surface water quality characteristics	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Terrestrial Biodiversity								
Potential vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Potential chemical contamination	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate
Reduced connectivity and restricted movement of fauna	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Potential altered flow regime	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Potential disturbance and/or displacement	Without Mitigation	Regional	Medium Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
Potential mortality of faunal and flora species	Without Mitigation	Local	Long Term	Irreversible	Negative	High	Highly Probable	Very High
	With Mitigation	Site	Medium Term	Recoverable	Negative	Low	Probable	Moderate
<b>Flora</b>								
Vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Chemical Contamination	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate
Altered regime flow	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	High
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Moderate

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Mortality of Flora	Without Mitigation	Local	Long term	Irreversible	Negative	High	Highly probable	Very High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
<b>Faunal</b>								
Direct habitat loss	Without Mitigation	Site	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Indirect habitat loss	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Displacement or disturbance	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Moderate
Direct Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	High
Indirect Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	High

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	High
<b>Avifauna</b>								
Displacement of priority species	Without Mitigation	Short term	Short term	Irreversible	Negative	Moderate	Highly likely	Medium- high
	With Mitigation	Short term	Short term	Reversible	Negative	Moderate	Probable	Medium
<b>Bats</b>								
Clearing and excavation of natural habitat	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Definite	Moderate
	With Mitigation	Local	Short term	Recoverable	Negative	Low	Probable	Low
Creating attractive bat habitat within the development terrain	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short term	Reversible	Negative	Low	Low Probability	Very Low
Construction noise	Without Mitigation	Local	Short term	Reversible	Negative	Moderate	Definite	Low
	With Mitigation	Site	Short term	Reversible	Negative	Low	Definite	Very Low
<b>Archaeology, Paleontology and Heritage</b>								
	Without Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Low

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Disturbance or destruction of fossil material	With Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Very Low
Disturbance or destruction of archaeological sites and/or materials	Without Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Low
	With Mitigation	Local	Permanent	Irreversible	Negative	Low	Low Probability	Very Low
Disruption of the cultural landscape due to the presence of construction equipment and activity	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Local	Long term	Recoverable	Negative	Moderate	Definite	Moderate
<b>Visual/Landscape</b>								
Visual impact of construction activities on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF	Without Mitigation	Very Short distance	Short term	Reversible	Negative	Very High	Definite	Very high
	With Mitigation	Very Short distance	Short term	Reversible	Negative	High	Highly Probable	High
Visual impact of construction activities on	Without Mitigation	Very Short distance	Short term	Reversible	Negative	Moderate	Highly Probable	Very high

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
observers travelling along roads within 5 km of the proposed WEF	With Mitigation	Very Short distance	Short term	Reversible	Negative	Moderate	Probable	High
<b>Noise</b>								
Construction of Access Roads	Without Mitigation	Local	Temporary	High	Negative	Medium	Likely	High to Very High
	With Mitigation	Local	Temporary	High	Negative	Low	Possible	High to Very High
Traffic Noises	Without Mitigation	Local	Short term	High	Negative	Medium	Likely	High to Very High
	With Mitigation	Local	Short term	High	Negative	Low	Possible	High to Very High
Daytime construction WTG	Without Mitigation	Local	Short term	High	Negative	Low	Possible	Low
	With Mitigation	Local	Short term	High	Negative	Low	Possible	Low
Night-time construction WTG	Without Mitigation	Regional	Short Term	High	Negative	Medium	Possible	High to Very High
	With Mitigation	Regional	Short Term	High	Negative	Low	Possible	High
<b>Socio-economic</b>								
Creation of employment and	Without Mitigation	Local - Regional	Short Term	n/a	Positive	Moderate	Probable	Moderate

Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
business opportunities	With Mitigation	Local - Regional	Short Term	n/a	Positive	Moderate	Highly Probable	Moderate
Impacts on family structures and social networks: Presence of construction workers	Without Mitigation	Local	Short Term	Irreversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	Irreversible	Negative	Low	Probable	Low
Influx of job seekers	Without Mitigation	Local	Short Term	Irreversible	Negative	Low	Probable	Low
	With Mitigation	Local	Short Term	Irreversible	Negative	Low	Probable	Low
Risk to safety, livestock, and damage to farm infrastructure	Without Mitigation	Local	Short Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	Reversible	Negative	Low	Probable	Low
Potential noise, dust and safety impacts	Without Mitigation	Local	Short Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	n/a	Negative	Low	Probable	Low



Construction Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Loss of farmland	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short term	Reversible	Negative	Low	Highly Probable	Low
Increased risk of grass fires	Without Mitigation	Local	Short Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short Term	n/a	Negative	Low	Probable	Low
<b>Traffic and Transportation</b>								
Increased peak hour Traffic	Without Mitigation	Regional	Short Term	Recoverable	Negative	Low	Probable	Low
	With Mitigation	Local	Short Term	Reversible	Negative	Low	Probable	Very Low
Increase in abnormal traffic volumes	Without Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	High
	With Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	Moderate
Deterioration of surrounding road network	Without Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low

### OPERATIONAL PHASE IMPACTS

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Potential spread of Alien vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
<b>Terrestrial Biodiversity</b>								
Potential habitat fragmentation impacts	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Potential encroachment of alien invasive species resulting in loss of flora	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low Probability	Moderate
Potential light, noise and visual impacts	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Potential fire	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Potential faunal mortality and loss of SCC	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Reversible	Negative	Low	Low probability	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Soil erosion	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
<b>Flora</b>								
Encroachment of alien invasive species	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
Unwanted Fires	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	High Probability	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Mortality of Flora	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	High Probability	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
Soil erosion	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	High Probability	High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Low probability	Moderate
<b>Faunal</b>								
Direct habitat loss	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Recoverable	Negative	Low	Low Probability	High
Indirect habitat loss	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Disturbance/ displacement	With Mitigation	Local	Long term	Recoverable	Negative	Low	Low Probability	High
	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Reversible	Negative	Low	Low Probability	High
Direct Mortality	Without Mitigation	Local	Long term	Reversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Local	Long term	Reversible	Negative	Low	Low Probability	High
Indirect Mortality	Without Mitigation	Site	Long term	Irreversible	Negative	Moderate	Highly Probable	High
	With Mitigation	Site	Long term	Recoverable	Negative	Low	Probable	Low
<b>Avifauna</b>								
Bird collision, habitat alteration and displacement	Without Mitigation	Small	Long term	Reversible	Negative	Moderate High	Probable	Highly
	With Mitigation	Small	Long term	Reversible	Negative	Moderate	Probable	Moderate
<b>Bats</b>								
Direct collision or barotrauma	Without Mitigation	Regional	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Regional	Long term	Recoverable	Negative	High	Definite	Moderate
Fatality of migrating bats	Without Mitigation	National	Long term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	National	Long term	Recoverable	Negative	Low	Low Probability	Low

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Loss of bats of conservation value	Without Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Regional	Long term	Reversible	Negative	Low	Low Probability	Low
Fatality curiosity	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Long term	Reversible	Negative	Low	Probable	Low
Smaller genetic pool	Without Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Probable	Low
Loss of foraging space	Without Mitigation	Regional	Long term	Recoverable	Negative	High	Definite	High
	With Mitigation	Regional	Long term	Reversible	Negative	Moderate	Definite	Moderate
<b>Visual</b>								
Visual impact on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF	Without Mitigation	Very Short distance	Short term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
Visual impact on observers	Without Mitigation	Very Short distance	Long term	Reversible	Negative	High	Definite	Very High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
travelling along the roads within 5 km to the proposed WEF	With Mitigation	Very Short distance	Long term	Reversible	Negative	High	Definite	Very High
Visual impact on visitors to formally protected areas within 5-10 km to the proposed WEF	Without Mitigation	Very Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
Visual impact on residents of homesteads and visitors to tourist accommodation within 5-10 km to the proposed WEF.	Without Mitigation	Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Short distance	Long term	Reversible	Negative	Very High	Definite	Very High
Visual impact on observers travelling along roads within 5-10 km to the proposed WEF.	Without Mitigation	Short distance	Long term	Reversible	Negative	High	Definite	High
	With Mitigation	Short distance	Long term	Reversible	Negative	High	Definite	High
Visual impact on residents	Without Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Highly Probable	Moderate

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
of homesteads and visitors to tourist accommodation within 10-20 km to the proposed WEF	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Highly Probable	Moderate
Visual impact on observers travelling along roads within 10-20 km to the proposed WEF	Without Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
Visual impact on visitors to formally protected areas and private nature reserves within 10-20 km to the proposed WEF	Without Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
Visual impact of shadow flicker on sensitive visual receptors in close proximity to	Without Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Medium distance	Long term	Reversible	Negative	Moderate	Probable	Moderate

Operation Phase	Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude	
the proposed WEF								
Visual impact of lighting at night on residents and visitors to homesteads and tourist accommodation within 10 km from the proposed WEF	Without Mitigation	Short to medium distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	High	Highly probable	High
Visual impact of lighting at night on observers travelling along roads within 10 km from the proposed WEF	Without Mitigation	Short to medium distance	Long term	Reversible	Negative	High	Definite	Very High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Highly Probable	High
Visual impact of the ancillary infrastructure on observers in close proximity to the structures	Without Mitigation	Very Short distance	Long term	Reversible	Negative	High	Highly Probable	High
	With Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Probable	Moderate
Visual impact of the	Without Mitigation	Very Short distance	Long term	Reversible	Negative	High	Definite	High



Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
ancillary infrastructure on observers in close proximity to the structures travelling along the R318.	With Mitigation	Very Short distance	Long term	Reversible	Negative	Moderate	Highly Probable	Moderate
The potential impact on the sense of place of the region	Without Mitigation	Long distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Long distance	Long term	Reversible	Negative	Very High	Highly Probable	Very High
<b>Noise</b>								
Daytime operation of WTG	Without Mitigation	Local	Long Term	High	Negative	Low	Possible	Low
	With Mitigation	Local	Long Term	High	Negative	Low	Possible	Low
Night-time operation of WTG	Without Mitigation	Regional	Long Term	High	Negative	Moderate	Likely	Moderate
	With Mitigation	Regional	Long Term	High	Negative	Low	Possible	Low
<b>Socio-economic</b>								
Improve energy security and support renewable sector	Without Mitigation	Local, Regional and National	Long term	Reversible	Positive	High	Highly Probable	High
	With Mitigation	Local, Regional and National	Long term	n/a	Positive	High	Definite	High



Operation Phase	Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude	
Creation of employment and business opportunities	Without Mitigation	Local and Regional	Long term	n/a	Positive	Low	Highly Probable	Moderate
	With Mitigation	Local and Regional	Long term	n/a	Positive	Moderate	Highly Probable	Low
Generate income for affected landowners	Without Mitigation	Local	Long term	Reversible	Positive	Low	Highly Probable	Low
	With Mitigation	Local	Long term	Reversible	Positive	High	Definite	Moderate
Benefits associated with the socio-economic development contributions	Without Mitigation	Local and regional	Long term	Reversible	Positive	Moderate	Probable	Low
	With Mitigation	Local and regional	Long term	Reversible	Positive	High	Definite	Moderate
Visual impact and impact on sense of place	Without Mitigation	Long distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Long distance	Long term	Reversible	Negative	Very High	Definite	Very High
Potential visual impact based on comments from local landowners	Without Mitigation	Local	Long term	Reversible	Negative	High	Highly probable	High
	With Mitigation	Local	Long term	Reversible	Negative	High	Highly probable	High

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Potential impact on value of visually affected properties	Without Mitigation	Local	Long Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Long Term	Reversible	Negative	Low	Probable	Low
Potential impact of the WEF on tourism operations that are visually impacted	Without Mitigation	Local	Long Term	Reversible	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Long Term	Reversible	Negative	Low	Probable	Moderate
Potential impact of the WEF on local tourism in the area	Without Mitigation	Local	Long Term	Reversible	Negative	Low	Improbable	Moderate
	With Mitigation	Local	Long Term	Reversible	Negative	Low	Improbable	Moderate
<b>Archaeology, Paleontology and Heritage</b>								
Disruption of the cultural landscape due to the presence of construction equipment and activity	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Local	Long term	Recoverable	Negative	Moderate	Definite	Moderate
<b>Traffic and Transportation</b>								
Increase in general peak hour traffic volumes	Without Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Very Low
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Very Low

Operation Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Increase in abnormal traffic volumes	Without Mitigation	Regional	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Regional	Immediate	Recoverable	Negative	Low	Low Probability	Moderate
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Low Probability	Low
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Improbable	Very Low
Deterioration of surrounding road network	Without Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low

### DECOMMISSIONING PHASE IMPACTS

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Loss of critical corridors & habitat connectivity	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of habitat/vegetation	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Loss of riparian and or wetland habitat	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Changes to the hydrological regime and increase potential for erosion	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Changes to surface water quality characteristics	Without Mitigation	Local	Long term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
<b>Terrestrial Biodiversity</b>								
Potential vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Reduced connectivity and restricted movement of fauna	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
Potential disturbance and/or displacement	Without Mitigation	Regional	Medium term	Recoverable	Negative	Moderate	Highly probable	High
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
Potential mortality of	Without Mitigation	Local	Long term	Irreversible	Negative	High	Highly probable	Very High

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
faunal and flora species	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
<b>Flora</b>								
Mortality of Flora species	Without Mitigation	Local	Long term	Irreversible	Negative	High	Highly probable	Very High
	With Mitigation	Site	Medium term	Recoverable	Negative	Low	Probable	Moderate
Vegetation clearing	Without Mitigation	Local	Medium Term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Probable	Low
<b>Faunal</b>								
Direct habitat loss	Without Mitigation	Site	Medium term	Recoverable	Negative	Moderate	Highly probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Indirect habitat loss	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly probable	Moderate
Displacement or disturbance	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Direct Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low

Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Indirect Mortality	Without Mitigation	Site	Short term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Site	Short term	Recoverable	Negative	Low	Low Probability	Low
Impacts of all phases of the proposed development on ecological processes of the area	Without Mitigation	Local	Long term	Recoverable	Negative	Moderate	Highly Probable	Moderate
	With Mitigation	Local	Medium term	Recoverable	Positive	Moderate	Highly Probable	Moderate
<b>Bats</b>								
Decommissioning activities	Without Mitigation	Local	Short term	Recoverable	Negative	Moderate	Definite	Moderate
	With Mitigation	Local	Short term	Reversible	Negative	Low	Definite	Low
<b>Socio-economic</b>								
Retrenchment including loss of jobs, and source of income	Without Mitigation	Local	Short term	n/a	Negative	Moderate	Probable	Moderate
	With Mitigation	Local	Short term	n/a	Negative	Low	Probable	Low
<b>Traffic and Transportation</b>								
Increase in general peak hour traffic volumes	Without Mitigation	Regional	Short Term	Recoverable	Negative	Low	Probable	Low
	With Mitigation	Local	Short Term	Reversible	Negative	Low	Probable	Very Low
Increase in abnormal traffic volumes	Without Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	High
	With Mitigation	National	Short Term	Recoverable	Negative	Moderate	Probable	Moderate



Decommission Phase		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
Deterioration of surrounding road network	Without Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Reversible	Negative	Low	Low Probability	Low
<b>Archaeology, Paleontology and Heritage</b>								
Disruption of the cultural landscape due to the presence of construction equipment and activity	Without Mitigation	Local	Long term	Irreversible	Negative	High	Definite	High
	With Mitigation	Local	Long term	Recoverable	Negative	Moderate	Definite	Moderate

**CUMULATIVE PHASE IMPACTS**

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
<b>Freshwater &amp; Wetlands (Aquatics)</b>								
Cumulative impact assessment for aquatic biodiversity	Without Mitigation	Local	Long Term	Irreversible	Negative	Moderate	Probable	Medium
	With Mitigation	Site	Short Term	Recoverable	Negative	Low	Low Probability	Low
<b>Terrestrial Biodiversity</b>								
Potential changes in	Without Mitigation	Regional	Long Term	Recoverable	Negative	Moderate	Highly Probable	High





Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
broad-scale ecological processes brought on by vegetation clearing	With Mitigation	Regional	Long term	Recoverable	Negative	Low	Low Probability	Moderate
<b>Flora</b>								
Cumulative impacts on changes to broad scale ecological processes	Without Mitigation	Regional	Long Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Regional	Long term	Recoverable	Negative	Low	Low Probability	Moderate
<b>Faunal</b>								
Impacts of landcover and land-use to the long-term persistence and viability of animal SCCs in the area	Without Mitigation	Regional	Long term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Regional	Long term	Recoverable	Positive	Moderate	Probable	High
<b>Avifauna</b>								
Cumulative impacts on birds during construction and operation	Without Mitigation	Small	Short term	High	Negative	Moderate	Highly Likely	High
	With Mitigation	Regional	Short term	Low	Negative	Moderate - high	Probable	Moderate - high
<b>Bats</b>								
Activities associated	Without Mitigation	Local	Medium term	Recoverable	Negative	Moderate	Definite	Moderate

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
with construction of solar farms within 30 km combined with the wind farm	With Mitigation	Local	Short term	Recoverable	Negative	Low	Probable	Low
<b>Visual</b>								
The potential cumulative visual impact of wind farms on the visual quality of the landscape	Without Mitigation	Medium distance	Long term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Medium distance	Long term	Reversible	Negative	Very High	Definite	Very High
<b>Noise</b>								
Numerous WTG operating simultaneously from various WEFs in area	Without Mitigation	Regional	Long Term	High	Negative	Low	Possible	Low
	With Mitigation	Regional	Long Term	High	Negative	Low	Possible	Low
<b>Visual/Landscape</b>								
The potential cumulative visual impact of wind farms on the visual quality of the landscape.	Without Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
<b>Socio-economic</b>								

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
The potential cumulative visual impact of wind farms on the visual quality of the landscape	Without Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
	With Mitigation	Medium distance	Long-term	Reversible	Negative	Very High	Definite	Very High
The potential cumulative impact on local services	Without Mitigation	Local	Long-term	Reversible	Negative	Low	Probable	Low
	With Mitigation	Local and regional	Long-term	Reversible	Negative	Moderate	Probable	Low
The potential cumulative impact on local economy	Without Mitigation	Local	Long-term	Reversible	Positive	Moderate	Highly Probable	Low
	With Mitigation	Local and regional	Long-term	Reversible	Positive	Moderate	Highly Probable	High
<b>Traffic and Transportation</b>								
Increased traffic on the route and access points to site	Without Mitigation	Regional	Short Term	Recoverable	Negative	Moderate	Probable	Probable
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Probable
Increase in abnormal traffic volumes	Without Mitigation	Regional	Short Term	Recoverable	Negative	Moderate	Highly Probable	High
	With Mitigation	Regional	Short Term	Recoverable	Negative	Moderate	Probable	Probable
Impact of dust along gravel site access roads	Without Mitigation	Site	Immediate	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Site	Immediate	Recoverable	Negative	Low	Low Probability	Low

Cumulative		Extent	Duration	Reversibility	Status	Significance	Probability	Magnitude
Deterioration of surrounding road network	Without Mitigation	Regional	Short Term	Recoverable	Negative	Low	Probable	Moderate
	With Mitigation	Local	Short Term	Recoverable	Negative	Low	Probable	Low

## DFFE: INFORMATION REQUIREMENTS FOR WIND ENERGY FACILITIES

The DFFE's requirements for information for all applications for WEFs are included in this section of the report. Where this information is not provided in the tables below, the location of where it can be found in the report is indicated.

**TABLE 0.1 DETAILS OF THE AFFECTED FARM PROPERTIES AND SG 21 CODES**

Farm Name	Portion No.	Farm No.	SG 21 Codes
Farm Eendragt	1 (RE)	38	C0500000000000380001
Farm Eendragt	2	38	C0500000000000380002
Farm Eendragt	11	38	C0500000000000380011
Farm Plaas 193	0	193	C0500000000001930000
Farm Eendragt	RE	37	C0500000000000370000

**TABLE 0.2 GENERAL SITE INFORMATION**

Component	Description/Dimensions
Copies of deeds of all affected farm portions	Submitted with the Application Form to the DFFE.
Location of the site	Approximately 20 km northwest of De Doorns within the Langeberg Local Municipality and the Cape Winelands District Municipality.
Facility Area	Approximately 85 hectares. This is the permanent development footprint
Photos of areas that give a visual perspective of all parts of the site	Refer to the Visual Impact Assessment Report (Volume II).
Photographs from sensitive visual receptors (tourism routes, tourism facilities, etc.)	Refer to the Visual Impact Assessment Report (Volume II).

**TABLE 0.3 WEF TECHNICAL DETAILS**

WEF Technical Components	Description/Dimensions - Khoe
Maximum Generation Capacity	up to 232 MW
Turbine Capacity	Up to 8 MW
Type of technology	Onshore Wind
Number of Turbines	Up to 29
WTG Hub Height from ground level	up to 150 m

WEF Components	Technical Details	Description/Dimensions - Khoe
Blade Length		up to 100 m
Rotor Diameter		up to 200 m
Structure height (Tip Height)		up to 250 m
Structure orientation		Wind regiment dependent
<b>Area occupied by both permanent and construction laydown areas</b>		<ul style="list-style-type: none"> <li>Concrete turbine foundations - approximately up to 1,000 m<sup>2</sup> per turbine</li> <li>Each turbine will have a hardstand area of approximately up to 7,500 m<sup>2</sup> per turbine</li> <li>Temporary laydown areas (with a combined footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area; and</li> <li>A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha)</li> </ul>
Operations and maintenance buildings (O&M building) with parking area		up to 1 ha
Site Access		Via the R318
Area occupied by inverter transformer stations/substations		up to 2.5 ha
Capacity of on-site substation		132/33 kV
Battery Energy Storage System footprint		up to 5 ha
BESS type		Lithium-ion technology
Width of internal roads		Access roads to the site and between project components with a width of approximately 4.5 m and a servitude of 13.5 m.
Proximity to grid connection		This has not been determined at this stage of the Project.
Internal Cabling		Cabling between the turbines, to be laid underground where practical.
Height of fencing		Up to 3 m
Water supply, volumes required		±26,500 m <sup>3</sup> for the construction, commissioning and test phase (±26 months), the majority being consumed during year-one of the construction. ±90 m <sup>3</sup> /annum for the life-of-WEF (20-25 years)

TABLE 0.4 SITE MAP AND GIS INFORMATION

Site Maps and GIS Information	Report Reference
All maps/information layers are provided in ESRI Shapefile format.	
All affected farm portions must be indicated.	Figure 2

Site Maps and GIS Information	Report Reference
The exact site of the application must be indicated (the areas that will be occupied by the application).	Figure 1
A <i>status quo</i> map/layer must be provided that includes the following: Current use of land on the site including:	
Buildings and other structures	Figure 4
Agricultural fields	Figure 4
Grazing areas	Figure 4
Natural vegetation areas (natural veld not cultivated for the preceding 10 years) with an indication of the vegetation quality as well as fine scale mapping in respect of Critical Biodiversity Areas and Ecological Support Areas	Figure 5
Critically endangered and endangered vegetation areas that occur on the site	Figure 5
Bare areas which may be susceptible to soil erosion	Figure 5
Cultural historical sites and elements	Section 6.5 and 6.6
Rivers, streams and water courses	Figure 5
Fountains, boreholes, dams (in-stream as well as off-stream) and reservoirs	Figure 5
High potential agricultural areas as defined by the Department of Agriculture, Forestry and Fisheries	Figure 4
Buffer zones (also where it is dictated by elements outside the site): 500 m from any irrigated agricultural land 1 km from residential areas	Section 6
Indicate isolated residential, tourism facilities on or within 1 km of the site	Section 6.7
A map/layer that indicate locations of birds and bats including roosting and foraging areas	Figure 6.1 - 6.3
A site development proposal map(s)/layer(s) that indicate: <ul style="list-style-type: none"> <li>• Turbine positions</li> <li>• Foundation footprint</li> <li>• Permanent laydown area footprint</li> <li>• Construction period laydown footprint</li> <li>• Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible).</li> </ul>	Figure 3

Site Maps and GIS Information	Report Reference
River, stream and water crossing of roads and cables indicating the type of bridging structures that will be used.	Figure 3
Substation(s) and/or transformer(s) sites including their entire footprint.	Figure 2
Cable routes and trench dimensions (where they are not along internal roads) Connection routes to the distribution/transmission network (the connection must form part of the EIA even if the construction and maintenance thereof will be done by another entity such as ESKOM).	Grid connection will form part of a separate application process
Cut and fill areas at turbine sites along roads and at substation/transformer sites indicating the expected volume of each cut and fill	This will be provided in the final design approval of the development layout.
Borrow pits	No borrow pits on site. Licensed borrow pits will be used to source material.
Spoil heaps (temporary for topsoil and subsoil and permanently for excess material) Buildings including accommodation	Temporary and permanent spoil heaps will be kept within demarcated construction areas, and monitored by the ECO during the construction phase.

TABLE 0.5 DEVELOPMENT AREA GEOGRAPHIC COORDINATES – KHOE WEF

WEF Boundary		
Reference point 1	33° 36' 19.66" S	19° 49' 22.29" E
Reference point 2	33° 34' 35.92" S	19° 51' 23.21" E
Reference point 3	33° 34' 30.62" S	19° 52' 10.48" E
Reference point 4	33° 33' 41.69" S	19° 53' 22.80" E
Reference point 5	33° 34' 45.71" S	19° 53' 40.74" E
Reference point 6	33° 35' 18.16" S	19° 55' 42.16" E
Reference point 7	33° 36' 42.15" S	19° 55' 54.43" E
Reference point 8	33° 37' 25.48" S	19° 50' 45.01" E
Reference point 9	33° 37' 21.30" S	19° 54' 6.55" E
Reference point 10	33° 37' 25.83" S	19° 53' 52.34" E
Reference point 11	33° 37' 1.84" S	19° 52' 1.55" E



<b>WEF Boundary</b>		
Reference point 12	33° 37' 12.56" S	19° 51' 57.36" E
Reference point 13	33° 36' 56.04" S	19° 51' 20.80" E
Reference point 14	33° 37' 30.03" S	19° 54' 26.22" E
<b>Preferred Laydown Area</b>		
Northwest Corner	33° 35' 21.49" S	19° 52' 2.50" E
Northeast Corner	33° 35' 8.47" S	19° 52' 12.71" E
Southeast Corner	33° 35' 13.074" S	19° 52' 20.12" E
Southwest Corner	33° 35' 24.60" S	19° 52' 6.51" E
<b>Preferred BESS</b>		
Northwest Corner	33° 35' 24.60" S	19° 52' 6.51" E
Northeast Corner	33° 35' 18.62" S	19° 52' 11.20" E
Southeast Corner	33° 35' 23.37" S	19° 52' 17.35" E
Southwest Corner	33° 35' 29.97" S	19° 52' 12.88" E
<b>Preferred Substation</b>		
Northwest Corner	33° 35' 15.34" S	19° 52' 17.09" E
Northeast Corner	33° 35' 17.97" S	19° 52' 21.14" E
Southeast Corner	33° 35' 23.39" S	19° 52' 17.36" E
Southwest Corner	33° 35' 20.31" S	19° 52' 13.38" E
<b>Preferred OMM</b>		
Northwest Corner	33° 35' 16.00" S	19° 52' 18.16" E
Northeast Corner	33° 35' 13.07" S	19° 52' 20.12" E
Southeast Corner	33° 35' 14.88" S	19° 52' 23.19" E
Southwest Corner	33° 35' 17.95" S	19° 52' 21.16" E
<b>Alternative Laydown Area</b>		

<b>WEF Boundary</b>		
Northwest corner	33° 35' 53.10" S	19° 53' 14.57" E
Northeast Corner	33° 35' 57.81" S	19° 53' 31.83" E
Southeast corner	33° 36' 2.70" S	19° 53' 31.59" E
Southwest Corner	33° 36' 1.92" S	19° 53' 14.82" E
<b>Alternative OMM</b>		
Northwest Corner	33° 35' 49.61" S	19° 53' 14.65" E
Northeast Corner	33° 35' 49.66" S	19° 53' 18.31" E
Southeast Corner	33° 35' 53.17" S	19° 53' 18.16" E
Southwest Corner	33° 35' 53.10" S	19° 53' 14.57" E
<b>Alternative BESS</b>		
Northwest Corner	33° 35' 49.73" S	19° 53' 24.76" E
Northeast Corner	33° 35' 49.89" S	19° 53' 32.15" E
Southeast Corner	33° 35' 57.81" S	19° 53' 31.83" E
Southwest Corner	33° 35' 57.49" S	19° 53' 24.65" E
<b>Alternative Substation</b>		
Northwest Corner	33° 35' 49.66" S	19° 53' 18.31" E
Northeast Corner	33° 35' 49.73" S	19° 53' 24.76" E
Southeast Corner	33° 35' 54.80" S	19° 53' 24.69" E
Southwest Corner	33° 35' 53.17" S	19° 53' 18.16" E

## 1. INTRODUCTION

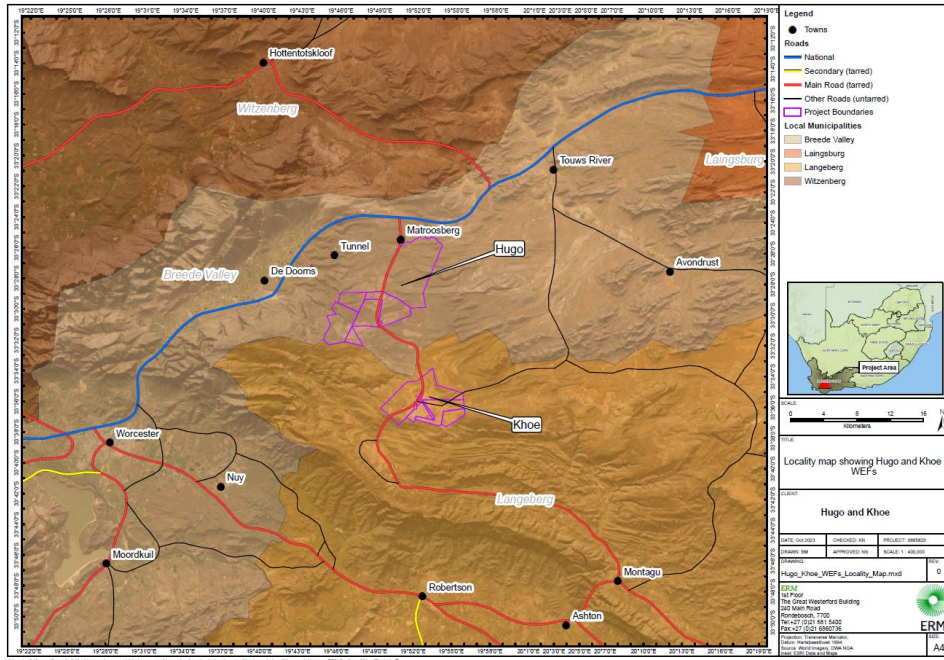
### 1.1 PROJECT OVERVIEW

FE Hugo and Khoe (Pty) Ltd is applying for an Environmental Authorisation to construct and operate the Khoe Wind Energy Facility (WEF) with a capacity of up to 232 MW. Additional ancillary infrastructure to the WEF would include underground and above-ground cabling between project components, onsite substation/s, Battery Energy Storage Systems (BESS), foundations to support turbine towers, internal/ access roads linking the wind turbines and other infrastructure on the site, and permanent workshop area and office for control, maintenance and storage. As far as possible, existing roads will be utilised and upgraded (where needed). The proposed development is located near the De Doorns town in the Western Cape Province. Hereafter, the proposed Khoe WEF as well as its associate infrastructure will be referred to as the "proposed development".

The proposed development is located approximately 20 km southeast of the De Doorns town within the Langeberg Local Municipality and the Cape Winelands District Municipality of the Western Cape Province (see Figure 1-1) FE Hugo and Khoe also proposed to develop and operate the Hugo WEF, which is situated approximately 13 km north of the Khoe WEF. The Hugo WEF forms part of a separate application process. However, it will run parallel to the Khoe WEF application process. As such, this report is strictly pertaining to the development and operation of the proposed Khoe WEF.

As per the requirements of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicant appointed Environmental Resources Management Southern Africa (Pty) Ltd. (ERM) as the independent Environmental assessment Practitioner (EAP) to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for Environmental Authorisation.

FIGURE 1-1 HUGO AND KHOE WIND ENERGY FACILITY LOCALITY MAP



## 1.2 PURPOSE OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT

The National Environment Management Act, 1998 (Act No 107 of 1998) (NEMA) promotes the use of scoping and EIA to ensure the integrated environmental management of activities.

Section 24(1) of NEMA states:

"In order to give effect to the general objectives of integrated environmental management laid down in this Chapter, the potential impact on the environment of listed activities must be considered, investigated, assessed and reported to the competent authority charged by this Act with granting the relevant environmental authorisation."

EIA is ultimately a decision-making process with the specific aim of selecting an option that will provide the most benefit and cause the least impact. The EIA process should identify activities which may have a detrimental effect on the environment, and which would therefore require EA prior to commencement.

### 1.3 DFFE COMMENTS ON THE FINAL SCOPING REPORT

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p><b>1. Application form</b></p>	
	<p>Ensure the details of the EAP are updated to reflect the latest information and changes to the person responsible for this proposed project.</p>	<p>Application updated accordingly – updated EAP and project details</p>
<p><b>Date: 20/05/2024</b></p> <p><b>Letter received via Email</b></p> <p><b>Department of Environmental Affairs and Planning (Mr Sabelo Malaza, Mr Wayne Hector)</b></p>	<p><b>2. Listed Activities</b></p>	
	<p>a) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. The physical footprint of the infrastructure in square metres must be provided in support of the applicability of this listed activity/ies.</p>	<p>All the activities that have been applied for are specific and relevant to the development activity as described in the project description. The relevant activities are included in Table 3.1 of the Draft EIA Report.</p>
	<p>b) Ensure to include thresholds for each activity applied for in the application form. The physical footprint of the infrastructure in square metres/hectares/cubic metres is not mentioned in the application form. As such, you are requested to provide the physical footprint of the infrastructure to motivate the applicability of this listed activity/ies.</p>	<p>These have been included in the application form. Please refer to table 3.1 of the Draft EIA for applicability of listing notices.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	c) Only applicable listed activities must be applied for, and the project description must be specific on what is being proposed in the final EIAR.	Acknowledged by the EAP – applicable listed activities have been applied for.
	d) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports. Provide this information as well as the coordinates of the proposed development in a separate appendix.	Table 0.1 in the Draft EIA Report provides the correct SG codes, farm names and numbers. These have been included as appendix 9 in the application form.
	e) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a> .	The listed activities in the scoping report corresponds with the Draft EIA Report
	f) The listed activities represented in the EIAR and the application form must be the same and correct.	The listed activities in Table 3.1 of the Draft EIA Report correspond with the listed activities in the application form.
	g) Landowner consent has not been provided in Appendix 3 submitted with the application form or the draft SR. Ensure that landowner consent is provided with the next document submission.	Landowner consent forms have been included in the updated application form.
	<b>3. Alternatives</b>	
	a) The EAP is required to provide a <b>clear assessment</b> for each identified/ or assessed alternative and further provide clear motivation and reasons as to why the preferred alternative proves to be the preferred compared to other Alternatives. This relates to the location alternative, site layout	An assessment for each identified alternative location, layout alternative and technology alternative has been included. A clear motivation and reason for the selection of the preferred

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	alternatives/design, technology alternative, and Battery Energy Storage Systems alternatives.	alternative have been included in this draft EIA report.
	b) The EIAR must provide the five corner coordinates points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided. Coordinates must be in the format as prescribed by the NEMA EIA Regulations, 2014, as amended. A separate appendix, as indicated above, must be provided for co-ordinates.	Coordinates for the have been included in table 0.5 in the Draft EIA.
	<b>4. Layout &amp; Sensitivity Maps</b>	
	<p>a) All available biodiversity information must be used in the finalisation of the final layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:</p> <ul style="list-style-type: none"> <li>i. Ensure that the titles of the maps are consistent. The preferred layout must be presented in the final layout map.</li> <li>ii. The final envisioned area for the wind facility, i.e. location of wind turbines (including turbine numbers) and all associated infrastructure including BESS and all associated infrastructure should be mapped at an appropriate scale.</li> <li>iii. All supporting onsite infrastructure such as concrete turbine foundations and turbines hard stands, on-site IPP substation, temporary and permanent laydown areas, overhead or underground cabling between the turbines, temporary staff accommodation areas, BESS area, access roads and internal gravel roads, fencing and lighting, telecommunication infrastructure area, stormwater channels, water pipelines, offices and operational control</li> </ul>	<ul style="list-style-type: none"> <li>i. Refer to Volume I for figures</li> <li>ii. Refer to Volume I – Figure 3</li> <li>iii. This will be produced prior to construction</li> <li>iv. Refer to Volume I – Figure 3</li> <li>v. Refer to Volume I – Figure 3</li> <li>vi. Refer to Volume I - Figures</li> <li>vii. Refer to Volume I – Figure 3</li> <li>viii. Refer to Volume I – Figure 3</li> <li>ix. Refer to Volume I – Figure 5 and 6.1 to 6.3</li> </ul>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>centre, operation and maintenance area / warehouse / workshop, ablution facility areas, and etc.</p> <ul style="list-style-type: none"> <li>iv. All necessary details regarding all locations and sizes of the substations and internal power lines.</li> <li>v. All necessary details regarding related to the proposed wind facility.</li> <li>vi. Turbines must be clearly numbered.</li> <li>vii. All existing infrastructure on the site, especially internal road infrastructure.</li> <li>viii. The maps should be provided in high resolution and be clear and legible. Ensure to use a definitive icon or colour which contrasts against the background information and colours of the maps provided</li> <li>ix. Please provide an environmental sensitivity map, if possible, which indicates the following:                             <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;</li> <li>• Sensitivity Buffer areas; and All “no-go” areas.</li> </ul> </li> </ul>	
	<p>b) It must be emphasised that the final EIAR must include a final layout map which adheres to specialist recommendations as well as the identified no-go areas and buffer zones. All turbines must be numbered on all submitted maps. Please include a separate appendix which contains all relevant mapping information.</p>	<p>Figure 6.1 -6.3 of the Draft EIA Report report includes a map combining the layout map superimposed (overlain) on the environmental sensitivity map.</p>
	<p>c) The above site-specific map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>	<p>Refer to Figure 7.1 and 7.2 in Volume I - Figures</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	d) Google maps will not be accepted for decision-making purposes. Ensure that distinct colours are Used on the maps to differentiate features, especially on the sensitivity map.	Google maps have been avoided in the EIA.
	e) Include a description of the process to determine the finalised layout i.e. specialist considerations, site sensitivities etc.	An evolution report has been included as appendix C.
	f) A cumulative map which shows the proposed wind farms linked to this application (i.e. Khoe WEF Application currently in process). The map should highlight the grid connections used and show if the WEFs will share any infrastructure.	Cumulative map has been included in Volume I - Figures
	g) 'Section 11.9.2 Visual Sensitivities' of the Final Scoping report highlights numerous visual sensitivities and their recommended buffers. The turbines occurring within these buffers must be either microsited as far as possible or motivated for. Include turbine numbers when providing these motivations to ensure ease of map reference.	The layout has been revised twice during the EIA phase to account for visual sensitive areas. However, according to the VIA turbines are still located in high sensitive areas. A motivation for the turbines still located in these high sensitive areas have been provided by the EAP in the EIA Report.
	<b>5. Public Participation Process</b>	
	a) Please ensure that all issues raised, and comments received from registered I&APs and organs of state which have jurisdiction are submitted to the Department with the EIAR. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning, the Department of Agriculture, Forestry and Fisheries (DAFF), the provincial Department of Agriculture, the South African Civil Aviation Authority (SACAA), the Department of Transport, the Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African	These have been included in Volume III – Comments and Response Report

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>National Roads Agency Limited (SANRAL), the South African Heritage Resources Agency (SAHRA), EWT, BirdLife SA, CapeNature, the Department of Mineral Resources, the Department of Rural Development and Land Reform, the Square Kilometre Array (SKA) and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation (BCAdmin@dffe.gov.za, for the attention of Mr Seoka Lekota) and Department of Forestry, Fisheries and the Environment: Protected Areas Management Effectiveness.</p>	
	<p>b) Please ensure that all issues raised and comments received during the circulation of the final SR from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the EIAR. Proof of correspondence with the various stakeholders must be included in the EIAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</p>	<p>Final scoping has been circulated however no comments were received during this period.</p>
	<p>c) The Public Participation Process must be conducted in terms Regulation 39, 40, 41, 42, 43 &amp; 44 of the NEMA EIA Regulations 2014, as amended.</p>	<p>This process has been conducted accordingly.</p>
	<p>d) A comments and response trail report (C&amp;R) must be submitted with the draft EIAR. The C&amp;R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully and in chronological order. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p>	<p>C&amp;R report has been included as Volume III</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	e) Please include the date of publishing and the names of the newspapers used in the EIAR.	Details of newspaper advertisements have been included in Section 9 of the Draft EIA Report
	6. Specialist Assessments	
	<ul style="list-style-type: none"> <li>a. The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</li> <li>A detailed description of the study’s methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.</li> <li>Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.</li> <li>Please note that the Department considers a ‘no-go’ area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the ‘no-go’ areas.</li> <li>Should the specialist definition of ‘no-go’ area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the ‘no-go’ area’s buffer if applicable.</li> <li>All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.</li> <li>Should a specialist recommend specific mitigation measures, these must be clearly indicated.</li> <li>Regarding cumulative impacts: Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</li> </ul>	<p>Please refer to Sections 10 – 12 and Volume II – Specialist studies.</p> <p>The EAP acknowledges that the departments definition of a ‘no-go’ area is for any infrastructure, including the associated infrastructure such as access roads. The proposed development, including the associated infrastructure is not proposed within no-go areas.</p> <p>The avifauna and bat specialist has identified areas of no-go for turbines. These areas are clearly defined and marked in the maps.</p> <p>All specialist studies are final and provide detailed / practical mitigation measures. Further studies are only provided for post construction of the proposed development.</p> <p>Specific mitigation measures as recommended by specialists are clearly indicated the EIAR and EMPr.</p> <p>No contradicting recommendations were provided by specialists. Specialists’ recommendations have been considered and included Section 13 of the EIAR to be included in EA and / or in the EMPr for implementation.</p> <p>An assessment of cumulative impacts, including significance ratings, has been included in Section 4.3.3 and Section 11 of the Draft EIA Report. The actual development footprint of the nearby</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<ul style="list-style-type: none"> <li>• A detailed process flow to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>• Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.</li> <li>• The significance rating must also inform the need and desirability of the proposed development.</li> <li>• A cumulative impact environmental statement on whether the proposed development must proceed.</li> <li>• Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</li> </ul>	<p>Renewable Energy developments could not be easily quantified or accessed spatially. For example, the National Renewable Energy EIA Application Database contains the land parcels, and not the footprint. Nonetheless, it is believed that the assessment of cumulative impacts has been adequately captured in this Draft EIA Report.</p> <p>Detailed process flow and proof of the assessments have been included in the individual independent specialist reports.</p> <p>The need and desirability of the proposed project takes into account the cumulative impacts of surrounding developments of the area.</p> <p>A statement of the cumulative impacts of the proposed development has been included in the report.</p> <p>No contradicting recommendations were provided by specialists. Specialists’ recommendations have been considered and included Section 13 of the EIAR to be included in EA and / or in the EMPr for implementation.</p>
	<p>b) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p>	<p>All specialist studies includes detailed description of their methodology, as well as the locations and descriptions of turbines, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p>
	<p>c) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p>	<p>Please refer to Section 2.5 in draft EIA report</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>No contradicting recommendations, apart from visual specialist. The locations of turbines within high sensitive areas are currently the best for wind resource potential and the removal of these will entirely jeopardize the project.</p>
	<p>e) It is further brought to your attention that Procedures 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, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.</p>	<p>The EAP is aware of the requirements of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998. Specialist assessments have been conducted in accordance with Government Notice No. 320 of 20 March 2020.</p>
	<p>f) Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.</p>	<p>Please refer to Section 4, table 4-1 of the Draft EIA Report</p>
	<p>g) The screening tool output:</p> <ul style="list-style-type: none"> <li>• The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</li> <li>• Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.</li> </ul>	<p>Please refer to Section 4, table 4-1 of the Draft EIA Report.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<ul style="list-style-type: none"> <li>It is the responsibility of the EAP to confirm the list of specialist assessments provided by the screening tool and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached. If the findings of the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.</li> </ul>	
	<p>h) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>	<p>Please refer to response above.</p>
	<p>i) If no wake effect assessment is to be included, please include a motivation thereof.</p>	<p>No wake effect assessment required, as there are currently no neighbouring wind farms within the project area (35 km).</p>
	<p>j) It is highly emphasised that specialist assessments are done in the correct season to ensure a comprehensive understanding of the environment.</p>	<p>Please refer to Volume II – Specialist Reports</p>
	<p>k) It is noted in the Comments and Responses report, Page xxix, that no offset is planned for the development. However, 'a research and stewardship programme to protect the riverine rabbit following the offset guidelines needs to be developed.' Further information must be provided once the specialist assessments provide deeper understanding into their distribution in the area.</p>	<p>Wording has been amended to align with terminology defined in the national offset guidelines. The restoration of modified habitat was the original intention, i.e, as part of the mitigation hierarchy. This would result in a low negative or positive residual impact and therefore no offsets as contemplated by the guidelines are considered applicable.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>I) A biodiversity offset investigation must be employed if the proposed development has RESIDUAL MEDIUM to HIGH impact i.e., after the mitigation hierarchy has been exhausted. Please consult the National Offset Guideline. The offset plan must include stakeholder engagement, definitive goals, timeframes, budget responsibilities and management requirements. It must also include a monitoring and reporting plan to assess the effectiveness of the offset. Any offset considerations must include</p> <p>Should an offset plan need to be compiled, note that a final offset plan must be submitted with the final EIAR.</p>	<p>The residual impact would not be medium or high after the mitigation hierarchy has been exhausted- it will be low or positive following rehabilitation</p>
	<p><b>7. Cumulative Assessment</b></p>	
	<p>Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> <li>i) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</li> <li>ii) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>iii) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>iv) A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>An assessment of cumulative impacts, including significance ratings, has been included in Section 4.3.3 and Section 11 of the Draft EIA Report. The actual development footprint of the nearby Renewable Energy developments could not be easily quantified or assessed spatially. For example, the National Renewable Energy EIA Application Database contains the land parcels, and not the footprint. Nonetheless, it is believed that the assessment of cumulative impacts has been adequately captured in this Draft EIA Report.</p> <p>Detailed process flow and proof of the assessments have been included in the individual independent specialist reports.</p> <p>The need and desirability of the proposed project takes into account the cumulative impacts of surrounding developments of the area.</p>

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
		A statement of the cumulative impacts of the proposed development has been included in the report.
	<b>8. Environmental Management Programme</b>	
	<p>a) A final construction and operational phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAR.</p> <p>i. It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, must be signed and submitted with the final report over and above the EMPr for the facility.</p> <p>ii. Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the NEMA EIA Regulations, 2014, as amended.</p>	<p>a) A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures has been drafted and will be submitted with the EIAR.</p> <p>The generic EMPr for the development of a substation has been appended to the EMPr submitted with the Draft EIA Report.</p>
	<p>b) The EMPr must consider the following, and where possible, include:</p> <ul style="list-style-type: none"> <li>• An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.</li> <li>• A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a</li> </ul>	<p>The content of the EMPr produced for the proposed development is in compliance in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended, and includes, where relevant the plans and measures recommended by the Department.</p>



Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</p> <ul style="list-style-type: none"> <li>• An avifauna monitoring and management plan to be implemented during the construction and operation of the facility. This plan must be drafted by a suitably qualified avifauna specialist.</li> <li>• A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must 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.</li> <li>• An open space management plan to be implemented during the construction and operation of the facility.</li> <li>• A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time -up areas so as not to disturb existing retail and commercial operations.</li> <li>• A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment.</li> <li>• A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.</li> <li>• A fire management plan to be implemented during the construction and operation of the facility.</li> <li>• An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion</li> </ul>	

Date of comment, format of comment, name of organisation / I&AP	Comment	Response from EAP / Applicant / Specialist
	<p>mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.</p> <ul style="list-style-type: none"> <li>• An effective monitoring system to detect any leakage or spillage of all 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.</li> <li>• Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</li> </ul>	
	<p>The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.</p>	<p>Contradicting recommendations were provided by specialists. Specialists' recommendations have been considered and included Section 13 of the Draft EIA Report to be included in EA and / or in the EMPr for implementation.</p>

## 2. TERMS OF REFERENCE

The primary objective of the S&EIA process is to present sufficient information to the competent authority (CA) and interested and affected parties (I&APs) on predicted potential impacts and associated mitigation measures required to avoid or mitigate potential negative impacts, as well as to improve or maximise the potential benefits of the development.

In terms of legal requirements, the NEMA EIA Regulations 2014, as amended, regulate and prescribe the content of the EIA Report and specify the type of supporting information that must accompany the submission of the report to the authorities. Table 2-1 shows how and where the legal requirements are addressed in this EIA Report. Section 9 of this EIA Report provides a summary of the Public Participation Process (PPP) and Volume III of this EIA Report includes all Public Participation undertaken to date. As comments were received these have been collated and included in this EIA Report.

As per the EIA Regulations 2014, as amended, 'the objective of the environmental impact assessment process is to, through a consultative process -

*(a) determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;*

*(b) describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the development footprint on the approved site as contemplated in the accepted scoping report;*

*(c) identify the location of the development footprint within the approved site as contemplated in the accepted scoping report based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;*

*(d) determine the:*

*(i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and*

*(ii) degree to which these impacts -*

*(aa) can be reversed;*

*(bb) may cause irreplaceable loss of resources, and*

*(cc) can be avoided, managed or mitigated;*

*(e) identify the most ideal location for the activity within the development footprint of the approved site as contemplated in the accepted scoping report based on the lowest level of environmental sensitivity identified during the assessment;*

*(f) identify, assess, and rank the impacts the activity will impose on the development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity;*

*(g) identify suitable measures to avoid, manage or mitigate identified impacts; and*

*(h) identify residual risks that need to be managed and monitored.'*

The above activities were completed through consultation with:

- The lead authority involved in the decision-making for the application (in this case, the DFFE);
- I&APs, provincial and local governments, and other relevant organisations to ensure that local issues are well understood; and
- The specialist team to ensure that technical issues are identified.

The existing environment within which a proposed development is to be located was investigated, through a review of relevant background literature and ground-truthing and any required long-term on-site monitoring.

The primary objective of the EIA is to present key stakeholders with the findings of the assessments, obtain and document feedback and address all issues raised.

**TABLE 2-1 LEGISLATIVE REQUIREMENTS FOR SCOPE OF ASSESSMENT AND CONTENT OF ENVIRONMENTAL IMPACT ASSESSMENT REPORTS**

<b>Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)</b>	<b>Location in EIA</b>
3 (1) <i>An environmental impact assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include-</i>	
(a) <i>details of- the EAP who prepared the report; and the expertise of the EAP, including a curriculum vitae;</i>	Section 2 Appendix A
(b) <i>the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including- the 21-digit Surveyor General code of each cadastral land parcel; where available, the physical address and farm name; where the required information in items (i) and (ii) is not available, the co-ordinates of the boundary of the property or properties;</i>	Executive Summary
(c) <i>a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is- a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or on land where the property has not been defined, the coordinates within which the activity is to be undertaken;</i>	Figure 3
(d) <i>a description of the scope of the proposed activity, including- all listed and specified activities triggered and being applied for; and a description of the associated structures and infrastructure related to the development;</i>	Section 3
(e) <i>a description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context;</i>	Section 3 and 5
(f) <i>a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred development footprint within the approved site as contemplated in the accepted scoping report;</i>	Section 5
(g) <i>a motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report;</i>	Section 8

Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)	Location in EIA
(h) a full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including:	
details of the development footprint alternatives considered;	Section 7
details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;	Section 9 Volume III
a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;	Section 9
the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Section 6
the impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated;	Section 10 and 11
the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;	Section 4 Volume II
positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Section 10 and 11
the possible mitigation measures that could be applied and level of residual risk;	Section 10 and 11
if no alternative development footprints were investigated, the motivation for not considering such; and	Section 7
a concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scoping report;	Section 8
(i) a full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred development footprint within the approved site as contemplated in the accepted scoping report through the life of the activity, including -	
a description of all environmental issues and risks that were identified during the environmental impact assessment process; and	Section 10
an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;	Section 10
(j) an assessment of each identified potentially significant impact and risk, including- cumulative impacts; the nature, significance and consequences of the impact and risk; the extent and duration of the impact and risk; the probability of the impact and risk occurring; the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreplaceable loss of resources; and the degree to which the impact and risk can be mitigated;	Section 11

Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)	Location in EIA
(k) <i>where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report;</i>	Section 12
(l) <i>an environmental impact statement which contains- a summary of the key findings of the environmental impact assessment; a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers; and a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;</i>	Section 12 and 13 Figure 7
(m) <i>based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation;</i>	Section 12 and 13 Volume II
(n) <i>the final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment;</i>	Section 8
(o) <i>any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;</i>	Section 13
(p) <i>a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;</i>	Section 2 Volume II
(q) <i>a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;</i>	Section 13
(r) <i>where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised;</i>	The proposed activity includes operational aspects.
(s) <i>an undertaking under oath or affirmation by the EAP in relation to- the correctness of the information provided in the reports; the inclusion of comments and inputs from stakeholders and I&amp;APs; the inclusion of inputs and recommendations from the specialist reports where relevant; and any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties; and</i>	Appendix A
(t) <i>where applicable, details of any financial provision for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts;</i>	n/a
(u) <i>An indication of any deviation from the approved scoping report, including the plan of study, including- any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and a motivation for the deviation;</i>	n/a Specialist following the same methodology and protocols in the EIA phase. There are no deviations from the approved Plan of Study

Appendix 3 Requirements NEMA, 1998 (Act No. 107 of 1998)		Location in EIA
(v)	any specific information that may be required by the competent authority; and	Section 13
(w)	any other matters required in terms of section 24(4)(a) and (b) of the Act.	n/a
3 (2)	Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to an environmental impact assessment report the requirements as indicated in such notice will apply.	Volume II

## 2.1 STRUCTURE OF THE EIA REPORT

The EIA report is set out in three volumes:

- Volume I: EIA Report;
- Volume II: Specialist Reports; and
- Volume III: Public Participation Report (including Comments and Responses table).

## 2.2 DEVIATIONS FROM PLAN OF STUDY

There are no deviations from the approved PSEIA.

## 2.3 THE APPLICANT

The Project Applicant appointed ERM, with the lead EAP being Stephanie Gopaul to co-ordinate and manage the S&EIA application process. The appointed specialist team was based on the results of the DFFE Screening Tool Report generated.

TABLE 2-2 DETAILS OF THE APPLICANT

Name of the Applicant	FE Hugo & Khoe (Pty) Ltd		
Name of contact person for applicant (if other)	Mr Thomas Condesse		
Company Registration Number	K2022778660		
BBBEE status	n/a		
Physical address	15 Bridgeway Road, Bridgeways Precinct, Century City, Cape Town		
Postal address	15 Bridgeway Road, Bridgeways Precinct, Century City, Cape Town		
Postal code	7441	Cell:	+33 6 22 66 59 32
Telephone	-	Fax:	-
E-mail	Thomas.Condesse@energyteam.co.za/Deon.lottering@energyteam.co.za		

## 2.4 DETAILS OF THE EAP

The co-ordination and management of this environmental application process is being conducted by Environmental Resources Management Southern Africa (Pty) Ltd ('ERM) with the lead EAP

being Stephanie Gopaul (Table 2-3) Refer to Appendix A for the EAP's Declaration of Interest and Curriculum Vitae.

**TABLE 2-3 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER**

<b>Company of EAP</b>	<b>Environmental Resource Management Southern Africa (Pty) Ltd.</b>
EAP name and surname	Stephanie Gopaul
EAP Qualifications and Professional affiliations	Masters in Environmental Management, University of the Free State, South Africa, 2012 BSc. Environmental and Engineering Geology, University of KwaZulu Natal, South Africa, 2005
Physical address	Regus, Floor -3, 18 The Boulevard, Westway Office Park, Westville, Durban
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E-mail	stephanie.gopaul@erm.com / hugokhoe@erm.com

#### 2.4.1 THE S&EIA PROJECT TEAM

**TABLE 2-4 S&EIA PROJECT TEAM**

<b>Discipline</b>	<b>Specialist</b>	<b>Specialist Organisation</b>
EAP	Khosi Ngema	ERM (Pty) Ltd
Soil and Agricultural Potential	Johann Lanz	Independent Consultant
Avifauna	Dr Rob Simmons	Birds and Bats Unlimited
Bats	Stephanie C Dippenaar	EkoVler
Visual / Landscape	Lourens du Plessis	LOGIS
Heritage and Palaeontology	John Gribble	TerraMare Archaeology
Noise	Mornè De Jager	Enviro Acoustic Research
Socio-Economic	Tony Barbour	Independent Consultant
Traffic and Transportation	Victor de Abreu and Reabetswe Mokomele	SMEC
Terrestrial Biodiversity (Fauna and Flora)	Owen Davies	ERM
Freshwater and Wetlands (Aquatics)	Brian Colloty	EnviroSci



## 2.5 ASSUMPTIONS AND LIMITATIONS

### 2.5.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

There were no specific assumptions, uncertainties or gaps in knowledge or data that affected the findings of the study.

### 2.5.2 FRESHWATER AND WETLANDS

Obtaining comprehensive understanding of the dynamics of both the flora and fauna of communities within study sites, as well as the status of endemic, rare or threatened species in any study area, assessments should consider investigations at different time scales (across seasons/years) and through replication. Due to time constraints these long-term studies are not feasible and are thus mostly based on instantaneous sampling. This limitation is common to many impact assessment type studies, but the findings are deemed adequate for the purposes of decision-making, unless otherwise stated.

Due to the scope of the work for the assessment of the proposed development, a long-term investigation of the proposed site was not possible and not perceived as part of the Terms of Reference (ToR). A concerted effort was made to sample and assess as much of the potential site, as well as make use of any supporting literature, species distribution data and aerial photography.

Information presented by the specialist, which have been included in this EIA, only has reference to the study area as indicated on the accompanying maps and cannot be applied to any other area without detailed investigation.

### 2.5.3 TERRESTRIAL BIODIVERSITY

- The contents of this report relate to the proposed Khoe WEF and associated infrastructure.
- SCC are classified as Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT), Data Deficient (DD) and Rare.
- The identity of several plant SCC are withheld from this and subsequent reports due to the sensitivity of these species to illegal harvesting. These species are known by numerical identifiers (Sensitive Species 142, 207, 508, 521, 654, 1004) assigned by the SANBI. The identity of these species has been made available to the Specialist for consideration during the compilation of reports relevant to the study area.
- Previous studies used to compile online species distribution datasets used to supplement the species list for the proposed Khoe WEF and associated infrastructure PAOI are extremely limited and cannot be seen as fully representative of the diversity of plant species potentially on site.

### 2.5.4 FAUNAL

Inventory surveys of animal species occurring across a site are difficult to achieve within the time-frames associated with an EIA. To compile a comprehensive site-specific list would require extensive sampling. For assessment purposes, it is considered more important to identify species and processes of conservation value that may be impacted upon. Therefore, this assessment attempts to identify threatened and other significant species, important habitats, and ecological processes. Camera trap survey design was focused to meet the study objectives, and full species inventories were not the primary objective of this study, but rather

the confirmation of presence. A study<sup>4</sup> on the camera trapping of mammals in open scrubland suggested that reliable estimates of species richness can be achieved when cameras are spaced 1 x 1 km apart and left in the targeted area until a survey effort of 1000 days is realized. More elusive species may require between 1,600 and 3,000 camera trap days or a change in sampling intensity and number of deployment sites. The spatial and temporal deployment of the camera trap survey therefore unlikely resulted in a complete species inventory of the study area, however the 1,832 camera trap days was considered sufficient for the purposes of this study.

It is not possible to confirm the absence of a species with certainty, particularly rare or low-density species or species with short, not-fully understood activity windows (e.g. some insect species). If species were not detected, they were nonetheless assumed to be present for assessment purposes. Presence confirmation was considered more significant than absence. However, at locations where presence was confirmed, they were generally detected and recorded relatively soon after camera trap deployment and regularly thereafter throughout the deployment period. This indicates that they are relatively common within areas of suitable habitat, and it is considered unlikely that they were present at sites where they were not detected. Not all patches of suitable habitat were monitored, it is assumed that if e.g., a Riverine Rabbit (*Bunolagus monticularis*) was detected within a certain habitat type or patch, that the species is present throughout that habitat type or patch. Current distribution and habitat suitability models for Riverine Rabbit largely utilize abiotic factors and sighting records and are likely subject to refinement as research on this poorly understood species improves.

While independent image captures were determined through the exclusion of multiple images of the same individual taken during the same instance, independent captures may nevertheless represent the same individual taken at different times and therefore the number of independent captures does not indicate the population size at a location in this study.

### 2.5.5 FLORA

- The contents of this report relate to the proposed Khoe WEF and associated infrastructure.
- SCC are classified as Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT), Data Deficient (DD) and Rare.
- The identity of several plant- SCC are withheld from this- and subsequent reports due to the sensitivity of these species to illegal harvesting. These species are known by numerical identifiers (Sensitive Species 142, 207, 521, 654, 692, 871 and 1209) assigned by the SANBI. The identity of these species has been made available to the Specialist for consideration during the compilation of reports relevant to the study area.
- Previous studies used to compile online species distribution datasets used to augment the species list for the proposed Khoe WEF and associated infrastructure PAOI are extremely limited and cannot be seen as fully representative of the diversity of plant species potentially on site.
- Where online databases provided records of species that have several sub-species but provided no reference to which sub-species was recorded, it was assumed the sub-species was that with the greatest conservation importance.

<sup>4</sup> Colyn, R.B., Radloff, F.G.T. & O'Riain, M.J. Camera trapping mammals in the scrublands of the Cape Floristic Kingdom—the importance of effort, spacing and trap placement. *Biodivers. Conserv.* 27, 503–520 (2018). DOI: 10.1007/s10531-017-1448-z

### 2.5.6 AVIFAUNA

The SABAP2 national dataset is relatively sparse from this area with 47 full-protocol cards in the 29 pentads that cover the Khoe wind energy facility site and surrounds. These were only used in the modelling to give a historical perspective on overall species richness.

Any site visits to record birds, even over a 12-month period, may not provide a complete picture of all species likely to occur in an arid region. Rainfall is the chief limiting factor as it dictates if, and when, birds occur and whether they breed on site (Dean 2004, Seymour et al. 2015). While drought dominated southern Africa from 2014-2019, above average rainfall occurred and provided a boom period for avian species that may otherwise may not have occurred. Thus, the data presented represent a "worst case scenario" at a particularly species-rich moment.

The CRM analysis is a data hungry model that requires large data sets for each species to determine probabilities and give accurate risk assessments. Some species did not reach these thresholds – either because they were seldom recorded (Lanner Flacon) or because they were rarely recorded within the Blade Swept Area (Southern Black Korhaan), both Red Data species. While this means that no risk assessments can be determined, it also means that the risk for these species is likely to be very low simply because they were seldom recorded on site.

One of the most difficult variables to record is the flying height of a bird, and sources of error are expected. To minimise this, known height objects on site were used to assist with gauge height. For example, all wind energy facilities have weather masts (Met masts) varying from 80 m to 120 m to measure wind speeds. These and pylon towers (typically 38 m high for the 400kV or 765kV) transmission lines, also helps gauge the altitude at which birds are flying.

### 2.5.7 BATS

An EIA must fit into a range of legislative and commercial processes, which dictate the timeframes and budgets of the studies that inform the EIA process. A rigorous scientific study would by its nature take longer and cost more than is feasible in terms of an EIA specialist study. The legislated time period for pre-assessment bat monitoring is approximately 12-months. Ideally, data collected over three or four years would provide a more comprehensive and robust indication of bat presence and activity under a range of weather conditions. These limitations are recognised, and every step is taken to manage them to ensure a thorough study is undertaken, based on credible scientific approaches.

Although it is an internationally accepted way of presenting bat data, the use of bat monitoring detectors to measure the relative abundance of bat activity as 'low', 'medium', or 'high', has limitations. This element of subjectivity is due to the extent that the results are based on the specialist's experience in interpreting the data into a qualitative baseline assessment report. A 'cautious' approach should be considered concerning accepting bat numbers as absolute true data, and hence recent guidelines regarding bat monitoring recommend a 'standardised' approach and include statistical formulas and calculations. Examples of assumptions and limitations in monitoring methods are highlighted below.

The knowledge of certain aspects of South African bats, such as population size, spatial and temporal movement patterns (e.g. migration and flying heights), and how bats may be impacted by wind energy, is limited, as their behaviour differs when comparing with the same type of European or American bat species.

Data is extrapolated from recordings of bat calls over large areas, whereas acoustic monitoring only samples small areas of space. Furthermore, the sound recording of the bat echolocation could be influenced by the type and intensity of the call, the bat species, the detector system used, the orientation of the signal relative to the microphone, and other environmental conditions, such as weather conditions.

The accuracy of species identification is dependent on the calls used for proof of identity but can be influenced by variation in bat calls within species, and between different species, and the overlapping of species call parameters. Although species names are mentioned, true species identification can only really be conducted when handling the bat. Species are identified as those that are the most likely due to call parameters and distribution maps, but confirmation of species will only be possible during the post-construction phase if a bat carcass is collected.

Bat detectors record bat activity, but the sensors cannot distinguish between a single bat passing multiple times, which could lead to double counting or multiple bats of the same species passing the device once (Kunz et al. 2007). Therefore, if we discuss bat activity, it means that bats were active on-site. If we talk about high bat activity, one could nevertheless derive that there are many bats on the terrain. Comparative studies of bat activity from similar locations are used to verify baseline information. Due to the overlap of calls, it is not possible to provide an exact number of bats passing the recorder. Therefore, the number of bats passing is not an exact count, but as close as possible under the given circumstances, and within the limitations of the survey techniques.

Bats do not echolocate in a uniform, monotonous way. For example, when they go on a feeding frenzy, it is difficult to identify a species from the sound of a call. Sometimes a species could also echolocate at a frequency somewhat higher or lower than the normal identifiable frequency. These calls could then be nearer to the range of another species. For this study, bat calls from unidentifiable species were recorded as 'unclear'. These calls are identified as a bat, but uncertainty exists as to the species identification.

Weather stations were situated at 117 m, while the bat monitoring system with which the weather was correlated, was situated at 100 m. The ideal is that the weather monitor is at the system, but a 17 m difference should nevertheless provide a fairly accurate correlation.

It is not possible to search the entire site as well as the wider neighbouring terrain for bat roosts, as small roosts can be found in numerous rock crevices, aardvark holes, or under the bark of some trees. However, the site is walked through as thoroughly as possible, within the legislated time frames of a bat impact assessment, as discussed above, and any roosts or indication of bat presence discovered during ground-truthing are incorporated into the study.

Only a year of pre-construction bat monitoring is required by legislation in South Africa, but changing weather conditions result in sporadic changes in the bat situation with consequent higher insect activity, resulting in higher bat activity. Weather changes could therefore result in changes in bat activity and the region experienced exceptionally high rainfall during 2023. Bats might therefore be less active in the following years if rainfall is lower or within the normal range for the region.

### 2.5.8 NOISE

Ambient sound levels are cumulative effects of innumerable sounds generated at various instances both far and near. A high measurement does not equate to an area that is constantly

noisy. Low sound levels do not mean an area is always quiet. Sound levels are variable across seasons, time of day, dependent on faunal characteristics, vegetation present, and meteorological conditions. The Environmental Noise Impact Assessment (ENIA) (Volume II) provides a full list of assumptions and limitations related to the assessment of noise impacts.

### 2.5.9 SOCIO-ECONOMIC

It is assumed that the development site represents a technically suitable site for the establishment of the proposed WEF and associated infrastructure.

The strategic importance of promoting renewable and other forms of energy is supported by the national and provincial energy policies.

Legislation and policies reflect societal norms and values. The legislative and policy context therefore plays an important role in identifying and assessing the potential social impacts associated with a proposed development. In this regard, a key component of the SIA process is to assess the proposed development in terms of its fit with key planning and policy documents. As such, if the findings of the study indicate that the proposed development in its current format does not conform to the spatial principles and guidelines contained in the relevant legislation and planning documents, and there are no significant or unique opportunities created by the development, the development cannot be supported.

There are no limitations that have a material bearing on the SIA.

### 2.5.10 TRAFFIC AND TRANSPORTATION

The assessment has been prepared based on the information provided by the Client and the following assumptions, amongst others:

- It was assumed that the construction period will last approximately 2 years with a 5-day working week resulting in 480 working days over 24 months.
- Construction trips were estimated without a detailed construction schedule programme.
- For the assessment of cumulative impacts, a conservative approach was adopted by assuming that all wind energy facilities within 30 km currently approved, planned or proposed would be constructed concurrently.
- WTG components will be imported and transported with abnormal vehicles from the most feasible port of entry/harbour.
- Haulage will occur on surfaced national and provincial roads and existing site access gravel roads.
- Construction material and labour force will be sourced locally.

### 2.5.11 HERITAGE AND ARCHAEOLOGY

The TerraMare Archaeology was unable to reach all areas of the proposed WEF on account of heavy rain during the site visit. The area received 100 mm of rain in a single night (half of the average annual rainfall) which resulted in Ou Muur (Re 193) and Eendracht (Re 37) being cut off from the road and the WTGs in the eastern corner of the WEF being inaccessible. Elsewhere in the WEF area, although going was heavy, access was possible.

As indicated already, the archaeological survey was carried out at the surface only and any completely buried archaeological sites or material will have not been located or recorded.

Although we believe that most of the relevant archaeological assessments and HIAs from the area have been located and reviewed, it is acknowledged that some reports may not have been identified for review.

### 2.5.12 PALEONTOLOGY

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the quartzites, mudstones, sandstones, shales and sands are typical for the country and some might contain fossil plants, traces of bioturbation and invertebrate. The overlying soils and sands of the Quaternary period would not preserve fossils (Bamford, 2024).

### 2.5.13 VISUAL/LANDSCAPE

To prepare this report, LoGis utilised only the documents and information provided by ERM or any third parties directed to provide information and documents by ERM. LoGis has not consulted any other documents or information in relation to this report, except where otherwise indicated. The findings, recommendations and conclusions given in this report are based on the author's best scientific and professional knowledge, as well as, the available information.

This report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken. LoGis and its staff reserve the right to modify aspects of the report including the recommendations if and when new information may become available from on-going research or further work in this field, or pertaining to this investigation.

This assessment was undertaken during the planning stage of the project and is based on information available at that time. It is assumed that all information regarding the project details provided by ERM and the Applicant is correct and relevant to the proposed project. This Visual Impact Assessment and all associated mapping has been undertaken according to the worst-case scenario with the layout provided.

The findings, recommendations and conclusions given in this report are based on the author's best scientific and professional knowledge, as well as, the available information. This report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken. LOGIS reserve the right to modify aspects of the report including the recommendations if and when new information may become available from on-going research or further work in this field, or pertaining to this investigation.

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This assessment was undertaken during the planning stage of the project and is based on information available at that time.

This Visual Impact Assessment and all associated mapping has been undertaken according to the worst-case scenario.

### 3. ENVIRONMENTAL LEGAL FRAMEWORK

The proposed development requires environmental authorisation prior to being constructed and operated. This section of the report highlights the important environmental legal considerations taken while undertaking this S&EIA process.

#### 3.1 THE NATIONAL ENVIRONMENT MANAGEMENT ACT, 1998 (ACT NO 107 OF 1998)

Section 2 of the National Environment Management Act, 1998 (NEMA) as amended, lists environmental principles that are to be applied by all organs of state regarding developments that may significantly affect the environment. Included amongst the key principles is the principle that all developments must be socially, economically, and environmentally sustainable, and environmental management must place people and their needs at the forefront of its concern, to serve their physical, psychological, developmental, cultural and social interests equitably.

NEMA, as amended, also provides for the participation of potential and registered I&APs and it stipulates that decisions must take the interests, needs and values of all I&APs into account.

Chapter 5 of NEMA, as amended, outlines the general objectives and implementation of Integrated Environmental Management (IEM), the latter providing a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. Section 24 provides a framework for the granting of environmental authorisations.

To give effect to the general objectives of IEM, the potential impacts on the environment of listed activities must be considered, investigated, assessed, and reported to the competent authority. Section 24(4) outlines the minimum requirements for procedures for the investigation, assessment and communication of the potential impact of activities.

#### 3.2 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REGULATIONS, 2014 AS AMENDED

The EIA Regulations 2014 as amended by GNR 326 of 2017 provide for the control of certain Listed Activities. These activities are listed in Government Notice No. R327 (Listing Notice 1 – Basic Assessment), R325 (Listing Notice 2 – Scoping & EIA Process) and R324 (Listing Notice 3 – Basic Assessment) of 7 April 2017, and are prohibited to commence until environmental authorisation has been obtained from the competent authority, in this case, the Department of Forestry and Fisheries (DFFE).

The DFFE is the competent authority for all renewable energy proposals which will be bid into the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), as NEMA, as amended, states that:

*"24C. (2) The Minister must be identified as the competent authority in terms of subsection (1) if the activity- (a) has implications for international environmental commitments or Relations"*

It is the intention of the Project Applicant to bid on the Khoe WEF in the next bidding window of the REIPPPP with the aim of evacuating the generated power from the WEF into the National Eskom Grid.



Environmental authorisation, which may be granted subject to conditions, will only be considered upon compliance with GNR982, as amended by GNR326 of 7 April 2017.

Any Environmental Authorisation obtained from the DFFE applies only to those specific listed activities for which the application was made. To ensure that all Listed Activities that could potentially be applicable to this proposal are covered by the Environmental Authorisation, a precautionary approach is followed when identifying listed activities, that is, if an activity could potentially be part of the proposed development, it is listed.

The Listed Activities applicable to this proposed project are presented in Table 3-1 below. All potential impacts associated with these Listed Activities will be considered and adequately assessed in this authorisation process.

**TABLE 3-1 NEMA LISTED ACTIVITIES IN RELATION TO THE PROPOSED DEVELOPMENT**

Listing Notices 1, 2 and 3 07 April 2017	Listed Activity	Description of project activity that triggers listed activity
<b>Listing Notice 1 – GNR 327</b>		
Listing Notice 1 GN R 327 Activity 11(i)	<i>The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts;</i>	FE Hugo and Khoe propose to develop an on-site substation at the Khoe WEF location with a capacity of 132 kV to facilitate the connection to the national grid. The turbines will be connected to the on-site substation via cabling with a capacity of 33kv or more, the development footprint for the facility substation is located outside of an urban area.
Listing Notice 1 GN R 327 Activity 12(ii)(a)(c)	<i>The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; Where such development occurs— (a) within a watercourse; or (c) within 32 metres of a watercourse</i>	The WEF will require the establishment of infrastructure (including internal access roads) with a physical footprint exceeding 100m <sup>2</sup> within or within 32m of drainage features, ephemeral washes or streams present within the project site.
Listing Notice 1 GN R 327 Activity 14	<i>The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic meters or more but not exceeding 500 cubic meters.</i>	The development of the WEF will include the construction and operation of facilities and infrastructure for the storage and handling of dangerous goods (combustible and flammable liquids, such as oils, lubricants, solvents associated with the facility, and facility substation) where such storage will occur inside containers with a combined capacity exceeding 80 cubic meters but not exceeding 500 cubic meters. The volumes are not known at the time but will have a maximum combined capacity of 400 m <sup>3</sup> .
Listing Notice 1 GN R 327 Activity 19(i)	<i>The infilling or depositing of any material of more than 10 cubic meters into, or the dredging, excavation, removal or moving of soil, sand shells, shell grit, pebbles or rock of more than 10 cubic meters from a watercourse.</i>	Drainage features, ephemeral washes or streams are present within the project site. During the construction phase, more than 10 m <sup>3</sup> of rock will be removed from drainage features for the construction of the wind energy facility and associated infrastructure.

Listing Notices 1, 2 and 3 07 April 2017	Listed Activity	Description of project activity that triggers listed activity
Listing Notice 1 GN R 327 Activity 24(ii)	<i>The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8metres;</i>	The width of the internal access roads between the project components will be approximately 8m but may be up to 10m wide where required for the movement of the crane between turbine positions.
Listing Notice 1 GN R 327 Activity 28(ii)	<i>Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.</i>	The total area to be developed for the WEF (including the facilities substations) are greater than 1 ha and occurs outside an urban area and is currently used for agricultural purposes, mainly grazing. The WEF is located outside an urban area. The proposed development is approximately 85 ha.
Listing Notice 1 GN R 327 Activity 56(i)(ii)	<i>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre – (i) where the existing reserve is wider than 13,5 meters; or (ii) where no reserve exists, where the existing road is wider than 8 metres.</i>	Existing farm roads within the project site will be widened to up to 8 m and/or lengthened by more than 1 km to accommodate the movement of heavy vehicles and cable trenching activities.
<b>Listing Notice 2 – GNR 325</b>		
Listing Notice 2 GN R 325 Activity 1	<i>The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.</i>	The Khoe WEF is anticipated to have an electricity capacity of up to 232 MW.
Listing Notice 2 GN R 325 Activity 15	<i>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) the undertaking of a linear activity</i>	The total for the Khoe WEF is ~4,113 ha, with a development footprint of ~ 85 ha. The project is proposed on a property where the predominant land use is grazing and comprises of indigenous vegetation. It is therefore anticipated that over 20 ha of indigenous vegetation will be cleared as a result of the development.
<b>Listing Notice 3 – GNR 324</b>		
Listing Notice 3 GN R 324 Activity 4(i)(ii)(aa)	<i>The development of a road wider than 4 metres with a reserve less than 13,5 metres (i) in the Western Cape, (ii) outside urban areas (aa) within areas containing indigenous vegetation</i>	Existing roads on the affected properties will be used where feasible and practical. The width of the main access roads at the access points will be up to 8 m. The WEF will have internal access roads of up to 4.5 m wide, with a servitude of up to 13.5 m, 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 on-

Listing Notices 1, 2 and 3 07 April 2017	Listed Activity	Description of project activity that triggers listed activity
		<p>site substation hub (which includes substation infrastructure, BESS and Balance of Plant area).</p> <p>The project site is located within the Western Cape Province, outside of an urban area and on land containing indigenous vegetation.</p>
Listing Notice 3 GN R 324 Activity 18(i)(ii)(aa)	<p><i>The widening of a road by more than four (4) meters, or the lengthening of a road by more than one (1) kilometre within</i></p> <p><i>(i) the Western Cape, and in</i></p> <p><i>(ii) Areas on the watercourse side of the development setback line or within 100 metres from the edge of a watercourse where no such setback line has been determined;</i></p> <p><i>(aa) Areas containing indigenous vegetation.</i></p>	Existing farm roads within the project site will be widened to up to 10 m. The project site is located in the Western Cape, outside of an urban area, on land containing indigenous vegetation and within 100 m of the edge of a watercourse.

### 3.3 THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT NO 25 OF 1999 - NHRA)

Section 38 (1) of the National Heritage Resources Act, 1999 (NHRA) lists development activities that would require authorisation by the responsible heritage resources authority. Activities considered applicable to the proposed project include the following:

“(a) The construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;

(c) any development or other activity which will change the character of a site; and (i) exceeding 5,000 m<sup>2</sup> in extent.”

The NHRA, 1999, requires that a person intending to undertake such an activity must notify the relevant national and provincial heritage authorities at the earliest stages of initiating such a development. The relevant heritage authority would then in turn, notify the person whether a Heritage Impact Assessment Report should be submitted. According to Section 38(8) of the NHRA, 1999, a separate report would not be necessary if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act, 1989 (No. 73 of 1989) (ECA) (now replaced by NEMA, Act 107 of 1998) or any other applicable legislation. The decision-making authority must ensure that the heritage evaluation fulfils the requirements of the NHRA, 1999, and take into account any comments and recommendations made by the relevant heritage resources authority.

The Notice of Intent to Develop (NID), was submitted to Heritage Western Cape (HWC) on 24 November 2023.

In South Africa, the law is directed towards the protection of human-made heritage, although places and objects of scientific importance are covered. The NHRA, 1999, also protects intangible heritage such as traditional activities, oral histories, and places where significant

events happened. While not specifically mentioned in the NHRA, scenic routes are recognised as a category of heritage resources which requires grading as the Act protects areas of aesthetic significance.

The heritage and paleontology impact assessment reports has been submitted to HWC for comment on 21 August 2024.

### 3.4 NATIONAL DEPARTMENT OF AGRICULTURE, LAND REFORM AND RURAL DEVELOPMENT (DALRRD)

A renewable energy facility requires approval from the National Department of Agriculture, Land Reform and Rural Development (DALRRD) if the facility is on agriculturally zoned land. A No Objection Letter for the change in land use is required. This letter is one of the requirements for receiving municipal rezoning. This application requires motivation backed by good evidence that the development is acceptable in terms of its impact on the agricultural production potential of the development site. This process is separate from the S&EIA process and should not affect the EA decision.

### 3.5 SUBDIVISION OF AGRICULTURAL LAND ACT, 1970 (ACT NO. 70 OF 1970 - SALA)

In terms of the Subdivision of Agricultural Land Act, 1970, any application for change of land use must be approved by the Minister of Agriculture. This is a consent for long-term lease in terms of the SALA. If DALRRD approval for the development has already been obtained in the form of the No Objection letter, then SALA approval should not present any difficulties. Note that SALA approval is not required if the lease is over the entire farm portion. SALA approval (if required) can only be applied for once the Municipal Rezoning Certificate and Environmental Authorisation has been obtained.

### 3.6 CONSERVATION OF AGRICULTURAL RESOURCES, 1983 (ACT NO. 43 OF 1983)

The Conservation of Agricultural Resources Act (CARA), 1983 states that no degradation of natural land is permitted. The Act requires the protection of land against soil erosion and the prevention of water logging and salinization of soils by means of suitable soil conservation works to be constructed and maintained. The utilisation of marshes, water sponges and watercourses are also addressed.

Rehabilitation after disturbance to agricultural land is managed by the CARA. A consent in terms of CARA is required for the cultivation of virgin land. Cultivation is defined in CARA as "any act by means of which the topsoil is disturbed mechanically". The purpose of this consent for the cultivation of virgin land is to ensure that only land that is suitable as arable land is cultivated. Therefore, despite the above definition of cultivation, disturbance to the topsoil that results from the construction of a renewable energy facility and its associated infrastructure does not constitute cultivation as it is understood in CARA. This has been corroborated by Anneliza Collett (Acting Scientific Manager: Natural Resources Inventories and Assessments in the Directorate: Land and Soil Management of the Department of Agriculture, Land Reform and Rural Development (DALRRD)). The construction and operation of the facility will therefore not require consent from the Department of Agriculture, Land Reform and Rural Development in terms of this provision of CARA.

### 3.7 NATIONAL VELD AND FOREST FIRE ACT, 1998 (ACT NO. 101 OF 1998)

The purpose of the National Veld and Forest Fire Act, as amended by the National Fire Laws Amendment Act (Act 12 of 2001), is to prevent and combat veld, forest, and mountain fires throughout South Africa. The Act applies to the open countryside beyond the urban limit and puts in place a range of requirements. It also specifies the responsibilities of landowners. The term 'owners' includes lessees, people in control of land, the executive body of a community, the manager of State land, and the chief executive officer of any local authority. The requirements include, but are not limited to, the maintenance of firebreaks and availability of firefighting equipment to reasonably prevent the spread of fires to neighbouring properties.

### 3.8 THE ENVIRONMENT CONSERVATION ACT, 1989 (ACT NO.73 OF 1989), THE NATIONAL NOISE CONTROL REGULATIONS: GN R154 OF 1992

The Environment Conservation Act, 1989 (ECA) allows the Minister of Environmental Affairs and Tourism (now the "Minister of Forestry, Fisheries and the Environment") to make regulations regarding noise, amongst other concerns. The Minister has made noise control regulations under the ECA.

In terms of section 25 of the ECA, the national noise-control regulations (NCR) were promulgated (GN R154 in *Government Gazette* No. 13717 dated 10 January 1992). The NCRs were revised under Government Notice Number R. 55 of 14 January 1994 to make it obligatory for all authorities to apply the regulations.

Subsequently, in terms of Schedule 5 of the Constitution of South Africa of 1996 legislative responsibility for administering the NCR was devolved to provincial and local authorities.

These regulations define "**disturbing noise**" as:

*"Noise level which exceeds the zone sound level or, if no zone sound level has been designated, a noise level which exceeds the ambient sound level at the same measuring point by 7 dBA or more".*

These Regulations prohibit anyone from causing a disturbing noise. The Noise Assessment will take these Regulations into consideration when identifying and assessing the potential noise impacts associated with the proposed development.

### 3.9 NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER (2011)

Climate change is already a measurable reality and along with other developing countries, South Africa is especially vulnerable to its impacts. This White Paper presents the South African Government's vision for an effective climate change response and the long-term, just transition to a climate-resilient and lower-carbon economy and society. South Africa's response to climate change has two objectives:

- Effectively manage inevitable climate change impacts through interventions that build and sustain South Africa's social, economic and environmental resilience and emergency response capacity.
- Make a fair contribution to the global effort to stabilise greenhouse gas (GHG) concentrations in the atmosphere at a level that avoids dangerous anthropogenic

interference with the climate system within a timeframe that enables economic, social and environmental development to proceed in a sustainable manner.

### 3.10 WESTERN CAPE CLIMATE CHANGE RESPONSE STRATEGY: VISION 2050 (2022)

Globally, climate change is being recognised as an Emergency, with immediate systems change required to achieve significant emissions reductions by 2030 and maintain a habitable planet for all, whilst adjusting to the spreading impacts of climate change. The Western Cape has already started to experience the impacts of climate change and these are undermining our social and economic development gains. An accelerated response is required to address the threats and opportunities posed by climate change across the spectrum of the sectors of the region and the Western Cape Government. This Strategy guides the bold shifts required by 2030 to ensure we both meet our emissions reductions targets and create social, ecological and economic resilience in the face of climate destabilisation through the course of the next three decades up to 2050.

The Western Cape Climate Change Response Strategy: Vision 2050 (WCCCRS) describes a climate future that the Western Cape province will strive towards. It is centered on a Vision and four Guiding Objectives defining the direction of climate change response action for the region, with corresponding targets and actions.

### 3.11 NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004)

Section 34 of the Air Quality Act, 2004 (AQA) makes provision for:

- (1) The Minister to prescribe essential national noise standards –
  - a. For the control of noise, either in general or by specified machinery or activities or in specified places or areas; or
  - b. For determining –
    - i. a definition of noise; and
    - ii. the maximum levels of noise.
- (2) When controlling noise, the provincial and local spheres of government are bound by any prescribed national standards.

This section of the Act is in force, but no such standards have yet been promulgated.

An atmospheric emission license issued in terms of Section 22 may contain conditions in respect of noise. This, however, will not be relevant to this proposed development.

#### 3.11.1 NATIONAL DUST CONTROL REGULATIONS, 2013

The National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), makes provision for national dust control regulations. These regulations prescribe dust fall standards for residential and non-residential areas. These Regulations also provide for dust monitoring, control, and reporting.

The acceptable dust fall out rates are:

Restriction Area	Dust Fall (D) (mg/m <sup>2</sup> /day, 30 day average)	Permitted Frequency of exceedance
Residential	D<600	Two within a year, not sequential months
Non-Residential	600 <D< 1200	Two within a year, not sequential months

These rates are to be adhered to by the developer during the life of the project.

### 3.12 NATIONAL WATER ACT, 1998 (ACT NO. 36 OF 1998 - NWA)

The National Water Act, 1998 (NWA) provides for constitutional requirements including pollution prevention, ecological and resource conservation and sustainable utilisation. In terms of this Act, all water resources are the property of the State.

A water resource includes any watercourse, surface water, estuary or aquifer, and, where relevant, its bed and banks. A watercourse is interpreted as a river or spring; a natural channel in which water flows regularly or intermittently; a wetland lake or dam into which or from which water flows; and any collection of water that the Minister may declare to be a watercourse.

Relevant water uses for the proposed construction of the WEF which will require access roads over watercourses and drainage channels and boreholes for construction water, in terms of Section 21 of the Act include but are not limited to the following:

*Section 21 (a):* Abstraction of water from boreholes and rivers or dams;

*Section 21 (b):* Storage of water (dams or reservoirs);

*Section 21 (c):* Impeding or diverting the flow of water in a watercourse;

*Section 21 (i):* Altering the bed, banks, course or characteristics of a watercourse; and

*Section 21 (g):* Storage of domestic waste in conservancy tanks.

GN 1199 of 18 December 2009 grants general authorisation (GA) for the above water uses based on certain conditions. It also stipulates that these water uses must be registered with the responsible authority.

Pollution of river water is a contravention of the NWA. Chapter 3, Part 4 of the NWA deals with pollution prevention and in particular the situation where pollution of a water resource occurs or might occur as a result of activities on land. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent pollution of water resources.

Chapter 3, Part 5 of the NWA deals with pollution of water resources following an emergency incident, such as an accident involving the spilling of a harmful substance that finds or may find its way into a water resource. The responsibility for remedying the situation rests with the person responsible for the incident or the substance involved.

#### 3.12.1 PERMIT REQUIREMENTS

A Water Use License Application (WULA) or a General Application (GA) may be required. This will be determined by the Department of Water and Sanitation (DWS) during the WULA pre-application process.

This process will run separate to this EA application process.

### 3.13 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004 (ACT NO. 10 OF 2004 - NEMBA)

#### 3.13.1 THREATENED OR PROTECTED SPECIES LIST, 2015

Amendments to the Threatened or Protected Species (TOPS) list were published on 31 March 2015 in Government Gazette No. 38600 and Notice 256 of 2015. Certain flora and fauna that occur on the site may be threatened or protected.

#### 3.13.2 ALIEN AND INVASIVE SPECIES REGULATIONS, 2016

The Act and Regulations set out various degrees of Invasive Species (Plants, Insects, Birds, Animals, Fish and Water Plants) and requires that certain of those invasive species are documented and, in some cases, removed from properties in South Africa.

**The Regulations list 4 categories of invasive species** that must be managed, controlled, or eradicated from areas where they may cause harm to the environment, or that are prohibited to be brought into South Africa. A Terrestrial Ecology Assessment will be conducted as part of this S&EIA process to identify as well as propose ways in which to manage alien invasive species found at the proposed site area.

### 3.14 WESTERN CAPE BIODIVERSITY ACT (WCBA, ACT 6 OF 2021)

The WCBA and its implementation through regulations will enable a transformed biodiversity economy focusing on enabling access to critical resources in an equitable and sustainable manner.

The WC Biodiversity Act sets out a best practice model for the governance of public entities. This will further enable CapeNature's successes and ability to pursue the multiple objectives of protection and management of the world-renowned biodiversity and ensure that protected areas enable economic opportunities in local rural economies.

### 3.15 NATIONAL FORESTS ACT, 1998 (ACT NO. 84 OF 1998 - NFA)

This act lists protected tree species and prohibits certain activities. The prohibitions provide that *"no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister"*.

Any protected tree species recorded within the proposed site area shall be managed in accordance with the NFA as relevant.

### 3.16 ASTRONOMY GEOGRAPHIC ADVANTAGE ACT, 2007 (ACT. 21 OF 2007)

The Act provides for the preservation and protection of areas within the Republic that are uniquely suited for optical and radio astronomy. The Square Kilometre Array radio telescope is located in the declared Karoo Central Advantage Array and as such it is protected against harmful interference from wireless communication and electromagnetic emissions from electrical equipment.



According to the DFFE Screening Tool, there were no Weather Radar installations within a 60km radius.

### 3.17 NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996) (NRTA)

The technical recommendations for highways (TRH 11): "*Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads*" outline the rules and conditions which apply to the transport of abnormal loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.

Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges, and culverts.

The general conditions, limitations, and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution, and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.

The South African National Roads Authority (SANRAL) and the Provincial Department of Transport would act as a Competent/Commenting Authority as a result of the proposed road infrastructure associated with the Khoe WEF.

### 3.18 CIVIL AVIATION ACT, 2009 (ACT NO. 13 OF 2009) (CAA)

The Civil Aviation Act, 2009 (Act No. 13 of 2009) (CAA), governs civil aviation in the Republic. The Act provides for the establishment of a stand-alone authority mandated with the controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. This mandate is fulfilled by the South African Civil Aviation Authority (SACAA), an agency of the Department of Transport (DoT).

The SACAA achieves the objectives of the Act by complying with the Standard and Recommended Practices (SARPs) of the International Civil Aviation Organisation (ICAO), while considering the local context when issuing the South African Civil Aviation Regulations (SA CARs). All proposed developments or activities in South Africa that potentially could affect civil aviation must be assessed by SACAA in terms of the CARs and the South African Civil Aviation Technical Standards (SA CATs), in order to ensure civil aviation safety.

The SACAA and Air Traffic Navigation Services (ATNS) has been included as a stakeholder and will continue to be provided with an opportunity to comment on the application during the public participation process.

### 3.19 PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2002) (PAIA)

The PAIA gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights; and to provide for matters connected therewith.

The PAIA has and will be adhered to during all stakeholder engagement activities undertaken as part of this S&EIA process.

### 3.20 NATIONAL ENVIRONMENTAL MANAGEMENT ACT: NATIONAL APPEALS REGULATIONS, 2014

The purpose of these regulations is to regulate the procedure contemplated in section 43(4) of the National environmental management act relating to the submission, processing and consideration of a decision on an appeal. This Act is used to help guide and understand the appeal process and the procedures may follow.

#### 3.21 ADDITIONAL RELEVANT LEGISLATION

The applicant must also comply with the provisions of other relevant national legislation. Additional relevant legislation that has informed the scope and content of this S&EIA Report includes the following:

- Constitution of the Republic of South Africa, 1996 (Act No. 108, 1996);
- Aviation Act, 1962 (Act No. 74, 1962);
- National Environmental Management: Waste Act, 2008 (Act No. 59, 2008);
- National Environmental Management: Protected Areas Act, 2003 (Act No. 57, 2003);
- National Roads Act, 1998 (Act No. 7, 1998)
- Occupational Health and Safety Act, 1993 (Act No. 85 of 1993);
- National Veld and Forest Fire Bill of 10 July 1998;
- Fertiliser, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947);
- Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002); and
- Independent Communications Authority of South Africa Act, 2000 (Act No. 13 of 2000; as amended); and
- Screening Report referred to in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended.

#### 3.22 CONVENTIONS AND TREATIES

##### 3.22.1 THE PARIS AGREEMENT (2016)

South Africa is one of 195 countries that are signatory to The Paris Agreement. The Paris Agreement is a legally binding instrument within the United Nations Framework Convention on Climate Change (UNFCCC) that provides guidance for action on climate change, focusing on sustainable development and poverty eradication. It sets the goal of preventing increase in global average temperature to below 2 degrees Celsius and pursuing efforts to limit global temperature increase to 1.5 degrees Celsius. Previous Minister of the DFFE, Ms Edna Molewa, signed the Paris Agreement on Climate Change on behalf of South Africa on 22 April 2016.<sup>5</sup>

The proposed WEF fits the emission reduction targets of the Paris Agreement and its aim of sustainable development.

<sup>5</sup>[https://www.environment.gov.za/mediarelease/southafrica\\_ratifies\\_parisagreement](https://www.environment.gov.za/mediarelease/southafrica_ratifies_parisagreement) (accessed on 24 January 2019).

### 3.23 THE CONVENTION ON BIOLOGICAL DIVERSITY (CBD) (1993)

This is a multilateral treaty for the international conservation of biodiversity, the sustainable use of its components and fair and equitable sharing of benefits arising from natural resources. Signatories have the sovereign right to exploit their own resources pursuant to their own environmental policies, and the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction. South Africa became a signatory to the CBD in 1993, which was ratified in 1995.

The convention prescribes that signatories identify components of biological diversity important for conservation and monitor these components in light of any activities that have been identified which are likely to have adverse impacts on biodiversity. The CBD is based on the precautionary principle which states that where there is a threat of significant reduction or loss of biological diversity, lack of full scientific certainty should not be used as a reason for postponing measures to avoid or minimise such a threat and that in the absence of scientific consensus the burden of proof that the action or policy is not harmful falls on those proposing or taking the action.

#### 3.23.1 THE RAMSAR CONVENTION (1971)

The Convention on Wetlands, called the Ramsar Convention, as it was adopted in the Iranian city of Ramsar in 1971 and came into force in 1975, is an intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. Under the three pillars of the convention the Contracting Parties commit to work towards the wise use of all their wetlands through national plans, policies and legislation, management actions and public education; designate suitable wetlands for their list of Wetlands of International Importance (the "Ramsar List") and ensure their effective management; and Cooperate internationally on transboundary wetlands, shared wetland systems, shared species, and development projects that may affect wetlands.

#### 3.23.2 THE CONVENTION ON THE CONSERVATION OF MIGRATORY SPECIES OF WILD ANIMALS (CMS OR BONN CONVENTION) (1983)

An intergovernmental treaty, concluded under the sponsorship of the United Nations Environment Programme, concerned with the conservation of wildlife and habitats on a global scale. The fundamental principles listed in Article II of this treaty state that signatories acknowledge the importance of migratory species being conserved and agree to take action to this end *"whenever possible and appropriate", "paying special attention to migratory species the conservation status of which is unfavourable and taking individually or in cooperation appropriate and necessary steps to conserve such species and their habitat"*.

#### 3.23.3 THE AGREEMENT ON THE CONSERVATION OF AFRICAN-EURASIAN MIGRATORY WATERBIRDS (AEWA) (1999)

An intergovernmental treaty developed under the framework of the Convention on Migratory Species (CMS), concerned with the coordinated conservation and management of migratory waterbirds throughout their entire migratory range. Signatories of the Agreement have expressed their commitment to work towards the conservation and sustainable management of migratory waterbirds, paying special attention to endangered species as well as to those with an unfavourable conservation status. The assessment of the ecology and identification of sites and

habitats for migratory waterbirds is required to coordinate efforts that ensure that networks of suitable habitats are maintained and investigate problems likely posed by human activities.

### 3.24 POLICIES AND GUIDELINES

#### 3.24.1 ENVIRONMENTAL IMPACT ASSESSMENT GUIDELINES

Relevant guidelines and policies as applicable to the management of the S&EIA process and to this application have also been taken into account, as indicated below:

- IEM Guideline Series (Series 3): Stakeholder engagement (2002);
- IEM Guideline Series (Series 4): Specialist studies (2002);
- IEM Guideline Series (Series 5): Impact Significance (2002);
- IEM Guideline Series (Guideline 5): Companion to the EIA Regulations 2010 (October 2012);
- IEM Guideline Series (Series 7): Cumulative Effects Assessment (2002);
- IEM Guideline Series (Guideline 7): Public Participation in the EIA process (October 2012);
- IEM Guideline Series (Series 7): Alternatives in the EIA process (2002);
- IEM Guideline Series (Guideline 9): Draft guideline on need and desirability in terms of the EIA Regulations 2010 (October 2012);
- DEA (2017) Guideline on Need and Desirability, Department of Environmental Affairs (DEA) Pretoria, South Africa (2017);
- IEM Guideline Series (Series 12): Environmental Management Plans (EMP) (2002); and
- IEM Guideline Series (Series 15): Environmental impact reporting (2002).

#### 3.24.2 THE EQUATOR PRINCIPLES (EPS) III, 2013

The principles applicable to the project are likely to include:

- Principle 2: Environmental and Social Assessment;
- Principle 3: Applicable Environmental and Social Standards;
- Principle 4: Environmental and Social Management System and Equator Principles Action Plan;
- Principle 5: Stakeholder Engagement;
- Principle 6: Grievance Mechanism;
- Principle 7: Independent Review;
- Principle 8: Covenants;
- Principle 9: Independent Monitoring and Reporting; and
- Principle 10: Reporting and Transparency.

These principles, among various requirements, include a requirement for an assessment process and an Environmental and Social Management Plan (ESMP) to be prepared by the client to address issues raised in the assessment process and incorporate actions required to comply with the applicable standards, and the appointment of an independent environmental expert to verify monitoring information.

### 3.24.3 SOUTH AFRICAN WIND ENERGY FACILITY GUIDELINES

The following guidelines are relevant to the proposed WEF and the potential impacts they may have on bats/avifauna and habitat that support bats/avifauna:

- South African Best Practice Guidelines for Pre-Construction Monitoring of Bats at Wind Energy Facilities. 5th Edition. 2020;
- South African Best Practice Guidelines for Operational Monitoring of Bats at Wind Energy Facilities. 5th Edition. 2020;
- South African Bat Fatality Threshold Guidelines. Edition 2. 2018;
- The Species Environmental Assessment Guideline (SANBI, 2020);
- Best-Practice Guidelines for assessing and monitoring the impact of wind-energy facilities on birds in southern Africa. Third Edition, 2015;
- Best Practice Guidelines for Verreaux's Eagle and Wind Energy (BirdLife South Africa, 2017), and the more recent draft update of these: Verreaux's Eagles and Wind Farms (BirdLife South Africa, 2021);
- The Southern African Bird Atlas Project 2 data, available at the pentad level (<http://sabap2.adu.org.za/v1/index.php>) (accessed at [www.mybirdpatch.adu.org.za](http://www.mybirdpatch.adu.org.za));
- IUCN 2021. The IUCN List of Threatened Species. 2021 - 3. <http://www.iucnredlist.org/>;
- Wind Energy Impacts on Birds in South Africa: A Preliminary review of the results of operational monitoring at the first wind farms of the Renewable Energy Independent Power Producer Procurement Programme in South Africa. BLSA. Occasional Report Series: 2;
- On a collision course: the large diversity of birds killed by wind farms in South Africa (Perold et al. 2020);
- Birds & Renewable Energy. Update for 2019. BirdLife South Africa. Birds and Renewable Energy Forum, 10 October 2019; and
- Avian Wind Farm Sensitivity Map. Birdlife South Africa. <http://www.birdlife.org.za/conservation/birds-and-wind-energy/windmap>.

### 3.24.4 INTERNATIONAL FINANCE CORPORATION (IFC) PERFORMANCE STANDARDS

The IFC's Performance Standards on Social and Environmental Sustainability (Referred to as Performance Standards hereinafter) is an environmental and social risk management tool provided by the IFC for its investment and financing clients and is also one of the major applicable standards of the Equator Principles. As the global influence of the Equator Principles has continued to rise, more and more Equator Principles Financial Institutions (EPFI) have been applying the Performance Standards in their assessments of environmental and social impacts. Under this backdrop, the Performance Standards have become the world's leading system and tool for environmental and social risk management.

The IFC Performance Standards encompass eight topics as described in Table 3-2 below. Given that South Africa has a complex and well-balance environmental regulatory system, the IFC Performance Standards are wholly addressed in the NEMA, 1998, as amended, framework.

For reference purposes the Project Applicant, will be referred to as the 'Borrower' in Table 3-2.

The project will not have adverse impacts on PS5: Land Acquisition and Involuntary Resettlement and PS7: Indigenous Peoples as there is no displacement or resettlement, and none such indigenous people are found in the proposed development area of influence.

**TABLE 3-2 DESCRIPTION OF THE IFC PERFORMANCE STANDARDS**

PS Description	Project Applicability
<p><b>Performance Standard 1:</b> Assessment and Management of Environmental and Social (E&amp;S) Risks and Impacts  <b>Objective:</b> Underscores the importance of identifying E&amp;S risks and impacts and managing E&amp;S performance throughout the life of a project.</p>	<p>Borrowers are required to manage the environmental and social performance of their business activity, which should also involve communication between the Borrower/Investee, its workers and the local communities directly affected by the business activity. This requires the development of a good management system, appropriate to the size and nature of the business activity, to promote sound and sustainable environmental and social performance as well as lead to improved financial outcomes.</p> <p>Section 2 of Chapter 1 of the NEMA, as amended, provides details of the environmental management principles that should be adhered to during the entire project life. Chapter 6 of the NEMA EIA Regulations, 2014 (as amended) outlines the requirements for Public Participation in respect of a project. This document represents the S&amp;EIA process (equitable to an ESIA) undertaken for the proposed development, and comprehensively assesses the key environmental and social impacts and complies with the requirements of the NEMA EIA Regulations, 2014 (as amended). The proposed development will be managed in terms of environmental and social impacts through an approved Environmental Management Programme (EMPr) which is drafted as part of the EIA process. The following have been included as part of this Assessment:            Description of relevant Policy;            Identification of Risks and Impacts;            EMPr (included in the EIA phase);            Requirements for Monitoring and Review;            Stakeholder Engagement as part of PPP;            External Communication and Grievance Mechanism;            and            Recommendation for ongoing Reporting to Affected Communities.</p>
<p><b>Performance Standard 2:</b> Labour and Working Conditions  <b>Objective:</b> Recognizes that the pursuit of economic growth through employment creation and income generation should be balanced with protection of basic rights for workers.</p>	<p>For any business, its workforce is a valuable asset, and a sound worker-management relationship is a key component of the overall success of the enterprise. By protecting the basic rights of workers, treating workers fairly and providing them with safe and healthy working conditions, Borrowers can enhance the efficiency and productivity of their operations and strengthen worker commitment and retention.</p> <p>Whilst PS 2 is applicable to the proposed development, it will not be addressed in detail in this report as Labour and Working conditions are typically addressed prior to construction, once EA has been awarded. Recommendations are provided concerning development of a detailed Human Resources (HR) and Occupational Health and Safety (OHS) system by the Applicant. In terms of the proposed development, construction will require the appointment of an EPC contractor (and others) for completion. Appointment of contactors and employees will be 'fair and equal', and workers will be provided with a safe, healthy and inclusive work environment. The EMPr will incorporate the requirements for compliance with local and international Labour and Working legislation and good practice on the part of the contractors.</p>
<p><b>Performance Standard 3:</b> Resource Efficiency and Pollution Prevention  <b>Objective:</b> Recognizes that increased industrial activity and urbanization often generate higher levels of air, water and land pollution, and that there are efficiency opportunities.</p>	

PS Description	Project Applicability
<p>Increased industrial activity and urbanization often generate increased levels of pollution to air, water and land that may threaten people and the environment at the local, regional and global level. Borrowers are required to integrate pollution prevention and control technologies and practices (as technically and financially feasible as well as cost-effective) into their business activities.</p>	<p>The Project is not likely to have many large-scale and long-term impacts related to pollution. Measures to address air, water and land pollution will be contained in the EMPr. There are no material resource efficiency issues associated with the proposed development and the EMPr will include general resource efficiency measures.</p> <p>The project is not greenhouse gas (GHG) emissions intensive and the detailed assessment and reporting of emissions is not required. This project, however, seeks to facilitate resource efficiency and pollution prevention by contributing to the South African green economy. The project will not release industrial effluents and waste generation will be managed according to the EMPr. Hazardous materials are not a key issue; small quantities of construction materials (oil, grease, diesel fuel etc.) are the only wastes expected to be associated with the project.</p> <p>Land contamination of the site from previous land use is not a concern as the project area is mostly an agricultural area where low intensity agriculture / grazing is practiced.</p>
<p><b>Performance Standard 4: Community Health, Safety, and Security</b>  <b>Objective:</b> Recognizes that projects can bring benefits to communities but can also increase potential exposure to risks and impacts from incidents, structural failures, and hazardous materials.</p>	
<p>Business activities can increase the potential for community exposure to risks and impacts arising from equipment accidents, structural failures and releases of hazardous materials as well as impacts on a community's natural resources, exposure to diseases and the use of security personnel. Borrowers are responsible for avoiding or minimizing the risks and impacts to community health, safety and security that may arise from their business activities.</p>	<p>The requirements for PS 4 have been addressed in this report and will be managed in accordance with the EMPr.</p> <p>It is understood that the project infrastructure and equipment will be designed to good industry standards to minimise risks to communities, however a community health and safety plan should be compiled by the Applicant prior to construction to meet the requirements of IFC Performance Standard 4 (Community Health, Safety and Security). To ensure compliance with PS 4, Applicant will need to evaluate the risks and impacts to the health and safety of the affected community during the design, construction and operation of the proposed development and establish preventive measures to address them in a manner commensurate with the identified risks and impacts as contained in this report. Such measures need to adhere to the precautionary principle for the prevention or avoidance of risks and impacts over minimization and reduction.</p>
<p><b>Performance Standard 5: Land Acquisition and Involuntary Resettlement</b>  <b>Objective:</b> Applies to physical or economic displacement resulting from land transactions such as expropriation or negotiated settlements.</p>	
<p>Land acquisition due to the business activities of a Borrowers may result in the physical displacement (relocation or loss of shelter) and economic displacement (loss of access to resources necessary for income generation or as means of livelihood) of individuals or communities. Involuntary resettlement occurs when affected individuals or communities do not have the right to refuse land acquisition and are displaced, which may result in</p>	<p>Not Applicable</p>

PS Description	Project Applicability
<p>long-term hardship and impoverishment as well as environmental damage and social stress. Borrowers are required to avoid physical or economic displacement or minimize impacts on displaced individuals or communities through appropriate measures such as fair compensation and improving livelihoods and living conditions.</p>	
<p><b>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>  <b>Objective:</b> Promotes the protection of biodiversity and the sustainable management and use of natural resources.</p>	
<p>Protecting and conserving biodiversity (including genetic, species and ecosystem diversity) and its ability to change and evolve, is fundamental to sustainable development. Borrowers are required to avoid or mitigate threats to biodiversity arising from their business activities and to promote the use of renewable natural resources in their operations.</p>	<p>In terms of protecting and conserving biodiversity, specialists have assessed the impacts of the proposed development within the area of influence and will recommend further measures to prevent/avoid/mitigate these potential impacts during the EIA phase. Specialist methods include a combination of literature review, stakeholder engagement and consultation, and in-field surveys. This substantively complies with the PS 6 general requirements for scoping and baseline assessment for determination of biodiversity and ecosystem services issues. The determination of habitat sensitivity was undertaken within the legal and best practice reference framework for South Africa.</p>
<p>Performance Standard 7: Indigenous Peoples  <b>Objective:</b> Aims to ensure that the development process fosters full respect for Indigenous Peoples.</p>	
<p>Indigenous Peoples are recognized as social groups with identities that are distinct from other groups in national societies and are often among the marginalized and vulnerable. Their economic, social and legal status may limit their capacity to defend their interests and rights to lands and natural and cultural resources. Borrowers are required to ensure that their business activities respect the identity, culture and natural resource-based livelihoods of Indigenous Peoples and reduce exposure to impoverishment and disease.</p>	<p>Not Applicable. As per the international instruments under the United Nations (UN) Human Rights Conventions, no indigenous peoples are present within the study area. The Project does not involve displacement.</p>
<p>Performance Standard 8: Cultural Heritage  <b>Objective:</b> Aims to protect cultural heritage from adverse impacts of project activities and support its preservation.</p>	
<p>Aims to protect cultural heritage from adverse impacts of project activities and support its preservation.</p>	<p>A cultural heritage impact assessment and paleontological impact assessment will be undertaken for the proposed development. Consultation has been undertaken with the SAHRA and will continue during the EIA phase.</p>



## 4. SCOPE OF WORK AND EIA PHASE METHODOLOGY

The EIA process formally commenced with notifying the CA, in this case the DFFE, of the proposed development through the submission of an application form. The EAP, along with the team of technical specialists, commenced the scoping phase to make informed decisions of the appropriate "scope" of the EIA process. The existing environmental baseline of the site proposed for development was established during this phase through a desktop assessment and site visits. The type of development was considered and its anticipated impacts on the existing environment informed the specialists' studies to be undertaken. The methodology of how these impacts have been assessed within the EIA phase is also determined. The EIA Phase was undertaken in line with the approved PSEIA. The environmental impacts, mitigation and closure outcomes as well as the residual risks of the proposed activity has been set out in the EIA report.

A Draft Scoping Report (DSR) (ERM, February 2024) for the proposed development was made available for public and stakeholder comment for a prescribed 30-day consultation period. All comments received in response to the DSR were considered and as appropriate, incorporated into the FSR and Plan of Study for EIA (PSEIA). The FSR and PSEIA (ERM, April 2024) were then submitted to the DFFE for approval. Interested and Affected Parties (I&APs) were able to review FSR and PSEIA as submitted to the DFFE.

The FSR presented and assessed the initial proposed WEF layout and associated infrastructures of the Khoe WEF and its associated infrastructure. In May 2024, the DFFE accepted the FSR. The results of the specialists' scoping assessments, DFFE comments on the FSR, and other technical and financial constraints for the proposed development site were taken into consideration and a revised preferred layout was produced.

This EIA report presents and assesses a revised mitigated layout for the proposed development and will be made available for a prescribed 30-day consultation period. Any comments received will be considered and incorporated as applicable into a Final EIA report. Once a Final EIA report has been submitted, the DFFE will make a decision within 107 days on whether to grant or refuse EA. I&APs will be notified of the availability of the Final EIA report for their review as per the FSR.

### 4.1 DFFE ENVIRONMENTAL SCREENING TOOL

In terms of GN R960 (promulgated on 5 July 2019) and Regulation 16 (1)(b)(v) of the EIA Regulations, 2014 (as amended), the submission of a Screening Report generated from the national web based environmental screening tool is compulsory for the submission of Basic Assessment (BA) and EIA applications in terms of Regulation 19 and 21 of EIA Regulations, 2014 (as amended). The Screening Report generated for the proposed development is included in Volume II of this Report.

The screening report was generated based on the selected classification, i.e., Infrastructure | Electricity | Generation | Renewable | Solar | PV. No intersections with Environmental Management Frameworks (EMF) were found. In terms of development incentives, restrictions, exclusions or prohibitions, no intersections with any development zones were found.

Based on the selected classification to produce the screening tool report, and the environmental sensitivities of the development footprint, the screening report generates a list of specialist

assessments identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study.

Table 4-1 provides a summary of the specialist assessments identified by the screening tool reports, and the response to each assessment in terms of the proposed development.

Specialist assessments undertaken (Volume II) have considered the results of the DFFE Screening Tool in their terms of reference.

**TABLE 4-1 ENVIRONMENTAL THEMES FROM SCREENING TOOL WHICH NEEDS TO ADHERE TO IN THE ENVIRONMENTAL AUTHORISATION PROCESS**

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
Agriculture Theme	Protocol for the Specialist Assessment and Minimum Report Content Requirements of Environmental Impacts on Agricultural Resources by Onshore Wind and/or Solar Photovoltaic Energy Generation Facilities where the Electricity Output is 20 MW or more, gazetted on 20 March 2020. This protocol replaces the requirements of Appendix 6 of the Environmental Impact Assessment Regulations.	High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>The site is classified as ranging from low to high agricultural sensitivity by the screening tool. The site sensitivity verification verifies those parts of the site that are indicated as cropland in this assessment as being of high agricultural sensitivity, and the rest of the site as being of low to medium agricultural sensitivity.</p>		
Landscape / Visual Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Very High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>Overall, the significance of the visual impacts associated with the proposed Khoe Wind Energy Facility is expected to be very high to high as a result of the generally undeveloped character of the landscape and its inability to absorb changes of this magnitude. Additionally, the facility would be visible within an area that contains certain sensitive visual receptors who already consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors</p>		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	include people travelling along the R318 and secondary roads, as well as, residents of rural homesteads and tourists passing through or holidaying in the region.		
Archaeological and Cultural Heritage Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Low Sensitivity	Low Sensitivity
	Comment: The screening tool report shows the archaeological and heritage sensitivity to be low throughout the study area. The site visit confirmed that the site is a heritage environment of variable sensitivity but that significant impacts on archaeological resources arising from the project are unlikely.		
Noise Theme	Protocol for specialist assessment and minimum report content requirements for Noise Impacts, gazetted on 20 March 2020.	Very High Sensitivity	Very High Sensitivity
	Comment: There are permanent or temporary residential activities, and these locations are located within 2,000m from the area where wind turbines may be developed. These residential activities are considered to be noise-sensitive and the areas are considered to have a "Very High" sensitivity to noise.		
Flicker Theme	Verification requirements where a specialist assessment is required but no Specific Assessment Protocol has been prescribed, gazetted 20 March 2020.	Very High Sensitivity	Moderate Sensitivity
	Comment: According to the Visual Impact Assessment, the significance of shadow flicker is anticipated to be moderate.		
Paleontology Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no	Very High Sensitivity	Very High Sensitivity

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	<p>specific assessment protocol has been prescribed, gazetted on 20 March 2020.</p> <p>Comment: This development area was allocated a rating of Very High Sensitivity by the SAHRIS Palaeosensitivity Map and DFFE Screening Tool. However, a paleontological assessment for the adjacent proposed Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual paleontological sensitivity of that project area is much lower than indicated on the SAHRA map.</p>		
Terrestrial Biodiversity Theme	<p>Protocol for the Specialist Assessment and minimum report content requirements for Environmental Impacts on Terrestrial Biodiversity, gazetted on 20 March 2020.</p> <p>Comment: The site is predominantly classified as Low Sensitivity by the Department of Forestry, Fisheries and the Environments (DFFE) Online Screening Tool (ST), while remaining areas are classified as Very High Sensitivity. This is due to the intersection of the PAOI with various important biodiversity areas including Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and Freshwater Ecosystem Priority Areas (FEPA) associated with the Langeberg-Wes Mountain Catchment. It is the Specialist’s opinion that the DFFE Online ST assessment of Very High Sensitivity in the Terrestrial Biodiversity Theme is correct, and a Specialist EIA Report must be submitted.</p>	Very High Sensitivity	Very High Sensitivity
Aquatic Biodiversity Theme	<p>Protocol for the Specialist Assessment and minimum report content requirements for Environmental Impacts on Aquatic Biodiversity, gazetted on 20 March 2020.</p> <p>Comment: The DFFE Screening Tool, the site contains areas of very high sensitivity due to the presence of: Critical Biodiversity Areas (CBA) 1: Aquatic</p>	Very High Sensitivity	Very High Sensitivity

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	<p>Ecological Support areas (ESA) 1: Aquatic</p> <p>The specialist agrees with the environmental sensitivities identified on site. The findings have been informed by a site visit undertaken by Dr Brian Colloty in 1-3 September 2023. Some of the systems observed are sensitive and thus shown in this assessment as No-Go i.e. Very High sensitivity.</p>		
Avian Theme	<p>Protocol for the specialist assessment and minimum report content requirements for the Environmental Impact Assessment Regulations, 2014 (GNR 326, 7 April 2017) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).</p>	High Sensitivity	High Sensitivity
	<p>Comment: The DFFE Screening Tool (Animal Theme) classified the area as of High Sensitivity (based on the presence of four Red Data species). Birdlife South Africa’s national Avian Sensitivity Map suggests low to medium-high sensitivity for birds and Wind Energy Facility. Inspection of the national bird atlas data set (SABAP 2) including our own species records added an additional Red Data species (Lanner Falcon <i>Falco biarmicus</i>) and other collision-prone species. We, thus, concur with the Screening Tool’s assessment that the site is of High Sensitivity, and the data and models that follow allow us to reduce risk by constructing a detailed spatial picture of the risks to the Priority birds present.</p>		
Civil Aviation Theme	<p>Protocol for the specialist assessment and minimum report content requirements for Environmental Impacts on Civil Aviation Installations, gazetted on 20 March 2020.</p>	High Sensitivity	High Sensitivity
	<p>Comment: The Screening Tool Report indicated that there are Civil Aviation Installations within 8km of the proposed development. As such, the Civil Aviation Theme is allocated a High Sensitivity rating. The Civil Aviation Authority has requested that the Project Proponent applies or Obstacle</p>		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	approval by following the process outlined in their website. This will be done as required prior to the commencement of construction activities.		
Defence Theme	Protocol for the specialist assessment and minimum report content requirements for Environmental Impacts on Defence Installations, gazetted on 20 March 2020.	Medium Sensitivity	Low Sensitivity
	Comment: Site verification confirms the low sensitivity. During the public consultation, the South African National Defense Force (SANDF) was consulted by the EAP / Project Applicant to confirm that there will be no impact on the defense installation of the development area and immediate surrounds.		
Radio Frequency Interference (RFI) Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Low Sensitivity	Low Sensitivity
	Comment: Site verification confirms the low sensitivity. During the public consultation, the South African Radio Astronomy Observatory (SARAO) was consulted by the EAP / Project Applicant to confirm that there will be no impact on the Radio Frequency Interference (RFI) within the immediate surrounds of the development.		
Geotechnical Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined	Not Determined
	Comment: Geotechnical assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. The EAP is of the opinion that a Geotechnical Assessment for the development can and will only be undertaken prior to the		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	commencement of the construction phase. The EAP has not included this assessment as part of the application process.		
Plant Species Theme	Protocol for specialist assessment and minimum report content requirements for Environmental Impacts on Terrestrial Plant Species, gazetted on 20 March 2020.	High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>It is the Specialists opinion that SCC are likely present on site, therefore the DFFE Online ST Assessment of High Sensitivity in the Plant Species Theme for some areas is accurate. High sensitivity areas are predominantly those listed as CBAs. All other areas are either Medium Sensitivity or Low Sensitivity.</p>		
Animal Species Theme	Protocol for specialist assessment and minimum report content requirements for Environmental Impacts on Terrestrial Animal Species, gazetted on 20 March 2020.	High Sensitivity	High Sensitivity
	<p>Comment:</p> <p>Two non-avian SCCs were included in the Screening Tool output, with Insecta-Aloeides caledoni and Mammalia-Bunolagus monticularis listed as 'Medium' sensitivity. The desktop study revealed two SCCs potentially present in the study site that were not included in the Screening Tool output, namely Grey Rhebok (Pelea capreolus) and Leopard (Panthera pardus). Grey Rhebok were confirmed as present within the project site, while Riverine Rabbit was confirmed as present in the surrounding area but not within the project boundary. Leopard were considered to have a high probability of utilizing at least parts of the study site on occasion. The Caledon Copper (Aloeides caledoni) is considered Least Concern and unlikely to occur in areas identified for development.</p> <p>From an avifaunal perspective, it can be confirmed the site is of High Sensitivity, and the data and Collision Risk Models allows for the reduce risk by constructing a detailed spatial picture of the risks to the Priority birds present.</p>		
Bats Animal Theme	Site Sensitivity Verification Requirements where a Specialist	High Sensitivity	High Sensitivity



Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.		
	Comment: The Department of Forestry, Fisheries, and the Environment’s (DFFE) Screening Tool Report showed a high sensitivity to the bats (wind) theme. The required Site Sensitivity Verification Report confirmed that the proposed Khoe WEF has high sensitivity in terms of bats, which had been confirmed by the bat monitoring exercise due to general high bat activity.		
Socio-Economic Assessment	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined.	Not Determined.
	Comment: Socio-economic assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. A full impact assessment was undertaken by the specialist for the EIA phase of the development.		
Traffic Assessment	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined	Medium to Low Sensitivity
	Comment: Traffic assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. A desk-based traffic assessment was undertaken for the proposed development as well as a site visit. The outcome of the specialist assessment confirms that the proposed development and final layout can be supported from a traffic engineering point of view. The base year and forecast year road capacity has indicated that the proposed development will have little to no significant impact on the existing road network capacity and intersection operational performance.		

## 4.2 SPECIALIST METHODOLOGY

To evaluate the potential environmental impacts, information relating to the existing environmental conditions were collected through field and desktop research; this is known as the baseline. Climate change is expected to affect the proposed development site over the lifetime of the proposed development; however, the nature, scale and severity of climate change effects are uncertain. Given this uncertainty, the existing environment is assumed to remain constant throughout the lifetime of the proposed development, and forms the current and future baseline for the impact assessments.

### 4.2.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

The assessment was based on an on-site investigation of the soils and agricultural conditions conducted on 24 October 2023. It was also informed by existing climate, soil, and agricultural potential data for the site. The aim of the on-site assessment was to:

- Ground-truth cropland status;
- Ground truth the land type soil data and achieve an understanding of the general range and distribution patterns of different soil conditions across the site; and
- Gain an understanding of overall agricultural production potential across the site.

Soils were assessed based on the investigation of existing soil exposures in combination with indications of the surface conditions and topography. Soils were classified according to the South African soil classification system (Soil Classification Working Group, 1991).

This level of soil assessment is considered entirely adequate for an understanding of on-site soil potential for the purposes of a wind farm assessment. For this purpose, only an understanding of the general range and distribution patterns of different soil conditions across the site is required. A more detailed soil survey would be extremely time consuming and impractical to conduct, given the very large assessment area, and would not provide any additional data that would add value to the assessment of the agricultural impact of the wind farm.

This is because a wind farm extends over a very large surface area. The layout design of a wind farm is complex and there are multiple interacting factors that determine the turbine locations that will ensure the viability of the wind farm. Each turbine influences the amount of wind that the other turbines receive. Therefore, the location of one turbine cannot simply be shifted without requiring other turbines to be shifted as well, to retain the viability of all the turbines. To shift turbines to account for variation in soil conditions would be extremely complex and would require a level of soil mapping detail across the whole wind farm area that would be practically impossible to achieve. Even with this level of detail, it is highly unlikely that it would have any influence on agricultural impact.

An assessment of soils and long-term agricultural potential is in no way affected by the season in which the assessment is made, and therefore the date on which this assessment was done has no bearing on its results

### 4.2.2 NOISE

This study considered local regulations and both local and international guidelines, using the terms of reference proposed by SANS 10328:2008 for a comprehensive Environmental Noise

Impact Assessment ('ENIA') and as proposed by the requirements specified in the Assessment Protocol for Noise that were published on 20 March 2020, in Government Gazette 43110, GN 320. The study also considered the noise limits as proposed by IFC which is based on studies completed by the World Health Organization ('WHO').

Ambient sound levels were measured previously in areas with a similar developmental character. The data indicate ambient sound levels are generally low, with faunal and other natural sounds as the main source of noise in the area. Wind-induced noises influence ambient sound levels during periods with increased winds, with the ambient sound levels determined by numerous factors (vegetation type and density, faunal species in the area, etc.).

Due to a few wind turbines proposed within an area with a potential high sensitivity to noise, a full environmental noise impact study was conducted. The initial assessment was a desktop study and was assessed in terms of the Noise Sensitivity Theme using the National Web-based Environmental Screening Tool. Basic predictive models were also used to identify potential issues of concern.

Residential areas and potential noise-sensitive developments/receptors/communities (NSR) were identified using aerial images up to 2,000 m (recommendation SANS 10328:2003) from potential turbine locations. The statuses of these structures were verified during the site in December 2022 and September 2023 during periods with low winds. The ambient sound levels were measured in terms of Government Notice Regulation 320 of March 2020.

#### 4.2.3 FRESHWATER AND WETLANDS (AQUATICS)

The methodology used by the specialist was developed with the renewable industry in mind, coupled with the minimum requirements stipulated by DFFE and the Department of Human Settlement, Water and Sanitation (DHSWS). The study followed the approaches of several national guidelines regarded for aquatic assessments. These were then modified by the specialist, to provide a relevant mechanism of assessing the present state of the study systems applicable to the specific environment, and in a clear and objective manner, assess the potential impacts associated with the proposed development site. The methodology also included the considerations of the Macfarlane & Bredin (2017) buffer models and revisions to the SANBI National Wetland Inventory.

The assessment made use of the National Wetland Classification System (NWCS) approach and included delineating any natural waterbodies and assessing the potential consequences of the proposed development on the surrounding watercourses.

The findings of the specialist assessment were supported by baseline data during a site visit, 1-3 September 2023, after heavy rainfall and the onset of the growing season.

The aquatic report was produced to meet the criteria to fulfil a Specialist Assessment Report as portions of the proposed development area were rated as very high sensitivity as per the DFFE Screening Tool.

## 4.2.4 TERRESTRIAL BIODIVERSITY

### 4.2.4.1 DESKTOP STUDY

The desktop study was initiated by obtaining the proposed development area's expected sensitivity in the Terrestrial Biodiversity Theme using the DFFE Online Screening Tool (ST)<sup>6</sup>, which is informed by the Western Cape Biodiversity Spatial Plan<sup>7</sup>. The recorded land-use of the proposed PAOI was determined using the latest available South African National Land Cover (SANLC, 2020)<sup>8</sup> spatial datasets and Quantum Geographic Information System (QGIS). These data were compared with previously identified important biodiversity areas in proximity to the Project by consulting the following resources:

- The Red List of Ecosystems (RLE, 2022) spatial dataset<sup>9</sup> to determine the Red List Status and Category of ecosystem(s) within the proposed PAOI.
- The Breede valley Key Biodiversity Areas (KBA) spatial dataset<sup>10</sup> was used to determine the presence of Critical Biodiversity Areas (CBA1/2), Ecological Support Areas (ESA1/2), Protected Areas (PA) and Other Natural Areas (ONA) within the proposed PAOI.
- The SANBI 2018 Beta Vegetation Map of South Africa, Lesotho and Swaziland Spatial Dataset<sup>11</sup> to determine the Vegetation Units present within the proposed PAOI.
- The 2011 National Freshwater Ecosystem Priority Areas (NFEPA) river<sup>12</sup> and wetland<sup>13</sup> datasets.
- The International Union for the Conservation of Nature's (IUCN) Red List<sup>14</sup> to confirm the international Red List Status and Category of plant species that have been recorded in the proposed PAOI.

In addition, the resources below were consulted to compile a list of plant and animal SCC that are potentially present within the proposed development area footprint:

- The SANBI Plants of Southern Africa (POSA) Brahms database<sup>15</sup> to identify plant species that have been recorded in the proposed PAOI.
- The Biodiversity and Development Institute's Virtual Museum database<sup>16</sup> to determine the presence of plant and animal species that have been recorded in the proposed PAOI.
- The Global Biodiversity Information Facility (GBIF) database<sup>17</sup> to determine the presence of plant and animal species that have been recorded in the proposed PAOI.
- The SANBI Red List of South African Species<sup>18</sup> to confirm the national Red List Status and Category of species that have been recorded in the proposed PAOI.

<sup>6</sup> <https://screening.environment.gov.za/screeningtool/#/pages/welcome>

<sup>7</sup> [https://www.capenature.co.za/uploads/files/protected-area-management-plans/SANBI\\_WCBSP-Handbook.pdf](https://www.capenature.co.za/uploads/files/protected-area-management-plans/SANBI_WCBSP-Handbook.pdf)

<sup>8</sup> [https://eqis.environment.gov.za/sa\\_national\\_land\\_cover\\_datasets](https://eqis.environment.gov.za/sa_national_land_cover_datasets)

<sup>9</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/6715>

<sup>10</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/641>

<sup>11</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/670>

<sup>12</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/397>

<sup>13</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/395>

<sup>14</sup> <https://www.iucnredlist.org/>

<sup>15</sup> <https://posa.sanbi.org/sanbi/Explore>

<sup>16</sup> <https://vmus.adu.org.za/>

<sup>17</sup> <https://www.gbif.org/>

<sup>18</sup> <http://speciesstatus.sanbi.org/>

The International Union for the Conservation of Nature's (IUCN) Red List<sup>19</sup> to confirm the international Red List Status and Category of plant species that have been recorded in the proposed PAOI.

#### 4.2.4.2 SITE VERIFICATION

The specialist spent two days on site (28 - 29 June 2022) in conjunction with the terrestrial animal specialist retrieving camera trap data and replacing Secure Digital (SD) memory cards to verify the sensitivity of the proposed study area as described by the DFFE Online ST, and land use as described by the SANLC (2020).

An additional site visit was conducted (10 – 16 March 2024) to conduct terrestrial biodiversity surveys to determine species presence and distribution on site in correlation with the Scoping Phase project layout.

#### 4.2.4.3 SITE ECOLOGICAL IMPORTANCE

Habitat sensitivity is determined as a function of several factors including the presence and distribution of SCC, intactness of habitat, extent of impacts, and the capacity of the habitat to withstand and/or recover from disturbance. These factors are assessed on a scale from 'Low' to 'Very High' according to pre-determined conditions and incorporated into a formula to determine the Site Ecological Importance (SEI) for each habitat.

### 4.2.5 FAUNAL

#### 4.2.5.1 DESKTOP STUDY

The output of the Screening Tool was supplemented with outputs from biodiversity databases such as the various atlasing projects of the Virtual Museum<sup>20</sup>, iNaturalist<sup>21</sup> and the GBIF<sup>22</sup> network to determine which additional species may occur in the area. Conservation status was cross-referenced with National<sup>23</sup> and International<sup>24</sup> databases. Publicly available data and published literature were consulted and referenced throughout, where relevant.

#### 4.2.5.2 SITE SURVEY

A total of eleven sampling sites were included in the assessment. Sampling for the Khoe WEF was conducted concurrently with the nearby Hugo WEF as the latter was considered to be representative of the habitats available and likely species in the broader area. Two camera traps were positioned within the proposed project boundary itself (Figure 4-1).

- **Duration:** 44 weeks
- **Date:** 17 February 2022 – 23 December 2022
- **Season:** Late summer, autumn, winter, spring and early summer
- **Relevance:** Sampling was conducting through a wide-range of conditions experienced over the monitoring period, increasing confidence in the outcome of the assessment
- **Effort:** Camera traps were deployed across the site for a combined 612 nights.

<sup>19</sup> <https://www.iucnredlist.org/>

<sup>20</sup> [http://vmus.adu.org.za/vm\\_projects.php](http://vmus.adu.org.za/vm_projects.php)

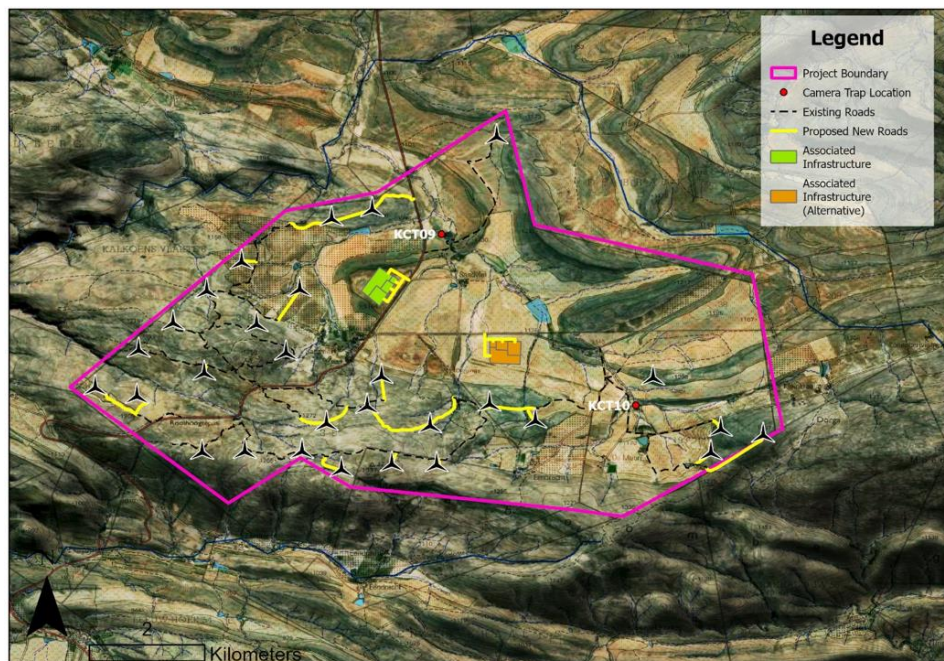
<sup>21</sup> <https://www.inaturalist.org/>

<sup>22</sup> <http://gbif.org>

<sup>23</sup> <http://speciesstatus.sanbi.org/>

<sup>24</sup> <https://www.iucnredlist.org/>

FIGURE 4-1 CAMERA TRAP SAMPLING SITES



Spartan Lumen Dual Flash Scouting Cameras (Model: SR3-CX S39) were utilized in the study to provide high-quality, full-colour, night-time images (i.e. using white-flash) to facilitate positive differentiation between Riverine Rabbit and hares. Passive Infrared (PIR) sensor sensitivity was set to “normal” using the in-camera settings, with a trigger interval (quiet period) of 5 seconds.

#### 4.2.5.3 DATA ANALYSIS

An initial, automated batch classification was on raw image data in R<sup>25</sup> using MegaDetector to classify images into ‘blank’ (i.e. false-triggers) or animal detections. Automatic classifications were manually validated prior to manual species identification. Data was captured following the Camera Trap Metadata Standard (CTMS)<sup>26</sup> and explored following modified methods obtained from the Wildlife Coexistence Lab<sup>27</sup>. Camera Trap labelled ODCT11 was excluded from image analyses as it was set to record video rather than static images and records were therefore considered separately.

<sup>25</sup> R Core Team (2021). R: A language and environment for statistical computing. R Foundation for Statistical Computing, Vienna, Austria. URL <https://www.R-project.org/>

<sup>26</sup> Forrester, T., T. O'Brien, E. Fegraus, P. Jansen, J. Palmer, R. Kays, J. Ahumada, B. Stern and W. McShea. (2016). An Open Standard for Camera Trap Data. *Biodiversity Data Journal*. 4:e10197. <https://doi.org/10.3897/BDJ.4.e10197>

<sup>27</sup> Department of Forest Resources Management, University of British Columbia, 2424 Main Mall, Vancouver, BC, Canada V5T 1Z4

#### 4.2.5.4 SENSITIVITY MAPPING

The 2020 South African National Land-Cover (SANLC) dataset, 2022 Red List of Ecosystems for terrestrial realm for South Africa, publicly available satellite imagery, normalized difference vegetation index (NDVI), Screening Tool output and field observations of vegetative cover were considered in combination with camera trap survey data to delineate habitats relevant to the impacts of the proposed development type and animal SCCs.

#### 4.2.6 FLORA

##### 4.2.6.1 DESKTOP STUDY

The desktop study was initiated by obtaining the proposed development area's expected sensitivity in the Plant Theme using the DFFE ST<sup>28</sup>. The recorded land-use of the proposed PAOI was determined using the latest available South African National Land Cover (SANLC, 2020)<sup>29</sup> spatial datasets and Quantum Geographic Information System (QGIS). These data were compared with previously identified important biodiversity areas in proximity by consulting the following resources:

- The Red List of Ecosystems (RLE, 2022) spatial dataset<sup>30</sup> to determine the Red List Status and Category of ecosystem(s) within the proposed PAOI.
- The Breede Valley Key Biodiversity Areas (KBA) spatial dataset<sup>31</sup> was used to determine the presence of Critical Biodiversity Areas (CBA1/2), Ecological Support Areas (ESA1/2), Protected Areas (PA) and Other Natural Areas (ONA) within the proposed PAOI.
- The SANBI 2018 Beta Vegetation Map of South Africa, Lesotho and Swaziland Spatial Dataset<sup>32</sup> to determine the Vegetation Units present within the proposed PAOI.
- In addition, the resources below were consulted to compile a list of plant SCC that are potentially present within the proposed development area footprint:
- The SANBI POSA Brahm's database<sup>33</sup> to identify plant species that have been recorded in the proposed PAOI.
- The Biodiversity and Development Institute's Virtual Museum database<sup>34</sup> to determine the presence of plant species that have been recorded in the proposed PAOI.
- The Global Biodiversity Information Facility (GBIF) database<sup>35</sup> to determine the presence of plant species that have been recorded in the proposed PAOI.
- The SANBI Red List of South African Species<sup>36</sup> to confirm the national Red List Status and Category of plant species that have been recorded in the proposed PAOI.
- The Red List of South African Plant Species<sup>37</sup> to confirm the national Red List Status and Category of plant species that have been recorded in the proposed PAOI.

<sup>28</sup> <https://screening.environment.gov.za/screeningtool/#/pages/welcome>

<sup>29</sup> [https://egis.environment.gov.za/sa\\_national\\_land\\_cover\\_datasets](https://egis.environment.gov.za/sa_national_land_cover_datasets)

<sup>30</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/6715>

<sup>31</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/641>

<sup>32</sup> <http://bgis.sanbi.org/SpatialDataset/Detail/670>

<sup>33</sup> <https://posa.sanbi.org/sanbi/Explore>

<sup>34</sup> <https://vmus.adu.org.za/>

<sup>35</sup> <https://www.gbif.org/>

<sup>36</sup> <http://speciesstatus.sanbi.org/>

<sup>37</sup> <http://redlist.sanbi.org/index.php>



- The International Union for the Conservation of Nature's (IUCN) Red List<sup>38</sup> to confirm the international Red List Status and Category of plant species that have been recorded in the proposed PAOI.

#### 4.2.6.2 SITE VERIFICATION

The specialist spent two days on site (28 - 29 June 2022) in conjunction with the terrestrial animal specialist retrieving camera trap data and replacing Secure Digital (SD) memory cards to verify the sensitivity of the proposed study area as described by the DFFE Online ST, and land-use as described by the SANLC (2020).

An additional site visit was conducted (10 – 16 March 2024) to conduct terrestrial biodiversity surveys to determine species presence and distribution on site in correlation with the Scoping Phase project layout.

#### 4.2.6.3 SITE ECOLOGICAL IMPORTANCE

Habitat sensitivity is determined as a function of several factors including the presence and distribution of SCC, intactness of habitat, extent of impacts, and the capacity of the habitat to withstand and/or recover from disturbance. These factors are assessed on a scale from 'Low' to 'Very High' according to pre-determined conditions and incorporated into a formula to determine the Site Ecological Importance (SEI) for each habitat.

#### 4.2.7 AVIFAUNA

In accordance with the Best Practice guidelines for assessing and monitoring the impact of wind energy facilities on birds in southern Africa (Jenkins et 2015), four seasonally timed site visits across the entire 8,184 ha study area were undertaken to record all flights and heights of Priority species.

A 12-month monitoring programme for the developable area was undertaken. The report and monitoring programme followed the "Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Avifaunal Species by Onshore Wind Energy Generation Facilities where the Electricity Output is 20 Megawatts or More" (Government Gazette 43110, GN 320, 20 March 2020).

All areas were covered, and species flights recorded, these are shown in Figure 4-2 below. Methods for the Vantage Point (VP) monitoring was undertaken according to the BARESG monitoring protocols (Jenkins et al. 2015).

##### 4.2.7.1 VANTAGE POINT SURVEYS

VP observations are the most important form of data collection for avifaunal surveys on wind farms (Jenkins et al., 2015). To cover the full extent of the proposed site whilst ensuring minimal overlap between VPs, a total of 6 VPs, each within a 1.5 km viewshed, were overlaid on the proposed study site. Subject to weather conditions, each VP was surveyed over three days in six-hour sessions (18-hours in total per VP) during either early morning or afternoon hours to ensure that the full range of bird-active hours was monitored.

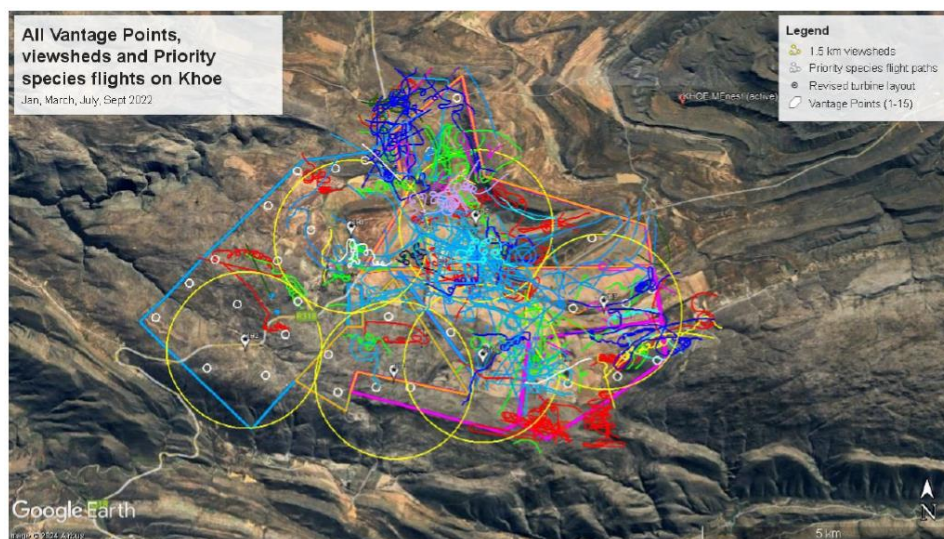
"Priority" species are defined as the top 100 most collision-prone species (Ralston-Paton et al., 2017). On site, when a Priority species is identified, the flight height and behaviour are recorded every 15 seconds until the bird leaves the VP viewshed or lands. Flight paths are

<sup>38</sup> <https://www.iucnredlist.org/>



drawn onto printed A3 maps with associated variables recorded on the reverse of the data sheets. These include species, number of individuals, age, sex, flight duration, flight height in metres at 15 second intervals, flight behaviour, and habitat details. Flight paths and associated data are later transcribed into digital format for further mapping and analysis. Examples of the flights of all Priority species are shown in Figure 4-2 and are undertaken over four equally spaced seasons for the proposed Khoe WEF. This approach ensured that all biologically important periods were covered: summer for full complement of migrants, autumn for migration, winter for start of the breeding season for large eagles, and spring for the breeding of most other species (harriers, cranes).

**FIGURE 4-2 THE PROPOSED KHOE WIND ENERGY FACILITY, INDICATING ALL VANTAGE POINTS (= WHITE BALLOONS), ASSOCIATED 1.5-KM VIEWSHEDS (= YELLOW CIRCLES), AND THE REVISED (29) TURBINE POSITIONS (= SMALL BLACK/WHITE CIRCLES)**



#### 4.2.7.2 COLLISION RISK MODELLING (CRM)

Collision Risk Modelling (CRM), developed by Band et al. (2007), has been used for many years to more precisely assess the risk to birds as they pass through a wind energy facility environment. More sophisticated models that take uncertainty into account have since appeared (New et al. 2015), fine-tuning the analysis. It is based on a combination of:

- The probability of collision;
- The birds' exposure to turbines (in time and space); and
- A measure of the spatial and temporal extent over which a bird is at risk of collision (the hazardous footprint).

By incorporating uncertainty into the equations, through a Bayesian modelling approach, more realistic estimates of the risk of fatalities are incorporated into the new model (New et al. 2015). The modelling used here has been taken a quantum leap forward by Dr Robin Colyn, as it also incorporates Habitat Suitability Models (HSM), terrain, topography and seasonality.

Collision Risk Modelling was used in this study to fine-tune areas where Priority collision prone species are most likely to impact future wind turbines. This work is only the second time that CRM has been undertaken for an entire wind energy facility in southern Africa, across a suite of collision-prone species identified on site.

#### 4.2.7.3 GENERAL RISK ANALYSIS

The following variables were used to inform the CRM:

- Flight density (Passage Rates of flights per hour for each species);
- Flight heights (proportion of time spent within the blade-swept (BSA) or risk area);
- Habitats;
- Proposed turbine specifications;
- Topography (some raptors use slope and lift in their daily flights); and
- Seasonality (temporal use).

The result is a quantitative prediction of high-risk flights, presented as a proportion of time spent within the BSA. These are presented as classes from 1 (lowest risk) to 8 (highest risk).

#### 4.2.7.4 SITE SPECIFIC RISK ANALYSIS

Time spent in the BSA does not alone predict collision risk. Several other factors could influence collision-risk. For example, increased exposure to a turbine(s) could increase collision risk.

The CRM was taken one step further by including the following inputs:

- Turbine positions available at the time (possible indicator of turbine exposure);
- Conservation status (whereby Red Data species were given a higher weighting than Least Concern Species); and
- The turbine collision propensity of individual species derived from empirical data provided from South African Wind energy facility fatalities (Perold et al. 2020). More fatalities result in a higher ranking.

The result of this second phase of modelling is a "heat map" of the cluster showing the relationship between collision-risk of all Priority species and the proposed turbine layout. By observing the change in colours across the map, one can gauge the change in collision-risk.

Once the collision-risks had been represented spatially, the next step is to determine which risk classes (colours) were acceptable for development, which required mitigation, and which required avoidance altogether.

Because there are few established thresholds for acceptable impacts on bird species in South Africa, this was mainly based on subjective opinion. However, for some species such as the Black Harrier, we know that the death of three to five more adults per year would send the population to extinction in approximately 75 years (Cervantes et al. 2022). Thus, for such precarious species we set the bar at zero fatalities for Black Harriers.

#### 4.2.8 BATS

##### Desktop Investigation

A desktop study was conducted for the site, using the information provided by the representative of the developer, as well as information gathered through a literature review. Although there are

no other wind farms within a 30 km radius, other renewable energy developments were noted and consulted as appropriate. Bat species lists of nearby proposed wind farms, which is the closest wind farm applications, were consulted and compared to Hugo WEF.

We value local knowledge and discussing the bat situation with people who are familiar with the area and seasonal changes, this could provide valuable knowledge and input into the process. Therefore, interviews were conducted with the landowners staying permanently on the farm.

### Passive Acoustic Monitoring Systems

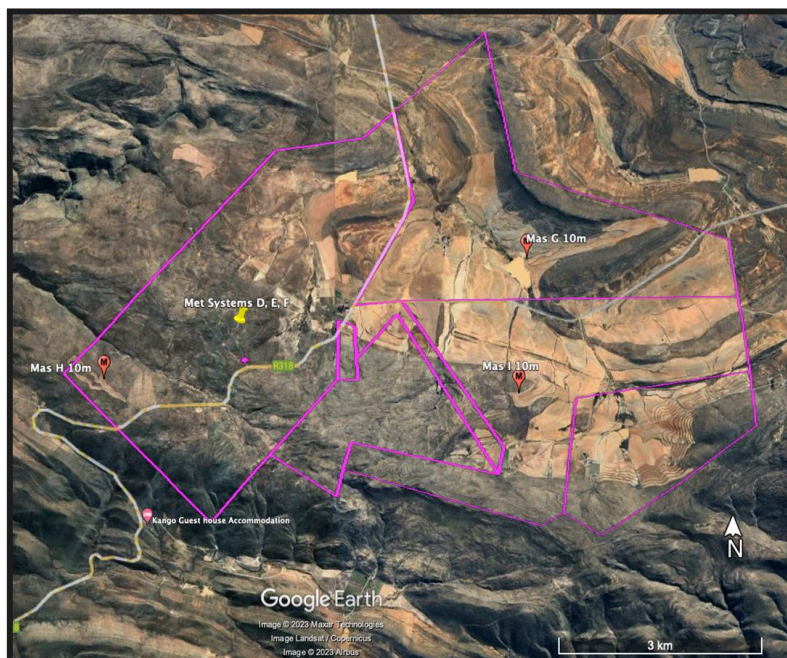
The monitoring systems consisted of six Wildlife Acoustics SM4BAT full spectrum bat detectors that were powered by 12V, 7Amp-h sealed lead acid batteries replenished by photovoltaic solar panels. Two SanDisk memory cards, class 10 speed, with a capacity of 64 Gigabyte (GB) or 128 GB each, were utilised within each detector to ensure substantial memory space with high-quality recordings, even under conditions of multiple false environmental triggers.

Each detector was set to operate in continuous trigger mode from dusk each evening until dawn. Times were correlated with latitude and longitude and set to trigger half an hour before sunset and half an hour after sunrise. The trigger mode setting for the bat detectors, which record frequencies exceeding 16 kHz and -18 dB, was set to record for the duration of the sound and 1000 m/s after the sound ceased; this period is known as the trigger window.

The data from these recorders was downloaded over three to four-month intervals and analysed to provide an approximation of the bat frequency and species diversity that visit and inhabit the site during the periods of monitoring (refer to Volume II for summary of passive detectors deployed at the proposed Khoe WEF).

The positions of temporary bat monitoring masts were selected based on: the representation of different biotopes, proximity to possible bat conducive areas, and accessibility to install a mast and download data. Locations of the monitoring systems shown in Figure 4-3 and motivation for the locations of these are discussed in Volume II – Bat Specialist Report, Section 3.3.

FIGURE 4-3 LOCATION OF BAT MONITORING SYSTEMS



### Roost Surveys

Roost surveys were conducted when the bat specialist visited the site. While areas, where possible roosts could be situated, were investigated, all roosting areas are not accessible as bats sometimes roost in crevices or roofs with limited ceiling space. When day roosts are identified, bat counts are conducted at sunset and if deemed necessary, detectors are installed for short periods at point sources to monitor roosts. It should be noted that the site is large and roost searches are concentrated in areas where one would expect bats to roost. Within the 14-months and limitations of the bat monitoring study no day roosts were discovered.

### Point Sources

A SM4BAT full spectrum recorder was used during point sources, where the detector was placed for one night at a place where there is expected to be optimum bat activity.

### Data Analysis

Data were downloaded manually approximately once every three to four months. Acoustic files downloaded from the detectors were analysed for bat activity and possible bat species. Wildlife Acoustics Kaleidoscope 5.4.3 was used for analysing large quantities of data. In cases where there was uncertainty about the details of a call, but it was clear that it was a bat call, the call was classified as Unclear.

### Various Sources of Information

Various sources of information have been used to compile inform the Bat Assessment Report. Source of information is further discussed in Volume II, Section 3.3.4.

#### 4.2.9 SOCIO-ECONOMIC

The approach to the SIA study is based on the Western Cape Department of Environmental Affairs and Development Planning Guidelines for Social Impact Assessment (February 2007). These guidelines are based on international best practice. The key activities in the SIA process embodied in the guidelines include:

- Describing and obtaining an understanding of the proposed intervention (type, scale, and location), the settlements, and communities likely to be affected by the proposed project.
- Collecting baseline data on the current social and economic environment.
- Identifying the key potential social issues associated with the proposed project. This requires a site visit to the area and consultation with affected individuals and communities. As part of the process a basic information document was prepared and made available to key interested and affected parties. The aim of the document was to inform the affected parties of the nature and activities associated with the construction and operation of the proposed development to enable them to better understand and comment on the potential social issues and impacts.
- Assessing and documenting the significance of social impacts associated with the proposed intervention.
- Identifying alternatives and mitigation measures.

In this regard the study involved:

- Review of socio-economic data for the study area.
- Review of relevant planning and policy frameworks for the area.
- Review of information from similar studies, including the SIAs undertaken for other renewable energy projects.
- Site visit and interviews with key stakeholders.
- Identifying the key potential social issues associated with the proposed project.
- Assessing the significance of social impacts associated with the proposed project.

Identification of enhancement and mitigation measures aimed at maximizing opportunities and avoiding and or reducing negative impacts.

#### 4.2.10 HERITAGE, ARCHAEOLOGY

A desk-based review of available literature was carried out prior to the field survey to assess the general heritage context into which the development would be set. Maps and aerial photographs were sourced from Google Earth and Geo-spatial Information applications. Background data specific to the site were sourced from the South African Heritage Resources Information System (SAHRIS). Data was also collected via a field survey by two archaeologists subjected to a detailed foot survey between 8 and 11 April 2024.

#### 4.2.11 PALEONTOLOGY

A PIA was commissioned from Dr Marion Bamford of the University of the Witwatersrand as part of the HIA. The PIA has been included in Volume II.

The PIA comprised a desktop review of relevant paleontological and geological mapping for the area and the relevant sheet explanations.

Relevant literature, paleontological databases, and published and unpublished records were consulted to determine the likelihood of fossils occurring in the affected area. Sources included records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases.

The desktop study was used to determine the impact significance of the Khoe WEF on paleontological resources.

#### 4.2.12 VISUAL/LANDSCAPE

The study was undertaken using Geographical Information Systems (GIS) software as a tool to generate viewshed analyses and to apply relevant spatial criteria to the proposed facility. A detailed Digital Terrain Model (DTM) for the study area was created from topographical data provided by NASA in the form of a 30 m SRTM (Shuttle Radar Topography Mission) elevation model.

The following VIA-specific tasks have been undertaken:

##### **Determine potential visual exposure**

The visibility or visual exposure of any structure or activity is the point of departure for the visual impact assessment. It stands to reason that if (or where) the proposed facility and associated infrastructure were not visible, no impact would occur.

The viewshed analyses of the proposed facility and the related infrastructure are based on a 30 m SRTM digital terrain model of the study area.

The first step in determining the visual impact of the proposed facility is to identify the areas from which the structures would be visible. The type of structures, the dimensions, the extent of operations and their support infrastructure are taken into account.

##### **Determine visual distance/observer proximity to the facility**

In order to refine the visual exposure of the facility on surrounding areas/receptors, the principle of reduced impact over distance is applied in order to determine the core area of visual influence for this type of structure.

Proximity radii for the proposed infrastructure are created in order to indicate the scale and viewing distance of the facility and to determine the prominence of the structures in relation to their environment.

The visual distance theory and the observer's proximity to the facility are closely related, and especially relevant, when considered from areas with a high viewer incidence and a predominantly negative visual perception of the proposed facility.

##### **Determine viewer incidence/viewer perception (sensitive visual receptors)**

The next layer of information is the identification of areas of high viewer incidence (i.e. main roads, residential areas, settlements, etc.) that would be exposed to the project infrastructure.

This is done in order to focus the attention on areas where the perceived visual impact of the facility will be the highest and where the perception of affected observers will be negative.

Related to this dataset, is a land use character map, that further aids in identifying sensitive areas and possible critical features (i.e. tourist facilities, national parks, etc. – if applicable), that should be addressed.



**Determine the visual absorption capacity (VAC) of the landscape**

This is the capacity of the receiving environment to absorb the potential visual impact of the proposed facility. The VAC is primarily a function of the vegetation, and will be high if the vegetation is tall, dense and continuous. Conversely, low growing sparse and patchy vegetation will have a low VAC.

The VAC would also be high where the environment can readily absorb the structure in terms of texture, colour, form and light / shade characteristics of the structure. On the other hand, the VAC for a structure contrasting markedly with one or more of the characteristics of the environment would be low.

The VAC also generally increases with distance, where discernible detail in visual characteristics of both environment and structure decreases.

**Calculate the visual impact index**

The results of the above analyses are merged in order to determine the areas of likely visual impact and where the viewer perception would be negative. An area with short distance visual exposure to the proposed infrastructure, a high viewer incidence and a predominantly negative perception would therefore have a higher value (greater impact) on the index. This focusses the attention to the critical areas of potential impact and determines the potential magnitude of the visual impact.

GIS software will be used to perform all the analyses and to overlay relevant geographical data sets in order to generate a visual impact index.

**Determine impact significance**

The potential visual impacts are quantified in their respective geographical locations in order to determine the significance of the anticipated impact on identified receptors. Significance is determined as a function of extent, duration, magnitude (derived from the visual impact index) and probability. Potential cumulative and residual visual impacts are also addressed. The results of this section is displayed in impact tables and summarised in an impact statement.

**Propose mitigation measures**

The preferred alternative (or a possible permutation of the alternatives) will be based on its potential to reduce the visual impact. Additional general mitigation measures will be proposed in terms of the planning, construction, operation and decommissioning phases of the project.

**Reporting and map display**

All the data categories, used to calculate the visual impact index, and the results of the analyses will be displayed as maps in the accompanying report. The methodology of the analyses, the results of the visual impact assessment and the conclusion of the assessment will be addressed in this VIA report.

**Site visit and photo simulations**

A site visit was undertaken on the 6<sup>th</sup> September 2023 in order to verify the results of the spatial analyses and to identify any additional site-specific issues that may need to be addressed in the VIA report. It should be noted that, from a visual perspective, the different seasons do not influence the results of the impact assessment, and as such regardless of the timing of the site visit, the level of confidence for the assessment and findings is high.

Photographs from strategic viewpoints were taken in order to simulate realistic post construction views of the WEF. This aids in visualising the perceived visual impact of the proposed WEF and place it in spatial context.

#### 4.2.13 TRAFFIC AND TRANSPORTATION

- Evaluate the impacts of additional traffic generated by the proposed development on the existing road network in the immediate vicinity of the development;
- Determine the specific traffic needs during different phases of implementation, namely construction and installation, decommissioning and operation;
- Evaluate intersection capacity of the road network and recommend mitigation measures;
- Evaluate site access requirements (including site distance assessment if required);
- Confirm the associated clearances required for the necessary equipment to be transported from the point of delivery to the proposed site based on information on equipment provided by the Client;
- Confirm transport requirements during construction, operation and maintenance;
- Provide a high-level transport plan for the transportation of equipment to site; and
- Determine (Abnormal) Permit requirements, if any

### 4.3 IDENTIFICATION OF POTENTIAL IMPACTS

The identification of potential impacts covers the three phases of the proposed development: construction, operation and decommissioning. During each phase, the potential environmental impacts may be different. For example, during the construction phase, traffic volumes are far greater than during the operational life of a WEF.

The project team has experience from environmental studies for other projects in the locality of the proposed development. The team is, therefore, able to identify potential impacts addressed in the EIA based on their experience and knowledge of the type of development proposed and the local area. Their inputs inform the scope for the S&EIA process.

Each specialist assessment considered:

- The extent of the impact (local, regional or (inter) national);
- The intensity of the impact (low, medium or high);
- The duration of the impact and its reversibility;
- The probability of the impact occurring (improbable, possible, probable or definite);
- The confidence in the assessment; and
- Cumulative impacts.

Following identification of potential environmental impacts, the baseline information was used to predict changes to existing conditions and undertake an assessment of the impacts associated with these changes.

#### 4.3.1 ASSESSMENT OF POTENTIAL IMPACTS

The potential impact that the proposed development may have on each environmental receptor could be influenced by a combination of the sensitivity or importance of the receptor and the predicted degree of alteration from the baseline state (either beneficial or adverse).



Environmental sensitivity (or importance) may be categorised by a multitude of factors, such as the rarity of the species; transformation of natural landscapes or changes to soil quality and land use. The overall significance of a potential environmental impact is determined by the interaction of the above two factors (i.e. sensitivity/importance and predicted degree of alteration from the baseline).

A 7-step approach for the determination of significance of potential impacts was developed by ERM to align with the requirements of Appendix 3 of the EIA Regulations, 2014 (as amended). This 7-step approach was adapted from standard ranking metrics such as the Hacking Method, Crawford Method etc. and complies with the method provided in the EIA guideline document (GN 654 of 2010) and considers international EIA Regulatory reporting standards such as the newly amended European Environmental Impact Assessment (EIA) Directive (2014/52/EU).

Specialists, in their terms of references, were supplied with this standard method with which to determine the significance of impacts to ensure objective assessment and evaluation, while enabling easier multidisciplinary decision-making.

The approach is both objective and scientific based to allow appointed specialists and EAPs to retain independence throughout the assessment process.

The 7-Step approach for determining the significance of impacts pre, and post mitigation, is described below:

**Step 1:** Predict potential impacts by means of an appraisal of:

- Site Surveys;
- Project-related components and infrastructure;
- Activities related with the project life-cycle;
- The nature and profile of the receiving environment and potential sensitive environmental features and attributes;
- Input received during public participation from all stakeholders; and
- The relevant legal framework applicable to the proposed development

**Step 2:** Determination of whether the potential impacts identified in **Step 1** will be *direct* (caused by construction, operation, decommissioning or maintenance activities on the proposed development site or immediate surroundings of the site), *indirect* (not immediately observable or do not occur on the proposed development site or immediate surroundings of the site), *residual* (those impacts which remain after post mitigation) and *cumulative* (the combined impact of the project when considered in conjunction with similar projects in proximity).

**Step 3:** Description and determination of the significance of the predicted impacts in terms of the criteria below to ensure a consistent and systematic basis for the decision-making process. Significance is numerically quantified on the basis score of the following impact parameters:

**Extent** ® of the impact: The geographical extent of the impact on a given environmental receptor.

**Duration (D)** of the impact: The length of permanence of the impact on the environmental receptor.

**Reversibility** ® of the impact: The ability of the environmental receptor to rehabilitate or restore after the activity has caused environmental change

**Magnitude (M)** of the impact: The degree of alteration of the affected environmental receptor.

**Probability (P)** of the impact: The likelihood of the impact actually occurring.

A widely accepted numerical quantification of significance is the formula:

$$S=(E+D+R+M)*P$$

Where: *Significance*=(*Extent+Duration+Reversibility+Magnitude*)\**Probability*

The following has also been considered when determining the significance of a potential impact.

**Nature (N)** of the impact: A description of what causes the effect, what will be affected, and how it will be affected.

**Status (S)** of the impact: described as either positive, negative or neutral

#### Cumulative impacts.

Inclusion of **Public comment**.

The significance of environmental impacts is determined and ranked by considering the criteria presented in Table 4-2 below. All criteria are rank according to 'Very Low', 'Low', 'Moderate', 'High' and 'Very High' and are assigned scores of 1 to 5 respectively.

TABLE 4-2 DEFINING THE SIGNIFICANT IN TERMS OF THE IMPACT CRITERIA.

Impact Criteria	Definition	Score	Criteria Description
<b>Extent (E)</b>	Site	1	Impact is on the site only
	Local	2	Impact is localized inside the activity area
	Regional	3	Impact is localized outside the activity area
	National	4	Widespread impact beyond site boundary. May be defined in various ways, e.g. cadastral, catchment, topographic
	International	5	Impact widespread far beyond site boundary. Nationally or beyond
<b>Duration (D)</b>	Immediate	1	On impact only
	Short term	2	Quickly reversible, less than project life. Usually up to 5 years.
	Medium term	3	Reversible over time. Usually between 5 and 15 years.
	Long term	4	Longer than 10 years. Usually for the project life.
	Permanent	5	Indefinite
<b>Magnitude (M)</b>	Very Low	1	No impact on processes
	Low	2	Qualitative: Minor deterioration, nuisance or irritation, minor change in species/habitat/diversity or resource, no or very little quality deterioration.
	Moderate	3	Quantitative: No measurable change; Recommended level will never be exceeded.

Impact Criteria	Definition	Score	Criteria Description
	High	4	Qualitative: Moderate deterioration, discomfort, Partial loss of habitat /biodiversity /resource or slight or alteration.
	Very High	5	Quantitative: Measurable deterioration; Recommended level will occasionally be exceeded.
<b>Reversibility (R)</b>	Reversible	1	Qualitative: Substantial deterioration death, illness or injury, loss of habitat /diversity or resource, severe alteration, or disturbance of important processes.
	Recoverable	3	Quantitative: Measurable deterioration; Recommended level will often be exceeded (e.g. pollution)
	Irreversible	5	Permanent cessation of processes
<b>Probability (P)</b>	Improbable	1	Recovery which does not require rehabilitation and/or mitigation.
	Low Probability	2	Recovery which does require rehabilitation and/or mitigation.
	Probable	3	Not possible, despite action. The impact will still persist, and no mitigation will remedy or reverse the impact.
	Highly Probable	4	Not likely at all. No known risk or vulnerability to natural or induced hazards
	Definite	5	Unlikely; low likelihood; Seldom; low risk or vulnerability to natural or induced hazards

The significance (s) of potential impacts identified according to the criteria above has been colour coded for the purpose of comparison. This colour coding will be used in impact tables.

Significance is deemed Negative (-)			Significance is deemed Positive (+)		
0 – 30	31 – 60	61 – 100	0 – 30	31 – 60	61 – 100
Low	Moderate	High	Low	Moderate	High

**Step 4:** Determination of practical and reasonable mitigation measures based on specialists' inputs and field observations following the mitigation hierarchy (avoid, minimise, manage, mitigate, or rehabilitate).

**Step 5:** Evaluation of predicted residual impacts after implementation of mitigation measures.

**Step 6:** Determination of the significance of the impact taking into consideration the predicted residual impacts after implementation of mitigation measures.

**Step 7:** Based on an acceptable significance of the impact, determination of the need and desirability of the proposed development and an opinion as to whether the development should proceed or not.

The Assessment of the significance of potential impacts is then populated in an Impact Summary Table, see Section 10 and Section 11 of this Report for the specialists' impact assessments.

#### 4.3.2 MITIGATION

The EIA proposes measures to avoid, reduce or remedy significant adverse impacts which were identified; these are termed mitigation measures. Where the assessment process identified any significant adverse impacts, mitigation measures were proposed to reduce those impacts where practicable. Such measures include the physical design evolutions such as movement of turbines and management and operational measures. Design alterations such as relocating turbines to avoid certain sensitive receptors are mitigation embedded into the design of the proposed development, i.e., embedded mitigation.

This strategy of avoidance, reduction and remediation is a hierarchical one which seeks:

- First to avoid potential impacts;
- Then to reduce those which remain; and
- Lastly, where no other measures are possible, to propose compensatory measures.

Each specialist consultant identified appropriate mitigation and enhancement measures (where relevant).

#### 4.3.3 CUMULATIVE IMPACT ASSESSMENT

In accordance with the EIA Regulations, consideration is also given to 'cumulative impacts'.

Cumulative impacts are those that result from incremental changes caused by past, present or reasonably foreseeable future actions together with the proposed development. Cumulative impacts are the combined impacts of several developments that are different to the impacts from the developments on an individual basis. For example, the landscape impact of one WEF may be insignificant, but when combined with another it may become significant.

For this assessment cumulative impacts are defined and will be assessed in the future baseline scenario, i.e., cumulative impact of the proposed development = change caused by proposed development when added to the cumulative baseline. The cumulative baseline includes all other identified developments. In the cumulative assessment the effect of adding the proposed development to the cumulative baseline is assessed.

In line with best practice, the scope of this assessment has included all operational, approved or current and planned renewable energy applications (including those sites under appeal), within a 30 km radius of the site. Therefore, all potential projects are included, even though it is unknown how many of these will be constructed.

Renewable energy sites included for cumulative impact assessment are based on the knowledge and status of the surrounding areas at the time of the specialists compiling their assessments, these have been updated as applicable through the EIA process.

A preliminary assessment of cumulative impacts has been made in the Scoping Phase and has been assessed further in this EIA Phase (Section 11).



## 5. NEED AND DESIRABILITY

Reference is made to the DFFE 2017 Guideline on Need and Desirability which states that while the “concept of need and desirability relates to the type of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which need refers to time and desirability to place – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to wise use of land – i.e. the question of what is the most sustainable use of land.”

The Need and Desirability of the proposed development has been considered in terms of the regional location and the project’s cumulative impact. The guidelines pose questions that should be considered in this investigation, which are addressed in the Table 5-1 and Table 5-2 below.

**TABLE 5-1 ECOLOGICAL CONSIDERATIONS OF NEED AND DESIRABILITY FOR THE KHOE WEF**

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Question	Answer	Reference	
<i>How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?</i>	Through effective implementation of suggested mitigation and avoidance measures, it is unlikely that the development of the Khoe Wind Energy Facility would significantly compromise the long-term ecological integrity and associated ecosystem services of the site.	Volume II: Terrestrial Biodiversity Impact Assessment	
<i>How were the following ecological integrity considerations taken into account?</i>	<i>Threatened Ecosystems</i>	The proposed development area includes no threatened ecosystems as verified through the IUCN Red List of Ecosystems conservation tool.	Volume II: Terrestrial Biodiversity Impact Assessment
	<i>Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure</i>	An ecological sensitivity map of the site was produced by integrating information collected on-site with available ecological and biodiversity information. Sensitive features such as wetlands, drainage lines, water bodies, steep slopes and rocky outcrops were mapped and appropriately buffered. The proposed layout avoids all high-sensitive areas.	Volume II: Terrestrial Biodiversity Impact Assessment, Aquatic Impact Assessment, Bat Impact Assessment, Avifaunal Impact Assessment, Faunal Impact Assessment
	<i>Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs")</i>	The majority of the Very High Sensitivity area falls within Ecological Support Area (ESA) of Tier one (1), followed by Tier two (2) and finally small areas of CBA. The Western Cape Biodiversity Spatial Plan (WCBSP) Handbook defines ESAs as areas that are not essential for meeting biodiversity targets but play an important role in supporting the functioning of Protected Areas (PAs) and / or Critical Biodiversity Areas (CBAs), and are often vital for delivering ecosystem services. Ecological Support Areas (ESAs) support landscape connectivity, encompass the ecological infrastructure from which ecosystem goods and services flow, and strengthen resilience to climate change. The WCBSP Handbook furthermore distinguishes between ESAs 1, which are areas considered to be functional, in a natural or near-natural state or only	Volume II: Terrestrial Biodiversity Impact Assessment

<sup>39</sup>Section 24 of The Constitution of South Africa refers.

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	<p>moderately degraded, and ESAs 2 which are considered severely degraded or have no natural cover remaining and therefore require restoration. Ecological Support Areas (ESAs) include features such as regional climate adaptation corridors, water source and recharge areas, riparian habitat surrounding rivers or wetlands, and Endangered vegetation. The proposed PAOI falls within the Langeberg-West Catchment Area which is an important water recharge area which has triggered the Very High Sensitivity in the Terrestrial Biodiversity Theme as an ESA 1. In addition, several watercourses are marked for restoration from other land use.</p>	
<i>Conservation targets</i>	<p>The PAOI does not intersect with any NPAESs. There are no specific features of very high biodiversity value within the affected polygons and highly sensitive areas have been avoided for development. In addition, the site does not appear to fall on any significant gradients or corridors that are likely to be of high importance for biodiversity processes such as migration and faunal movement.</p>	Volume II: Terrestrial Biodiversity Impact Assessment
<i>Ecological drivers of the ecosystem</i>	<p>Transformation of intact habitat on a cumulative basis would contribute to the fragmentation of the landscape and would potentially disrupt the connectivity of the landscape for fauna and flora and impair their ability to respond to environmental fluctuations. Due to the presence of several other renewable energy developments (primarily solar developments which are more invasive in vegetation clearing) in the area, this is a potential cumulative impact of the development that is assessed.</p>	Volume II: Terrestrial Biodiversity Impact Assessment
<i>Environmental Management Framework</i>	<p>The proposed Khoe WEF complies with all policies and planning tools and has no intersections with EMFs or with any development zones according to the DFFE screening tool report.</p>	n/a
<i>Spatial Development Framework</i>	<p>The Langeberg Spatial Development Framework Vision is in support of Langeberg IDP vision: “To create a safe and healthy environment for delivering sustainable quality services” (IDP, 2022).</p> <p>The SDF notes that to attain this vision, the overall goal or mission is:</p> <ul style="list-style-type: none"> <li>To promote conservation and tourism in the Gouritz Cluster Biosphere, Rivieronderend Mountain Catchment Area, Langeberg West Mountain Catchment Area (including Dassieshoek, Montagu Mountain and Twisniet Nature Reserve), Matroosberg Management Catchment Area and Provincial Nature Reserves (Anysberg Nature Reserve and Vrolijkheid Nature Reserve) and Private Nature Reserves including Goedemoed, Skuilkrans and Mont Eco Nature Reserve.</li> </ul>	Volume II: Social Impact Assessment



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	<ul style="list-style-type: none"> <li>To enhance and intensify agriculture specifically in the Breede, Keisie and Koo Valleys.</li> <li>To strengthen sense of place of Langeberg settlements, rural areas, and scenic routes.</li> </ul> <p>A SWOT analysis was undertaken as part of the SDF process.</p>	
<i>Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.)</i>	<p>All global responsibilities to which South Africa is signatory or party to were assessed within this report. Applicable international treaties and conventions are:</p> <ul style="list-style-type: none"> <li>UNFCCC Paris Agreement (2016)</li> <li>The Equator Principles III (2020)</li> <li>The Convention on Biological Diversity (CBD) (1993)</li> <li>The Convention on the Conservation of Migratory Species of Wild Animals (CMS or Bonn Convention) (1983)</li> <li>The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) (1999)</li> </ul> <p>The proposed development complies with all international responsibilities.</p>	n/a
<i>How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i>	<p>The proposed development can disturb listed plant species and vegetation from clearing of the development footprint, soil erosion and alien plant invasion. Increased levels of pollution, noise, disturbance and human presence can impact negatively on faunal communities. Biodiversity value and ecological functioning of the proposed development area are potentially affected by the development.</p> <p>As part of the EIA process specialist studies were conducted to identify areas most environmentally suitable for development within the proposed development site boundary. As a result of these studies a development layout has been produced that avoids sensitive areas and identified constraints.</p> <p>The specialists have proposed mitigation measures to further reduce residual risks or enhance opportunities during construction, operation and decommissioning phases of the development. With implementation of these mitigation measures, all identified negative impacts are expected to be reduced to acceptable levels of medium or low negative significance. All mitigation measures proposed by the specialists are included in the EMPr for the project.</p>	<p>Volume I App B: EMPr Volume II: Specialist reports</p>

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<i>How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i>	On a national level the development will lessen the country's dependency on coal, and contribute to lowering water consumption, pollution and environmental degradation per kW of electricity produced. The EMPr provides measures for avoidance and minimisation of pollution, as well as enhancing any potential positive impacts.	Volume I App B: EMPr
<i>What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?</i>	The generation of waste will largely be restricted to the construction phase of the project and consist of normal construction phase solid waste streams. The EMPr will detail specific mitigation measures that must be implemented for the appropriate management and minimisation of waste, during all phases of the project.  Registered service providers will be utilised to transport solid waste to registered landfills.	Volume I App B: EMPr
<i>How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i>	A Heritage Impact Assessment and a Visual Impact Assessment were conducted to assess the proposed layout. Comment from the relevant heritage authority has been sought.  Mitigation measures have been identified by the heritage specialists to minimise and remedy residual impacts and enhance positive impacts.  Although the site has been classified as fatally flawed from a visual perspective, the turbines were placed in locations with optimal wind resource potential and if they are to be removed or relocated, the entire project would be jeopardized.	Volume II: Heritage Impact Assessment & Visual Impact Assessment
<i>How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including</i>	Wind is a renewable resource and will be the 'fuel' for the WEF to generate electricity. Therefore, the development will have a minimal impact on non-renewable resources.	n/a

<b>"securing ecological sustainable development and use of natural resources"<sup>39</sup></b>				
<i>offsetting) the impacts? What measures were explored to enhance positive impacts?</i>				
<i>How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What</i>		<p>The WEF will use the renewable energy resource of wind to generate power. Construction of the WEF will require use of water, a renewable natural resource.</p> <p>Operation of the WEF will consume relatively small quantities of water when compared to alternative energy technologies such as coal. Impacts on the ecosystem caused by use of these renewable energy resources has been evaluated.</p>	n/a	
	<i>Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)</i>		<p>The proposed WEF will reduce South Africa's dependency on non-renewable resources, particularly coal, as an energy source.</p> <p>Wind as an energy source is not dependent on water, as compared to the massive water requirements of conventional power stations, has a limited footprint and does not impact on large tracts of land, and poses limited pollution and health risks, specifically when compared to coal and nuclear energy plants.</p>	n/a
	<i>Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more</i>		<p>The current land use is low-intensity grazing and the land is not suitable for other agricultural uses.</p> <p>The proposed development will increase yield as the landowners will be paid for the use of their land. This will improve cash flow and financial sustainability of farming enterprises on site.</p>	Volume II: Agricultural Impact Assessment; Social Impact Assessment

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<p><i>measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?</i></p>	<p><i>important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources this the proposed development alternative?)</i></p>	<p>The proposed development itself will not cause a significant change in land use, as the development site is primarily low intensity agriculture (grazing), which can still proceed once the development is constructed. Wind is a renewable resource and a wind energy facility is the best use thereof.  Solar electricity generation would require a much greater infrastructure footprint to generate the equivalent energy of the proposed WEF.</p>	
	<p><i>Do the proposed location, type and scale of development promote a reduced dependency on resources?</i></p>	<p>The proposed WEF is predicted to reduce dependency on coal as an energy source.  Wind as an energy source is not dependent on water, as compared to the massive water requirements of conventional coal fired power stations, has a limited footprint and does not impact on large tracts of land, and poses limited pollution and health risks, specifically when compared to coal and nuclear energy plants.</p>	<p>n/a</p>
<p><i>How were a risk-averse and cautious approach applied in terms of ecological impacts?</i></p>	<p><i>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</i></p>	<p>For the current Flora assessment, sampling took place in the autumn season, and conditions were relatively dry during the site visit. Most of the vegetation across the site was relatively dry and in a dormant state. As a result, some plant species were not visible at the time and only the lists of the perennial species are considered reliable. While this poses some limitations for the study, the different habitats present could still be easily discerned based on the vegetation present and this is not likely to significantly affect the sensitivity mapping of the site or the characterisation of the plant communities present. To limit the gaps in the Flora assessment, the detailed site visits were done in conjunction with a desktop study.  Many fauna are difficult to observe in the field and their potential presence at a site must be evaluated based on the literature and available databases. However, many remote areas have not been well-sampled with the result that the species lists derived for such areas do not always adequately reflect the actual fauna present. In order to reduce this limitation, and ensure a conservative approach, the species lists derived for the site from the literature were obtained from an area significantly larger than the study site and are likely to include a much wider array of species than actually occur at the site.  In addition, the camera trapping that was conducted at the site provides a reliable baseline and an actual indication of the fauna present and their</p>	<p>Volume II: Fauna and Flora Impact Assessment</p>

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		levels of activity and distribution across the site. This is considered to be a cautious and conservative approach to the assessment and is considered significantly more reliable and robust than relying on available information alone, especially for such a poorly known area. Through camera trapping, Riverine Rabbit was also identified to be present on the site.	
	<i>What is the level of risk associated with the limits of current knowledge?</i>	The risk associated with assumptions and limits of current knowledge is the potential for information being assessed to be incorrect. This would translate to erroneous impact identification and mitigation measures. However, due to the amount of site work conducted the risk associated with this is considered to be low.	n/a
	<i>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</i>	To counter the likelihood that the area has not been well sampled in the past and in order to ensure a conservative approach, the species lists derived for the site from the literature were obtained from an area significantly larger than the study area and are likely to include a much wider array of species than actually occur at the site. This is a cautious and conservative approach which takes the study limitations into account. The precautionary approach has been adopted for this study, i.e. assuming the worst-case scenario will occur and then identifying ways to mitigate or manage these impacts.	Volume II: Terrestrial Biodiversity Impact Assessment
<i>How will the ecological impacts resulting from this development impact on people’s environmental right in terms following:</i>	<i>Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</i>	<p>Impacts on people’s rights have been identified and assessed by the social specialist, visual specialist and noise specialist.</p> <p>Although the site has been classified as fatally flawed from a visual perspective, the turbines were placed in locations with optimal wind resource potential and if they are to be removed or relocated, the entire project would be jeopardized.</p> <p>The significance of the potential negative health risks posed by the development (noise, shadow flicker, electromagnetic radiation) is expected to be moderate to low.</p> <p>The noise impact assessment found the level of noise impacts for the Khoe WEF are expected to be of low significance with mitigation.</p> <p>The operational impact on the sense of place is expected to be of low negative significance with or without mitigation.</p>	Volume II: Visual Impact Assessment; Social Impact Assessment; Noise Impact Assessment

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<i>Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?</i>	Renewable energy has fewer negative health effects than other forms of non-renewable energy generation and will have overall positive health benefits.	Volume II: Social Assessment      Impact
<i>Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?</i>	The SIA conducted for the proposed Khoe WEF indicates that during the construction and the operational phase of the proposed development project, various employment opportunities, with different levels of skills will be created. In addition, this will also create local business opportunities benefitting the socio-economic development of the local communities. The proposed development also represents an investment in clean, renewable energy infrastructure, which, given the negative environmental and socio-economic impacts associated with a coal-based energy economy and the challenges created by climate change, represents a significant positive social benefit for society as a whole.	Volume II: Social Assessment      Impact
<i>Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?</i>	The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance.	Volume II: Specialist Reports
<i>Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?</i>	Iterative specialists' constraints mapping identified the most suitable areas for development for which a development layout was then produced for assessment. The results of the specialist's studies further informed the development of the preferred layout.	Volume II: Specialist Reports
<i>Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?</i>	The cumulative impacts assessed for terrestrial biodiversity is the broad-scale change in ecological processes due to vegetation clearing impacts in the broader area. Within 30 km of the development, roughly five solar Photovoltaic developments are under consideration. Solar PV developments are more invasive in vegetation clearing and this impact can create habitat fragmentation in the broader area, as well as put species of conservation	Volume II: Terrestrial Biodiversity Impact Assessment

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	concern at risk. This potential impact will be minimized through active collaboration with the various developments in the area.	

**TABLE 5-2 SOCIO-ECONOMIC CONSIDERATIONS OF NEED AND DESIRABILITY FOR THE KHOE WEF**

<b>"Promoting justifiable economic and social development"<sup>40</sup></b>			
<b>Question</b>		<b>Answer</b>	<b>Reference</b>
What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area,	<p><b>Langeberg Municipality Integrated Development Plan</b></p> <p>The vision for the Langeberg Municipality (LM) as set out in the IDP is "to create a safe and healthy environment for delivering sustainable quality services". The mission statement that underpins the vision is "An efficient and cost-effective municipality for good governance, sustainable services, safe and secure environment, sound financial management and a conducive environment for local economic development".</p> <p>The IDP lists five strategic objectives (SOs), namely:</p> <ul style="list-style-type: none"> <li>• SO1: Ensure efficient administration for good governance.</li> <li>• SO2: Provide infrastructure for sustainable and affordable basic services.</li> <li>• SO3: Promote a safe and secure environment.</li> <li>• SO4: Promote and facilitate investment and local economic development.</li> <li>• SO5: Provide sustainable financial management.</li> </ul> <p><b>Western Cape Infrastructure Plan</b></p> <p>The Western Cape Infrastructure Framework (WCIF) (2013) was developed by the WCP Provincial Department of Transport and Public Works in terms of the Provincial Government's mandate to coordinate provincial planning under Schedule 5A of the Constitution. The objective of the WCIF is to align the planning, delivery and management of infrastructure to the strategic agenda</p>	Volume III; Social Impact Assessment

<sup>40</sup>Section 24 of The Constitution of South Africa refers.

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	<p>and vision for the province, as outlined in the 2009-2014 Draft Provincial Strategic Plan. The One Cape 2040 and 2013 Green is Smart strategy were other key informants.</p> <p>The document notes that given the status quo of infrastructure in the province, and the changing and uncertain world facing the Western Cape over the 2-3 decades a new approach to infrastructure is needed. Namely one that satisfies current needs and backlogs, maintains the existing infrastructure, and plans proactively for a desired future outcome. The 2040 vision requires a number of transitions to shift fundamentally the way in which infrastructure is provided and the type of infrastructure provided in WCP.</p> <p>The WCIF addresses new infrastructure development under five major 'systems' (themes), and outlines priorities for each. Energy is one of the 'systems' identified. The document notes that a provincial demand increase of 3% per year is anticipated for the period 2012-2040. Key priorities are in matching energy generation/ sourcing with the demand needed for WCP economic growth. Additionally, the energy focus should be on lowering the provincial carbon footprint, with an emphasis on renewable and locally generated energy.</p> <p>Three key transitions are identified for the WCP Energy 'system' infrastructure, namely:</p> <ul style="list-style-type: none"> <li>• Shifting transport patterns to reduce reliance on liquid fuels.</li> <li>• Promoting natural gas as a transition fuel by introducing gas processing and transport infrastructure.</li> <li>• Promoting the development of renewable energy plants in the province and associated manufacturing capacity.</li> </ul>	
<p><i>Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),</i></p>	<p>The current land use is primarily used for agriculture, with no other land use planned or occurring. No tourism or commercial hunting is associated with any of the site properties.</p> <p><b>Western Cape Green Economy Strategy Framework</b>                  The Western Cape Green Economy Strategy (2013) - 'Green is Smart' - is a framework for shifting the Western Cape economy from its current carbon intensive and resource-wasteful path within a context of high levels of poverty to one which is smarter, greener, more competitive, and more</p>	



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equitable and inclusive. The Strategy is closely aligned with provincial development goals and the 2014 WCCCRS.

The Strategy’s point of departure is that while the WCP faces significant challenges in terms of climate change and economic development. Two of the WCP’s key economic sectors - both of national importance - agriculture and tourism, are vulnerable to climate change. At the same time, these challenges hold significant potential for opportunities linked to attracting investment, economic development, employment creation, and more resilient infrastructure and patterns of consumption. These opportunities are partly linked to the WCP’s existing leadership in some fields of green technology, including knowledge services.

The core objective of the Strategy is to position the WCP as the lowest carbon footprint province in South Africa, and a leading green economy hub on the African continent.

The Strategy framework is made up of 5 drivers of the green economy which are market focused and principally private sector driven and supported by 5 enablers which are either public sector driven, or the product of a collaborative effort.

The five drivers are: smart mobility, smart living and working, smart ecosystems, smart agri-processing and smart enterprise. The relevant cross-cutting enablers are: finance, rules and regulations, knowledge management, capabilities, and infrastructure.

The framework also identifies priorities that would position the WCP as a pioneer and early adopter of green economic activity. These priorities have been identified in terms of the WCP being firstly, a front-runner or pioneer and secondly, an early adopter of innovations and technologies which already exist but are not widely adopted in South Africa. Some priorities are considered game-changers and are singled out as ‘high level priorities for green growth’.

Three such ‘high level priorities for green growth’ are identified, two of which are of relevance here:

- Natural Gas and Renewables: Off-shore natural gas, potential gas baseload power plants and renewable energy IPP programme, together

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with a greenfield gas infrastructure, will be the game-changer for the Western Cape to be the lowest carbon province in South Africa, and achieve significant manufacturing investment.

- Green Jobs: A green growth path without job growth is unsustainable. There must be early pursuit of priorities with a high rate of job growth potential – notably rehabilitation of natural assets, responsible tourism and the waste sector.

‘Under the section dealing with drivers, renewable energy is discussed under ‘Smart Enterprise’. The WCP’s objective in terms of this driver is to establish the WCP as a globally recognized centre of green living, working, creativity, business, and investment, and thereby attract investment, business and employment opportunities. Based on existing comparative advantages, three key opportunities are identified, one of which is of relevance here, namely, to establish the WCP as Africa’s new energy servicing hub.

In this regard, the Strategy document notes that WCP is well placed to be the most important research and servicing hub for the renewable and natural gas energy sectors in South Africa and on the African continent. The Strategy also notes that there are important initial opportunities in the construction of new energy infrastructure. However, the real long-term benefits lie in the servicing of operational infrastructure. In this regard, it is estimated that the annual servicing and maintenance costs of WEFs for instance amount to approximately 10% of the initial capital investment.

Public and market sector procurement are identified as some of the key enablers. The creation of a streamlined regulatory system – the reduction of ‘red tape’ – is identified as a key prerequisite for creating an enabling environment.

Under the section dealing with enablers necessary to unlock development potential, renewable energy is discussed under “Smart Infrastructure”. The Strategy document notes that existing infrastructure systems, particularly those relating to energy and transport, are carbon intensive, with high costs to the environment. Opportunities for the WCP are linked to tapping into infrastructural development funding by leveraging existing advantages.

With regard to the energy sector, the Strategy proposes that the WCP becomes an early adopter of natural gas processing and transport

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	<p>infrastructure and become the hub of Concentrated Solar manufacture and servicing. Natural gas is identified as the key potential 'game changer' of the WCP economy, and at present the best way to transition the economy to a more fully integrated renewables sector as major part of the WCP fuel mix in the long term. In this regard, the relative ease with which gas-fired stations could be activated make them an ideal supplement to less predictable wind and solar sources.</p> <p>Surprisingly, WEF and Solar PV manufacture and servicing receive no specific mention, while Concentrated Solar (CSP) does. The Strategy document justly notes that while the Northern Cape Province is the best suited for CSP facilities, the WCP has strong existing research capabilities in CSP at the University of Stellenbosch (US), and the WCP's existing manufacturing sector already has the capacity to manufacture many CSP components.</p> <p>Potential opportunities of commercialisation of CSP technology for local (RSA, Africa) conditions based on US research could be substantial. This subsector is identified as an important area of collaboration between the two provinces to realise the potential benefits. The key action at this stage to initiate a WCP manufacturing and servicing centre is to lobby for support for a pilot of South African designed CSP technologies, adapted to SA conditions.</p>							
<p><i>Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and</i></p>	<p>The study area economy and land use are based on agriculture. Primary agriculture is however on the decline and is being replaced by lifestyle- and weekend farming, conservation, and nature-based tourism. Current agricultural activities are largely based on raising livestock, but also includes limited cropping. Sheep, goats, and cattle are kept.</p>							
<p><i>Municipal Economic Development Strategy ("LED Strategy").</i></p>	<p>The IDP highlights the importance of prioritising infrastructure development as economic enabler for economic development. The importance to supporting SMMEs is also noted. The provision of energy infrastructure, such as the proposed renewable energy facility, supports this programme and will create opportunities to support SMMEs.</p>							
<p><i>Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?</i></p>	<p>Social impacts related to the construction phase:</p> <table border="1" data-bbox="667 1169 1449 1249"> <thead> <tr> <th data-bbox="667 1169 848 1249">Impact</th> <th data-bbox="848 1169 1149 1249">Significance No Mitigation/Enhancement</th> <th data-bbox="1149 1169 1449 1249">Significance With Mitigation/Enhancement</th> </tr> </thead> <tbody> <tr> <td data-bbox="667 1249 848 1272"></td> <td data-bbox="848 1249 1149 1272"></td> <td data-bbox="1149 1249 1449 1272"></td> </tr> </tbody> </table>	Impact	Significance No Mitigation/Enhancement	Significance With Mitigation/Enhancement				
Impact	Significance No Mitigation/Enhancement	Significance With Mitigation/Enhancement						

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<b>Creation of employment and business opportunities</b>	Medium (Positive)	Medium (Positive)
<b>Presence of construction workers and potential impacts on family structures and social networks</b>	Medium (Negative)	Low (Negative)
<b>Influx of job seekers</b>	Low (Negative)	Low (Negative)
<b>Safety risk, stock theft and damage to farm infrastructure associated with presence of construction workers</b>	Medium (Negative)	Low (Negative)
<b>Increased risk of grass fires</b>	Medium (Negative)	Low (Negative)
<b>Impact of heavy vehicles and construction activities</b>	Medium (Negative)	Low (Negative)
<b>Loss of farmland</b>	Medium (Negative)	Low (Negative)

Social impacts related to the operational phase:

<b>Impact</b>	<b>Significance No</b>	<b>Significance</b>
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	<b>Mitigation/Enhancement</b>	<b>With Mitigation/Enhancement</b>
<b>Establishment of infrastructure to improve energy security and support renewable sector</b>	Medium (Positive)	High (Positive)
<b>Creation of employment and business opportunities</b>	Low (Positive)	Medium (Positive)
<b>Generate income for local landowners</b>	Low (Positive)	High (Positive)
<b>Benefits associated with socio-economic contributions to community development</b>	Medium (Positive)	High (Positive)
<b>Visual impact on sense of place (VIA)</b>	Very High (Negative)	Very High (Negative)
<b>Visual impact and impact on sense of place (SIA)</b>	High (Negative)	High (Negative)
<b>Impact on property values of visually affected properties</b>	Medium (Negative)	Low (Negative)

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<b>Impact on tourism (affected properties)</b>	Medium (Negative)	Low (Negative)
<b>Impact on tourism: Region</b>	Low (Negative)	Low (Negative)

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 significant negative social cost.

Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?

The proposed development will contribute towards local economic development and skills development programs of the local and district municipality through the support and co-operation between public and private sectors, creation of employment and business opportunities, and the opportunity for skills development and on-site training during both construction and operation phases.

An important focus of the REIPPPP is to ensure that the build programme secures sustainable value for the country and enables local communities to benefit directly from the investments attracted into the area. In this regard Independent Power Producers (IPPs) are required to contribute a percentage of projected revenues accrued over the 20-year project operational life toward Socio-economic Development (SED) initiatives.

These contributions are linked to Community Trusts and accrue over the 20-year project operation life and are used to invest in housing and infrastructure as well as healthcare, education, and skills development. Community Trusts provide an opportunity to generate a steady revenue stream that is guaranteed for a 20-year period. This revenue can be used to fund development initiatives in the area and support the local community. The long-term duration of the revenue stream also allows local municipalities and communities to undertake long term planning for the area. The revenue

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		<p>from the proposed WEF can be used to support several social and economic initiatives in the area, including:                  Creation of jobs.                  Education.                  Support for and provision of basic services.                  School feeding schemes.                  Training and skills development.                  Support for SMME’s.</p>	
<p>How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?</p>		<p>The proposed development will contribute towards the local economic development strategies of the local and district municipality through the creation of employment and business opportunities, and the opportunity for skills development and on-site training during the construction, operation and decommissioning phase.</p> <p>The REIPPPP also contributes to Broad Based Black Economic Empowerment (BBBEE) and the creation of black industrialists. In this regard, Black South Africans own, on average, 34% of projects that have reached financial close (BW1-BW4), which is 4% higher than the 30% target. This includes black people in local communities that have ownership in the IPP projects that operate in or near their communities and represents the majority share of total South African Entity Participation.</p>	<p>Volume II: Social Impact Assessment</p>
<p>Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term? Will the impact be socially and economically sustainable in the short- and long-term?</p>		<p>Wind energy facilities are socially and economically sustainable in the short and long term. IPP projects require a minimum ownership of 2.5 % by local communities which represents a significant injection of capital into mainly rural areas of South Africa for the lifespan of the facility. In addition, local content minimum thresholds result in a substantial stimulus for establishing local manufacturing capacity.</p>	<p>Volume II: Social Impact Assessment</p>
<p><i>In terms of location, describe how the placement of the proposed development will:</i></p>	<p>result in the creation of residential and employment opportunities in close proximity to or integrated with each other,</p>	<p>The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities. Members from the local communities in the area, including De Doorns and Touws River, would be able to qualify for percentage of the low skilled and semi-skilled employment opportunities. Most of these employment opportunities will accrue to Historically Disadvantaged (HD) members of the community.</p> <p>The typical lifespan of WEFs is 20 to 25 years. During the operational phase there will be a significant decrease in employment opportunities. The</p>	<p>Volume II: Social Impact Assessment;</p>

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	<p>operational phase of the proposed project will create in the region of 20 full time employment opportunities during the operational phase.                  Typical employees that might be required include: Technicians, electricians, engineers, IT specialists, environmental specialists, health and safety managers, and administrators (skilled); drivers and equipment operators (semi-skilled); construction workers and security staff (low-skilled).</p> <p>The recruitment process and the requirements for each skill level and each employment opportunity need to be clearly communicated to local communities to ensure that no unrealistic expectations are created.</p>	
reduce the need for transport of people and goods,	The need for transport of people and goods will be increased during the construction phase. Lower per capita carbon footprints are predicted due to the commercial forms of transport that will be employed to move the workforce (e.g. public transport, contractor buses).	Volume II: Traffic Impact Assessment;
result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	Not applicable.	n/a
compliment other uses in the area,	Local communities and their service providers will benefit from the socio-economic development provided by the WEF and current land use will be able to continue.	Volume II Social Impact Assessment;
be in line with the planning for the area,	The proposed WEF is in line with applicable international, national, provincial and local planning strategies.	Volume II Social Impact Assessment
for urban related development, make use of underutilised land	The proposed development occurs away from the urban edge.	n/a



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available with the urban edge,		
<i>optimise the use of existing resources and infrastructure,</i>	<p>Wind energy is a renewable, clean resource and reduces pollution and the reliance on non-renewable fossil fuels and water for electricity generation. Existing access roads will be utilised wherever possible. It is expected that any construction water required will be delivered by tankers.</p> <p>Waste removal will be in accordance with best practice by qualified waste removal contractors to the nearest registered landfill.</p> <p>Portable sanitation facilities will be utilised during construction, so that no connection to the local sewerage system will be required.</p> <p>Any additional infrastructure required will be constructed by the developer.</p>	n/a
<i>opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),</i>	<p>No opportunity costs in terms of bulk infrastructure expansions in non-priority areas are predicted due to the proposed development.</p> <p>The proposed WEF is not located within a bulk infrastructure expansion area.</p>	n/a
<i>discourage "urban sprawl" and contribute to compaction/densification,</i>	Not applicable as the proposed development site lies outside of urban areas.	n/a
<i>contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,</i>	The project will contribute to economic and infrastructure development in the Western Cape Province, in line with the Langeberg Integrated Development Plan.	n/a

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<p>encourage environmentally sustainable land development practices and processes,</p>	<p>Construction of the renewable energy Khoe WEF project will assist South Africa in transitioning from a carbon-intensive resource use economy to a sustainable low carbon footprint economy. Sustainable land development is an overarching aspect of the proposed project development.</p>	<p>n/a</p>
<p><i>take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),</i></p>	<ul style="list-style-type: none"> <li>• Feasibility of access for wind turbine delivery, the site is easily accessible from the national road;</li> <li>• Close proximity to the Eskom grid with available evacuation capacity;</li> <li>• Viable wind resource, therefore suited to wind farm development;</li> <li>• The proposed site is agricultural land and current land use is low intensity grazing; and</li> <li>• Willingness of landowners to host a wind farm on their properties.</li> </ul>	<p>Section 7.2: Site Alternatives</p>
<p><i>the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),</i></p>	<p>The proposed development will create jobs and contribute towards socio-economic development in an area that does not have high economic potential.</p> <p>The WEF is likely to result in significant positive socio-economic opportunities.</p>	<p>Vol II: Social Impact Assessment</p>
<p><i>impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and</i></p>	<p>While the proposed WEF has a generally 'high' visual impact significance, the turbines are located in locations with the highest resource wind potential. Impacts to the cultural landscape are unavoidable but only of a medium significance and no other aspects of heritage are expected to be impacted significantly.</p>	<p>Vol II: Social Impact Assessment; Visual Impact Assessment; Heritage Impact Assessment</p>
<p><i>in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?</i></p>	<p>The proposed development aligns with the Langeberg Municipality Integrated Development Plan. The proposed development is predicted to support the creation of a more integrated settlement.</p>	<p>Vol II: Social Impact Assessment</p>

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<p>How were a risk-averse and cautious approach applied in terms of socio-economic impacts?:</p>	<p>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p>	<p>One limitation that could be identified is that some of the provincial documents do not contain data from the 2022 Census. The data from the 2011 and 2016 Household Community Survey is therefore referred to.</p>	<p>Vol II: Social Impact Assessment</p>
	<p>What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</p>	<p>The risk due to limits of current knowledge is considered to be low due to the positive socioeconomic impact expected from the proposed WEF.</p>	<p>Vol II: Social Impact Assessment</p>
	<p>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	<p>A risk-averse and cautious approach was utilised throughout the impact assessment process by all specialists. The precautionary approach has been adopted for this study, i.e. assuming the worst-case scenario will occur and then identifying ways to mitigate or manage these impacts. Mitigation measures to manage these impacts have been provided.</p>	<p>Vol II: Social Impact Assessment</p>
<p>How will the socio-economic impacts resulting from this development impact on people’s environmental right in terms following:</p>	<p>Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p>	<p>Negative impacts were identified by the Social Specialist. These are:</p> <ul style="list-style-type: none"> <li>• The presence of construction workers on-site and in the area on the local communities.</li> <li>• Potential influx of job seekers.</li> <li>• The potential loss of farmlands for grazing of sheep and on associated farming activities.</li> <li>• Potential safety risk for farmers, risk of livestock theft and theft of farming infrastructure.</li> <li>• The increased risk of potential grass fires associated with the construction phase.</li> </ul> <p>The potential impacts of heavy vehicles and construction related activities, damage to roads, and dust pollution.</p> <p>The potential loss of farmland.</p> <ul style="list-style-type: none"> <li>• Visual impact and associated impact on the sense of place.</li> <li>• The potential impact on tourism.</li> </ul>	<p>Vol II: Social Impact Assessment App B: EMPr EIAr Section 10</p>

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		<p>The potential loss of employment opportunities and associated income (decommissioning impact).                  The establishment of several renewable energy facilities (WEFs and SEFs), may potentially place pressure on property, local services, e.g. education, medical, accommodation, water supply, waste management etc. (cumulative impact).                  Measures to minimise, manage and remedy negative impacts are provided in Volume II: Social Impact Assessment and Section 9 of this Report.</p>	
	<p><i>Positive impacts. What measures were taken to enhance positive impacts?</i></p>	<p>Positive impacts were identified by the Social Specialist. These are:</p> <ul style="list-style-type: none"> <li>• Establishment of renewable energy infrastructure and the generation of clean, renewable energy;</li> <li>• The creation of local employment and business opportunities, and opportunities for skills development and on-site training;</li> <li>• Benefits associated with the local economic development initiatives; and</li> <li>• Benefits for landowners.</li> </ul> <p>Details of enhancement measures are provided in the Social Impact Assessment, Section 10 of this EIAr, and are included in the EMPr.</p>	<p>Vol II: Social Impact Assessment                  EIAr Section 10</p>
	<p><i>Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development’s socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</i></p>	<p>It is not expected that the development’s socio-economic impacts will result in significant ecological impacts. Although the development would result in some habitat loss across the site, this is not likely to affect the fauna and flora. Mitigation measures must be implemented to avoid the direct threat to the fauna. These specific mitigation measures should be implemented during construction and operation to reduce this risk. There are no impacts associated with the development of the Khoe WEF on terrestrial biodiversity that cannot be mitigated to an acceptable level. As such, should all the proposed mitigation be implemented, the Khoe WEF development is deemed acceptable from a terrestrial ecological impact perspective. In terms of cumulative impacts, the affected area has not been significantly impacted by renewable energy development to date and the contribution of the current wind farm development to cumulative impact is considered low and acceptable. It is thus the reasoned opinion of the specialist that the Khoe WEF development should be authorised subject to the various mitigation and avoidance measures as indicated.</p>	<p>Vol II: Terrestrial Biodiversity Assessment</p>
	<p><i>What measures were taken to pursue the selection of the “best practicable environmental option” in terms of socio-economic considerations?</i></p>	<p>Iterative specialists’ constraints mapping identified the most suitable areas for development for which a development layout was then produced for assessment. The results of the specialist’s studies, including interviews by</p>	<p>Volume II: Specialist</p>

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		the Social Specialist, and Scoping phase PPP, further informed the development of the updated site layout.	Assessment Reports
<i>What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</i>	<i>Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?</i>	<p>The proposed development aligns with a variety of planning policies that consider environmental and spatial justice.</p> <p>Alternatives were 'scoped' out in the scoping phase and the most feasible environmentally and socially preferred location was chosen for approval in the EIA phase.</p> <p>Public consultation considers all person(s) and the application process will continue to consider all persons, and disadvantaged people who may be impacted by the development.</p>	n/a
<i>What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</i>		The proposed development will contribute to equitable access by supplying electricity to the national grid, and by providing local and regional socioeconomic benefits in terms of the REIPPPP Economic Development requirements, which includes a BBBEE scorecard on which wind projects are evaluated.	n/a
<i>What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?</i>		Construction, operation and decommissioning of the proposed development will be done according to environmental health and safety legislative requirements and applicable guidelines.	n/a
<i>What measures were taken to:</i>	<i>ensure the participation of all interested and affected parties,</i>	Public participation is being undertaken according to NEMA: EIA Regulations (2014) as amended and DFFE (2017) Public Participation Guidelines.	Section 9; Volume III

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<p><i>provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation,</i></p>	<p>The PPP is being undertaken in terms of legislative requirements and best practice guidelines. All notifications are provided in English and Afrikaans. Further languages are made available upon request.</p>	<p>Section 9; Volume III</p>
<p><i>ensure participation by vulnerable and disadvantaged persons,</i></p>	<p>The PPP is being undertaken according to best practice guidelines and regulatory requirements; Notification of initiation of the PPP was provided in all required channels, i.e. newspaper adverts, site notices, local posters and written notifications.</p>	<p>Section 9; Volume III</p>
<p><i>promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,</i></p>	<p>The proposed development fits into the various planning policies and the implementation of a Community Trust will assist the local strategies, including improving education facilities and youth development</p>	<p>Vol II: Social Impact Assessment</p>
<p><i>ensure openness and transparency, and access to information in terms of the process,</i></p>	<p>Legislative requirements and best practice guidelines are followed throughout the process.  The PPP is being undertaken in terms of legislative requirements and best practice guidelines.</p>	<p>Section 9; Volume III</p>
<p><i>ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, and</i></p>	<p>A PPP is being undertaken in terms of legislative requirements and best practice guidelines.  A Social Impact Assessment forms part of the Scoping &amp; EIA process. The independent Social Specialist ensures that all needs and values are considered.</p>	<p>Section 9; Volume III: Social Impact Assessment</p>

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	<i>ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?</i>	<p>The Social Impact Assessment and PPP that are conducted according to legislation and guidelines ensure that women and youth are recognised and involved in the process.</p> <p>REIPPPP requirements place specific responsibilities on IPPs in terms of women and youth development.</p>	Section 9; Volume III: Social Impact Assessment
	<i>Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?</i>	<p>The proposed WEF has a good planning fit with all applicable policies and will result in substantial local socio-economic opportunities.</p> <p>The key challenges facing the region are poverty and inequality and a shortage of skills. As such the proposed development will be of benefit to the local area by creating job and business opportunities, particularly for unskilled and semi-skilled local workers.</p>	Volume II: Social Impact Assessment
	<i>What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?</i>	Future workers on the proposed development will be educated on their rights to refuse work.	n/a
Describe how the development will impact on job creation in terms of, amongst other aspects:	the number of temporary versus permanent jobs that will be created,	An estimated 200-250 temporary employment opportunities will be created for 18 - 24 months during the construction phase. Approximately 20 full time employment opportunities will be created for the operational phase of the proposed development.	Volume II: Social Impact Assessment
	whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the	Members from the local communities in De Doorns and Touws River would qualify for a percentage of low skilled and semi-skilled employment opportunities and several skilled opportunities. Most of these employment opportunities will accrue to Historically Disadvantaged (HD) members from the local community. Given relatively high local unemployment levels and	Volume II: Social Impact Assessment

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	skills available in the area),	limited job opportunities in the area, this will represent a significant, if localised, social benefit.	
	the distance from where labourers will have to travel,	It is expected that most workers will reside in the nearby towns Worcester, De Doorns and Touws River	Volume II: Social Impact Assessment
	the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and	<p>Members from the local communities in De Doorns and Touws River would qualify for some of the low skilled and semi-skilled employment opportunities and several skilled opportunities. The Most of these employment opportunities will accrue to Historically Disadvantaged (HD) members from the local community. Given relatively high local unemployment levels and limited job opportunities in the area, this will represent a social benefit.</p> <p>It will also be possible to increase the number of local employment opportunities through the implementation of a skills development and training programme linked to the operational phase.</p> <p>A percentage of the monthly wage bill earned by permanent staff would be spent in the regional and local economy. This will benefit local businesses in the relevant towns. The benefits to the local economy will extend over the anticipated 20-year operational lifespan of the project.</p> <p>The local hospitality industry is also likely to benefit from the operational phase. These benefits are associated with site visits by company staff members and other professionals (engineers, technicians etc.) who are involved in the company and the project but who are not linked to the day-to-day operations.</p> <p>Procurement during the operational phase will also create opportunities for the local economy and businesses.</p>	Volume II: Social Impact Assessment
	the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).	The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities that will benefit members from the local communities in the area, including De Doorns and Touws River. Majority of households depend of the agriculture sector, therefore this proposed employment will create employment opportunities.	Volume II: Social Impact Assessment
What measures were taken to ensure:	that there were intergovernmental coordination and	All applicable planning policies and legislation were considered. The proposed development fits with all planning policies.	Volume I: EIA Report



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	<p>harmonisation of policies, legislation and actions relating to the environment, and</p>	<p>Organs of State were pre-identified and registered on the I&amp;AP database and these were updated, if required, as the development phases have progressed.</p>	<p>Volume III: PP Report</p>
	<p>that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?</p>	<p>As registered I&amp;APs all public correspondence including notifications of reports availability are provided.</p>	<p>Volume III: PP Report</p>
<p>What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people’s common heritage?</p>		<p>The proposed development aims to uphold the principles of sustainable development.  The project team consists of suitably qualified individuals that comply with all legal requirements.</p>	<p>Volume I: EIA Report Volume II: Specialist Reports</p>
<p>Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?</p>		<p>Specialist mitigation measures were identified during the EIA process and provided in the EIAR and EMPr. These measures are realistic and should they change, the EMPr must be submitted to the Department and made available for public to review and comment.</p>	<p>Volume I: Appendix B: EMPr</p>
<p>What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?</p>		<p>An EMPr is submitted with EIAR. The EMPr is a legally binding document, which when enforced during construction, operational or decommissioning phases, hold the applicant or their representative liable for any remedial actions as a result of negligence.</p>	<p>Volume I: Appendix B: EMPr</p>

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Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?

The alternative selection process includes the assessment of the No Development alternative, site alternatives, design layout alternatives and technology alternatives.

Section 7

Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?

**Cumulative impact on sense of place**  
 The proposed Khoe WEF is also one half of a larger wind energy cluster consisting of another proposed WEF to the south, namely the Khoe WEF. The cumulative visual impact of the proposed Khoe WEF, together with the proposed Hugo WEF is expected to be Very High, depending on the observer’s sensitivity to wind turbine structures. The VIA notes that owing to the sensitivity of the landscape, the high visual quality and the potential visual impacts on sensitive visual receptors, the cumulative visual impact is not considered to be within acceptable limits.

**Cumulative impact on local services and accommodation**  
 The establishment of a number of renewable energy facilities and associated projects, such as the proposed WEF, in the Breede Valley Municipality and Langeberg Municipality has the potential to place pressure on local services, specifically medical, education and accommodation.

**Cumulative impact on local economy**  
 The establishment of renewable energy facilities and associated projects, such as the WEF, in the LM will create employment, skills development and training opportunities, creation of downstream business opportunities.

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## 5.1 THE NEED AND DESIRABILITY OF RENEWABLE ENERGY FACILITIES

WEFs can play a role in mitigating or reducing climate change, addressing South Africa's energy resource constraints and producing low-cost energy. In addition, operating WEFs in South Africa contribute significantly to the economic development of the areas in which they are located through the requirements of the REIPPPP adjudication process. This section of the report highlights the national, provincial and local plans and policies that are in support of renewable energy facilities. Throughout this section, it is demonstrated that at all levels of governance, policy supports the development of renewable energy to address energy supply issues, and to promote economic growth in South Africa.

### 5.1.1 MITIGATING CLIMATE CHANGE

The scientific consensus is that climate is changing and that these changes are in large part caused by human activities. Of these human activities, increase in carbon dioxide (CO<sub>2</sub>) levels due to emissions from fossil fuel combustion is regarded as a significant contributor to anthropogenic climate change.

As explained in National Treasury's Carbon Tax Policy Paper (May 2013), addressing the challenges of climate change through facilitating a viable and fair transition to a low-carbon economy is essential to ensure an environmentally sustainable economic development and growth path for South Africa. Further the Policy Paper states that the South African government is of the view that South Africa needs to reduce its greenhouse gas emissions while working to ensure economic growth, increase employment, and reduce poverty and inequality.

Renewable energy projects will play a significant role in meeting the targets of the Paris Agreement and assisting the transition to a low-carbon economy.

### 5.1.2 DIVERSIFICATION AND DECENTRALISATION OF SUPPLY

With its abundant coal supplies, approximately 89% of South Africa's energy needs are currently met through coal-fired generators, with nuclear energy contributing approximately 5% and the balance by pumped storage and hydroelectric (3.6%), renewable energy (2.4%) and gas turbines (0.1%). Electricity generation is dominated by state-owned power company Eskom, which currently produces over 96.7% of the power used in the country.

A diversification of energy supplies and producers, particularly with respect to renewable energy sources, would lead to greater energy security and economic and environmental benefits.

The deployment of various renewable technologies increases the diversity of electricity sources and, through local decentralised generation, contributes to the flexibility of the system and its resistance to central shocks.

According to the International Energy Agency, "renewable energy resources ... exist virtually everywhere, in contrast to other energy sources, which are concentrated in a limited number of countries. Reduced energy intensity, as well as geographical and technological diversification of energy sources, would result in far-reaching energy security and economic benefits."

The renewables programme has resulted in over 6,000 MW of generation capacity being allocated to bidders across a variety of technologies, principally in wind and solar in South

Africa. Progress in this regard has been made under the DoE REIPPPP. According to the DoE's Integrated Resource Plan for Electricity 2010-2030, South Africa is aiming to procure 9200 MW of wind power by 2030.

### 5.1.3 ECONOMIC DEVELOPMENT AND JOB CREATION

The REIPPPP requires Economic Development ("ED") commitments from onshore wind energy projects and projects are adjudicated according to their ED commitments. The main ED beneficiaries of approved projects are currently communities living within a 50 km radius of renewable energy facilities. Projects are bid and thereafter adjudicated according to tariff (70%) and Economic Development (30%). There is therefore an incentive for projects to focus on Economic Development of the Local Community and to assign as much revenue, jobs, procurement etc. to local people as well as South African companies and people as possible to stand a chance of having a successful project.

TABLE 5-3 REIPPP POINTS WEIGHTING

Economic Development Elements	Weighting
Job Creation	25%
Local Content	25%
Ownership	15%
Management Control	5%
Preferential Procurement	10%
Enterprise Development	5%
Socio-Economic Development	15%
Total	100%
Total points	30 points

A number of these elements will have a significant and positive impact on the Local Community.

In terms of job creation, bidders are required to indicate the actual number of jobs that will be created for South African citizens, Skilled People, Black People, Skilled Black People and Citizens from the Local Communities. Significant skilled and unskilled job opportunities will be created in the Local Communities, particularly during the construction period.

For Ownership, bidders are required to indicate the total shareholding of the Project Company in the hands of Black People and Local Communities. The minimum ownership percentage for Local Community is 2.5% but projects have committed up to 40% Local Community Ownership in order to have a competitive project. Broad-based community trusts are established as a vehicle for Local Community Ownership to received dividend revenue from an operating project that will be invested in socio-economic development imperatives as determined by trustees. The ownership stake is funded either through debt or through equity partners ("a free-carry").

The Socio-Economic Development and Enterprise Development commitments require a percentage of gross revenue from the operating wind farm to be invested in education, health, small business development etc. Projects are required to commit at least 1% of gross revenue towards socio-economic development. As an indication, 1% of gross revenue of a hypothetical 140 MW wind farm, with a capacity factor of 35% and a tariff of 80 c/kWh would equal

approximately R3.5 m/year (and R68 million over the 20-year operation period of a project). Projects in the REIPPPP receive additional points if the socio-economic and enterprise development investments are committed to be invested in the Local Community.

WEFs in South Africa will create skilled and unskilled jobs, particularly during the construction period. Under the REIPPPP, projects are incentivised to maximise the direct job creation opportunities, particularly for people in the communities surrounding the project.

WEFs tend to be constructed in rural areas with small communities and limited infrastructure and social amenities. A wind farm would create indirect jobs in accommodation, catering and other services that would support a wind farm and cater for the material and social needs of wind farm workers.

Localisation is considered one of the major contributors to job creation and general improvement of the economy of South Africa. Localisation through the construction of new manufacturing facilities to build wind turbine towers and other turbine components in South Africa is currently progressing.

Wind energy can provide technical skills to South Africans and thus improve the technical skills profile of the country and the regions where wind energy facilities are located. Through the REIPPPP, developers' own initiatives and through support from international donor agencies, a number of young South Africans are being trained on various aspects of wind farm construction and operation.

These projects, if successfully implemented, have the potential to transform for the better key development areas of South Africa and would assist South Africa in meeting its development goals, while meeting its carbon emission reduction targets as per international protocols

## 5.2 POLICIES IN SUPPORT OF RENEWABLE ENERGY

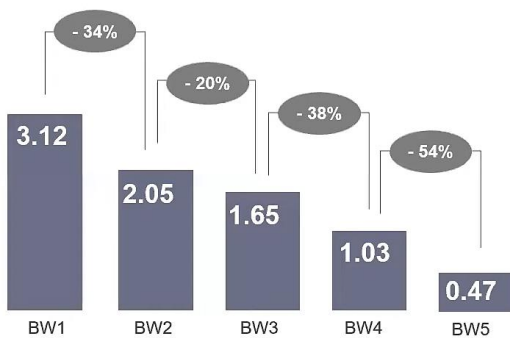
Renewable energy is supported in terms of meeting the country's climate change goals, and in terms of reducing the country's dependence on fossil fuels as the main source of meeting the country's electricity requirements. The National Climate Change Adaptation Strategy (NCCAS) for The Republic of South Africa Version UE10, 13 November 2019, explains that the South African primary sectors, such as agriculture and mining, which are natural resource dependent are high consumption uses of energy. The NCCAS is adopting a cluster approach to assist with the changing climate conditions and the affect it has on various sectors. An action in support of this development is the approach to "create a more adaptive energy system to reduce dependence on a centralised system and increase distributed generation, especially in rural areas". "This will involve encouraging the development of an adaptive and decentralised energy system so that the system is more resilient to climate disruptions".

Both national and provincial policies and planning documents support the development of renewable energy facilities. The development of and investment in renewable energy is supported by the National Development Plan (NDP), New Growth Path Framework, Integrated Resource Plan (IRP) and National Infrastructure Plan. At a provincial level, the development of renewable energy is supported by the Northern Cape Provincial Development and Resource Management Plan / Provincial Spatial Development Framework (PSDF) of 2020, Pixley Ka Seme District Municipality Integrated Development Plan (IDP) for 2022-2027, and Spatial Development Framework; and the Ubuntu Local Municipality Integrated Development Plan for 2022 - 2023.

The need and desirability for renewable energy developments play a role in South Africa meeting its energy and climate change targets and provides a socio-economic boost at the local level in areas that are in need of it.

Aside from environmental considerations, investment in renewables have been driven by dramatic reductions in their costs. Figure 5-1 shows this trend and that in the six years between bid windows 4 and 5, the average price of electricity purchased through the REIPPPP fell by 54% (Magoro, 2021).

FIGURE 5-1 REIPPPP AVERAGE BID PRICES IN APRIL 2021 TERMS (MAGARO, 2021)



### 5.3 NEED AND DESIRABILITY GUIDE

Reference is made to the DFFE 2017 Guideline on Need and Desirability which states that while the “concept of need and desirability relates to the type of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which need refers to time and desirability to place – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to wise use of land – i.e. the question of what the most sustainable use of land is.”

The guidelines pose questions that should be considered in this investigation, which will be addressed in EIA Phase.

## 6. DESCRIPTION OF THE BASELINE ENVIRONMENT

To evaluate the potential E&S impacts, information relating to the existing environmental conditions or baseline environment is collected through field and desktop research. The baseline environment also extends into the future, although predictions of any changes can involve a high number of variables and may be subject to potentially large uncertainties. As a result, in most cases, the baseline is assumed to remain unchanged throughout the operation of the development. Where this is not the case, this is stated.

The baseline environment has been used to identify any potential sensitive receptors on and near the site, and it is used to assess what changes may take place during the construction, operation and decommissioning phases of the development and the effects, if any, that these changes may have on these receptors.

Within each technical assessment, the methods of data collection are discussed with the relevant specialists. Data is also collected from public records and other archive sources and where appropriate, extensive field surveys are carried out. The timing/seasonality of the work within the study area is also outlined within each assessment where applicable.

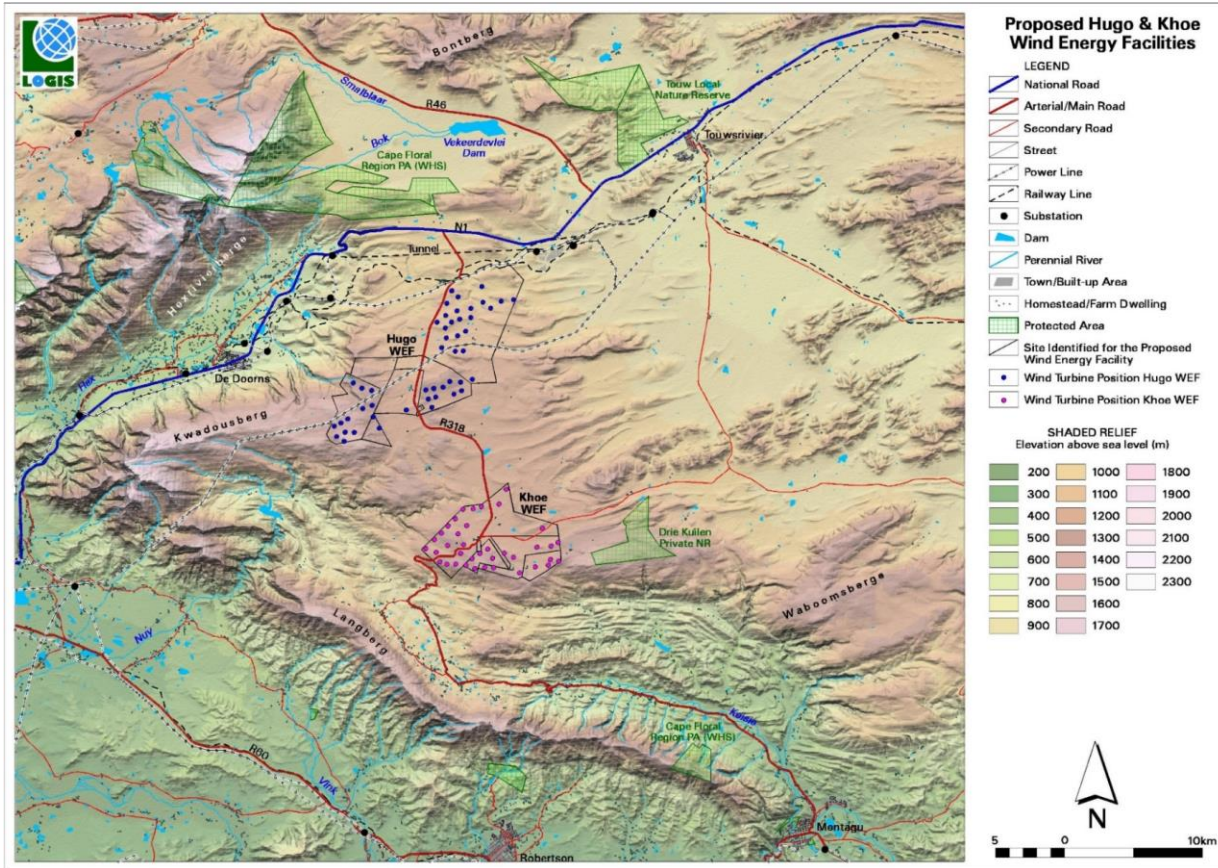
### 6.1 BIOPHYSICAL CHARACTERISTICS OF THE STUDY AREA

#### 6.1.1 TOPOGRAPHY AND TERRAIN

The study area occurs on land that ranges in elevation from approximately 200 meters above sea level (m asl) in the south west at the base of the Langeberg Mountain along drainage lines and in the west along the Hex River to 1,800m asl on the tops of mountain ranges such as Kwadousberg and Langeberg. The site itself is located on land with an average elevation of 1,500m asl. Numerous mountain ranges are located within the study area, namely the Hexrivierberge and Kwadousberg in the west, Langeberg to the south, Waboomsberge to the south east and Bontberg to the north. Prominent water sources within the study area include the Nuy, Vink, Keisie, Hex Rivers. The Smalblaar and Bok rivers flow into the Verkeerdevlei Dam in the north. See Figure 6-1 for the shaded relief/topography map of the study area.



FIGURE 6-1 SHADED RELIEF MAP OF THE STUDY AREA





The proposed Khoe WEF and associated infrastructure is located approximately 29 km south west of the town of Touws River, 20 km south east from De Doorns and 35 km west of Worcester within the Langeberg Local Municipality within the Western Cape Province. The site straddles the R 318, which is a designated tourist route in terms of the Langeberg SDF (2023). The R318 links Montagu to the south to the N1 to the north. The proposed Khoe WEF is located ~ 8-10 km south of the Hugo WEF, and also straddles the R318. An initial review of available information indicates that there are several provincial and private nature reserves and tourist facilities located in the area. The attraction to the area is linked to the natural landscape and rural character, including the areas vistas and views. The proposed Khoe WEF is therefore located in an area that is visually sensitive. Figure 6-2 illustrates the location of private and provincial nature reserves in the Langeberg Municipality and in vicinity to the proposed Khoe WEF site.

**FIGURE 6-2 LOCATION OF PRIVATE AND PROVINCIAL NATURE RESERVES IN THE LANGEBERG MUNICIPALITY AND IN VICINITY TO THE PROPOSED KHOE WEF SITE**

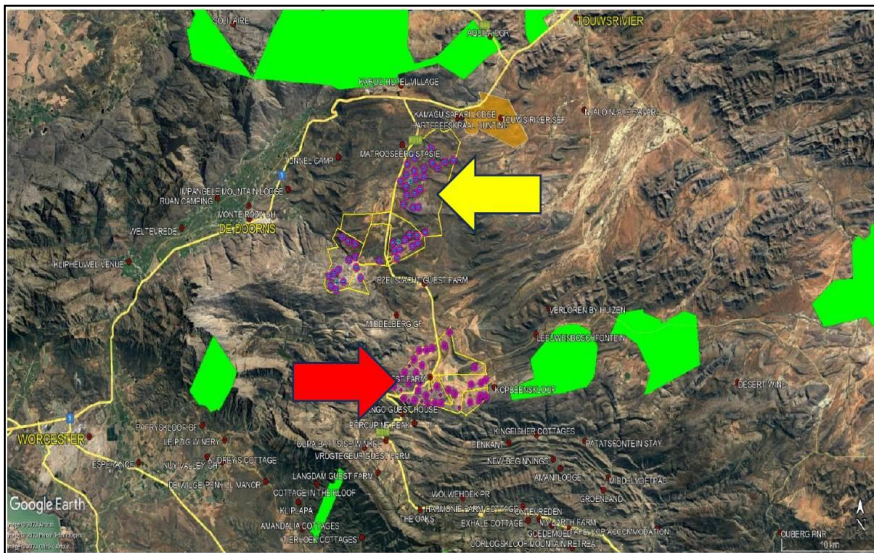
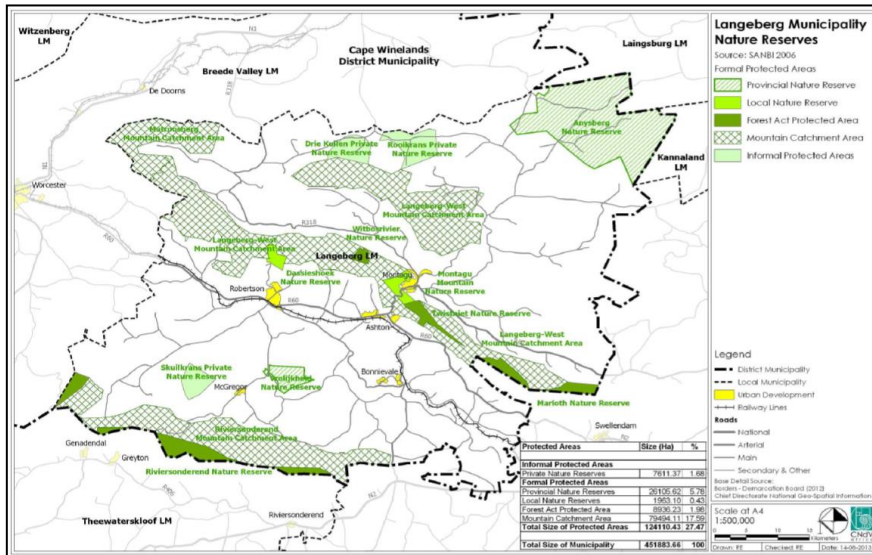


FIGURE 6-3 RESERVES AND PROTECTED AREAS



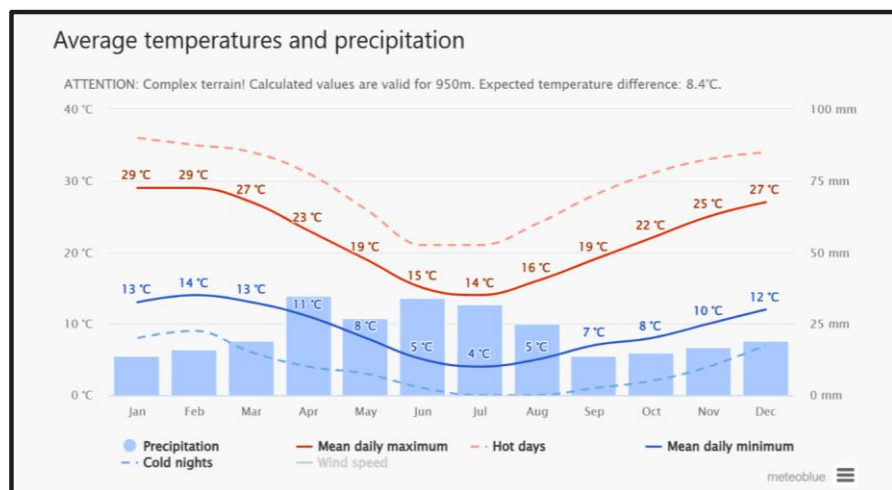
6.1.2 CLIMATE CONDITIONS

The proposed Khoe WEF is situated on a plateau, which is occasionally called the "Agterveld". Most of the precipitation occurs in winter with a second rainfall that is often experienced from October to December. Seasonal snow occurs during winter.

Long-term climate data from the nearby Matroosberg weather station, is used for a general climate description for the Khoe WEF. Generally, January and September are the driest months, with an average of 14 mm of rainfall. April is the peak rainfall month with an average rainfall of 35 mm (see Figure 6-4 below). There is a difference of approximately 21 mm between the wettest and driest months (meteoblue.com, 2023).

The average maximum temperature is 29°C and the average minimum temperature 4°C, while the highest maximum recorded temperature is 36°C, and the lowest minimum is 0°C. The hottest months of the year are January and February, while the coldest month of the year is July (meteoblue.com, 2023). Rainfall averages 300 mm per annum, but varies with altitude from 150-470 mm. This area is denoted as a winter-rainfall area, with frost evident for 10 to 40 days per year.

FIGURE 6-4 CLIMATE OF THE MATROOSBERG WEATHER STATION (METEOBLUE.COM, 2023)



### 6.1.3 GELOGY, SOILS, LAND USE AND AGRICULTURAL POTENTIAL

The geology found at the site mainly consists of sandstone, shale, siltstone, and mudstone of the Bokkeveld Group. It also consists of quartzitic and feldspathic sandstone of the Skurweberg and Rietvlei Formations, and Table Mountain Group (DAFF, 2002).

The project site is located within a Protected Agricultural Area according to DALRRD (2020). The soils found at the Project area are predominantly very shallow to moderately deep, medium to heavy textured soils on underlying rock. The dominant soils are shallow on underlying weathered bedrock of the Glenrosa, Hutton, Swartland, and Mispah soil forms. There is a high proportion of rock outcrops. The site is in an area where there is little crop production. The soils are limited in their agricultural potential by shallow depths, rockiness, and low water holding capacity and are unsuitable for crop production as a result, except in some lower-lying areas where accumulation leads to deeper soils, and limited cropping is practiced. With reference to the soil capability classification, which is marked out of 9 (DAFF, 2017), the soils at the Khoe WEF site are predominantly 2 (low-very low), 4 (low-moderate) and 5 (moderate). The agricultural land use in the surrounding area, as well as the site is dry rain-fed crop land production, as well as grazing.

### 6.1.4 FRESHWATER AND WETLANDS (AQUATICS)

The proposed PAOI falls within the Langeberg-West Catchment Area, which is an important water recharge area which has triggered the Very High Sensitivity in the Terrestrial Biodiversity Theme as an ESA 1. In addition, several watercourses are marked for restoration from other land use.

The study area is dominated by low lying drainage areas with riverine and drainage line systems, valley bottom wetland areas, seepage wetlands associated with several of the larger dams and one small depression. Dams and weirs / berms with no wetland or aquatic features were also common within the study area.

The site is situated within the North Langeberg Sandstone Fynbos, South Langeberg Sandstone Fynbos and Matjiesfontein Shale Renosterveld vegetation units, all forming part of the Die Brak river catchment. These vegetation units are not listed as a Threatened Ecosystem, by NEMA due to it being considered Endangered. A small southern portion of the site is located in the Koo River catchment however only one drainage feature associated with this catchment is located within the study area farm portions.

Further the area has seen a high degree of transformation in the form of cultivation areas, grazing, as well as the creation of several farm dams, roads and tracks. Of significance is the fact that most of the watercourses have either been converted into herring bone drain features or bermed to increase flows into downstream dams. This has then led to riverbed incision and the formation of the alluvial fans observed, i.e. sedimentation of low-lying downstream areas due to this and loss of vegetative cover.

The study area is located within the Southern Folded Mountain Bioregion, hence the diversity of high lying mountain catchments (mostly rocky) and the low-lying alluvial systems, but all located within the Breede-Olifants Catchment Management Agency and is the lead agent for water resources management within the Breede-Gouritz Water Management Area (BGWMA).

The Present Ecological State (PES) of a river, watercourse or wetland represents the extent to which it has changed from the reference or near pristine condition (Category A) towards a highly impacted system where there has been an extensive loss of natural habit and biota, as well as ecosystem functioning (Category E).

The PES scores have been revised for the country and based on the new models, aspects of functional importance as well as direct and indirect impacts have been included (DWS, 2014). The new PES system incorporates Ecological Importance (EI) and Ecological Sensitivity (ES) separately as opposed to Ecological Importance and Sensitivity (EIS) in the old model, although the new model is still heavily centred on rating rivers using broad fish, invertebrate, riparian vegetation and water quality indicators. The Recommended Ecological Category (REC) is still contained within the new models, with the default REC being B, when little or no information is available to assess the system or when only one of the above-mentioned parameters are assessed or the overall PES is rated between a C or D.

All of the systems assessed by DWS (2014) on a Subquaternary level within the study area were rated as PES = D or Largely Modified. While these were also rated as High in terms of Ecological Sensitivity and Very High in terms of Ecological Importance respectively, for SQ8809.

Based on the information collected during the field investigations, these ratings are verified and upheld for the riverine systems, i.e. systems were rated high (PES = D). The High Ecological Sensitivity rating for the natural water sources, is further substantiated by the fact that the affected catchments contain wetlands, included as Critical Biodiversity Areas, Ecological Support Areas, wetlands and rivers (Figure 6-6). Further, the sites are shown as National Freshwater Ecosystem Priority Area – NFEPA.

Overall, these catchment areas and subsequent rivers / watercourses are largely in a transformed state with localised impacts in some areas, which include the following:

- Erosion and sedimentation associated with road crossings;
- Grazing and farming

- Alien invasive trees / plants
- Impeded water flow due to several in channel farm dams; and

Lastly based on the observation made in the field, and the runoff generated by the site, the importance of these areas in terms of surface and ground water resources is thus valid, however should the wind farm footprint avoid any of the delineated areas, and place suitable stormwater management features in place, then little to no changes to the hydrological environment is anticipated.

The ground-truth delineations were compared to current waterbody inventories. These inventories include wetland spatial data based on landcover 2007 data, previous assessments and wetland information retained by the Provincial authorities, combined into one database that formed part of the updated National Spatial Biodiversity Assessment, 2018. Little was known or assessed previously for this site. A baseline map was then developed and refined using the 2023 survey data. The delineated wetlands, watercourse and depressions in relation to the site layout is shown in Figure 6-5.

**FIGURE 6-5 PROPOSED LAYOUT MAY 2024 IN RELATION TO DELINEATED WETLANDS, WATERCOURSES AND IN PLACES DEPRESSIONS**

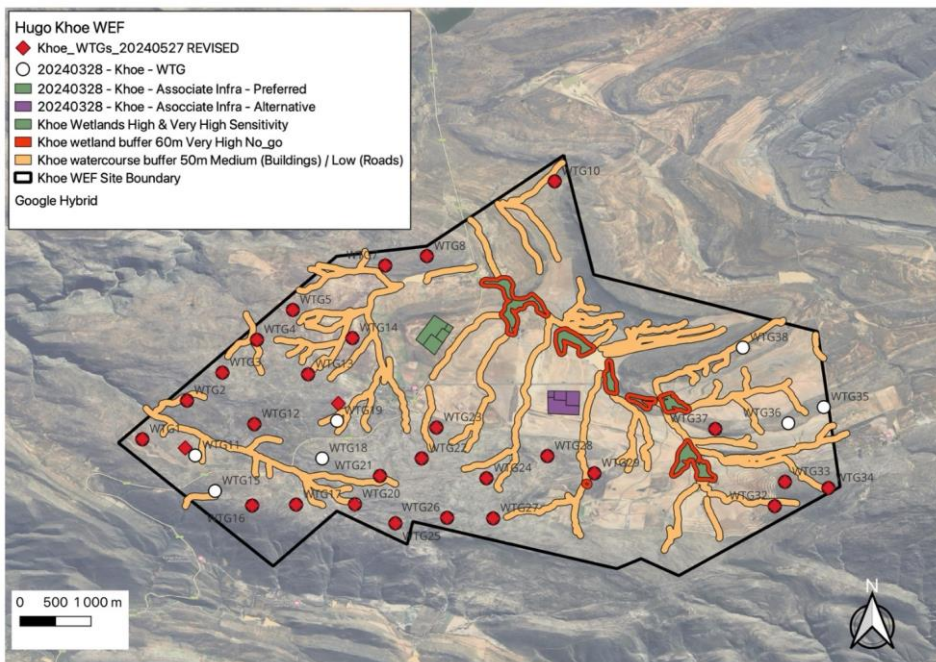
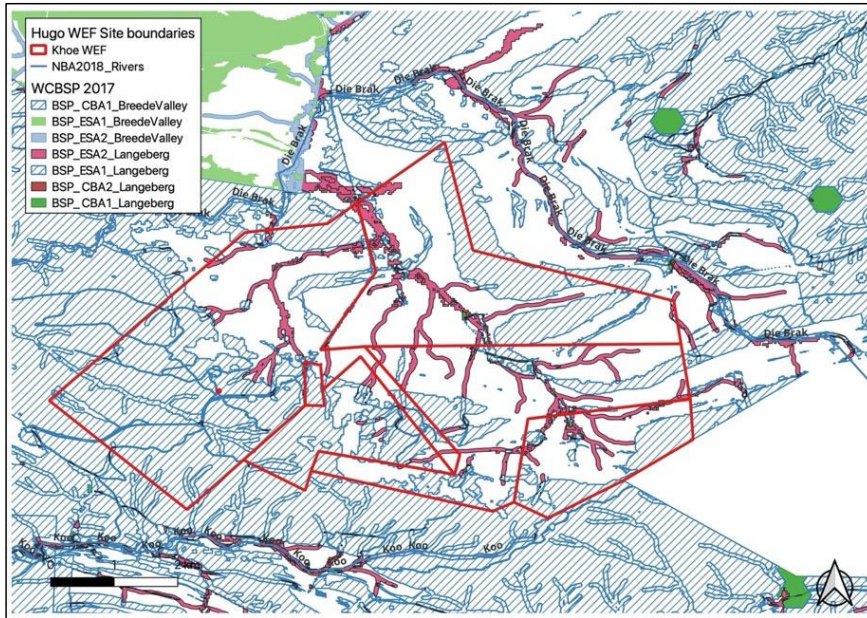




FIGURE 6-6 THE CRITICAL BIODIVERSITY AREAS AS PER THE WESTERN CAPE BIODIVERSITY SPATIAL PLAN – WCBSP 2017



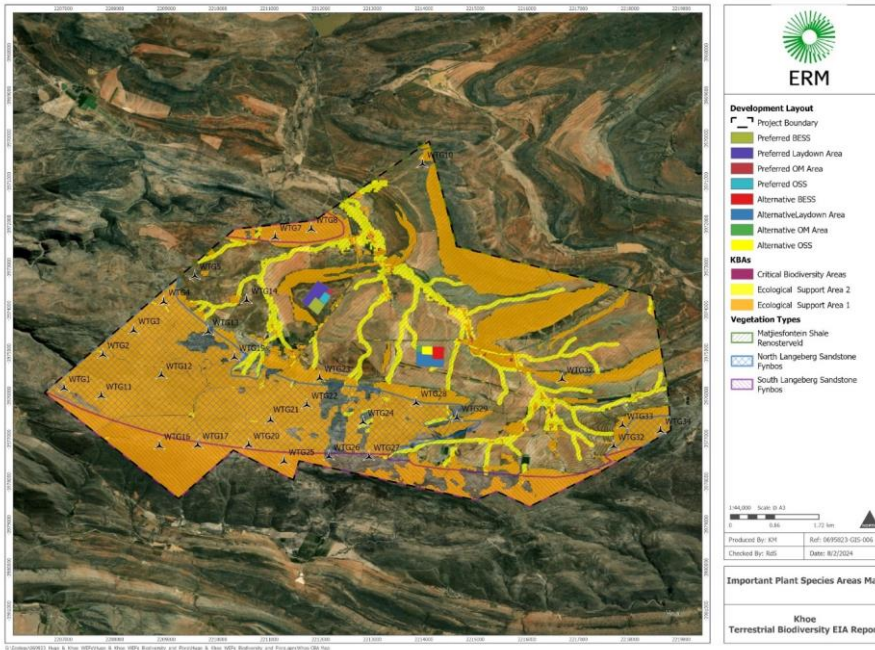
The sensitivity ratings of High No-go and Low were determined through an assessment of the aquatic habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems, but this is considered acceptable since these areas have already been impacted).

These proposed constraints / buffers do not include bird and or bat specialist buffers / constraints as their buffers along aquatic features are at times far larger around aquatic features, than those required for the known aquatic species within this region.

### 6.1.5 HABITAT/VEGETATION TYPES

The proposed Khoe WEF PAOI is dominated by Matjiesfontein Shale Renosterveld, followed by a section of North Langeberg Sandstone Fynbos and a smaller section of South Langeberg Sandstone Fynbos in the southern sections of the project PAOI. All three of the vegetation types identified are listed as Least Concern by the RLE (2022).

**FIGURE 6-7 IMPORTANT PLANT SPECIES AREAS WITHIN THE PROPOSED KHOE WIND ENERGY FACILITY STUDY AREA**



The landscape of the Matjiesfontein Shale Renosterveld is described as being elevated areas (low mountains, parallel hills and mid-altitude plateaus) of low, moderate density leptophyllous shrubland dominated by renosterbos (*Dicerothmanus rhinocerotis*). Heuweltjies, which are soil mounds associated with increased local biodiversity, have been recorded in low densities in some places<sup>41</sup>. The North and South Langeberg Sandstone Fynbos are similar in their constituent vegetation types of proteoid, restioid and ericaceous fynbos, differing only by occurrence altitude and also including asteraceous fynbos on lower slopes.

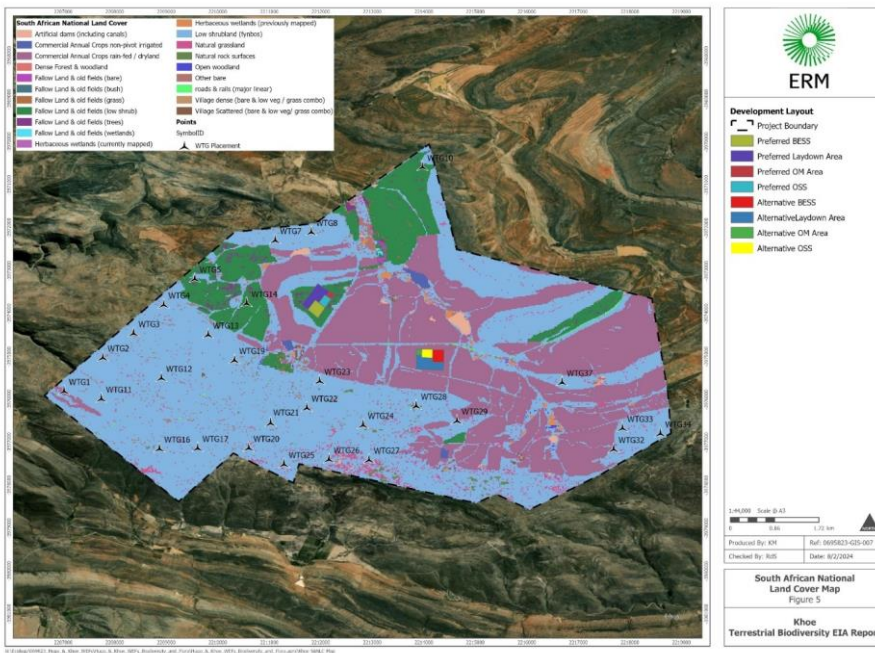
The majority of the site falls within ESA1, which is classified as such due to the presence of both aquatic and terrestrial features that contribute to broader ecological balance and processes that are essential in supporting biodiversity conservation. Areas identified as ESA2 are watercourses marked for rehabilitation from former land-use. Small areas identified as CBAs are due to the presence of aquatic features that maintain important ecological balance and processes that are essential in supporting biodiversity conservation. None of the WTG occur in the CBA, and are mostly distributed in ESA1 and ESA2, with some in areas not marked as important plant areas. According to the SANLC (2020) spatial dataset the proposed Khoehoe WEF PAOI is dominated by low fynbos shrublands, commercial annual crops (rain-fed, dryland or non-irrigated) and, fallow lands and old fields (low vegetation and grassland).

<sup>41</sup>Mucina, L. & Rutherford, M.C. (2006). The vegetation of South Africa, Lesotho and Swaziland. South African National Biodiversity Institute.

The ESAs must be maintained in a functional, near-natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functions are not compromised. CBA classified as such due to the presence of various aquatic features that contribute to high levels of biodiversity in this specific area, and currently includes no WTGs. CBAs must be maintained in a natural, or near-natural state with no further loss of natural habitat. Degraded areas in the CBA should be rehabilitated, and only low impact land uses are considered appropriate.

According to the SANLC (2020) spatial dataset, the proposed Khoe WEF PAOI (Figure 6-8) is dominated by low fynbos shrublands, commercial annual crops (rain-fed, dryland or non-irrigated) and, fallow lands and old fields (low vegetation and grassland). The site inspection confirmed that large portions of the proposed project site have been modified and / or disturbed through agricultural activity. Strips of natural vegetation that remain, particularly those around drainage lines, perennial rivers and farm dams, appear to be overgrazed

**FIGURE 6-8 THE LATEST AVAILABLE SOUTH AFRICAN NATIONAL LAND COVER DATASET OF THE PROPOSED KHOE WIND ENERGY FACILITY**



**6.1.6 FLORA**

A total of 1,782 plant species potentially occur in and/or within close proximity of the proposed Khoe WEF. The DFFE Online ST identified a single CR, four EN, 19 VU, 23 Rare and one Critically Rare plant species according to Regional Red Lists potentially present within the proposed study area (Table 6-1). The sources include the SANBI POSA Brahm's (B) database, the Global Biodiversity Information Facility (GBIF) database, The DFFE Online ST and the Biodiversity and Development Institute's Virtual Museum (VM) database.





**TABLE 6-1 PLANT SPECIES OF CONSERVATION CONCERN TRIGGERED BY THE DFFE ONLINE SCREENING TOOL**

Family	Species	Red List (Regional:Global)	Source
Aizoaceae	<i>Antimima condensa</i>	Rare:NE	B, ST
Aizoaceae	<i>Drosanthemum giffenii</i>	VU:NE	GBIF, ST
Aizoaceae	<i>Drosanthemum tuberculiferum</i>	EN:NE	GBIF, ST
Aizoaceae	<i>Esterhuysenia inclaudens</i>	Rare:NE	ST
Aizoaceae	<i>Vlokia ater</i>	Critically Rare:NE	GBIF, ST
Asparagaceae	<i>Asparagus mollis</i>	VU:NE	ST
Asteraceae	<i>Anderbergia elsiae</i>	Rare:NE	ST
Asteraceae	<i>Athanasia hirsuta</i>	Rare:NE	ST
Asteraceae	<i>Athanasia hirsuta</i>	Rare:NE	B, GBIF
Asteraceae	<i>Metalasia helmei</i>	Rare:NE	B, GBIF
Brassicaceae	<i>Heliophila elata</i>	VU:NE	ST
Ericaceae	<i>Erica constantia</i>	Rare:NE	ST
Ericaceae	<i>Erica costatisepala</i>	Rare:NE	ST
Ericaceae	<i>Erica glandulipila</i>	Rare:NE	ST
Ericaceae	<i>Erica setulosa</i>	Rare:NE	ST
Fabaceae	<i>Amphithalea pageae</i>	VU:VU	GBIF
Fabaceae	<i>Amphithalea spinosa</i>	VU:NE	B, GBIF, ST
Fabaceae	<i>Aspalathus aculeata</i>	VU:NE	ST
Fabaceae	<i>Aspalathus muraltioides</i>	EN:NE	ST
Fabaceae	<i>Aspalathus recurva</i>	VU:NE	ST
Fabaceae	<i>Aspalathus rostrata</i>	Rare:NE	B, ST
Fabaceae	<i>Aspalathus shawii</i> subsp. <i>longispica</i>	Rare:NE	GBIF, ST
Fabaceae	<i>Lotononis argentea</i>	VU:NE	GBIF, ST
Fabaceae	<i>Lotononis gracilifolia</i>	EN:NE	GBIF, ST
Fabaceae	<i>Otholobium</i> sp. nov (Storton & Zanotvska 11281 NBG)	VU:NE	ST
Iridaceae	<i>Ixia fucata</i>	Rare:NE	ST
Iridaceae	<i>Ixia fucata</i>	Rare:NE	GBIF
Iridaceae	<i>Ixia oxalidiflora</i>	VU:NE	B, GBIF
Iridaceae	<i>Ixia parva</i>	VU:NE	ST
Iridaceae	<i>Romulea malaniae</i>	CR:NE	B, ST
Iridaceae	<i>Romulea vlokii</i>	VU:NE	GBIF, ST
Orchidaceae	<i>Pachites bodkinii</i>	Rare:NE	ST

Family	Species	Red List (Regional:Global)	Source
Proteaceae	<i>Leucadendron cordatum</i>	Rare:LC	B, GBIF, ST
Proteaceae	<i>Protea rupicola</i>	EN:EN	ST
Restionaceae	<i>Restio aridus</i>	VU:NE	ST
Rhamnaceae	<i>Phyllica mairei</i>	Rare:NE	ST
Rubiaceae	<i>Nenax velutina</i>	Rare:NE	ST
Rutaceae	<i>Acmadenia matroosbergensis</i>	Rare:NE	B, GBIF, ST
Rutaceae	<i>Agathosma subteretifolia</i>	Rare:NE	B, ST
Rutaceae	<i>Diosma passerinoides</i>	VU:NE	ST
Thymelaeaceae	<i>Lachnaea oliverorum</i>	VU:NE	B, GBIF, ST
Withheld	Sensitive Species 1004	VU:NE	GBIF, ST
Withheld	Sensitive Species 1209	Rare:NE	ST
Withheld	Sensitive Species 142	VU:NE	ST
Withheld	Sensitive Species 207	Rare:NE	B, ST
Withheld	Sensitive Species 508	Rare:NE	ST
Withheld	Sensitive Species 521	VU:NE	ST
Withheld	Sensitive Species 654	VU:NE	ST

### 6.1.7 FAUNAL

A total of 586 animal species have been identified as potentially present on site. These include 259 invertebrate, 222 bird, 49 reptile, 46 mammal, and 10 amphibian species. Of these species 30 are regional SCC, and 29 are international SCC (Table 6-2). Online database records include the Black Browed Albatross (*Thalassarche melanophris*) which is a strictly marine species, several large mammal species with natural distribution ranges that do not intersect with the POAI (African Bush Elephant – *Loxodonta Africana*, Hippopotamus – *Hippopotamus amphibius*, Mountain Reedbuck – *Redunca fulvorufula*, and Plains Zebra – *Equus quagga*), and the African Lion (*Panthera leo*), which is listed as extinct within a historic distribution range which intersects with the PAOI. These records likely represent chance encounters and / or translocated individuals on private game farms.

TABLE 6-2 ANIMAL SPECIES OF CONSERVATION CONCERN POTENTIALLY PRESENT IN THE KHOE WEF PAOI

Family	Scientific Name	Red List Status (Regional:International)	Group	Source
Accipitridae	<i>Aquila verreauxii</i>	VU:LC	Aves	GBIF, ST
Accipitridae	<i>Buteo trizonatus</i>	LC:NT	Aves	GBIF
Accipitridae	<i>Circus maurus</i>	EN:EN	Aves	GBIF, ST, VM
Accipitridae	<i>Circus ranivorus</i>	EN:LC	Aves	GBIF

Family	Scientific Name	Red List Status (Regional:International)	Group	Source
Accipitridae	<i>Polemaetus bellicosus</i>	EN:EN	Aves	GBIF, ST
Anatidae	<i>Oxyura maccoa</i>	NT:EN	Aves	GBIF
Bovidae	<i>Damaliscus pygargus</i> subsp. <i>pygargus</i>	VU:NE	Mammalia	VM
Bovidae	<i>Pelea capreolus</i>	NT:NT	Mammalia	GBIF, VM
Bovidae	<i>Syncerus caffer</i>	LC:NT	Mammalia	VM
Chaetopidae	<i>Chaetops frenatus</i>	NT:NT	Aves	GBIF, VM
Ciconiidae	<i>Ciconia nigra</i>	VU:LC	Aves	GBIF, VM
Felidae	<i>Panthera leo</i>	LC:VU	Mammalia	VM
Felidae	<i>Panthera pardus</i>	VU:VU	Mammalia	GBIF, VM
Fringillidae	<i>Crithagra leucoptera</i>	NT:NT	Aves	GBIF
Gruidae	<i>Anthropoides paradiseus</i>	NT:VU	Aves	VM
Heliornithidae	<i>Podica senegalensis</i>	VU:LC	Aves	GBIF
Leporidae	<i>Bunolagus monticularis</i>	CR:CR	Mammalia	ST
Lycaenidae	<i>Aloeides caledoni</i>	Rare:LC	Invertebrates	ST
LYCAENIDAE	<i>Chrysoritis irene</i>	Rare:LC	Invertebrates	VM
Lycaenidae	<i>Chrysoritis rileyi</i>	EN:EN	Invertebrates	GBIF
Lycaenidae	<i>Lepidochrysops bacchus</i>	Rare:LC	Invertebrates	VM
Muscicapidae	<i>Monticola explorator</i>	LC:NT	Aves	GBIF
Mustelidae	<i>Aonyx capensis</i>	NT:NT	Mammalia	VM
Otididae	<i>Eupodotis afra</i>	VU:LC	Aves	GBIF, ST, VM
Otididae	<i>Neotis ludwigii</i>	EN:EN	Aves	VM
Phoenicopteridae	<i>Phoenicopterus minor</i>	NT:NT	Aves	VM
Picidae	<i>Geocolaptes olivaceus</i>	LC:NT	Aves	GBIF
Procellariidae	<i>Procellaria aequinoctialis</i>	VU:VU	Aves	GBIF

Family	Scientific Name	Red List Status (Regional:International)	Group	Source
Sagittariidae	<i>Sagittarius serpentarius</i>	VU:EN	Aves	GBIF
Scolopacidae	<i>Calidris ferruginea</i>	LC:NT	Aves	GBIF
Scolopacidae	<i>Calidris minuta</i>	LC:NT	Aves	GBIF
Synlestidae	<i>Ecchlorolestes peringueyi</i>	NT:NT	Invertebrates	VM
Testudinidae	<i>Psammobates tentorius</i> subsp. ?	NT:NT	Reptilia	VM
Testudinidae	<i>Psammobates tentorius tentorius</i>	NT:NT	Reptilia	VM
Turnicidae	<i>Turnix hottentottus</i>	EN:LC	Aves	GBIF

A total of 3,873 images of 4,513 animals were recorded by camera traps during the study. These represented 66 positively identified species. The most frequently recorded species across the study were sheep (*Ovis aries*), accounting for 1,232 (32%) of images. Cape Spurfowl (*Pternistis capensis*, 13%), hare sp. (*Lepus* sp. 9%), Black-backed Jackal (*Canis mesomelas*, 8.5%) and African Wildcat (*Felis lybica*, 4.6%) were also frequently recorded. However, multiple images of the same individual animals were recorded when they lingered in front of the camera trap sensor. A total of 2,778 independent records of 3,269 animals were recorded, with sheep, Cape Spurfowl, Black-backed Jackal and hare sp. nevertheless accounting for the bulk of independent records.

Two non-avian SCCs were included in the Screening Tool output, with *Insecta-Aloeides caledoni* and *Mammalia-Bunolagus monticularis* listed as Medium sensitivity. The desktop study revealed two SCCs potentially present in the study site that were not included in the Screening Tool output, namely Grey Rhebok (*Pelea capreolus*) and Leopard (*Panthera pardus*). Grey Rhebok were confirmed as present within the project site, while Riverine Rabbit was confirmed as present in the surrounding area but not within the project boundary. Leopard was considered to have a high probability of utilizing at least parts of the study site on occasion. The Caledon Copper (*Aloeides caledoni*) is considered Least Concern and unlikely to occur in areas identified for development (Table 6-3).

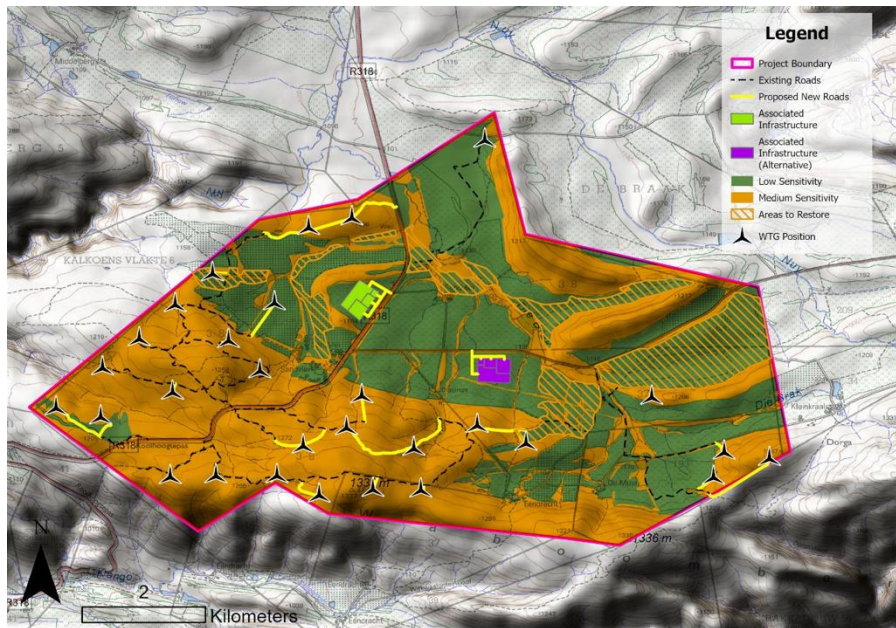
**TABLE 6-3 SPECIES OF CONSERVATION CONCERN CONFIRMED OR POTENTIALLY PRESENT ACROSS THE STUDY AREA**

Family	Common Name	Scientific Name	Status	Habitat	Source	Probability	Justification
Leporidae	Riverine Rabbit	<i>Bunolagus monticularis</i>	Critically Endangered	Low-lying scrub	Screening Tool	Confirmed	N/A
Bovidae	Grey Rhebok	<i>Pelea capreolus</i>	Near Threatened	Scrub, rocky hills and	Desktop Study	Confirmed	N/A

Family	Common Name	Scientific Name	Status	Habitat	Source	Probability	Justification
				modified fields			
Felidae	Leopard	<i>Panthera pardus</i>	Vulnerable	Scrub and rocky slopes	Desktop Study	High	Site located near suitable habitat of wide-ranging species
Lycenidae	Caledon Copper	<i>Aloides caledoni</i>	Least Concern	Rocky cliffs and mountain peaks	Screening Tool	Low-Medium	Small development area relative to potential habitat availability

The sensitivity mapping exercise resulted in areas of remaining natural/near-natural vegetation categorized as medium sensitivity based on condition and connectivity across the site (Figure 6-9). Heavily modified agricultural fields were categorized as low sensitivity, except in areas where their presence was undesirable from an overall ecological connectivity perspective, and a medium sensitivity categorization was retained.

FIGURE 6-9 SITE SENSITIVITY MAP FOR ANIMAL SPECIES OF CONSERVATION CONCERN



### 6.1.8 AVIFAUNA

#### 6.1.8.1 STUDY AREA

Bird habitat in the region consists of Matjiesfontein Shale Renosterveld but dominated agriculturally modified areas that fragment the natural vegetation. Low rocky ridges provide

perch sites and topographic highs for soaring birds. The agricultural fields are rarely punctuated by small trees that grow around water points. Few grasses are found, with the main land use being sheep farming. Some of the large farm dams provide ideal habitat for the Blue Cranes that are common throughout the area on the agricultural lands.

Power lines run north of the proposed site (through the Hugo site) while small stands of mature poplars occur in water courses outside the study areas. Both artificial habitats provide unexpected nesting habitat for large eagles while, surrounding cliffs, also off site, provide suitable breeding cliffs for Verreaux's Eagles.

#### 6.1.8.2 SCREENING STUDY

The initial assessment of the Khoe site combined the SABAP2 records (n = 80 cards from 14 pentads) and the results of first bird surveys in January 2022. This revealed:

- 206 species of bird have been recorded by SABAP2 data around the site;
- 21 of these species are Priority (top 100) collision-prone species;
- 7 of the 21 Priority Collision-prone species are Red Data (RD) species from SABAP2 data;
- Four of the 7 Red Data species likely to occur (SABAP2) was recorded over the proposed Khoe site (Table 6-4); and

The position of a Verreaux's Eagle nest was supplied to by an I&AP, and is plotted in the Figure 6-11 below.

All (21) Priority collision-prone species in the top 100 Priority species including the (10) Red Data birds (in red) recorded in bird atlas data (2008-2022) around the proposed KHOE WEF site. The (4) grey-shaded species occurred in the proposed WEF in our January 2022 site visit. Those with reporting rates over 10% are regarded as relatively regular visitors to the area. (Table 6-4).

TABLE 6-4 PRIORITY COLLISION-PRONE SPECIES

Common name	Scientific name	Red-list status	Reporting Rate*	Susceptibility to:	
				Collision Rank**	Disturbance
Verreaux's Eagle	<i>Aquila verreauxii</i>	Vulnerable	26%	2	Moderate
Martial Eagle	<i>Polemaetus bellicosus</i>	Endangered	9%	5	High
Black Harrier	<i>Circus maurus</i>	Endangered	19%	6	High
Blue Crane	<i>Anthropoides paradiseus</i>	Near Threatened	27%	11	Moderate
Lanner Falcon	<i>Falco biarmicus</i>	Vulnerable	14%	22	moderate
African Fish Eagle	<i>Haliaeetus vocifer</i>	Least Concern	15%	27	moderate
Southern Black Korhaan	<i>Afrotis afra</i>	Vulnerable	21%	35	Low
Cape Eagle Owl	<i>Bubo capensis</i>	Least Concern	5%	41	Moderate
Jackal Buzzard	<i>Buteo rufofuscus</i>	Least Concern	49%	42	Low
Peregrine Falcon	<i>Falco peregrinus</i>	Least Concern	6%	45	moderate

				<b>Susceptibility to:</b>	
Booted Eagle	<i>Aquila pennatus</i>	Least Concern	19%	55	Low
Karoo Korhaan	<i>Eupodotis vigorsii</i>	Near Threatened	50%	49	Low
Steppe Buzzard	<i>Buteo vulpinus</i>	Least Concern	11%	67	Low
Pale Chanting Goshawk	<i>Melierax canorus</i>	Least Concern	44%	73	Low
African Harrier Hawk	<i>Polyboroides typus</i>	Least Concern	14%	85	Low
Spotted Eagle Owl	<i>Bubo africanus</i>	Least Concern	12%	100	low

### 6.1.8.3 SENSITIVITY

The Khoe study is ranked as low sensitivity from a national avifaunal perspective. However, the DFFE Screening tool

[https://screening.environment.gov.za/screeningtool/#/app/screen\\_tool/Wind](https://screening.environment.gov.za/screeningtool/#/app/screen_tool/Wind) did not support this classification, as it ranked the area as High Sensitivity for the Animal Species Theme. The main reason for the triggered high sensitivity was the presence of Vulnerable Verreaux's Eagles *Aquila verreauxii*.

This was verified during the field work in which Verreaux's Eagles were recorded just outside the eastern boundary of the site in the Scoping study and an (inactive) Martial Eagle nest about 3.5 km west of the western boundary was located in February 2022.

While Black Harriers were not recorded on the Khoe site in the Scoping Report they were subsequently recorded in more appropriate seasons (spring), and this verifies:

- The SABAP2 data Reporting Rate suggesting birds will occur with 19% likelihood; and
- the Black Harrier Habitat Suitability Model (HSM: In Simmons et al. 2020) predicts that the habitat in the western section has a 20-40% probability of holding breeding Black Harriers.

This Endangered species was incorporated into the risk assessment undertaken by the CRM.

The DFEE Screening Tool Theme for Wind energy facilities and Birds ranked the area as Low Sensitivity. Thus, while the Birdlife Sensitivity Map concurs with the DFFE Screening Tool for Wind energy facility and birds, both disagree with the Screening Tool output for the Animal Theme. We agree with the Animal Theme that the site is of High Sensitivity given the number of Red Data species.

### 6.1.8.4 COLLISION PRONE SPECIES

Of the eight Red Data species the most frequently encountered species was the Blue Crane which performed 93% of all flights recorded over the wind farm over 12 months. Verreaux's Eagle was the next most common species recorded and both species combined accounted for 98% of all flights (Table 6-5). The Passage Rate for all Priority species was 2.55 flights per hour of which the RD species were the major component at 2.18 flights per hour.

All Collision Prone species (ordered from most to least likely) including RD species and their individual Passage Rates (flights/hour) on the Khoe WEF and Control sites. Note that only

seven with sufficient data could be included in the CRM. Those species with fewer than four flights did not reach the threshold for inclusion.

**TABLE 6-5 COLLISION PRONE SPECIES**

Species	WEF flights	Species Passage Rates	Control flights	Species Passage Rates	Collision Rank
Number of hours	465 h		62.5 h		
Verreaux's Eagle VU	52	0.11			2
Martial Eagle EN	5	0.01			5
Black Harrier EN	8	0.02			6
Ludwig's Bustard EN	2	0.00			10
Blue Crane NT	940	2.02			11
Lanner Falcon VU	4	0.01			22
African Fish Eagle	0	-	1	0.02	27
Black Korhaan VU	1	0.00			35
Jackal Buzzard	50	0.11	1	0.02	42
Peregrine Falcon	3	0.01			45
Karoo Korhaan NT	2	0.00			49
Booted Eagle	48	0.10	1	0.02	55
Yellow-billed Kite	2	0.00			60
Pale Chanting Goshawk	29	0.06	10	0.2	73
Grey-winged Francolin	2	0.00			82
African Harrier Hawk	5	0.01			85
Black-winged Kite	7	0.02			96
Greater Kestrel	1	0.00			97
Spotted Eagle Owl	1	0.00			100
Totals: 8 RD species 11 LC species	1,014	2.18 flights/h	13	-	
	148	0.31 flights/h		0.26 flights/h	
All Priority species (n = 19)	1,162	2.49 flights/h			

#### 6.1.8.5 BLUE CRANES AND VERREAUX'S EAGLES

Blue Cranes were the most common species encountered on site and were present on the agricultural field in pairs and threesomes (adults with a youngster). A centrally placed dam in

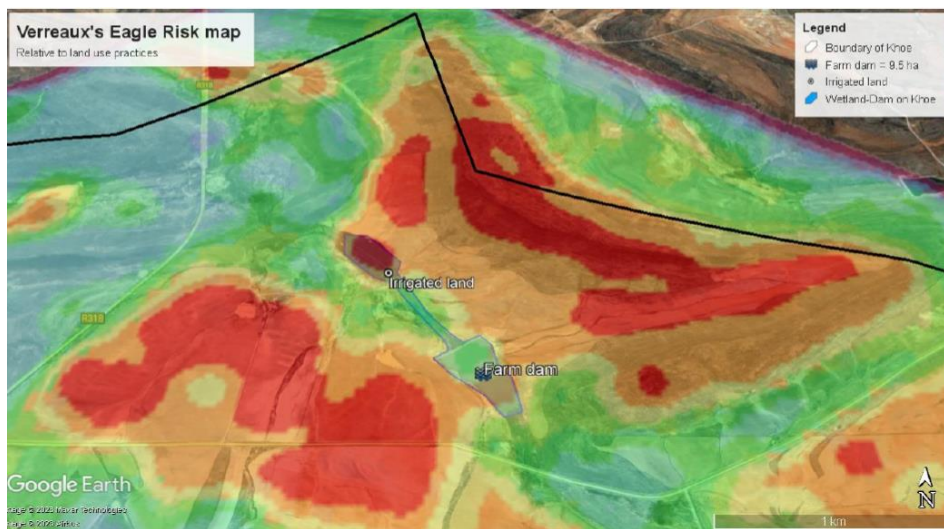


the centre of the site was also a mecca for other cranes, that habitually came to roost there. Roosting cranes frequently travel some distance to water as a protection against terrestrial predators (Allan 2005). This dam will, thus, increase the presence of Blue Cranes here.

It was also noted that the dam was one of the foci for the risky flight paths highlighted by the CRM output for the Verreaux's Eagles on Khoe WEF.

Figure 6-10 displays the individual CRM map output for Verreaux's eagles. note the high use (= red polygons) of the highland ridge to the north, and the overflights of the 9.5 ha farm dam. and the irrigated land to the north. thus, the eagles were using the ridges as expected but also foraging over the dam and lands to the west.

**FIGURE 6-10 INDIVIDUAL CRM MAP OUTPUT FOR VERREAUX'S EAGLES IN THE NORTHERN SECTION OF THE KHOE STUDY SITE**



#### 6.1.8.6 NEST BUFFERS

Of the 29 proposed turbines, all avoid the riskiest areas predicted by the CRM. Note that some of them fall within the 3.7 km Verreaux's Eagle circular nest buffer, (Figure 6-11) but no risk areas were identified for eagles within the sliver of the buffer inside the south-west boundary. For this reason, the CRM results were favoured as more precise than the coarse buffer approach. From the spatially explicit CRM for the RD and LC species combined (Figure 6-12), the area lost to development is approximately 2,739 ha of the 4,113 ha site (66.6%). Thus about 1,374 ha remain for development or ~33% of the area.

FIGURE 6-11 FLIGHT RISK MODEL VULNERABILITY MAP FOR FOUR RD SPECIES

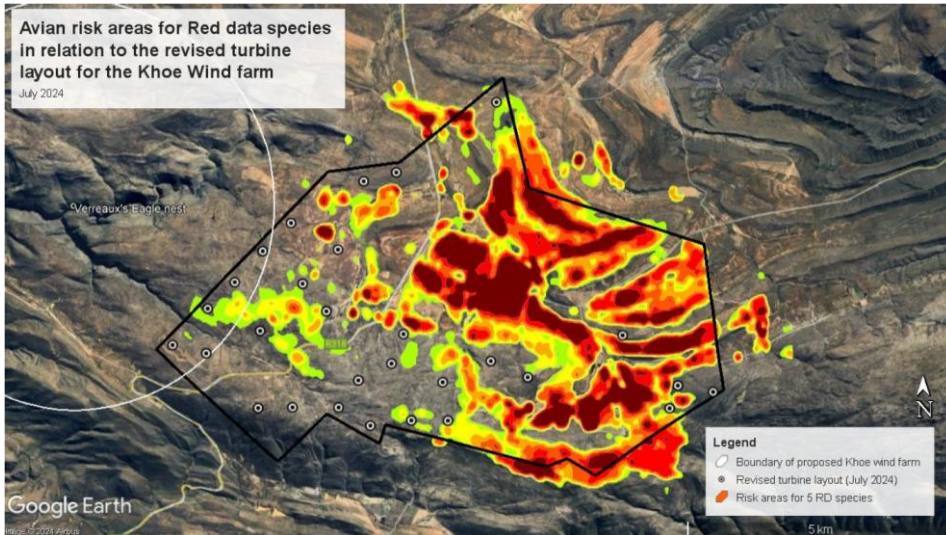
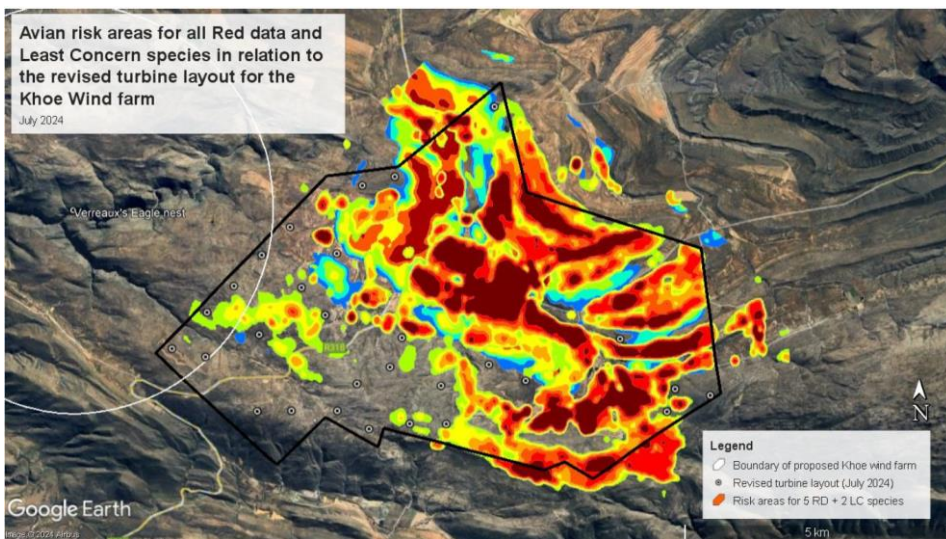


FIGURE 6-12 THE COMBINED CRM RISK VULNERABILITY MAP FOR THE FOUR RD AND TWO LC SPECIES



6.1.8.7 SUMMARY OF CRM

- Of the nine Priority species recorded on the proposed Khoe wind energy facility, six (4 RD and 2 LC) had sufficient data to allow collision risk assessments to be undertaken.
- Most RD species' risky flight minutes could be captured by setting the No-Go areas for wind turbines at the Class level 5.0 and above.

- Most of these higher risk areas for the RD species were clustered together in the east, north-eastern, and central areas of the proposed wind farm, allowing us to reduce risk (by about 70%) for these species (by designating them No-Go for turbine development).
- The majority of higher risk areas for the LC species were clustered together in the central and north areas of the proposed wind farm, allowing us to reduce risk (by about 50%) for these species (by designating them No-Go for turbine development).
- There was considerable overlap between the spatially explicit risk maps for RD and LC species making it easier to designate areas of high-risk for both groups of Priority birds.
- All turbines (100% of 29) in the final layout were placed by the developer outside the high-risk areas revealed by the CRM.

## 6.2 NOISE

Most dwellings featuring in the vicinity of the project focus area are scattered in a heterogeneous fashion, typical of a rural farming area. Croplands, animal husbandry and limited residential activities (farmers and workers with their families) are predominant in the study area.

The R318 transects the Project Focus Area (PFA) in a north to/from the south-west, though traffic on this road is generally very low. Noise from vehicular traffic will not be considered in this ENIA report. There are a number of small access roads leading from the R318, mainly to serve the farmers in the area. Traffic volumes on these small access roads are low and will be of no acoustical significance.

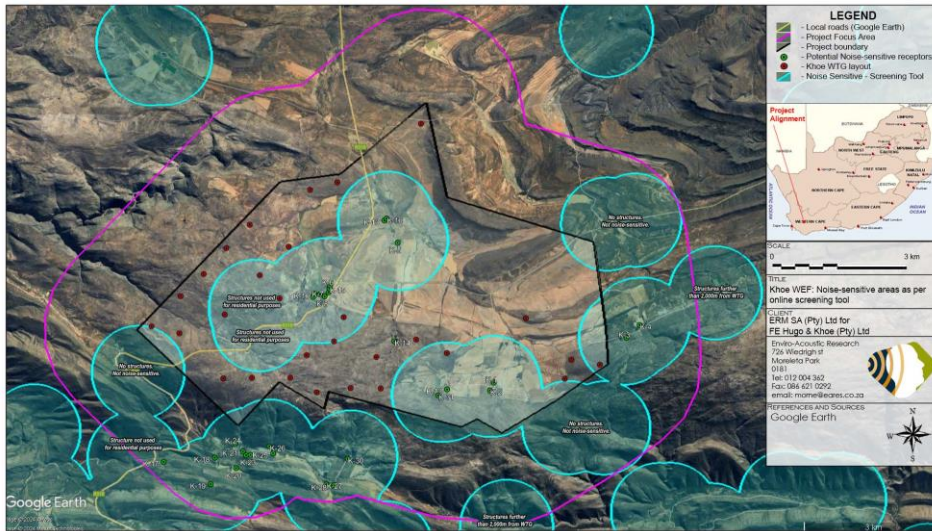
There are a number of small access roads leading from the R318, mainly to serve the farmers in the area. Traffic volumes on these small access roads are low and will be of no acoustical significance.

Potential Noise-sensitive receptors (NSR) were initially identified using aerial images, as well as the DFFE Screening Tool, with the statuses of the NSR verified during the site visit in December 2022 and September 2023, refer to Figure 6-13 below. The NSR as identified were given buffers of either 500 m, 1,000 m or 2,500 m. Generally, noise from wind turbines, depending on the layout, as well as the specific sound power emission levels of the selected wind turbine:

- Could be significant within 500 m, with receptors staying within 500 m from operational wind turbines subject to noises at a potentially sufficient level to be considered disturbing.
- Are normally limited to approximately 1,000 m from operational wind turbines. Night-time ambient sound levels are elevated, and the potential noise impact might be measurable. Cumulative noises from multiple wind turbines surrounding an NSR may be high and exceed 45 dBA.
- May be audible up to 2,500 m at night.
- Are generally of a low concern at a distance greater than 2,500 m.



**FIGURE 6-13 POTENTIAL NOISE-SENSITIVE RECEPTORS (NSR) IDENTIFIED BY THE DFFE SCREENING TOOL**



The following was highlighted:

- NSR K-14 is mainly a structure used for storage and bathroom, with the area used occasionally for camping by the land owner (family and friends). The potential noise levels were calculated for this location, but the probability of a noise impact occurring set to 1; and
- the Leeuwenboschfontein Observatory raised a concern about potential light pollution, and the EAP asked that this receptor be added to the list of NSR. This receiver however is well further than 5,000 m from the closest WTG and noises from WTG will definitely be well less than 20 dBA. The significance of a noise impact at this receiver would be low. This receiver was therefore not included as an NSR in this assessment.

Considering the average fast-weighted sound level data collected in the area, average:

- daytime fast-weighted sound levels ranged from less than 20.0 to more than 75.0 dBA, with average sound levels being 43.7 dBA. The average equivalent level over the full daytime periods is 54.9 dBA for the 6 measurement locations. Only considering the average fast-weighted values, sound levels are typical of a rural noise district, setting a zone sound level of 45 dBA for the daytime period; and
- night-time fast-weighted sound levels ranged from less than 20.0 to more than 75 dBA, with average sound levels being 33.1 dBA. The average equivalent level over the full night-time periods is 47.8 dBA for the 6 measurement locations. Only considering the average fast-weighted values as well as the developmental character of the area, a zone sound level of 35 dBA would be used (typical of a rural noise district).

**FIGURE 6-14 PROJECT LAYOUT, PROPOSED ROADS AND OTHER INFRASTRUCTURE LOCATIONS FOR KHOE WEF**



### 6.3 BATS

The site is covered in typical Matjiesfontein Shale Renosterveld, South Langeberg Sandstone Fynbos, and North Langeberg Sandstone Fynbos. Although the natural vegetation does not support trees, there are limited trees situated in the non-perennial riverbeds and clumps of large trees near farm dwellings, which could provide roosting opportunities for bats that prefer roosting in vegetation or under the bark of trees. There are also areas with numerous termite/ant hills, which indicate an abundance of food for bats during certain times of the year.

The proposed wind farm falls within the distributional ranges of six bat families and approximately 12 bat species. Table 6-6 is informed by the most recent distribution maps of Monadjem et al. (2020) and will be updated as required, based on the outcomes of the monitoring programme.

Of the 12 bat species that have distribution maps overlaying the proposed development area, three have a Near Threatened status one a Vulnerable conservation status in South Africa, while two have a global conservation status of Near Threatened. The Long-tailed serotine, the Angolan wing-gland bat and Cape horseshoe bat are endemic to Southern Africa and have limited suitable habitat left, mainly due to agricultural activities (Monadjem 2020).

The latest Pre-Construction Guidelines identify the likelihood of fatality risk (MacEwan et al 2020). Based on this, six species have a high risk of fatality due to their foraging habits at high altitudes, namely Egyptian free-tailed, Roberts's flat-headed bat, Cape roof bat and Natal long-fingered bat. The two fruit bat species, African straw-coloured fruit bat and Egyptian rousette also have a high risk of fatality, while Temminck's myotis bat has a medium-high risk, and Long-tailed serotine has a medium risk of fatality.

The two fruit bats are not expected to roost on the project site itself. Due to the lack of fruit trees in the area, this environment is not their preferred habitat. However, the proximity of the mountains around the site, the agricultural activities of the Hex River Valley situated in the north-westerly direction, and the presence of water sources in the area, might attract fruit bats if they migrate over the area. The possibility that they could sporadically be present in the development area should not be ruled out.

Geoffroy's horseshoe bat was recorded in the surrounding area, but not on the Khoe terrain. There is a high likelihood that some of the bat species belonging to the genus *Rhinolophus* might occur in the more densely vegetated valleys. As indicated by Table 6-6 these bats are clutter foragers and have a low likelihood of fatality risk

TABLE 6-6 POTENTIAL BAT SPECIES OCCURRENCE ON THE PROPOSED KHOE WEF

Family	Species	Common Name	SA conservation status	Global conservation status (IUCN)	Roosting habitat	Functional group (type of forager)	Migratory behaviour	Likelihood of fatality risk*	Bats confirmed at Khoe and surroundings	Bats recorded on the Khoe project site
PTEROPODID AE	<i>Eidolon helvum</i>	African straw-coloured fruit	Not evaluated	Least Concern	Little known about roosting behaviour	Broad wings adapted for clutter. Studies outside of South Africa list fruit and flowers in its diet.	Migrator. Recorded migration up to 2 518 km in 149 days, and 370 km in one night.	High		
	<i>Rousettus aegyptiacus</i>	Egyptian rousette	Least Concern	Least Concern	Caves	Broad wings adapted for clutter. Fruit, known for eating Ficus species.	Seasonal migration up to 500 km recorded. Daily migration of 24 km recorded.	High		
MINIOPTERID AE	<i>Miniopterus natalensis</i>	Natal long-fingered bat	Least Concern	Least Concern	Caves	Clutter-edge, insectivorous	Seasonal, up to 150 km	High	✓	✓

Family	Species	Common Name	SA conservation status	Global conservation status (IUCN)	Roosting habitat	Functional group (type of forager)	Migratory behaviour	Likelihood of fatality risk*	Bats confirmed at Khoe and surroundings	Bats recorded on the Khoe project site
NYCTERIDAE	<i>Nycteris thebaica</i>	Egyptian flit-faced bat	Least Concern	Least Concern	Cave, Aardvark burrows, road culverts, hollow trees. Known to make use of night roosts.	Clutter, insectivorous, avoid open grassland, but might be found in drainage lines	Not known	Low		
MOLOSSIDAE	<i>Tadarida aegyptiaca</i>	Egyptian free-tailed bat	Least Concern	Least Concern	Roofs of houses, caves, rock crevices, under exfoliating of rocks, hollow trees	Open-air, insectivorous	Not known	High	✓	✓
	<i>Sauromys petrophilus</i>	Robert's Flat-faced	Least Concern	Least Concern	Narrow cracks, under exfoliating of rocks, crevices.	Open-air, insectivorous		High	✓	✓
RHINOLOPHIDAE	<i>Rhinolophus capensis</i>	Cape horseshoe bat (endemic)	Near Threatened	Near Threatened	Caves, old mines. Night roosts used	Clutter, insectivorous	Not known	Low		



Family	Species	Common Name	SA conservation status	Global conservation status (IUCN)	Roosting habitat	Functional group (type of forager)	Migratory behaviour	Likelihood of fatality risk*	Bats confirmed at Khoe and surroundings	Bats recorded on the Khoe project site
	<i>Rhinolophus clivosus</i>	Geoffroy's horseshoe bat	Near Threatened	Least Concern	Caves, old mines. Night roosts used	Clutter, insectivorous		Low	✓	
VESPERTILIONIDAE	** <i>Laephotis capensis</i> ( <i>Neoromicia capensis</i> )	Cape roof bat (Cape serotine)	Least Concern	Least Concern	Roofs of houses, under bark of trees, at basis of aloes	Clutter-edge, insectivorous	Not known	High	✓	✓
	<i>Myotis tricolor</i>	Temminck's myotis	Near Threatened	Least Concern	Roosts in caves, but also crevices in rock faces, culverts, and manmade hollows	Limited information available	Not known	Medium-High		
	<i>Eptesicus hottentotus</i>	Long-tailed serotine (endemic)	Least Concern	Least Concern	Caves, rock crevices, rocky outcrops	Clutter-edge, insectivorous	Not known	Medium	✓	✓
	<i>Cistugo seabrae</i>	Angolan wing-gland bat (endemic)	Vulnerable	Near Threatened	Possibly buildings, but no further information	Clutter-edge, insectivorous	Not known	Low		

\*Likelihood of fatality risk as indicated by the Pre-Construction Guidelines (MacEwan et al. 2020b).

\*\**Neoromicia capensis* has been reclassified as *Laephotis capensis* (Cape roof bat).

Cape roof bat is the most abundant species (55%). In total 37% of the calls are those of the high-flying Egyptian free-tailed bat, which has a narrow wing morphology adapted for open air. 4% of Natal long-fingered bat, 3% of the Robert's Flat-faced, and a statistically insignificant number of the endemic Long-tailed serotine have also been recorded.

On 11 March 2023, a point source was deployed at the dam near the Sandvlei farm dwellings. Only four calls of Cape roof bat were recorded, but this confirms the presence of this species at Sandvlei. Further point sources at Sandvlei, on the eastern side of the R318 road, were deployed in April 2024, but no further bat calls were recorded.

Higher activity was portrayed approximately two hours after sunset, when bats emerge to forage and drink water, with a peak in activity around three hours after sunset. Steady high activity occurs for the first seven hours after sunset, between 21:00 and 00:00, and a significant decline in activity is shown from midnight to approximately two hours before sunrise. Note that these figures are a summary of all seasons and thus a generalisation. These patterns are of importance if mitigation measures are to be developed, as they indicate the most active periods during the night.

## 6.4 SOCIO-ECONOMIC

The study area is located within the Langeberg Local Municipality, which forms part of the Cape Winelands District Municipality. The Cape Winelands District Municipality (WDM) is a category C municipality that is made up of five local municipalities namely, Breede Valley, Drakenstein, Langeberg, Stellenbosch and Witzenberg municipalities. The town of Montagu is the administrative seat of the LM.

### 6.4.1 POPULATION

The 2020 Socio-Economic Profile (SEP) for the Langeberg Municipality (LM) prepared by the Western Cape Department of Social Development, indicates that the population of the LM in 2020 was 118,434 making it the second most populated municipality in the Winelands district Municipality. The population is projected to be 126,640 by 2024 which equates to a 1.7% annual average growth rate. Based on the 2022 Census data the population of the LM was 94,045, which is lower than the SEP figure and raises concerns about the accuracy of the 2022 Census data. The total number of households was 25,370, with an average household size of 3.7, slightly lower than the 3.9 figure for 2011.

Based on the SEP, young children under the age of 15 made up 29% of the population, the working age cohort (15-64) made up 65% and people 65 years and older made up 6%. Based on these figures the dependency ratio was 54%. Based in the data from Census 2022, children under the age of 15 made up 22.6%, the working age cohort (15-64) made up 69.7% and people 65 years and older made up 7.6%. Based on these figures the dependency ratio was 43.4%. The higher the dependency ratio the larger the percentage of the population dependent on the economically active age group. This in turn translates reduced revenue for local authorities to meet the growing demand for services. The difference between the 2020 SEP and 2022 Census data is therefore a concern.

The available 2022 Census data does not provide information on race groups or language. Based on the 2016 Community Household Survey Coloureds made up 75%, followed by Black Africans (17%) and Whites (12%). The main first language spoken was Afrikaans (80%), followed IsiXhosa (13%) by English (3%) (Community Household Survey 2016).

### 6.4.2 HOUSEHOLD TYPES

There were a total number of 236,480 (2020) and 30,690 (2020) households in the Cape Winelands District and Langeberg Local Municipality respectively. Of these, 91.3% (Langeberg Local Municipality) and 82.4% (Cape Winelands District) were formal main dwellings. Approximately 2.3% of the structures in the Langeberg Local Municipality and 10.8% in Cape Winelands District were shacks. Most dwellings in the Langeberg Local Municipality and Cape Winelands District are therefore formal structures. In 2016, 46% of the properties in the Langeberg Local Municipality were owned and fully paid off, while 9% of properties were occupied rent free. In the Cape Winelands District, 2016 figures indicated that 17% of properties were occupied rent free (Community Survey, 2016). In 2016, it was reported that approximately 31.6% of the households in the Langeberg Local Municipality and 34.19% of the households in Cape Winelands District were headed by women (Community Survey, 2016). These figures are lower than the Western Cape provincial rate of 38.04% (Community Survey, 2016). Despite the figures for the Langeberg Local Municipality being lower than the district and provincial percentages, women headed households tend to be more vulnerable.

### 6.4.3 HOUSEHOLD INCOME

At the time of preparing the report no data on household income was available from the 2022 Census. The data is therefore still based on 2011 Census. Based on this data, 10% of the population of the LM had no formal income, 2% earned less than R 4,800, 4% earned between R 5,000 and R 10,000 per annum, 16% between R 10,000 and R 20,000 per annum and 25% between R 20,000 and R 40,000 per annum (2011).

The poverty gap indicator produced by the World Bank Development Research Group measures poverty using information from household per capita income/consumption. This indicator illustrates the average shortfall of the total population from the poverty line. This measurement is used to reflect the intensity of poverty, which is based on living on less than R3,200 per month for an average sized household (~ R 40,000 per annum). Based on this measure, in the region of 57% of the households in the LM live close to or below the poverty line. The figures for the Cape Winelands District Municipality and Western Cape were 53.7% and 50.1% respectively. The low-income levels reflect the limited employment opportunities and dependence on the agricultural sector. This is also reflected in the high unemployment rates. The low-income levels are a major concern given that an increasing number of individuals and households are likely to be dependent on social grants. The low-income levels also result in reduced spending in the local economy and less tax and rates revenue for the LM. This in turn impacts on the ability of the LM to maintain and provide services.

### 6.4.4 EMPLOYMENT

The 2020 SEP for the LM Municipality notes that the unemployment rate in the LM has been between 4.1 and 7.2% over the last 10 years and was 7.2% in 2019. The figures are lower than WDM and provincial figures over the same period. The figure for the Western Cape in 2020 was 18.9%.

### 6.4.5 EDUCATION

Based on the information contained in the SEP, the matric pass rate in the LM was 73.8% in 2020, down from 79% in 2019 and 79.5% in 2018. After the Witzenberg and Breede Valley Municipality, the LM had the lowest matric pass rate in the WDM in 2020.

## 6.5 HERITAGE AND ARCHAEOLOGY

In 2012 ACO Associates conducted an archaeological assessment prior to the raising of the Keerom Dam wall, west of the WEF site (Halkett, 2012). Although the assessment recorded several stone age artefacts around the periphery of the dam, "the majority of these are isolated finds (probably Early Stone Age (ESA) or Middle Stone Age (MSA)) amongst which no diagnostic formal elements were noted" (Halkett 2012:8).

Kaplan undertook two archaeological assessments to the north-east of the Khoe WEF. In 2010 he surveyed an area at Nougá proposed for agricultural expansion and recorded large numbers of stone artefacts dating from the Middle (MSA) and Later Stone Ages (LSA). He also located what he referred to as a LSA factory site with many stone artefacts, including several formal tools (Kaplan 2010).

In a survey for the proposed Vredefort solar energy facility south of Touws River, Kaplan (2015) found a widespread background scatter of mainly MSA lithics of the sort that is common in the Karoo. It is important to note that both of Kaplan's study areas were on a plain and located about 350 m lower than the mountainous and hilly Khoe WEF study area.

Most recently, Orton (2022) conducted an archaeological assessment for the proposed Ezelsjacht WEF which is located a little more than 1 km north of the Khoe WEF. The results of Orton's (2022) survey for the Ezelsjacht WEF reflected the well-established finding that archaeological materials and sites are not common in high-lying terrain, with only a few archaeological sites found. The most important was a LSA site with several retouched stone artefacts, and a scatter of LSA materials in a small dune field. Orton (2022) also reported some historical archaeological resources comprising mainly stone-walled kraals.

Due to the geology of the Karoo, caves and rock shelters are very rare and this means that most Karoo archaeological sites are open sites containing principally stone artefacts. Ostrich eggshell is sometime preserved and, occasionally, pottery on recent sites, but bone is rarely preserved except in rare, stratified contexts. Sites span the full range from the Early and Middle Stone Ages to the contact period between the Later Stone Age inhabitants of the region and the incoming European colonists within the last two centuries.

Potentially archaeologically sensitive areas in the landscapes like that of the Khoe WEF include:

- Springs, pans and watercourses which were a focus for human activity in the past, and prehistoric and colonial-era archaeological sites may be found around them.
- Outcrops of suitable stone which were quarried for tool making raw material during the Early, Middle and Later Stone Ages.
- Any accessible rock shelter or overhang on the skirts or slopes of hills and mountains. These have the potential to contain rock paintings and/or archaeological deposit.
- Rocky outcrops and boulders (particularly where dolerite is present), which may contain pre-colonial and, in some instances, historical rock engravings.

Evidence from other parts of the South African interior (see for example, Webley & Hart 2010, Van der Walt 2016, Orton 2017, Gribble 2022) indicates that the bulk of archaeological material and sites are in the river valleys. The higher ground like that to be occupied by the much of the Khoe WEF infrastructure is exposed and remote from resources such water, and the presence of archaeological sites and material in such areas is the exception rather than the rule.

### 6.5.1 HISTORICAL BUILT ENVIRONMENT

According to the National Heritage Resources Act, any built structure older than 60 years is historical and enjoys protection under the Act.

Available historical survey diagrams for the farms within the Khoe WEF footprint indicate that their parent farms were well-established by the second half of the 19th century, and it is highly likely that the area had in fact been used and settled by farmers of European descent at least a century before.

The earliest colonial use of this area would have been for seasonal transhumant grazing. This was followed by a formal but still haphazard system of loan farms, where a farmer could rent an area of land, usually centered on a spring or water source, from the authorities at the Cape for a nominal annual fee. After the permanent British occupation of the Cape in the early 19th century, land tenure was formalised into a system of quitrents that resulted in the land divisions in the area that are in place today.

This long temporal span of agricultural use of the land suggests that there will be historical buildings and structures on particularly the older farms portions in the area. A comparison of the earliest 1:50,000 topographic map sheet for the area, which dates from 1969, with modern satellite imagery in a GIS indicates that the farming settlement nodes at Sandvlei (1/38), Sandvlei (11/38), Ou Muur (Farm Re 193) and Eendracht (Re 37) were already established in the 1960s and are thus likely to contain historical structures.

#### 6.5.1.1 GRAVES AND BURIALS

This area has been formally settled by farmers of European descent since at least the mid-19th century, and less formally for longer than that. The historical farm complexes in the WEF area, and potentially also any older, abandoned settlement nodes, can be expected to have cemeteries associated with them, although a review of satellite imagery for this report did not find any clear evidence for such.

Pre-colonial graves could occur almost anywhere in the WEF area, but the remote and mountainous nature of much of the wind energy facility footprint suggests that they are unlikely in those areas. Such burials are seldom marked, except possibly by a cairn of stones, and often occurred in places like riverbanks, where soft sand made burial easy.

#### 6.5.1.2 CULTURAL LANDSCAPE

The area proposed for the Khoe WEF is remote and the landscape is largely natural and with only a light cultural overlay comprised of features - fences, wind pumps, farm roads and occasional farm complexes - which reflect the historical and modern use of the area for agriculture.

In their Inventory and Policy Framework for Heritage and Scenic Resources, Winter and Oberholzer (2013) identified the Rooihogte Pass / Burger's Pass, built by Thomas Bain and dating to 1877, as having "high historical, technological and scenic value". A portion of the pass falls within the southern half of the Khoe WEF footprint. They also define the R318, which is straddled by the Khoe WEF as a "scenic / linking route of secondary importance".

Although the cultural landscape of the Khoe WEF is generally only lightly developed, it does contain a number of identified features of significances, and the construction of the WEF in this landscape will alter its visual character in particular.

## 6.6 PALAEOLOGY

A study conducted for the proposed Ezelsjacht WEF to the north of the Khoe WEF, indicate that the proposed Khoe WEF is underlain by several coastal to shallow marine formations of the Table Mountain and Bokkeveld Groups of the Cape Supergroup, of Early to Middle Devonian age (c. 410 – 390 Ma). It was during this period that the first terrestrial plants, bony fish and insects evolved and spread on the land, from precursors in the seas.

Although southern Africa, then located in the middle of Gondwanaland, was positioned over or close to the South Pole and was covered by a series of ice sheets (Visser, 1989; Isbell et al., 2012), some of the fine-grained shallow water and marginal mudstones and siltstones have fossils preserved within them (Plumstead, 1969; Theron, 1972; MacRae, 1999; Thamm and Johnson, 2006; Penn-Clarke et al., 2018). With the repeated cycles of sea level rise and fall and resulting shifts from marine to shoreline to fluvial and delta settings and back again, there is a complex series of environments with the resident faunas.

The Ordovician lower Table Mountain Group preserves trace fossils, and invertebrates such as brachiopods, trilobites, eurypterids, conodonts and chitinozoans. There are records of invertebrate fossils, known as the Malvinokaffric Faunal Assemblage, in the Silurian – early Devonian upper Nardouw Subgroup and the whole of the Bokkeveld Group, while the Witteberg Group has records of fish and plants as well as invertebrates such as brachiopods, bivalves, gastropods and trilobites. More recent research has shown that the Malvinokaffric fauna of Gondwanaland (Bokkeveld Group) is somewhat different from the northern hemisphere fauna (Penn-Clarke et al., 2018b).

The Ceres Subgroup has abundant marine benthic (bottom-dwelling) invertebrate fossils such as brachiopods, bivalves, trilobites, cephalopods, crinoids, ophiuroids, hyoliths, cricoconarids, corals and gastropods (Hiller and Theron, 1988; Theron and Johnson, 1991; Thamm and Johnson et al., 2006; Penn-Clarke et al., 2018a). These marine fossils occur mostly in the mudrock units while plant fossils occur in the sandstone units. Some units also show extensive bioturbation based on the presence of trace fossils of burrows, such as *Planolites*, *Skolithos* and *Arenicolites*.

The assessment for the Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual palaeontological sensitivity of that project area is much lower than indicated on the SAHRA map. According to Almond (2022), none of the fossil sites he recorded in the Ezelsjacht WEF area were very well preserved and all represent common, widely distributed forms, of limited scientific or conservation value.

## 6.7 VISUAL/ LANDSCAPE

The proposed Khoe WEF and associated infrastructure is located approximately 29 km south west of the town of Touws River, 20 km south east from De Doorns and 35 km west of Worcester within the Langeberg Local Municipality within the Western Cape Province.

The study area occurs on land that ranges in elevation from approximately 200 metres above sea level (m asl) in the south west at the base of the Langberg Mountain along drainage lines and in the west along the Hex River to 1,800m asl on the tops of mountain ranges such as Kwadousberg and Langberg. The site itself is located on land with an average elevation of 1,500m asl. Numerous mountain ranges are located within the study area, namely the Hexrivierberge and Kwadousberg in the west, Langberg to the south, Waboosberge to the

south east and Bontberg to the north. Prominent water sources within the study area include the Nuy, Vink, Keisie, Hex Rivers. The Smalblaar and Bok rivers flow into the Verkeerdevlei Dam in the north.

There are three protected areas within the study area, namely the Cape Floral Region Protected Area, Touw Local Nature Reserve and Drie Kuilen Private Nature Reserve which is located approximately 3 km east of the proposed site. The Cape Floral Region is also a World Heritage Site as recognized by UNESCO. Drie Kuilen PNR offers a variety of activities such as game drives, hikes and overnight accommodation.

Numerous non-designated private natures reserves and guest farms are also located within the study area, namely Aquila Private Nature Reserve to the north, Middelberg guest farm, Leeuwenboschfontein guest farm, Porcupine Peak guest farm and the proposed Exemia Private Game Reserve can be found near the centre of the study area. All of these reserves and farms offer tourist accommodation facilities and activities.

It should be noted that while there are existing buildings on the proposed Exemia, the future intent for the property is to develop it into an ecotourism destination consisting of amongst others, a campsite, healing room, wedding venue and other accommodation offerings.

The greater environment with its wide open, undeveloped landscapes is considered to have a high visual quality.

This study area is known as a tourist destination owing to its location within the Cape Winelands, the Cape Floral Region, and the town of Touws Rivier which is located on the Flowers Route. Five tourist accommodation establishments are located approximately 5 km of the proposed WEF, namely, Middelberg Guest Farm, Ezelsjacht Guest Farm, Kamagu Safari Lodge, Matroosberg Stasie and Ratelbosch.

#### **Less than 5km from the wind turbines:**

- Soutrivier (Ezelsjacht guest farm)<sup>42</sup>
- Middelberg Guest Farm (including the camping site, koshuis and Middelberg Self Catering)
- Sandvlei guest farm
- Porcupine Peak guest farm and cottages
- Oumur
- Proposed Exemia Private Nature Reserve - The information was provided by the adjacent landowner, and no development has occurred yet. There are currently no concrete plans for the proposed game reserve.
- Leeuwenboschfontein guest farm
- Kango guest house
- Various including Die Vlei and Hoenderverdors
- Leeuhok
- Drie Kuilen Privte Nature Reserve
- Unknown homesteads
- Observers travelling along the R318 arterial/main road and Nougaspoort Secondary Road

#### **Located within a 5 - 10km radius:**

- Bloekom Huisie
- Leeuwenboschfontein guest farm and potentially the observatory
- Perdefontein

<sup>42</sup> Facilities listed in parenthesis indicate the location of this specific sensitive receptors on other proposed renewable energy facility development sites within the study area. This includes facilities that are already authorized and ones where authorization is still in process.

- Doringkloof
- Pietersfontein (Amani Lodge)
- Riethoek
- Protea Farm
- Koo incl various residences Langdam, Jakkalsvlei guest farms
- Heinzberg
- Various unknown homesteads
- Observers travelling along the R318 arterial/main road

**Located within a 10 - 20km radius:**

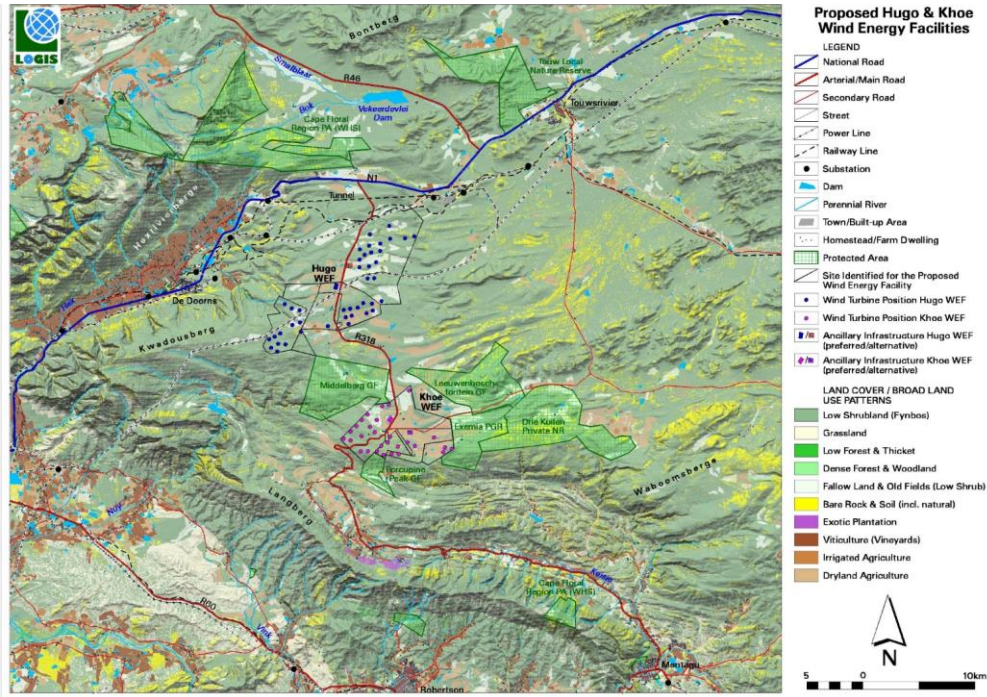
- Keerom
- Hoekfontein
- Nauga
- Brakputs
- Gecko Rock private nature reserve
- Brakrivier
- Patatsfontein
- Protea Farm- Populierbos
- Unknown homestead
- Cape Floral Region Protected Area (WHS)
- Observers travelling along the N1 National Road, the R318 and various secondary roads

**Located beyond 20km:**

- Karoo 1 Hotel Village and Africamps
- Vredefort
- Spes Bona
- Merweda
- Vleitjie
- Njalo Njalo Safari
- De Bron
- Excelsior
- Baden
- Bon Accord Cottages
- Kruis
- Knipes Hope
- Scheepersdraai
- Dederheuwel
- Unknown Homesteads



FIGURE 6-15 LAND COVER AND BROAD LAND USE PATTERNS WITHIN THE STUDY AREA



## 6.8 TRAFFIC AND TRANSPORTATION

The hierarchy of the road network in the immediate vicinity of the development site is shown in Appendix C – Existing Surrounding Road Network and summarised below.

- **R318:** R318 is a Class 3 Provincial Main Road (MR00295) that runs in the north-south direction from the N1 near De Doorns through Montagu to R60 near Ashton. The R318 road passes through the Hex River Valley, which is known for its vineyards, fruit farms, and scenic views. The R318 road has a general posted speed limit of 100 km/h and connects to the R62 road, which is a popular tourist route that links Cape Town and Port Elizabeth. The length of R318 in kilometres is 77.4km (Start: Jct N1 De Doorns, End: Montagu);
- **Road OP05748:** Road OP05748 is a Class 5 Provincial Minor Road (gravel access road) which is located to the west of Main Road R318 (MR00295). The length of OP05748 in kilometres is 7.42 km (Start: Jct MR295 on Zout Riviers Berg, End: Property 171 Ezeljagt & 7 De B);
- **Road OP05964:** Road OP05964 is a Class 5 Provincial Minor Road (gravel access road) which is located to the east of Main Road R318 (MR00295). The length of OP05964 in kilometres is 7.55 km (Start: Jct MR295 on Eendragt 38, End: Jct DR1248 on De Braak 7);
- **Road DR01428:** Road DR01428 is a Class 4 Provincial Divisional Road (gravel road) which runs in the east west direction to the east of Main Road R318 (MR00295). The length of Road DR01428 in kilometres is 19.5 km (Start: Jct MR295 Sandvlei, End: Jct DR1411 Nougaspoort);
- **Road OP05963:** Road OP05963 is a Class 5 Provincial Minor Road (gravel access road), which is located to the south of Road DR01428. The length of OP05963 in kilometres is 6.48 km (Start: Jct DR1428 Eendragt 37, End: Lopenderivier); and
- **Road OP05962:** Road OP05962 is a Class 4 Provincial Minor Road (gravel road) which is located to the west of Main Road R318 (MR00295). The length of OP05962 in kilometres is 11.95 km (Start: Jct MR295 Rooihoogste Pass, End: Keerom Boundary Witwater).

The site location and layout are such that two primary roads potentially provide access to the proposed Khoe WEF development being the Main Road R318 (MR00295) and Divisional Road DR01428. Thus, the proposed locations of providing main access to the development are from the existing intersections and accesses off Main Road R318 (MR00295).

Positions of 8 proposed accesses to the site off Main Road R318 (MR00295) are shown in Figure 6-16 comprises of 5 existing farm accesses with 3 new access locations (1,2 and 3) which connect to new internal roads providing access to the associated WEF facility infrastructure located to the west and east of Main Road R318 (MR00295).

FIGURE 6-16 PROPOSED ACCESS LOCATIONS



To understand the effects of additional traffic on the road network, an understanding of existing road network traffic conditions is required. Thus 12-hour manual classified traffic counts were conducted at four (4) key intersection. These traffic counts were carried on Monday, 15 April 2024 between 06h00-18h00.

The volume of traffic on the Main Road R318 is relatively low compared to traffic volumes along the N1 National Road. Similarly, all other roads (Road DR01442, Road OP05749 and Road OP05748) carry significantly very low levels of traffic volumes compared to both Main Road R318 and the N1 National Road.

Traffic flow diagrams representing the 2024 existing traffic count data (total vehicles) are shown in Appendix E – Existing Traffic for the weekday AM peak hour, PM peak hour and 12-hour periods. Observed AM and PM peak hour volumes are summarized below:

- **N1 National Road:** 300 vehicles per hour and 366 vehicles per hour were recorded during the AM peak hour and PM peak hour, respectively, including 56 and 99 heavy vehicles during the respective peak hours.
- **Main Road R318 (MR00295):** 15 vehicles were recorded during the AM peak hour and 8 vehicles were recorded during the PM peak hour. Only 2 heavy vehicles were recorded during the AM peak hours and 0 in the PM peak hour.
- **Road DR01442:** A total of 4 vehicles including heavy vehicles were recorded during the AM peak hour and none during the PM peak hour.
- **Road OP05749:** A single vehicle was recorded in the AM peak hour and none in the PM peak hour.
- **Road OP05748:** There were no vehicles observed during peak periods on Road OP05748
- **Road DR1428:** A very low traffic volume of 6 vehicles were recorded in the AM peak hour with no vehicles recorded in the PM peak hour.

- **Road OP05962:** There were no vehicles observed during peak periods on Road OP05962.

## 7. ASSESSMENT OF THE ALTERNATIVE

In accordance with the requirements of Appendix 1 of the 2014 EIA Regulations (as amended), an assessment report must contain consideration of all alternatives, which can include activity alternatives, site alternatives, location alternatives and the “No Development” alternative. At a minimum, this chapter must address:

- The consideration of the No Development alternative as a baseline scenario;
- A comparison of reasonable and feasible selected alternatives; and
- The provision of reasons for the elimination of an alternative.

Alternatives are required to be assessed in terms of social, biophysical, economic and technical factors.

When assessing alternatives, they should be “practical”, “feasible”, “relevant”, “reasonable” and “viable”, and that I&APs should be provided with an opportunity to provide input into the process of formulating alternatives. In this instance, this chapter provides an overview of the alternatives that have been considered for this development.

### 7.1 THE NO DEVELOPMENT SCENARIO OR “NO-GO” OPTION

This scenario assumes that the proposed development does not proceed. It is equivalent to the future baseline scenario in the absence of the proposed development. Relative to the proposed development, the implications of this scenario include:

- The land-use remains agricultural, with no further benefits derived from the implementation of a complementary land use;
- There is no change to the current landscape or environmental baseline;
- No additional electricity will be generated on-site or supplied through means of renewable energy resources. This would have negative implications for the South African government in achieving its proposed renewable energy target, given the need for increased generation;
- There would be a lost opportunity for South Africa to generate renewable energy. This would represent a significant negative social cost;
- There is no opportunity for additional employment (permanent or temporary) in the local area where job creation is identified as a key priority; and
- The national and local economic benefits associated with the proposed project’s REIPPPP commitments and broader benefits would not be realised.

The purpose of the proposed development is to generate renewable electricity and export this to the national grid. Other socio-economic and environmental benefits will result from the proposed development such as:

- Reduced air pollution emissions - burning fossil fuels generates CO<sub>2</sub> emissions, which contributes to global warming. Emissions of sulphureous and nitrous oxides are produced, which are hazardous to human health and impact on ecosystem stability.
- Water resource saving – conventional coal-fired power stations use large quantities of water during their cooling processes. WEFs require limited amounts of water during construction and a minimal amount of water during operation. As a water stressed country, South Africa needs to be conserving such resources wherever possible.

- Improved energy security – renewables can be deployed in a decentralised way close to consumers, improving grid strength while reducing expensive transmission and distribution losses. Renewable energy projects contribute to a diverse energy portfolio.
- Exploit significant natural renewable energy resources – biomass, solar and wind resources remain largely unexploited.
- Sustainable energy solutions – the uptake of renewable energy technology addresses the country's energy needs, generation of electricity to meet growing demands in a manner which is sustainable for future generations.
- Employment creation and other local economic benefits associated with support for a new industry in the South African economy.

The development compliments agriculture by providing an additional income source, without excluding agriculture from the land, or decreasing production. Therefore, the negative agricultural impact of the no-go alternative is more significant than that of the development, and so, purely from an agricultural impact perspective, the proposed development is the preferred alternative between the development and the no-go.

If the project were not implemented, then the site would stay as it currently is and likely continue to degrade due to the prevalence of grazing and or erosion within the water courses. This would continue into the long-term with a Low intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and their requirement for grazing areas, coupled to the need access. Many fauna species are to some degree negatively affected by farming including many predators which are targeted due to their negative impact on livestock, while some species may also be vulnerable to habitat loss or degradation and may experience depressed populations within the farming landscape. In terms of vegetation and plant species, extensive grazing may result in changes in composition towards less palatable species and a reduction in plant cover. It is however important to recognise that the development does not represent an alternative to extensive livestock farming, but rather an additional impact and stressor independent of the current land use. Overall, the no-go alternative is considered to result in a low negative impact on terrestrial biodiversity.

Although the proposed development will likely affect the avifaunal community on site, they do not appear to have pushed key species towards extinction in most cases. Furthermore, existing impacts to birds, such as agrochemical poisoning (accidental), fence entanglement, road kill, power line electrocution and collision, disturbance of breeding, subsistence hunting, snaring and others, would not be replaced by the proposed project, they would all still persist in addition to the new impacts associated with the wind farm. The No-Go alternative therefore has much lower impacts on avifauna than the proposed project, and would be preferred from an avifaunal perspective. However, since the No-go constraints/buffers have already been taken into account, and with the recommended mitigation measures implemented going forward, the preference for developing the project is also acceptable.

The primary goal of the project is to assist in providing additional capacity to Eskom to assist in addressing the current energy supply constraints. The 'No Development' alternative would not assist the government in addressing climate change, energy security and economic development. Addressing climate change is one of the benefits associated with the implementation of this proposed development. Climate change is widely considered by environmental professionals as one of the single largest threats to the environment on a local,



national and global scale. Energy supply constraints and the associated load shedding have had a significant impact on the economic development of the South African economy. South Africa also relies on coal-powered energy to meet more than 90% of its energy needs. South Africa is therefore one of the highest per capita producers of carbon emissions in the world and Eskom, as an energy utility, has been identified as the world's second largest producer carbon emissions.

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 significant negative social cost.

**Based on the above, the 'No Development' alternative is not a preferred alternative.**

## 7.2 SITE SELECTION

The Applicant identified the Khoe WEF after conducting a series of pre-feasibility assessments by considering aspects such as climatic conditions (wind speed databases, pre-dominant wind directions), grid connection scenarios, site geography and topography, ecological feature, social environment and site accessibility.

Feasibility studies undertaken by the Project Applicant indicated that the Khoe WEF site is suitable to develop and operate a wind farm as it satisfies the following criteria:

- Feasibility of access for wind turbine delivery as the site is easily accessible from the national road network;
- Viable wind resource;
- The surrounding area is not densely populated;
- The proposed site is largely previously transformed agricultural land and current land use is grazing;
- Willingness of landowner to host a wind farm on their property; and
- No environmental fatal flaws identified in the screening assessment.

The unique features of this site eliminates the possibility of alternatives with similar site conditions. Alternatives are restricted to on-site aspects such as turbine footprints and layouts, roads, and related infrastructure options.

**Although the site is considered fatally flawed from visual aspect, the no development scenario would represent a lost for South Africa to improve energy security.**

**According to all other specialist studies undertaken, the site is suitable for the construction and operation of the WEF.**

## 7.3 DESIGN EVOLUTION ALTERNATIVES

Following the selection of a suitable site, consideration is given to the design of the WEF. It is important that wind turbines are sited in the optimum position to maximise the wind energy yield whilst minimising E&S impacts as far as possible.

Information collated during the scoping phase was used to inform the design of the preliminary WEF and associated infrastructure layout progressively. This approach was adopted with respect to this proposed development, and where potentially significant impacts were

identified, efforts were made to avoid these through evolving the design of the proposed development. Best practice advises that the EIA should be an iterative process rather than a post design environmental appraisal. In this way, the findings of the technical environmental studies were used to inform the design for EA of a development.

Various wind turbine designs and layouts were considered for the site in order to maximise the electricity generation capacity and efficiency, whilst taking into account environmental constraints.

During the scoping phase, 38 turbine locations, and two laydown and on-site substation alternative were provided to the specialists. This layout has been adjusted, based on the initial scoping assessment and specialists' findings. Due to the design evolution of the Khoe WEF turbine positions have been revisited. A design evolution summary report is presented in Appendix C of this EIA Report.

The layout of 29 turbines was presented and assessed in full detail during this EIA phase is considered the 'preferred layout' for Khoe WEF development.

## 7.4 BESS ALTERNATIVES

Unlike conventional energy storage facilities, such as pumped hydro, a BESS has the advantage of being flexible in terms of site location and sizing. Therefore, they can be incorporated into, and placed in close proximity, to a wind or solar facility. They also have the advantage of being easily scaled and designed to meet specific demands.

The function of the BESS will be to store peak kinetic energy produced by the proposed Khoe WEF for use in the following ways:

- To power the operation of the development when the national grid is strained by high (or peak) demand, often resulting in load-shedding.
- To provide excess generation to the national grid which will assist with stabilizing electricity supply during peaks and troughs of demand.
- To reduce the impact caused by the variability and limited predictability of wind generation.

The preferred battery technology being considered would be Solid-State, Lithium Ion (Li-Ion) batteries, which consists of multiple battery cells that are assembled together to form module. With rapid developments in battery technology globally, the EAP has undertaken a high-level desktop study of the BESS. The battery technology under consideration is explained further below, and compared in a table of advantages and disadvantages.

### 7.4.1 THE NEMA AND BESS

Although international BESS standards are currently being updated, current BESS regulations in South Africa are mostly written for backup power (uninterrupted power supply) applications.

Battery storage does not trigger any listed activities relating to the generation of electricity as technology does not 'generate' electricity, it simply stores electricity generated by a renewable energy facility (proposed Khoe WEF in this instance) and discharges the stored electricity as and when required by the grid. Furthermore:

- A battery is not deemed to be a container; and
- Electrolytes that are used within battery storage facilities: their function is deemed to be like transformers within substations: converting high voltage electricity to lower voltage

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electricity for further distribution. The function of the battery is not for “storage” or “storage and handling” of a dangerous good.

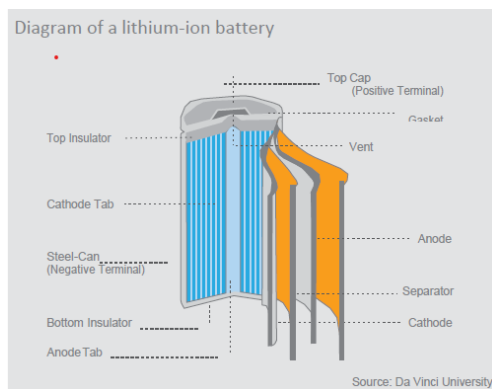
#### 7.4.2 BESS TECHNOLOGY CONSIDERED

Typically, a BESS consist of multiple battery cells that are assembled together to form modules. Each cell contains a positive electrode, a negative electrode and an electrolyte. A module may consist of thousands of cells working in conjunction. The preferred location of the BESS has been considered and assessed by the specialists, and the ancillary (or associated) infrastructure will include (but not limited to):

- a battery room;
- inverters;
- switch gear room; and
- Supervisory Control and Data Acquisition (SCADA) equipment.

Preferred Technology - Lithium ion (Li-ion) batteries are the most common stationary battery in the market today. Simply put, the batteries consist of a graphite electrode and a lithium-based electrode immersed in a liquid. When the battery is in use, charged lithium atoms ions flow from the graphite electrode to the lithium-based electrode through the liquid, and that flow of charged particles is what generates electricity. When the battery is recharged the flow is reversed, sending the lithium ions back to the graphite anode where they are stored ready for discharge.

FIGURE 7-1 DIAGRAM OF LITHIUM-ION BATTERY

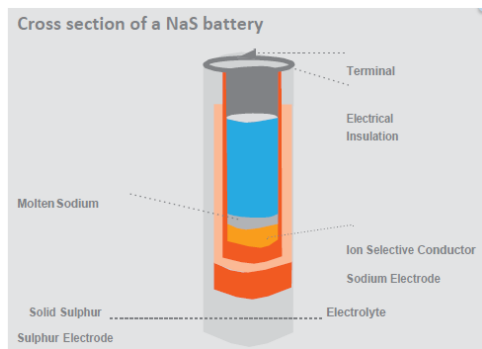


Solid State Battery is an acceptable solution to assist with reducing the fire risk Li-ion batteries pose. Unlike Li-Ion Batteries, Solid State Batteries have an ionic liquid made up of non-flammable molten salts with low melting points i.e. the electrolyte is considered a solid. Compared to Li-ion batteries with liquid electrolytes, SSBs offer an attractive option owing to their potential in improving safety and achieving both higher power and high energy densities. The trade-off with this type of battery is that electrically charged atoms do not move as freely and easily through a solid as they do through a liquid, so thus making them less efficient at generating electricity.

A sodium sulphur (NaS) battery is a molten state battery constructed from sodium (Na) and sulphur (S). The battery casing is the positive electrode while the molten core is the negative electrode. The battery operates at high temperatures of between 300-350 degrees Celsius (°C),

while lower temperature versions are under development. In charging, the sodium ions are transported through the ion selective conductor to the anode reservoir. Discharge is the reverse of this process. Since sodium ions move easily across the ion selective conductor, electrons cannot, therefore there is no self-discharge. When not in use the batteries are typically left under charge so that they will remain molten and be ready for use when needed. If shut down and allowed to solidify, a reheating process is initiated before the batteries can be used again.

FIGURE 7-2 DIAGRAM OF A SODIUM-SULPHUR BATTERY



Flow Batteries consist of two tanks of liquids that feed into electrochemical cells. The main difference between flow and conventional batteries is that flow batteries store the electricity in the liquid rather than in the electrodes. They're far more stable than Li-ion, they have longer lifespans, and the liquids are less flammable. Not only that, but a flow battery can be scaled up by simply building bigger tanks for the liquids. The most widely known and used flow battery is vanadium flow battery.

Table 7-1 describes the most widely used technologies available in the market, and the most feasible technology for large utilities projects. It must be noted that the technology is constantly changing and evolving and as such the Applicant would utilise the best possible technology available at the time of placement.

TABLE 7-1 THE TECHNOLOGY OPTIONS FOR THE BESS

Activity Alternative	Advantage	Disadvantage
<p><b>Preferred Technology: Li-Ion Batteries<sup>43</sup></b></p>	<ul style="list-style-type: none"> <li>Lithium ion has the smallest installation footprint when compared to the technologies for the similar energy capacity.</li> <li>Li-ion batteries are able to tolerate more discharge cycles than other technologies.</li> <li>High efficiency.</li> <li>Produce the highest voltage compared to other batteries by driving high electron flow.</li> </ul>	<ul style="list-style-type: none"> <li>Negative effects of overcharging / over discharging.</li> <li>Volatility leading to Fire and Explosions.</li> <li>Potential for issues associated with overheating (Certain Lithium chemistry's).</li> <li>The Lithium element in this technology is considered hazardous / dangerous goods.</li> <li>Lithium is a finite resource with concerns of its availability in the long term.</li> </ul>

<sup>43</sup>Li-Ion Battery: <https://ensia.com/features/battery-innovations-renewable-energy/>

Activity Alternative	Advantage	Disadvantage
Solid State Battery <sup>44</sup>	<ul style="list-style-type: none"> <li>• Potential to substitute Lithium for another electrode material.</li> <li>• Marked improvement in safety at cell and battery levels: solid electrolytes are non-flammable when heated, unlike their liquid counterparts.</li> <li>• It permits the use of innovative, high-voltage high-capacity materials, enabling denser, lighter batteries with better shelf-life as a result of reduced self-discharge.</li> <li>• Simplified mechanics as well as thermal and safety management.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced conductivity.</li> <li>• Sourcing of a suitable electrolyte.</li> <li>• Not as well researched and widely accepted as Li-Ion batteries.</li> <li>• Narrow temperature range and cannot tolerate varying temperature.</li> </ul>
NaS Batteries <sup>45</sup>	<ul style="list-style-type: none"> <li>• Long life cycle.</li> <li>• Able to tolerate a high number of charge/discharge cycles.</li> <li>• ability to discharge fully with no effects to the performance.</li> </ul>	<ul style="list-style-type: none"> <li>• Low energy to size ratio.</li> <li>• Heating may be required.</li> <li>• Potential safety issues with the molten sodium.</li> <li>• Has the potential to catch on fire.</li> </ul>
Flow Batteries <sup>46</sup>	<ul style="list-style-type: none"> <li>• More stable than Li-Ion battery.</li> <li>• Are known to have the longest lifespan.</li> <li>• Less flammable liquids.</li> <li>• Technology is scalable for large grid infrastructure and renewable energy project.</li> </ul>	<ul style="list-style-type: none"> <li>• The liquids can be costly, so there's a greater up-front cost for the batteries.</li> <li>• Not as efficient as Li-Ion Battery.</li> </ul>

## 7.5 TECHNOLOGY ALTERNATIVES

Alternative renewable energy technologies include hydro-electric power, photovoltaic solar or concentrated solar power. The site itself has no resource for hydro-electricity and a solar electricity generation would require a much greater infrastructure footprint and water consumption (for cleaning panels) to generate the equivalent energy of the proposed WEF. The question if wind energy technology is the best technology for the proposed location was answered as part of the Need and Desirability assessment (Section 5).

Wind energy presents less of an impact on the continued use of the land for grazing, as it does not result in the shading that occurs from solar facilities which affects vegetation and consequently farming practices. Whilst there are potential impacts associated with wind energy which are not associated with solar, such as collision risk with avifauna, there are different

<sup>44</sup> Solid State Battery: <https://www.greentechmedia.com/articles/read/us-storage-companies-quietly-grow-bets-on-solid-state-batteries>

<sup>45</sup> Li-Ion Battery and Na-S Battery: <https://ensia.com/features/battery-innovations-renewable-energy/>

<sup>46</sup> Flow Battery: <https://newatlas.com/energy/iron-aqds-flow-battery-usc/>

potential impacts for solar facilities such as loss of habitat and foraging areas for avifauna and other ecological receptors.

Based on the site's physical characteristics and existing land uses, the wind energy technology is best suited to the site.

## 8. THE PREFERRED ALTERNATIVE

The proposed Khoe WEF is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

The Khoe WEF project site is proposed to accommodate infrastructure (as detailed below), which will enable the WEF to supply a contracted capacity of up to 232 MW. The development footprint of the site will be up to 85 ha, dependent on the sensitivities in the area. The proposed development will comprise of the following infrastructure:

- Up to 29 wind turbines with a maximum tip height of up to 250 m and a rotor diameter of up to 200 m.
- Each turbine will have a capacity of up to 8 MW
- A transformer at the base of each turbine.
- Concrete turbine foundations approximately up to 1,000 m<sup>2</sup> per turbine
- Each turbine will have a hardstand area of approximately up to 7,500 m<sup>2</sup> per turbine
- Temporary laydown areas (with a footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area.
- BESS (with a footprint of up to approximately 5 ha).
- Cabling between the turbines, to be laid underground where practical.
- One on-site substations of up to 2.5 ha in extent to facilitate the connection between the WEF and the electricity grid.
- Access roads to the site and between project components inclusive of stormwater infrastructure. A 13.5 m road corridor may be temporarily impacted upon during construction and rehabilitated to 8m wide after construction.
- A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha).
- Operation and Maintenance (O&M) buildings (with a combined footprint of up to 1 ha) including a gate house, security building, control centre, offices, warehouses, a workshop and visitor's centre.

The project is expected to have a 20-25-year life span, but with possible refurbishment this could be extended if deemed feasible at the time.

### 8.1 WIND TURBINE GENERATORS AND HARDSTAND AREAS

The proposed Khoe WEF will comprise up to 29 turbines (each turbine with an approximate capacity of 8 MW) with a maximum output capacity of up to 232 MW with an anticipated lifespan of 20-25 years.

The turbines will be three-bladed horizontal-axis design with a WTG hub height from ground level is anticipated to be up to 150 m, with a blade length and rotor diameter of up to 100 m and 200 m respectively. The height of the complete structure is approximately up to 250 m. The exact turbine model has not yet been selected and will be identified based on the wind resource distribution, technical, commercial and site-specific considerations.

The proposed turbine development footprint and associated facility infrastructure will cover an area of up to 100 ha depending on the final design. The aerial extent of the total area is 7,900 ha.

Each turbine will require a transformer that will be located within the turbine tower. Each turbine will have a circular foundation which will be placed alongside the hardstand, resulting in that area being permanently disturbed by the turbine foundation. The dimensions of the turbines provided in this report are preliminary and will be finalized at a later stage of the Project.

The precise location of the turbines within the WEF site has been finalised and confirmed during the EIA process, following the assessment of technical and environmental constraints. Figure 8-1 to Figure 8-4 indicate a typical wind energy operation sequence as well as the different components of a wind turbine.

FIGURE 8-1 AN ILLUSTRATION OF TYPICAL COMPONENTS OF A WTG

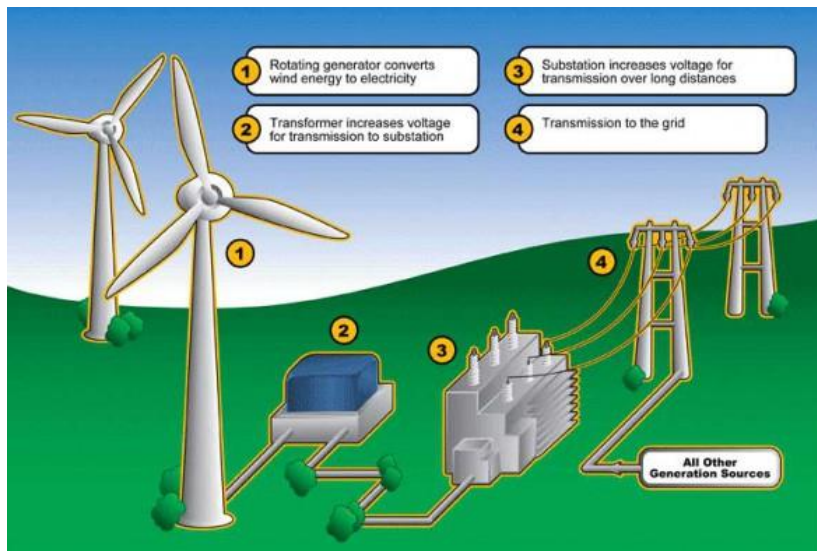


FIGURE 8-2 THE INSIDE OPERATION OF A TYPICAL WIND TURBINE



FIGURE 8-3 THE INSIDE OPERATION OF A TYPICAL WIND TURBINE

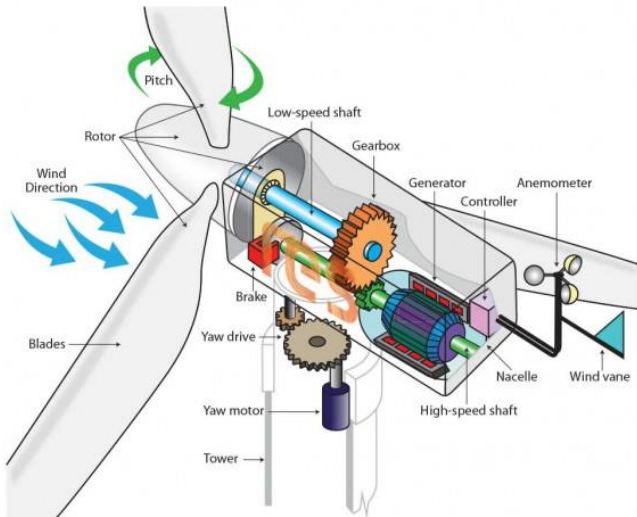


FIGURE 8-4 ILLUSTRATION OF A TYPICAL TURBINE HARDSTAND AND LAYDOWN AREA



## 8.2 ELECTRICAL CABLING AND ON-SITE SUBSTATION

It is proposed that an on-site substation with a capacity up to 132 kV with an up to 33 kV overhead / underground powerline will be installed. It is unknown at this stage how long the connection to the grid will be, or what route the cabling will be installed. Due to the complexity related to the routing of the transmission line, it will not form a part of this application. The intention is for the internal project cabling to follow the road network to the on-site facility substation.

The on-site substation is expected to have a footprint of 2.5 ha. It will be used to facilitate the connection to the national grid. The turbines will be connected to the on-site substation using an underground cabling network with a capacity of up to 33kV.

## 8.3 BATTERY ENERGY STORAGE SYSTEM

The BESS is expected to have a total footprint of approximately 5 ha. The function of the BESS will be to store peak kinetic energy produced by the Khoe WEF for use in the following ways:

- To power the operation of the proposed development when the national grid is strained by high (or peak) demand, often resulting in load-shedding.
- To provide excess generation to the national grid which will assist with stabilizing electricity supply during peaks and troughs of demand.
- To reduce the impact caused by the variability and limited predictability of wind generation.

The preferred battery technology being considered would be Solid-State, Lithium Ion (Li-Ion) batteries, which consists of multiple battery cells that are assembled to form module. Each cell contains a positive electrode, a negative electrode and an electrolyte. A module may consist of thousands of cells working in conjunction. Modules are normally packaged inside containers (like shipping containers) and these containers are delivered pre-assembled to the project site.

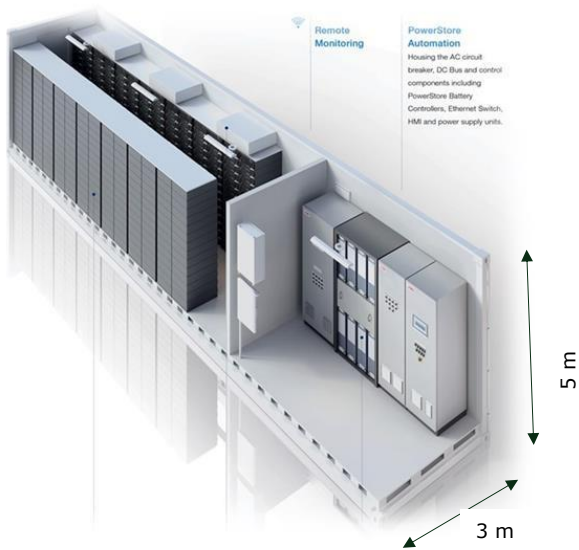
The containers will have approximate dimension ranges of: height 5 m, width 3 m, length 20 m. The containers are raised slightly off the ground and are banded to prevent possible environmental damage resulting from any equipment malfunction. The proposed development is considering the option of stacking these containers vertically to a maximum of two container layers or a height of up to 10 m.



The BESS storage capacity has not been finalized at this point. The BESS will be placed on a concrete footprint of up to 5 ha. The BESS will be near the on-site substation, will be fenced off and will be linked to the substation via internal cables and will not have any additional office / operation / maintenance infrastructure as those of the substation.

The following figures are examples of BESS in other facilities for ease of reference. This proposed development will have similar project components and will be designed in a similar manner.

**FIGURE 8-5 TYPICAL REPRESENTATION OF HOW BATTERIES AND BATTERY MODULES ARE HOUSED AND ASSEMBLED**



**FIGURE 8-6 SOLARCITY'S TESLA BATTERY STORAGE FACILITY, HAWAII**



**FIGURE 8-7 A STOCK IMAGE OF A SIMILAR DEVELOPMENT WITH AN ON-SITE SUBSTATION AND BESS**



#### 8.4 LAYDOWN AREAS AND SITE OFFICES

Individual turbine temporary laydown areas including crane boom laydown areas, blade laydown areas and other potential temporary areas will be up to a maximum of 6 ha. The temporary warehouse and site camp establishment, as well as the concrete batching plants will have a footprint of up to 2 ha. As such, the footprint of the construction laydown area will be up to 8 ha in aerial extent.

#### 8.5 INTERNAL SITE ACCESS ROADS

Permanent roads will be up to 4.5 m wide, with a servitude of up to 13.5 m, which includes additional space required for cut and fill, side drains and other stormwater control measures. Furthermore, the servitude will be used as 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 on-site substation hub (which includes substation infrastructure, BESS and Balance of Plant area). All roads may have underground cables running next to them. The 13.5 m wide road servitude will be temporarily impacted during construction and rehabilitated to 4.5 m wide after construction.

## 8.6 SERVICE PROVISION

### 8.6.1 HEALTH AND SAFETY

The IFC guidelines for Health and Safety are based on the Occupational Health and Safety Act (OHSA) of America and are subsequently aligned with South African legislation (OHS Act no 85 of 1993). It is understood that the project infrastructure and equipment will be designed to good industry standards to minimise risks personnel working at the proposed development site.

FE Hugo & Khoe (Pty) Ltd will institute a Health and Safety (H&S) Plan prior to construction, for all persons working at the proposed development site. The policy will need to evaluate the risks and impacts to the health and safety of the affected community during the design, construction and operation of the proposed development, and establish preventive measures to address them in a manner commensurate with the identified risks and impacts within this assessment. Such measures need to adhere to the precautionary principle for the prevention or avoidance of risks and impacts over minimization and reduction.

### 8.6.2 WATER REQUIREMENTS

Water will be sourced from either the Local Municipality, supplied from a contractor and trucked in, from existing boreholes located within the application site or from a new licensed borehole (if feasible) if none of these options are available. Note, however, that should municipal water supply not be confirmed, the Applicant will investigate other water sources considering any necessary and relevant legal requirements.

High water use is only anticipated during the first twelve months of the construction phase mainly for purposes of the turbine foundations, roads and dust suppression. Thereafter the water usage will decrease drastically. The anticipated water usage for the proposed development for the duration of the construction phase includes the following:

- Drinking;
- Ablution facilities;
- Access Road construction;
- Dust suppression;
- Fire-fighting reserve;
- Cleaning of facilities; and
- Construction of foundations for the WEF infrastructure, i.e., turbines and substation, etc.

The water use requirement during the operational phase will be primarily for human consumption and sanitation purposes.

### 8.6.3 STORMWATER MANAGEMENT

Stormwater drainage systems will be constructed and kept separate from the sewerage effluent system on site to ensure that stormwater run-off from site is appropriately managed. Water from these systems is not likely to contain any chemicals or hazardous substances and will be released into the surrounding environment based on the natural drainage contours.

Wastewater and sludge will be managed by local authorities and service providers. All wastewater will be handled in accordance with the Guidelines for the Utilisation and Disposal of Wastewater Sludge Volumes 1 to 6 (Herselmann & Snyman, 2006).

A project specific stormwater management plan will need to be produced and appended to the EMPr (Appendix B) for implementation.

#### 8.6.4 WASTE MANAGEMENT

During the construction phase, it is estimated that the Khoe WEF would generate solid waste which includes (but is not limited to) packaging material, building rubble, discarded bricks, wood, concrete, plant debris and domestic waste. Solid waste will be collected and temporarily stockpiled within designated areas on site during construction, and thereafter removed and disposed of at a nearby registered waste disposal facility on a regular basis as per agreement with the local municipality. Where possible, recycling and re-use of materials will be encouraged.

During the operational phase, the WEF will typically produce minor quantities of general non-hazardous waste mainly resulting from the O&M and office areas. General waste will be collected and temporarily stockpiled in skips in a designated area on site and thereafter removed and disposed of at a nearby registered waste disposal facility (or registered landfill) on a regular basis as per agreement with the local municipality. Where possible, recycling and re-use of materials will be encouraged.

The development of the wind energy facility will include the construction and operation of facilities and infrastructure for the storage and handling of dangerous goods (combustible and flammable liquids, such as oils, lubricants, solvents associated with the facility, and facility substation) where such storage will occur inside containers with a combined capacity exceeding 80 cubic meters but not exceeding 500 cubic meters.

Any hazardous waste such as chemicals or contaminated soil as a result of spillages, which may be generated during the construction and operational phases, will be temporarily stockpiled within a designated area on site and thereafter removed off site by a suitable service provider for safe disposal at a registered hazardous waste disposal facility.

It must be noted that waste handling is not yet confirmed and is to be confirmed at a later stage through municipal or private channels. Similarly, the volumes of waste to be generated during construction and operation phases cannot be confirmed at this stage. This being said, the Project will adopt the 4R principle for solid waste management, which includes (in order of priority) to:

- Refuse single use plastics as much as possible;
- Reduce the use of non-recyclable products;
- Reuse solid wastes where possible to convert it into other useful products; and
- Recycle all wastes where possible.

#### 8.6.5 SEWAGE

The Wind Energy Facility will require sewage services during the construction and operational phases. Low volumes of sewage or liquid effluent are estimated during both phases. Liquid effluent will be limited to the ablution facilities during the construction and operational phases. Portable sanitation facilities (i.e. Chemical toilets) will be used during the construction phase, which will be regularly serviced and emptied by a registered contractor on a regular basis.

The Applicant may consider a conservancy tank or Maskam fusion system, which will be employed on site during the operational phase for which a registered company will be

contracted to store and transport sewage from site to an appropriate municipal wastewater treatment facility.

### 8.6.6 ELECTRICITY

Electricity on site will be from on-site diesel generators, as well as sourced from the national grid distribution networks.

### 8.7 EMPLOYMENT

In addition to the workforce required during the construction phase (which is anticipated to be approximately 200 to 250 staff), the Project is anticipated to require an additional ~20 staff during the operational phase of the Project.

### 8.8 SUMMARY OF PROJECT INFORMATION

#### WEF Technical Details

WEF Components	Technical Details	Description/Dimensions - Khoe
Maximum Generation Capacity		up to 232 MW
Turbine Capacity		Up to 8 MW
Type of technology		Onshore Wind
Number of Turbines		Up to 29
WTG Hub Height from ground level		up to 150 m
Blade Length		up to 100 m
Rotor Diameter		up to 200 m
Structure height (Tip Height)		up to 250 m
Structure orientation		Wind regiment dependent
<b>Area occupied by both permanent and construction laydown areas</b>		<ul style="list-style-type: none"> <li>• Concrete turbine foundations - approximately up to 1000m<sup>2</sup> per turbine</li> <li>• Each turbine will have a hardstand area of approximately up to 7500m<sup>2</sup> per turbine</li> <li>• Temporary laydown areas (with a combined footprint of up to 9 ha) which will accommodate the boom erection, storage and assembly area;</li> <li>• A temporary site camp establishment and concrete batching plants (with a combined footprint of up to 1 ha)</li> </ul>
Operations and maintenance buildings (O&M building) with parking area		up to 1 HA
Site Access		Via the R318
Area occupied by inverter transformer stations/substations		up to 2.5 HA

<b>WEF Technical Components</b>	<b>Details</b>	<b>Description/Dimensions - Khoe</b>
Capacity of on-site substation		132/33kv
Battery Energy Storage System footprint		up to 5 HA
BESS type		Lithium-ion technology
BESS Alternatives (site, technology, design and layout)		Same as above. See layout for design and position
Width of internal roads		Access roads to the site and between project components with a width of approximately 4.5 m and a servitude of 13.5 m.
Proximity to grid connection		This has not been determined at this stage of the Project.
Internal Cabling		Cabling between the turbines, to be laid underground where practical.
Height of fencing		Up to 3 metres

## 9. PUBLIC PARTICIPATION PROCESS

### 9.1 INITIAL PROCESS

The first stage of public consultation was undertaken during the initial notification phase prior to the completion and public review of the Draft Scoping Report. On the 14 December 2023, advertisements were placed in one provincial newspaper (The Daily Voice) and one local newspaper (Standard Breederivier Gazzette); site notices were erected on the site; and written notices were sent out to the affected landowners, surrounding landowners and occupiers of the site, as well as to key stakeholders and organ of state. The objective of this phase was to inform the National, Provincial and Local Government Authorities, relevant public, private sector entities, NGOs and local communities about the project and capture their initial views and issues of concern that is important for the formulation of a plan of study and to allow the public to register as I&APs.

Following the initial phase, notification letters were sent to all I&APs informing them of the availability of the draft scoping report for public review and comment, which took place for a period of 30-days from the Thursday, 29 February 2024 to Tuesday, 02 April 2024 (both days inclusive).

All issues raised during the initial notification and scoping phase has been taken into consideration and included in the EIA report. Volume II contains the Comments and Response Report which addresses all Interested and Affected Parties (I&APs) comments received to date

The primary aims of the public participation process (PPP) are:

- To inform I&APs of the proposed development;
- To identify issues, comments and concerns as raised by I&APs;
- To promote transparency and an understanding of the project and its potential consequences;
- To assist in identifying potential environmental (biophysical and socio-economic) impacts associated with the proposed development; and
- To ensure that all I&AP issues and comments are accurately recorded, addressed and documented in the comments and responses report.

### 9.2 EIA PHASE PUBLIC PARTICIPATION

During the EIA phase the following tasks will be undertaken for public participation:

- Notification letters to be sent out to registered I&APs, key stakeholders, and organs of state to inform them of the availability of the Draft Environmental Impact Assessment Report (DEIAR) for review and comment (30 days);
- The Comments and Reponses Report will be updated, recording comments and/or queries received and the responses provided; and
- Notification letters to all registered I&APs, key stakeholders, and organs of state to inform them of the decision by the DFFE and the appeal procedure.

Furthermore, I&APs will also be able to register on the I&AP database throughout the duration of the EIA process and registered I&APs will be informed about the progress of the application.

The public participation in the EIA phase has the following objectives:

- Inform I&APs about the EIA process followed to date;
- Present the specialist studies undertaken, impacts and proposed mitigation measures;
- Present the results of the Environmental Impact Assessment; and
- Collect concerns and expectations and take them into consideration in the EIA.

Details of the above information is attached in a public participation report (Volume III).

## 9.3 SUMMARY OF COMMENTS

### 9.3.1 INITIAL SCOPING PHASE

During the initial notification phase, no comments / queries / questions / concerns were received from I&APs.

### 9.3.2 SCOPING PHASE

During the scoping phase comment was received from the DFFE, other authority and I&APs. Responses to comments received are provided in Section 6 of the PP Report (Volume III), with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report (Appendix F).



## 10. ASSESSMENT OF POTENTIAL IMPACTS

This section evaluates the impacts associated with the construction, operational, decommissioning and cumulative phases of the WEF

### 10.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

It should be noted that an Agricultural Compliance Statement is not required to formally rate agricultural impacts by way of impact assessment tables.

An agricultural impact is a change to the future agricultural production potential of land. In most developments, including the one being assessed here, this is primarily caused by the exclusion of agriculture from the footprint of the development. Soil erosion and degradation may also contribute to loss of agricultural production potential. The significance of an agricultural impact is a direct function of the following three factors:

- the size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased);
- the baseline production potential (particularly cropping potential) of that land; and
- the length of time for which agriculture will be excluded (or for which potential will be decreased).

In the case of wind farms, the first factor, size of footprint, is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has, and regardless of the duration of the impact. This is because the required spacing between turbines means that the amount of land excluded from agricultural use is extremely small in relation to the surface area over which a wind farm is distributed. Wind farm infrastructure (including all associated infrastructure and roads) typically occupies less than 2% of the surface area, according to the typical surface area requirements of wind farms in South Africa (DEA, 2015). Most wind energy facilities, for which I have recently done assessments, occupy less than 1% of the surface area. All agricultural activities can continue unaffectedly on all parts of the farmland other than this small footprint, from which agriculture is excluded, and the actual loss of production potential is therefore insignificant.

A study done to measure the impact of existing wind farms on agricultural production potential (Lanz, 2018) is highly informative of the extent of the agricultural impact that is likely for this proposed development. Although the study was done in a different agricultural environment, it is similar in terms of being a site that includes croplands. There is no reason that the results obtained in that study would not be applicable to the area in this assessment. The overall conclusion of the study was that, although wind farms have been established within an area of cultivated farmland, it is highly unlikely that this has caused a reduction in agricultural production. Tiny amounts of cropland have been lost, but the consequence of this for agricultural production has been negligible. It is likely that the positive financial impacts of wind farming have outweighed the negative impacts, and that wind farming has benefited agriculture and agricultural production in the area.

As identified in the study, it is important to note that wind farms have both positive and negative effects on the production potential of land. It is the net sum of these positive and

negative effects that determines the extent of the change in future production potential. The positive effects are:

- increased financial security for farming operations - Reliable and predictable income will be generated by the farming enterprises through the lease of land to the energy facility. This will increase financial security and could improve farming operations and productivity through increased investment into farming; and
- improved security against stock theft and other crime due to the presence of security infrastructure and security personnel at the energy facility.

There are two additional effects, but because they are highly unlikely to influence agricultural production, they are not considered further. They are:

- Prevention of crop spraying by aircraft over land occupied by turbines – ground based or using drones for spraying are effective, alternative methods that can be used without implications for production or profitability; and
- Interference with farming operations - Construction (and decommissioning) activities are likely to have some nuisance impact for farming operations but are highly unlikely to have an impact on agricultural production.

The loss of agricultural potential by soil degradation can effectively be prevented for renewable energy developments by generic mitigation measures that are all inherent in the project engineering and/or are standard, best-practice for construction sites. Soil degradation does not therefore pose a significant impact risk.

Due to the facts that the energy facility will exclude only an insignificantly small area of agricultural production from the land and that its negative impact is offset by economic benefits to farming, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable.

The agricultural protocol requires an indication of the potential losses in production and employment from the change of the agricultural use of the land as a result of the proposed development. As this assessment has shown, the agricultural use of the land will be integrated with the renewable energy facility, and it will continue with no discernible change in terms of production. The expected losses in production and employment will therefore be zero.

### 10.1.1 MITIGATION MEASURES

Generic mitigation measures that are effective in preventing soil degradation are all inherent in the engineering of such a project and/or are standard, best-practice for construction sites.

- A system of storm water management, which will prevent erosion on and downstream of the site, will be an inherent part of the engineering design on site. Any occurrences of erosion must be attended to immediately and the integrity of the erosion control system at that point must be amended to prevent further erosion from occurring there. As part of the system, the integrity of the existing contour bank systems of erosion control on croplands, where they occur on steeper slopes, must be kept intact.
- Any excavations done during the construction phase, in areas that will be re-vegetated at the end of the construction phase, must separate the upper 25 cm of topsoil from the rest of the excavation spoils and store it in a separate stockpile. When the excavation is back-filled, the topsoil must be back-filled last, so that it is at the surface. Topsoil should only be

stripped in areas that are excavated. Across most of the site, including construction lay down areas, it will be much more effective for rehabilitation, to retain the topsoil in place. If levelling requires significant cutting, topsoil should be temporarily stockpiled and then re-spread after cutting, so that there is a covering of topsoil over the entire cut surface. Furthermore, there are no areas to be avoided in terms of agricultural impacts and no buffers are applicable.

### 10.2 FRESHWATER AND WETLANDS (AQUATICS)

It was determined that the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. This assumes that the mitigations listed below are considered coupled to the fact that the overall layouts have avoided any of the High / No-Go areas, unless making use of areas with impacts such as existing farm roads which has taken place, however it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

The loss of irreplaceable aquatic habitat and/or important aquatic obligate biota is therefore highly unlikely. The impacts are easily mitigated (provided the mitigation measures and monitoring plan within the EMP and this report are implemented and adhered to during all phases of the project).

The following potential impacts were assessed with regard aquatic environment that would be affected by the proposed development:

- Impact 1: Loss of habitat containing protected species or Species of Special Concern and / or habitats that could contain species listed as Critically Endangered, Endangered or Vulnerable
- Impact 2: Loss of any critical ecological corridors and the connectivity of habitats which are linked to future conservation plans or protected areas expansion and NFEFAs, associated within any riverine or wetland systems.
- Impact 3: Potential spread of alien vegetation
- Impact 4: Loss of riparian habitat
- Impact 5: Changes to the hydrological regime and increased potential for erosion
- Impact 6: Changes to water quality

#### 10.2.1 CONSTRUCTION, OPERATIONAL AND DECOMMISSIONING PHASE

##### Impact Phase: Construction and Decommissioning

**Nature of the impact:** Loss of vegetation and in particular species / habitats that could contain listed as Critically Endangered and or Vulnerable species (direct)

**Description of Impact:** Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity. However no aquatic vegetation or fauna with conservation concern were observed during this assessment, coupled to the fact that any sensitive areas will be avoided.

Impact Status: Negative

Extent	Duration	Reversibility	Magnitude	Probability
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Impact Phase: Construction and Decommissioning					
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout prior to construction.
- Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.
- Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).

To minimise the impact of the access roads:

- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop because of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal

### Impact Phase: Construction and Decommissioning

of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

#### Impact Phase: Construction and Decommissioning

**Nature of the impact:** Loss of any critical corridors and connect habitats that are linked to any future conservation plans or protected areas expansion (direct) is not expected as these have been avoided, coupled to the fact that hydrological connections will be retained through avoidance or the inclusion of ecological buffers.

**Description of Impact:** Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

- Mitigation measures to reduce residual risk or enhance opportunities:
- The aquatic systems have been mapped to a finer scale and have taken cognizance of any potential CBAs. As High / No-Go have been avoided by the major infrastructure such as turbines and buildings, the aquatic zones associated within the CBA / ESAs have also been avoided. Roads will need to traverse these areas, thus it is important to try and select existing areas with impacts / crossings where possible
- The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout prior to construction. Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads:

**Impact Phase: Construction and Decommissioning**

- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.
- It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures
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**Impact Phase: Construction and Operation**

Nature of the impact: Any physical disturbance could result in the spread of alien vegetation (direct)

Description of Impact: During construction, complete clearing of the roads and turbine areas, as well as any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	

**Impact Phase: Construction and Operation**

<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)	Low Negative Impact (14)
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Was public comment received?	No
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Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- Alien vegetation management must be initiated at the beginning of the construction period and must extend into any remaining areas into the operation phase on the facility
- The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications

Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan

Residual impact	Very low and acceptable, with adoption of mitigation measures and monitoring
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**Impact Phase: Construction and Decommissioning**

**Nature of the impact:** It was recommended that all wetlands / riverine systems as well as the inclusive of buffers, be avoided. This was then taken forward in the design process.

**Description of Impact:** During construction, complete clearing of the roads and turbine areas, as well as any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, all Very High Sensitivity / No-Go areas have been avoided by the proposed layout by also making use of existing road crossings or considering any of the proposed buffers.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in	No				

### Impact Phase: Construction and Decommissioning

mitigation measures?

Mitigation measures to reduce residual risk or enhance opportunities:

- The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout prior to construction.
- Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.
- Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).
- To minimise the impact of the access roads:
- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures
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### Impact Phase: Construction and Decommissioning

**Nature of the impact:** Increased hard surfaces can result in increases in runoff generated by the site, thereby resulting in changes to localised hydrological regimes.

**Description of Impact:** During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas have all been avoided by the proposed layout by also making use of existing road crossings or by considering any of the proposed buffers.

Impact Status: Negative



<b>Impact Phase: Construction and Decommissioning</b>					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- No stormwater discharged may be directed to delineated aquatic zones or the associated buffers.
- A stormwater management plan finalised prior to construction, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas
- To minimise the impact of the access roads:
  - Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
  - Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas.. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.

**Impact Phase: Construction and Decommissioning**

- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.
- It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures
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**Impact Phase: Construction and Decommissioning**

Nature of the impact: Potential impact on localised surface water quality (indirect)

Description of Impact: During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- All liquid chemicals including fuels and oil, including for the BESS, must be stored in with secondary containment (bunds or containers or berms) that can contain a leak or spill. Such facilities must be inspected routinely and must have the suitable PPE and spill kits needed to contain likely worst-case scenario leak or spill in that facility, safely.
- Washing and cleaning of equipment must be done in designated wash bays, where rinse water is contained in evaporation/sedimentation ponds (to capture oils, grease cement and sediment).
- Mechanical plant and bowsers must not be refueled or serviced within 100m of a river channel or wetland.

**Impact Phase: Construction and Decommissioning**

- All construction camps, lay down areas, wash bays, batching plants or areas and any stores should be beyond any demarcated water courses and their respective buffers.
- Littering and contamination associated with construction activity must be avoided through effective construction camp management.
- No stockpiling should take place within or near a water course.
- All stockpiles must be protected and located in flat areas where run-off will be minimised and sediment recoverable.

ECO monitors the site on a daily basis to ensure plant is in working order (minimise leaks), spills are prevented and if they do occur, are quickly rectified.

Residual impact	Low risk and acceptable, with adoption of mitigation measures and monitoring
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**10.3 TERRESTRIAL BIODIVERSITY**

**10.3.1 CONSTRUCTION AND DECOMMISSION PHASES**

The impacts that will be most prevalent during the Construction Phase of the proposed Khoe WEF are:

- Vegetation Clearing
- Chemical Contamination
- Reduced Connectivity and Restricted Movement
- Altered Flow Regimes
- Enhancement of Overgrazing
- Disturbance and/or Displacement
- Mortality

The anticipated impacts during the Decommissioning Phase of the proposed Khoe WEF mirror those expected during the construction phase. Decommissioning activities are foreseen to take a similar amount of time as construction activities. However, they primarily involve dismantling the structures that were previously erected for the development. The impacts that will be most prevalent during the Decommission Phase of the proposed Khoe WEF are:

- Vegetation Clearing
- Reduced Connectivity and Restricted Movement
- Disturbance and/or Displacement
- Mortality

**Impact Phase: Construction/ Decommissioning**

Nature of the impact: Potential vegetation clearing impacts associated with the construction and decommissioning phase of the proposed development

Description of Impact: Certain areas will need to be cleared of vegetation to facilitate construction of associated infrastructure and transport of personnel on site. This impact will negatively affect endemic, threatened or important flora species.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
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**Impact Phase: Construction/ Decommissioning**

<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (44)		Low Negative Impact (24)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The development footprint must avoid No-Go/ High Sensitivity areas as much as possible.
- Limit the area of impact as much as possible.
- A pre-construction walkthrough during the optimal flowering period (spring) of the finalized development layout must be conducted to ensure that No-Go and High Sensitivity areas are avoided where possible.
- Ensure that lay-down and other temporary infrastructure are within Low Sensitivity areas.
- Rehabilitate disturbed areas that are not required by the operational phase of the development.
- All construction staff on site must attend an environmental induction to ensure that basic environmental principles are adhered to. This includes topics such as avoiding fire hazards, no littering, appropriate handling of pollution and chemical spills, minimizing wildlife interactions, remaining within demarcated construction areas, avoidance of No-Go areas and sensitive habitats etc.
- Demarcate sensitive areas near the development footprint as no-go areas with construction tape or similar and clearly marked as No-Go areas.
- An EMPr must be implemented and must provide a detailed description of how construction activities must be conducted to reduce unnecessary clearing and/or destruction of habitat.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in soil erosion and alien invasive species establishing themselves before natural flora can. All mitigation measures would need to be adhered to and continuous monitoring and maintenance is required after construction.
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**Impact Phase: Construction**

Nature of the impact: Potential chemical contamination impacts associated with the construction phase of the proposed development.

Description of Impact: Chemical contamination during the Construction phase. Spillage of construction materials or chemicals can adversely impact waterbodies and the fauna and flora on which they depend.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable

**Impact Phase: Construction**

<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The development footprint must avoid High Sensitivity areas as much as possible.
- Ensure proper storage and handling of chemicals (fuel, lubricants, cleaning agents) used on-site. Store all chemicals in designated areas equipped with spill containment measures to prevent leaks and spills.
- A chemical spill response plan must be developed before construction activities are undertaken. This spill response plan must be implemented by an ECO on site.
- Provide appropriate training to construction staff on the safe handling of chemical and hazardous materials.
- Implement measures to prevent runoff to nearby waterbodies by installing sediment traps and/or containment pods. This should be addressed in the Stormwater Assessment.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in aquatic systems on site as well as soil cover. The use of chemicals on site should be limited as far as possible and environmentally friendly alternatives should be utilized, resulting in no major residual impacts associated with the phase.
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**Impact Phase: Construction/ Decommissioning**

**Nature of the impact:** Reduced connectivity and restricted movement of fauna impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Construction and Decommissioning activities and novel infrastructure (e.g., perimeter fencing) may exclude species from portions of suitable habitat by restricting animals' movement across the landscape.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		

**Impact Phase: Construction/ Decommissioning**

**S=(E+D+R+M)\*P**      Moderate Negative Impact (44)      Low Negative Impact (24)

Was public comment received?	No
Has public comment been included in mitigation measures?	No

Mitigation measures to reduce residual risk or enhance opportunities:

- Minimization of length and width of road network.
- Fencing and road designs to allow for passage of animals (e.g., short, wide culverts in roads and wildlife friendly fencing).
- Implement habitat enhancement and restoration measures to offset the loss of connectivity caused by construction and decommissioning activities. This can be achieved by planting native vegetation, installing nesting boxes, or creating artificial shelters to provide alternative habitats for displaced fauna species and enhance connectivity within the landscape. This should be considered in the EMPr.
- All recommendations in the Terrestrial Animal Specialist Assessment must be adhered to.

Residual impact	Residual impacts are expected to occur for the area specifically for wildlife. Change in wildlife behaviour as a response to activities associated with the WEF is expected and should be continuously monitored.
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**Impact Phase: Construction**

**Nature of the impact:** Potential altered flow regime impacts associated with the construction phase of the proposed development.

**Description of Impact:** Construction of infrastructure may alter water flow characteristics such as runoff, sedimentation and infiltration. These could change vegetation community composition, soil depth, and habitat suitability over time.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

**Impact Phase: Construction**

- Adequate flow and erosion control measures should be included in the EMPr.
- Ongoing monitoring and rehabilitation of disturbed areas must be implemented.
- All recommendations in the Stormwater Assessment must be strictly adhered to.

Residual impact	Vegetation clearing may impact runoff and infiltration rates. As a result, residual impacts may occur after mitigation measures have been applied, but these impacts are manageable.
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**Impact Phase: Construction/ Decommissioning**

**Nature of the impact:** Potential disturbance and/or displacement impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Increased activity, movement of machinery and operation of equipment may disturb and/or displace certain animal SCCs from the vicinity of construction and decommissioning

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	3	3	3	4	4
<b>With Mitigation</b>	Local	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	2	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Temporary laydown areas, construction yards and site office buildings to be placed in low sensitivity or modified areas.
- Pre-construction baseline animal monitoring programme must be implemented, with focus on areas identified for the construction footprint during the design phase (e.g., road network).
- Avoidance of highly sensitive habitats for construction areas.
- Clearly demarcated construction areas and no unauthorized personnel to be permitted beyond demarcated areas.
- Adequate noise reduction measures (where possible) on heavy machinery.
- Minimize construction activity that occurs between dusk and dawn when animals are most active.
- Minimization of lighting used to illuminate construction areas and site buildings.

Residual impact	Residual impacts include displaced SCC as a result of activities associated with the WEF.
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**Impact Phase: Construction/Decommissioning**

**Nature of the impact:** Potential mortality of faunal and flora species due to direct and indirect impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Direct mortality due to increased traffic and illegal collection/poaching/entrapment, and indirect mortality due to potential increased predator presence and decreased detection can occur during the Construction/Decommissioning Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	Very High	Highly Probably
<b>Score</b>	2	4	5	5	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	<b>High Negative Impact (64)</b>		<b>Low Negative Impact (30)</b>		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- No movement of vehicles and personnel between dusk and dawn.
- Implementation and enforcement of speed limits.
- Roadkill monitoring and recording programme.
- Induction toolbox talks to personnel to increase awareness about animal SCCs present and roadkill risks.
- No unauthorized movement of personnel.
- No unauthorized access to the construction site.
- No trenches to be left uncovered overnight.
- Trenches, excavations and cattle grids to have slopes to allow for animals to escape should they fall in.
- No hunting permitted.
- No dogs or cats permitted (other than those of the landowner).
- Waste management programme to prevent trash buildup attracting species such as crows.
- Roadkill to be immediately reported, removed and suitably disposed of to prevent scavenging (e.g., buried).
- Construction activity to be minimized during the night to reduce noise pollution during periods when Riverine Rabbit are most active.

Residual impact	Residual impacts include direct mortality of species of conservation concern as a result of activities associated with the WEF.
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### 10.3.2 OPERATION PHASE

The anticipated impacts for the operational phase of the proposed development are:

- Habitat Fragmentation
- Potential Encroachment of Alien Invasive Species



- Light, Noise and Visual Pollution
- Faunal Mortality and Loss of SCC
- Soil erosion
- Unwanted Fires

Their significance with and without the recommended mitigation measures are assessed in the tables below.

### Impact Phase: Operation

**Nature of the impact:** Potential habitat fragmentation impacts associated with the operational phase of the proposed development.

**Description of Impact:** Habitat fragmentation due to the presence of wind turbines and associated infrastructure is anticipated for the operational phase. Fragmented habitats may cause ecological barriers and restricted gene flow, indirectly affecting faunal and flora species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probably
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- The EMPr should include biodiversity monitoring and an adaptive management plan for the operational phase to ensure there are no adverse impacts observed to the fauna community.
- Biodiversity monitoring must be implemented for various specialisms to assess the ongoing impacts of the operational wind farm compared to pre-construction baseline data. Specialists would need to be contracted by the Functional Entity and monitoring must come into effect in direct alignment with various specialist Guidelines and Best Practice.
- Implement habitat enhancement and restoration measures to offset the loss of connectivity caused by operational activities. This can be achieved by planting native vegetation, installing nesting boxes, or creating artificial shelters to provide alternative habitats for displaced fauna species and enhance connectivity within the landscape. This should be considered in the EMPr.
- All recommendations in the Terrestrial Animal Specialist Assessment must be adhered to.

Residual impact	Residual impacts include displacement of species, potentially species of conservation concern, from the site.
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**Impact Phase: Operation**

**Nature of the impact:** Potential encroachment of alien invasive species resulting in loss of flora SCC associated with the operational phase of the proposed development.

**Description of Impact:** Movement of personnel, and increased disturbance puts the proposed development area at greater risk of alien invasive species moving into and spreading within the area. Alien invasive species will encroach into disturbed areas left behind by construction activities and may go undetected during the operational phase. This impact results in the potential loss of flora SCC or endemic species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Definite
<b>Score</b>	2	4	5	5	5
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	<b>High Negative Impact (80)</b>		<b>Low Negative Impact (20)</b>		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Disturbed areas such as road verges, lay-down areas and areas utilised by temporary construction facilities must be regularly monitored to detect the establishment of alien species and those species should be eradicated before they spread.
- Regular alien clearing should be conducted, as needed, using the best-practice methods for the species concerned, the use of herbicides should be avoided as far as possible.
- The use of herbicides (if absolutely required) for the control and eradication of alien grasses should be done in accordance with the alien eradication programme in the EMPr to reduce unintended ecological impacts.

Residual impact	Residual impacts include loss of natural flora and suitable habitat due to encroachment of alien invasive species.
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### Impact Phase: Operation

**Nature of the impact:** Potential light, noise and visual pollution impacts associated with the operational phase of the proposed development.

**Description of Impact:** Wind farms have the potential to directly impact species through noise and vibration, light, and visual pollution. Visual disturbance caused by wind turbines and associated infrastructure can impact faunal species' sight and deter their navigation and mating cues. Artificial light present at night from operational turbines may attract insects and also attract bats posing a collision risk. The WEF's associated infrastructure will cause noise and vibrations throughout the site and adjacent areas. This may impact faunal species by affecting their behaviour and deter species from their natural habitat.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probably
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Use low-intensity and downward-facing lighting fixtures to reduce the attraction of insects and mitigate the risk of bat collisions.
- Employ noise mitigation measures, such as acoustic insulation, to reduce the transmission of noise from wind turbines and associated infrastructure.
- Develop and implement operational protocols to minimize noise and vibration disturbances during critical periods for faunal species, such as breeding, nesting, and foraging.
- Schedule maintenance activities and construction work during off-peak hours to minimize disruption to wildlife behavior and habitat use.

Residual impact	Residual impacts include potential collision risks of SCC by potentially attracting them into the rotor swept area. Other residual impacts include loss of species abundance and diversity from the area due to the WEF and associated activities.
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**Impact Phase: Operation**

**Nature of the impact:** Potential fire impacts associated with the operational phase of the proposed development.

**Description of Impact:** Increased personnel on site increases the fire risk due to smoking and/or use of electrical equipment on site.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- No open fires should be permitted outside of designated areas.
- Smoking areas must be defined, and no smoking should be permitted outside of designated areas.
- An emergency response plan for uncontrolled fires must be in place prior to operation and implemented for the duration of the WEF's lifespan.
- All staff members must have a Fire and Safety induction to increase awareness.

Residual impact	Residual impacts include loss of faunal SCC. This is why it is critical to manage unplanned fires as soon as possible to avoid mortality.
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**Impact Phase: Operational**

**Nature of the impact:** Direct mortality through collision, entrapment and illegal collecting or poaching of animals

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	4	4
<b>With Mitigation</b>	Local	Long term	Reversible	High	Low Probability
<b>Score</b>	2	4	1	4	2

**Impact Phase: Operational**

Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative (44)	Low Negative (22)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities:		
<ul style="list-style-type: none"> <li>• Strictly enforced speed limits;</li> <li>• Strictly controlled site access;</li> <li>• Minimized movement of personnel vehicles at night;</li> <li>• Wildlife friendly road crossings (including culverts that allow animal movement below the road surface);</li> <li>• Signage, education and awareness induction training about relevant animal SCCs to personnel;</li> <li>• Wildlife-friendly fencing and cattle grids.</li> </ul>		
Residual impact	None	

**Impact Phase: Operation**

**Nature of the impact:** Potential soil erosion impacts associated with the operational phase of the proposed development.

**Description of Impact:** Soil erosion facilitated by clearing vegetation and increased road use promotes soil displacement and loss during the Operational Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
Significance Calculation	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

**Impact Phase: Operation**

- Utilize existing servitudes and access roads wherever possible, any new roads or the upgrading of roads should be minimized as far as possible and not be larger than required.
- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be allowed.
- Ensure that sufficient erosion control measures are constructed on all servitudes and access roads in the project area, including where such crosses waterbodies.
- Rehabilitate existing servitude and access roads in the project area with sufficient erosion control measures to prevent the loss of soil and the degradation of vegetation.
- Construction activities in or near drainage lines, washes or temporary inundated depressions must only take place during the dry season.
- An EMPr must be implemented and must provide a detailed description of how construction activities must be conducted to avoid increased erosion.
- Erosion management at the site should take place according to the Erosion Management Plan and Rehabilitation Plan included in the EMPr.
- All roads and other hardened surfaces should have runoff control features which redirect water flow and dissipate energy in the water stream which may pose an erosion risk.
- Regular monitoring for erosion after construction to ensure that no erosion problems have developed as result of the disturbance during the operation of the project.

Residual impact	Residual impacts include changes to infiltration rates and loss of soil fertility.
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**10.4 FAUNAL**

**10.4.1 CONSTRUCTION AND DECOMMISSIONING PHASES**

The following impacts are identified as the major impacts that are likely to be associated with the development of the Khoe WEF:

- Direct Habitat Loss
- Indirect Habitat Loss
- Disturbance/displacement
- Direct Mortality
- Indirect Mortality

**Impact Phase: Construction**

Nature of the impact: Direct habitat loss through vegetation clearing or fire during construction

Impact Status: Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	1	3	3	3	4
<b>With Mitigation</b>	Local	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		

**Impact Phase: Construction**

<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)	Moderate Positive (44)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	

Mitigation measures to reduce residual risk or enhance opportunities:

- The production of an appropriate rehabilitation and restoration plan with the aims of improving and monitoring habitat availability and connectivity, in consultation with specialists and relevant stakeholders (e.g., CapeNature, Endangered Wildlife Trust) prior to construction;
- Strategic rehabilitation and restoration of currently modified areas within areas of high sensitivity to be initiated concurrently with the construction phase;
- Minimization of development footprint and utilization of existing roads and existing modified areas for temporary laydown areas and site buildings;
- Rehabilitate disturbed areas that are not required by the operational phase of the development;
- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be allowed;
- An environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes topics such as avoiding fire hazards, littering, appropriate handling of pollution and chemical spills, minimizing wildlife interactions, remaining within demarcated construction areas;
- All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill;
- No open fires to be permitted outside of designated areas.

Residual impact	Some residual impact is likely; however, available habitats are widespread and the size of the development footprint is relatively small compared to the total project area. In-situ habitat restoration would result in a net-gain.
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**Impact Phase: Construction**

**Nature of the impact:** Exclusion of animal SCCs from areas that remain outside of the immediate development footprint.

**Impact Status:** Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	2	3	3	3	3
<b>With Mitigation</b>	Local	Medium term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (33)		Moderate Positive (44)		
Was public comment received?	No				

**Impact Phase: Construction**

Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- The production of an appropriate rehabilitation and restoration plan with the aims of improving and monitoring habitat availability and connectivity, in consultation with specialists and relevant stakeholders (e.g., CapeNature, Endangered Wildlife Trust) prior to construction;
- Strategic rehabilitation and restoration of currently modified areas to be initiated concurrently with the construction phase;
- Fencing and road designs to allow for passage of animals (e.g., appropriately sized culverts in roads and wildlife friendly fencing);
- Appropriate water runoff control measures to be constructed on all hard surfaces;
- Appropriate erosion control measures to be constructed on all servitudes and access roads in the project area;
- Rehabilitate existing servitude and access roads in the project area with sufficient erosion control measures to prevent the loss of soil and the degradation of vegetation.

Residual impact	Net-gain of available habitat and connectivity through restoration of potential movement corridors currently modified by agricultural activity.
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**Impact Phase: Construction**

**Nature of the impact:** The displacement or disturbance of fauna due to construction activities

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Recoverable	High	Highly Probable
<b>Score</b>	1	2	3	4	4
<b>With Mitigation</b>	Site	Short term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	2	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)		Low Negative (18)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Restrict construction activity to daylight hours;
- Minimize activity that occurs between dusk and dawn;
- Pre-construction baseline animal monitoring programme, with focus on areas identified for the construction footprint during the design phase (e.g., road network);
- Avoidance of remaining natural or near-natural habitats for laydown areas and temporary site offices
- Clearly demarcated construction areas and no unauthorized personnel to be permitted beyond demarcated areas;
- Adequate noise reduction measures (where possible) on heavy machinery;



**Impact Phase: Construction**

- Construction areas and site buildings should be lit with as little light as practically possible, with lights directed downwards where appropriate to reduce the disturbance and foraging activities of nocturnal species;
- No dogs or cats other than those of the landowners permitted on site as these animals cause unnecessary disturbance such as chasing fauna.

Residual impact	None
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Impact Phase: Construction

**Nature of the impact:** Direct impact to fauna caused by construction activities, such as increased risk of injury or mortality from collision with vehicles due to increased traffic, the increased possibility of illegal hunting, poaching, persecution or harvesting of fauna

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Recoverable	High	Highly Probable
<b>Score</b>	1	2	3	4	4
<b>With Mitigation</b>	Site	Short term	Recoverable	High	Low Probability
<b>Score</b>	1	2	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)		Low Negative (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be permitted;
- No movement of construction vehicles between dusk and dawn;
- Implementation and enforcement of speed limits (30 km/h);
- Roadkill monitoring and recording programme;
- Induction toolbox talk to construction personnel to increase awareness about animal SCCs present in the broader area and roadkill risks;
- No unauthorized movement of personnel;
- No unauthorized access to the construction site;
- No trenches or excavations to be left uncovered overnight;
- Trenches, excavations and cattle grids to have slopes to allow for animals to escape should they fall in;
- No hunting permitted;
- No dogs or cats permitted (other than those of the landowner);
- The collection, hunting or harvesting of animals at the site should be strictly forbidden;
- Any fauna directly threatened by the construction activities should be removed to a safe location by the environmental control officer or other suitably qualified person.

Residual impact	None
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**Impact Phase: Construction****Nature of the impact:** Mortality of animal SCCs as an indirect result of construction activities**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Recoverable	High	Highly Probable
<b>Score</b>	1	2	3	4	4
<b>With Mitigation</b>	Site	Short term	Recoverable	High	Low Probability
<b>Score</b>	1	2	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (40)		Low Negative (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Waste management programme to prevent trash buildup attracting species such as crows;</li> <li>Roadkill to be immediately reported to the environmental control officer, removed and suitably disposed of to prevent scavenging (e.g., buried);</li> <li>Construction activity to be minimized during the night to reduce noise pollution during periods when Riverine Rabbit are most active in the broader area.</li> </ul>					
Residual impact	None				

**10.4.2 OPERATIONAL PHASE**

The following impacts are identified as the major impacts that are likely to be associated with the development of the Khoe WEF:

- Direct Habitat Loss;
- Indirect Habitat Loss;
- Disturbance/displacement;
- Direct Mortality; and
- Indirect Mortality.

**Impact Phase: Operational****Nature of the impact:** Direct habitat loss through altered fire regimes**Impact Status:** Negative

Impact Phase: Operational					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probable
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Local	Long term	Recoverable	High	Low Probability
<b>Score</b>	2	4	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (52)		Low Negative (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The implementation of an appropriate rehabilitation and restoration plan with the aims of improving and monitoring habitat availability and connectivity;</li> <li>No open fires to be permitted outside of designated areas;</li> <li>Environmental Management Programme must include prescribed burn regimes that match natural frequencies and intensity as closely as appropriate; and</li> <li>Novel infrastructure must be compatible with fire regimes appropriate for the habitat types present across the site.</li> </ul>					
Residual impact	None				

Impact Phase: Operational					
<b>Nature of the impact:</b> Effective reduction in available habitat through restriction of animal movement, reduced habitat integrity or increased competition					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probable
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Local	Long term	Recoverable	High	Low Probability
<b>Score</b>	2	4	3	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (52)		Low Negative (26)		
Was public comment received?	No				

**Impact Phase: Operational**

Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- Wildlife friendly road and fence crossings to be frequently serviced to facilitate passage of fauna across the site (e.g., road culverts to be cleared of debris);
- Livestock grazing pressure must be reduced in natural, near-natural and recovered areas;
- Flow and erosion control measures to be continually monitored for efficacy and remedied if pooling, sedimentation or erosion is observed;
- Previously disturbed areas such as road verges, lay-down areas and areas utilized by temporary construction facilities must be regularly monitored to detect the establishment of alien species and those species should be eradicated before they spread;
- Regular alien clearing should be conducted, as needed, using the best-practice methods for the species concerned, the use of herbicides should be avoided as far as possible.

Residual impact	None
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**Impact Phase: Operational**

**Nature of the impact:** Disturbance and/ or displacement of animals due to routine operational activity

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	4	3
<b>With Mitigation</b>	Local	Long term	Reversible	High	Low Probability
<b>Score</b>	2	4	1	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (33)		Low Negative (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Minimized lighting;
- Minimize activity that occurs between dusk and dawn;
- Adequate noise reduction measures (where possible) on machinery;
- Wind Turbine Generators should not spin below a certain cut-in speed, i.e., no free-spinning of WTG blades permitted;
- Speed limits should be strictly enforced to reduce unnecessary noise;
- No dogs or cats other than those of the landowners should be allowed on site as these animals cause unnecessary disturbance such as chasing fauna; and
- If possible, long-term animal monitoring program.

**Impact Phase: Operational**

Residual impact	Elevated background noise levels
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**Impact Phase: Operational**

**Nature of the impact:** Direct mortality through collision, entrapment and illegal collecting or poaching of animals

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	4	4
<b>With Mitigation</b>	Local	Long term	Reversible	High	Low Probability
<b>Score</b>	2	4	1	4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (44)		Low Negative (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Strictly enforced speed limits;</li> <li>• Strictly controlled site access;</li> <li>• Minimized movement of personnel vehicles at night;</li> <li>• Wildlife friendly road crossings (including culverts that allow animal movement below the road surface);</li> <li>• Signage, education and awareness induction training about relevant animal SCCs to personnel;</li> <li>• Wildlife-friendly fencing and cattle grids.</li> </ul>					
Residual impact	None				

**Impact Phase: Operational**

**Nature of the impact:** Indirect mortality from increased predator densities and/ or reduced predator avoidance ability

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Long term	Irreversible	High	Highly Probable
<b>Score</b>	1	4	5	4	4
<b>With Mitigation</b>	Site	Long term	Recoverable	Low	Probable
<b>Score</b>	1	4	3	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (56)		Low Negative (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Overhead Transmission Lines to be of a type and design that reduces nesting opportunities (e.g., solid pylon design);</li> <li>Nest and perch deterrents on transmission line pylons;</li> <li>Waste management programme to be implemented;</li> <li>Roadkill to be reported and immediately removed for adequate disposal that prevents scavenging (e.g., buried); and</li> <li>No spinning wind turbine generators at wind speeds below a certain cut-in speed (i.e. no free-spinning blades).</li> </ul>					
Residual impact	Elevated background noise levels				

**Impact Phase:** All

**Nature of the impact:** Impacts of all phases of the proposed development on ecological processes of the area

**Impact Status:** Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	High	Highly Probable
<b>Score</b>	2	4	3	4	4
<b>With Mitigation</b>	Local	Long term	Recoverable	High	Probable
<b>Score</b>	2	4	3	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (52)		Moderate Positive (39)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes, identification and improvement of potential corridors is the primary aim of recommended mitigation measures				

**Impact Phase: All**

Mitigation measures to reduce residual risk or enhance opportunities:

- In-situ habitat restoration designed to improve connectivity between natural/near-natural patches and facilitate animal SCC movement across the site (do be done by a specialist in consultation with appropriate stakeholders);
- Restoration and rehabilitation of currently modified agricultural land;
- Partner with the Drylands Conservation Programme of the Endangered Wildlife Trust to enhance the ecosystem processes across the site, e.g. through the Biodiversity Stewardship Programme and/ or the provision of research support;
- Initiation of formal, long-term research programmes across the site, offering access to the property for the purposes of research on riverine rabbit if/when approached by appropriately recognised academic institutions; and
- Site-specific Environmental Management Programme.

Residual impact	Enhancement of ecological processes
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**10.5 FLORA**

The impacts that will be most prevalent during the Construction Phase of the proposed Khoe WEF are:

- Vegetation Clearing
- Chemical Contamination
- Altered Flow Regimes
- Mortality

**10.5.1 CONSTRUCTION PHASE AND DECOMMISSION PHASES****Impact Phase: Construction**

**Nature of the impact:** Potential vegetation clearing impacts associated with the construction and decommissioning phase of the proposed development

**Description of Impact:** Certain areas will need to be cleared of vegetation to facilitate construction of associated infrastructure and transport of personnel on site. This impact can negatively affect endemic, threatened or important flora species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Highly Probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	2	3	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (44)		Low Negative Impact (24)		
Was public comment received?	No				

**Impact Phase: Construction**

Has public comment been included in mitigation measures?	No
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Mitigation measures to reduce residual risk or enhance opportunities:

- The development footprint must avoid No-Go/ High Sensitivity areas as much as possible.
- Limit the area of impact as much as possible.
- Where micro-siting takes place, a pre-construction walkthrough during the optimal flowering period (spring) of the finalized development layout must be conducted to ensure that No-Go and High Sensitivity areas are avoided where possible.
- Ensure that lay-down and other temporary infrastructure are within Low Sensitivity areas.
- Rehabilitate disturbed areas that are not required by the operational phase of the development.
- All construction staff on site must attend an environmental induction to ensure that basic environmental principles are adhered to. This includes topics such as avoiding fire hazards, no littering, appropriate handling of pollution and chemical spills, remaining within demarcated construction areas, avoidance of No-Go areas and sensitive habitats etc.
- Demarcate sensitive areas near the development footprint as no-go areas with construction tape or similar and clearly marked as No-Go areas.
- An EMPr must be implemented and must provide a detailed description of how construction activities must be conducted to reduce unnecessary clearing and/or destruction of habitat.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in soil erosion and alien invasive species establishing themselves before natural flora can. All mitigation measures would need to be adhered to and continuous monitoring and maintenance is required after construction.
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**Impact Phase: Construction**

**Nature of the impact:** Potential chemical contamination impacts associated with the construction phase of the proposed development.

**Description of Impact:** Chemical contamination during the Construction phase. Spillage of construction materials or chemicals can adversely impact waterbodies and the flora on which they depend.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:



**Impact Phase: Construction**

- The development footprint must avoid High Sensitivity areas as much as possible.
- Ensure proper storage and handling of chemicals (fuel, lubricants, cleaning agents) used on-site. Store all chemicals in designated areas equipped with spill containment measures to prevent leaks and spills.
- A chemical spill response plan must be developed before construction activities are undertaken. This spill response plan must be implemented by an ECO on site.
- Provide appropriate training to construction staff on the safe handling of chemical and hazardous materials.
- Implement measures to prevent runoff to nearby waterbodies by installing sediment traps and/or containment pods. This should be addressed in the Stormwater Assessment.

Residual impact	Residual impacts are expected to occur for the area and may be relevant in aquatic systems on site as well as soil cover. The use of chemicals on site should be limited as far as possible and environmentally friendly alternatives should be utilized, resulting in no major residual impacts associated with the phase.
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**Impact Phase: Construction**

**Nature of the impact:** Potential altered flow regime impacts associated with the construction phase of the proposed development.

**Description of Impact:** Construction of infrastructure may alter water flow characteristics such as runoff, sedimentation and infiltration. These could change vegetation community composition, soil depth, and habitat suitability over time.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium term	Recoverable	High	Highly Probable
<b>Score</b>	2	3	3	4	4
<b>With Mitigation</b>	Site	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	1	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Adequate flow and erosion control measures should be included in the EMPr.
- Ongoing monitoring and rehabilitation of disturbed areas must be implemented.
- All recommendations in the Stormwater Assessment must be strictly adhered to.

Residual impact	Vegetation clearing may impact runoff and infiltration rates. As a result, residual impacts may occur after mitigation measures have been applied, but these impacts are manageable.
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**Impact Phase: Construction/ Decommissioning**

**Nature of the impact:** Potential mortality of flora species due to direct and indirect impacts associated with the construction and decommissioning phase of the proposed development.

**Description of Impact:** Direct mortality due to increased traffic and illegal collection/poaching/entrapment, and indirect mortality due to potential increased herbivore presence and decreased detection can occur during the Construction and Decommissioning Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	Very High	Highly Probably
<b>Score</b>	2	4	5	5	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (64)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>No movement of construction vehicles between dusk and dawn.</li> <li>Induction toolbox talk to construction personnel to increase awareness about flora SCCs present.</li> <li>No unauthorized movement of personnel.</li> <li>No unauthorized access to the construction site.</li> <li>A Plant Rescue and Rehabilitation Plan must be designed before construction takes place and implemented during all phases of the project lifecycle.</li> </ul>					
Residual impact	Residual impacts include direct mortality of species of conservation concern as a result of activities associated with the WEF.				

The anticipated impacts for the operational phase of the proposed development are:

- Potential Encroachment of Alien Invasive Species
- Flora Mortality and Loss of SCC
- Soil erosion
- Unwanted Fires

### 10.5.2 OPERATION PHASE

**Impact Phase: Operation**

**Nature of the impact:** Potential encroachment of alien invasive species resulting in loss of flora SCC associated with the operational phase of the proposed development.

**Description of Impact:** Movement of personnel, and increased disturbance puts the proposed development area at greater risk of alien invasive species moving into and spreading within the area.

**Impact Phase: Operation**

Alien invasive species will encroach into disturbed areas left behind by construction activities and may go undetected during the operational phase. This impact results in the potential loss of flora SCC or endemic species.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Definite
<b>Score</b>	2	4	5	5	5
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (80)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Disturbed areas such as road verges, lay-down areas and areas utilised by temporary construction facilities must be regularly monitored to detect the establishment of alien species and those species should be eradicated before they spread.
- Regular alien clearing should be conducted, as needed, using the best-practice methods for the species concerned, the use of herbicides should be avoided as far as possible.
- The use of herbicides (if absolutely required) for the control and eradication of alien grasses should be done in accordance with the alien eradication programme in the EMPr to reduce unintended ecological impacts.

Residual impact	Residual impacts include loss of natural flora and suitable habitat due to encroachment of alien invasive species.
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**Impact Phase: Operation**

Nature of the impact: Potential fire impacts associated with the operational phase of the proposed development.

Description of Impact: Increased personnel on site increases the fire risk due to smoking and/or use of electrical equipment on site.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Probable
<b>Score</b>	1	3	3	3	3

**Impact Phase: Operation**

Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)	Low Negative Impact (30)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>No open fires should be permitted outside of designated areas.</li> <li>Smoking areas must be defined, and no smoking should be permitted outside of designated areas.</li> <li>An emergency response plan for uncontrolled fires must be in place prior to operation and implemented for the duration of the WEF's lifespan.</li> <li>All staff members must have a Fire and Safety induction to increase awareness.</li> </ul>		
Residual impact	Residual impacts include loss of flora SCC. This is why it is critical to manage unplanned fires as soon as possible to avoid mortality.	

**Impact Phase: Operation**

**Nature of the impact:** Potential floral mortality and loss of SCC impacts associated with the operational phase of the proposed development.

**Description of Impact:** Direct mortality/loss of flora species is anticipated due to increased traffic on site and illegal collection. Targeted illegal harvesting may pose a risk as the WEF may offer greater ease of access to the public.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probable
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
Significance Calculation	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- An environmental induction for all staff on site to identify SCC.

**Impact Phase: Operation**

- Demarcate sensitive areas, where SCC have been confirmed present near the development footprint as No-Go areas.
- Site access should be controlled, and no unauthorised persons should be allowed onto the site to limit illegal harvesting.
- The collection or harvesting of any plants at the site should be strictly forbidden.
- Establish a monitoring program to assess the effectiveness of mitigation measures and track changes in floral communities over time. Use the results of monitoring to inform adaptive management strategies and make adjustments as needed to minimize direct floral mortality and optimize conservation outcomes.

Residual impact	Residual impacts include loss flora SCC from the natural environment.
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**Impact Phase: Operation**

**Nature of the impact:** Potential soil erosion impacts associated with the operational phase of the proposed development.

**Description of Impact:** Soil erosion facilitated by clearing vegetation and increased road use promotes soil displacement and loss during the Operational Phase.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Irreversible	High	Highly Probably
<b>Score</b>	2	4	5	4	4
<b>With Mitigation</b>	Site	Medium term	Recoverable	Moderate	Low Probability
<b>Score</b>	1	3	3	3	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Utilize existing servitudes and access roads wherever possible, any new roads or the upgrading of roads should be minimized as far as possible and not be larger than required.
- All construction vehicles should adhere to clearly defined and demarcated roads, no off-road driving should be allowed.
- Ensure that sufficient erosion control measures are constructed on all servitudes and access roads in the project area, including where such crosses waterbodies.
- Rehabilitate existing servitude and access roads in the project area with sufficient erosion control measures to prevent the loss of soil and the degradation of vegetation.
- Construction activities in or near drainage lines, washes or temporary inundated depressions must only take place during the dry season.
- An environmental management programme (EMPr) must be implemented and must provide a detailed description of how construction activities must be conducted to avoid increased erosion.

**Impact Phase: Operation**

- Erosion management at the site should take place according to the Erosion Management Plan and Rehabilitation Plan included in the EMP.
- All roads and other hardened surfaces should have runoff control features which redirect water flow and dissipate energy in the water stream which may pose an erosion risk.
- Regular monitoring for erosion after construction to ensure that no erosion problems have developed as result of the disturbance during the operation of the project.

Residual impact	Residual impacts include changes to infiltration rates and loss of soil fertility.
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**10.6 AVIFAUNA**

The avifaunal community is comprised most importantly of raptors, cranes and bustards. All high-risk areas for birds have been avoided by placing turbines out of the high sensitivity and no-go areas and by placing buffers around nests in accordance with current Best Practice Guidelines. The potential impact to the avian community is provided for each proposed phase, i.e., construction, operation and decommission of the proposed development.

The following impacts are identified as the major impacts that are likely to be associated with the development of the Khoe WEF:

- Displacement of Priority species due to disturbance

**10.6.1 CONSTRUCTION PHASE****Impact Phase: Construction**

**Nature of the impact:** Displacement of Priority species due to disturbance

Description of Impact:

Generally negative due to displacement of Priority species due to disturbance associated with the construction of the wind turbines and associated infrastructure. No direct fatalities of birds expected during this phase. Generally short term (approx. 24 months)

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	Irreversible	High	Highly likely
<b>Score</b>	2	2	4	5	4
<b>With Mitigation</b>	Site	Short term	Reversible	Medim - High	Probable
<b>Score</b>	2	2	4	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (70)		Moderate – High Negative Impact (39)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

**Impact Phase: Construction**

## Mitigation for WEF site construction:

- Construction activity should be restricted to the immediate footprint of the infrastructure as far as possible and should avoid all sensitive areas (e.g., CRM-designated high-risk areas, wetlands).
- Measures to control noise and dust should be applied according to current best practice in the industry.
- Roads and tracks to avoid all identified sensitive areas wherever possible.
- An avifaunal walk-down should be conducted to confirm final layout and identify any sensitivities that may arise between the conclusion of the EIA process and the construction phase.

Residual impact	The disturbance of birds is somewhat inevitable by activities on site, although the most sensitive receptors (e.g., CRM-designated high-risk areas) have already been protected through avoidance, through the application of No-Go buffers. Post-construction monitoring recommended by Birdlife South Africa guidelines will help identify residual impacts should they occur and recommend further mitigations, if required.
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The following impacts are identified as the major impacts that are likely to be associated with the operation of the Khoe WEF:

- Bird Collision, habitat alteration and displacement

**10.6.2 OPERATION PHASE****Impact Phase: Operation**

**Nature of the impact:** Bird Collision, habitat alteration and displacement

## Description of Impact:

Generally negative due to potential for collision, habitat alteration and displacement, of five Red Data species or two Least Concern species through the operation of the turbines and activity on site

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Long term	Reversible	Highly	Highly likely
<b>Score</b>	1	4	4	5	5
<b>With Mitigation</b>	Site	Long term	Reversible	Moderate	Probable
<b>Score</b>	1	4	4	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (70)		Moderate - High (39)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

## Mitigation measures to reduce residual risk or enhance opportunities:

- Re-position all turbines that fall within the high-risk zones delineated by the CRM to lower risk areas (as also identified by the CRM).
- The high-risk No-Go zones delineated by the CRM should be adhered to (as depicted in this report).

**Impact Phase: Operation**

- A post-construction programme must be conducted by an avifaunal specialist (following the Birds and Renewable Energy Specialist Group guidelines) to:
  - (i) assess turbine-related fatalities; and
  - (ii) confirm that all mitigations have been appropriately adhered to and, in particular, that road and hard stand verges do not provide additional substrate for raptor prey species.

A bird fatality threshold and adaptive management policy must be designed by an ornithologist for the site, prior to construction. This policy should form an annexure of the operational EMP for the facility. Most importantly, this policy should identify the number of bird fatalities of Priority species which will trigger a management response, appropriate responses, and timelines for such responses. In general, it is recommended that should one Red Data species or two or more LC species be killed per turbine per year then those turbines will require further mitigation.

- Should the identified Priority bird species fatality thresholds be exceeded in Year 1 and 2, either (i) an automated turbine Shutdown on Demand (SDOD) programme must be immediately initiated; or
- (ii) appropriate alternative mitigation (e.g. striped blade, human-SDOD) must be implemented on site. The latter programme must consist of a suitably qualified, trained, and resourced team of observers present on site for all daylight hours 365 days of the year. This team must be stationed at vantage points (VPs) with full visible coverage of all turbine locations (typically 1 VP covering four turbines). The observers must detect incoming Priority bird species, track their flights, judge when they enter a turbine proximity threshold, and alert the control room to shut down the relevant turbine until the risk has passed. A full detailed method statement or protocol must be designed by an ornithologist.

Residual impact	Direct mortality through collision, or area avoidance, may occur if cranes, raptors, and bustards remain here and the mitigations are insufficient. This possibility can be gauged from a systematic monitoring programme. There is some uncertainty around the effectiveness of bird-turbine collision mitigation at this stage in South Africa. As a result, the significance remains as "Moderate" post mitigation. Note that these can be reduced with additional mitigations.
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**10.7 BATS**

**10.7.1 CONSTRUCTION PHASE**

The impact of the proposed Khoe WEF on bats in the area is discussed below. The potential impacts during the construction phase are summarised as:

- Clearing and excavation of natural habitat;
- Creating attractive bat habitat within the development terrain; and
- Disturbance of bats and bat roosts by construction noise, especially during night-time.

**Construction Phase**

**Nature of the impact:** Clearing and excavation of natural habitat

**Description of impact:** The destruction of features that could serve as potential roosts, such as rock formations and derelict aardvark holes, and the removal of trees or the fragmentation of woody habitat which includes dense bushes. The removal of limited trees and bushes would have also an impact on the foraging potential of clutter and clutter-edge-specific species.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Definite



Construction Phase					
<b>Score</b>	2	3	3	3	5
<b>With Mitigation</b>	Local	Short Term	Recoverable	Low	Probable
<b>Score</b>	2	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (55)		Low Negative Impact (27)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Apart from access roads and the management building, construction activities are to be kept out of all high bat-sensitive areas as far as possible.</li> <li>Rock formations occurring along the ridge lines should be avoided during construction, as these could serve as roosting space for bats.</li> <li>Destruction of limited trees should be avoided during construction.</li> <li>Care should be taken if any dense bushes are destroyed, to make sure that there are not bat roosts in the vegetation. If bat roosts are found, a bat specialist should be contacted immediately.</li> <li>Aardvark holes or any large derelict holes or excavations should not be destroyed before careful examination for bats.</li> <li>The ECO or a responsible appointed person or site manager should contact a bat specialist before construction commences so that they know what to look out for during construction.</li> </ul>					
Residual impact	Yes, natural habitat will be removed, but with rehabilitation a component of this could be replaced.				

Construction Phase					
<b>Nature of the impact:</b> Creating attractive bat habitat within the development terrain					
<b>Description of impact:</b> Creating new habitat amongst turbines which might attract bats. This includes buildings with roofs that could serve as roosting space or open water sources from quarries or excavation where water could accumulate.					
Impact Status: Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Highly probable
<b>Score</b>	2	3	3	3	4
<b>With Mitigation</b>	Site	Short Term	Reversible	Very Low	Low probable
<b>Score</b>	1	2	1	1	2
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		

Construction Phase	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (44)      Low Negative Impact (10)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Completely seal off roofs of new buildings (e.g., substations and site buildings). Note a small bat species could enter a hole the size of 1 cm<sup>2</sup>.</li> <li>• Roofs need to be regularly inspected during the lifetime of the wind farm and any new holes need to be sealed.</li> <li>• Excavation areas, quarries or any other artificial depressions should be filled and rehabilitated to avoid creating new areas of open water sources which could attract bats during rainy spells.</li> <li>• Inspect all existing buildings and infrastructure for possible roosting opportunities regularly, at least on a seasonal basis. If any holes are found, the ECO or operational bat specialist should be contacted to establish whether there are any bats in the roofs. If there is a roost in the roof, a bat specialist should be consulted.</li> </ul>	
Residual impact	No residual impact if mitigation measures are applied.

Construction Phase																															
<b>Nature of the impact:</b> Construction noise																															
<b>Description of impact:</b> Disturbance of bats and bat roosts by construction noise, especially during night-time.																															
Impact Status: Negative																															
	<table border="1"> <thead> <tr> <th></th> <th>Extent</th> <th>Duration</th> <th>Reversibility</th> <th>Magnitude</th> <th>Probability</th> </tr> </thead> <tbody> <tr> <td><b>Without Mitigation</b></td> <td>Local</td> <td>Short Term</td> <td>Reversible</td> <td>Low</td> <td>Definite</td> </tr> <tr> <td><b>Score</b></td> <td>2</td> <td>2</td> <td>1</td> <td>2</td> <td>5</td> </tr> <tr> <td><b>With Mitigation</b></td> <td>Site</td> <td>Short Term</td> <td>Reversible</td> <td>Very Low</td> <td>Definite</td> </tr> <tr> <td><b>Score</b></td> <td>1</td> <td>2</td> <td>1</td> <td>1</td> <td>5</td> </tr> </tbody> </table>		Extent	Duration	Reversibility	Magnitude	Probability	<b>Without Mitigation</b>	Local	Short Term	Reversible	Low	Definite	<b>Score</b>	2	2	1	2	5	<b>With Mitigation</b>	Site	Short Term	Reversible	Very Low	Definite	<b>Score</b>	1	2	1	1	5
	Extent	Duration	Reversibility	Magnitude	Probability																										
<b>Without Mitigation</b>	Local	Short Term	Reversible	Low	Definite																										
<b>Score</b>	2	2	1	2	5																										
<b>With Mitigation</b>	Site	Short Term	Reversible	Very Low	Definite																										
<b>Score</b>	1	2	1	1	5																										
<b>Significance Calculation</b>	Without Mitigation      With Mitigation																														
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (35)      Low Negative Impact (25)																														
Was public comment received?	No																														
Has public comment been included in mitigation measures?	No																														
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Noise levels should be prevented as far as possible.</li> <li>• Avoid night-time construction activities as much as possible.</li> </ul>																															
Residual impact	No residual impact if mitigation measures are applied.																														

### 10.7.2 OPERATIONAL PHASE

The impact of the proposed Khoe WEF on bats in the area is discussed below. The potential impacts during the operation phase are summarised as:

- Mortality due to direct collision or barotrauma of resident bats;
- Mortality due to direct collision or barotrauma of migrating bats;
- Loss of bats of conservation value;
- Fatality curiosity;
- Smaller genetic pool; and
- Foraging space lost due to the turning of turbine blades.

#### Operation Phase

**Nature of the impact:** Direct collision or barotrauma

**Description of impact:** Bat fatalities through direct collision, or barotrauma of resident bats occupying the airspace amongst the turbines. The turning blades of the turbines during operation are the most important aspect of the project that would impact negatively on bats.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long Term	Irreversible	High	Definite
<b>Score</b>	3	4	5	4	5
<b>With Mitigation</b>	Regional	Long Term	Recoverable	Moderate	Definite
<b>Score</b>	3	4	3	3	5
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (80)		High Negative Impact (65)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- All turbines and turbine components, including the rotor-swept zone, should be kept out of all high-sensitivity zones.
- Mitigation measures should be applied after testing and as soon as turbines start to turn.
- A bat specialist should be appointed before the turbines start to turn, and operational bat monitoring should start when all the turbines start to turn, for a minimum of two years, or as described by the latest South African bat guidelines.
- Mitigation should be discussed between the bat specialist and developer during the construction and operational phase. Mitigation measures should be applied.
- Except for compulsory lighting required in terms of civil aviation, artificial lighting should be minimised, especially bright lights. Lights should rather be turned downwards where possible. Turbine tower lights should be switched off when not in operation, if possible.

**Operation Phase**

- Two years of compulsory bat monitoring as per the latest South African Bat Assessment Association (SABAA) bat monitoring guidelines is recommended, but this might be extended, depending on the bat specialist.

Residual impact	Yes. The fatality of bats is irreversible, and it is expected that there will be a decline in the population of high-risk species, but with mitigation, the bat population will be able to survive and still be functional. The resource will not be damaged irreparably but will be altered.
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### Operation Phase

**Nature of the impact:** Fatality of migrating bats

**Description of impact:** A limited number of calls like that of Natal Long-fingered bat a migration species, had been recorded. Fruit bats on migration might also traverse the site. Limited research is available on the migration of bats in South Africa, and some of the bat species occurring on-site might also traverse the area during migration.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	National	Long term	Recoverable	Moderate	Probable
<b>Score</b>	4	4	3	3	3
<b>With Mitigation</b>	National	Long term	Recoverable	Low	Low probability
<b>Score</b>	4	4	3	2	2
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (42)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Care should be taken during post-construction monitoring to verify the activity of Natal Long-fingered bat, especially within the rotor swept area of the turbine blades. Carcasses should be identified to establish the fatality of this species.
- All turbines and turbine components, including the rotor swept zone, should be kept out of all high sensitivity zones.
- Mitigation measures should be applied as soon as the test period of turbines is completed, and the turbines start turning.
- A bat specialist should be appointed before the turbines start to turn and operational bat monitoring should start when all the turbines start to turn, for a minimum of two years, or as described by the latest South African bat guidelines.
- Mitigation should be discussed between the bat specialist and developer during the construction and operational phase. Mitigation measures should be applied.
- Except for compulsory lighting required in terms of civil aviation, artificial lighting should be minimised, especially bright lights. Lights should rather be turned downwards where possible. Turbine tower lights should be switched off when not in operation, if possible.
- Two years of compulsory bat monitoring as per the latest SABAA bat monitoring guidelines is recommended, but this might be extended, depending on the bat specialist.

Residual impact	Not expected due to the low number of migratory bats, but some of the fruit bats do not echolocate and one will only truly know the situation through carcass searches during the operational phase.
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### Operation Phase

**Nature of the impact:** Loss of bats of conservation value

**Description of the impact:** The endemic Long-tailed house bat (Medium to high risk of fatality) was recorded and Geoffroy's horseshoe bat (Low risk), although not recorded on site, might occur in the valley areas and protea veld with relatively denser vegetation.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	Moderate	Probable
<b>Score</b>	3	4	3	3	3
<b>With Mitigation</b>	Regional	Long term	Reversible	Low	Low probability
<b>Score</b>	3	4	1	2	2
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Refer to table above – same mitigation to be implemented</li> </ul>					
Residual impact	Not expected due to the low number of bats of conservation value that have been recorded, but one will only truly know the situation through carcass searches during the operational phase.				

### Operation Phase

**Nature of the impact:** Fatality curiosity

**Description of the impact:** Bat mortality due to the attraction of bats to wind turbines (Horn et al. 2008). Bats have been shown to sometimes be attracted to wind turbines out of curiosity or reasons still under investigation.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Recoverable	Moderate	Probable
<b>Score</b>	2	4	3	3	3
<b>With Mitigation</b>	Local	Long term	Reversible	Low	Probable
<b>Score</b>	2	4	1	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Low Negative Impact (28)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Except for compulsory lighting required in terms of civil aviation, artificial lighting should be minimized, especially bright lights. Lights should rather be turned downwards. Turbine tower lights should be switched off when not in operation, if possible.</li> <li>Little is known about this impact and mitigation could be adapted if more research becomes available.</li> </ul>					
Residual impact	With mitigation, it is not expected that there will be a residual impact.				

### Operation Phase

**Nature of the impact:** Smaller genetic pool

**Description of impact:** Reduction in the size, genetic diversity, resilience, and persistence of bat populations. Bats have low reproductive rates and populations are susceptible to reduction by fatalities other than natural death. Furthermore, smaller bat populations are more susceptible to genetic inbreeding.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	Moderate	Highly probable
<b>Score</b>	3	4	3	3	4
<b>With Mitigation</b>	Regional	Long term	Recoverable	Low	Probable
<b>Score</b>	3	4	3	2	3
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (52)		Moderate Negative Impact (36)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Refer to mitigation measures under direct collision</li> </ul>					
Residual impact	Would the genetic pool be reduced due to high fatality resulting from the wind farm, it will depend on the severity of the influence, and it might take decades to recover.				



**Operation Phase**

**Nature of the impact:** Foraging space lost due to the turning of turbine blades

**Description of impact:** Loss of habitat and foraging space during operation of the wind turbines

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	High	Definite
<b>Score</b>	3	4	3	4	5
<b>With Mitigation</b>	Regional	Long term	Reversible	Moderate	Definite
<b>Score</b>	3	4	1	3	5
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (70)		Moderate Negative Impact (55)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Refer to Fatality of migrating bats for mitigation measures</li> </ul>					
Residual impact	No, if turbines are decommissioned, the foraging space will be available to bats again.				

### 10.7.3 DECOMMISSIONING PHASE

The impact of the proposed Khoe WEF on bats in the area is discussed below. The potential impacts during the Decommissioning phase are summarised as:

- Disturbance due to decommissioning activities.

### Decommissioning Phase

**Nature of the impact:** Decommissioning activities

**Description of impact:** Decommissioning activities at the end of the wind farm's lifespan

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short term	Recoverable	Moderate	Definite
<b>Score</b>	1	2	2	3	5
<b>With Mitigation</b>	Local	Short term	Reversible	Low	Definite
<b>Score</b>	1	2	1	2	5
<b>Significance Calculation</b>	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (40)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Artificial lighting during decommissioning should be minimized as much as possible, especially bright lights or spotlights. Lights should avoid skyward illumination.</li> <li>Night-time decommissioning activities should be avoided as far as possible.</li> </ul>					
Residual impact	If mitigation measures are followed there should be no residual impact.				

## 10.8 HERITAGE AND ARCHAEOLOGY

During the construction of the WEF, the following activities may result in physical impacts to the landscape and to heritage resources that lie in or on it:

- Excavations to construct the foundations for WTGs and other WEF infrastructure;
- Leveling of ground for WTG and other laydown areas;
- Construction of roads or tracks to service the installation of the WTGs and their longer-term maintenance during operation; and
- Introduction of vehicles, machinery and people into environment.

The introduction of semi-industrial features to the area can have an impact on the cultural landscape.

### 10.8.1 CONSTRUCTION, OPERATION AND DECOMMISSIONING PHASE

From the information collected for the HIA, indications are that impacts to pre-colonial archaeological sites and material are unlikely or will be very limited.

Significant impacts on archaeological resources during the construction, operational and decommissioning phases of the Khoe WEF are thus not anticipated.

**Impact Phase: Construction**

**Nature of the impact:** Disturbance or destruction of archaeological sites and/or materials

**Description of Impact:**

Disturbance or destruction of archaeological sites and/or materials resulting from earthworks and excavations associated with the WEF. This includes:

- Excavations to construct the foundations for WTGs and other WEF infrastructure;
- Leveling of ground for WTG, laydown areas and the substation; and
- Construction of roads or tracks to service the installation of the WTGs and their longer-term maintenance during operation.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Permanent	Irreversible	Low	Low Probability
<b>Score</b>	2	3	5	2	2
<b>With Mitigation</b>	Local	Permanent	Irreversible	Very Low	Low Probability
<b>Score</b>	2	3	5	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)		Low Negative Impact (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• A pre-construction archaeological walkdown survey of the final WEF layout is recommended.</li> <li>• Any archaeological sites or material encountered during construction activities must be reported to the ECO by contractors, and HWC must be notified of HWC of any such discovery by the ECO so that the find can be assessed, and arrangements made to mitigate it, if necessary.</li> </ul>					
Residual impact	If mitigation measures are followed there should be no residual impact.				

**Construction, Operation and Decommissioning**

**Nature of the impact:** Disruption of the cultural landscape due to the presence of construction equipment and activity

**Description of Impact:**

Disruptions to views and sense of place resulting from the construction activities, and the introduction of WEF infrastructure into the landscape.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long-term	Irreversible	High	Definite
<b>Score</b>	2	4	5	4	5

Construction, Operation and Decommissioning					
<b>With Mitigation</b>	Local	Long-term	Recoverable	Moderate	Definite
<b>Score</b>	2	4	3	3	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (75)		Moderate Negative Impact (60)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk:					
<ul style="list-style-type: none"> <li>Keep the construction duration as short as possible and as much of the activity as possible out of the public view.</li> <li>In particular the infrastructure area(s) should be screened if possible, and noise and light pollution kept to a minimum.</li> </ul>					
Residual impact	The implementation of mitigation measures will reduce residual impacts.				

## 10.9 PALEONTOLOGY

### 10.9.1 CONSTRUCTION PHASE

Construction Phase					
<b>Nature of the impact:</b> Disturbance or destruction of fossil material					
<b>Description of Impact:</b> Disturbance or destruction of palaeontological material resulting from earthworks and excavations associated with the construction of the WEF, particularly (but not exclusively) excavations for foundations for WTGs.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Permanent	Irreversible	Low	Low Probability
<b>Score</b>	2	3	5	2	2
<b>With Mitigation</b>	Local	Permanent	Irreversible	Very Low	Low Probability
<b>Score</b>	2	3	5	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (22)		Low Negative Impact (22)		
Was public comment received?	No				

### Construction Phase

Has public comment been included in mitigation measures? No

Mitigation measures to reduce risk or enhance opportunities:

- The EAP and ECO must be informed of the very high palaeontological significance of the WEF area;
- The Fossil Chance Find Protocol contained in the PIA, which is designed to record all unexpected fossils associated with the geological formations on site must:
  - be implemented during the construction WEF, and
  - be included as part of the EMPr for this project.
- If fossils are exposed during construction they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach; and
- Recommendations contained in the PIA must be approved by HWC for inclusion in the EMPr for the project.

Residual impact Provided the mitigation measures have been implemented there will be no residual impacts.

## 10.10 VISUAL/LANDSCAPE

### 10.10.1 CONSTRUCTION

During the construction period it is expected that any visual impact of concern on sensitive visual receptors within the study area will be temporary and limited to a short-term period (2-5 years). The below direct construction visual impacts of the proposed Khoe Wind Energy Facility are assessed as follows:

### Construction Phase

**Nature of the impact:** Visual impact of construction activities on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF.

**Description of Impact:**

During the construction period, there will be an increase in heavy vehicles utilising the roads to the construction sites that may cause, at the very least, a visual nuisance to landowners in the area within 5km from the proposed site. Additionally, dust as a result of the construction activities and construction equipment (i.e. cranes), temporary laydown areas, construction camps, etc. may also be visible at the site, resulting in a visual impact occurring during construction. Sensitive receptors in this zone consist of residents of various homesteads such as Oumur, Leeuhok as well as tourist accommodation offerings (Middelberg, Ezelszacht, Exemia PNR, Leeuwenboschfontein, Drie Kuilen PNR)

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Short term	Reversible	Very high	Definite
<b>Score</b>	4	2	1	10	5
<b>With Mitigation</b>	Very Short distance	Short term	Reversible	High	Highly Probable
<b>Score</b>	4	2	1	8	4

Construction Phase		
Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	<b>Very High Negative Impact (85)</b>	<b>High Negative Impact (64)</b>
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce risk or enhance opportunities: <u>Planning:</u>		
<ul style="list-style-type: none"> <li>Retain and maintain natural vegetation in all areas outside of the development footprint, but within the project site.</li> </ul>		
<u>Construction:</u>		
<ul style="list-style-type: none"> <li>Ensure that vegetation is not unnecessarily removed during the construction period.</li> <li>Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) where possible.</li> <li>Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.</li> <li>Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed of regularly at licensed waste facilities.</li> <li>Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).</li> <li>Restrict construction activities to daylight hours whenever possible in order to reduce lighting impacts.</li> <li>Rehabilitate all disturbed areas immediately after the completion of construction works.</li> </ul>		
<b>Residual impact</b>	None, provided that rehabilitation works are carried out as required.	

Construction Phase					
<b>Nature of the impact:</b> Nature of the impact: Visual impact of construction activities on observers travelling along roads within 5 km of the proposed WEF.					
<b>Description of Impact:</b> During the construction period, there will be an increase in heavy vehicles utilising the roads to the construction sites that may cause, at the very least, a visual nuisance to other road users and in the area within 5km from the proposed site. Additionally, dust as a result of the construction activities and construction equipment (i.e. cranes), temporary laydown areas, construction camps, etc. may also be visible at the site, resulting in a visual impact occurring during construction. Sensitive receptors in this zone consist of observers travelling along the R318 which cuts through the site and the N1 located to the north.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Short term	Reversible	Very high	Highly Probable
<b>Score</b>	4	2	1	10	4

Construction Phase					
With Mitigation	Very Short distance	Short term	Reversible	High	Probable
<b>Score</b>	4	2	1	8	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (60)			Moderate Negative Impact (42)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain and maintain natural vegetation in all areas outside of the development footprint, but within the project site.</li> </ul>					
<u>Construction:</u>					
<ul style="list-style-type: none"> <li>Ensure that vegetation is not unnecessarily removed during the construction period.</li> <li>Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e. in already disturbed areas) where possible.</li> <li>Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.</li> <li>Ensure that rubble, litter, and disused construction materials are appropriately stored (if not removed daily) and then disposed of regularly at licensed waste facilities.</li> <li>Reduce and control construction dust using approved dust suppression techniques as and when required (i.e. whenever dust becomes apparent).</li> <li>Restrict construction activities to daylight hours whenever possible in order to reduce lighting impacts.</li> <li>Rehabilitate all disturbed areas immediately after the completion of construction works.</li> </ul>					
Residual impact	None, provided that rehabilitation works are carried out as required.				

### 10.10.2 OPERATIONAL

During the operational phase of the proposed Khoe Wind Energy Facility, it is generally accepted that the wind turbine structures associated with the proposed facility will constitute the largest visual impact of concern on sensitive visual receptors within the study area, as a result of their sheer scale in relation to other proposed infrastructure that may be located on the site. The below direct operational visual impacts of the proposed Khoe Wind Energy Facility are assessed as follows:

#### Operational Phase

**Nature of the impact:** Visual impact on residents of homesteads and visitors to tourist accommodation within 5 km to the proposed WEF.

### Operational Phase

**Description of Impact:** The operation of the Khoe Wind Energy Facility is expected to have a very high visual impact (significance rating = 90) on observers/visitors residing at homesteads and tourist accommodation facilities within a 5km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (90)		Very High Negative Impact (90)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>					
<u>Operations:</u>					
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>					
<u>Decommissioning:</u>					
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.</li> </ul>					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

### Operational Phase

**Nature of the impact:** Visual impact on observers travelling along the roads within 5 km to the proposed WEF.

**Description of Impact:** During the entire operational lifespan of the Khoe Wind Energy Facility, it is expected that daily commuters and possible tourists travelling along the various roads within 5km of the wind turbine structures may be negatively impacted upon by the visual exposure to the proposed infrastructure, however brief. It is assumed that the observers travelling along these roads will view the visual intrusion of the turbines in a negative light when compared with the rural and scenic quality of the surrounding landscape.



### Operational Phase

The operation of the Khoe Wind Energy Facility is expected to have a **high** visual impact on observers traveling along the roads within a 5km radius of the wind turbine structures. This includes observers travelling along the R318 and secondary road to the east.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (80)		High Negative Impact (80)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact on visitors to formally protected areas within 5-10 km to the proposed WEF.

**Description of Impact:**

The Khoe Wind Energy Facility could have a very high visual impact on visitors/ tourists to the Drie Kuilen Private Nature Reserve, a formally protected area as well as the following informal/conservation areas: Proposed Exemia PNR located within a 5 km radius of the wind turbine structures.

**Impact Status:** Negative

Operational Phase					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	4	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (95)		Very High Negative Impact (95)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>					
<u>Operations:</u>					
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>					
<u>Decommissioning:</u>					
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications</li> </ul>					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

### Operational Phase

**Nature of the impact:** Visual impact on residents of homesteads and visitors to tourist accommodation within 5-10 km to the proposed WEF.

**Description of Impact:**

The Khoe Wind Energy Facility could have a very high visual impact on residents of (or visitors to) homesteads and tourist accommodation within a 5 - 10km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	3	4	1	10	5

Operational Phase					
<b>With Mitigation</b>	Short distance	Long term	Reversible	Very high	Definite
<b>Score</b>	3	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (88)		Very High Negative Impact (88)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce risk or enhance opportunities:					
<u>Planning:</u>					
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>					
<u>Operations:</u>					
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>					
<u>Decommissioning:</u>					
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications</li> </ul>					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				

Operational Phase					
<b>Nature of the impact:</b> Visual impact on observers travelling along roads within 5-10 km to the proposed WEF.					
<b>Description of Impact:</b> Visual impact of the proposed wind turbine structures on observers travelling along roads within 5 – 10km of the proposed WEF					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short distance	Long term	Reversible	High	Definite
<b>Score</b>	3	4	1	8	5
<b>With Mitigation</b>	Short distance	Long term	Reversible	High	Definite
<b>Score</b>	3	4	1	8	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (72)		High Negative Impact (72)		

**Operational Phase**

Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to reduce risk or enhance opportunities: <u>Planning:</u>	
<ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.</li> </ul>	
<u>Operations:</u>	
<ul style="list-style-type: none"> <li>Maintain the general appearance of the facility as a whole.</li> </ul>	
<u>Decommissioning:</u>	
<ul style="list-style-type: none"> <li>Remove infrastructure not required for the post-decommissioning use.</li> <li>Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications</li> </ul>	
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.

**Operational Phase**

**Nature of the impact:** Visual impact on residents of homesteads and visitors to tourist accommodation within 10-20 km to the proposed WEF.

**Description of Impact:** The Khoe Wind Energy Facility could have a moderate visual impact on residents of (or visitors to) homesteads/tourist accommodation within a 10 - 20km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	8	4
<b>With Mitigation</b>	Medium distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	2	4	1	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (56)		Moderate Negative Impact (56)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

### Operational Phase

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact on observers travelling along roads within 10-20 km to the proposed WEF.

**Description of Impact:**

The Khoe Wind Energy Facility could have a moderate visual impact (significance rating = 39) on observers travelling along roads within a 10 - 20km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>With Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Moderate Negative Impact (39)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

### Operational Phase

- Maintain the general appearance of the facility as a whole.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact on visitors to formally protected areas and private nature reserves within 10-20 km to the proposed WEF.

#### Description of Impact:

The Khoe Wind Energy Facility could have a **moderate** visual impact on visitors/ tourists to the Cape Floral Protected area in the south east (formally protected area a), located within a 10 - 20km radius of the wind turbine structures.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>With Mitigation</b>	Medium distance	Long term	Reversible	High	Probable
<b>Score</b>	2	4	1	8	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (45)		Moderate Negative Impact (45)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

#### Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

#### Operations:

- Maintain the general appearance of the facility as a whole.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

### Operational Phase

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact of shadow flicker on sensitive visual receptors in close proximity to the proposed WEF.

**Description of Impact:**

Shadow flicker only occurs when the sky is clear, and when the turbine rotor blades are between the sun and the receptor (i.e. when the sun is low). De Gryse in Scenic Landscape Architecture (2006) found that "most shadow impact is associated with 3-4 times the height of the object". Based on this research, a 1km buffer along the edge of the outer most turbines were identified as the zone within which there is a risk of shadow flicker occurring.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	Moderate	Probable
<b>Score</b>	4	4	1	6	3
<b>With Mitigation</b>	Medium distance	Long term	Reversible	Moderate	Probable
<b>Score</b>	2	4	1	6	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (48)		Moderate Negative Impact (48)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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## Operational Phase

**Nature of the impact:** Visual impact of lighting at night on residents and visitors to homesteads and tourist accommodation within 10 km from the proposed WEF

**Description of Impact:** The area immediately surrounding the proposed facility has a relatively low incidence of receptors and light sources, so light trespass and glare from the security and after-hours operational lighting for the facility will have some significance for visual receptors in the study area, especially those located in closer proximity to the wind turbine structures especially within 0-5km and potentially up to 20km.

Another source of glare light, albeit not as intense as flood lighting, is the aircraft warning lights mounted on top of the hub of the wind turbines. These lights are less aggravating due to the toned-down red colour, but have the potential to be visible from a great distance. This is especially true due to the strobing effect of the lights, a function specifically designed to attract the observer's attention. The CAA prescribes these warning lights and the potential to mitigate their visual impacts have traditionally been very low other than to restrict the number of lights to turbines that delineate the outer perimeter of the facility.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short to medium distance	Long term	Reversible	Very High	Definite
<b>Score</b>	3	4	1	10	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	3	4	1	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (88)		High Negative Impact (66)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning & operation:

- Implement needs-based night lighting if considered acceptable by the CAA.
- Limit aircraft warning lights to the turbines on the perimeter according to CAA requirements, thereby reducing the overall impact.
- Shield the sources of light by physical barriers (walls, vegetation, or the structure itself).
- Limit mounting heights of lighting fixtures, or alternatively use foot-lights or bollard level lights.
- Make use of minimum lumen or wattage in fixtures.
- Make use of down-lighters, or shielded fixtures.
- Make use of Low-Pressure Sodium lighting or other types of low impact lighting.
- Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.



### Operational Phase

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain
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### Operational Phase

**Nature of the impact:** Visual impact of lighting at night on observers travelling along roads within 10 km from the proposed WEF

**Description of Impact:**

The area immediately surrounding the proposed facility has a relatively low incidence of receptors and light sources, so light trespass and glare from the security and after-hours operational lighting for the facility will have some significance for visual receptors in the study area, especially those located in closer proximity to the wind turbine structures especially within 0-5km and potentially up to 20km. Another source of glare light, albeit not as intense as flood lighting, is the aircraft warning lights mounted on top of the hub of the wind turbines. These lights are less aggravating due to the toned-down red colour, but have the potential to be visible from a great distance. This is especially true due to the strobing effect of the lights, a function specifically designed to attract the observer's attention. The CAA prescribes these warning lights and the potential to mitigate their visual impacts have traditionally been very low other than to restrict the number of lights to turbines that delineate the outer perimeter of the facility.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Short to medium distance	Long term	Reversible	High	Definite
<b>Score</b>	3	4	1	8	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	3	4	1	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (78)		Moderate Negative Impact (58)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

**Planning & operation:**

- Implement needs-based night lighting if considered acceptable by the CAA.
- Limit aircraft warning lights to the turbines on the perimeter according to CAA requirements, thereby reducing the overall impact.
- Shield the sources of light by physical barriers (walls, vegetation, or the structure itself).
- Limit mounting heights of lighting fixtures, or alternatively use foot-lights or bollard level lights.
- Make use of minimum lumen or wattage in fixtures.
- Make use of down-lighters, or shielded fixtures.

**Operational Phase**

- Make use of Low-Pressure Sodium lighting or other types of low impact lighting.
- Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain
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**Operational Phase**

**Nature of the impact:** Visual impact of the ancillary infrastructure on observers in close proximity to the structures.

**Description of Impact:**

On-site ancillary infrastructure associated with the WEF includes a 132kV substation and collector substation, BESS, underground cabling between the wind turbines, internal access roads, gate house, Operation and Maintenance buildings. No dedicated viewshed analyses have been generated for the ancillary infrastructure, as the range of visual exposure will fall within (and be overshadowed by) that of the turbines.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	High	Highly Probable
<b>Score</b>	4	4	1	8	4
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Moderate	Probable
<b>Score</b>	4	4	1	6	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (68)		Moderate Negative Impact (48)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the infrastructure.



### Operational Phase

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Visual impact of the ancillary infrastructure on observers in close proximity to the structures travelling along the R318.

#### Description of Impact:

On-site ancillary infrastructure associated with the WEF includes a 132kV substation and collector substation, BESS, underground cabling between the wind turbines, internal access roads, gate house, Operation and Maintenance buildings. No dedicated viewshed analyses have been generated for the ancillary infrastructure, as the range of visual exposure will fall within (and be overshadowed by) that of the turbines.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Very Short distance	Long term	Reversible	High	Definite
<b>Score</b>	4	4	1	8	5
<b>With Mitigation</b>	Very Short distance	Long term	Reversible	Moderate	Highly Probable
<b>Score</b>	4	4	1	6	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (75)		Moderate Negative Impact (56)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

#### Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

#### Operations:

- Maintain the general appearance of the infrastructure.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

### Operational Phase

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** The potential impact on the sense of place of the region.

**Description of Impact:**

Sense of place refers to a unique experience of an environment by a user, based on his or her cognitive experience of the place. Visual criteria, specifically the visual character of an area (informed by a combination of aspects such as topography, level of development, vegetation, noteworthy features, cultural / historical features, etc.), play a significant role.

An impact on the sense of place is one that alters the visual landscape to such an extent that the user experiences the environment differently, and more specifically, in a less appealing or less positive light.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>With Mitigation</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (82)		Very High Negative Impact (82)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the infrastructure.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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## 10.11 NOISE

Increased noise levels are directly linked with the various activities associated with the construction of the proposed development, as well as the operation phase of the activity. In South Africa the document that addresses the issues concerning environmental noise is SANS 10103. It provides the maximum average ambient noise levels,  $L_{Req,d}$  and  $L_{Req,n}$ , during the day and night respectively to which different types of developments may be exposed. For rural areas the Zone Sound Levels (Rating Levels) are:

- Day (06:00 to 22:00) -  $L_{Req,d} = 45$  dBA, and
- Night (22:00 to 06:00) -  $L_{Req,n} = 35$  dBA.

### 10.11.1 CONSTRUCTION PHASE

There are several factors that determine the audibility, as well as the potential of a noise impact on receptors. Maximum noises generated can be audible over a large distance, however, these maximum noises are generally of very short duration. If noise level exceeds the prevailing ambient sound level with more than 7 dBA, the noise can increase annoyance levels and may ultimately result in noise complaints. Average or equivalent sound levels are another factor that impacts on the ambient sound levels and is the constant sound level that the receptor can experience.

A potential significant source of noise during the construction phase is additional traffic to and from the site, as well as traffic on the site. The use of a borrow pit(s), on site crushing and screening and concrete batching plants will significantly reduce heavy vehicle movement to and from the site. Construction traffic is expected to be generated throughout the entire construction period, expected to take approximately 18 – 24 months, however, the volume and type of traffic generated will be dependent upon the construction activities being conducted, which will vary during the construction period. Noise levels due to traffic can be estimated using various different noise algorithms.

**Impact Phase:** Construction Phase

**Nature of the impact:** Construction activities of access roads

**Description of Impact:** Daytime ambient sound levels could range from less than 20 dBA to more than 75 dBA, averaging at 43.7 dBA (for the six measurement locations). Daytime ambient sound levels are thus typical of a rural noise district. Construction noises might be audible over large distances during quiet periods (during low wind conditions). NSR K-6, K-7, K-8, K-13, K-15 and K-16 (worst-case noise level of 74.5 (K-14) to 34.5 dBA (K-3))

Daytime construction activities should not change the existing rating levels, with this report recommending a daytime noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR in Volume II, Appendix E, Table 2 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Temporary	High	High - Very High	Likely
<b>Score</b>	2	1		8	3

Impact Phase: Construction Phase					
<b>With Mitigation</b>	Local	Temporary	High	High - Very High	Possible
<b>Score</b>	2	1		8	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Low Negative Impact (24)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to enhance opportunities:					
<ul style="list-style-type: none"> <li>The applicant can discuss the potential noise levels with NSR K-6, K-7, K-8, K-13, K-15 and K-16, highlighting the temporary nature of the noise impact; and/or</li> <li>The applicant can plan for construction activities past NSR K-6, K-7, K-8, K-13, K-15 and K-16 when the dwellings are not used for residential purposes (residents at school or working).</li> </ul>					
Residual impact	None				

Impact Phase: Construction Phase					
<b>Nature of the impact:</b> Construction traffic passing NSR					
<b>Description of Impact:</b> Daytime ambient sound levels could range from less than 20 dBA to more than 75 dBA, averaging at 43.7 dBA (for the six measurement locations). Daytime ambient sound levels are thus typical of a rural noise district. Construction noises might be audible over large distances during quiet periods (during low wind conditions). NSR K-7, K-8 and K-15 (worst-case noise level of 54.0 (K-14) to 34.0 dBA (K-3)).					
Daytime construction activities should not change the existing rating levels, with this report recommending a daytime noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR in Volume II, Appendix E, Table 2 and summarized below.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short-term	High	High - Very High	Likely
<b>Score</b>	2	2		8	3
<b>With Mitigation</b>	Local	Short-term	High	High - Very High	Possible
<b>Score</b>	2	2		8	2

Impact Phase: Construction Phase		
Significance Calculation	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (42)	Low Negative Impact (28)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to enhance opportunities: <ul style="list-style-type: none"> <li>The applicant can discuss the potential noise levels with NSR K-7, K-8 and K-15, highlighting the projected worst-case noise levels; and/or</li> <li>The applicant can plan for activities past NSR K-7, K-8 and K-15 when the dwellings are not used for residential purposes (residents at school or working); and/or</li> <li>Active noise monitoring during construction activities (noise levels and the opinion of the NSR about the noise level; and/or</li> <li>The potential temporary relocation of NSR if noise monitoring indicates high annoyance levels with the construction traffic noise levels; and/or</li> <li>The inclusion of noise as an environmental theme as part of the induction training to employees and contractors, highlighting the potential impact on the identified NSR.</li> </ul>		
Residual impact	None	

**Impact Phase: Construction Phase**

**Nature of the impact:** Numerous simultaneous future construction activities during the day

**Description of Impact:** Daytime ambient sound levels could range from less than 20 dBA to more than 75 dBA, averaging at 43.7 dBA (for the six measurement locations). Daytime ambient sound levels are thus typical of a rural noise district. Construction noises might be audible over large distances during quiet periods (during low wind conditions). All NSR (worst-case noise level of 49.6 (K-14) to 20.7 dBA (K-26)).

Daytime construction activities should not change the existing rating levels, with this report recommending a daytime noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR in Volume II, Appendix E, Table 2 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short term	High	Low (4) or less	Possible
<b>Score</b>	2	2		4	2
<b>With Mitigation</b>	Local	Short term	High	Low (4) or less	Possible
<b>Score</b>	2	2		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		



<b>Impact Phase: Construction Phase</b>	
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (20)      Low Negative Impact (20)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
The potential significance of the noise impact is low and no specific mitigation measures are required for typical daytime construction activities.	
Residual impact	None

<b>Impact Phase: Construction Phase</b>					
<b>Nature of the impact:</b> Numerous simultaneous future construction activities at night					
<b>Description of Impact:</b> Night-time ambient sound levels could range from less than 20 to more than 75 dBA, averaging at 33.1 dBA (for the six measurement locations). Night-time ambient sound levels are typical of a rural noise district and introduced noises could be clearly audible during quiet periods (during no or low wind conditions). NSR K-6, K-7, K-8, K-9, K-10, K11, K-15 and potentially K-12 (worst-case noise level of 49.6 (K-14) to 20.7 dBA (K-26)).					
Night-time construction activities should not change the existing ambient sound levels, with this report recommending a night-time noise limit of 52 dBA. The projected noise levels, the change in ambient sound levels as well as the potential noise impact is defined per NSR.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Short Term	High	High - Very High	Likely
<b>Score</b>	3	2		8	3
<b>With Mitigation</b>	Regional	Short Term	High	High	Possible
<b>Score</b>	3	2		8	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (45)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to enhance opportunities:					



**Impact Phase: Construction Phase**

- Plan construction schedule that such simultaneous activities are only required at one WTG location (WTG located within 1,500m from an NSR). Other simultaneous construction activities can continue, but should take place further than 1,500m from NSR;
- Warning NSR of when construction activities may take place at night; and
- Minimise active equipment at night, planning the completion of noisiest activities (such a pile driving, rock breaking and excavation) during the daytime period.

Residual impact	None
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**10.11.2 OPERATIONAL PHASE****Impact Phase: Operation Phase**

**Nature of the impact:** Numerous WTG operating simultaneously at Khoe WEF

**Description of Impact:** WTG will only operate during period with increased winds, when ambient sound levels could be higher than periods with no or low winds. This assessment recommends a daytime upper noise limit of 52 dBA. (worst-case noise level of 47.7 (K-14) to 34.1 dBA (K-17)).

The projected noise levels and the change in ambient sound levels is defined for the identified NSR in Volume II, Appendix E, Table 6 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	High	Low	Possible
<b>Score</b>	2	4		4	2
<b>With Mitigation</b>	Local	Long Term	High	Low	Possible
<b>Score</b>	2	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (20)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

- The potential significance for daytime operational activities is low and additional mitigation are not required or recommended for daytime operational activities

Residual impact	None
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### Impact Phase: Operation Phase

**Nature of the impact:** Numerous WTG operating simultaneously at Khoe WEF

**Description of Impact:** WTG will only operate during period with increased winds, when ambient sound levels could be higher than periods with no or low winds. This assessment recommends a daytime upper noise limit of 52 dBA. Ambient sound levels will likely be higher, with this assessment assuming an ambient sound level of 41.5 dBA (though ambient sound level measurements indicate that actual ambient sound levels may be higher) at a wind speed of 8 m/s (at a height of 10m). NSR K-6, K-7, K-8, K-9, K-10 and K-11 (worst-case noise level of 47.7 (K-14) to 34.1 dBA (K-17)).

The projected noise levels and the change in ambient sound levels is defined for the identified NSR in Volume II, Appendix E, Table 6 and summarized below.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	High	Moderate	Likely
<b>Score</b>	3	4		6	3
<b>With Mitigation</b>	Regional	Long term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Low Negative Impact (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
	<ul style="list-style-type: none"> <li>The use of STE on the blades of the two WTG located closer than 1,000m from NSR K-7, K-8, K-9, K-10 and K-11; or</li> <li>Noise monitoring and the design and implementation of a noise abatement programme (requiring the operation of certain WTG during certain conditions in a reduced noise mode). This however will require the selection of a WTG that offer the use of a reduced noise emission mode.</li> </ul>				
Residual impact	None				

## 10.12 SOCIO-ECONOMIC

### 10.12.1 CONSTRUCTION PHASE

#### POTENTIAL POSITIVE IMPACTS

- Creation of employment and business opportunities, and opportunity for skills development and on-site training.

#### POTENTIAL NEGATIVE IMPACTS

- Impacts associated with the presence of construction workers on local communities.

- Impacts related to the potential influx of jobseekers.
- Increased risks to livestock and farming infrastructure associated with the construction related activities and presence of construction workers on the site.
- Increased risk of grass fires associated with construction related activities.
- Nuisance impacts, such as noise, dust, and safety, associated with construction related activities and vehicles.
- Impact on productive farmland.

**Construction Phase**

**Nature of the impact:** Creation of employment and business opportunities

**Description of Impact:**

The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities that will benefit members from the local communities in the area, including De Doorns and Touws River. These opportunities will include opportunities for low, semi and highly workers. Most of the employment opportunities will accrue to Historically Disadvantaged (HD) members of the community. A percentage of the wage bill will be spent in the local economy which will also create opportunities for local businesses in the local towns in the area. Given relatively high local unemployment levels and limited job opportunities in the area, this will represent a significant, if localised, social benefit. The total wage bill will be in the region of R 30 million (2024 Rand values). A percentage of the wage bill will be spent in the local economy which will also create opportunities for local businesses in the local towns in the area.

**Impact Status:** Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local - Regional	Short Term	n/a	Moderate	Probable
<b>Score</b>	2	2	0	6	3
<b>With Mitigation / Enhancement</b>	Local - Regional	Short Term	n/a	Moderate	Highly probable
<b>Score</b>	3	2	0	6	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Positive Impact (30)		Moderate Positive Impact (44)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

**Employment**

- Preparation and implementation of a Stakeholder Engagement Plan (SEP) prior to and during the construction phase.
- Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, most skilled posts are likely to be filled by people from outside the area.

### Construction Phase

- Where feasible, efforts should be made to employ local contactors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria.
- Before the construction phase commences the proponent should meet with representatives from the LM to establish the existence of a skills database for the area. If such a database exists, it should be made available to the contractors appointed for the construction phase.
- The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that the proponent intends following for the construction phase of the project.
- Where feasible, training and skills development programmes for locals should be initiated prior to the initiation of the construction phase.
- The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.

### Business

- The proponent should liaise with the local municipality with regards the establishment of a database of local companies, specifically BBBEE companies, which qualify as potential service providers (e.g., construction companies, catering companies, waste collection companies, security companies etc.) prior to the commencement of the tender process for construction service providers. These companies should be notified of the tender process and invited to bid for project-related work.

Note that while preference to local employees and companies is recommended, it is recognised that a competitive tender process may not guarantee the employment of local labour for the construction phase.

Residual impact	Improved pool of skills and experience in the local area.
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### Construction Phase

**Nature of the impact:** Potential impacts on family structures and social networks associated with the presence of construction workers

#### Description of Impact:

- The presence of construction workers poses a potential risk to family structures and social networks. While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on local communities. The most significant negative impact is associated with the disruption of existing family structures and social networks. This risk is linked to potentially risky behaviour, mainly of male construction workers, including:
  - An increase in alcohol and drug use.
  - An increase in crime levels.
  - The loss of girlfriends and/or wives to construction workers.
  - An increase in teenage and unwanted pregnancies.
  - An increase in prostitution.
  - An increase in sexually transmitted diseases (STDs), including HIV.

Workers are likely to be accommodated in nearby towns of Touws River and De Doorns. As indicated above, the objective will be to source as many of the low and semi-skilled workers locally. These workers will be from the local community and form part of the local family and social networks. This will reduce the risk and mitigate the potential impacts on the local community. However, as indicated above, the availability of suitably qualified workers in the area is likely to be limited. There is therefore likely to be a need to use construction workers from outside the area. Accommodating these workers in Touws River and De Doorns will pose a potential risk to the local community.

### Construction Phase

While the risks associated with construction workers at a community level are likely to be low with mitigation, at an individual and family level they may be significant, especially in the case of contracting a sexually transmitted disease or an unplanned pregnancy. However, given the nature of construction projects, it is not possible to totally avoid these potential impacts at an individual or family level.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Moderate	Probable
<b>Score</b>	2	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Moderate	Probable
<b>Score</b>	1	2	n/a	4	3
<b>Significance Calculation</b>					
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (30)		Low Negative Impact (21)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- The proponent, in consultation with the local municipality should investigate the option of establishing a Monitoring Committee (MC) to monitor and identify potential problems that may arise during the construction phase.
- Preparation and implementation of a SEP prior to and during the construction phase.
- Preparation and implementation of a Community Health, Safety and Security Plan (CHSSP) prior to and during the construction phase.
- The SEP and CHSSP should include a Grievance Mechanism that enables stakeholders to report and resolve incidents.
- Where possible, the proponent should make it a requirement for contractors to implement a 'locals first' policy for construction jobs, specifically for semi and low-skilled job categories.
- The proponent and contractor should develop a Code of Conduct (CoC) for construction workers. The code should identify which types of behaviour and activities are not acceptable. Construction workers in breach of the code should be subject to appropriate disciplinary action and/or dismissed. All dismissals must comply with the South African labour legislation. The CoC should be signed by the proponent and the contractors before the contractors move onto site. The CoC should form part of the CHSSP.
- The proponent and the contractor should implement an HIV/AIDS and Tuberculosis (TB) awareness programme for all construction workers at the outset of the construction phase. The programmes should form part of the CHSSP.
- The contractor should provide transport for workers to and from the site daily. This will enable the contractor to effectively manage and monitor the movement of construction workers on and off the site.
- The contractor must ensure that all construction workers from outside the area are transported back to their place of residence within 2 days for their contract coming to an end.

### Construction Phase

- No construction workers, with the exception of security personnel, should be permitted to stay over-night on the site.

Residual impact	Impacts on family and community relations that may, in some cases, persist for a long period of time. Also, in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community.
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### Construction Phase

**Nature of the impact:** Potential impacts on family structures, social networks and community services associated with the influx of job seekers

**Description of Impact:**

Large construction projects tend to attract people to the area in the hope that they will secure a job, even if it is a temporary job. These job seekers can in turn become “economically stranded” in the area or decide to stay on irrespective of finding a job or not. While the proposed project on its own does not constitute a large construction project, the establishment of several renewable energy projects in the area may attract job seekers to the area. As in the case of construction workers employed on the project, the actual presence of job seekers in the area does not in itself constitute a social impact. However, the way in which they conduct themselves can impact on the local community. The main areas of concern associated with the influx of job seekers include:

- Impacts on existing social networks and community structures.
- Competition for housing, specifically low-cost housing.
- Competition for scarce jobs.
- Increase in incidences of crime.
- These issues are similar to the concerns associated with the presence of construction workers. However, given the location of the project and relatively short duration of the construction phase the potential for economically motivated in-migration and subsequent labour stranding is likely to be negligible. The risks associated with the influx of job seekers are therefore likely to be low.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Low	Probable
<b>Score</b>	2	2	n/a	2	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	Irreversible – in the case of HIV and AIDS	Low	Probable
<b>Score</b>	1	2	n/a	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (18)		Low Negative Impact (15)		
Was public comment received?	No				

**Construction Phase**

Has public comment been included in mitigation measures?	No
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Mitigation measures reduce residual risk or enhance opportunities:

It is impossible to stop people from coming to the area in search of employment. However, as indicated above, the proponent should ensure that the employment criteria favour residents from the area. In addition:

- Preparation and implementation of a SEP prior to and during the construction phase.
- Preparation and implementation of a CHSSP prior to and during the construction phase.
- Where reasonable and practical, the proponent should implement a "locals first" policy, specifically with regard to unskilled and low skilled opportunities.
- The proponent should implement a policy that no employment will be available at the gate.
- The contractor must ensure that all construction workers from outside the area are transported back to their place of residence within 2 days for their contract coming to an end.

Residual impact	Impacts on family and community relations that may, in some cases, persist for a long period of time. Also, in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community.
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**Construction Phase**

Nature of the impact: Potential risk to safety of farmers and farm workers, livestock and damage to farm infrastructure associated with the presence of construction workers on site.

Description of Impact:

The presence on and movement of construction workers on and off the site poses a potential safety threat to local farmers and farm workers in the vicinity of the site. In addition, farm infrastructure, such as fences and gates, may be damaged and stock losses may result from gates being left open and/or fences being damaged, or stock theft linked either directly or indirectly to the presence of farm workers on the site. Based on feedback from interviews with local landowners, stock theft was identified as a key concern.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Reversible – with compensation	Moderate	Probable
<b>Score</b>	3	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	Reversible – with compensation	Low	Probable
<b>Score</b>	2	2	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (33)		Low Negative Impact (24)		
Was public comment received?	No				

### Construction Phase

Has public comment been included in mitigation measures?

No

Mitigation measures reduce residual risk or enhance opportunities:

- Where reasonable and practical, the proponent should enter into an agreement with the affected local farmers in the area whereby damages to farm property etc. during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- The developer(s) and local farming community should co-ordinate (and if necessary, upgrade) security arrangements, such as establishment of security cameras at strategic locations.
- All farm gates must be closed after passing through.
- Contractors appointed by the proponent should provide daily transport for low and semi-skilled workers to and from the site.
- Where reasonable and practical, the proponent should consider the option of establishing a MC (see above) that includes local farmers and develop a Code of Conduct for construction workers. The MC should be established prior to commencement of the construction phase. The Code of Conduct should be signed by the proponent and the contractors before construction activities commence.
- The proponent should hold contractors liable for compensating farmers and communities in full for any stock losses and/or damage to farm infrastructure that can be linked to construction workers. This should be contained in the Code of Conduct to be signed between the proponent, the contractors, and neighbouring landowners. The agreement should also cover losses and costs associated with fires caused by construction workers or construction related activities (see below).
- The EMPr must outline procedures for managing and storing waste on site, specifically plastic waste that poses a threat to livestock if ingested.
- Contractors appointed by the proponent must ensure that all workers are informed at the outset of the construction phase of the conditions contained in the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.
- Contractors appointed by the proponent must ensure that construction workers who are found guilty of stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation.
- It is recommended that no construction workers, with the exception of security personnel, should be permitted to stay over-night on the site.

Residual impact | No, provided losses are compensated.

### Construction Phase

**Nature of the impact:** Potential noise, dust and safety impacts associated with construction related activities.

**Description of Impact:**

The construction related activities, including the movement of heavy construction vehicles of and on the site, has the potential to create dust, noise and safety impacts and damage roads. The impacts will be largely local and can be effectively mitigated. The number of potentially sensitive social receptors, such as farmsteads, will also be low due to the sparse settlement patterns and small number of farmsteads in the area.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Reversible	Moderate	Probable



Construction Phase					
<b>Score</b>	2	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short Term	n/a	Low	Probable
<b>Score</b>	1	2	n/a	2	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation / Enhancement</b>	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (30)			Low Negative Impact (15)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The movement of construction vehicles on the site should be confined to agreed access road/s.</li> <li>Establishment of a Grievance Mechanism that provides local farmers and other road users with an effective and efficient mechanism to address issues related to construction related impacts, including damage to local gravel farm roads.</li> <li>The movement of heavy vehicles associated with the construction phase should be timed to avoid times and days of the week, such as weekends, when the volume of traffic travelling along the access roads may be higher.</li> <li>Dust suppression measures should be implemented, such as wetting on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.</li> <li>All vehicles must be road worthy, and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits.</li> </ul>					
Residual impact	If damage to local farm roads is not repaired then this will affect the farming activities in the area and result in higher maintenance costs for vehicles of local farmers and other road users. The costs will be borne by road users who were no responsible for the damage.				

### Construction Phase

**Nature of the impact:** Potential loss of livestock, crops and houses, damage to farm infrastructure and threat to human life associated with increased incidence of grass fires

#### Description of Impact:

The presence of construction workers and construction-related activities on the site poses an increased risk of grass fires that could, in turn pose, a threat to livestock, crops, wildlife and farm infrastructure. The area is susceptible to grass fires during the summer months (October-May).

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Reversible - compensation paid for stock and crop losses etc.	Moderate	Probable
<b>Score</b>	4	2	n/a	6	3

Construction Phase					
<b>With Mitigation / Enhancement</b>	Local	Short Term	n/a	Low	Probable
<b>Score</b>	2	2	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation / Enhancement</b>	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)			Low Negative Impact (24)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- Where reasonable and practical, the proponent should enter into an agreement with the affected local farmers in the area whereby damages to farm property etc., during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- Contractor should ensure that open fires on the site for cooking or heating are not allowed except in designated areas.
- Smoking on site should be confined to designated areas.
- Contractor should ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high-risk dry, windy winter months.
- Contractor should provide adequate fire-fighting equipment on-site, including a fire fighting vehicle.
- Contractor should provide fire-fighting training to selected construction staff.
- No construction staff, with the exception of security staff, to be accommodated on site overnight.
- As per the conditions of the Code of Conduct, in the advent of a fire being caused by construction workers and or construction activities, the appointed contractors should compensate farmers for damage caused to their farms. The contractor should also compensate the fire-fighting costs borne by farmers and local authorities.

Residual impact	No, provided losses are compensated for.
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### Construction Phase

Nature of the impact: The activities associated with the construction phase, such as establishment of access roads and the construction camp, movement of heavy vehicles and preparation of foundations for the project etc. will damage farmlands and result in a loss of farmlands for grazing.

#### Description of Impact:

The activities associated with the construction phase and establishment of the proposed project and associated infrastructure will result in the disturbance and loss of land available for crops and grazing. However, experience from other WEFs is that impact on farming operations can be effectively minimised and mitigated by careful planning in the final layout of the proposed WEF and associated components. The impact on farmland associated with the construction phase can also be mitigated by minimising the footprint of the construction related activities and ensuring that disturbed areas are fully rehabilitated on completion of the construction phase. Recommended mitigation measures are outlined below.

### Construction Phase

The timing / phasing on construction activities should where possible also be planned to avoid and or minimise disruption to farming operations. Affected landowners should be involved in planning of timing of construction activities.

The timing / phasing on construction activities should where possible also be planned to avoid and or minimise disruption to farming operations. Affected landowners should be involved in planning of timing of construction activities.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term-permanent if disturbed areas are not effectively rehabilitated	Reversible	Moderate	Probable
<b>Score</b>	1	5	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short term if damaged areas are rehabilitated	Reversible	Low	Probable
<b>Score</b>	1	2	n/a	2	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- An ECO should be appointed to monitor the construction phase.
- Existing internal roads should be used where possible. In the event that new roads are required, these roads should be rehabilitated on completion of the construction phase.
- The footprint associated with the construction related activities (access roads, construction camps, workshop etc.) should be minimised.
- All areas disturbed by construction related activities, such as access roads on the site, construction camps etc., should be rehabilitated at the end of the construction phase.
- The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s appointed. The specifications for the rehabilitation programme should be included in the EMP.
- The implementation of the Rehabilitation Programme should be monitored by the ECO.

Residual impact	Overall loss of farmland could affect the livelihoods of the affected farmers, their families, and the workers on the farms and their families. However, disturbed areas can be rehabilitated.
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### 10.12.2 OPERATION PHASE

The following key social issues are of relevance to the operational phase:

### POTENTIAL POSITIVE IMPACTS

- The establishment of infrastructure to improve energy security and support renewable sector;
- Creation of employment opportunities;
- Benefits to the affected landowners; and
- Benefits associated with the socio-economic contributions to community development.

### POTENTIAL NEGATIVE IMPACTS

- Visual impacts and associated impacts on sense of place;
- Impact on property values; and
- Impact on tourism.

#### Operation Phase

**Nature of the impact:** Development of infrastructure to improve energy security and support the renewable sector.

#### Description of Impact:

The primary goal of the proposed project is to improve energy security in South Africa by generating additional energy. The proposed WEF also reduces the carbon footprint associated with energy generation. The project should therefore be viewed within the context of the South Africa's current reliance on coal powered energy to meet the majority of its energy needs, and secondly, within the context of the success of the REIPPPP.

#### Improved energy security

South Africa's energy crisis, which started in 2007 and is ongoing, has resulted in widespread rolling blackouts (referred to as load shedding) due to supply shortfalls. The load shedding has had a significant impact on all sectors of the economy and on investor confidence. The mining and manufacturing sector have been severely impacted and will continue to be impacted until such time as there is a reliable supply to energy. Load shedding in the first six months of 2015 was estimated to have cost South African businesses R13.72 billion in lost revenue with an additional R716 million was spent by businesses on backup generators.

Energy expert, Chris Yelland, has estimated the cost of Stage 1 load shedding resulting in 10 hours of blackouts per day for 20 days a month results in losses of R20 billion per month. Based on this Stage 2 load shedding costs the economy R40 billion per month and Stage 3 is estimated to cost the South African economy R80 billion per month.

A survey of 3 984 small business owners found that 44% said that they had been severely affected by load shedding with 85% stating that it had reduced their revenue, with 40% of small businesses losing 20% or more of revenue during due to load shedding period.

#### Impact of a coal powered economy

The Green Jobs study (2011) notes that South Africa has one of the most carbon-intensive economies in the world, thus making the greening of the electricity mix a national imperative. The study notes that renewable energy provides an ideal means for reaching emission reduction targets in a relatively easy manner. In addition, and of specific relevance to South Africa renewable energy is not as dependent on water compared to the massive water requirements of conventional power stations, has a limited footprint and therefore does not impact on large tracts of land, poses limited pollution and health risks, specifically when compared to coal and nuclear energy plants.

The Greenpeace Report (powering the future: Renewable Energy Roll-out in South Africa, 2013), also notes that within a broader context of climate change, coal energy does not only have environmental impacts, it also has socio-economic impacts. These include acid mine drainage from abandoned mines in South Africa and the risk this poses on the country's limited water resources.

## Operation Phase

### Benefits associated with REIPPPP

Through the competitive bidding process, the IPPPP has effectively leveraged rapid, global technology developments and price trends, buying clean energy at lower and lower rates with every bid cycle, resulting in SA getting the benefit of renewable energy at some of the lowest tariffs in the world. The price for wind power has dropped by 50% to R0.94/kWh, while solar PV has dropped with 75% to R1.14/kWh between BW1 and BW4.

Prices contracted under the REIPPPP for all technologies are well below the published REFIT prices. The REIPPPP has effectively translated policy and planning into delivery of clean energy at very competitive prices. As such it is contributing to the national aspirations of secure, affordable energy, lower carbon intensity and a transformed 'green' economy.

**Impact Status:** Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local, Regional and National	Long term	Reversible	High	Highly Probable
<b>Score</b>	4	4	n/a	8	4
<b>With Mitigation / Enhancement</b>	Local, Regional and National	Long term	n/a	High	Definite
<b>Score</b>	4	4	n/a	8	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	High Positive Impact (64)		High Positive Impact (85)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- Implement a skills development and training programme aimed at maximizing the number of employment opportunities for local community members.
- Maximise opportunities for local content, procurement, and community shareholding.

Residual impact	Overall reduction in CO <sub>2</sub> emission, reduction in water consumption for energy generation, contribution to establishing an economically viable commercial renewables generation sector in the Western Cape and South Africa.
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## Operation Phase

**Nature of the impact:** Creation of employment and business opportunities associated with the operational phase

### Operation Phase

#### Description of Impact:

The proposed development will create ~ 20 full-time employment opportunities during the operational phase. Based on similar projects the annual operating budget will be in the region of R 24 million (2023 Rand values), including wages.

#### Impact Status: Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local and Regional	Long term	n/a	Minor	Highly Probable
<b>Score</b>	1	4	n/a	2	4
<b>With Mitigation / Enhancement</b>	Local and Regional	Long term	n/a	Low	Highly Probable
<b>Score</b>	2	4	n/a	4	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Positive Impact (28)		Moderate Positive Impact (40)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

#### Employment

- Where reasonable and practical, the proponent should implement a 'locals first' policy, especially for semi and low-skilled job categories.
- Where feasible, efforts should be made to employ local contactors that are compliant with BBBEE criteria.
- Where feasible, training and skills development programmes for locals should be initiated as part of the operational phase. The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.
- Business
- The proponent should liaise with the LM with regards the establishment of a database of local companies, specifically BBBEE companies, which qualify as potential service providers for the operational phase.
- Note that while preference to local employees and companies is recommended, it is recognised that a competitive tender process may not guarantee the employment of local labour for the operational phase.

Residual impact	Creation of permanent employment and skills development opportunities for members from the local community and creation of additional business and economic opportunities in the area.
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### Operation Phase

**Nature of the impact:** The generation of additional income represents a significant benefit for the local affected farmer(s) and reduces the risks to their livelihoods posed by droughts and fluctuating market prices for sheep and farming inputs, such as feed etc.

### Operation Phase

#### Description of Impact:

The proponent will be required to either purchase the land or enter into a rental agreement with the affected landowners for the use of the land for the establishment of the proposed WEF. Farming operations are impacted by droughts and market fluctuations. Any additional source of income therefore represents a benefit for the affected landowner(s). The additional income would assist to reduce the risks to their livelihoods posed by droughts and fluctuating market prices for outputs and farming inputs, such as fuel, feed etc. The additional income would improve economic security of farming operations, which in turn would improve job security of farm workers and benefit the local economy.

**Impact Status:** Positive

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	Low	Probable
<b>Score</b>	1	4	n/a	4	3
<b>With Mitigation / Enhancement</b>	Local	Long term	Reversible	Moderate	Definite
<b>Score</b>	3	4	n/a	6	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Positive Impact (27)		High Positive Impact (65)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- Implement agreements with affected landowners.

Residual impact	Support for local agricultural sector and farming
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### Impact Phase: Operation Phase

**Nature of the impact:** Benefits associated with support for local community's form SED contributions.

#### Description of Impact:

The REIPPPP has been designed not only to procure energy but has also been structured to contribute to the broader national development objectives of job creation, social upliftment and broadening of economic ownership. Socio-economic development (SED) contributions are an important focus of the REIPPPP and are aimed at ensuring that local communities benefit directly from the investments attracted into the area. These contributions are linked to Community Trusts and accrue over the project operation life and, in so doing, create an opportunity to generate a steady revenue stream over an extended period. This revenue can be used to fund development initiatives in the area and support the local community. The long-term duration of the revenue stream also allows local municipalities and communities to undertake long term planning for the area. The revenue from the proposed WEF can be used to support a number of social and economic initiatives in the area, including:

### Impact Phase: Operation Phase

- Creation of jobs.
- Education.
- Support for and provision of basic services.
- School feeding schemes.
- Training and skills development.
- Support for SMME's.

The minimum compliance threshold for SED contributions is 1% of the revenue with 1.5% the targeted level over the 20-year project operational life. For the current portfolio of projects, the average commitment level is 2.2%, which is 125% higher than the minimum threshold level. To date (across seven bid windows) a total contribution of R23.1 billion has been committed to SED initiatives. Assuming an even, annual revenue spread, the average contribution per year would be R1.2 billion. Of the total commitment, R18.8 billion is specifically allocated for local communities where the IPPs operate. With every new IPP on the grid, revenues and the respective SED contributions will increase.

SED contributions do therefore create opportunities for local rural communities. However, SED contributions can also be mismanaged. This is an issue that will need to be addressed when managing SED investments.

Impact Status: Positive

	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	Local and regional	Long term	Reversible	Low	Probable
Score	2	4	n/a	4	3
With Mitigation / Enhancement	Local and regional	Long term	Reversible	Moderate	Definite
Score	3	4	n/a	6	5
Significance Calculation	Without Mitigation		With Mitigation / Enhancement		
$S=(E+D+R+M)*P$	Moderate Positive Impact (30)		High Positive Impact (65)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures reduce residual risk or enhance opportunities:

- The proponents should liaise with the LM to identify projects that can be supported by SED contributions.
- Clear criteria for identifying and funding community projects and initiatives in the area should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community.
- Strict financial management controls, including annual audits, should be instituted to manage the SED contributions.

Residual impact	Promotion of social and economic development and improvement in the overall well-being of the community.
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### Operational Phase

**Nature of the impact:** The potential impact on the sense of place of the region.

**Description of Impact:**

The operation of the Khoe Wind Energy Facility is expected to have a very high visual impact on observers/visitors residing at homesteads and tourist accommodation facilities within a 5km radius of the wind turbine structures. No mitigation of this impact is possible (i.e. the structures will be visible regardless), but general mitigation and management measures are recommended as best practice.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>With Mitigation / Enhancement</b>	Long distance	Long term	Reversible	Very High	Definite
<b>Score</b>	1	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (82)		Very High Negative Impact (82)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				

Mitigation measures reduce residual risk or enhance opportunities:

Planning:

- Retain/re-establish and maintain natural vegetation in all areas outside of the development footprint/servitude, but within the project site.

Operations:

- Maintain the general appearance of the facility as a whole.

Decommissioning:

- Remove infrastructure not required for the post-decommissioning use.
- Rehabilitate all areas. Consult an ecologist regarding rehabilitation specifications.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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### Operational Phase

**Nature of the impact:** Potential visual impact based on comments from local landowners

**Operational Phase**

**Description of Impact:**

Visual impact associated with the proposed facility and associated infrastructure and the potential impact on the area’s rural sense of place.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	High	Highly probable
<b>Score</b>	3	4	n/a	8	4
<b>With Mitigation / Enhancement</b>	Local	Long term	Reversible	High	Highly probable
<b>Score</b>	3	4	n/a	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	High Negative Impact (60)		High Negative Impact (60)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				

Mitigation measures reduce residual risk or enhance opportunities:

- The recommendations contained in the VIA should also be implemented.
- Install radar activated civil aviation light system.

Residual impact | Potential impact on current rural sense of place.

**Operational Phase**

**Nature of the impact:** Potential impact on value of visually affected properties

**Description of Impact:**

Potential impact of the WEF on property values

Based on the findings of the literature review the potential impact of WEFs on rural property values is likely to be low, specifically for farms that are farmed as productive farms. However, there are several nature reserves and tourist facilities in the area. The attraction of these areas is linked to the rural character of the area, including the views and vistas. The potential for the proposed WEF to visually impact on a number of these facilities and their associated property values therefore exists. As indicated above, the findings of the VIA (Logis, May 2024) indicate that the visual impact of the Khoe WEF on the areas sense of place will be Very High.

A Tourism Impact Assessment was undertaken by Urban Econ as part of the EIA (Urban Econ, 2024). The study also assessed the potential impact on property and land values in the affected area, including the impact on game farming operations. A detailed literature (international and local) was undertaken as part of the study. The study notes that the review of international literature corroborates the absence of direct linkages between wind farm developments and

## Operational Phase

property prices with various studies confirming that there is no long-term impact of wind farms on property values. Based on the local review, the Urban Econ study notes that in summary, the introduction of wind farm developments did not negatively impact property sales in the specified areas. While farm sales remained stable, there was a noticeable increase in the average sale price. The presence of wind farms did not deter buyers, instead, it may have motivated them, as evidenced by the upward trend in both sales and prices. Overall, there is no clear indication of a negative correlation between wind farm development timing and property sales in this section. Based on the findings of the study the impact of wind farms on local property values during the operational phase was rated as Low Positive (with and without enhancement). Property agents interviewed as part of the study noted that there was an increase in the price of agricultural property linked to the potential to rent out portions to the IPP companies. The same trends continued where wind farms are installed.

However, given the location of the proposed Khoe WEF and proximity of established nature-based tourism activities, the potential impact on property values of the directly affected properties is likely to be Medium Negative. Effective mitigation is not possible. This represents a negative externality for which the owners of these facilities may potentially suffer a financial loss. In the event the Khoe WEF is approved, the developer should liaise with the owners of the directly affected facilities to assess the potential impact of the Khoe WEF on property values and considered the option of compensation. Based on the findings of the SIA the potentially affected properties / establishments include Middelberg Guest Farm, Leeuwenboschfontein Guest Farm, Leeuwenboschfontein, Drie Kuilen Private Nature Reserve, Eximia Private Game Reserve, Langdam Guest Farm, and Porcupine Peak Guest Farm

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	2	4	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	1	4	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Moderate Negative Impact (27)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The recommendations contained in the VIA should also be implemented.</li> <li>The developer of the Khoe WEF should liaise with the owners of the affected operations to assess the potential impact of the WEF on property values and the option of compensation. An independent property valuator should be appointed at the cost of the developer to undertake the assessment.</li> <li>Install radar activated civil aviation light system.</li> </ul>					
Residual impact	Linked to visual impact on sense of place.				

**Impact Phase: Operational Phase**

**Nature of the impact:** Local tourism operations visually impacted by WEF

**Description of Impact:**  
Potential impact of the WEF on tourism operations that are visually impacted

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	2	4	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Long Term	Yes	Moderate	Probable
<b>Score</b>	1	4	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (36)		Low Negative Impact (27)		
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				

Mitigation measures reduce residual risk or enhance opportunities:

- The recommendations contained in the VIA should be implemented.
- The developer of the Khoe WEF should liaise with the owners of the affected operations to assess the potential impact of the Khoe WEF on future tourism operations and option of some form of compensation if a direct impact can be established.

Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.
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**Operational Phase**

**Nature of the impact:** Tourism in the region

**Description of Impact:**  
Potential impact of the WEF on local tourism in the area

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Yes	Minor	Improbable
<b>Score</b>	2	4	n/a	2	2

Operational Phase					
<b>With Mitigation / Enhancement</b>	Local	Long Term	Yes	Minor	Improbable
<b>Score</b>	2	4	n/a	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation / Enhancement</b>	
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (16)			Low Negative impact (16)	
Was public comment received?	Yes				
Has public comment been included in mitigation measures?	Yes				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The recommendations contained in the VIA should be implemented.</li> </ul>					
Residual impact	Linked to visual impact on sense of place.				

### 10.12.3 DECOMMISSIONING PHASE

Decommissioning Phase					
<b>Nature of the impact:</b> Social impacts associated with retrenchment including loss of jobs, and source of income. Decommissioning will also create temporary employment opportunities, which would represent a positive temporary impact.					
<b>Description of Impact:</b>					
Typically, the major social impacts associated with the decommissioning phase are linked to the loss of jobs and associated income. This has implications for the households who are directly affected, the communities within which they live, and the relevant local authorities. However, in the case of the proposed facility the decommissioning phase is likely to involve the disassembly and replacement of the existing components with more modern technology. This is likely to take place in the 20 - 25 years post commissioning. The decommissioning phase is therefore likely to create additional construction type jobs, as opposed to the jobs losses typically associated with decommissioning. The number of people employed during the operational phase will be in the region of 20. Given the low number of people employed during the operational phase the decommissioning of the facility will not have a significant negative social impact on the local community. The potential impacts associated with the decommissioning phase can also be effectively managed with the implementation of a retrenchment and downscaling programme.					
The decommissioning phase will also create employment opportunities. This will represent a positive impact. These jobs will, however, be temporary.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short term	n/a	Moderate	Probable
<b>Score</b>	4	2	n/a	6	3
<b>With Mitigation / Enhancement</b>	Local	Short term	n/a	Low	Probable

Decommissioning Phase					
Score	2	2	n/a	4	3
Significance Calculation	Without Mitigation			With Mitigation / Enhancement	
S=(E+D+R+M)*P	Medium Negative Impact (36)			Low Negative Impact (24)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>The proponent should ensure that retrenchment packages are provided for all staff retrenched when the plant is decommissioned.</li> <li>All structures and infrastructure associated with the proposed facility should be dismantled and transported off-site on decommissioning.</li> </ul>					
Residual impact	No, provided effective retrenchment package.				

## 10.13 TRAFFIC AND TRANSPORTATION

### 10.13.1 CONSTRUCTION PHASE

#### Impact Phase: Construction

**Nature of the impact:** Increase in general peak hour traffic volumes

**Description of Impact:** Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns.

Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Short Term	Recoverable	Low	Probable
<b>Score</b>	3	2	3	2	3
<b>With Mitigation</b>	Local	Short Term	Reversible	Very Low	Probable
<b>Score</b>	2	2	1	1	3

<b>Impact Phase: Construction</b>		
<b>Significance Calculation</b>	<b>Without Mitigation</b>	<b>With Mitigation / Enhancement</b>
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)	Low Negative Impact (18)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Limit use of private cars</li> <li>• Schedule development traffic movements to not coincide with existing peaks where possible</li> <li>• Encourage use of public/staff transportation</li> </ul>		
Residual impact	Negative, moderate and temporary	

<b>Impact Phase: Construction</b>					
<b>Nature of the impact:</b> Increase in abnormal traffic volumes					
<b>Description of Impact:</b> Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.					
The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	National	Short Term	Recoverable	High	Probable
Score	4	2	3	4	3
With Mitigation / Enhancement	National	Short Term	Recoverable	Moderate	Probable
Score	4	2	3	3	3
Significance Calculation	<b>Without Mitigation</b>		<b>With Mitigation / Enhancement</b>		

Impact Phase: Construction	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)      Moderate Negative Impact (36)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)</li> <li>• Transportation scheduling to consider the time of day when the abnormal loads would be moved</li> <li>• Other alternative modes of transportation (rail where feasible) should be considered</li> </ul>	
Residual impact	Negative, moderate and temporary

Impact Phase: Construction					
Nature of the impact: Impact of dust along gravel site access roads					
<b>Description of Impact:</b> Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	1	1	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)		Low Negative Impact (14)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				



**Impact Phase: Construction**

Mitigation measures to reduce residual risk or enhance opportunities:

- Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact

Residual impact	Yes, but acceptable.
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**Impact Phase: Construction**

**Nature of the impact:** Deterioration of surrounding road network

**Description of Impact:** Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.

Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	2	2	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)		Low Negative Impact (10)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Limiting the number and frequency of heavy and overloaded vehicles where possible</li> <li>Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions</li> </ul>					
Residual impact	Positive, roads will remain in better conditions post implementation of mitigation measures				

10.13.2 OPERATION PHASE

**Impact Phase: Operation**

**Nature of the impact:** Increase in general peak hour traffic volumes

**Description of Impact:** Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns. Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Reversible	Very Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>With Mitigation</b>	Site	Immediate	Reversible	Very Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (8)		Low Negative Impact (8)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Implementation of the Traffic Management Plan and Road Safety Measures
- Limit use of private cars
- Schedule development traffic movements to not coincide with existing peaks where possible
- Encourage use of public/staff transportation

Residual impact	Moderate and temporary
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**Impact Phase: Operation**

Nature of the impact: Increase in abnormal traffic volumes

### Impact Phase: Operation

Description of Impact: Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.

The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	3	1	3	3	3
<b>With Mitigation</b>	Regional	Immediate	Recoverable	Moderate	Low Probability
<b>Score</b>	3	1	3	3	2
Significance Calculation	Without Mitigation		With Mitigation		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)		Low Negative Impact (20)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to reduce residual risk or enhance opportunities:

- Implementation of the Traffic Management Plan and Road Safety Measures
- Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)
- Transportation scheduling to consider the time of day when the abnormal loads would be moved
- Other alternative modes of transportation (rail where feasible) should be considered

Residual impact	Negative, moderate and temporary
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### Impact Phase: Operation

Nature of the impact: Impact of dust along gravel site access roads

**Impact Phase: Operation**

Description of Impact: Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	Site	Immediate	Recoverable	Low	Low Probability
Score	1	1	3	2	2
With Mitigation	Site	Immediate	Reversible	Very Low	Improbable
Score	1	1	1	1	1
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (10)		Low Negative Impact (4)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact</li> </ul>					
Residual impact	Negligible				

**Impact Phase: Operation**

Nature of the impact: Deterioration of surrounding road network

Description of Impact: Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.

Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.

**Impact Phase: Operation**

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	1	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (8)		Low Negative Impact (8)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Limiting the number and frequency of heavy and overloaded vehicles where possible</li> <li>Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions</li> </ul>					
Residual impact	Positive, roads will remain in better conditions post implementation of mitigation measures				

**10.13.3 DECOMMISSIONING PHASE****Impact Phase: Decommission**

Nature of the impact: Increase in general peak hour traffic volumes

Description of Impact: Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns.

Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Impact Phase: Decommission****Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
Without Mitigation	Regional	Short Term	Recoverable	Low	Probable
Score	3	2	3	2	3
With Mitigation	Local	Short Term	Reversible	Very Low	Probable
Score	2	2	1	1	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)		Low Negative Impact (18)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Limit use of private cars</li> <li>• Schedule development traffic movements to not coincide with existing peaks where possible</li> <li>• Encourage use of public/staff transportation</li> </ul>					
Residual impact	Negative, moderate and temporary				

**Impact Phase: Decommission**

Nature of the impact: Increase in abnormal traffic volumes

Description of Impact: Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.

The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
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Impact Phase: Decommission					
<b>Without Mitigation</b>	National	Short Term	Recoverable	High	Probable
<b>Score</b>	4	2	3	4	3
<b>With Mitigation</b>	National	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	4	2	3	3	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
S=(E+D+R+M)*P	Moderate Negative Impact (39)		Moderate Negative Impact (36)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>• Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>• Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)</li> <li>• Transportation scheduling to consider the time of day when the abnormal loads would be moved</li> <li>• Other alternative modes of transportation (rail where feasible) should be considered</li> </ul>					
Residual impact	Negative, moderate and temporary				

Impact Phase: Decommission					
<b>Nature of the impact:</b> Impact of dust along gravel site access roads					
<b>Description of Impact:</b> Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.					
Impact Status: Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	1	1	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability

Impact Phase: Decommission					
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)			Low Negative Impact (14)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact</li> </ul>					
Residual impact	Yes, but acceptable.				

Impact Phase: Decommission					
Nature of the impact: Deterioration of surrounding road network					
Description of Impact: Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.					
Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.					
Impact Status: Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Short Term	Recoverable	Moderate	Probable
<b>Score</b>	2	2	3	3	3
<b>With Mitigation</b>	Site	Immediate	Reversible	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>			<b>With Mitigation</b>	



**Impact Phase: Decommission**

<b>S=(E+D+R+M)*P</b>	Low Negative Impact (30)	Low Negative Impact (10)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>• Limiting the number and frequency of heavy and overloaded vehicles where possible</li> <li>• Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions</li> </ul>		
Residual impact	Positive, roads will remain in better conditions post implementation of mitigation measures	

## 11. CUMULATIVE IMPACTS

### 11.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

Note that electrical grid infrastructure projects do not contribute to a loss of agricultural land and are not therefore included in this calculation of cumulative land loss. The area of land taken out of agricultural use as a result of all the projects within a 30 km radius (total generation capacity of 761 MW) will amount to a total of approximately 473 hectares. This is calculated using the industry standards of 2.5 and 0.3 hectares per megawatt for solar and wind energy generation respectively, as per the Department of Environmental Affairs (DEA) Phase 1 Wind and Solar Strategic Environmental Assessment (SEA) (2015). As a proportion of the total area within a 30 km radius (approximately 282,700 ha), this amounts to only 0.17% of the surface area. This is well within an acceptable limit in terms of loss of marginal potential agricultural land.

All the projects contributing to cumulative impact for this assessment have the same agricultural impacts in a very similar agricultural environment, and therefore the same mitigation measures apply to all.

Furthermore, it should be noted that there are few land uses, other than renewable energy, that are competing for agricultural land use in this area. The cumulative impact from developments, other than renewable energy, is therefore likely to be low.

The loss of agricultural potential by soil degradation can effectively be prevented for renewable energy developments by generic mitigation measures that are all inherent in the project engineering and/or are standard, best-practice for construction sites. Soil degradation does not therefore pose a cumulative impact risk.

Due to all the considerations discussed above, the cumulative impact of loss of future agricultural production potential is assessed as low.

### 11.2 FRESHWATER AND WETLANDS (AQUATICS)

The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.

#### Cumulative Impact: Cumulative impacts on the aquatic resources of the area

Nature of impact: The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long Term	Irreversible	Medium	Probable
<b>Score</b>	2	4	5	2	3
<b>With Mitigation</b>	Site	Short Term	Recoverable	Low	Low Probability
<b>Score</b>	1	2	3	1	2

<b>Cumulative Impact: Cumulative impacts on the aquatic resources of the area</b>		
<b>Significance Calculation</b>	Without Mitigation	With Mitigation
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)	Low Negative Impact (14)
Can Impacts be Enhanced?	No	
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>The project should share roads and infrastructure where possible to reduce the overall footprint and reduce stormwater and erosion and sedimentation related impacts.</li> <li>The projects should collaborate with provincial roads authority to upgrade the main access routes and improve the crossings and stormwater controls.</li> </ul>		
Residual impact	Low	

### 11.3 TERRESTRIAL BIODIVERSITY

<b>Impact Phase: Cumulative</b>					
<b>Description of the Cumulative Impact:</b> The consideration of five Solar Photovoltaic facilities within 30km of the proposed WEF brings about the potential of changes in broad-scale ecological processes brought on by vegetation clearing.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Long Term	Recoverable	High	Highly Probable
<b>Score</b>	3	4	3	4	4
<b>With Enhancement</b>	Regional	Long term	Recoverable	Moderate	Low Probability
<b>Score</b>	3	4	3	3	2
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (56)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities: <ul style="list-style-type: none"> <li>Developers within the area should share baseline data and operational monitoring data to Interested and Affected Parties on a quarterly basis.</li> <li>All mitigations for the proposed development should be strictly adhered to avoid cumulative contributions.</li> </ul>					
Residual impact	Proposed development unlikely to significantly contribute to broad-scale ecological impacts to flora in the area.				

## 11.4 FAUNA

Solar facilities typically involve more invasive vegetation clearing compared to WEFs. Consequently, this can lead to the loss of individual SCC and increased habitat fragmentation. Habitat fragmentation can reduce habitat connectivity and lead to changes in the dispersal of species, population isolation and reduced genetic diversity within landscapes. While the broad-scale impacts on habitat are concerning, it's noteworthy that the Fynbos biome is not listed as critically endangered. However, broad scale clearing of vegetation could lead to cascading effects in flow regimes, nutrient cycling, and energy flow which ultimately results in decreased biodiversity.

### Impact Phase: All

**Nature of the impact:** Contribution of the proposed development to the cumulative impacts of landcover and land-use to the long-term persistence and viability of animal SCCs in the area

**Impact Status:** Negative, Positive with mitigation

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long term	Recoverable	High	Highly Probable
<b>Score</b>	3	4	3	4	4
<b>With Mitigation</b>	Regional	Long term	Recoverable	High	Probable
<b>Score</b>	3	4	3	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative (56)		Moderate Positive (42)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Implement mitigation measures as detailed above</li> </ul>					
Residual impact	Improvement in habitat connectivity for relevant animal SCCs				

## 11.5 FLORA

Solar facilities typically involve more invasive vegetation clearing compared to WEFs. Consequently, this can lead to the loss of individual SCC and increased habitat fragmentation. Habitat fragmentation can reduce habitat connectivity and lead to changes in the dispersal of species, population isolation and reduced genetic diversity within landscapes. While the broad-scale impacts on habitat are concerning, it's noteworthy that the Fynbos biome is not listed as critically endangered. However, broad scale clearing of vegetation could lead to cascading effects in flow regimes, nutrient cycling, and energy flow which ultimately results in decreased biodiversity.

### Operational Phase

**Description of the Cumulative Impact:** The consideration of five Solar Photovoltaic facilities within 30km of the proposed WEF brings about the potential of changes in broad-scale ecological processes brought on by vegetation clearing.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Long Term	Recoverable	High	Highly Probable
<b>Score</b>	3	4	3	4	4
<b>With Enhancement</b>	Regional	Long term	Recoverable	Moderate	Low Probability
<b>Score</b>	3	4	3	3	2
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (56)		Low Negative Impact (26)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>Developers within the area should share baseline data and operational monitoring data to Interested and Affected Parties on a quarterly basis.</li> <li>All mitigations for the proposed development should be strictly adhered to avoid cumulative contributions.</li> </ul>					
Residual impact	Proposed development unlikely to significantly contribute to broad-scale ecological impacts to flora in the area.				

## 11.6 AVIFAUNA

The estimated figure for all avian fatalities is 1,292 birds (all species) from interactions with the one wind farm (Hugo WEF) and four solar farms within 30-km. About 173 of these are expected to be raptors as victims of wind energy facilities. This does not include species that may be displaced from these developments and excludes fatalities due to power line collisions.

These are medium-high totals and suggest cumulative totals must be ranked a medium-high and significant. With CRM- based mitigations (at the Hugo and Khoe WEFs) it is likely that these totals will be lower.

### Impact Phase: Cumulative Phase

**Nature of the impact:** Numerous WTG operating simultaneously from various WEFs in area

**Description of Impact:** Generally negative for birds due to direct fatalities due to collisions with spinning blades. Some species will also avoid the increased disturbance or move away as a result of habitat fragmentation or habitat destruction on site.

**Impact Status:** Negative

Impact Phase: Cumulative Phase					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Site	Short term	High	High	Highly likely
<b>Score</b>	1	4	3	5	5
<b>With Mitigation</b>	Regional	Short term	Low	Moderate	Probable
<b>Score</b>	2	4	4	4	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (85)		High Negative Impact (60)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to enhance opportunities:

- The Hugo wind farm north of Khoe has undertaken the same CRM process of avoidance of high-risk areas undertaken here for KHOE.
- All high-risk zones as delineated by any CRM should be adhered to (as outlined in this report) at both farms.
- Post-construction programmes must be conducted by an avifaunal specialist (following the Birds and Renewable Energy Specialist Group guidelines) to:
  - assess turbine-related fatalities; and
  - confirm that all aspects have been appropriately handled and that road and hard stand verges do not provide additional substrate for raptor prey species. It is essential that the new wind energy facilities do not create favourable conditions for such mammals in high-risk areas.
- A bird fatality threshold and adaptive management policy must be designed by an ornithologist for the site, prior to construction. This policy should form an annexure of the operational EMP for the facility. Most importantly, this policy should identify the number of bird fatalities of Priority species which will trigger an appropriate management response, and timelines for such responses. It is recommended that if 1 RD species or 2 or more LC species be killed per turbine per year then those turbines will require further mitigation.
- Should the identified Priority bird species fatality thresholds be exceeded in Year 1 and 2, either (i) patterned blades to make rotors more visible; or (ii) an observer-led turbine Shutdown on Demand (SDOD) programme (or automated SDOD) must be implemented on site. The human lead programme must consist of a suitably qualified, trained, and resourced team of observers present on site for all daylight hours 365 days of the year. This team must be stationed at vantage points (VPs) with full visible coverage of all turbine locations (typically 1 VP covering four turbines). The observers must detect incoming Priority bird species timeously, track their flights, and when adjudged to have entered a turbine proximity threshold, alert the control room to shut down the relevant turbine. A full detailed method statement or protocol must be designed by an ornithologist.

## 11.7 BATS

The potential cumulative impacts on bats identified at the proposed Khoe WEF:

- Destruction of natural habitat during construction; and
- A reduction in foraging space.

### Cumulative Phase

**Nature of the impact:** Activities associated with construction of solar farms within 30 km combined with the wind farm

**Description of impact:** The destruction of features that could serve as potential roosts, such as rock formations and derelict aardvark holes, and the removal of trees or the fragmentation of woody habitat which includes dense bushes in the surrounding 30 km, together with the construction activities of the wind farm. See Section 8 for a more in dept dis

Impact Status: Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Medium Term	Recoverable	Moderate	Definite
<b>Score</b>	2	3	3	3	5
<b>With Mitigation</b>	Local	Short Term	Recoverable	Low	Probable
<b>Score</b>	2	2	3	2	3
<b>Significance Calculation</b>	Without Mitigation			With Mitigation	
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (55)			Low Negative Impact (27)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to reduce residual risk or enhance opportunities:					
<ul style="list-style-type: none"> <li>No clearance of vegetation or construction activities should take place if there is a chance of disturbing a possible bat roost. If there is uncertainty about any feature that could comprise a bat roost, a bat specialist should be contacted.</li> <li>Apart from access roads and the management building, construction activities are to be kept out of all high bat-sensitive areas as far as possible.</li> <li>Rock formations occurring along the ridge lines should be avoided during construction, as these could serve as roosting space for bats.</li> <li>Destruction of limited trees should be avoided during construction.</li> <li>Care should be taken if any dense bushes are destroyed, to make sure that there are not bat roosts in the vegetation. If bat roosts are found, a bat specialist should be contacted immediately.</li> <li>Aardvark holes or any large derelict holes or excavations should not be destroyed before careful examination for bats.</li> <li>The ECO or a responsible appointed person or site manager should contact a bat specialist before construction commences so that they know what to look out for during construction.</li> </ul>					
Residual impact	Yes, natural habitat will be removed, but with rehabilitation a component of this could be replaced.				

## 11.8 HERITAGE AND ARCHAEOLOGY

As with palaeontology, cumulative impacts to archaeological sites and/or materials are difficult to assess, again because of the variable distribution of sites and materials across the landscape and because of the differences in the quality of surveys and reporting on different projects. Field observations made in previous assessments in the vicinity of the Khoe WEF indicate that archaeological sites and materials are not common in the area and that, provided

appropriate mitigation measures are implemented, a low (negative) cumulative impact significance can be expected.

### 11.9 PALEONTOLOGY

Impacts to the cultural landscape are considered to be the main driver of cumulative impacts on heritage resources and could be extensive if multiple projects are constructed in the vicinity, particularly if these projects are highly visible. These cumulative impacts cannot be fully mitigated but the implementation of the recommendations of visual consultants across all projects would likely reduce impacts from high to medium negative if highly sensitive areas are avoided.

### 11.10 VISUAL/LANDSCAPE

#### Cumulative Phase

**Nature of the impact:** The potential cumulative visual impact of wind farms on the visual quality of the landscape.

**Description of Impact:**

The study area is not located within a REDZ, and as such very limited renewable energy facilities can be found within a 30 km radius. No other wind energy facilities have been authorized within a 30 km radius; however, three (3) solar PV energy facilities have been approved, namely Sanral PV SEF to the north west and Touws River and Montague Road Solar PV SEFs to the north east.

The proposed Khoe WEF addressed in this report is one half of a larger wind energy cluster consisting of another proposed WEF to the north, namely Hugo wind energy facility.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>With Mitigation</b>	Medium distance	Long term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (85)		Very High Negative Impact (85)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation: N/A					
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain.				



### 11.11 NOISE

The potential effect of cumulative noises during the construction phase was considered, evaluating the impact from numerous simultaneous activities taking place at all locations where WTG will be developed. There are no other WEFs within the area of influence and there will not be a cumulative noise impact during the operational phase. The possible significance of the cumulative noise impact is summarized below.

#### Impact Phase: Cumulative Phase

**Nature of the impact:** Numerous WTG operating simultaneously from various WEFs in area

**Description of Impact:** Wind turbines from the Khoe and Hugo WEFs operating simultaneously, though the WTG of these WEFs is too far apart for potential cumulative noises (worst-case noise level of 47.7 (K-14) to 34.1 dBA (K-17)).

The projected noise levels, the potential change in ambient sound levels as well as the potential noise impact is defined per NSR.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>With Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (10)		Low Negative Impact (10)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
<ul style="list-style-type: none"> <li>The potential significance of a cumulative noise impact is low and additional mitigation are not required or recommended.</li> </ul>					
Residual impact	None				

#### Impact Phase: Cumulative Phase

**Nature of the impact:** Numerous WTG operating simultaneously from various WEFs in area

**Description of Impact:** Wind turbines from the Khoe and Hugo WEFs operating simultaneously, though the WTG of these WEFs is too far apart for potential cumulative noises.

The projected noise levels, the potential change in ambient sound levels as well as the potential noise impact is defined per NSR.

**Impact Status:** Negative

Impact Phase: Cumulative Phase					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>With Mitigation</b>	Regional	Long Term	High	Low	Possible
<b>Score</b>	3	4		4	2
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (22)		Low Negative Impact (22)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
<ul style="list-style-type: none"> <li>The potential significance of a cumulative noise impact is low and additional mitigation are not required or recommended.</li> </ul>					
Residual impact	None				

## 11.12 SOCIO-ECONOMIC

### Cumulative Phase

**Nature of the impact:** The potential cumulative visual impact of wind farms on the visual quality of the landscape.

**Description of Impact:** The proposed Khoe WEF is also one half of a larger wind energy cluster consisting of another proposed WEF to the south, namely the Hugo WEF. The cumulative visual impact of the proposed Khoe WEF, together with the proposed Hugo WEF is expected to be Very High, depending on the observer's sensitivity to wind turbine structures. The VIA notes that owing to the sensitivity of the landscape, the high visual quality and the potential visual impacts on sensitive visual receptors, the cumulative visual impact is not considered to be within acceptable limits.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Medium distance	Long-term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>With Mitigation</b>	Medium distance	Long-term	Reversible	Very High	Definite
<b>Score</b>	2	4	1	10	5
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		

Cumulative Phase	
<b>S=(E+D+R+M)*P</b>	Very High Negative Impact (85) Very High Negative Impact (85)
Was public comment received?	No
Has public comment been included in mitigation measures?	No
Mitigation measures to enhance opportunities:	
N/A	
Residual impact	The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed, and the area rehabilitated. Failing this, the visual impact will remain.

Cumulative Phase					
<b>Nature of the impact:</b> Cumulative Phase local services					
<b>Description of Impact:</b> The establishment of a number of renewable energy facilities and associated projects, such as the proposed WEF, in the BVM and LM has the potential to place pressure on local services, specifically medical, education and accommodation.					
<b>Impact Status:</b> Negative					
	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long-term	Reversible	Low	Probable
<b>Score</b>	1	4	n/a	4	3
<b>With Mitigation</b>	Local and regional	Long-term	Reversible	Low	Probable
<b>Score</b>	2	4	n/a	4	3
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (27)		Moderate Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Mitigation measures to enhance opportunities:					
The proponent should liaise with the LM to address potential impacts on accommodation and local services.					

### Cumulative Phase

Cumulative Phase

**Nature of the impact:** Cumulative Phase local Economy

**Description of Impact:** The establishment of a number of renewable energy facilities and associated projects, such as the proposed WEF, in the BVM and LM has the potential to place pressure on local services, specifically medical, education and accommodation.

**Impact Status:** Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Mitigation</b>	Local	Long term	Reversible	Low	Highly Probable
<b>Score</b>	1	4	N/A	4	4
<b>With Mitigation</b>	Local and regional	Long term	Reversible	High	Highly Probable
<b>Score</b>	3	4	N/A	8	4
<b>Significance Calculation</b>	<b>Without Mitigation</b>		<b>With Mitigation</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Positive Impact (36)		High Positive Impact (60)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				

Mitigation measures to enhance opportunities:

The proposed establishment of suitably sited renewable energy facilities and associated projects, such as the proposed WEF, within the LM should be supported.

## 11.13 TRAFFIC AND TRANSPORTATION

### Cumulative Impact: Increase in general peak hour traffic volumes

**Description of Cumulative Impact:** Increased traffic on the route and access points to site - Potential to be greater than what the existing road capacity of the local road network can handle in order to operate at an acceptable level of service.

This impact relates to potential disruption of traffic on local, regional and national roads. The severity of the impacts will depend on the order of the road (how many lanes, lanes width, length, turns, etc.), the receiving environment and vicinity of land uses and towns.

Additional traffic on the road network could result in changes to the operations of that road network, intersection capacity, such as increased congestion, delays, and accidents.

**Cumulative Impact: Increase in general peak hour traffic volumes****Impact Status:** Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Short Term	Recoverable	Probable	Probable
<b>Score</b>	3	2	3	3	3
<b>With Enhancement</b>	Local	Short Term	Recoverable	Probable	Probable
<b>Score</b>	2	2	3	3	3
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (33)		Low Negative Impact (30)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
<b>Enhancement:</b> <ul style="list-style-type: none"> <li>Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>Limit use of private cars</li> <li>Schedule development traffic movements to not coincide with existing peaks where possible</li> <li>Encourage use of public/staff transportation</li> </ul>					
Residual impact	Negative to Significant				

**Cumulative Impact: Increase in abnormal traffic volumes**

Description of Cumulative Impact: Additional heavy vehicles/E80's/Abnormal vehicles on the external road network- Potential to require additional road rehabilitation.

The impact of abnormal loads on public roads is expected to cause journey time delays and traffic congestion due to low travelling speeds of heavy vehicles transporting abnormal loads. These often occupy two standard traffic lanes and can potentially lead to incidents when travelling on single carriageways with a single lane per direction and without traffic police escorts.

**Impact Status:** Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Regional	Short Term	Recoverable	High	Highly Probable
<b>Score</b>	4	2	3	4	4

**Cumulative Impact: Increase in abnormal traffic volumes**

<b>With Enhancement</b>	Regional	Short Term	Recoverable	Probable	Probable
<b>Score</b>	3	2	3	3	3
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Moderate Negative Impact (39)		Moderate Negative Impact (33)		
Was public comment received?	No				
Has public comment been included in mitigation measures?	No				
Enhancement:	<ul style="list-style-type: none"> <li>Implementation of the Traffic Management Plan and Road Safety Measures</li> <li>Compliance to permissible heavy vehicle dimensions, permissible axle mass load on vehicles (no overloading)</li> <li>Transportation scheduling to consider the time of day when the abnormal loads would be moved</li> <li>Other alternative modes of transportation (rail where feasible) should be considered</li> </ul>				
Residual impact	Negative to Very Significant				

**Cumulative Impact: Impact of dust along gravel site access roads**

Description of Cumulative Impact: Heavy vehicles are expected to cause dust along unpaved access roads to the site. This can affect the air quality and visibility for nearby residents and road users. Larger vehicles generate more dust which can limit the ability of other vehicles to overtake due to poor visibility.

Impact Status: Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
<b>Without Enhancement</b>	Site	Immediate	Recoverable	Moderate	Probable
<b>Score</b>	1	1	3	3	3
<b>With Enhancement</b>	Site	Immediate	Recoverable	Low	Low Probability
<b>Score</b>	1	1	1	2	2
<b>Significance Calculation</b>	<b>Without Enhancement</b>		<b>With Enhancement</b>		
<b>S=(E+D+R+M)*P</b>	Low Negative Impact (24)		Low Negative Impact (10)		

**Cumulative Impact: Impact of dust along gravel site access roads**

Was public comment received?	No
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Has public comment been included in mitigation measures?	No
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**Enhancement:**

- Dust control measures such as regular wet grading and wetting for dust suppression to minimize the negative impact

Residual impact	Negligible
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**Cumulative Impact: Deterioration of surrounding road network**

**Description of Cumulative Impact:** Heavy vehicle traffic during construction of the development is expected to cause additional wear and tear on the surrounding road network. Gravel access roads to the sites are also expected to sustain damage during the construction phase of the project.

Abnormal loads can exert more pressure on road surfaces and infrastructure, leading to increased maintenance costs and reduced road network lifespan.

**Impact Status:** Detail of the impact is Positive, Neutral or Negative

	Extent	Duration	Reversibility	Magnitude	Probability
Without Enhancement	Regional	Short Term	Recoverable	Moderate	Probable
Score	1	1	3	4	3
With Enhancement	Local	Short Term	Recoverable	Low	Probable
<b>Score</b>	1	1	2	3	3

**Significance Calculation****Without Enhancement****With Enhancement****S=(E+D+R+M)\*P**

Low Negative Impact (27)

Low Negative Impact (21)

Was public comment received?	No
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Has public comment been included in mitigation measures?	No
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**Enhancement:**

- Limiting the number and frequency of heavy and overloaded vehicles where possible
- Undertaking regular maintenance, rehabilitation and upgrading substandard pavement conditions

## 12. SUMMARY OF FINDINGS, RECOMMENDATIONS AND CONCLUSION

### 12.1 SOIL, LAND USE AND AGRICULTURAL POTENTIAL

The site is in an area where there is limited crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore limiting to rain-fed cropping. The dominant soils are shallow soils on underlying weathered bedrock of the Glenrosa, Hutton, Swartland, and Mispah soil forms. There is a high proportion of rock outcrops. The soils are limited in their agricultural potential by shallow depths, rockiness, and low water holding capacity and are unsuitable for crop production as a result, except in some lower-lying areas where accumulation leads to deeper soils, and limited cropping is practised.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In the case of wind farms, the amount of land excluded from agriculture is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has. Furthermore, wind farms have both positive and negative effects on the production potential of land, and it is the net sum of these positive and negative effects that determines the extent of the change in future production potential.

From an agricultural impact point of view, it **is recommended that the proposed development be approved.**

### 12.2 FRESHWATER AND WETLANDS (AQUATICS)

It was determined that the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. The loss of irreplaceable aquatic habitat and/or important biota is highly unlikely, i.e. Very High sensitivity or No-Go areas. This also includes the spanning of a functioning drainage line, which would not be seen as problematic, if suitable stormwater management and drainage from the area of the site is provided. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

None of the proposed project alternatives (buildings) have a direct impact on the aquatic environment, making use of the existing provincial / district road network thus either option is deemed acceptable.

The significant impacts are associated with the access road crossings river systems. These systems are generally in a modified state, but still provide some habitat and important ecological functions.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

**The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.** None of the proposed project



alternatives (buildings) have a direct impact on the aquatic environment, making use of the existing provincial / district road network thus either option is deemed acceptable.

### 12.3 TERRESTRIAL BIODIVERSITY

The sensitivities presented in this assessment have been refined following the prescribed detailed site survey. The Sensitivities provided by the DFFE Online ST are a useful guideline, and the site's sensitivity has been verified against the EIA layout. The data collected to date suggests that the negative impacts to terrestrial biodiversity posed by the proposed development range from Moderate to Low with adherence to the recommended mitigation measures. Some mitigation measures involve avoiding highly sensitive areas, implementing ongoing biodiversity monitoring plans for various specialisms and to continuously adapt the EMPr throughout the development's operational lifecycle.

Mitigation recommendations are standard for wind energy developments, and provided these and considerations presented in the Terrestrial Biodiversity Specialist Assessment are met, the development of the Khoe WEF will be compatible with conservation efforts in the area. For spatial planning purposes it is recommended that wind turbines be preferentially placed within modified and / or disturbed areas of cultivated lands.

**It is the Specialist's opinion that the proposed Khoe WEF be considered for environmental authorization, provided all mitigation measures are adhered to.**

### 12.4 FAUNAL

Two non-avian SCCs were identified as relevant sensitivity features in the animal species theme output of the Screening Tool, namely the Least Concern Caledon Copper (*Aloeideas caledoni*, a butterfly) and Critically Endangered Riverine Rabbit (*Bunolagus monticularis*), both listed as 'Medium' sensitivity indicating the potential to occur on the study site. Two additional non-avian animal SCCs were determined relevant to the proposed development, namely the Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*).

A camera trap survey was conducted at 11 sampling locations (two on-site and nine off-site) in and around the proposed development area between 17 February 2022 and 23 December 2022, resulting in 1,832 camera trap days. A total of 2,778 independent records of 3,269 animals representing 66 species were recorded across the broader area. No Riverine Rabbit were recorded present on the Khoe WEF site, but were regularly recorded during simultaneous monitoring in the broader area. Grey Rhebok were confirmed on site and while Caledon Copper and Leopard were not confirmed on site, both were assumed to be present for the purposes of the assessment.

The animal sensitivity of the site was mapped through consideration of existing impacts, potential impacts of the proposed development and important ecological processes that should be acting across the site and broader area. Conservation objectives for all animal SCCs relevant to the project highlight the importance of dispersal corridors across the landscape to maintain genetic diversity and long-term studies on population dynamic. Agricultural activity across the site has modified the majority of preferred Riverine Rabbit habitat and obstructed potential animal movement corridors. The proposed development presents an opportunity to provide a land-use alternative to agricultural activity that is more compatible with conservation objectives for animal SCCs. Impacts can be minimized through in-situ biodiversity

rehabilitation, specifically through the restoration of strategic, currently modified areas to improve habitat connectivity for animal SCCs relative to the present condition.

The **proposed development is acceptable from an animal perspective** on condition that strategic areas of existing agricultural land be appropriately rehabilitated.

## 12.5 FLORA

The site is classified as High Sensitivity with areas characterized as Medium and Low Sensitivity by the DFFE Online Screening Tool (ST). Up to 1,782 plant species are potentially present on site, of which 48 are listed as SCC by the DFFE Online ST. Given the high number of species potentially present it is likely the number of SCC is greater than that provided by the DFFE Online ST. The proposed development area includes three vegetation types that are listed as LC by the RLE, and intersects in some areas with CBA and ESA.

The anticipated impacts include vegetation clearing, loss of individual SCC, alien invasive species, soil erosion, chemical contamination, and fire. Cumulative impacts include those that affect broad-scale ecological processes and conservation objectives. With adherence to the prescribed mitigation measures opportunities exist to promote conservation efforts, community engagement and education, and local environmental monitoring and research.

It is the Specialists opinion that SCC are likely present on site, therefore the DFFE Online ST Assessment of High Sensitivity in the Plant Species Theme for some areas is accurate. High sensitivity areas are predominantly those listed as CBAs. All other areas are either Medium Sensitivity or Low Sensitivity.

**It is the Specialists opinion that the proposed Khoe WEF may be considered for development, provided all mitigation measures are adhered to.**

## 12.6 AVIFAUNA

The Collision Risk Modelling allowed a fine-tuned assessment of not only the Passage Rates, but flight heights, the placement of turbines, and a more precise spatially explicit flight risk assessment to all seven Priority species. It gave eight levels of risk (from 1, the lowest, to 7.5, the highest) and we examined the data (lumped together, and for individual species like Verreaux's Eagle) to determine where the number of risky-flight minutes could be minimised in relation to areas.

The resulting identification of risk across spatially explicit areas indicated the north-eastern and central areas were high risk for Red Data species and the central and northern areas were high risk for Least Concern species. This resulted in 66.6% of the area designated for Khoe Wind Energy Facility as No-Go for turbines. Of the 29 proposed turbines, all avoid the riskiest areas predicted by the CRM. Note that some of them fall within the 3.7 km Verreaux's Eagle circular nest buffer, but no risk areas were identified for eagles within the sliver of the buffer inside the south-west boundary. For this reason, we favoured the CRM results as more precise than the coarse buffer approach.

Birds & Bats Unlimited concur with the DFFE Screening Tool Assessment that classified the Khoe area as of High Sensitivity.

According to available information collected during this study and based on the CRM-optimised layout for each of the 29 turbines proposed for the Khoe Wind Energy Facility, all high-risk areas for birds have been avoided.

According to available information consulted during this study to date, **there are no fatal flaws (assuming all mitigation measures will be implemented) from an avifaunal sensitivity perspective which should prevent the wind farm from proceeding.**

## 12.7 BATS

Data from passive monitoring systems, fieldwork sessions, roost surveys, and a desktop study informed this report. Six static SM4BAT systems were deployed within the project site, with four systems located near-ground at 10 m, to represent the various biotopes, and two on the met mast, within the sweep of the turbine blades, at 50 m and 100 m.

Of the 12 species with distribution ranges that include the proposed development area, three have a conservation status of Near Threatened in South Africa and one Vulnerable, while two have a global conservation status of Near Threatened. According to the likelihood of fatality risk, as indicated by the latest pre-construction bat guidelines six species, namely Natal long-fingered bat, Egyptian free-tailed bat, Roberts's flat-headed bat, Cape roof bat and the two fruit bats have a high risk of fatality, while Temminck's myotis bat has a medium-high risk and the endemic Long-tailed house bat has a medium risk of fatality.

Passive monitoring data for the period between 30 December 2022 and 7 March 2024 is included in this report. *L. capensis* was the most abundant species recorded (55%), while 37% of the calls were of those bats like the high-flying Egyptian free-tailed bat, which has a narrow wing morphology adapted for open air space. 4% of the activity recorded was similar to Natal long-fingered bat, 3% was Roberts's flat-headed bat, and a statistically insignificant number of the endemic Long-tailed house bat.

The average monthly activity shows that bats are generally most active during the summer months, followed by autumn and spring, with reduced activity during the winter months. Peak activity was recorded in March, November and December 2023, with general high activity from February to May 2023, and again from October 2023.

Due to the general high bat activity on site, the development areas were classified as medium sensitive. It will therefore be necessary to mitigate turbines early in the operational phase. No turbine components are allowed in high-sensitivity zones. At present no turbines are positioned in medium-high sensitivity zones either, but if turbines are placed on medium-high sensitivity zones, curtailment will have to be applied after the testing of those turbines, when they start to turn.

The overall potential negative impact of the proposed Khoe WEF on bats, combined for all the development phases, is predicted to be moderate negative without mitigation, while low negative with mitigation.

Based on the findings of the 14 months of pre-construction bat monitoring undertaken at the proposed Khoe WEF project site, the bat specialist is of the opinion that no fatal flaws exist which would prevent the construction and operation of this wind farm, but bat activity is high, and mitigation measures should be adhered to. **The EA may be granted, subject to the implementation of the recommended mitigation measures.**

## 12.8 HERITAGE AND ARCHAEOLOGY

This assessment has found that the area identified for the proposed Khoe WEF is a heritage environment of variable sensitivity but that significant impacts on palaeontological and archaeological resources arising from the project are unlikely and no fatal flaws have been identified. Impacts to the cultural landscape are expected to be significant, but these can be reduced through the implementation of suitable mitigatory measures. If the project were not implemented, the site would stay as it currently is with a neutral impact significance.

Despite the impacts to the cultural landscape, it is expected that mitigation measures will allow impacts to be managed.

**It is our considered opinion, therefore, that the proposed Khoe WEF may be authorised, but subject to the recommendations contained within this report.**

## 12.9 PALEONTOLOGY

According to SAHRA's palaeo-sensitivity map, the Khoe WEF footprint is in an area of generally very high or high palaeontological sensitivity. However, a palaeontological assessment for the adjacent proposed Ezelsjacht WEF found that because of the high levels of tectonic deformation of the fossiliferous bedrock, and the marked near-surface weathering of both mudrock and sandstone within that project area, the actual palaeontological sensitivity of that project area is much lower than indicated on the SAHRA map.

The PIA makes the following recommendation:

- Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. There is a moderate to small chance that fossils may occur in the mudstones, of the Ceres Subgroup that lie below the soils or in rocky outcrops.
- Therefore, a Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the environmental officer, or other responsible person once excavations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach. It should be noted that soil cover is likely to obscure any fossils.

**Considering the impacts that were assessed, there is no objection to the authorisation of this project,** assuming all mitigations/recommendations and buffer zones are implemented.

## 12.10 VISUAL/LANDSCAPE

Overall, the significance of the visual impacts associated with the proposed Khoe Wind Energy Facility is expected to be very high to high as a result of the generally undeveloped character of the landscape and its inability to absorb changes of this magnitude. Additionally, the facility would be visible within an area that contains certain sensitive visual receptors who already consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors include people travelling along the R318 and secondary roads, as well as, residents of rural homesteads and tourists passing through or holidaying in the region.

Night time impacts have also been assessed whereby it was determined that the significance of lighting (particularly aircraft warning lighting mounted on the turbines) on the nightscape

would be high post mitigation. As discussed, the greater environment is largely natural in character with limited built infrastructure. Unblemished night skies are a key attribute to the study areas sense of place and night time visual character. Light sources in the area are limited to isolated farm and homesteads and fleeting light from passing cars travelling along the R318 and other secondary roads. Therefore, the introduction of new light sources into a relatively dark night sky, will have an impact on the visual quality of the study area at night.

According to the Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning (DEA&DP) Guideline for Involving Visual and Aesthetic Specialists in the EIA Process (Oberholzer, 2005), the criteria that determine whether or not a visual impact constitutes a potential fatal flaw are categorised as follows:

1. Non-compliance with Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites.
2. Non-compliance with conditions of existing Records of Decision.
3. Impacts that may be evaluated to be of high significance and that are considered by the majority of the stakeholders and decision-makers to be unacceptable.

In terms of the above and to the knowledge of the author, the proposed development is compliant with all Acts, Ordinances, By-laws and adopted policies relating to visual pollution, scenic routes, special areas or proclaimed heritage sites, as well as, conditions of existing Records of Decisions. However, it must be noted that as per the *Guideline for the Management of Development on Mountains, Hills and Ridges of the Western Cape (April 2002)*, development on the crest of a mountain, hill or ridge will be strongly discouraged. Of the 38 turbines proposed, 28 are located on mountains and tall hills identified as having a high visual sensitivity and where development in these buffers is not considered best practice and should be avoided. Owing to the extremely close proximity of sensitive visual receptors to the proposed Khoe WEF, turbines placed on elevated terrain, such as mountains and tall hills, exacerbate the already very high visual impact on these receptors. As such, turbines placed on these areas will not be supported.

Furthermore, with regards to point 3 above, it has been established through the course of this assessment that many objections to the proposed Khoe WEF have been raised by stakeholders within the region, as communicated by the EAP and social impact specialist. Based on the objections received and the overall lack of support for wind energy facilities in the region, the author is of the opinion that the overall very high to high significance of the visual impacts anticipated for the proposed Khoe WEF are considered by the majority of the stakeholders and decision-makers to be unacceptable and that the statistical majority of objecting stakeholders has been exceeded. If evidence to the contrary surfaces during the progression of the development application, the specialist reserves the right to revise the statement below.

In light of the above assessment and the outcomes determined thereof, the author is of the opinion that the visual impacts associated with **the proposed Khoe Wind Energy Facility has exceeded acceptable limits and is considered fatally flawed from a visual perspective.** The author therefore does not support the authorisation of this project owing to the following:

- The overall very high to high visual impacts;
- The very high cumulative impact;
- Majority of the turbines are located on mountain and tall hills rated as having a high sensitivity;

- Majority of the stakeholders are against the project;
- The proposed Khoe WEF is located in significant proximity to sizeable established and planned tourism operations;
- Turbines are located within the buffer zones of protected areas and private nature reserves; and

The proposed Khoe WEF will result in significant loss of sense of place and uniqueness of landscape character.

### **EAP Motivation**

According to the visual assessment, landowners/receptors and travelers may view the turbines in a negative light, for others, wind turbines are not regarded as visually intrusive. The perception of what constitutes a negative visual impact is therefore personal and subjective. We have considered the responses from all Interested and Affected Parties (I&APs). In response, detailed simulations and visualisations were undertaken from various guesthouses to understand and address potential visual impacts. Adjustments to turbine placement was made based on the outcome of the visual impact assessment. Despite these efforts, some opposition persists.

The turbines located in high sensitivity areas are positioned there to take advantage of the optimal wind resource. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition.

I would also like to highlight the proposed Exemia game reserve (where the objections persist). Currently, the proposed campsite area remains undeveloped, and no concrete plans have been provided, so it is considered a future intent project.

Although the wind farm's visual impact on residents and tourism is high, the decision to proceed with its development is motivated by its considerable environmental and economic benefits. The project will contribute to the aforementioned frameworks, Western Cape Green Economy Strategy and Just Energy Transition and this transition is important to the country and to the future growth and sustainability as an organisation.

The establishment of the Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth. The nearest rural community is approximately 7.5 km from the proposed wind farm site. The development of the wind farm is expected to boost the local economy by creating job opportunities and supporting local businesses.

Additionally, traffic mitigation measures will be enforced to minimize disruptions for local residents and tourism activities, ensuring that the overall benefits of the wind farm outweigh the challenges.

### **12.11 NOISE**

This study considers the potential noise impact on the surrounding environment due to the proposed development, operation and decommissioning of the Khoe WEF (and associated infrastructure) north of Robertson in Western Cape Province. It is based on a predictive model to estimate potential noise levels due to the various activities and to assist in the identification of potential issues of concern.

It was determined that the potential noise impacts, without mitigation, would be:

- of a medium significance for the daytime construction of the access roads (access roads are far from verified NSR). While this significance may be due to the strict EIA criteria considered, mitigation measures are available that could reduce this significance to low;
- of a medium significance for the daytime construction traffic passing NSR (access roads are far from verified NSR). While this significance may be due to the strict EIA criteria considered, mitigation measures are available that could reduce this significance to low;
- of a low significance for the daytime construction activities (hard standing areas, excavation and concreting of foundations and the erecting of the WTG and other infrastructure) at the Khoe WEF;
- of a medium significance for the night-time construction activities (such as the pouring of concrete, erecting the WTG) at the Khoe WEF. Mitigation is available to reduce the significance of the noise impact to low;
- of a low significance for the daytime operational activities at the Khoe WEF;
- of a medium significance for operational activities (noises from wind turbines) at the Khoe WEF when considering the worst-case PWL. Mitigation measures are available and were recommended that would reduce this significance to low.

There is no potential for a cumulative noise impact.

The proposed layout (turbine placement) is considered acceptable from a noise perspective (subject total noise levels are less than 45 dBA at all NSR locations used for residential purposes). There is no restriction in the WTG that the applicant could use, though the applicant must monitor noise levels, the response of receptors to the noise levels and ensure that night-time noise levels are less than 45 dBA at all receptors (structures used for permanent residential purposes). Subject to this condition, **it is recommended that the proposed Khoe WEF (and associated infrastructure) be authorized.**

It should be noted that the applicant should re-evaluate the noise impact should:

- the layout be revised (as part of amendment process post EA) where any WTG, located within 2,500 m from a confirmed NSR, are moved closer to the NSR;
- the layout be revised (as part of amendment process post EA) where any new WTG are introduced within 2,500m from an NSR;
- the layout be revised (as part of amendment process post EA) where the number of WTG within 2,500m from an NSR are increased; and
- the applicant selects to use a WTG with a higher SPL than the WTG assessed in this report.

The applicant should also develop and implement an environmental noise monitoring programme at selected NSR living within the 42 dBA noise contour.

It is proposed that the applicant recommend to landowners that:

- no new residential dwellings be developed within areas enveloped by the 42 dBA noise level contour, and
- structures located within the 45 dBA noise level contour should not be used for permanent residential purposes.

## 12.12 SOCIO-ECONOMIC

The findings of the Social Impact Assessment (SIA) indicate that proposed Khoe WEF project will create several social and socio-economic benefits, including creation of employment and business opportunities during both the construction and operational phase. In addition, the WEF will generate renewable energy that will improve energy security in South Africa and contribute towards reducing the countries carbon footprint. However, the benefits associated with the WEF are not site dependent and would also be associated with an alternative site.

Based on the findings of the VIA, the Khoe WEF will have a very high negative impact on the areas sense of place. The cumulative impacts on the area's sense of place will also be very high negative. Effective mitigation is not possible. Based on this finding the visual impacts associated with the proposed Khoe WEF exceed acceptable limits and are considered as a fatal flaw from a visual perspective. The development of the Khoe WEF is therefore not supported by the VIA. The findings of the SIA support the findings of the VIA. Given the areas visual sensitivity and number of established nature reserves and associated eco-tourism facilities, the Khoe WEF is located in an area that is not regarded as suitable for the establishment of a large-scale wind energy facility.

Based on the findings of the SIA the development of the proposed Khoe WEF is not supported. The suitability of establishing large WEFs, including the proposed Khoe WEF, in the area to the south of the N1 is questioned. The development of renewable energy facilities in the area to the south of the N1 represents a spillover from the Komsberg REDZ located to the north of the N1. From a long-term planning perspective this not ideal, specifically given the environmental and scenic qualities of the area. In this regard the Western Cape Provincial Spatial Development Framework highlights the importance to the Province's landscape and scenic assets and threat posed by large scale infrastructural developments such as wind farms. The Langeberg Spatial Development Framework also identifies the R318 as scenic route highlights the importance of:

- Preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture.
- Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction.
- Promoting tourism to develop sensitively and contribute to the protection of the landscape and heritage landscape.

It is also important to note that the benefits associated with the WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.

### **EAP MOTIVATION**

As mentioned above, the Western Cape Provincial Development Framework Western Cape's cultural and scenic landscapes are significant assets that underpin the tourism economy, however according to the key Provincial climate change challenge, the plan is to devise and introduce effective adaptation and mitigation responses, especially for vulnerable municipalities. One of the focus areas for mitigation is renewable energy, which is directly applicable to this Project application. Support emergent Independent Power Producers (IPPs)



and sustainable energy producers (wind, solar, biomass and waste conversion initiatives) in suitable rural locations.

Furthermore, with load shedding costing South Africa's economy R500 million per stage, per day and the Western Cape's economy R75 million per stage (according to BusinessTech 2021), the country's energy crisis, needs large-scale private sector participation, in partnership with government. This will be key in addressing the current shortfall in the Western Cape.

To accelerate the decarbonisation of South Africa's economy and support economic growth, government from South Africa, France, Germany, the United Kingdom and the United States, along with the European Union announced a long-term Just Energy Transition Partnership in November 2022.

The Western Cape Climate Change Response Strategy (WCCCRS) was adopted in February 2014. The strategy is an update of the 2008 Western Cape Climate Change Response Strategy and Action Plan. The key difference with the 2008 Strategy is a greater emphasis on mitigation, including strategically suitable renewable energy development. The development of the WEF will contribute to national and global efforts to significantly reduce Green House Gas (GHG) emissions and build a sustainable low carbon economy, which simultaneously addresses the need for economic growth, job creation and improving socio-economic conditions.

Given the aforementioned framework and the Western Cape Green Economy Strategy, the establishment of this Wind Energy Facility will contribute to South Africa's decarbonization efforts while simultaneously generating employment opportunities, leading to improved economic growth.

The developer has taken into account the visual impact findings and has revised the layout multiple times to minimize visual impacts. However, the specific turbines which are located in high sensitivity areas are positioned there to take advantage of the optimal wind potential. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition, bearing in mind that this transition is important to the country and to the future growth of the renewables sector.

### 12.13 TRAFFIC AND TRANSPORTATION

The proposed development and final layout can be supported from a traffic engineering point of view. The base year and forecast year road capacity has indicated that the proposed development will have little to no significant impact on the existing road network capacity and intersection operational performance. Given the findings of this report, it is recommended that the proposed development be considered favourably from a traffic engineering point of view as the intended construction will have no significant negative impact on the surrounding road network. **The project can be considered for environmental authorisation.**

The following recommendations are made:

- A comprehensive route assessment of the entire transportation route to verify clearance, load bearing and sweeping radius distances is recommended.
- The main access to the development is proposed approximately 1.6 km east of the existing Main Road R319/DR01428 intersection. This is essentially the alternative location of the associated WEF facility infrastructure based on safety considerations and mitigation measures outlined in the report.

- It is recommended that the access points be priority controlled and widened to allow for acceleration lane and dedicated right turn lane off the main road, which will incorporate the turning characteristics of the expected abnormal vehicles.
- Clearance permits will be required for the transport of the WT components.
- It is recommended that applications for Abnormal Permits be lodged to the Department of Transport and Public Works, Eskom, and Telkom (where affected) at the time of construction.

## 13. IMPACT STATEMENT

### 13.1 CONDITIONS TO BE INCLUDED IN THE ENVIRONMENTAL AUTHORIZATION

#### 13.1.1 AQUATIC

- Any of the activities, should also be monitored by the appointed EO/ECO on a daily basis, especially during periods of river flow during construction.
- Any points of erosion should be stabilised immediately (sand bags in the short term) using gabions and reno mattress as required. No activities should take place outside of the demarcated servitude, to prevent additional cumulative impacts on these systems.
- The EMPr, must include a Construction Specific Monitoring and Rehabilitation Plan related to the water course and wetland crossings, and specifically to the prevention of erosion and sedimentation as these systems are prone to scour, with rehabilitation options being limited due to the sparse nature of the vegetation.
- Monitoring should occur on a monthly basis for 6 months post construction and where any unstable soils occur, these must be protected with temporary stabilisation dependent on the scale of the impact i.e. sand bags - hay bales) until areas become revegetated. If any areas require permanent erosion protection (e.g. gabions or stone pitching) then the WULA/GA must be amended to include these areas.

#### 13.1.2 BATS

- The final layout must be informed by the sensitivity map provided in Section 6. 10 of the main report.
- A bat specialist must be appointed before the commercial operation date. Mitigation measures, must form part of the operational EMPr, and be applied as directed.
- Turbines must be feathered below cut-in speed, and although they need not be at a complete standstill, there should be minimum movement so that bats are not at risk when turbines are not generating power.
- All newly built structures that have bat conducive features must be rehabilitated to discourage bat presence: Roofs of new buildings must be sealed and any open quarries and borrow pits created during construction must be rehabilitated.
- A minimum of two year's operational bat monitoring must be conducted after the commencement of operations at the proposed Khoe WEF, as per the guidance of the latest operational SABAA guidelines. Due to the high bat activity and future installation of mitigation measures, it might be necessary to conduct operational monitoring beyond the minimum of two years.

#### 13.1.3 HERITAGE AND ARCHAEOLOGY

- A pre-construction archaeological walkdown survey of the final WEF layout must be conducted by a suitably qualified archaeologist;
- In the event of archaeological resources being encountered during the course of development, work in the immediate area must be halted and the find reported to the ECO.

The ECO must inform HWC so that mitigatory action can be determined and be implemented if necessary. The find may require inspection or collection/excavation by an archaeologist. Such heritage is the property of the state;

- Should human remains be encountered, activities work in the vicinity of the find must cease, the remains must be left in situ but made secure and HWC must be notified immediately so that mitigatory action can be determined and be implemented;
- The screening of infrastructure area(s) from the R318,
- Keeping the construction and decommissioning duration as short as possible and as much of the activity as possible out of the public view;
- Ensuring that night-time light pollution is minimized, and
- Keeping construction and maintenance-related activities in designated and approved areas.

#### 13.1.4 PALEONTOLOGY

- A Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the ECO or other responsible person once excavations have commenced, they should be rescued and a palaeontologist called to assess and collect a representative sample, unless HWC recommends an alternative approach.

## 14. CONCLUSION

Based on the finding of the specialist studies, the information contained in this environmental impact assessment report and the evolution of the site development plan, it is the opinion of the EAP that the proposed development can be authorised, provided the above listed mitigation measures, as well as those contained in the Draft EMPr, are adhered to by the applicant.



## APPENDIX A      APPENDIX TITLE

### APPENDIX CONTENTS LIST

#### **Cutsheets**

To insert additional cutsheets add **Section Page Break** after this page. Add Appendix heading using Caption function: References > Insert Caption > Appendix. Change Appendix X to "APPENDIX HEADING" style. For Figures or Tables cutsheets, simply delete the "Appendix X" text.

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**To:** [REDACTED]  
**Subject:** FW: Hugo WEF Draft EIA: SABAA response  
**Date:** Tuesday, 27 August 2024 09:40:19  
**Attachments:** [0695823\\_HUGO WEF DEIAr\\_20240823.pdf](#)

---

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

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**From:** [REDACTED]

**Sent:** Sunday, August 25, 2024 2:23 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]



[REDACTED]  
**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-deiar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-deiar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

Website: [www.sabaa.org.za](http://www.sabaa.org.za)

[REDACTED]

[REDACTED]

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

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##### **Khoe WEF**

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**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

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<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
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<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

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#### **Ontwikkelingsligging:**

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Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

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**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

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<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
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<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
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**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk



## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE

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##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

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<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
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<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Tuesday, 27 August 2024 10:24:05

---

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day,

I am on leave and will be back at work on 28 August 2024.

Kind regards,  
Adri

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.

The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.  
If you are not the intended recipient you may not copy or deliver this message to anyone."

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

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##### **Hugo WEF**

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**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.



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<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd



## VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE

23 Augustus 2024

### KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

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Geregistreerde  
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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
Western Cape Province  
**Date:** Friday, 30 August 2024 10:41:41

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**WARNING:** The sender of this email could not be validated and may not match the person in the "From" field.

**EXTERNAL MESSAGE**

Good day,

It is currently an EWT Contact week and we are locked in workshops. For urgent matters, please get a hold of me on my mobile [REDACTED] I will respond to your email in due course.

Regards,

Kish

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended):** *If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.*

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyn (EAP).

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**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.



Tafel 1: Publiek Hersien en Lewer kommentaar Liggings

<b>Ligging</b>	Fisies Adres
<b>Elektronies Kopie Liggings (Beskikbaar vir aflaai hieronder)</b>	
<b>ERM Webwerf (beskikbaar vir aflaai)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	B&GPe kopie versoeke kan gestuur word via One Drive gedeelde gids.
<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

From: [REDACTED]  
To: [REDACTED]  
Subject: New Request to "Stakeholder Engagement"  
Date: Wednesday, 24 September 2014, 12:51  
Attachments: [REDACTED]

[You don't often get email from [info@adfm.com](mailto:info@adfm.com). Learn why this is important at <http://aka.ms/whythisisimportant>]

EXTERNAL MESSAGE

Dear Adfomers user,

Your form "Stakeholder Engagement" has a new response.

1. What's your name?  
E.K. Kain

2. Who do you represent?  
PVT capacity in neighbouring farm owner Neighbouring farm owner

3. What is your  
[REDACTED]

4. Your Phone Number  
[REDACTED]

5. Alternate Phone Number  
[REDACTED]

6. Your eMail  
[REDACTED]

7. What is your interest in the project?  
Neighbouring farm

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?  
Yes

9. What are your comments regarding the Haps and Khas WEF Facilities?  
Wind farm objection

1. Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms
2. Aesthetically unpleasant
3. Noise pollution (acoustic noise/vortex & mechanical noise)
4. Shadow flicker
5. Wildlife: Flying animals (currently there is a pair of endangered eagles in the mountains with fledglings, Blue crane birds, migrating ducks & geese, owls, bats, crows & hawks) Collisions with turbines, vaneless crown pulp flying animals out of their course, turbines interfering with bat roost navigation.
6. Interference to Forest & Parks
7. Affecting tourism, which the area highly relies on.
8. Lighting & fire ratings in turbines.
9. Wind turbine vibrations due to possible fluctuations in air pressure, vibrations & infrasound - further research still undergoing but can't with 100% certainty be discounted.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013  
Yes

You can turn off or manage notifications for this form at:  
<https://my.adfom.com/notifications>

Stay productive and take care!  
Your Adfomers Team

# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Wednesday, September 04, 2024 10:06 UTC

## What's your name?

*First Name*

H

*Last Name*

Kuhn

## Who do you represent?

*Organisation*

PVT capacity as neighbouring farm owner

*Designation*

Neighbouring farm owner

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*City*

Cape Town

*State/Province*

Western Cape

*Zip Code*

6720

*Country*

South Africa

## What is your interest in the projects?

Neighbouring farm

## Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

## What are your comments regarding the Hugo and Khoe WEF Facilities?

## Wind farm objections

1. Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms
  2. Aesthetically unpleasing
  3. Noise pollution (aerodynamic noise/vortex & mechanical noise)
  4. Shadow flickers
  5. Wildlife: flying animals (currently there is a pair of endangered eagles in the mountains with fledglings, Blue crane birds, migrating ducks & geese, owls, bats, crows & hawks) Collisions with turbines, vacuum created pulls flying animals out of their current, turbines interfering with bat sonar navigation.
  6. Disturbance to Fona & Flora
  7. Affecting tourism, which this area highly relies on.
  8. Lightning & Fire damage to turbines.
  9. Wind-turbine syndrome due to possible fluctuations in air pressure, vibrations & infrasound - further research still undergoing but can't with 100% certainty be disregarded.
- 

## **Protection of Personal Information (POPI) Act, Act 4 of 2013**

Yes

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## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
<b>Electronic Copy Locations (Available for download below)</b>	
<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
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<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd



## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

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Dankie vir u belangstelling in die projek.

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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

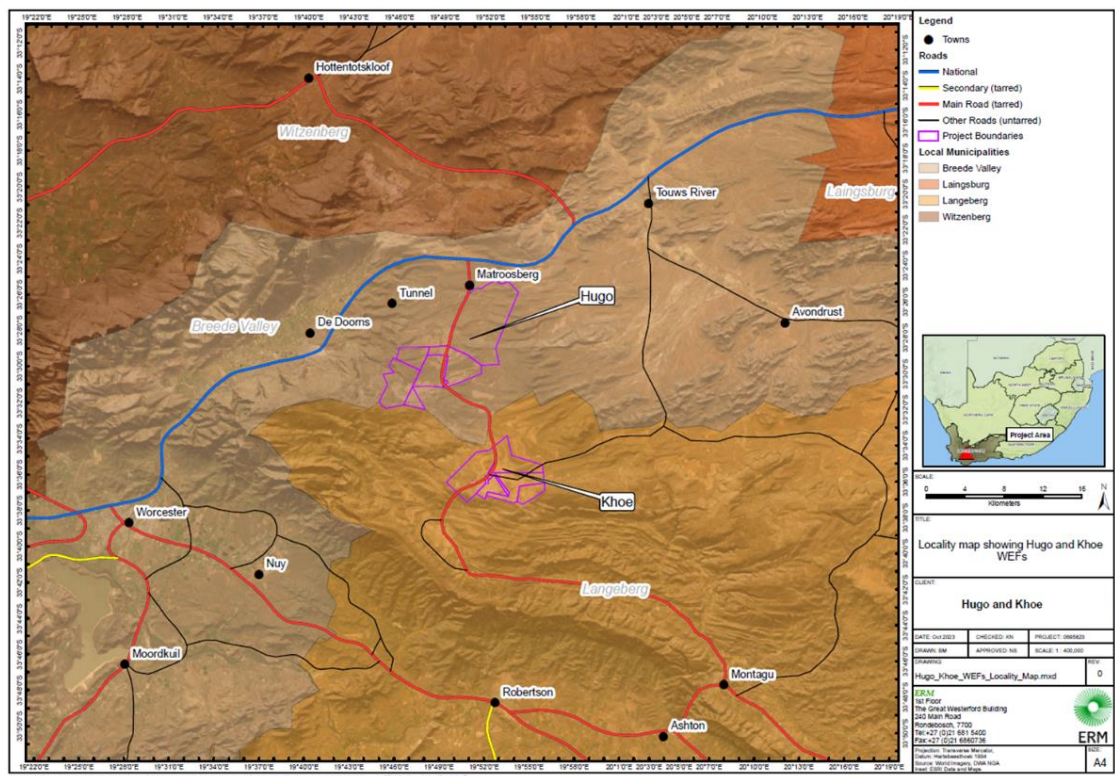
## ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE HUGO AND KHOE WIND ENERGY FACILITIES AND ANCILLARY INFRASTRUCTURE, NEAR DE DOORNS, WESTERN CAPE.

### BACKGROUND INFORMATION DOCUMENT [HUGO].



## 1. PROJECT BACKGROUND

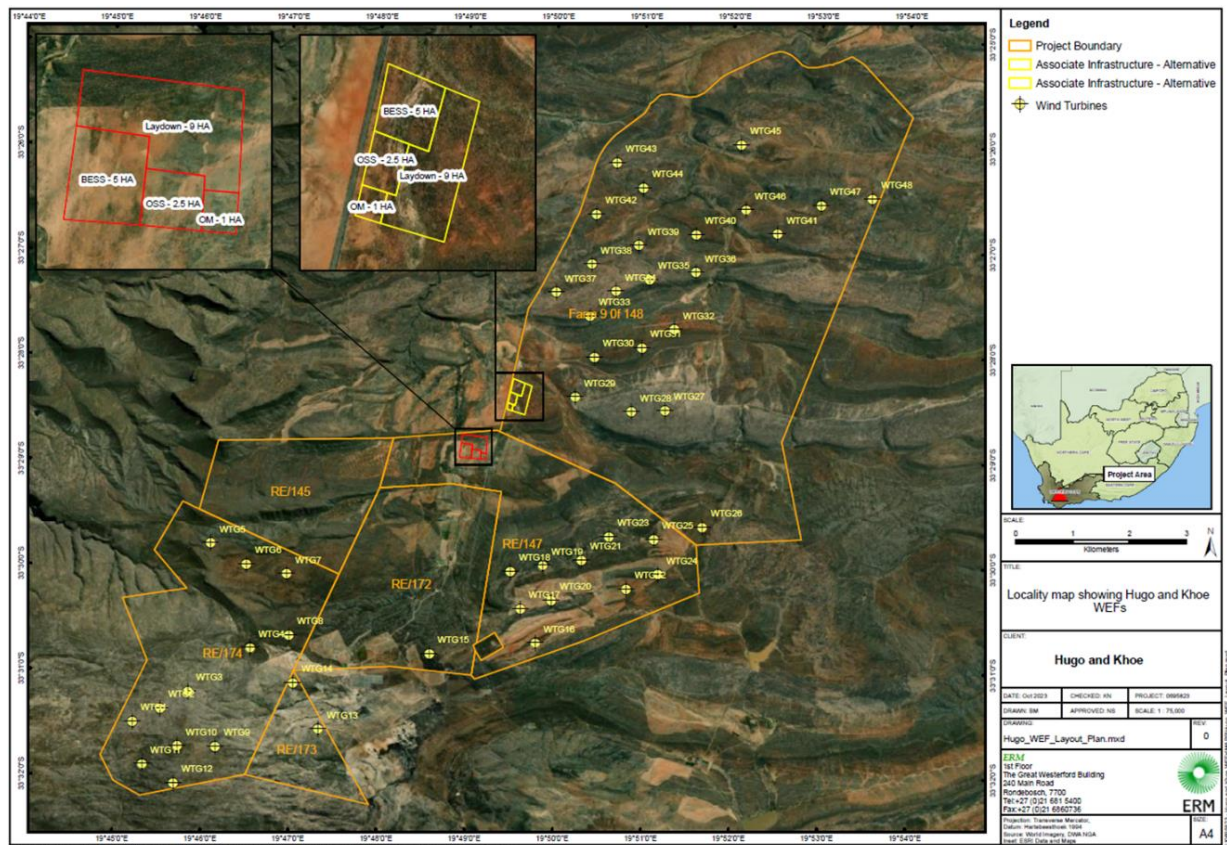
Environmental Resources Management Southern Africa Pty Ltd (ERM) was appointed by FE Hugo & Khoe Pty Ltd to conduct an Environmental Impact Assessment (EIA) for the proposed establishment of the Hugo wind energy facilities (WEF) and associated infrastructure in the Western Cape Province. The Hugo project site is located ~10 km east of De Doorns as shown by figure 1 below.



**Figure 1: Locality map of the Hugo and Khoe Project Sites.**

## 2. PROJECT DESCRIPTION

The proposed Hugo WEF will comprise up to 48 turbines with a maximum output capacity of up to 360 MW. This operation will also comprise access roads and internal roads, a Battery Energy Storage System (BESS), an Operations and Maintenance (O&M) building and a temporary site office. A 33kV underground/overhead cabling along the proposed roads and 132 kV Overhead line connecting to the IPP substation will also be installed to connect the WEF to the national electrical grid network. With this said, it must be noted that the grid connection will form part of a separate application process.



**Figure 2: A schematic layout of the proposed Hugo wind energy facility.**

## 3. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

Environmental studies will be undertaken to identify positive and negative potential environmental and social impacts for the construction and operation phases of the Project. Appropriate mitigation and compensation measures will then be proposed. The main impacts to be identified will focus on environmental aspects (e.g., landscape change, vegetation removal, habitat loss, noise increase, traffic control) and social aspects (e.g., socio-economic development, increased electricity generation, job creation, socioeconomic changes, and land use). At the scoping phase potential environmental and social impacts will be identified and based on this information, expert studies will be recommended for the ESIA phase.



## 4. ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) PROCESS

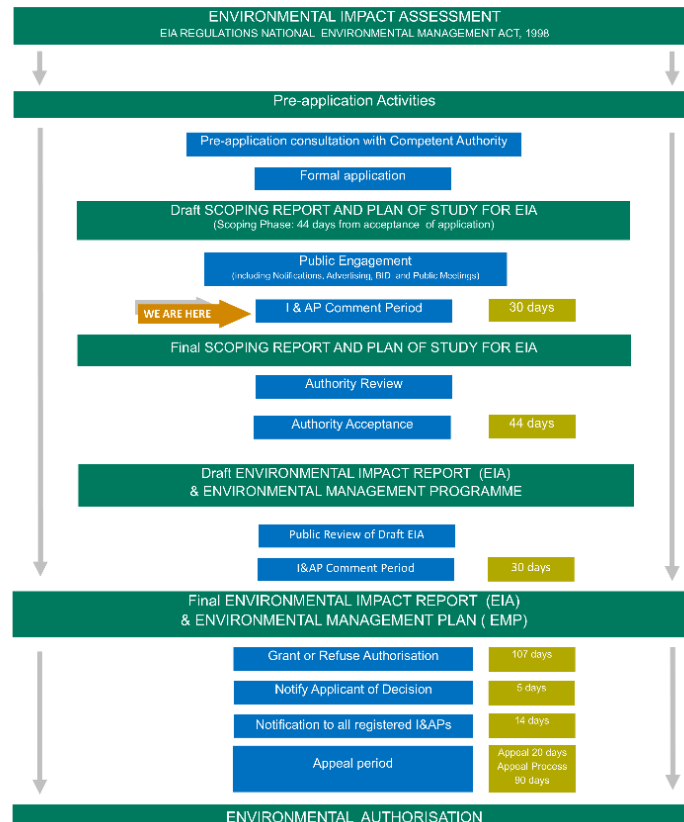
The Environmental Impact Assessment Regulations (EIA Regulations), promulgated under Government Notice R982 of 4 December 2014, as amended by Government Notice R326 of 7 April 2017, provide for the control of certain listed activities. These activities are prohibited to commence until environmental authorisation has been obtained from the competent authority. These activities are contained in:

- Listing Notice 1 (LN1): Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017.
- Listing Notice 2 (LN2): Scoping and EIA (S&EIA) of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017.
- Listing Notice 3 (LN3): Basic Assessment (BA) of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017.

Therefore, the project triggers listed activities of Listing Notice 2 and is therefore subject to a full Scoping and Environmental Impact Assessment (S&EIA) Process as follows:

### The Environmental Impact Assessment Process

The EIA process addresses potential issues raised by I&AP's in the scoping phase, identifying and assessing alternatives, to identify and assess significant impacts and developing mitigation measures. This will include the undertaking of an impact assessment, meeting with stakeholders and authorities, the conducting specialist and desktop studies, including fieldwork.





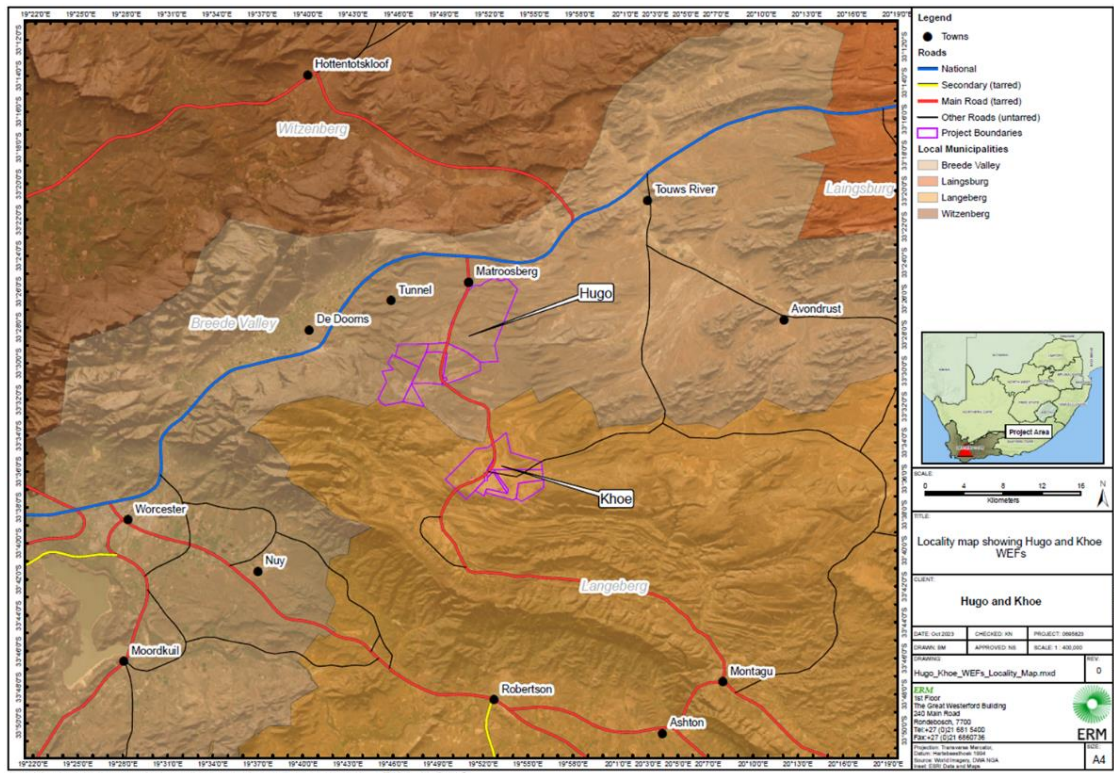
# OMGEWINGSIMPAKASSESSERINGSPROSES VIR DIE HUGO- EN KHOE-WINDENERGIE-FASILITEITE EN ONDERHOUDENDE INFRASTRUKTUUR, NABY DE DOORNS, WES-KAAP.

## AGTERGRONDINLIGTING-DOKUMENT [HUGO].



### 1. PROJEK-AGTERGROND

Environmental Resources Management Southern Africa Pty Ltd (ERM) is deur FE Hugo & Khoe Pty Ltd aangestel om 'n Omgewingsimpakassessering (OIA) te onderneem vir die voorgestelde oprigting van die Hugo-windenergie-fasiliteit (WEF) en gepaardgaande infrastruktuur in die Wes-Kaapprovinsie. Die Hugo-projekterrein is geleë ~10 km oos van De Doorns soos in figuur 1 onder getoon.

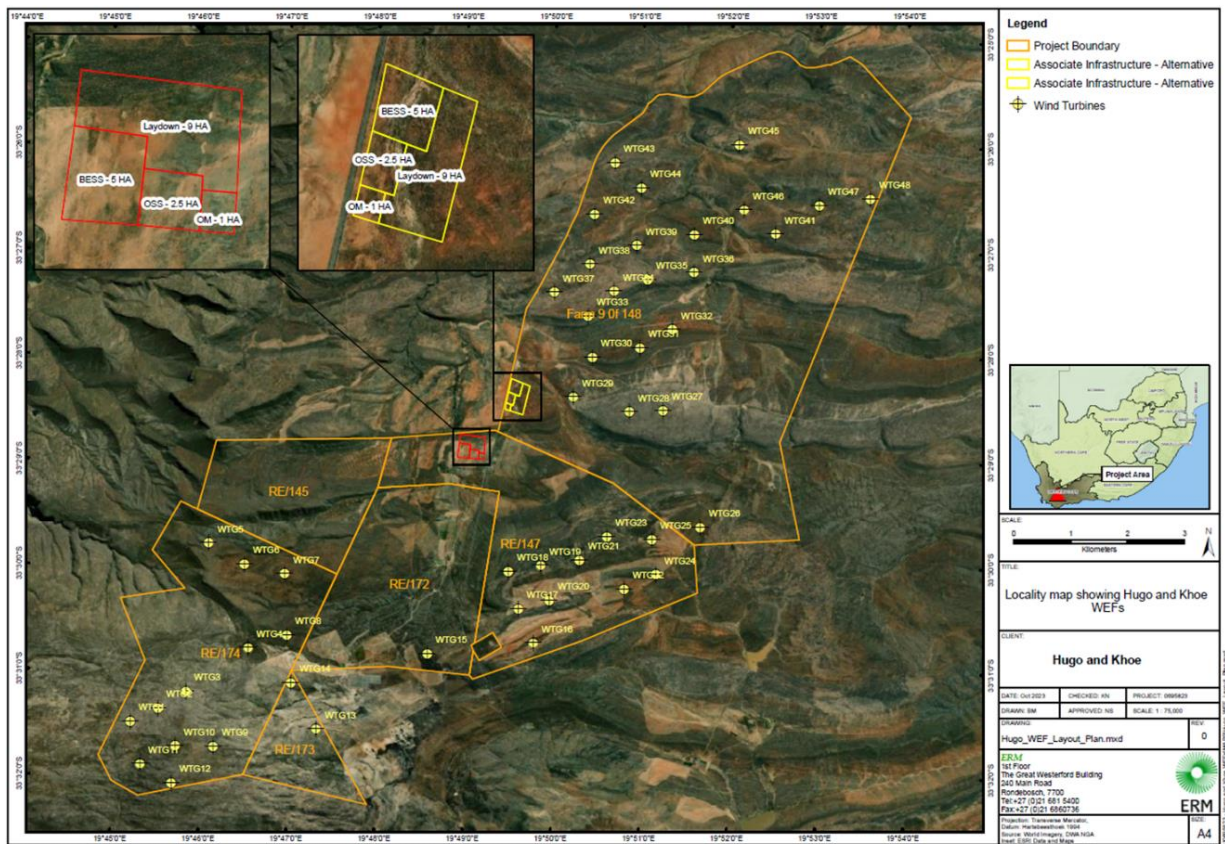


**Figuur 1: Liggingskaart van die Hugo- en Khoe-projekterreine.**



## 2. PROJEKBESKRYWING

Die voorgestelde Hugo-WEF sal bestaan uit tot 48 turbines met 'n maksimum leweringskapasiteit van tot 360 MW. Hierdie bedryf sal ook bestaan uit toegangspaaie en interne paaie, 'n battery-energie-bergingstelsel (BESS), 'n bedryfs- en instandhoudings- (O&M) gebou en 'n tydelike terreinkantoor. 'n Ondergrondse/oorhoofse kabel van 33 kV langs die voorgestelde paaie en 'n oorhoofse lyn van 132 kV vir verbinding met die IPP-substasie sal ook geïnstalleer word om die WEF te verbind met die nasionale elektrisiteitsnetwerk. Maar neem asseblief kennis dat die netwerkverbinding deel sal uitmaak van 'n afsonderlike aansoekproses.



**Figuur 2: Skematiese uitleg van die voorgestelde Hugo-windenergie-fasiliteit.**

## 3. POTENSIËLE OMGEWINGS- EN SOSIALE IMPAKTE

Omgewingstudies sal onderneem word om potensiële positiewe en negatiewe omgewings- en sosiale impakte te identifiseer vir die bou- en bedryfsfases van die projek. Gepaste mitigerings- en vergoedingsmaatreëls sal dan voorgestel word. Die vernaamste impakte wat geïdentifiseer word, sal fokus op omgewingsaspekte (bv. landskapverandering, verwydering van plantegroei, verlies aan habitat, toename in geraas, verkeerbeheer) en sosiale aspekte (bv. sosio-ekonomiese ontwikkeling, groter elektrisiteitsopwekking, werkskepping, sosio-ekonomiese veranderinge en grondgebruik). By die omvangassesseringsfase sal potensiële omgewings- en sosiale impakte geïdentifiseer word en, gegrond op hierdie inligting, sal deskundige studies voorgestel word vir die OSIA-fase.

#### 4. OMGEWINGS- EN SOSIALE IMPAKASSESSERINGS- (OSIA) PROSES

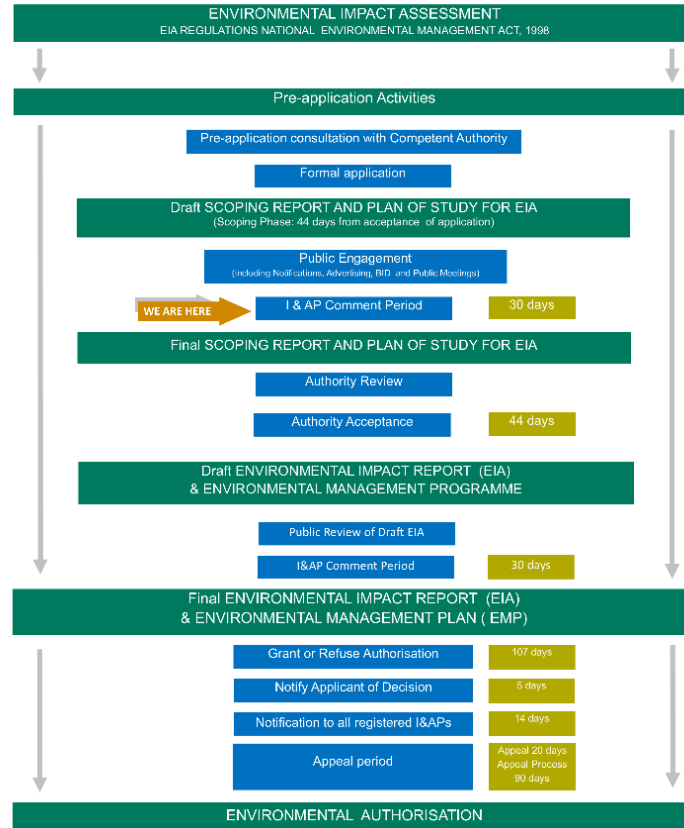
Die Omgewingsimpakassesseringsregulasies (OIA-regulasies), afgekondig kragtens Goewermentskennisgewing R982 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R326 van 7 April 2017, maak voorsiening vir die beheer van sekere gelyste aktiwiteite. Daar mag nie met hierdie aktiwiteite begin word voordat omgewingsmagtiging van die bevoegde owerheid verkry is nie. Hierdie aktiwiteite is vervat in:

- Lyskennisgewing 1 (LN1): Basiese assessering (BA) van die OIA-regulasies, afgekondig kragtens Goewermentskennisgewing R983 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R327 van 7 April 2017.
- Lyskennisgewing 2 (LN2): Omvang en OIA (O&OIA) van die OIA-regulasies, afgekondig kragtens Goewermentskennisgewing R984 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R325 van 7 April 2017.
- Lyskennisgewing 3 (LN3): Basiese Assessering (BA) van die OIA-regulasies, afgekondig kragtens Goewermentskennisgewing R985 van 4 Desember 2014, soos gewysig deur Goewermentskennisgewing R324 van 7 April 2017.

Die projek sit dus gelyste aktiwiteite van Lyskennisgewing 2 aan die gang en is daarom onderhewig aan 'n volledige omvang- en omgewingsimpakassesserings- (O&OIA) proses, soos volg:

## The Environmental Impact Assessment Process

The EIA process addresses potential issues raised by I&AP's in the scoping phase, identifying and assessing alternatives, to identify and assess significant impacts and developing mitigation measures. This will include the undertaking of an impact assessment, meeting with stakeholders and authorities, the conducting specialist and desktop studies, including fieldwork.



## Registrasie- en kommentaar-blad Desember 2023

**Indien u enige navrae, kommentaar of voorstelle oor die voorgestelde projek het, moet u dit asseblief hier onder aanteken.** Besorg hierdie kommentaar-blad terug aan Khosi Ngema van ERM Southern Africa:

Tel: +27105963690

E-pos: [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

Registreer my asseblief formeel as 'n belanghebbende en geraakte party (B&GP) en voorsien verdere inligting en kennisgewings gedurende die EIA-proses.	<b>Ja</b>	<b>Nee</b>
Ek wil graag my kennisgewings ontvang per:	<b>Hand</b>	<b>E-pos</b>
	<b>Pos</b>	<b>Faks</b>



## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
<b>Electronic Copy Locations (Available for download below)</b>	
<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended):** *If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.*

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
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<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Hugo WEF Draft EIA: SABAA response  
**Date:** Wednesday, 11 September 2024 08:50:46

---

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Sunday, August 25, 2024 2:23 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

<Stephanie.Gopaul@erm.com>

**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-dejar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-dejar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 “The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance” does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

Website: [www.sabaa.org.za](http://www.sabaa.org.za)



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province  
**Date:** Thursday, 12 September 2024 14:50:47  
**Attachments:** [image007.png](#)  
[image015.png](#)  
[image016.png](#)  
[image017.png](#)

---

Thank you for your response. This has been noted.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 6, 2024 8:43 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Your e-mail dated 01.07.2024 refers.

Kindly note that Transnet will not be directly affected by the proposal. Please refer to the attached Google Imagery.

The distance from **Matroosberg High Site** to the **nearest Wind Turbine (WTG5)** is **± 2km**.  
The distance from **Matroosberg Station railway line** to the **nearest Wind Turbine (WT43 and WTG45)** is **800m**

Kind Regards.



*Anel Abrahams*

Infrastructure Maintenance  
Transnet Freight Rail, Bellville



---

[www.transnet.net](http://www.transnet.net)

TRANSNET CONFIDENTIAL INFORMATION

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**From:** [REDACTED]  
**Sent:** Monday, July 8, 2024 1:28 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

For your further attention, please.

---

TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]

**Sent:** Friday, July 5, 2024 12:23 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Good day Annelize

This notification relates to the attached correspondence.

Please note that our response remains the same.

Kind Regards



**Mavhungu Lucky Netshikovhela**  
Technician (Property)  
Geo-Spatial - Western Cape Region  
Transnet Property  
Room 505, 1 Adderley Street, Cape Town, 8001  
[REDACTED]

---

TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]

**Sent:** Tuesday, July 2, 2024 8:41 AM

**To:** [REDACTED]

**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Hi Lucky

Please check if Transnet will be affected by this application.

Thanks,

Kind regards

**Burton Siljeur**  
Chief Technician (Property)  
Geo-Spatial: Western Region  
Transnet Property  
No. 1 Adderley Street, Cape Town



TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]  
**Sent:** Tuesday, July 2, 2024 8:21 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

Good Morning

The attached Notification is for your further attention and comments, please.

Regards

**Annelize Harmse**  
**Chief Admin Official**  
[REDACTED]  
138 Eloff Street  
4<sup>th</sup> Floor, Central Wing  
BRAAMFONTEIN  
JOHANNESBURG  
2001



TRANSNET CONFIDENTIAL INFORMATION

**From:** [REDACTED]  
**Sent:** Monday, July 1, 2024 2:02 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission of Final Scoping Report for the Proposed Hugo and Khoe WEF, Western Cape Province

**⚠ CAUTION: EXTERNAL SENDER - Please be careful when opening links and attachments. ⚠**

Please report any suspicious mail to [phishing@transnet.net](mailto:phishing@transnet.net). Transnet Information Security

Dear Registered Interested and Affected Party



**NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Hugo and Khoe WEF, in the Western Cape Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from Thursday, 29 February 2024 until Tuesday, 02 April 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

**Email:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

**Website:** <https://www.erm.com/hugoandkhoe/>

Thank you for the interest in the project.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 13 September 2024 14:12:09  
**Attachments:** [IAP Verwysings brief Afrikaans.pdf](#)  
[image001.png](#)  
[IAP Notification Letter English.pdf](#)

---

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, August 30, 2024 10:40 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

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<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

## **VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE**

23 Augustus 2024

### **KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR**

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

#### **Ontwikkelingsligging:**

##### **Hugo WEF**

Die voorgestelde Hugo WEF is gelleë naby De Doorns in die Breedevallei Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

##### **Khoe WEF**

Die voorgestelde Khoe WEF Cluster is gelleë naby De Doorns in die Langeberg Plaaslike Munisipaliteit in die Wes-Kaap Provinsie.

**Toepassing Proses:** In bepalings van hoofstuk 5 van die Nasionale Omgewing Bestuurswet, 1998 (Wet 107 van 1998 – NEMA), en die Omgewing Impakbepaling (OIE) Regulasies, 2014 (soos gewysig), die Projek aansoekers het Omgewings hulpbron bestuur Suider Africa (Edms) Bpk (ERM) aangestel, om as die projekbestuurder op te tree en om die Omvang en Omgewing Impak bepaling (OIS) te onderneem as die onafhanklik omgewings impak beoordeling praktisyen (EAP).

**ERM het twee aparte Konsep OIB-verslae ingedien aan die Departement van Bosbou, Visserye en die Omgewing (DFFE).**

**Uitnodiging aan Opmerking:** Lede van die publiek, plaaslike gemeenskappe, en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIB-verslae, wat beskikbaar is vir publieke hersiening en kommentaar, van **Vrydag, 23 Augustus 2024 tot die Maandag, 21 September 2024 (albei dae ingesluit)**, as per Tabel 1 hieronder.

Tafel 1: Publiek Hersien en Lewer kommentaar Liggings

<b>Ligging</b>	Fisies Adres
<b>Elektronies Kopie Liggings (Beskikbaar vir aflaai hieronder)</b>	
<b>ERM Webwerf (beskikbaar vir aflaai)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	B&GPe kopie versoeke kan gestuur word via One Drive gedeelde gids.
<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

**Nota, aangaande die Beskerming van Persoonlik Inligting Wet (PoPI Wet 4 van 2013, as gewysig):** As u versoek aan registreer as 'n B&GP, sal u persoonlik inligting beskikbaar gemaak word aan 'n appellant in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes om ingelig te word en toegang tot 'n oudit verslag te kry.

Korrespondensie deurgaans die Toepassing Proses sal slegs versprei word aan geregistreerde B&GPe. Registrasie is moontlik deur die tyd van die aansoekproses.

Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.



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

Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

## VOORGESTELDE HUGO EN KHOE WIND ENERGIE FASILITEIT, WES-KAAP PROVINSIE

23 Augustus 2024

### KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP OMGEWING IMPAK STUDIE (OIS) VERSLAE VIR PUBLIEKE OORSIG EN KOMMENTAAR

**23 Augustus 2024**

DFFE Verwysing: 14/12/16/3/3/2/2515 en 14/12/16/3/3/2/2516

**Natuur van Aktiwiteit :** Hugo Wind energie fasiliteit (Edms) en Khoe Wind energie fasiliteit (Edms) Bpk. stel die vestiging van 'n wind energie fasiliteit (WEF) voor, insluitend ge-assosieerde netwerk verbinding en infrastruktuur ('die WEF en ge-assosieerde infrastruktuur'). Die potensiele opwekkingsvermoë van Hugo Wind Energy Facility (Edms) is tot 336 MW en Khoe Wind Energy Facility (Edms) is tot 232 MW . Elke Wind energie fasiliteit sal verskeie geboue, toegangspaaie, 'n battery-energie-bergingstelsel (BESS) en 'n substasie-spilpunt met gepaardgaande elektriese netwerk infrastruktuur soos maar nie beperk tot 'n 132kV / 33 kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

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<b>Via One Drive</b>	B&GPe kopie versoeke kan gestuur word via One Drive gedeelde gids.
<b>Harde Kopie Ligging</b>	
<b>De Doorns Openbare Biblioteek</b>	Stasieweg 7, De Doorns , Wes-Kaap, Suid-Afrika
<b>CD Afskrifte sal beskikbaar gemaak word op versoek aan die EAP.</b>	

<b>Sal u wens om te registreer as 'n B&amp;GP en / of kommentaar in te dien, verskaf asseblief u naam, belangstelling in die projek of kommentaar, e-pos en pos adres en telefoon nommer of in skrif aan onderstaande adres:</b>	
<b>Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk</b>	ERM Suider Afrika (Edms) Bpk. 1 <sup>ste</sup> Vloer Great Westerford 240 Main Road, Rondebosch Kaapstad, 7700 South Africa
<b>Projek Verwysing:</b> 0695823 Hugo&Khoe WEF	<b>Kontak Persoon:</b> Sadiya Salie
<b>E-pos:</b> hugokhoe@erm.com	<b>Telefoon:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Aanlyn:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Dankie vir u belangstelling in die projek.

Vir enige vedere inligting, kontak asseblief ondergetekende persoon.

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Stephanie Gopaul  
Geregistreerde  
EAP  
Omgewing Hulpbronne Bestuur Suidelike Afrika (Edms) Bpk

## **PROPOSED HUGO AND KHOE WIND ENERGY FACILITY, WESTERN CAPE PROVINCE**

23 August 2024

### **NOTIFICATION OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORTS FOR PUBLIC REVIEW AND COMMENT**

**23 August 2024**

DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516

**Nature of Activity:** Hugo Wind Energy Facility (Pty) and Khoe Wind Energy Facility (Pty) Ltd propose the establishment of a Wind energy facility (WEF), including associated grid connection and infrastructure ('the WEF and associated infrastructure'). The potential generation capacity of Hugo Wind Energy Facility (Pty) is up to 336 MW and Khoe Wind Energy Facility (Pty) is up to 232 MW. Each Wind Energy facility will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 33 kV overhead transmission powerline connecting the WEF to the national electrical grid network.

#### **Development Location:**

##### **Hugo WEF**

The proposed Hugo WEF is located near De Doorns within the Breede Valley Local Municipality in the Western Cape Province.

##### **Khoe WEF**

The proposed Khoe WEF Cluster is located near De Doorns within the Langeberg Local Municipality in the Western Cape Province.

**Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) as the independent environmental impact assessment practitioner (EAP).

**ERM has submitted two separate Draft EIA Reports to the Department of Forestry, Fisheries and the Environment (DFFE).**

**Invitation to Comment:** Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which are available for public review and comment, from **Friday 23 August 2024 until the Monday, 23 September 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
<b>Electronic Copy Locations (Available for download below)</b>	
<b>ERM Website (available for download)</b>	<a href="https://www.erm.com/hugoandkhoe/">https://www.erm.com/hugoandkhoe/</a>
<b>Via One Drive</b>	I&APs can request for copies to be sent via one drive shared folder.
<b>Hard Copy Location</b>	
<b>De Doorns Public Library</b>	7 Station Road, De Doorns, Western Cape, South Africa
<b>CD Copies will be made upon request to the EAP.</b>	

<b>Should you wish to be registered as an I&amp;AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:</b>	
<b>Environmental Resources Management Southern Africa (Pty) Ltd</b>	ERM Southern Africa (Pty) Ltd. 1 <sup>st</sup> Floor Great Westerford 240 Main Road, Rondebosch Cape Town, 7700 South Africa
<b>Project Reference:</b> 0695823 Hugo&Khoe WEF	<b>Contact Person:</b> Sadiya Salie
<b>Email:</b> hugokhoe@erm.com	<b>Telephone:</b> +27117985400
<b>Post:</b> Postnet Suite 90, Private Bag X12, Tokai, 7966	<b>Online:</b> <a href="https://hugokhoe.aidaform.com/stakeholder-engagement">https://hugokhoe.aidaform.com/stakeholder-engagement</a>

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Thank you for the interest in the project.

Please feel free to contact the undersigned should you have any queries.

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

Stephanie Gopaul

Registered EAP

Environmental Resources Management Southern Africa (Pty) Ltd

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 13 September 2024 14:14:54

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Please note that I am on sick leave from 10 to 13 September 2024. For urgent matters, please email Martina on [phirim@ntcsa.co.za](mailto:phirim@ntcsa.co.za). Thanks

**Disclaimer**

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed [here](#).



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 16 September 2024 12:41:17  
**Attachments:** [image001.png](#)

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Hi Brandon,

Thank you for informing us. We will send a USB, consisting of both EIAs as soon as possible.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, September 16, 2024 12:25 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Hi Sadiya Salie

Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General.

The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that.

As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy.

The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network.

CD or USB we can still put on a physical file.

With many thanks and kind regards

**Brandon Layman**

Administrative Assistant to:

Cor Van der Walt : LandUse Manager

Department of Agriculture

Provincial Government of the Western Cape

Private Bag X1

ELSENBURG

7607

GPS koördinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road



Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)

Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** 30 August 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com).  
[Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23

September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.

The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.

If you are not the intended recipient you may not copy or deliver this message to anyone."

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 14:49:34  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---

**EXTERNAL MESSAGE**

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla

**B&C: Biodiversity Mainstreaming & EIA**

Department of Forestry, Fisheries and the Environment

Environment House

473 Steve Biko and Soutpansberg Streets

PRETORIA

[REDACTED]  
[REDACTED]  
[REDACTED]



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe

Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

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Please indicate which application your comment in respect of.

Thank you and regards,



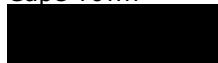
**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 14:56:32  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 19, 2024 2:46 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA  
[REDACTED]  
[REDACTED]  
[REDACTED]



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

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Thank you,

Kind Regards



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Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the



proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



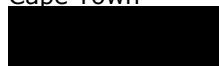
**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 15:02:42  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

---



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 19, 2024 2:46 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards*



Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[REDACTED]  
[REDACTED]  
[REDACTED]



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

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, 13 September 2024 14:12

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
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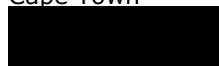
**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Thursday, 19 September 2024 15:05:40  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Hugo DEIR comments.pdf](#)  
[Khoe DEIR comments.pdf](#)

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**EXTERNAL MESSAGE**

Good day

Our telephone conversation refers.

This email confirms the minor error on the comment's letters with regard to the number of turbines. The correct number of turbines for Hugo are 42 turbines with the out put of 336MW and 29 turbines with the output of 232MW for Khoe.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[REDACTED]  
[REDACTED]  
[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Thursday, 19 September 2024 14:46  
**To:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Please find attached comments for the aforementioned project.

Thanks & Regards 

Ms. Mashienyane Portia Makitla

**B&C: Biodiversity Mainstreaming & EIA**

Department of Forestry, Fisheries and the Environment

Environment House

473 Steve Biko and Soutpansberg Streets

PRETORIA

[REDACTED]  
[REDACTED]  
[REDACTED]



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

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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

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[REDACTED]

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Thank you,

Kind Regards

**Sadiya Salie**



**ERM**

Sustainability is our business

Consultant

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More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,

**Sadiya Salie**  
Consultant



**ERM**

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---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town





**Subject:** Drie Kuilen Nature Reserve's Comment to Draft EIA Reports for Proposed Hugo and Khoe Wind Energy Facilities

**Date:** 2024/09/19

**To:**

ERM Southern Africa (Pty) Ltd.  
1 st Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
Cape Town,  
7700  
South Africa

This letter serves as a formal comment from **Drie Kuilen Nature Reserve** regarding the **Draft Environmental Impact Assessment (EIA) Reports** for the proposed Hugo and Khoe Wind Energy Facilities near De Doorns, Western Cape Province, dated August 2024. We are submitting this comment under the **Public Participation Process (PPP)** in accordance with the requirements of Section 24(5) and Chapter 6 (41, 42, 43, and 44) of **GN R. 326 of the National Environmental Management Act (NEMA), 1998**, and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

### **Summary of Concerns**

As the custodians of Drie Kuilen Nature Reserve, a formally protected area and eco-tourism destination located 3 km east of the proposed development site, we strongly oppose the construction of these wind energy facilities. Our concerns are based on the following key impacts:

1. **Biodiversity Risks:** The development poses severe threats to endangered and vulnerable species in the area, particularly the riverine rabbit, Verreaux's eagle, blue crane, and others.
2. **Visual and Scenic Landscape:** The facilities will significantly disrupt the natural landscape that is crucial for eco-tourism, which forms the backbone of our economic activities.
3. **Economic Impact on Eco-Tourism:** The development will lead to a loss of income due to the visual and noise disturbances that will detract from the appeal of our reserve.
4. **Accessibility to the Reserve:** Closure of Nougaspoort Road during construction will negatively affect tourism.

### **Detailed Points of Objection**

#### **1. Biodiversity and Endangered Species**

Camera trap surveys conducted as part of the environmental assessment on the proposed site recorded several vulnerable and endangered species, including the

**riverine rabbit** and **grey rhebuck** (**Cape Nature Response, 7 February, 2024**).

These species are important indicators of the region's ecological health. However, the collision risk modeling identified significant risks to species of conservation concern, including the **blue crane** (*Anthropoides paradiseus*, **near-threatened**) and **Verreaux's eagle** (*Aquila verreauxii*, **vulnerable**), among others. The estimated mortality rates for these species, even with mitigation measures, remain unacceptably high (Final Avifaunal Impact Assessment, Dr. R.E. Simmons et al., 7 August 2024). These species (excluding riverine rabbit) have also been observed on Drie Kuilen Nature Reserve, raising concerns that the proposed wind farm could have a detrimental impact on the health and sustainability of their populations. We argue that the proposed location of the wind energy facilities will lead to irreparable harm to these species, and the project should be relocated to a more suitable site where these risks can be avoided.

## 2. Impact on Visual Landscape and Scenic Integrity

Drie Kuilen Nature Reserve is located within a UNESCO-recognized **Cape Floral Region**, and the natural beauty of the landscape is a primary attraction for tourists. The **Visual Impact Assessment (VIA)** concluded that the **Khoe Wind Energy Facility** would have a **very high negative impact** on protected areas, including Drie Kuilen. Despite mitigation measures, the turbines will be visible from key viewpoints such as **Klipstapels**, severely affecting the aesthetic and tranquil experience of our visitors (Visual Impact Assessment, Lourens du Plesis, July 2024).

The cumulative visual impact of both the Hugo and Khoe Wind Energy Facilities would result in an unacceptable loss of visual resources within the region (Social Impact Assessment, Tony Barbour, August 2024).

## 3. Economic Impact on Eco-Tourism

The primary income for Drie Kuilen Nature Reserve is derived from eco-tourism, which is heavily dependent on the area's natural and undeveloped landscape. Should the wind energy facilities be constructed, the disruptions to the views, tranquillity, and overall experience of the reserve will lead to a significant reduction in visitor numbers and a corresponding loss of revenue.

International studies on the impact of wind farms on tourism in scenic areas have found that the presence of large turbines can detract from the rural character of the region and negatively impact tourism revenue. In this case, the benefits of the proposed project are **not site-specific** and could be achieved in a less sensitive location, without compromising the economic viability of local tourism (Social Impact Assessment, Tony Barbour, August 2024).

## 4. Accessibility to the Reserve

We are concerned that the construction of this project will result in the temporary closure of a section of **Nougaspoort Road**, which is vital for tourism access to Drie Kuilen. The alternative route from Touws River is often inaccessible after heavy rains, which could severely impact visitor access and, consequently, our eco-tourism operations.

## Request for Action

Given the severe risks posed to biodiversity, the negative impact on the scenic landscape, and the potential economic losses to local eco-tourism, we strongly oppose the current proposal for the Hugo and Khoe Wind Energy Facilities. We urge the authorities to reject the project in its current form and consider relocating it to a more suitable area where the environmental and economic impacts will be minimized.

### **Conclusion**

We respectfully request that our concerns be fully considered in the final decision-making process for the Environmental Impact Assessment. Drie Kuilen Nature Reserve, as an important contributor to biodiversity conservation and eco-tourism, cannot support the proposed development due to the detrimental effects it will have on the region.

For further correspondence or queries, please contact:

Stefan Short  
SACNASP reg No. 152831  
Manager  
Drie Kuilen Nature Reserve

████████████████████  
██████████

Thank you for considering our comments.

Sincerely,  
Drie Kuilen Nature Reserve



# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Sunday, September 22, 2024 17:28 UTC

## What's your name?

*First Name*

Johan and Karen

*Last Name*

Kritzinger

## Who do you represent?

*Organisation*

Eximia Nature Reserve

*Designation*

Owners

## Your Email

johank@kapelainvestments.co.za

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*Street Address Line 2*

[REDACTED]

*City*

Cape Town

*State/Province*

Western Cape

*Zip Code*

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

We are the owners of the neighboring farm to the proposed Khoe Windfarm - Eximia (previously know as Kopbeenskloof)

## Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

## **What are your comments regarding the Hugo and Khoe WEF Facilities?**

### COMMENTRY BY EXIMIA NATURE RESERVE ON THE DRAFT ENVIROMENTAL IMPACT ASSESMENT FOR THE PROPOSED KHOE WINDFARM

We herewith register our objection to the proposed Khoe Windfarm project for the following reasons:

1. Visual Impact Assessment (VIA) - We agree with the report's conclusion that from a visual perspective the windfarm is **FATALLY FLAWED** for all the reasons and supporting evidence highlighted in the VIA.

In addition to the visual impact study and in support thereof we would like to highlight the following:

- The negative impact to the magnificent and uninterrupted vistas of the area.
- The lasting impact to the tranquil and undisturbed Karoo landscape and unique atmosphere.

2. Social Impact Assessment (SIA) - We agree with the Social Impact Assessment's findings of the extremely high negative cumulative impacts and therefore that the project is **FATALLY FLAWED** from a Social Impact perspective. We support this finding based on all the matters raised and expanded on in the SIA. We would like to make the following comments in support of the findings:

- Negative impact to currently expanding eco-tourism in the area between the N1 and the R62.
- The area falls within the Cape Flora Region which is a World Heritage Site recognised by UNESCO.
- Tourism is one of South Africa's and especially the Western Cape's fastest growing economies.
- The resultant negative impact on current and future sustainable job opportunities because of the negative impact the Windfarm project will have on the future growth of the eco and adventure tourism industry.
- The reduced likelihood of the future investment in eco and adventure tourism in the area.
- The development of the proposed Khoe WEF is not supported in the area to the south of the N1
- The report further points out that the area does not fall within the REDZ zone, a geographical area within which wind and solar projects can occur in concentrated zones within a 35 km radius.
- The Western Cape Provincial Spatial Development Framework highlights the importance to the province's landscape and scenic assets and the threat posed by large scale infrastructural developments such as wind farms.
- The Langeberg Spatial Development Framework also identifies the R318 as a scenic route and highlights the importance of preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture. Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction and promoting tourism.
- It is also important to note that the benefits associated with the Khoe WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.
- The Khoe wind farm in its current proposed form and structure will certainly place the continued investment at Eximia Nature Reserve at risk, eliminating its contribution to the eco-tourism and job creation in the area.

3. Biodiversity Impact Assessment (BIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.

Wildlife and floral communities face direct mortality due to increased traffic and human presence, coupled with illegal collection, poaching, and entrapment. Avifaunal and bat species also face collision risks with turbine blades.

The Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*)

occur on Eximia and would face these potential dangers.

4. The Avian Impact Assessment (AIA) - refers to the mortal danger to endemic and threatened birds of the area by the proposed windfarm.

Eximia Nature Reserve was never contacted by the team working on the AIA. We are also not sure whether the team physically visited the area or whether their study is merely a desk top based study. We base this on the fact that actual sightings are often made of certain endemic and threatened birds on Eximia Nature Reserve which are not referred to in the study.

For instance we often observe a breeding pair of Verreaux's Eagles with their juvenile hunting at Eximia Nature Reserve. In fact, we observed them hunting in their regular spot, today (22 September 2024) which is within the 3.0 km buffer range from turbines WTG32, WTG33 and WTG34 as required. Video footage is available for inspection.

We also often observe Black Harriers hunting in the area where turbine WTG37 is envisaged. It is therefore questionable whether the information used to arrive at the buffer zones and the overall findings and mitigation recommendations of the AIA are credible.

---

### **Protection of Personal Information (POPI) Act, Act 4 of 2013**

Yes

---

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Sunday, 22 September 2024 19:47:34  
**Attachments:** [COMMENTRY ON PROPOSED KHOE WINDFARM DRAFT EINVIROMENTAL IMPACT STUDY.docx](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day Sadiya

We would like to make sure that **we have been registered now** as Interested and Affected Party of the Hugo & Khoe WEF Ref 0695823.

We previously registered on the online platform , our names and comments were not included in the Draft Assessment Report.

We own the neighbouring farm to the farm Eendrag , where the Khoe Windfarm is envisaged.

Names: Johan and Karen Kritzinger

[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger

[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**To:** [Eleanor Richardson; ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Hugo WEF Draft EIA: SABAA response  
**Date:** Monday, 23 September 2024 09:13:22

---

Hi Eleanor,

Thank you for your feedback.

We have updated the final EIA Report, taking into consideration your comments. Please note it was not our intention to 'hide' the sensitivity of bats, thus we have revised the report to include the high sensitivity zones.

Please also note, we have not included bat and bird species under the Table 6.2, as these were assessed separately.

Kind Regards

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Sunday, August 25, 2024 2:23 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Hugo WEF Draft EIA: SABAA response

**EXTERNAL MESSAGE**

Dear Sadiya,

Thank you for your email advising me of the draft EIA for the Hugo WEF near De Doorns.

In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-dejar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-dejar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

*Website: [www.sabaa.org.za](http://www.sabaa.org.za)*



<< OLE Object: Picture (Device Independent Bitmap) >>

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Hugo WEF Draft EIA: SABAA response  
**Date:** Monday, 23 September 2024 09:13:39

---

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](#)**

[REDACTED]

[REDACTED]

---

**From:** Sadiya Salie

**Sent:** Monday, September 23, 2024 9:13 AM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

<Stephanie.Gopaul@erm.com>

**Subject:** RE: Hugo WEF Draft EIA: SABAA response

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Kind Regards

**Sadiya Salie**

Consultant

ERM 1st Floor, 240 Main Road Rondebosch, Great Westerford, Cape Town

**[erm.com](http://erm.com)**

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, August 25, 2024 2:23 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Hugo WEF Draft EIA: SABAA response

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In my opinion Stephanie Dippenaar of EkoVler/ Stephanie Dippenaar Consulting has done a good bat impact survey (09\_hugo\_bat\_report.pdf) and her resulting assessment of the situation is extremely competent.

Unfortunately, however, I do not believe that the Draft EIA ([https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823\\_hugo-wef-deiar\\_20240823.pdf](https://www.erm.com/globalassets/projects/hugo-khoe/hugo-23-aug/v1/0695823_hugo-wef-deiar_20240823.pdf)) Section 4.2.7 adequately summarises the bat report. That the whole site is High Sensitivity for bats is not mentioned: rather than Figure 4.3 a better map would have been Figure 34 (page 66) of the Bat Assessment. The most abundant species on the site (*Tadarida aegyptiaca*, at up to 91% in some places: bat assessment Figure 21) is not even mentioned and a strange point source (Table 4.2) is used instead. This seems to be a deliberate attempt to hide the potential impact of the WEF on bat populations of the area. Table 6.2: Animal species of conservation concern potentially present in the Hugo WEF PAOI does not include the potential bat species of conservation concern quite clearly listed in Table 3 of the Bat Impact Assessment. Page 143 "The ecology, avifauna, bat and aquatic specialists have all concluded that the development does not have unacceptable negative impacts that cannot be mitigated to a low or medium level of significance" does not adequately convey that the mitigation and micro siting of turbines for bats, as well as potential curtailment, are quite severe and could impact the viability of the wind farm during operation. The draft EIA could thus be misinterpreted by anyone reading only the DEIAr.

Given that the site is High Sensitivity for bats, with the immediate mitigation recommended depending on weather and season, and the risk of future curtailment, I feel

the Draft EIA does not adequately convey the risk that this site is to developers.

If this development goes ahead I would like a bat specialist (preferably Stephanie since she knows the site) to conduct a site visit during construction to check that all the recommendations have been implemented, and I would also like the bat specialist for operational monitoring to be appointed as soon as construction starts to allow for monitoring to start as soon as the first blades start turning.

Best wishes,

Eleanor Richardson

*Eleanor J. (Kate) Richardson MSc BCom Pr. Sci. Nat.*

*South African Bat Assessment Association*

Website: [www.sabaa.org.za](http://www.sabaa.org.za)



<< OLE Object: Picture (Device Independent Bitmap) >>









# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Sunday, September 22, 2024 17:28 UTC

## What's your name?

*First Name*

Johan and Karen

*Last Name*

Kritzinger

## Who do you represent?

*Organisation*

Eximia Nature Reserve

*Designation*

Owners

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*Street Address Line 2*

[REDACTED]

*City*

Cape Town

*State/Province*

Western Cape

*Zip Code*

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

We are the owners of the neighboring farm to the proposed Khoe Windfarm - Eximia (previously know as Kopbeenskloof)

## Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

## **What are your comments regarding the Hugo and Khoe WEF Facilities?**

### COMMENTRY BY EXIMIA NATURE RESERVE ON THE DRAFT ENVIROMENTAL IMPACT ASSESMENT FOR THE PROPOSED KHOE WINDFARM

We herewith register our objection to the proposed Khoe Windfarm project for the following reasons:

1. Visual Impact Assessment (VIA) - We agree with the report's conclusion that from a visual perspective the windfarm is **FATALLY FLAWED** for all the reasons and supporting evidence highlighted in the VIA.

In addition to the visual impact study and in support thereof we would like to highlight the following:

- The negative impact to the magnificent and uninterrupted vistas of the area.
- The lasting impact to the tranquil and undisturbed Karoo landscape and unique atmosphere.

2. Social Impact Assessment (SIA) - We agree with the Social Impact Assessment's findings of the extremely high negative cumulative impacts and therefore that the project is **FATALLY FLAWED** from a Social Impact perspective. We support this finding based on all the matters raised and expanded on in the SIA. We would like to make the following comments in support of the findings:

- Negative impact to currently expanding eco-tourism in the area between the N1 and the R62.
- The area falls within the Cape Flora Region which is a World Heritage Site recognised by UNESCO.
- Tourism is one of South Africa's and especially the Western Cape's fastest growing economies.
- The resultant negative impact on current and future sustainable job opportunities because of the negative impact the Windfarm project will have on the future growth of the eco and adventure tourism industry.
- The reduced likelihood of the future investment in eco and adventure tourism in the area.
- The development of the proposed Khoe WEF is not supported in the area to the south of the N1
- The report further points out that the area does not fall within the REDZ zone, a geographical area within which wind and solar projects can occur in concentrated zones within a 35 km radius.
- The Western Cape Provincial Spatial Development Framework highlights the importance to the province's landscape and scenic assets and the threat posed by large scale infrastructural developments such as wind farms.
- The Langeberg Spatial Development Framework also identifies the R318 as a scenic route and highlights the importance of preserving the character of the Langeberg, inclusive of the unique landscape of winelands, mountains, and agriculture. Promoting and protecting the landscape (natural and heritage) features of the Langeberg as part of the tourism attraction and promoting tourism.
- It is also important to note that the benefits associated with the Khoe WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.
- The Khoe wind farm in its current proposed form and structure will certainly place the continued investment at Eximia Nature Reserve at risk, eliminating its contribution to the eco-tourism and job creation in the area.

3. Biodiversity Impact Assessment (BIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.

Wildlife and floral communities face direct mortality due to increased traffic and human presence, coupled with illegal collection, poaching, and entrapment. Avifaunal and bat species also face collision risks with turbine blades.

The Vulnerable Leopard (*Panthera pardus*) and Near Threatened Grey Rhebok (*Pelea capreolus*)

occur on Eximia and would face these potential dangers.

4. The Avian Impact Assessment (AIA) - refers to the mortal danger to endemic and threatened birds of the area by the proposed windfarm.

Eximia Nature Reserve was never contacted by the team working on the AIA. We are also not sure whether the team physically visited the area or whether their study is merely a desk top based study. We base this on the fact that actual sightings are often made of certain endemic and threatened birds on Eximia Nature Reserve which are not referred to in the study.

For instance we often observe a breeding pair of Verreaux's Eagles with their juvenile hunting at Eximia Nature Reserve. In fact, we observed them hunting in their regular spot, today (22 September 2024) which is within the 3.0 km buffer range from turbines WTG32, WTG33 and WTG34 as required. Video footage is available for inspection.

We also often observe Black Harriers hunting in the area where turbine WTG37 is envisaged. It is therefore questionable whether the information used to arrive at the buffer zones and the overall findings and mitigation recommendations of the AIA are credible.

---

### **Protection of Personal Information (POPI) Act, Act 4 of 2013**

Yes

---

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: New Response for "Stakeholder Engagement"  
**Date:** Monday, 23 September 2024 11:06:46

---

**WARNING:** The sender of this email could not be validated and may not match the person in the "From" field.

**EXTERNAL MESSAGE**

I am on leave overseas (4-20 July). For urgent BBU matters contact [REDACTED] or send a WhatsApp voice note or text to [REDACTED] Thanks Rob

Disclaimer - University of Cape Town This email is subject to UCT policies and email disclaimer published on our website at <https://www.uct.ac.za/main/email-disclaimer> or obtainable from +27 21 650 9111. If this email is not related to the business of UCT, it is sent by the sender in an individual capacity. Please report security incidents or abuse via <https://csirt.uct.ac.za/report-incident>

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Monday, 23 September 2024 11:06:47  
**Attachments:** [COMMENTRY ON PROPOSED KHOE WINDFARM DRAFT EINVIROMENTAL IMPACT STUDY.docx](#)  
[image001.png](#)

---

Same here, they questioning the buffer zones.



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, September 22, 2024 7:47 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day Sadiya

We would like to make sure that we have been registered now as Interested and Affected Party of the Hugo & Khoe WEF Ref 0695823.

We previously registered on the online platform , our names and comments were not included in the Draft Assessment Report.

We own the neighbouring farm to the farm Eendrag , where the Khoe Windfarm is envisaged.

Names: Johan and Karen Kritzinger

Email : [Johank@kapelainvestment.co.za](mailto:Johank@kapelainvestment.co.za)

Contact Number: 083 611 1482 or 082 898 4527

Adress: 34 Sapphire Way, Belvedere, Cape Town 7979

I have attached our commentary

Kind regards

Karen and Johan Kritzinger  
[REDACTED]  
[REDACTED]





**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** RE: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 23 September 2024 11:31:31  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Thank you Portia,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 19, 2024 3:05 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

Our telephone conversation refers.

This email confirms the minor error on the comment's letters with regard to the number of turbines. The correct number of turbines for Hugo are 42 turbines with the out put of 336MW and 29 turbines with the output of 232MW for Khoe.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

**From:** [Redacted]  
**Sent:** Thursday, 19 September 2024 14:46  
**To:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)  
**Cc:** [Redacted]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Friday, 13 September 2024 14:12  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [Redacted]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



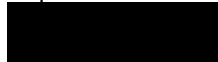
**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** RE: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 23 September 2024 11:31:35  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Thank you Portia,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 19, 2024 3:05 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Subject:** FW: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Good day

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Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

**From:** [Redacted]  
**Sent:** Thursday, 19 September 2024 14:46  
**To:** [HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)  
**Cc:** [Redacted]  
**Subject:** Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Good day

Please find attached comments for the aforementioned project.

*Thanks & Regards* 

Ms. Mashienyane Portia Makitla  
**B&C: Biodiversity Mainstreaming & EIA**  
Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
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**Cc:** [Redacted]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

Dear Interested and Affected Party,

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Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

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**Sent:** Friday, August 30, 2024 10:40 AM

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**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town







# Stakeholder Engagement

<https://hugokhoe.aidaform.com/stakeholder-engagement>

Monday, September 23, 2024 10:37 UTC

## What's your name?

*First Name*

H

*Last Name*

Kuhn

## Who do you represent?

*Organisation*

Self

*Designation*

Farm owner

## Your Email

[REDACTED]

## Your Phone Number

[REDACTED]

## Alternative Phone Number

[REDACTED]

## Your Address

*Street Address*

[REDACTED]

*Street Address Line 2*

[REDACTED]

*City*

[REDACTED]

*State/Province*

Western Cape

*Zip Code*

[REDACTED]

*Country*

South Africa

## What is your interest in the projects?

Affected neighbouring farm owner

**Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?**

Yes

## **What are your comments regarding the Hugo and Khoe WEF Facilities?**

Wind farm objections

1. Damage to infrastructure surrounding Wind farm during the process of erecting the Wind Farms
2. Aesthetically unpleasing
3. Noise pollution (aerodynamic noise/vortex & mechanical noise)
4. Shadow flickers
5. Wildlife: flying animals (currently there is a pair of endangered eagles in the mountains with fledglings, Blue crane birds, migrating ducks & geese, owls, bats, crows & hawks) Collisions with turbines, vacuum created pulls flying animals out of their current, turbines interfering with bat sonar navigation.
6. Disturbance to Fona & Flora
7. Affecting tourism, which this area highly relies on.
8. Lightning & Fire damage to turbines.
9. Wind-turbine syndrome due to possible fluctuations in air pressure, vibrations & infrasound - further research still undergoing but can't with 100% certainty be disregarded.

How is it that DK hasn't been informed or involved in any avian studies while being mentioned in the reports....

---

## **Protection of Personal Information (POPI) Act, Act 4 of 2013**

No

---

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Subject:** Automatic reply: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Wednesday, 25 September 2024 11:39:32

---

**EXTERNAL MESSAGE**

Good day

Thank you for your email, please note I am currently unavailable, and sick, will reponse in due course.

If your matter requires urgent attention, please contact please contact one of the officials:  
<https://www.hwc.org.za/node/1873>

Thank you for your understanding. I look forward to connecting with you upon my return.

If you do not get a reply from me within ten working days of my return please resend your query again.

Your email will be responded to in due course.

Kind regards,

Stephanie-Anne Barnardt  
Specialist Heritage Officer (Archaeologist)  
Heritage Western Cape

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

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The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.  
If you are not the intended recipient you may not copy or deliver this message to anyone."

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23102514SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: INTERIM COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED HUGE WEF ON REMAINDER OF FARM 145 (OU DE KRAAL), REMAINDER OF FARM 147 (STINKFONTEINS BERG), REMAINDER OF FARM 172 (STINKFONTEIN), FARM 173 (DRIEHOEK), REMAINDER OF FARM 174 (PRESENTS KRAAL) AND PORTION 9 OF FARM 148 (HELPMEKAARR), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

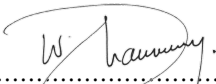
**INTERIM COMMENT:**

The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA but requires clarity on the degree to which the visual issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

**Straatadres:** Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Posbus 1665, Kaapstad, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23110807SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: FINAL COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED KHOE WEF ON PORTIONS 1, 2 AND 11 OF FARM 38 (EENDRAGT), FARM 193 AND REMAINDER OF FARM 37 (EENDRAGT), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.  
This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

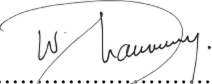
**FINAL COMMENT:**

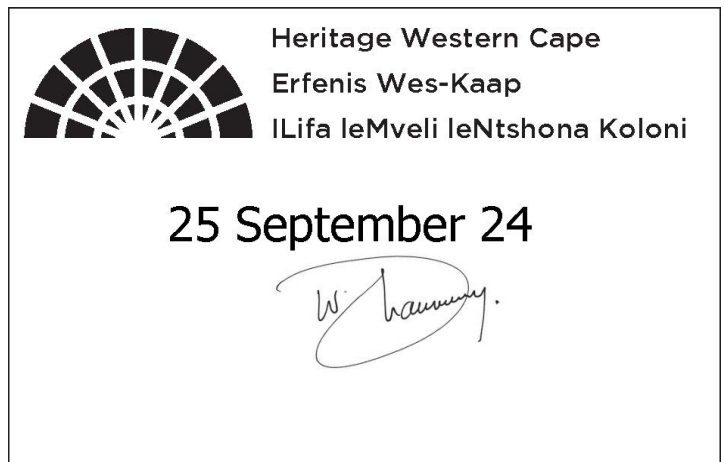
The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA, but does not support the proposed activity, given the anticipated impact of the activity upon the Cultural landscape.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

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**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

From: [Redacted]  
To: [Redacted]  
Subject: Re: New Energy (NE) Site  
Date: Monday, 20 September 2022 12:48

Hi John and Karen,

Thank you for providing your comments.

The recent surveys (two visits) were conducted by BHI over a 12-month period in 2021-2022. Among the Red Data (RD) species, 1014 flights were recorded in 462 hours in the WEF giving a high Passage Rate of 2.18 RD flights per hour; these were dominated by Blue Cranes (93% of all flights) and Verreaux's Eagles (7%). Among Least Concern (LC) species the Boned Eagles (Agelaius phoeniceus) were the most commonly recorded and the overall Passage Rate was 0.31 flights per hour.

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The highest risk areas (Class 1 and above) were strongly clustered in the eastern and northern sections, due mainly to high flight rates of Blue Cranes and Verreaux's Eagles. The risk threshold (class Class 10) encompassed more than 77% of only flights (Verreaux's Eagles and Black Terns), and 90% of each flight for six of the seven species. The areas are classified as too risky for development and allocated as No-GO areas.

These high-risk areas covered 47% of the area, leaving 53% of the area classified as medium- or low-risk in the Priority birds record, mainly in the south-west of the study site. Turbines in areas classified as risk Class 4 require one or more mitigation: either patterned-baffles or shut-down-on-demand (SDOD) – automated, or human-led. Those in Class 4 require no extra mitigation. Should one Critically Endangered or Endangered bird be killed per year at any turbine then an additional set of mitigation must be applied. For Other Red Data species, the threshold requiring mitigation is 1 x turbine depending on the species.

Since the application has optimised that turbines layout to avoid all high-risk areas, and to minimise turbines in medium-risk areas, no presented here, than facilities of all Priority species are expected to drop to < 0.1 birds/year for Black Terns (BT), Blue Crane (BC), and Martial Eagle (ME) and < 0.4 birds/year for Verreaux's Eagle (VE), Jackal Buzzard (JB) and Boned Eagle (BE). That is less than one family every 10 years (BE, BC and ME) or less than one every 2.5 years (VE, JB and BT).

Thus, by avoiding the risk areas and the spatially explicit model and re-allocating turbines away from high-risk areas, facility estimates can be reduced between 7.6-fold (Blue Crane) and 6.4-fold (Black Terns) to 5.4-fold and 6.1-fold for Martial and Verreaux's Eagles, respectively. This the developer has undertaken and thereby reduced the predicted fatalities substantially.

Note the presence of a precautionary buffer for a Martial Eagle nest discovered during field work just outside the north-eastern boundary. Had this nest been active, a buffer of 7 km would have been required (D G Tar, FWI). However, observations throughout the year, and the CRM outputs, both indicate little activity. Therefore the buffer has been reduced to a precautionary 7 km, on the possibility that it becomes active in future years. This buffer also encompasses a sighting of an adult and young Black Terns, but for which no nest site could be confirmed.

Kind Regards  
Sudhoo Saha  
Consultant ERM Ltd Floor, 248 Main Road, Brookwood, Great Waterford, Cape Town  
tel: +27 21 681 5400  
+27 21 781 0910  
---Original Message---  
From: john@reddata.com (john@reddata.com)  
Sent: Sunday, September 22, 2024 12:21 PM  
To: ERM@engr.khwa-wind-energy.co.za (saha@reddata.com)  
Subject: New Response for "Reddata@reddata.com"

[You don't often get email from john@reddata.com. Learn why this is important at <https://mail.google.com/mail/u/0/notifications/>]

EXTERNAL MESSAGE:

Dear Aida@ferns user,

Your form "Reddata@reddata.com" has a new response.

1. What's your name?  
John and Karen Kretzinger

2. Who do you represent?  
Exxos Nature Reserve - Owners

3. Your address  
[Redacted]

4. What's your interest in the project?  
We are the owners of the neighbouring farm to the proposed Khwa-Windfarm - Exxos (previously known as Kogelbuisbos)

5. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?  
Yes

6. What are your comments regarding the Khwa and Khwa WEF Facilities?  
COMMENTARY BY EXXOS NATURE RESERVE ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED KHWA WINDFARM We have reviewed our objection to the proposed Khwa project for the following reasons:

1. Visual Impact Assessment (VIA) - We agree with the report's conclusion that from a visual perspective the windfarm is FATALY FLAWED for all the reasons and supporting evidence highlighted in the VIA.

In addition to the visual impact study and to support thereof we would like to highlight the following:

- The negative impact to the unimpacted and unimpacted Exxos landscape and unique attributes.
- The being impact to the unimpacted and unimpacted Exxos landscape and unique attributes.
- Social Impact Assessment (SIA) - We agree with the Social Impact Assessment's findings of the extremely high negative cumulative impacts and therefore that the project is FATALY FLAWED from a Social Impact perspective. We support this finding based on all the matters raised and expanded on in the SIA. We would like to make the following comments in support of the findings:
  - Negative impact to currently expanding eco-tourism in the area between the NI and the R2.
  - The area falls within the Cape Floral Region which is a World Heritage Site designated by UNESCO.
  - Tourism is one of South Africa's and especially the Western Cape's fastest growing economic.
  - The combined negative impact on current and future sustainable job opportunities because of the negative impact the Windfarm project will have on the future growth of the area and subsequent tourism industry.
  - The reduced likelihood of the future investment in eco and adventure tourism in the area.
  - The development of the proposed Khwa WEF is not supported in the area to the south of the NI.
  - The report further points out that the area does not fall within the REDD zone, a geographical area within which wind and solar projects can occur in concentrated areas within a 35 km radius.
  - The Western Cape Provincial Spatial Development Framework highlights the importance to the province's landscape and scenic assets and the danger posed by large scale infrastructure development such as wind farms.
  - The Langheylsfontein Development Framework also identifies the R21 as a scenic route and highlights the importance of preserving the character of the Langheylsfontein, including the unique landscape of mountains, mountains, and agriculture. Preserving and protecting the landscape (natural and heritage) features of the Langheylsfontein is part of the tourism attraction and promoting tourism.
  - It is also important to note that the benefits associated with the Khwa WEF are not site dependent and would also be associated with an alternative site. This point is relevant given the environmental and social sensitivity of the study area.
  - The Khwa Windfarm is a current proposed farm and currently places the continued development of Exxos Nature Reserve at risk, diminishing the contribution to the eco-tourism and job creation in the area.
  - Irreversible Impact Assessment (RIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.
  - Wildlife and forest communities face direct mortality due to increased traffic and human presence, coupled with illegal collection, poaching, and poaching. Irreversible and hot species also face collisions with turbines blades.
  - The Vulnerability Impact Assessment (VIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.
- The Visual Impact Assessment (VIA) - We concur with the extremely negative impact on re-wilding and nature rehabilitation projects underway in the region as highlighted in the biodiversity report.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 Yes

You can turn off or manage notifications for this form at <https://reddata.com/notifications>

Stop productive and safe care? Visit Aida@ferns.com





**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Wednesday, 25 September 2024 12:17:17  
**Attachments:** [image001.png](#)

---

Hi Karen,

You have been included to the database for the EIA phase.

Kindly note I have sent Responses to your comments provided.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, September 22, 2024 7:47 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <hugokhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day Sadiya

We would like to make sure that **we have been registered now** as Interested and Affected Party of the Hugo & Khoe WEF Ref 0695823.

We previously registered on the online platform, our names and comments were not included in the Draft Assessment Report.

We own the neighbouring farm to the farm Eendrag, where the Khoe Windfarm is envisaged.

Names: Johan and Karen Kritzinger

[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger

[REDACTED]

[REDACTED]

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)  
**Date:** Wednesday, 25 September 2024 12:17:12  
**Attachments:** [image001.png](#)

---

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**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, September 22, 2024 7:47 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[hugokhoe@erm.com](mailto:hugokhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Comment as I&AP on Khoe WEF - EXIMIA Nature Reserve (previously Kopbeenskloof)

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

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Names: Johan and Karen Kritzinger  
[REDACTED]  
[REDACTED]  
[REDACTED]

I have attached our commentary

Kind regards

Karen and Johan Kritzinger

[REDACTED]

[REDACTED]

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23102514SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: INTERIM COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED HUGE WEF ON REMAINDER OF FARM 145 (OU DE KRAAL), REMAINDER OF FARM 147 (STINKFONTEINS BERG), REMAINDER OF FARM 172 (STINKFONTEIN), FARM 173 (DRIEHOEK), REMAINDER OF FARM 174 (PRESENTS KRAAL) AND PORTION 9 OF FARM 148 (HELPMEKAARR), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

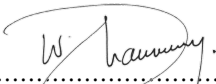
**INTERIM COMMENT:**

The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA but requires clarity on the degree to which the visual issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



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**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23110807SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: FINAL COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED KHOE WEF ON PORTIONS 1, 2 AND 11 OF FARM 38 (EENDRAGT), FARM 193 AND REMAINDER OF FARM 37 (EENDRAGT), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.  
This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

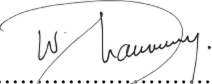
**FINAL COMMENT:**

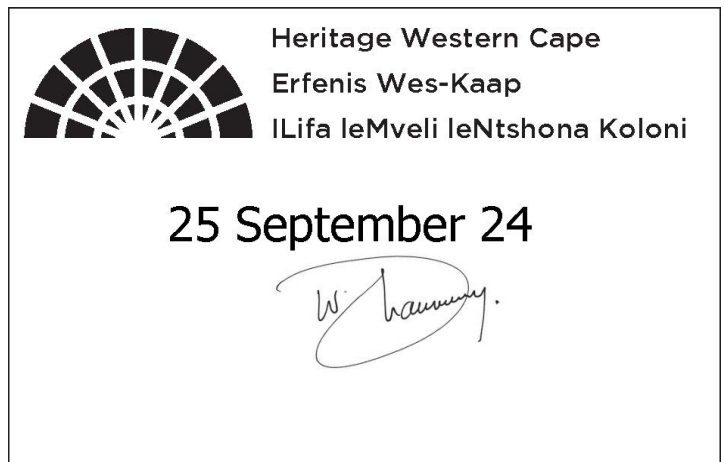
The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA, but does not support the proposed activity, given the anticipated impact of the activity upon the Cultural landscape.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



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**References:**

- 16/3/3/6/4/1/2/B2/3/1441/24 (Development Management)
- 18/2/3/2024-2025 (Development Facilitation)
- 19/3/2/4/B2/3/DDF087/23 (Pollution and Chemicals Management)
- 19/2/5/3/B2/3/WL0015/24 (Waste Management)
- 19/4/4/1/BB3 – Hugo Wind Energy Facility, De Doorns (Air Quality Management)

**Attention:** Ms Stephanie Gopaul

Environmental Resources Management Southern Africa (Pty) Ltd  
1<sup>st</sup> Floor, Great Westerford  
240 Main Road  
**Rondebosch**  
7700

[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)

Dear Madam

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE UP TO 336MW HUGO WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF FARM OU DE KRAAL NO. 145, REMAINDER OF FARM STINKFONTEINS BERG NO. 147, REMAINDER OF FARM STINKFONTEIN NO. 172, FARM DRIEHOEK NO. 173, REMAINDER OF FARM PRESENTS KRAAL NO. 174 AND PORTION 9 OF FARM HELPMEEKAAR NO. 148, DE DOORNS, BREEDE VALLEY MUNICIPALITY (DFFE REF: 14/12/16/3/3/2/2515)**

1. The Draft Scoping Report ("DSR") dated December 2023, the Department's comments thereto dated 09 February 2024, and the email notification of 23 August 2024 regarding the availability of the Draft Environmental Impact Assessment ("EIA") Report, refer.
2. The Department sincerely apologises for the delay in submitting its comments on the Draft EIA Report and acknowledges that its comments will not be considered by the environmental assessment practitioner ("EAP") due to legislative timeframes for the submission of the Final EIA Report. It is however hoped that the competent authority will consider the comments during its decision-making process. Furthermore, based on the **interim comments** received from Heritage Western Cape ("HWC") dated 25 September 2024 (their reference HM/CAPE WINELANDS/ BREEDE VALLEY & LANGE BERG / TOUWSRIVER & MONTAGUE/ VARIOUS FARMS), requiring clarity "*on the degree to which the visual*

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Department of Environmental Affairs and Development Planning  
Cape Town Office: Utilitas Building, 1 Dorp Street Cape Town, 8001  
George Office: York Park Building, 93 York Street, George, 6529



issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment", the Department recommends that a Revised EIA Report be released for comments by registered interested and affected parties, per regulation 23(1)(b) of the EIA Regulations, 2014 (as amended). Final comments from HWC must be obtained and submitted with the Final EIA Report.

3. Please find collated comments from various directorates within the Department on the Draft EIA Report dated 23 August 2024 that was downloaded from an online link provided by the EAP and available on the EAP's website.

Directorate: Development Management (Region 1) – Ms Samornay Smidt (Email: [REDACTED])

4. Based on most of the specialists' findings, no fatal flaws were identified which should prevent the proposed Hugo wind energy facility ("WEF") from proceeding, subject to adherence to the recommended mitigation measures during all phases of implementation. This is however with the exception of the findings of the Visual Impact Assessment ("VIA") compiled by LOGIS dated July 2024 (and supported by the findings of the Social Impact Assessment') that confirmed the very high to high negative visual impact associated with the proposed Hugo WEF, and that it will only be supported from a visual perspective if the mitigation measures are implemented, the layout adjusted accordingly, and all best practice mitigation measures as provided in the VIA are implemented.
  - 4.1. The EAP's response motivated that *"adjustments to turbine placement was made based on the outcome of the visual impact assessment. Despite these efforts, some opposition persists. The turbines located in high sensitivity areas are positioned there to take advantage of the optimal wind resource. Relocating or removing these turbines would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition... Although the wind farm's visual impact on residents and tourism is high, the decision to proceed with its development is motivated by its considerable environmental and economic benefits. The project will contribute to the aforementioned frameworks, Western Cape Green Economy Strategy and Just Energy Transition and this transition is important to the country and to the future growth and sustainability as an organisation."*
  - 4.2. The responses of the EAP are noted; however, due to the very high to high negative visual impact, this Directorate **does not the support** the proposed development.
  - 4.3. it is vital that a final comment is obtained from HWC on the specialists' findings, to confirm whether the heritage, socio-economic and visual impacts associated with the proposed development have been adequately assessed and addressed, and that the recommended mitigation measures have been incorporated to ensure that the impact significance is reduced to an acceptable level. It is noted that effective mitigation to reduce the significance of the visual impact is not achievable.
5. Further to the above, the need and desirability of the project must be adequately demonstrated and motivated, especially given that the entire extent of the site falls outside the Komsberg Renewable Energy Development Zone ("REDZ"), which, from a long-term planning perspective, may not be ideal, specifically given the environmental and scenic qualities of the area.
6. Written confirmation of available capacity to provide the required services to the proposed development must be obtained from the local authority and/or relevant service provider(s).



7. The Department of Water and Sanitation must confirm whether a general authorisation or a water use licence will be required for the water uses triggered in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998).
8. Comments from all relevant organs of state should be obtained, included, and adequately addressed in the Final EIA Report.
9. The public participation process must comply with the requirements of regulation 41 of the EIA Regulations, 2014 (as amended) and proof of compliance with all the steps undertaken must be included in the Final EIA Report.

Directorate: Development Facilitation – Ms Adri La Meyer [REDACTED]  
[REDACTED]

10. This Directorate **objects to and does not support** the proposed activities as we believe that the very high and high negative visual impacts on the area's sense of place cannot mitigate the development's low and medium (negative and positive) impacts. Sustainable development requires the consideration of all relevant factors, including that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, be minimised and remedied; and that where the negative impacts on people's environmental rights cannot be altogether prevented, it be minimised or remedied to an acceptable level. The significance of the impact of the Hugo WEF on tourism activities was rated as medium negative with and without mitigation. In addition, several landowners raised concerns relating to the potential visual impact of the proposed Hugo WEF on the areas' sense of place and tourist-related activities. The VIA noted that the overall suitability of the area from a visual perspective is a concern, with cumulative impacts rated as very high negative, which heightens the concern. The VIA notes that owing to the sensitivity of the landscape, the high visual quality, and the potential visual impacts on sensitive visual receptors, the cumulative visual impact is not considered to be within acceptable limits. The very high to high negative visual impact during the construction and operational phases; the operational phase impact of bird collision with turbine blades, habitat alteration, and displacement that has a significance rating of high negative pre-mitigation and moderate-high negative post mitigation; and the direct collision or barotrauma of bats during the operational phase resulting in a high negative impact (pre- and post-mitigation), renders the project proposal undesirable.
11. The National Department of Environmental Affairs' Guideline on Need and Desirability (first version published in terms of section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") in 2014, and second version in 2017) requires that "*When formulating project proposals and when evaluating project specific applications, the strategic context of such applications and the broader societal needs and the public interest should be considered.*" This Directorate respectfully submit that the EAP's argument that relocating or removing turbines in high sensitivity areas "*would render the project unfeasible and undermine its support for the green economy strategy and the just energy transition*", is not a valid argument had the applicant and EAP considered the **strategic context** of the proposed development and the broader societal needs and interests.

12. The Guideline on Need and Desirability (2017) further notes that the concept of “*“need and desirability” relates to, amongst others, the nature, scale and location of development being proposed, as well as the wise use of land”* (own emphasis). This Directorate believes that is not the right time nor the right place (outside of a REDZ) to have this type of land-use/activities. As such, this Directorate recommends that the competent authority adopt a **risk-averse and cautious approach**, which considers the limits of current knowledge about the consequences of decisions and actions.
13. This Directorate is willing to reconsider its comments and objections if the recommendations of the VIA can be met: *“The proposed Hugo Wind Energy Facility will only be supported from a visual perspective if the conditions listed below are implemented, the layout adjusted accordingly and all best practice mitigation measures, as provided in this report are implemented and adhered to:*
  - *Turbines labelled WTG 18, 19, 21, 23, 27 and 28 in the east be relocated outside of areas marked as mountains and tall hills (high sensitivity)*
  - *Turbines labelled WTG 1, 2, 3, 9, 10, 11 and 12 in the west be reconsidered and located outside of areas marked as mountains and tall hills (high sensitivity)*
  - *While no turbines are located within the stipulated 500 m buffer from the R318, it should be noted that the Breede Valley local municipality and the Langeberg spatial development framework considers the R318 to be a scenic route. Therefore the implementation of a 1 km buffer along this route is considered to be preferable by the visual specialist”.*
14. This Directorate's comments on the DSR noted that several solar energy facilities are approved and proposed within 30km radius of the proposed site and recommended that the Draft EIA Report provide a description why the proposed WEF is the preferred renewable energy technology alternative. Section 7.5 of the Draft EIA Report states that *“a solar electricity generation would require a much greater infrastructure footprint and water consumption (for cleaning panels) to generate the equivalent energy of the proposed WEF”*. Please indicate the average wind speed on the site against the Global Horizontal Irradiation for the site to substantiate the preferred technology alternative.
15. According to the Animal Species Specialist Assessment Report compiled by ERM Southern Africa (Pty) Ltd dated 08 August 2024, 63 records of critically endangered Riverine Rabbit were recorded at three sampling locations (HCT01, HCT02 and HCT04) placed in natural/ near-natural vegetation and recovered vegetation on previously modified land. Please confirm that no wind turbines, associated infrastructure or structures will be developed near of within this species' habitat, as this could not be ascertained from the Animal Species Specialist Assessment Report.
16. In terms of the Environmental Management Programme (“EMPr”) for the proposed Hugo WEF, both the Draft EIA Report and EMPr state that for the operational phase, *“All recommendations in the Terrestrial Animal Specialist Assessment must be adhered to”*. It is recommended that the recommendations of the Animal Species Specialist Assessment Report not included in the EMPr, be indicated/included in the EMPr for completeness.
17. General:
  - 17.1. Please confirm the width of internal and access roads. Pages 47, 89 and 231 refer to internal roads with a width of 4.5m, whereas page 85 refers to widths of 8m -10m.
  - 17.2. Reference to the Langeberg Integrated Development Plan (“IDP”) (page 154) must be replaced with Breede Valley IDP.

- 17.3. Please include in the WEF EMPr the recommendation that in the event of archaeological resources being encountered during development, work within 50m of the find must be halted and the find reported to the environmental control officer. Please further amend the Generic EMPr for substation infrastructure to specifically refer to 50m.

Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email: [REDACTED])

18. It is mentioned in the Draft EIA Report that water requirements for the proposed development may be sourced from the landowner's existing boreholes on the site or from new boreholes that will be drilled. Details, such as depth to groundwater, location of the borehole and water rights allocation, should be furnished for these borehole/s.

Directorate: Waste Management – Mr Muneeb Baderoon (Email: [REDACTED])

19. Noise, dust, spill prevention and remediation, waste management, ablution facilities' location and maintenance, fuel storage, and audit frequency are all covered sufficiently in the EMPr.
20. The EMPr states that vegetation will be removed and is addressed in detail. The relevant municipality must be consulted regarding the suitable handling of vegetation in terms of its Organic Waste Management Plan. Vegetation may not be burned or disposed of on adjacent land.

Directorate: Air Quality Management – Mr Mzolisi Benxa [REDACTED]

21. Dust generated from all the phases of the proposed activities must comply with the National Dust Control Regulations published in Government Notice No. R. 827 of 1 November 2013 and promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health. Although indicated in the Draft EIA Report, please also include this in the WEF EMPr.
22. Dust may be generated from cleared, bare and blasted areas, as well as from large vehicles and equipment traversing and operating on-site during the construction phase. This Directorate recommends that measures to monitor and prevent fugitive dust emissions be mitigated strictly as per the recommendations stipulated in the EMPr.
23. Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013.
24. Large vehicles traversing on-site, machinery being used, as well as wind turbine generators may cause significant noise; these activities may become a noise nuisance and/or disturbance to the surrounding communities. The Draft EIA and Environmental Noise Impact Assessment compiled by Enviro-Acoustic Research cc dated 21 May 2024 indicate that noise sensitive reception ("NSR") H-13 and NSR H-6 will

experience greater noise impacts during the construction phase, with NSR H-6 being the most affected during the operational phase, as outlined in the reports.

- 24.1. Measures to monitor and prevent noise nuisance and disturbance must be strictly implemented as per the EMPr.
- 24.2. The applicant must explore long-term noise control strategies for NSR H-6 during the operational phase (e.g. the installation of sound barriers, adjusting operational practices to reduce noise, etc.).
- 24.3. Regular noise monitoring must be undertaken to ensure compliance with acceptable noise levels during both the construction and operational phases.
  
25. Potential air emissions will be in the form of dust pollution from construction vehicles and equipment operating on-site during the construction and operational phases. All potential air pollutants on site need to be monitored and if causing significant emissions, must be mitigated strictly as per the recommendations stipulated in the Draft EIA Report and EMPr.
  
26. Please note that the abovementioned recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by this Directorate should in no way be regarded as an indication or confirmation that additional information or documents will not be requested.
  
27. The applicant is reminded of its "*general duty of care towards the environment*" as prescribed in section 28 of the NEMA, 1998 which states that "*Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.*"

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

*pp* **HEAD OF DEPARTMENT**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Letter signed by:

**Thea Jordan**

Director: Development Facilitation

**Date: 26 September 2024**

CC: (1) Ms Azrah Essop (DFFE)  
(2) EIA Admin (DFFE)

████████████████████  
████████████████████

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#); [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)  
**Date:** Thursday, 26 September 2024 16:55:42  
**Attachments:** [image003.png](#)  
[2024 Sept 26 - Draft EIA Report for the proposed 336MW Hugo WEF near De Doorns.pdf](#)

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**EXTERNAL MESSAGE**

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan

Pr. Pl. (A/1237/2002)

**Director: Development Facilitation**

Department of Environmental Affairs and Development Planning

Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

[REDACTED]  
Website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)



Be 110% Green. Read from the screen.

Should you not be able to contact the number above, please call +27 (0)21 483 4091 between 07:30-16:00.

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 23, 2024 15:32

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town

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If you are not the intended recipient you may not copy or deliver this message to anyone."

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#); [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 12:29:27  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, September 25, 2024 12:10 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya  
Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Wednesday, September 25, 2024 11:47 AM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com). [Learn why this is important](#)  
Hi Waseefa,



I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

To: [REDACTED]

Cc: [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**

**Application forms 2024:**  
[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town

---

**From:** Stephanie Barnardt <[Stephanie.Barnardt@westerncape.gov.za](mailto:Stephanie.Barnardt@westerncape.gov.za)>

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend**

**your query**

**Kind regards,**

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**Stephanie-Anne Barnardt-Delpont**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation

(2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

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Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

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Cape Town

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#); [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 12:29:19  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** [Redacted]  
**Sent:** Wednesday, September 25, 2024 12:10 PM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Wednesday, September 25, 2024 11:47 AM  
**To:** [Redacted]  
[Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,



I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

To: [REDACTED]

Cc: [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

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**Kind regards,**

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** [REDACTED]

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** [REDACTED]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

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**your query**

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**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delpont**  
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Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation

(2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Hugo Wind Energy Facility - Worcester  
**Date:** Friday, 27 September 2024 12:29:35  
**Attachments:** [image002.png](#)

---



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Tuesday, August 20, 2024 1:27 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Hugo Wind Energy Facility - Worcester

Good day

Thank you for your comment, these have been taken into consideration into the EMPr.

Kind Regards



**ERM**

Sustainability is our business

---

**From:** [REDACTED]

**Sent:** Monday, May 6, 2024 4:02 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](#)>

**Cc:** [REDACTED]

**Subject:** Hugo Wind Energy Facility - Worcester

You don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

---

Hi Khosi Ngema  
Please find attach comments from the WCDoA: LUM.

With many thanks and kind regards



Department of Agriculture  
Provincial Government of the Western Cape  
Private Bag X1  
ELSENBURG  
7607  
GPS koordinate Elsenburg kantoor: 33.845259 S 18.834722 E.

2<sup>nd</sup> Floor, Main Building, Muldersvlei Road



Departmental Website: [www.elsenburg.com](http://www.elsenburg.com)  
Provincial Website: [www.capegateway.gov.za](http://www.capegateway.gov.za)



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If you are not the intended recipient you may not copy or deliver this message to anyone."



**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#); [Stephanie Barnardt](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 12:59:03  
**Attachments:** [image001.png](#)  
[image002.png](#)

Some people who received this message don't often get email from [REDACTED]  
[Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC.

These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

**[HWC Committee Schedule 2024](#)**

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from hugokhoe@erm.com. [Learn why this is important](#)

Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** Waseefa Dhansay <[Waseefa.Dhansay@westerncape.gov.za](mailto:Waseefa.Dhansay@westerncape.gov.za)>

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

[Redacted Signature]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:47 AM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [Redacted]. [Learn why this is important](#)

Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** Stephanie Barnardt <[Stephanie.Barnardt@westerncape.gov.za](mailto:Stephanie.Barnardt@westerncape.gov.za)>

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** Stephanie Barnardt <[Stephanie.Barnardt@westerncape.gov.za](mailto:Stephanie.Barnardt@westerncape.gov.za)>

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query**

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** Sadiya Salie <[Sadiya.Salie@erm.com](mailto:Sadiya.Salie@erm.com)>  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
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use of the named recipient only, except where the sender specifically states otherwise.  
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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 13:02:42  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi John,

Hope you well.

Can you please assist with the below?

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 12:59 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC.

These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

**HWC Committee Schedule 2024**

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]

ERM Hugo & Khoe Wind Energy

Facilities <HugoKhoe@erm.com>; [REDACTED]

[REDACTED]

Cc: [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[REDACTED]

**From:** [REDACTED]

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:47 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** [Redacted]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

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Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)





---

**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 13:09:10  
**Attachments:** [image001.png](#)  
[image005.png](#)

---

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 12:59 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Sadiya

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Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC. These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim

comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

**HWC Committee Schedule 2024**

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

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Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

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**ERM**

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**Sadiya Salie**  
Consultant

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

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**From:** [Redacted]

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

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Protea Assurance Building Greenmarket Square, Cape Town

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[Redacted]

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**From:** [Redacted]  
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**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [Redacted]  
[Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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I trust you are well.

Are you able to please advise on the below.

Kind Regards



**Sadiya Salie**  
Consultant

---

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Wednesday, September 25, 2024 11:39 AM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]

[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
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Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

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Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED] ERM Hugo & Khoe Wind Energy Facilities



<HugoKhoe@erm.com>

Cc: [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

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Kind regards,

**Application forms 2024:**

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Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** Sadiya Salie <[Sadiya.Salie@erm.com](mailto:Sadiya.Salie@erm.com)>

**Sent:** Friday, August 23, 2024 3:32 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Please indicate which application your comment in respect of.

Thank you and regards,

**Sadiya Salie**  
Consultant



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Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town



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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Bcc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 13:09:03  
**Attachments:** [image001.png](#)  
[image005.png](#)

---

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 12:59 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Sadiya

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Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
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**Sent:** Friday, September 27, 2024 12:29 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Consultant

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Cape Town

[Redacted]

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**From:** [Redacted]

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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[Redacted]

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**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**Sent:** Wednesday, September 25, 2024 11:39 AM

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[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
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[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
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Good day

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[Notice](#)



**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

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Protea Assurance Building Greenmarket Square, Cape Town

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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

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Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**From:** [REDACTED]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED] ERM Hugo & Khoe Wind Energy Facilities

<HugoKhoe@erm.com>

Cc: [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

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**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,

**Sadiya Salie**  
Consultant

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ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report: Khoe Wind Energy Facility  
**Date:** Friday, 27 September 2024 13:43:18  
**Attachments:** [Khoe\\_WEF\\_Koo\\_Valley\\_20240927.pdf](#)

---

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality.

Regards

Rhett

**Rhett Smart**  
Land Use Scientist | South Landscape



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**reference** LS14/2/6/1/9/1/Khoe\_WEF\_Koo Valley  
**date** 27 September 2024

Environmental Resources Management Southern Africa  
1st Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
Cape Town,  
7700

Attention: Sadiya Salie  
By email: [hugokhoe@erm.com](mailto:hugokhoe@erm.com)

Dear Ms Salie

**Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality (DFFE ref. no.: 14/12/16/3/3/2/2516)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

**Terrestrial Biodiversity Impact Assessment and Botanical Impact Assessment**

The Western Cape Biodiversity Spatial Plan (BSP) should be the primary desktop informant for the terrestrial biodiversity impact assessment, of which the mapping is accurately reflected in Figure 3 of the terrestrial biodiversity impact assessment. Ecological Support Area 1 and 2 (ESA) covers a large percentage of the study area and the objectives as described in the BSP Guidelines are accurately reflected. The three vegetation types occurring in the study area as mapped in the National Vegetation Map are also included. The wind turbines are mostly located within the ESA on the site, however very few are located within the areas mapped as No Natural where natural habitat will not be impacted.

The methodology is described and references the protocols. While the desktop study is comprehensive and accurately reflected, the site verification is described as accompanying the faunal specialist to verify the screening tool results with two site visits in March and June. The protocol

requires “3.1.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment”. Neither of the site visits would have been within the optimal time of year in the winter rainfall region when species that are dormant the rest of the year would not be visible e.g. spring flowering annuals and geophytes. The Ecosystem Guidelines for Environmental Assessment state that for renosterveld “Undertake environmental assessments in spring (when the bulk of the annuals and bulbs are flowering), and in veld that is between 4 and 12 years old” (Helme & Rebelo 2016). The methodology of the fieldwork is not described in any further detail with regards to the areas which were assessed and whether any quantitative sampling was undertaken.

Seven vegetation surveys were conducted within the areas mapped as Matjiesfontein Shale Renosterveld and one within the North Langeberg Sandstone Fynbos and four habitats were identified namely Matjiesfontein Shale Renosterveld riparian habitat, Matjiesfontein Shale Renosterveld low shrubland, Matjiesfontein Shale Renosterveld drainage area and North Langeberg Sandstone Fynbos rocky outcrops. A few species are mentioned for each of these habitats and in this regard, we wish to query the vegetation classification. *Protea repens* is listed as a dominant species within the Matjiesfontein Shale Renosterveld low shrubland, however this species is a common species typical of fynbos. One of the key diagnostic features in separating fynbos and renosterveld is the absence of Proteaceae, Ericaceae and Restionaceae in the latter (Mucina & Rutherford 2006). This habitat is described occurring in the south west of the site, however this is where North Langeberg Sandstone Fynbos and South Langeberg Sandstone Fynbos are mapped. The dominant species occurring within North Langeberg Sandstone Fynbos rocky outcrops are listed as renosterbos (*Dicerotheramnus rhinocerotis*) and *Oedera genistifolia* which are typical of renosterveld. Therefore, clarification is required regarding the location of the 7 surveys and the accurate mapping of the vegetation types.

The protocols state that “the assessment must be based on the results of a site inspection undertaken on the preferred site and must identify: 2.3.7.2. terrestrial ecological support areas (ESAs), including: (a) the impact on the ecological processes that operate within or across the site; (b) the extent the proposed development will impact on the functionality of the ESA; and (c) loss of ecological connectivity (on site, and in relation to the broader landscape) due to the degradation and severing of ecological corridors or introducing barriers that impede migration and movement of flora and fauna;”

The above mapping of habitats must therefore be reconciled with the BSP mapping of the site, in particular the ESAs which are extensive. The extent of Critical Biodiversity Areas (CBAs) on site is negligible, but should nevertheless be avoided.

The site ecological importance (SEI) has been calculated for the three vegetation types mapped for the site and for terrestrial-aquatic ecotones. We wish to note that the SEI as described in the Species Environmental Assessment Guidelines is for the plant species and animal species themes. A draft Ecosystem Environmental Assessment Guideline has been developed but has not been approved for implementation. The SEI has however been used to inform the sensitivity map for the study area. With regards to the SEI calculations, we wish to query the rating of high receptor resilience for renosterveld, as renosterveld is known to have a low restoration potential if disturbed (Krug 2004). We further wish to query why the biodiversity importance for South Langeberg Sandstone Fynbos is medium while the other three are high. The SEI results are high for terrestrial-aquatic ecotones,

medium for Matjiesfontein Shale Renosterveld and North Langeberg Sandstone Fynbos and low for South Langeberg Sandstone Fynbos.

The SEI Map (Figure 5) does not correlate with the mapping of the above four ecosystems which were assessed. The high sensitivity areas are recommended as a no-go with the motivation provided of the presence of a highly sensitive floral species. The sensitivity map for the terrestrial biodiversity impact assessment is therefore actually the sensitivity map for the plant species theme. The sensitivity map reflecting the habitats identified and associated sensitivities should therefore be provided as the sensitivity map for the terrestrial biodiversity theme.

The protocols state that “2.3.6. the assessment must identify any alternative development footprints within the preferred site which would be of a low sensitivity as identified by the screening tool and verified through the site sensitivity verification.” We note that only 6 of the 29 turbines are located within the low sensitivity areas of Figure 5.2.2., however it is acknowledged that sensitivities identified in other studies also need to be considered. The protocol states that “2.2. the assessment must be undertaken on the preferred site and within the proposed development footprint”, therefore it is interpreted that the footprints of the turbines need to be ground-truthed.

Five potential impacts are identified and are rated as medium prior to mitigation and low after mitigation, apart from mortality due to collisions which is rated as high prior to mitigation. We wish to note that some of the impacts assessed are best addressed in other specialist studies undertaken such as chemical contamination and the collision risk which is assessed in the avifaunal and bat impact assessments.

In general, the terrestrial biodiversity impact assessment is significantly flawed as described above. The habitats present on site are not accurately described and mapped in order to reconcile with the desktop information. The land cover mapping indicates the land uses which have resulted in transformation and disturbance to the natural habitats that would have been present. There is however no map provided indicating the habitats identified on site and the transformed areas which should be used to inform the sensitivity of the site and the development layout (refer to comments regarding Figure 5). We therefore recommend that a peer review is undertaken of the terrestrial biodiversity impact assessment to ensure that the habitats and associated sensitivities are accurately identified and mapped.

The Botanical Impact Assessment addresses the plant species theme which relates to the potential impact on plant species of conservation concern (SCCs). The methodology for the botanical impact assessment is a duplication of the terrestrial biodiversity assessment and includes the above description of habitats present. The Botanical Scoping Report indicated that belt transects would be undertaken in the EIA Phase however it is not evident that this has been undertaken. The protocols state that the Terrestrial Plant Species Specialist Assessment must be undertaken in accordance with the Species Environmental Assessment Guideline (SANBI 2020).



The list of the plant SCCs listed in the screening tool is presented however there is no indication whether any of these species occur on site or the likelihood of their occurrence or whether an attempt was made to locate any of these species. The protocol states that “2.3.1 Identify the SCC which were found, observed or are likely to occur within the study area”. 2.3.2 – 2.3.12 follow-on from the SCCs which are identified in the site assessment or are considered to be likely to occur on the site. Similarly to the terrestrial biodiversity assessment, the footprints of the turbines should be ground-truthed. Section 10.1 of the Species Environmental Assessment Guideline provides guidelines for undertaking a plant species assessment, including the recommended fieldwork methodology.

The calculation of the SEI and the SEI map in the botanical impact assessment is a duplication of the terrestrial biodiversity assessment. The SEI is however relevant to the botanical impact assessment as it is undertaken in terms of the Species Environmental Assessment Guideline. The SEI should however reference the plant SCCs as opposed to the habitat types occurring in the study area, although the SCCs occurring in the same habitat can be grouped. The SEI map is more relevant to the botanical impact assessment as previously mentioned. The map appears to be based on the screening tool map and the high sensitivity attributed to two species, one of which cannot be named in a public report and is listed as sensitive species 207. The impact assessment is a duplication of the terrestrial biodiversity assessment.

In general, the botanical impact assessment is highly flawed similarly to the terrestrial biodiversity assessment and does not comply with the protocols and Species Environmental Assessment Guideline. We therefore recommend that the botanical impact assessment should also be subject to a peer review. The impacts on terrestrial biodiversity and plant SCCs may not be above unacceptable thresholds, however there is currently insufficient information to assess the impacts and proposed layout, more specifically ground-truthed information. The outcomes and recommendations are based on the desktop information.

## **Animal Species Impact Assessment**

The animal species impact assessment has been updated to include an assessment of impacts and has included an evaluation of *Aloeides caledoni* (Caledon copper) which was queried in the Scoping Phase. The latter species is considered unlikely to occur within the development footprint and the motivation is supported. CapeNature recommended that additional fieldwork is required in our comments in the Scoping Phase, which included camera traps at additional locations and supplementary methodologies. However, no additional fieldwork has been undertaken and the impact assessment report is based on the information presented in the Scoping Phase report. We will not repeat our previous comments which remain relevant and included the reference to only two camera trap localities which are not fully representative of the habitats over the large study area. Drive transects were proposed for the EIA Phase however it is not apparent that this was undertaken. We recommend that the additional fieldwork as included in our comments in the Scoping Phase should be undertaken prior to commencement of construction. We wish to note that the comments and response report has mixed up the responses regarding the adjacent proposed Hugo Wind Energy Facility where there were confirmed sightings of riverine rabbit (*Bunolagus monticularis*).

Data regarding the records of species other than the three targeted SCCs have been provided as requested. A total number of 66 species were recorded, with the most frequently recorded species apart from livestock and birds consisting of hares (*Lepus sp.*), black-backed jackal (*Canis mesomelas*) and African wild cat (*Felis lybica*). Confirmation must be provided that no other SCCs were recorded on the camera traps.

The comments and response report indicates that the Endangered Wildlife Trust (EWT) will be consulted in the EIA Phase regarding riverine rabbits and incorporating appropriate mitigation and conservation measures as part of the project proposal. Mitigation measures could include stewardship and habitat restoration. Further detail is provided regarding the species including studies which confirm that the species utilizes previously degraded areas which have been restored.

The SEI was calculated for the three SCCs during the Scoping Phase with medium sensitivity for riverine rabbit and low sensitivity for leopard and grey rhebuck. The mapping from the screening tool for the riverine rabbit was used to inform the sensitivity map. The SEI is not however included in the EIA Phase report. The SEI should be used to inform the sensitivity map for the EIA phase and should be based on the mapping of suitable habitat for the SCCs. Riverine rabbits have fairly specific habitat requirements associated with watercourses and suitable habitat should be mapped. The sensitivity map presented in Figure 6 is based on habitat condition, with the natural and near-natural habitat mapped as medium sensitivity and the agricultural fields as low sensitivity. There is a similarity with the sensitivity map for the terrestrial biodiversity and botanical impact assessments but not a full match. Additional explanation is required regarding the sensitivity map in relation to the SEI for the three SCCs and the habitats utilized by these species.

Several impacts have been identified throughout the life cycle of the WEF related to habitat loss, disturbance and mortality, with the impact significance prior to mitigation for all rated medium, and after mitigation either reduced to low or changed to medium positive. The medium positive impact relates to the proposal for habitat restoration within the study area. None of the impacts have a residual impact of medium or higher and therefore do not trigger the requirement for a biodiversity offset. Although riverine rabbits were not confirmed to be present on the site, the confirmed presence on nearby properties could motivate for the protection of suitable habitat for this species within the study area in collaboration with EWT.

The mitigation measures proposed mainly relate to changes to the land practices on the affected properties and therefore requires that buy-in from a third party for the mitigation to be implemented. The impact ratings of a positive impact make several assumptions which would include landowner buy-in and extensive habitat restoration and reduction in agricultural activity. Confirmation of the landowner willingness would be required prior to submission of the Final EIA Report in order for this mitigation to be accepted. EWT could play an important role in this regard. We further note the areas proposed for restoration in the sensitivity map and wish to query the selection of these areas. It would be assumed that the areas which would be targeted for riverine rabbit would be the watercourses with an increase in the existing buffer for agricultural activities. We further wish to note that while the proposed mitigation is fully supported from a biodiversity perspective, it may be in

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Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

conflict with recommendations from other sectors such as agriculture and may require further negotiation.

It is recommended that post-construction monitoring is implemented for a period of at least two years and included in the Environmental Management Programme Report. This should include as a minimum:

- Monitoring of riverine rabbit habitat condition, e.g. monitoring impacts of construction and operation, and the reduction in livestock and/or game stocking rates, on soil and vegetation.
- Monitoring to establish changes in presence, reproduction, recruitment and activity patterns of SCC, especially riverine rabbit, due to development-related disturbance.
- Monitoring the impacts of linear infrastructure, such as roadkill and erosion due to increased road traffic. Should a roadkill of a SCC occur, the circumstances must be investigated, and steps taken to prevent a reoccurrence. Riverine rabbit carcasses must be made available for genetic research.

The following additional mitigation measures are recommended:

- A reduction in the stocking rate of game and livestock will facilitate habitat recovery and habitat restoration projects. The recommended ecological stocking rates for both properties must be determined by an expert and formally agreed to by the relevant landowner(s) prior to the onset of development. This may require compensation for loss of income.
- Relocation of any fauna in the construction area must be done by a suitably qualified person, e.g. trained snake handler.
- Construction activity should not only be minimized from dusk and dawn, but also during the hour after dawn and hour before dusk. In winter especially, this is a period when many animals (including riverine rabbit) are still active.
- Minimization of lighting used to illuminate construction areas and site buildings. – recommend exploring the use of UV lights.
- The development footprint should avoid No-Go/ High Sensitivity areas completely, not “as much as possible”.

## **Avifaunal Impact Assessment**

An avifaunal impact assessment was included within the Scoping Phase. The Scoping Phase impact assessment has been updated with the current preferred layout with two less turbines than previously. The revised layout was factored into the collision risk model with the result of slightly lower risks for the species assessed.

CapeNature had queried the implementation of the buffers from nests for Black Harriers and Verreaux’s Eagles in accordance with the species-specific monitoring guidelines. There were turbines located within the recommended 3.7 km buffer from a Verreaux’s Eagle nest, however it was recommended to rather use the modelled flights of the collision risk model than the generic radius around the nest as this is considered as a more accurate reflection of the flight paths. The motivation is accepted.

The collision risk model is only being used for the second time for this facility and the adjacent Hugo WEF. Use of collision risk modelling could potentially be a significant step forward in designing WEFs to minimize the impact of bird collisions due to a higher confidence in the prediction in collision risk. Post-construction monitoring is therefore essential in assessing the accuracy of the predictions and hence future adoption of the model within the industry.

The impact assessment rates the impact of displacement as medium both before and after mitigation and the impact of collisions as medium-high prior to mitigation and medium after mitigation. The residual impact is within the threshold which requires a biodiversity offset according to the National Biodiversity Offset Guidelines i.e. medium or higher. All proposed mitigation measures are supported and must be implemented. The recommendation with regards to the residual impacts is that the post-construction monitoring will be able to determine the actual impacts and allow the opportunity to evaluate if additional mitigation measures, which could take the form of a species offset. We wish to note that a pilot species offset is currently being investigated for impacts from a WEF on a bird species and can be used as a precedent if required. We therefore recommend that after two years of post-construction monitoring, an evaluation is undertaken whether a species offset or other additional mitigation is required, with the option of extending the evaluation period by another two years. We recommend that this should be included as a condition of approval.

## **Bat Impact Assessment**

The bat scoping study presented the preliminary results from the bat monitoring and indicated that recommendations would be provided once at least a full of monitoring is complete. The monitoring results are from December 2022 – March 2024. In general, bat activity is considered to be high on site with five species recorded and one species accounting for more than half of the records (*Laephotis capensis* – Cape roof bat).

Four masts scattered throughout the study area were used for the monitoring with the microphones at 10 m and also at 50 m and 100m for the one mast. A sensitivity map was developed and used as an informant to the development layout. The sensitivity is based on the buffer zones in the bat monitoring guidelines. The buffers are placed around features which are likely to support bat habitat e.g. water bodies, dwellings. No turbines are located within the areas mapped as medium-high or high sensitivity. The remainder of the site is medium sensitivity.

A number of impacts are identified, most of which are of medium significance before mitigation and low significance after mitigation. The exceptions are the impact of barotrauma and collision mortality which is rated high significance both before and after mitigation and the impact of the loss of foraging space which is rated high significance before mitigation and medium significance after mitigation. The residual impact for both of these impacts exceeds the threshold for biodiversity offsets. The overall impact on bats is however rated as medium before mitigation and low after mitigation.

A number of mitigation measures are proposed all of which are supported and must be implemented. Note that roof sealing should include the installation of one-way valves to allow an escape route for

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any bats trapped inside buildings. Mention is made of the potential use of bat deterrents, although their efficacy in South Africa is unknown. A recommendation could be to experimentally trial a deterrent on one or both sites. The description of the residual impacts per impact appears to address the residual impact after the VEF is decommissioned and therefore does not refer to the residual impact after following the mitigation hierarchy. Our recommendation is therefore that post-construction monitoring must be undertaken, and the impacts should be reviewed after a two year period to assess whether offsets of other additional mitigation measures are required, as was recommended for the avifaunal impact assessment.

## **Aquatic Impact Assessment**

An aquatic impact assessment was compiled for the Scoping Phase. The contents were broadly supported, and no major concerns were identified. The assessment recommended buffer zones for each of the aquatic features which were calculated using the buffer zone tool and can be considered relatively conservative. The buffer zones were used to inform the layout. The aquatic impact assessment has been updated for the EIA Phase with only minimal changes and therefore our previous comments remain relevant. Several impacts were identified all of which are rated as medium significance prior to mitigation and low significance after mitigation. The addendum assesses the current proposed layout with no changes to the assessment.

We wish to query why the delineation of the aquatic features and associated buffer zones were not used in the animal species impact assessment in determining the suitable habitat for riverine rabbits and hence the animal species sensitivity map.

## **Development Layout**

The informants to the development layout were queried during the Scoping Phase. An appendix has been provided indicating the iterations in the development of the current proposed layout and the informants which were used. The current preferred layout is the third iteration, with the description indicating the first revision is based on technical considerations, the second iteration included the bird, bat, aquatic biodiversity and terrestrial biodiversity no-go areas and the final iteration addressed the high visual impact sensitivities. It would however appear that the first iteration took into consideration sensitivities as a large proportion of the central/eastern part of the study area is devoid of turbines (possibly agricultural potential and/or bird and bat monitoring). We wish to query the terrestrial biodiversity constraints that were used as the only high sensitivity area identified is based on the modelled distribution of a plant species in the screening tool which needs to be ground-truthed.

While the description of the iterations used in the development of the layout provides clarity in terms of the investigation of alternatives and selection of the best practicable alternative from an environmental perspective, further confirmation is required that the preferred alternative has taken into account all the variables. We therefore recommend that a comparative table is provided for each of the specialist studies undertaken evaluating the proposed layout in relation to the identified sensitivities (and taking into account concerns raised about sensitivity mapping). In this regard we wish to note that recommendations can be grouped into preferred, not preferred but acceptable and not acceptable/no-go e.g. from a terrestrial biodiversity perspective, location on the cultivated lands may

be preferred, however location within least concern indigenous vegetation mapped as ESA and micro-sited on to a disturbance footprint may not be preferred but is acceptable.

## Conclusion

In conclusion, CapeNature recommends that the following concerns must be addressed prior to submission of the Final EIA Report:

- The terrestrial biodiversity impact assessment and plant species impact assessment should be subjected to a peer review to ensure that accurate ground-truthed descriptions and mapping of the habitats and SCCs present and associated sensitivity is provided. The footprints of the turbines and associated infrastructure should be ground-truthed.
- Additional pre-construction monitoring is required for the animal species impact assessment in order to provide more accurate data to inform the assessment.
- Post-construction monitoring must take place for the mammal SCCs, avifauna and bats according to the required/appropriate methodology. A re-evaluation of the residual impacts must be undertaken after two years of post-construction monitoring and a determination made whether biodiversity offsets or other additional mitigation measures are required. Provision should be made for a further extension of post-construction monitoring.
- Once the sensitivity mapping for the terrestrial biodiversity, plant species and animal species has been amended in accordance with the comments above, a matrix with inputs from all specialist studies should be provided confirming that the current preferred layout is the overall preferred layout or whether further amendments to the layout are required.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Marianne de Villiers, CapeNature

Adri Le Meyer, Department of Environmental Affairs and Development Planning

### References:

Helme, N. & Rebelo, T. 2016. Chapter 5: Ecosystem Guidelines, Renosterveld Ecosystems incorporating Coast and Inland Renosterveld. In: Cadman M., editor. *Ecosystem Guidelines for Environmental Assessment in the Western Cape*. 2nd Edition. Fynbos Forum, Cape Town.

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South African National Biodiversity Institute (SANBI). 2020. *Species Environmental Assessment Guideline. Guidelines for the Implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for Environmental Impact Assessments in South Africa*. South African National Biodiversity Institute, Pretoria. Version 3.1. 2022.

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Draft EIA Report: Khoe Wind Energy Facility  
**Date:** Friday, 27 September 2024 13:58:06  
**Attachments:** [image003.png](#)

---

Hi Rhett,

Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 1:43 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report: Khoe Wind Energy Facility

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality.

Regards

Rhett

**Rhett Smart**  
Land Use Scientist | South Landscape



[REDACTED] | postal 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200



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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
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---

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**ERM**

**Sadiya Salie**  
Consultant

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**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
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**Subject:** Draft EIA Report: Khoe Wind Energy Facility

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality.

Regards

Rhett

**Rhett Smart**  
Land Use Scientist | South Landscape



[REDACTED] | postal 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200

**physical** 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200  
[www.capenature.co.za](http://www.capenature.co.za)

---

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 14:37:50  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[S38\(8\) IC Sep 2024 Hugo 23102514.pdf](#)  
[S38\(8\) IC Sep 2024 Khoe 23110807.pdf](#)

**EXTERNAL MESSAGE**

Dear ERM colleagues,

As indicated by HWC, their comments on the Hugo WEF are interim comments. There is always the opportunity to release revised reports, but it appears that this suggestion is not a viable one for you or the applicant. You are advised that submitting the Final EIAR without HWC's final comment on the Hugo WEF, you may prejudice the success of the application/s.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, September 27, 2024 13:09  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

---

**From:** [Redacted]  
**Sent:** Friday, September 27, 2024 12:59 PM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [Redacted] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC. These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

**[HWC Committee Schedule 2024](#)**

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Friday, September 27, 2024 12:29 PM  
**To:** [Redacted]  
[Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]

[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
Western Cape Province

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Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,  
Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards

---

**Sadiya Salie**  
Consultant



# ERM

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



---

**From:** [Redacted]  
**Sent:** Wednesday, September 25, 2024 12:10 PM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Wednesday, September 25, 2024 11:47 AM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

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Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, August 27, 2024 2:23 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

Kind regards,

**Application forms 2024:**  
[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Monday, August 26, 2024 11:25 AM  
**To:** [REDACTED]

[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**

Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

Please include your HWC reference number in future correspondence to assist in responding to your query promptly.

Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

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If you are not the intended recipient you may not copy or deliver this message to anyone."

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If you are not the intended recipient you may not copy or deliver this message to anyone."

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23102514SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: INTERIM COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED HUGE WEF ON REMAINDER OF FARM 145 (OU DE KRAAL), REMAINDER OF FARM 147 (STINKFONTEINS BERG), REMAINDER OF FARM 172 (STINKFONTEIN), FARM 173 (DRIEHOEK), REMAINDER OF FARM 174 (PRESENTS KRAAL) AND PORTION 9 OF FARM 148 (HELPMEKAARR), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

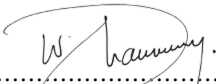
**INTERIM COMMENT:**

The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA but requires clarity on the degree to which the visual issues raised within the Visual Impact Assessment have been address within the final preferred layout option. Comparative map showing the preferred final layout and the extent to which visual concerns have been addressed must be included within the revised to be submitted to HWC form final comment.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

**Straatadres:** Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Posbus 1665, Kaapstad, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

**Our Ref:** HM/CAPE WINELANDS/ BREEDE VALLEY & LANGEBERG /  
TOUWSRIVER & MONTAGUE/ VARIOUS FARMS  
**Case No:** HWC23110807SB1124  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



Consultant: John Gribble  
[john.gribble@terramarearchaeology.com](mailto:john.gribble@terramarearchaeology.com)

**RESPONSE TO HERITAGE IMPACT ASSESSMENT: FINAL COMMENT**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PROPOSED KHOE WEF ON PORTIONS 1, 2 AND 11 OF FARM 38 (EENDRAGT), FARM 193 AND REMAINDER OF FARM 37 (EENDRAGT), SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.  
This matter was discussed at the Impact Assessment Committee (IACom) held on 16 September 2024

**FINAL COMMENT:**

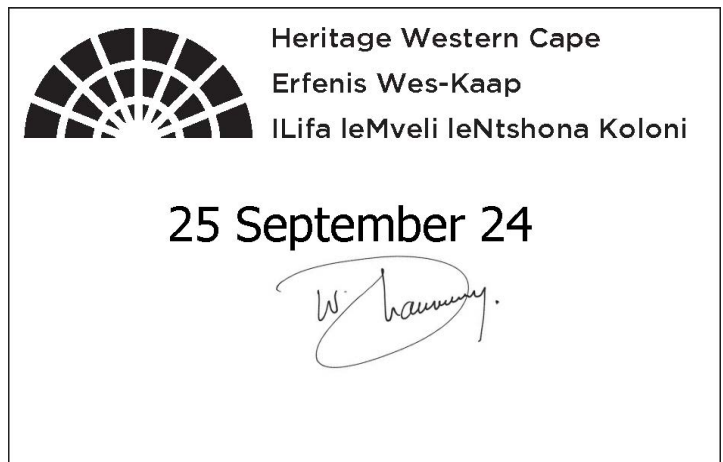
The Committee endorse the HIA as meeting the requirements of S38(3) of the NHRA, but does not support the proposed activity, given the anticipated impact of the activity upon the Cultural landscape.

The Committee requests the submission of a consolidated plan showing the proposed development within the context of approved developments adjacent to the site (to illustrate the proposal in context).

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

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• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#); [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 14:58:08  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[Khoe\\_WEF\\_Koo Valley\\_20240927.pdf](#)

**EXTERNAL MESSAGE**

Hi all,  
Further to my email earlier, comments from CapeNature on the Khoe WEF EIA also suggests that a Revised EIA be released for I&AP consultation. Should you submit the Final EIA on 30/09/2024 and the DFFE grant an EA, you have a risk of several appeals being lodged against the EA.

Kind regards,  
Adri

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 14:32  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear ERM colleagues,  
As indicated by HWC, their comments on the Hugo WEF are interim comments. There is always the opportunity to release revised reports, but it appears that this suggestion is not a viable one for you or the applicant. You are advised that submitting the Final EIA without HWC's final comment on the Hugo WEF, you may prejudice the success of the application/s.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Friday, September 27, 2024 13:09  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]



[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 12:59 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC. These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

HWC Committee Schedule 2024

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com). [Learn why this is important](#)

Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]

Cc: [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services

Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:47 AM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

**From:** [Redacted]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services

Protea Assurance Building Greenmarket Square, Cape Town

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---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** [Redacted]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

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**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query**

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport  
Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)  
Heritage Western CapeTel: (+27) 021 829 3315**

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**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town





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**postal** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**physical** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
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**telephone** 087 087 8017  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** LS14/2/6/1/9/1/Khoe\_WEF\_Koo Valley  
**date** **27 September 2024**

Environmental Resources Management Southern Africa  
1st Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
Cape Town,  
7700

Attention: Sadiya Salie  
By email: [hugokhoe@erm.com](mailto:hugokhoe@erm.com)

Dear Ms Salie

**Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality (DFFE ref. no.: 14/12/16/3/3/2/2516)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

**Terrestrial Biodiversity Impact Assessment and Botanical Impact Assessment**

The Western Cape Biodiversity Spatial Plan (BSP) should be the primary desktop informant for the terrestrial biodiversity impact assessment, of which the mapping is accurately reflected in Figure 3 of the terrestrial biodiversity impact assessment. Ecological Support Area 1 and 2 (ESA) covers a large percentage of the study area and the objectives as described in the BSP Guidelines are accurately reflected. The three vegetation types occurring in the study area as mapped in the National Vegetation Map are also included. The wind turbines are mostly located within the ESA on the site, however very few are located within the areas mapped as No Natural where natural habitat will not be impacted.

The methodology is described and references the protocols. While the desktop study is comprehensive and accurately reflected, the site verification is described as accompanying the faunal specialist to verify the screening tool results with two site visits in March and June. The protocol

requires “3.1.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment”. Neither of the site visits would have been within the optimal time of year in the winter rainfall region when species that are dormant the rest of the year would not be visible e.g. spring flowering annuals and geophytes. The Ecosystem Guidelines for Environmental Assessment state that for renosterveld “Undertake environmental assessments in spring (when the bulk of the annuals and bulbs are flowering), and in veld that is between 4 and 12 years old” (Helme & Rebelo 2016). The methodology of the fieldwork is not described in any further detail with regards to the areas which were assessed and whether any quantitative sampling was undertaken.

Seven vegetation surveys were conducted within the areas mapped as Matjiesfontein Shale Renosterveld and one within the North Langeberg Sandstone Fynbos and four habitats were identified namely Matjiesfontein Shale Renosterveld riparian habitat, Matjiesfontein Shale Renosterveld low shrubland, Matjiesfontein Shale Renosterveld drainage area and North Langeberg Sandstone Fynbos rocky outcrops. A few species are mentioned for each of these habitats and in this regard, we wish to query the vegetation classification. *Protea repens* is listed as a dominant species within the Matjiesfontein Shale Renosterveld low shrubland, however this species is a common species typical of fynbos. One of the key diagnostic features in separating fynbos and renosterveld is the absence of Proteaceae, Ericaceae and Restionaceae in the latter (Mucina & Rutherford 2006). This habitat is described occurring in the south west of the site, however this is where North Langeberg Sandstone Fynbos and South Langeberg Sandstone Fynbos are mapped. The dominant species occurring within North Langeberg Sandstone Fynbos rocky outcrops are listed as renosterbos (*Dicrothamnus rhinocerotis*) and *Oedera genistifolia* which are typical of renosterveld. Therefore, clarification is required regarding the location of the 7 surveys and the accurate mapping of the vegetation types.

The protocols state that “the assessment must be based on the results of a site inspection undertaken on the preferred site and must identify: 2.3.7.2. terrestrial ecological support areas (ESAs), including: (a) the impact on the ecological processes that operate within or across the site; (b) the extent the proposed development will impact on the functionality of the ESA; and (c) loss of ecological connectivity (on site, and in relation to the broader landscape) due to the degradation and severing of ecological corridors or introducing barriers that impede migration and movement of flora and fauna;”

The above mapping of habitats must therefore be reconciled with the BSP mapping of the site, in particular the ESAs which are extensive. The extent of Critical Biodiversity Areas (CBAs) on site is negligible, but should nevertheless be avoided.

The site ecological importance (SEI) has been calculated for the three vegetation types mapped for the site and for terrestrial-aquatic ecotones. We wish to note that the SEI as described in the Species Environmental Assessment Guidelines is for the plant species and animal species themes. A draft Ecosystem Environmental Assessment Guideline has been developed but has not been approved for implementation. The SEI has however been used to inform the sensitivity map for the study area. With regards to the SEI calculations, we wish to query the rating of high receptor resilience for renosterveld, as renosterveld is known to have a low restoration potential if disturbed (Krug 2004). We further wish to query why the biodiversity importance for South Langeberg Sandstone Fynbos is medium while the other three are high. The SEI results are high for terrestrial-aquatic ecotones,

medium for Matjiesfontein Shale Renosterveld and North Langeberg Sandstone Fynbos and low for South Langeberg Sandstone Fynbos.

The SEI Map (Figure 5) does not correlate with the mapping of the above four ecosystems which were assessed. The high sensitivity areas are recommended as a no-go with the motivation provided of the presence of a highly sensitive floral species. The sensitivity map for the terrestrial biodiversity impact assessment is therefore actually the sensitivity map for the plant species theme. The sensitivity map reflecting the habitats identified and associated sensitivities should therefore be provided as the sensitivity map for the terrestrial biodiversity theme.

The protocols state that “2.3.6. the assessment must identify any alternative development footprints within the preferred site which would be of a low sensitivity as identified by the screening tool and verified through the site sensitivity verification.” We note that only 6 of the 29 turbines are located within the low sensitivity areas of Figure 5. 2.2., however it is acknowledged that sensitivities identified in other studies also need to be considered. The protocol states that “2.2. the assessment must be undertaken on the preferred site and within the proposed development footprint”, therefore it is interpreted that the footprints of the turbines need to be ground-truthed.

Five potential impacts are identified and are rated as medium prior to mitigation and low after mitigation, apart from mortality due to collisions which is rated as high prior to mitigation. We wish to note that some of the impacts assessed are best addressed in other specialist studies undertaken such as chemical contamination and the collision risk which is assessed in the avifaunal and bat impact assessments.

In general, the terrestrial biodiversity impact assessment is significantly flawed as described above. The habitats present on site are not accurately described and mapped in order to reconcile with the desktop information. The land cover mapping indicates the land uses which have resulted in transformation and disturbance to the natural habitats that would have been present. There is however no map provided indicating the habitats identified on site and the transformed areas which should be used to inform the sensitivity of the site and the development layout (refer to comments regarding Figure 5). We therefore recommend that a peer review is undertaken of the terrestrial biodiversity impact assessment to ensure that the habitats and associated sensitivities are accurately identified and mapped.

The Botanical Impact Assessment addresses the plant species theme which relates to the potential impact on plant species of conservation concern (SCCs). The methodology for the botanical impact assessment is a duplication of the terrestrial biodiversity assessment and includes the above description of habitats present. The Botanical Scoping Report indicated that belt transects would be undertaken in the EIA Phase however it is not evident that this has been undertaken. The protocols state that the Terrestrial Plant Species Specialist Assessment must be undertaken in accordance with the Species Environmental Assessment Guideline (SANBI 2020).

The list of the plant SCCs listed in the screening tool is presented however there is no indication whether any of these species occur on site or the likelihood of their occurrence or whether an attempt was made to locate any of these species. The protocol states that “2.3.1 Identify the SCC which were found, observed or are likely to occur within the study area”. 2.3.2 – 2.3.12 follow-on from the SCCs which are identified in the site assessment or are considered to be likely to occur on the site. Similarly to the terrestrial biodiversity assessment, the footprints of the turbines should be ground-truthed. Section 10.1 of the Species Environmental Assessment Guideline provides guidelines for undertaking a plant species assessment, including the recommended fieldwork methodology.

The calculation of the SEI and the SEI map in the botanical impact assessment is a duplication of the terrestrial biodiversity assessment. The SEI is however relevant to the botanical impact assessment as it is undertaken in terms of the Species Environmental Assessment Guideline. The SEI should however reference the plant SCCs as opposed to the habitat types occurring in the study area, although the SCCs occurring in the same habitat can be grouped. The SEI map is more relevant to the botanical impact assessment as previously mentioned. The map appears to be based on the screening tool map and the high sensitivity attributed to two species, one of which cannot be named in a public report and is listed as sensitive species 207. The impact assessment is a duplication of the terrestrial biodiversity assessment.

In general, the botanical impact assessment is highly flawed similarly to the terrestrial biodiversity assessment and does not comply with the protocols and Species Environmental Assessment Guideline. We therefore recommend that the botanical impact assessment should also be subject to a peer review. The impacts on terrestrial biodiversity and plant SCCs may not be above unacceptable thresholds, however there is currently insufficient information to assess the impacts and proposed layout, more specifically ground-truthed information. The outcomes and recommendations are based on the desktop information.

## **Animal Species Impact Assessment**

The animal species impact assessment has been updated to include an assessment of impacts and has included an evaluation of *Aloeides caledoni* (Caledon copper) which was queried in the Scoping Phase. The latter species is considered unlikely to occur within the development footprint and the motivation is supported. CapeNature recommended that additional fieldwork is required in our comments in the Scoping Phase, which included camera traps at additional locations and supplementary methodologies. However, no additional fieldwork has been undertaken and the impact assessment report is based on the information presented in the Scoping Phase report. We will not repeat our previous comments which remain relevant and included the reference to only two camera trap localities which are not fully representative of the habitats over the large study area. Drive transects were proposed for the EIA Phase however it is not apparent that this was undertaken. We recommend that the additional fieldwork as included in our comments in the Scoping Phase should be undertaken prior to commencement of construction. We wish to note that the comments and response report has mixed up the responses regarding the adjacent proposed Hugo Wind Energy Facility where there were confirmed sightings of riverine rabbit (*Bunolagus monticularis*).

Data regarding the records of species other than the three targeted SCCs have been provided as requested. A total number of 66 species were recorded, with the most frequently recorded species apart from livestock and birds consisting of hares (*Lepus sp.*), black-backed jackal (*Canis mesomelas*) and African wild cat (*Felis lybica*). Confirmation must be provided that no other SCCs were recorded on the camera traps.

The comments and response report indicates that the Endangered Wildlife Trust (EWT) will be consulted in the EIA Phase regarding riverine rabbits and incorporating appropriate mitigation and conservation measures as part of the project proposal. Mitigation measures could include stewardship and habitat restoration. Further detail is provided regarding the species including studies which confirm that the species utilizes previously degraded areas which have been restored.

The SEI was calculated for the three SCCs during the Scoping Phase with medium sensitivity for riverine rabbit and low sensitivity for leopard and grey rhebuck. The mapping from the screening tool for the riverine rabbit was used to inform the sensitivity map. The SEI is not however included in the EIA Phase report. The SEI should be used to inform the sensitivity map for the EIA phase and should be based on the mapping of suitable habitat for the SCCs. Riverine rabbits have fairly specific habitat requirements associated with watercourses and suitable habitat should be mapped. The sensitivity map presented in Figure 6 is based on habitat condition, with the natural and near-natural habitat mapped as medium sensitivity and the agricultural fields as low sensitivity. There is a similarity with the sensitivity map for the terrestrial biodiversity and botanical impact assessments but not a full match. Additional explanation is required regarding the sensitivity map in relation to the SEI for the three SCCs and the habitats utilized by these species.

Several impacts have been identified throughout the life cycle of the WEF related to habitat loss, disturbance and mortality, with the impact significance prior to mitigation for all rated medium, and after mitigation either reduced to low or changed to medium positive. The medium positive impact relates to the proposal for habitat restoration within the study area. None of the impacts have a residual impact of medium or higher and therefore do not trigger the requirement for a biodiversity offset. Although riverine rabbits were not confirmed to be present on the site, the confirmed presence on nearby properties could motivate for the protection of suitable habitat for this species within the study area in collaboration with EWT.

The mitigation measures proposed mainly relate to changes to the land practices on the affected properties and therefore requires that buy-in from a third party for the mitigation to be implemented. The impact ratings of a positive impact make several assumptions which would include landowner buy-in and extensive habitat restoration and reduction in agricultural activity. Confirmation of the landowner willingness would be required prior to submission of the Final EIA Report in order for this mitigation to be accepted. EWT could play an important role in this regard. We further note the areas proposed for restoration in the sensitivity map and wish to query the selection of these areas. It would be assumed that the areas which would be targeted for riverine rabbit would be the watercourses with an increase in the existing buffer for agricultural activities. We further wish to note that while the proposed mitigation is fully supported from a biodiversity perspective, it may be in

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Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

conflict with recommendations from other sectors such as agriculture and may require further negotiation.

It is recommended that post-construction monitoring is implemented for a period of at least two years and included in the Environmental Management Programme Report. This should include as a minimum:

- Monitoring of riverine rabbit habitat condition, e.g. monitoring impacts of construction and operation, and the reduction in livestock and/or game stocking rates, on soil and vegetation.
- Monitoring to establish changes in presence, reproduction, recruitment and activity patterns of SCC, especially riverine rabbit, due to development-related disturbance.
- Monitoring the impacts of linear infrastructure, such as roadkill and erosion due to increased road traffic. Should a roadkill of a SCC occur, the circumstances must be investigated, and steps taken to prevent a reoccurrence. Riverine rabbit carcasses must be made available for genetic research.

The following additional mitigation measures are recommended:

- A reduction in the stocking rate of game and livestock will facilitate habitat recovery and habitat restoration projects. The recommended ecological stocking rates for both properties must be determined by an expert and formally agreed to by the relevant landowner(s) prior to the onset of development. This may require compensation for loss of income.
- Relocation of any fauna in the construction area must be done by a suitably qualified person, e.g. trained snake handler.
- Construction activity should not only be minimized from dusk and dawn, but also during the hour after dawn and hour before dusk. In winter especially, this is a period when many animals (including riverine rabbit) are still active.
- Minimization of lighting used to illuminate construction areas and site buildings. – recommend exploring the use of UV lights.
- The development footprint should avoid No-Go/ High Sensitivity areas completely, not “as much as possible”.

## **Avifaunal Impact Assessment**

An avifaunal impact assessment was included within the Scoping Phase. The Scoping Phase impact assessment has been updated with the current preferred layout with two less turbines than previously. The revised layout was factored into the collision risk model with the result of slightly lower risks for the species assessed.

CapeNature had queried the implementation of the buffers from nests for Black Harriers and Verreaux’s Eagles in accordance with the species-specific monitoring guidelines. There were turbines located within the recommended 3.7 km buffer from a Verreaux’s Eagle nest, however it was recommended to rather use the modelled flights of the collision risk model than the generic radius around the nest as this is considered as a more accurate reflection of the flight paths. The motivation is accepted.

The collision risk model is only being used for the second time for this facility and the adjacent Hugo WEF. Use of collision risk modelling could potentially be a significant step forward in designing WEFs to minimize the impact of bird collisions due to a higher confidence in the prediction in collision risk. Post-construction monitoring is therefore essential in assessing the accuracy of the predictions and hence future adoption of the model within the industry.

The impact assessment rates the impact of displacement as medium both before and after mitigation and the impact of collisions as medium-high prior to mitigation and medium after mitigation. The residual impact is within the threshold which requires a biodiversity offset according to the National Biodiversity Offset Guidelines i.e. medium or higher. All proposed mitigation measures are supported and must be implemented. The recommendation with regards to the residual impacts is that the post-construction monitoring will be able to determine the actual impacts and allow the opportunity to evaluate if additional mitigation measures, which could take the form of a species offset. We wish to note that a pilot species offset is currently being investigated for impacts from a WEF on a bird species and can be used as a precedent if required. We therefore recommend that after two years of post-construction monitoring, an evaluation is undertaken whether a species offset or other additional mitigation is required, with the option of extending the evaluation period by another two years. We recommend that this should be included as a condition of approval.

## **Bat Impact Assessment**

The bat scoping study presented the preliminary results from the bat monitoring and indicated that recommendations would be provided once at least a full of monitoring is complete. The monitoring results are from December 2022 – March 2024. In general, bat activity is considered to be high on site with five species recorded and one species accounting for more than half of the records (*Laephotis capensis* – Cape roof bat).

Four masts scattered throughout the study area were used for the monitoring with the microphones at 10 m and also at 50 m and 100m for the one mast. A sensitivity map was developed and used as an informant to the development layout. The sensitivity is based on the buffer zones in the bat monitoring guidelines. The buffers are placed around features which are likely to support bat habitat e.g. water bodies, dwellings. No turbines are located within the areas mapped as medium-high or high sensitivity. The remainder of the site is medium sensitivity.

A number of impacts are identified, most of which are of medium significance before mitigation and low significance after mitigation. The exceptions are the impact of barotrauma and collision mortality which is rated high significance both before and after mitigation and the impact of the loss of foraging space which is rated high significance before mitigation and medium significance after mitigation. The residual impact for both of these impacts exceeds the threshold for biodiversity offsets. The overall impact on bats is however rated as medium before mitigation and low after mitigation.

A number of mitigation measures are proposed all of which are supported and must be implemented. Note that roof sealing should include the installation of one-way valves to allow an escape route for

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any bats trapped inside buildings. Mention is made of the potential use of bat deterrents, although their efficacy in South Africa is unknown. A recommendation could be to experimentally trial a deterrent on one or both sites. The description of the residual impacts per impact appears to address the residual impact after the VEF is decommissioned and therefore does not refer to the residual impact after following the mitigation hierarchy. Our recommendation is therefore that post-construction monitoring must be undertaken, and the impacts should be reviewed after a two year period to assess whether offsets of other additional mitigation measures are required, as was recommended for the avifaunal impact assessment.

## **Aquatic Impact Assessment**

An aquatic impact assessment was compiled for the Scoping Phase. The contents were broadly supported, and no major concerns were identified. The assessment recommended buffer zones for each of the aquatic features which were calculated using the buffer zone tool and can be considered relatively conservative. The buffer zones were used to inform the layout. The aquatic impact assessment has been updated for the EIA Phase with only minimal changes and therefore our previous comments remain relevant. Several impacts were identified all of which are rated as medium significance prior to mitigation and low significance after mitigation. The addendum assesses the current proposed layout with no changes to the assessment.

We wish to query why the delineation of the aquatic features and associated buffer zones were not used in the animal species impact assessment in determining the suitable habitat for riverine rabbits and hence the animal species sensitivity map.

## **Development Layout**

The informants to the development layout were queried during the Scoping Phase. An appendix has been provided indicating the iterations in the development of the current proposed layout and the informants which were used. The current preferred layout is the third iteration, with the description indicating the first revision is based on technical considerations, the second iteration included the bird, bat, aquatic biodiversity and terrestrial biodiversity no-go areas and the final iteration addressed the high visual impact sensitivities. It would however appear that the first iteration took into consideration sensitivities as a large proportion of the central/eastern part of the study area is devoid of turbines (possibly agricultural potential and/or bird and bat monitoring). We wish to query the terrestrial biodiversity constraints that were used as the only high sensitivity area identified is based on the modelled distribution of a plant species in the screening tool which needs to be ground-truthed.

While the description of the iterations used in the development of the layout provides clarity in terms of the investigation of alternatives and selection of the best practicable alternative from an environmental perspective, further confirmation is required that the preferred alternative has taken into account all the variables. We therefore recommend that a comparative table is provided for each of the specialist studies undertaken evaluating the proposed layout in relation to the identified sensitivities (and taking into account concerns raised about sensitivity mapping). In this regard we wish to note that recommendations can be grouped into preferred, not preferred but acceptable and not acceptable/no-go e.g. from a terrestrial biodiversity perspective, location on the cultivated lands may

be preferred, however location within least concern indigenous vegetation mapped as ESA and micro-sited on to a disturbance footprint may not be preferred but is acceptable.

## Conclusion

In conclusion, CapeNature recommends that the following concerns must be addressed prior to submission of the Final EIA Report:

- The terrestrial biodiversity impact assessment and plant species impact assessment should be subjected to a peer review to ensure that accurate ground-truthed descriptions and mapping of the habitats and SCCs present and associated sensitivity is provided. The footprints of the turbines and associated infrastructure should be ground-truthed.
- Additional pre-construction monitoring is required for the animal species impact assessment in order to provide more accurate data to inform the assessment.
- Post-construction monitoring must take place for the mammal SCCs, avifauna and bats according to the required/appropriate methodology. A re-evaluation of the residual impacts must be undertaken after two years of post-construction monitoring and a determination made whether biodiversity offsets or other additional mitigation measures are required. Provision should be made for a further extension of post-construction monitoring.
- Once the sensitivity mapping for the terrestrial biodiversity, plant species and animal species has been amended in accordance with the comments above, a matrix with inputs from all specialist studies should be provided confirming that the current preferred layout is the overall preferred layout or whether further amendments to the layout are required.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Marianne de Villiers, CapeNature

Adri Le Meyer, Department of Environmental Affairs and Development Planning

### References:

Helme, N. & Rebelo, T. 2016. Chapter 5: Ecosystem Guidelines, Renosterveld Ecosystems incorporating Coast and Inland Renosterveld. In: Cadman M., editor. *Ecosystem Guidelines for Environmental Assessment in the Western Cape*. 2nd Edition. Fynbos Forum, Cape Town.

Krug, C.B. (2004): *Practical Guidelines for the Restoration of Renosterveld*. University of Stellenbosch. Stellenbosch

Mucina L. & Rutherford M.C. (eds.): *The Vegetation of South Africa, Lesotho and Swaziland*; Strelitzia 19, South African National Biodiversity Institute, Pretoria, 2006, 807 pp. Price USD 60.-, ISBN-13: 978-1 919976-21-1, ISBN-10: 1-919976-21-3

South African National Biodiversity Institute (SANBI). 2020. *Species Environmental Assessment Guideline. Guidelines for the Implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for Environmental Impact Assessments in South Africa*. South African National Biodiversity Institute, Pretoria. Version 3.1. 2022.

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 15:01:29  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[Khoe\\_WEF\\_Koo\\_Valley\\_20240927.pdf](#)

---

FYI



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 2:56 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>; [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Hi all,

Further to my email earlier, comments from CapeNature on the Khoe WEF EIAR also suggests that a Revised EIAR be released for I&AP consultation. Should you submit the Final EIAR on 30/09/2024 and the DFFE grant an EA, you have a risk of several appeals being lodged against the EA.

Kind regards,  
Adri

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 14:32  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear ERM colleagues,

As indicated by HWC, their comments on the Hugo WEF are interim comments. There is always the opportunity to release revised reports, but it appears that this suggestion is not a viable one for you or the applicant. You are advised that submitting the Final EIAR without HWC's final comment on the Hugo WEF, you may prejudice the success of the application/s.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 13:09

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

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+27 60 739 6993

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 12:59 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC. These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

***HWC Committee Schedule 2024***

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Friday, September 27, 2024 12:29 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



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**Sadiya Salie**  
Consultant

---

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

---

**From:** [Redacted]  
**Sent:** Wednesday, September 25, 2024 12:10 PM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Sent:** Wednesday, September 25, 2024 11:47 AM  
**To:** [Redacted]  
[Redacted]  
**Cc:** [Redacted]  
[Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,



I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



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**Sadiya Salie**  
Consultant

---

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]

Cc: [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** [REDACTED]  
**Sent:** Monday, August 26, 2024 11:04 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query**

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

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Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public

Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**postal** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**physical** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Rhett Smart  
**telephone** 087 087 8017  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** LS14/2/6/1/9/1/Khoe\_WEF\_Koo Valley  
**date** **27 September 2024**

Environmental Resources Management Southern Africa  
1st Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
Cape Town,  
7700

Attention: Sadiya Salie  
By email: [hugokhoe@erm.com](mailto:hugokhoe@erm.com)

Dear Ms Salie

**Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality (DFFE ref. no.: 14/12/16/3/3/2/2516)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

**Terrestrial Biodiversity Impact Assessment and Botanical Impact Assessment**

The Western Cape Biodiversity Spatial Plan (BSP) should be the primary desktop informant for the terrestrial biodiversity impact assessment, of which the mapping is accurately reflected in Figure 3 of the terrestrial biodiversity impact assessment. Ecological Support Area 1 and 2 (ESA) covers a large percentage of the study area and the objectives as described in the BSP Guidelines are accurately reflected. The three vegetation types occurring in the study area as mapped in the National Vegetation Map are also included. The wind turbines are mostly located within the ESA on the site, however very few are located within the areas mapped as No Natural where natural habitat will not be impacted.

The methodology is described and references the protocols. While the desktop study is comprehensive and accurately reflected, the site verification is described as accompanying the faunal specialist to verify the screening tool results with two site visits in March and June. The protocol

requires “3.1.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment”. Neither of the site visits would have been within the optimal time of year in the winter rainfall region when species that are dormant the rest of the year would not be visible e.g. spring flowering annuals and geophytes. The Ecosystem Guidelines for Environmental Assessment state that for renosterveld “Undertake environmental assessments in spring (when the bulk of the annuals and bulbs are flowering), and in veld that is between 4 and 12 years old” (Helme & Rebelo 2016). The methodology of the fieldwork is not described in any further detail with regards to the areas which were assessed and whether any quantitative sampling was undertaken.

Seven vegetation surveys were conducted within the areas mapped as Matjiesfontein Shale Renosterveld and one within the North Langeberg Sandstone Fynbos and four habitats were identified namely Matjiesfontein Shale Renosterveld riparian habitat, Matjiesfontein Shale Renosterveld low shrubland, Matjiesfontein Shale Renosterveld drainage area and North Langeberg Sandstone Fynbos rocky outcrops. A few species are mentioned for each of these habitats and in this regard, we wish to query the vegetation classification. *Protea repens* is listed as a dominant species within the Matjiesfontein Shale Renosterveld low shrubland, however this species is a common species typical of fynbos. One of the key diagnostic features in separating fynbos and renosterveld is the absence of Proteaceae, Ericaceae and Restionaceae in the latter (Mucina & Rutherford 2006). This habitat is described occurring in the south west of the site, however this is where North Langeberg Sandstone Fynbos and South Langeberg Sandstone Fynbos are mapped. The dominant species occurring within North Langeberg Sandstone Fynbos rocky outcrops are listed as renosterbos (*Dicerotheramnus rhinocerotis*) and *Oedera genistifolia* which are typical of renosterveld. Therefore, clarification is required regarding the location of the 7 surveys and the accurate mapping of the vegetation types.

The protocols state that “the assessment must be based on the results of a site inspection undertaken on the preferred site and must identify: 2.3.7.2. terrestrial ecological support areas (ESAs), including: (a) the impact on the ecological processes that operate within or across the site; (b) the extent the proposed development will impact on the functionality of the ESA; and (c) loss of ecological connectivity (on site, and in relation to the broader landscape) due to the degradation and severing of ecological corridors or introducing barriers that impede migration and movement of flora and fauna;”

The above mapping of habitats must therefore be reconciled with the BSP mapping of the site, in particular the ESAs which are extensive. The extent of Critical Biodiversity Areas (CBAs) on site is negligible, but should nevertheless be avoided.

The site ecological importance (SEI) has been calculated for the three vegetation types mapped for the site and for terrestrial-aquatic ecotones. We wish to note that the SEI as described in the Species Environmental Assessment Guidelines is for the plant species and animal species themes. A draft Ecosystem Environmental Assessment Guideline has been developed but has not been approved for implementation. The SEI has however been used to inform the sensitivity map for the study area. With regards to the SEI calculations, we wish to query the rating of high receptor resilience for renosterveld, as renosterveld is known to have a low restoration potential if disturbed (Krug 2004). We further wish to query why the biodiversity importance for South Langeberg Sandstone Fynbos is medium while the other three are high. The SEI results are high for terrestrial-aquatic ecotones,



medium for Matjiesfontein Shale Renosterveld and North Langeberg Sandstone Fynbos and low for South Langeberg Sandstone Fynbos.

The SEI Map (Figure 5) does not correlate with the mapping of the above four ecosystems which were assessed. The high sensitivity areas are recommended as a no-go with the motivation provided of the presence of a highly sensitive floral species. The sensitivity map for the terrestrial biodiversity impact assessment is therefore actually the sensitivity map for the plant species theme. The sensitivity map reflecting the habitats identified and associated sensitivities should therefore be provided as the sensitivity map for the terrestrial biodiversity theme.

The protocols state that “2.3.6. the assessment must identify any alternative development footprints within the preferred site which would be of a low sensitivity as identified by the screening tool and verified through the site sensitivity verification.” We note that only 6 of the 29 turbines are located within the low sensitivity areas of Figure 5.2.2., however it is acknowledged that sensitivities identified in other studies also need to be considered. The protocol states that “2.2. the assessment must be undertaken on the preferred site and within the proposed development footprint”, therefore it is interpreted that the footprints of the turbines need to be ground-truthed.

Five potential impacts are identified and are rated as medium prior to mitigation and low after mitigation, apart from mortality due to collisions which is rated as high prior to mitigation. We wish to note that some of the impacts assessed are best addressed in other specialist studies undertaken such as chemical contamination and the collision risk which is assessed in the avifaunal and bat impact assessments.

In general, the terrestrial biodiversity impact assessment is significantly flawed as described above. The habitats present on site are not accurately described and mapped in order to reconcile with the desktop information. The land cover mapping indicates the land uses which have resulted in transformation and disturbance to the natural habitats that would have been present. There is however no map provided indicating the habitats identified on site and the transformed areas which should be used to inform the sensitivity of the site and the development layout (refer to comments regarding Figure 5). We therefore recommend that a peer review is undertaken of the terrestrial biodiversity impact assessment to ensure that the habitats and associated sensitivities are accurately identified and mapped.

The Botanical Impact Assessment addresses the plant species theme which relates to the potential impact on plant species of conservation concern (SCCs). The methodology for the botanical impact assessment is a duplication of the terrestrial biodiversity assessment and includes the above description of habitats present. The Botanical Scoping Report indicated that belt transects would be undertaken in the EIA Phase however it is not evident that this has been undertaken. The protocols state that the Terrestrial Plant Species Specialist Assessment must be undertaken in accordance with the Species Environmental Assessment Guideline (SANBI 2020).

The list of the plant SCCs listed in the screening tool is presented however there is no indication whether any of these species occur on site or the likelihood of their occurrence or whether an attempt was made to locate any of these species. The protocol states that “2.3.1 Identify the SCC which were found, observed or are likely to occur within the study area”. 2.3.2 – 2.3.12 follow-on from the SCCs which are identified in the site assessment or are considered to be likely to occur on the site. Similarly to the terrestrial biodiversity assessment, the footprints of the turbines should be ground-truthed. Section 10.1 of the Species Environmental Assessment Guideline provides guidelines for undertaking a plant species assessment, including the recommended fieldwork methodology.

The calculation of the SEI and the SEI map in the botanical impact assessment is a duplication of the terrestrial biodiversity assessment. The SEI is however relevant to the botanical impact assessment as it is undertaken in terms of the Species Environmental Assessment Guideline. The SEI should however reference the plant SCCs as opposed to the habitat types occurring in the study area, although the SCCs occurring in the same habitat can be grouped. The SEI map is more relevant to the botanical impact assessment as previously mentioned. The map appears to be based on the screening tool map and the high sensitivity attributed to two species, one of which cannot be named in a public report and is listed as sensitive species 207. The impact assessment is a duplication of the terrestrial biodiversity assessment.

In general, the botanical impact assessment is highly flawed similarly to the terrestrial biodiversity assessment and does not comply with the protocols and Species Environmental Assessment Guideline. We therefore recommend that the botanical impact assessment should also be subject to a peer review. The impacts on terrestrial biodiversity and plant SCCs may not be above unacceptable thresholds, however there is currently insufficient information to assess the impacts and proposed layout, more specifically ground-truthed information. The outcomes and recommendations are based on the desktop information.

## **Animal Species Impact Assessment**

The animal species impact assessment has been updated to include an assessment of impacts and has included an evaluation of *Aloeides caledoni* (Caledon copper) which was queried in the Scoping Phase. The latter species is considered unlikely to occur within the development footprint and the motivation is supported. CapeNature recommended that additional fieldwork is required in our comments in the Scoping Phase, which included camera traps at additional locations and supplementary methodologies. However, no additional fieldwork has been undertaken and the impact assessment report is based on the information presented in the Scoping Phase report. We will not repeat our previous comments which remain relevant and included the reference to only two camera trap localities which are not fully representative of the habitats over the large study area. Drive transects were proposed for the EIA Phase however it is not apparent that this was undertaken. We recommend that the additional fieldwork as included in our comments in the Scoping Phase should be undertaken prior to commencement of construction. We wish to note that the comments and response report has mixed up the responses regarding the adjacent proposed Hugo Wind Energy Facility where there were confirmed sightings of riverine rabbit (*Bunolagus monticularis*).

Data regarding the records of species other than the three targeted SCCs have been provided as requested. A total number of 66 species were recorded, with the most frequently recorded species apart from livestock and birds consisting of hares (*Lepus sp.*), black-backed jackal (*Canis mesomelas*) and African wild cat (*Felis lybica*). Confirmation must be provided that no other SCCs were recorded on the camera traps.

The comments and response report indicates that the Endangered Wildlife Trust (EWT) will be consulted in the EIA Phase regarding riverine rabbits and incorporating appropriate mitigation and conservation measures as part of the project proposal. Mitigation measures could include stewardship and habitat restoration. Further detail is provided regarding the species including studies which confirm that the species utilizes previously degraded areas which have been restored.

The SEI was calculated for the three SCCs during the Scoping Phase with medium sensitivity for riverine rabbit and low sensitivity for leopard and grey rhebuck. The mapping from the screening tool for the riverine rabbit was used to inform the sensitivity map. The SEI is not however included in the EIA Phase report. The SEI should be used to inform the sensitivity map for the EIA phase and should be based on the mapping of suitable habitat for the SCCs. Riverine rabbits have fairly specific habitat requirements associated with watercourses and suitable habitat should be mapped. The sensitivity map presented in Figure 6 is based on habitat condition, with the natural and near-natural habitat mapped as medium sensitivity and the agricultural fields as low sensitivity. There is a similarity with the sensitivity map for the terrestrial biodiversity and botanical impact assessments but not a full match. Additional explanation is required regarding the sensitivity map in relation to the SEI for the three SCCs and the habitats utilized by these species.

Several impacts have been identified throughout the life cycle of the WEF related to habitat loss, disturbance and mortality, with the impact significance prior to mitigation for all rated medium, and after mitigation either reduced to low or changed to medium positive. The medium positive impact relates to the proposal for habitat restoration within the study area. None of the impacts have a residual impact of medium or higher and therefore do not trigger the requirement for a biodiversity offset. Although riverine rabbits were not confirmed to be present on the site, the confirmed presence on nearby properties could motivate for the protection of suitable habitat for this species within the study area in collaboration with EWT.

The mitigation measures proposed mainly relate to changes to the land practices on the affected properties and therefore requires that buy-in from a third party for the mitigation to be implemented. The impact ratings of a positive impact make several assumptions which would include landowner buy-in and extensive habitat restoration and reduction in agricultural activity. Confirmation of the landowner willingness would be required prior to submission of the Final EIA Report in order for this mitigation to be accepted. EWT could play an important role in this regard. We further note the areas proposed for restoration in the sensitivity map and wish to query the selection of these areas. It would be assumed that the areas which would be targeted for riverine rabbit would be the watercourses with an increase in the existing buffer for agricultural activities. We further wish to note that while the proposed mitigation is fully supported from a biodiversity perspective, it may be in

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Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

conflict with recommendations from other sectors such as agriculture and may require further negotiation.

It is recommended that post-construction monitoring is implemented for a period of at least two years and included in the Environmental Management Programme Report. This should include as a minimum:

- Monitoring of riverine rabbit habitat condition, e.g. monitoring impacts of construction and operation, and the reduction in livestock and/or game stocking rates, on soil and vegetation.
- Monitoring to establish changes in presence, reproduction, recruitment and activity patterns of SCC, especially riverine rabbit, due to development-related disturbance.
- Monitoring the impacts of linear infrastructure, such as roadkill and erosion due to increased road traffic. Should a roadkill of a SCC occur, the circumstances must be investigated, and steps taken to prevent a reoccurrence. Riverine rabbit carcasses must be made available for genetic research.

The following additional mitigation measures are recommended:

- A reduction in the stocking rate of game and livestock will facilitate habitat recovery and habitat restoration projects. The recommended ecological stocking rates for both properties must be determined by an expert and formally agreed to by the relevant landowner(s) prior to the onset of development. This may require compensation for loss of income.
- Relocation of any fauna in the construction area must be done by a suitably qualified person, e.g. trained snake handler.
- Construction activity should not only be minimized from dusk and dawn, but also during the hour after dawn and hour before dusk. In winter especially, this is a period when many animals (including riverine rabbit) are still active.
- Minimization of lighting used to illuminate construction areas and site buildings. – recommend exploring the use of UV lights.
- The development footprint should avoid No-Go/ High Sensitivity areas completely, not “as much as possible”.

## **Avifaunal Impact Assessment**

An avifaunal impact assessment was included within the Scoping Phase. The Scoping Phase impact assessment has been updated with the current preferred layout with two less turbines than previously. The revised layout was factored into the collision risk model with the result of slightly lower risks for the species assessed.

CapeNature had queried the implementation of the buffers from nests for Black Harriers and Verreaux’s Eagles in accordance with the species-specific monitoring guidelines. There were turbines located within the recommended 3.7 km buffer from a Verreaux’s Eagle nest, however it was recommended to rather use the modelled flights of the collision risk model than the generic radius around the nest as this is considered as a more accurate reflection of the flight paths. The motivation is accepted.

The collision risk model is only being used for the second time for this facility and the adjacent Hugo WEF. Use of collision risk modelling could potentially be a significant step forward in designing WEFs to minimize the impact of bird collisions due to a higher confidence in the prediction in collision risk. Post-construction monitoring is therefore essential in assessing the accuracy of the predictions and hence future adoption of the model within the industry.

The impact assessment rates the impact of displacement as medium both before and after mitigation and the impact of collisions as medium-high prior to mitigation and medium after mitigation. The residual impact is within the threshold which requires a biodiversity offset according to the National Biodiversity Offset Guidelines i.e. medium or higher. All proposed mitigation measures are supported and must be implemented. The recommendation with regards to the residual impacts is that the post-construction monitoring will be able to determine the actual impacts and allow the opportunity to evaluate if additional mitigation measures, which could take the form of a species offset. We wish to note that a pilot species offset is currently being investigated for impacts from a WEF on a bird species and can be used as a precedent if required. We therefore recommend that after two years of post-construction monitoring, an evaluation is undertaken whether a species offset or other additional mitigation is required, with the option of extending the evaluation period by another two years. We recommend that this should be included as a condition of approval.

## **Bat Impact Assessment**

The bat scoping study presented the preliminary results from the bat monitoring and indicated that recommendations would be provided once at least a full of monitoring is complete. The monitoring results are from December 2022 – March 2024. In general, bat activity is considered to be high on site with five species recorded and one species accounting for more than half of the records (*Laephotis capensis* – Cape roof bat).

Four masts scattered throughout the study area were used for the monitoring with the microphones at 10 m and also at 50 m and 100m for the one mast. A sensitivity map was developed and used as an informant to the development layout. The sensitivity is based on the buffer zones in the bat monitoring guidelines. The buffers are placed around features which are likely to support bat habitat e.g. water bodies, dwellings. No turbines are located within the areas mapped as medium-high or high sensitivity. The remainder of the site is medium sensitivity.

A number of impacts are identified, most of which are of medium significance before mitigation and low significance after mitigation. The exceptions are the impact of barotrauma and collision mortality which is rated high significance both before and after mitigation and the impact of the loss of foraging space which is rated high significance before mitigation and medium significance after mitigation. The residual impact for both of these impacts exceeds the threshold for biodiversity offsets. The overall impact on bats is however rated as medium before mitigation and low after mitigation.

A number of mitigation measures are proposed all of which are supported and must be implemented. Note that roof sealing should include the installation of one-way valves to allow an escape route for

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any bats trapped inside buildings. Mention is made of the potential use of bat deterrents, although their efficacy in South Africa is unknown. A recommendation could be to experimentally trial a deterrent on one or both sites. The description of the residual impacts per impact appears to address the residual impact after the VEF is decommissioned and therefore does not refer to the residual impact after following the mitigation hierarchy. Our recommendation is therefore that post-construction monitoring must be undertaken, and the impacts should be reviewed after a two year period to assess whether offsets of other additional mitigation measures are required, as was recommended for the avifaunal impact assessment.

## **Aquatic Impact Assessment**

An aquatic impact assessment was compiled for the Scoping Phase. The contents were broadly supported, and no major concerns were identified. The assessment recommended buffer zones for each of the aquatic features which were calculated using the buffer zone tool and can be considered relatively conservative. The buffer zones were used to inform the layout. The aquatic impact assessment has been updated for the EIA Phase with only minimal changes and therefore our previous comments remain relevant. Several impacts were identified all of which are rated as medium significance prior to mitigation and low significance after mitigation. The addendum assesses the current proposed layout with no changes to the assessment.

We wish to query why the delineation of the aquatic features and associated buffer zones were not used in the animal species impact assessment in determining the suitable habitat for riverine rabbits and hence the animal species sensitivity map.

## **Development Layout**

The informants to the development layout were queried during the Scoping Phase. An appendix has been provided indicating the iterations in the development of the current proposed layout and the informants which were used. The current preferred layout is the third iteration, with the description indicating the first revision is based on technical considerations, the second iteration included the bird, bat, aquatic biodiversity and terrestrial biodiversity no-go areas and the final iteration addressed the high visual impact sensitivities. It would however appear that the first iteration took into consideration sensitivities as a large proportion of the central/eastern part of the study area is devoid of turbines (possibly agricultural potential and/or bird and bat monitoring). We wish to query the terrestrial biodiversity constraints that were used as the only high sensitivity area identified is based on the modelled distribution of a plant species in the screening tool which needs to be ground-truthed.

While the description of the iterations used in the development of the layout provides clarity in terms of the investigation of alternatives and selection of the best practicable alternative from an environmental perspective, further confirmation is required that the preferred alternative has taken into account all the variables. We therefore recommend that a comparative table is provided for each of the specialist studies undertaken evaluating the proposed layout in relation to the identified sensitivities (and taking into account concerns raised about sensitivity mapping). In this regard we wish to note that recommendations can be grouped into preferred, not preferred but acceptable and not acceptable/no-go e.g. from a terrestrial biodiversity perspective, location on the cultivated lands may

be preferred, however location within least concern indigenous vegetation mapped as ESA and micro-sited on to a disturbance footprint may not be preferred but is acceptable.

## Conclusion

In conclusion, CapeNature recommends that the following concerns must be addressed prior to submission of the Final EIA Report:

- The terrestrial biodiversity impact assessment and plant species impact assessment should be subjected to a peer review to ensure that accurate ground-truthed descriptions and mapping of the habitats and SCCs present and associated sensitivity is provided. The footprints of the turbines and associated infrastructure should be ground-truthed.
- Additional pre-construction monitoring is required for the animal species impact assessment in order to provide more accurate data to inform the assessment.
- Post-construction monitoring must take place for the mammal SCCs, avifauna and bats according to the required/appropriate methodology. A re-evaluation of the residual impacts must be undertaken after two years of post-construction monitoring and a determination made whether biodiversity offsets or other additional mitigation measures are required. Provision should be made for a further extension of post-construction monitoring.
- Once the sensitivity mapping for the terrestrial biodiversity, plant species and animal species has been amended in accordance with the comments above, a matrix with inputs from all specialist studies should be provided confirming that the current preferred layout is the overall preferred layout or whether further amendments to the layout are required.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Marianne de Villiers, CapeNature

Adri Le Meyer, Department of Environmental Affairs and Development Planning

### References:

Helme, N. & Rebelo, T. 2016. Chapter 5: Ecosystem Guidelines, Renosterveld Ecosystems incorporating Coast and Inland Renosterveld. In: Cadman M., editor. *Ecosystem Guidelines for Environmental Assessment in the Western Cape*. 2nd Edition. Fynbos Forum, Cape Town.

Krug, C.B. (2004): *Practical Guidelines for the Restoration of Renosterveld*. University of Stellenbosch. Stellenbosch

Mucina L. & Rutherford M.C. (eds.): *The Vegetation of South Africa, Lesotho and Swaziland*; Strelitzia 19, South African National Biodiversity Institute, Pretoria, 2006, 807 pp. Price USD 60.-, ISBN-13: 978-1 919976-21-1, ISBN-10: 1-919976-21-3

South African National Biodiversity Institute (SANBI). 2020. *Species Environmental Assessment Guideline. Guidelines for the Implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for Environmental Impact Assessments in South Africa*. South African National Biodiversity Institute, Pretoria. Version 3.1. 2022.



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 15:16:12  
**Attachments:** [image001.png](#)  
[image003.png](#)

---

Hi Adri,

We will provide a formal response to HWC by Monday, 30<sup>th</sup> September.

Kind Regards



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**ERM**

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>

**Sent:** Friday, September 27, 2024 2:32 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear ERM colleagues,

As indicated by HWC, their comments on the Hugo WEF are interim comments. There is always the opportunity to release revised reports, but it appears that this suggestion is not a viable one for you or the applicant. You are advised that submitting the Final EIA without HWC's final comment on the Hugo WEF, you may prejudice the success of the application/s.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 13:09

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 12:59 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC.

These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

### **HWC Committee Schedule 2024**

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

**From:** [Redacted] >

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:47 AM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
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Cape Town

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**

**Application forms 2024:**

[Applications Link](#)

**[Notice](#)**

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



---

**From:** Stephanie Barnardt <[Stephanie.Barnardt@westerncape.gov.za](mailto:Stephanie.Barnardt@westerncape.gov.za)>

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query**

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)





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**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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If you are not the intended recipient you may not copy or deliver this message to anyone."

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The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.  
If you are not the intended recipient you may not copy or deliver this message to anyone."

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.  
The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise.  
If you are not the intended recipient you may not copy or deliver this message to anyone."

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative.  
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If you are not the intended recipient you may not copy or deliver this message to anyone."

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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 15:16:05  
**Attachments:** [image001.png](#)  
[image003.png](#)

---

Hi Adri,

We will provide a formal response to HWC by Monday, 30<sup>th</sup> September.

Kind Regards



Sustainability is our business

**ERM**

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 2:32 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear ERM colleagues,

As indicated by HWC, their comments on the Hugo WEF are interim comments. There is always the opportunity to release revised reports, but it appears that this suggestion is not a viable one for you or the applicant. You are advised that submitting the Final EIA without HWC's final comment on the Hugo WEF, you may prejudice the success of the application/s.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 13:09

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 12:59 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC.

These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further communication.

### **HWC Committee Schedule 2024**

**Kind regards**

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com). [Learn why this is important](#)

Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards



Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

**From:** [Redacted]

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:47 AM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [Redacted]. [Learn why this is important](#)

Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** [Redacted]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [Redacted] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**



**Application forms 2024:**

[Applications Link](#)

**[Notice](#)**

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



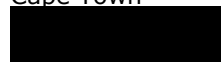
**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



---

**From:** [REDACTED] >  
**Sent:** Monday, August 26, 2024 11:04 AM  
**To:** [REDACTED]; ERM Hugo & Khoe Wind Energy Facilities  
<[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query**

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
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Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** Sadiya Salie <[Sadiya.Salie@erm.com](mailto:Sadiya.Salie@erm.com)>

**Sent:** Friday, August 23, 2024 3:32 PM

**To:** [REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

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**From:** [Redacted]  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 15:21:51  
**Attachments:** [image006.png](#)  
[image008.png](#)

**EXTERNAL MESSAGE**

Dear Sadiya,  
I understand these comments were received out of the comment period; however, it would be appreciated if you would please include a response to DEADP as well as CapeNature as received in previous emails.  
I believe you will still make your deadline for submission of the Final EIAR on Monday 30/09/24.

Regards  
Ms. Azrah Essop

**Environmental Officer: Priority Infrastructure Projects**  
**Registered Environmental Assessment Practitioner: 2021/3915**

Department of Forestry, Fisheries and the Environment  
Environment House  
473 Steve Biko and Soutpansberg Streets  
PRETORIA

[Redacted]  
[Redacted]  
[Redacted]

Call Centre: 086 111 2468



**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Friday, 27 September 2024 15:16

**To:** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Adri,

We will provide a formal response to HWC by Monday, 30<sup>th</sup> September.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 2:32 PM

**To:** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear ERM colleagues,

As indicated by HWC, their comments on the Hugo WEF are interim comments. There is always the opportunity to release revised reports, but it appears that this suggestion is not a viable one for you or the applicant. You are advised that submitting the Final EIAR without HWC's final comment on the Hugo WEF, you may prejudice the success of the application/s.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 13:09

**To:** [REDACTED]

[REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thanks Waseefa. The deadline for the final EIA report is 30 September 2024.

I will contact John, however we may not be able to provide you with a formal response by Monday and the interim comments will then have to be considered in the Final EIA.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[REDACTED]

**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 12:59 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Dear Sadiya

Thank you for the below.

Could you please facilitate a formal response to be prepared by John Gribble along with any appendices to be sent to HWC. These can be reviewed and HWC can issue a final comment and close the case off.

Irrespective of the support or not for the project, as it stands the comment is an interim comment and the decision making authority requires a final comment.

Please send on to [@Stephanie Barnardt](#) as the case officer who will be in further

communication.

**HWC Committee Schedule 2024**

Kind regards

**Waseefa Dhansay**  
**Assistant Director: Professional Services**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 12:29 PM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Hi Waseefa,

Regarding the request for a cumulative map. Kindly note Cumulative maps have been include in Volume I - Draft EIA Report.

Kind Regards

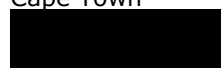


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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Thursday, September 26, 2024 12:58 PM

**To:** [Redacted]  
[Redacted]



[REDACTED]  
Cc: [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Thank you Waseefa.

Kindly note we have included motivation within the final EIA Report, justifying why the turbines are located within the high visual sensitive areas.

There are currently no approved WEF facilities adjacent to these proposed projects.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** Waseefa Dhansay <[Waseefa.Dhansay@westerncape.gov.za](mailto:Waseefa.Dhansay@westerncape.gov.za)>

**Sent:** Wednesday, September 25, 2024 12:10 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached the Comments from HWC for the two projects.

[HWC Committee Schedule 2024](#)

Kind regards

**Waseefa Dhansay**  
Assistant Director: Professional Services

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:47 AM

**To:** [Redacted]  
[Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [Redacted]. [Learn why this is important](#)

Hi Waseefa,

I trust you are well.

Are you able to please advise on the below.

Kind Regards



Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

[Redacted]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Wednesday, September 25, 2024 11:39 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

I trust you well.

I am following up on the comments from HWC. The deadline for comments has passed; however we are able to address comments if submitted by COB today.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

**From:** [REDACTED]

**Sent:** Tuesday, August 27, 2024 2:23 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>; [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day

The HIA is to be heard this Monday, 2 September.  
HWC comment to follow.

**Kind regards,**

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



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**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Monday, August 26, 2024 11:25 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stephanie,

The HWC Ref number for Khoe WEF is HWC23110807SB1124.

Thank you,

Kind Regards



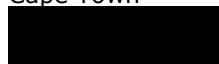
**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



---

**From:** [Redacted]

**Sent:** Monday, August 26, 2024 11:04 AM

**To:** [Redacted]  
[Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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**EXTERNAL MESSAGE**

Good day

Please can you provide me with HWC reference number for me to provide you with a comment.

If there was no NID trigger, please note that HWC cannot comment on matters that do not form part of our mandate.

**Please include your HWC reference number in future correspondence to assist in responding to your query promptly.**

**Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query**

Kind regards,

**Application forms 2024:**

[Applications Link](#)

[Notice](#)

**Stephanie-Anne Barnardt-Delport**  
**Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745)**  
**Heritage Western CapeTel: (+27) 021 829 3315**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



---

**From:** [REDACTED]  
**Sent:** Friday, August 23, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)

---

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If you are not the intended recipient you may not copy or deliver this message to anyone."

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Draft EIA Report: Khoe Wind Energy Facility  
**Date:** Friday, 27 September 2024 15:27:15  
**Attachments:** [image003.png](#)

---

Hi Azrah,

Please see below response to Cape Nature.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>

**Sent:** Friday, September 27, 2024 1:58 PM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Draft EIA Report: Khoe Wind Energy Facility

Hi Rhett,

Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]



**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 1:43 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Draft EIA Report: Khoe Wind Energy Facility

EXTERNAL MESSAGE

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality.

Regards

Rhett

**Rhett Smart**  
Land Use Scientist | South Landscape



[REDACTED]  
[REDACTED] postal 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200  
physical 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200  
[www.capenature.co.za](http://www.capenature.co.za)

**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Friday, 27 September 2024 15:33:16  
**Attachments:** [image001.png](#)  
[4 10 4 H40A Khoe Wind Energy 270924.pdf](#)

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day,  
Please find attached comment as requested.  
Kind regards  
Elkerine

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, 13 September 2024 14:08  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](#)>  
**Sent:** Tuesday, August 27, 2024 10:09 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



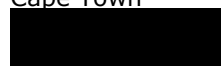
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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town





**BREED-OLIFANTS**  
CATCHMENT MANAGEMENT AGENCY

Cnr Mountain Mill & East Lake Roads, Worcester 6850, Private Bag X 3055, Worcester, 6850

Enquiries : E.Rossouw

Your Ref: DFFE Reference: 14/12/16/3/3/2/2515 and 14/12/16/3/3/2/2516  
Our Ref: 4/10/4/H40A/Khoe Wind Energy Facility, Worcester

Date: 27/09/2024

ERM  
1<sup>st</sup> Floor  
240 Main Road  
Rondebosch  
Great Westerford  
CAPE TOWN  
8000

Attention: Saiya Salie

To whom it may concern

**COMMENTS: THE PROPOSED HUGO AND KHOE WIND ENERGY FACILITY,  
NEAR DE DOORNS, WESTERN CAPE PROVINCE**

The Breede-Olifants Catchment Management Agency (BOCMA) has received the final scoping report for the abovementioned project, dated 23 August 2024 and provides the following comment in support of the application:

1. The Finalised footprint for the facility must be used to apply for a water use authorisation for the placement of the infrastructure and river crossings before the commencement of the activity.
2. The applicant should include a detailed Risk, mitigation and rehabilitation implementation plan based on the Freshwater report specialist recommendations in the final documents for assessment in terms of Section 21(c) and 21(i) of the National Water Act, 1998 (act 36 of 1998).
3. The applicant must ensure that the standard conditions of the Government Gazette Notice number 49833, dated 8 December 2023 is considered within the operational plans of the facility.
4. Refined lay-out should avoid, in as far as possible any wetland and riparian habitat of water courses.
5. The applicant must ensure that correct processes are followed for the temporary transfer of water rights during the construction phase of the application.
6. A river maintenance management plan should be included in the Environmental Management Plan for any crossings of water courses.

Due to the proximity and the proposed impacts of all the options considered, the applicant must apply for a water use licence, as soon as the final designs, layouts and reports are available using the e-ewulaas platform of the Department of Water and Sanitation.

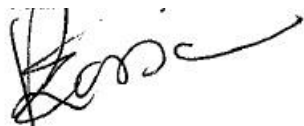
#### **General conditions**

- No water must be taken from a water resource for any purpose without authorisation from the National Water Act, 1998 (Act 36 of 1998).
- No waste or water containing waste may be disposed without authorisation from the National Water Act, 1998 (Act 36 of 1998) and National Environmental Management: Waste Act, 2008 (Act 59 of 2008).
- All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered to.
- No pollution of surface water or groundwater resources may occur.
- Stormwater management must be addressed both in terms of flooding, erosion and pollution potential.
- No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities may be discharged into a water resource. Polluted stormwater must be contained.

Please be advised that no activities may commence without the appropriate approvals/authorizations where needed from the responsible authority. The onus remains with the registered property owner to confirm adherence to any relevant legislation that such activities might trigger and/or need authorisation for.

This office reserves the right to amend and revise its comments as well as to request any further information.

Please do not hesitate to contact this office if you have any further queries. Please ensure to quote the above reference in doing so.



**JAN VAN STADEN**  
**CHIEF EXECUTIVE OFFICER (ACTING)**

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)  
**Date:** Friday, 27 September 2024 15:38:32  
**Attachments:** [image001.png](#)

---

Dear Thea,

Kindly note that the commenting period has passed, therefore comments will not be considered in the final EIA Report. Comments will be attached upon submission to DFFE.

Please confirm if comments on Khoe WEF are still to be provided?

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 26, 2024 4:55 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

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**EXTERNAL MESSAGE**

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan  
Pr. Pl. (A/1237/2002)  
**Director: Development Facilitation**  
Department of Environmental Affairs and Development Planning  
Western Cape Government  
11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093  
Email: [Thea.Jordan@westerncape.gov.za](mailto:Thea.Jordan@westerncape.gov.za)  
Website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)



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---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 23, 2024 15:32

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
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**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)  
**Date:** Friday, 27 September 2024 15:38:27  
**Attachments:** [image001.png](#)

---

Dear Thea,

Kindly note that the commenting period has passed, therefore comments will not be considered in the final EIA Report. Comments will be attached upon submission to DFFE.

Please confirm if comments on Khoe WEF are still to be provided?

Thank you,

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, September 26, 2024 4:55 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

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Yours faithfully

Thea Jordan  
Pr. Pl. (A/1237/2002)  
**Director: Development Facilitation**  
Department of Environmental Affairs and Development Planning  
Western Cape Government  
11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093  
Email: [Thea.Jordan@westerncape.gov.za](mailto:Thea.Jordan@westerncape.gov.za)  
Website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)



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---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 23, 2024 15:32

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com). [Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)  
**Date:** Friday, 27 September 2024 15:41:34  
**Attachments:** [image001.png](#)

**EXTERNAL MESSAGE**

Dear Sadiya,

We acknowledge that the commenting period has lapsed and our comments will not be considered in the Final EIA Report. The Department will endeavour to provide comments on the Draft EIAR for the Khoe WEF – these comments will be submitted directly to the DFFE for their consideration on 30 September 2024.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, September 27, 2024 15:38  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

Dear Thea,

Kindly note that the commenting period has passed, therefore comments will not be considered in the final EIA Report. Comments will be attached upon submission to DFFE.

Please confirm if comments on Khoe WEF are still to be provided?

Thank you,

Kind Regards



**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Thursday, September 26, 2024 4:55 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

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**EXTERNAL MESSAGE**

Dear EAP,

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Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan

Pr. Pl. (A/1237/2002)

**Director: Development Facilitation**

Department of Environmental Affairs and Development Planning

Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093

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Website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)



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---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 23, 2024 15:32

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns,

Western Cape Province

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Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

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Thank you and regards,



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)  
**Date:** Friday, 27 September 2024 15:58:47  
**Attachments:** [image001.png](#)

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Thank you Adri.

Kind Regards



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Consultant

---

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---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 3:41 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

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**EXTERNAL MESSAGE**

Dear Sadiya,

We acknowledge that the commenting period has lapsed and our comments will not be considered in the Final EIA Report. The Department will endeavour to provide comments on the Draft EIAR for the Khoe WEF – these comments will be submitted directly to the DFFE for their consideration on 30 September 2024.

Kind regards,  
Adri

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 27, 2024 15:38

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]



[REDACTED]  
**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

Dear Thea,

Kindly note that the commenting period has passed, therefore comments will not be considered in the final EIA Report. Comments will be attached upon submission to DFFE.

Please confirm if comments on Khoe WEF are still to be provided?

Thank you,

Kind Regards



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**Sadiya Salie**  
Consultant

---

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Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Thursday, September 26, 2024 4:55 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Comments on the Draft EIA Report for the proposed 336MW Hugo WEF ear De Doorns, Western Cape Province (14/12/16/3/3/2/2515)

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**EXTERNAL MESSAGE**

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan  
Pr. Pl. (A/1237/2002)

**Director: Development Facilitation**

Department of Environmental Affairs and Development Planning  
Western Cape Government  
11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093

Email: [Thea.Jordan@westerncape.gov.za](mailto:Thea.Jordan@westerncape.gov.za)

Website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)



Be 110% Green. Read from the screen.

Should you not be able to contact the number above, please call +27 (0)21 483 4091 between 07:30-16:00.

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 23, 2024 15:32

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [hugokhoe@erm.com](mailto:hugokhoe@erm.com). [Learn why this is important](#)

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of

the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Draft EIA Report: Hugo Wind Energy Facility, De Doorns  
**Date:** Monday, 30 September 2024 08:53:02  
**Attachments:** [Hugo\\_WEF\\_De\\_Doorns\\_20240929.pdf](#)  
**Importance:** High

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**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Hugo Wind Energy Facility, De Doorns, Breede Valley Municipality.

Regards

Rhett

**Rhett Smart**  
Land Use Scientist | South Landscape



[REDACTED]  
[REDACTED] postal 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200  
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**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** LS14/2/6/1/9/2/Hugo\_WEF\_De Doorns  
**date** 29 September 2024

Environmental Resources Management Southern Africa  
1st Floor  
Great Westerford  
240 Main Road  
Rondebosch  
Cape Town  
7700

Attention: Sadiya Salie  
By email: [hugokhoe@erm.com](mailto:hugokhoe@erm.com)

Dear Ms Salie

**Draft Environmental Impact Assessment Report for the Proposed Hugo Wind Energy Facility, De Doorns, Breede Valley Municipality (DFFE ref. no.: 14/12/16/3/3/2/2515)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

**Terrestrial Biodiversity Impact Assessment and Botanical Impact Assessment**

The Western Cape Biodiversity Spatial Plan (BSP) should be the primary desktop informant for the terrestrial biodiversity impact assessment, of which the mapping is accurately reflected in Figure 3 of the terrestrial biodiversity impact assessment. Ecological Support Area I (ESA) occupies the majority of the study area with a section of Critical Biodiversity Area I (CBA) in the east, No Natural in the north-east and patches in the centre and Protected Area in the south west associated with the Matroosberg Mountain Catchment Area (MCA). The objectives as described in the BSP Guidelines are accurately reflected. The four vegetation types occurring in the study area as mapped in the National Vegetation Map are also included. The wind turbines are mostly located within the ESA on the site, with a few located in the MCA and No Natural.

The methodology is described and references the protocols. While the desktop study is comprehensive and accurately reflected, the site verification is described as accompanying the faunal specialist to verify the screening tool results with two site visits in March and June. The protocol requires “3.1.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment”. Neither of the site visits would have been within the optimal time of year in the winter rainfall region when species that are dormant the rest of the year would not be visible e.g. spring flowering annuals and geophytes. The Ecosystem Guidelines for Environmental Assessment state that for renosterveld “Undertake environmental assessments in spring (when the bulk of the annuals and bulbs are flowering), and in veld that is between 4 and 12 years old” (Helme & Rebelo 2016). The methodology of the fieldwork is not described in any further detail with regards to the areas which were assessed and whether any quantitative sampling was undertaken.

Ten vegetation surveys were conducted within the areas mapped as Matjiesfontein Shale Renosterveld. No surveys were conducted within the North Langeberg Sandstone Fynbos and South Langeberg Sandstone Fynbos due to inaccessibility and a single survey within the Matjiesfontein Quartzite Fynbos. Five habitats were identified namely Matjiesfontein Quartzite Fynbos low shrubland, Matjiesfontein Shale Renosterveld riparian habitat, Matjiesfontein Shale Renosterveld low shrubland, Matjiesfontein Shale Renosterveld drainage area and Matjiesfontein Shale Renosterveld rocky outcrops. A few species are mentioned for each of these habitats and therefore it is not possible to interrogate if these correlate with the relevant vegetation type, however no major red flags are evident in this regard. The extent of these habitat have not however been mapped. We do however wish to raise concern that the two sandstone fynbos vegetation types and the MCA were not accessible, as wind turbines are proposed in this area and inaccessible topography would be more sensitive to development due to the additional earthworks for a level building surface and exacerbated erosion risk from the steep slopes.

The protocols state that “the assessment must be based on the results of a site inspection undertaken on the preferred site and must identify: 2.3.7.2. terrestrial ecological support areas (ESAs), including: (a) the impact on the ecological processes that operate within or across the site; (b) the extent the proposed development will impact on the functionality of the ESA; and (c) loss of ecological connectivity (on site, and in relation to the broader landscape) due to the degradation and severing of ecological corridors or introducing barriers that impede migration and movement of flora and fauna;”

The above mapping of habitats must therefore be reconciled with the BSP mapping of the site, in particular the ESAs which are extensive. The CBAs on site have been avoided with is supported, however the Protected Area (MCA) has not been avoided.

The site ecological importance (SEI) has been calculated for the following habitats: the four vegetation types mapped for the site; the Matroosberg MCA and CBAs; and for terrestrial-aquatic ecotones. We wish to note that the SEI as described in the Species Environmental Assessment Guidelines is for the plant species and animal species themes. A draft Ecosystem Environmental Assessment Guideline has been developed but has not been approved for implementation. The SEI has however been used to inform the sensitivity map for the study area. With regards to the SEI calculations, the calculations for the MCA and CBAs is incorrect. If the conservation importance is high and the functional integrity is

very high, then the biodiversity importance is very high. If the receptor resilience is medium, then a biodiversity importance of very high will result in an SEI of very high (SANBI 2020). The other SEI calculations are correct. We wish to query the rating of high receptor resilience for renosterveld, as renosterveld is known to have a low restoration potential if disturbed (Krug 2004). We further wish to query why the biodiversity importance for South Langeberg Sandstone Fynbos is medium while the other three are high. We note that the functional integrity is considered to be medium, however the large extent of this vegetation type beyond the study area should be taken into account, not only the small percentage which encroaches into the study area. The SEI results are high for terrestrial-aquatic ecotones, medium for Matjiesfontein Shale Renosterveld and North Langeberg Sandstone Fynbos and low for South Langeberg Sandstone Fynbos and as stated above should be very high for MCA and CBA.

The SEI Map (Figure 5) does not fully correlate with the mapping of the above four ecosystems which were assessed. The high sensitivity areas are recommended as a no-go with the motivation provided of the presence of a CBA. The designation of the CBAs is fully supported, however if the SEI was used for the sensitivity mapping, both the CBA and MCA should be mapped as very high sensitivity, and the drainage lines should be high sensitivity. The major concern is the mapping of the MCA as medium sensitivity and the location of several wind turbines within the MCA. We wish to note that the calculation of MCA as very high sensitivity aligns with the CapeNature recommendation in the Scoping Phase that no turbines should be placed within the MCA. Apart from the concerns regarding the MCA, the sensitivity mapping requires further explanation in relation to the SEI calculations and the motivations if alternative features (e.g. the BSP) were used in the mapping.

The protocols state that “2.3.6. the assessment must identify any alternative development footprints within the preferred site which would be of a low sensitivity as identified by the screening tool and verified through the site sensitivity verification.” We note that only 8 of the 42 turbines are located within the low sensitivity areas of Figure 5, however it is acknowledged that sensitivities identified in other studies also need to be considered. The protocol states that “2.2. the assessment must be undertaken on the preferred site and within the proposed development footprint”, therefore it is interpreted that the footprints of the turbines need to be ground-truthed.

Fourteen potential impacts are identified and are rated as medium prior to mitigation and low after mitigation, apart from mortality due to collisions and encroachment of alien invasive species which are rated as high prior to mitigation and overgrazing impacts which is rated as low positive after mitigation. We wish to note that some of the impacts assessed are best addressed in other specialist studies undertaken such as chemical contamination and the collision risk which is assessed in the avifaunal and bat impact assessments.

In general, the terrestrial biodiversity impact assessment is flawed as described above. The habitats present on site are not adequately mapped in order to reconcile with the desktop information. The land cover mapping indicates the land uses which have resulted in transformation and disturbance to the natural habitats that would have been present. There is however no map provided indicating the habitats identified on site and the transformed areas which should be used to inform the sensitivity of

The Western Cape Nature Conservation Board trading as [CapeNature](#)

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

the site and the development layout (refer to comments regarding Figure 5). We therefore recommend that the concerns above are addressed ensure that the habitats and associated sensitivities are accurately identified and mapped and used to inform the layout before the application can be considered for authorisation. Most importantly the MCA must be mapped as very high sensitivity and all wind turbines should be removed from the MCA.

The Botanical Impact Assessment addresses the plant species theme which relates to the potential impact on plant species of conservation concern (SCCs). The methodology for the botanical impact assessment is a duplication of the terrestrial biodiversity assessment and includes the above description of habitats present. The Botanical Scoping Report indicated that belt transects would be undertaken in the EIA Phase however it is not evident that this has been undertaken. The protocols state that the Terrestrial Plant Species Specialist Assessment must be undertaken in accordance with the Species Environmental Assessment Guideline (SANBI 2020).

The list of the plant SCCs listed in the screening tool is presented however there is no indication whether any of these species occur on site or the likelihood of their occurrence or whether an attempt was made to locate any of these species. The protocol states that “2.3.1 Identify the SCC which were found, observed or are likely to occur within the study area”. 2.3.2 – 2.3.12 follow-on from the SCCs which are identified in the site assessment or are considered to be likely to occur on the site. It is however noted that a vulnerable species was recorded on site, however this took place during the fieldwork for the avifaunal assessment and no further information is provided. As this is the only confirmed SCC locality for the study area, it should form the basis of the sensitivity mapping for the plant species theme which focuses on SCCs. Similarly to the terrestrial biodiversity assessment, the footprints of the turbines should be ground-truthed. Section 10.1 of the Species Environmental Assessment Guideline provides guidelines for undertaking a plant species assessment, including the recommended fieldwork methodology.

The calculation of the SEI and the SEI map in the botanical impact assessment is a duplication of the terrestrial biodiversity assessment. The SEI is however relevant to the botanical impact assessment as it is undertaken in terms of the Species Environmental Assessment Guideline. The SEI should however reference the plant SCCs as opposed to the habitat types occurring in the study area, although the SCCs occurring in the same habitat can be grouped. The sensitivity map should be amended for the plant species impact assessment to reflect confirmed and likely occurrences of plant SCCs. The impact assessment is a duplication of the terrestrial biodiversity assessment.

In general, the botanical impact assessment is highly flawed similarly to the terrestrial biodiversity assessment and does not comply with the protocols and Species Environmental Assessment Guideline. We therefore recommend that the botanical impact assessment should also be subject to a peer review. The correct calculation of the SEI for the MCAs indicates this area is very high sensitivity and a no go for wind turbines. Apart from the MCA, the impacts on terrestrial biodiversity and plant SCCs may not be above unacceptable thresholds for the current proposed layout, however there is currently insufficient information to assess the impacts, more specifically ground-truthed information. The outcomes and recommendations are based on the desktop information.



## Animal Species Impact Assessment

The animal species impact assessment has been updated to include an assessment of impacts and has included an evaluation of *Aloeides caledoni* (Caledon copper) which was queried in the Scoping Phase. The latter species is considered unlikely to occur within the development footprint and the motivation is supported. CapeNature recommended that additional fieldwork is required in our comments in the Scoping Phase, which included camera traps at additional locations and supplementary methodologies. However, no additional fieldwork has been undertaken and the impact assessment report is based on the information presented in the Scoping Phase report.

We will not repeat our previous comments which remain relevant however we wish to highlight the need for additional sampling specifically targeting the critically endangered riverine rabbit (*Bunolagus monticularis*) which was confirmed to be present on site with regular sightings at three of nine camera traps. Drive transects were proposed for the EIA Phase however it is not apparent that this was undertaken. We recommend that the additional fieldwork as included in our comments in the Scoping Phase should be undertaken prior to commencement of construction.

Data regarding the records of species other than the three targeted SCCs have been provided as requested. A total number of 66 species were recorded, with the most frequently recorded species apart from livestock and birds consisting of hares (*Lepus sp.*), black-backed jackal (*Canis mesomelas*) and African wild cat (*Felis lybica*). Confirmation must be provided that no other SCCs were recorded on the camera traps.

The comments and response report indicates that the Endangered Wildlife Trust (EWT) will be consulted in the EIA Phase regarding riverine rabbits and incorporating appropriate mitigation and conservation measures as part of the project proposal. Mitigation measures could include stewardship and habitat restoration. Further detail is provided regarding the species including studies which confirm that the species utilizes previously degraded areas which have been restored.

The SEI was calculated for the three SCCs during the Scoping Phase with medium sensitivity for riverine rabbit and low sensitivity for leopard and grey rhebuck. The mapping from the screening tool for the riverine rabbit was used to inform the sensitivity map. The SEI is not however included in the EIA Phase report. The SEI should be used to inform the sensitivity map for the EIA phase. The sensitivity map presented in Figure 6 is based on habitat condition, with: drainage lines, alluvial fans and plains, gently undulating-to-flat natural/near-natural and recovered scrub mapped as high sensitivity; the remaining natural and near-natural habitat mapped as medium sensitivity; and the agricultural fields as low sensitivity. The drainage lines and alluvial fans are likely included as important riverine rabbit habitat. Based on the overlay of the layout of the turbines on the sensitivity map, it appears that the turbines have avoided all of the high sensitivity areas, however this needs to be provided at a higher resolution in order to accurately evaluate, particularly considering the large extent of the study area.

Several impacts have been identified throughout the life cycle of the WEF related to habitat loss, disturbance and mortality, with the impact significance prior to mitigation for all rated medium, and after mitigation either reduced to low or changed to medium positive. The medium positive impact relates to the proposal for habitat restoration within the study area. None of the impacts have a residual impact of medium or higher and therefore do not trigger the requirement for a biodiversity offset. As riverine rabbits, which is a critically endangered mammal species, were confirmed to be present on the site, the protection of suitable habitat for this species within the project area in collaboration with EWT would be strongly supported. Although in terms of the mitigation hierarchy the option of avoidance has been exercised to reduce the residual impact to below the offset threshold specifically for the proposed project, urgent action is required for the long term persistence of this species.

The mitigation measures proposed mainly relate to changes to the land practices on the affected properties and therefore requires that buy-in from a third party for the mitigation to be implemented. The impact ratings of a positive impact make several assumptions which would include landowner buy-in and extensive habitat restoration and reduction in agricultural activity. Confirmation of the landowner willingness would be required prior to submission of the Final EIA Report in order for this mitigation to be accepted. EWT could play an important role in this regard. We further note the areas proposed for restoration in the sensitivity map and wish to query the selection of these areas. It would be assumed that the areas which would be targeted for riverine rabbit would be the watercourses with an increase in the existing buffer for agricultural activities. We further wish to note that while the proposed mitigation is fully supported from a biodiversity perspective, it may be in conflict with recommendations from other sectors such as agriculture and may require further negotiation.

It is recommended that post-construction monitoring is implemented for a period of at least two years and included in the Environmental Management Programme Report. This should include as a minimum:

- Monitoring of riverine rabbit habitat condition, e.g. monitoring impacts of construction and operation, and the reduction in livestock and/or game stocking rates, on soil and vegetation.
- Monitoring to establish changes in presence, reproduction, recruitment and activity patterns of SCC, especially riverine rabbit, due to development-related disturbance.
- Monitoring the impacts of linear infrastructure, such as roadkill and erosion due to increased road traffic. Should a roadkill of a SCC occur, the circumstances must be investigated, and steps taken to prevent a reoccurrence. Riverine rabbit carcasses must be made available for genetic research.

The following additional mitigation measures are recommended:

- A reduction in the stocking rate of game and livestock will facilitate habitat recovery and habitat restoration projects. The recommended ecological stocking rates for both properties must be determined by an expert and formally agreed to by the relevant landowner(s) prior to the onset of development. This may require compensation for loss of income.
- Relocation of any fauna in the construction area must be done by a suitably qualified person, e.g. trained snake handler.

- Construction activity should not only be minimized from dusk and dawn, but also during the hour after dawn and hour before dusk. In winter especially, this is a period when many animals (including riverine rabbit) are still active.
- Minimization of lighting used to illuminate construction areas and site buildings. – recommend exploring the use of UV lights.
- The development footprint should avoid No-Go/ High Sensitivity areas completely, not “as much as possible”.

## Avifaunal Impact Assessment

An avifaunal impact assessment was included within the Scoping Phase. The Scoping Phase impact assessment has been updated with the current preferred layout with six less turbines than previously. The revised layout was factored into the collision risk model with the result of slightly lower risks for the species assessed.

With regards to the Verreaux’s Eagle (*Aquila verreauxii*) and Black Harrier (*Circus maurus*) species-specific monitoring guidelines, there were no nest recorded in the vicinity where the recommended buffer would encroach into the study area. In the absence of a species-specific guideline, a 3 km buffer has been implemented around an inactive Martial Eagle (*Polemaetus bellicosus*) nest.

The collision risk model is only being used for the second time for this facility and the adjacent Khoe WEF. Use of collision risk modelling could potentially be a significant step forward in designing WEFs to minimize the impact of bird collisions due to a higher confidence in the prediction in collision risk. Post-construction monitoring is therefore essential in assessing the accuracy of the predictions and hence future adoption of the model within the industry.

The impact assessment rates the impact of displacement as medium both before and after mitigation and the impact of collisions as medium-high prior to mitigation and medium-low after mitigation. The residual impact of medium is within the threshold which requires a biodiversity offset according to the National Biodiversity Offset Guidelines i.e. medium or higher. We do however wish to query if the values associated with the impact categories (low to high) use the same scale and if so whether the impact after mitigation for collisions should be medium-low or low when compared to other impacts. All proposed mitigation measures are supported and must be implemented.

The recommendation with regards to the residual impacts is that the post-construction monitoring will be able to determine the actual impacts and allow the opportunity to evaluate if additional mitigation measures, which could take the form of a species offset. We wish to note that a pilot species offset is currently being investigated for impacts from a WEF on a bird species and can be used as a precedent if required. We therefore recommend that after two years of post-construction monitoring, an evaluation is undertaken whether a species offset or other additional mitigation is required, with the option of extending the evaluation period by another two years. We recommend that this should be included as a condition of approval.

## **Bat Impact Assessment**

The bat scoping study presented the preliminary results from the bat monitoring and indicated that recommendations would be provided once at least a full of monitoring is complete. The monitoring results are from December 2022 – March 2024. In general, bat activity is considered to be high on site with five species recorded and one species accounting for approximately half of the records (*Tadarida aegyptiaca* – Egyptian free-tailed bat).

Four masts scattered throughout the study area were used for the monitoring with the microphones at 10 m and also at 50 m and 100m for the one mast. A sensitivity map was developed and used as an informant to the development layout. The sensitivity is based on the buffer zones in the bat monitoring guidelines. The buffers are placed around features which are likely to support bat habitat e.g. water bodies, dwellings. No turbines are located within the areas mapped as medium-high or high sensitivity, however the map should be provided at a finer scale to allow for accurate interrogation to confirm this. The remainder of the site is medium sensitivity.

A number of impacts are identified, most of which are of medium significance before mitigation and low significance after mitigation. The exceptions are the impact of barotrauma and collision mortality which is rated high significance both before and after mitigation and the impact of the loss of foraging space which is rated high significance before mitigation and medium significance after mitigation. The residual impact for both of these impacts exceeds the threshold for biodiversity offsets. The overall impact on bats is however rated as medium before mitigation and low after mitigation.

A number of mitigation measures are proposed all of which are supported and must be implemented. Note that roof sealing should include the installation of one-way valves to allow an escape route for any bats trapped inside buildings. Mention is made of the potential use of bat deterrents, although their efficacy in South Africa is unknown. A recommendation could be to experimentally trial a deterrent on one or both sites. The description of the residual impacts per impact appears to address the residual impact after the WEF is decommissioned and therefore does not refer to the residual impact after following the mitigation hierarchy. Our recommendation is therefore that post-construction monitoring must be undertaken, and the impacts should be reviewed after a two year period to assess whether offsets of other additional mitigation measures are required, as was recommended for the avifaunal impact assessment.

## **Aquatic Impact Assessment**

An aquatic impact assessment was compiled for the Scoping Phase. The contents were broadly supported, and no major concerns were identified. The assessment recommended buffer zones for each of the aquatic features which were calculated using the buffer zone tool and can be considered relatively conservative. The buffer zones were used to inform the layout. The aquatic impact assessment has been updated for the EIA Phase with only minimal changes and therefore our previous comments remain relevant. Several impacts were identified all of which are rated as medium significance prior to mitigation and low significance after mitigation. The addendum assesses the current proposed layout with no changes to the assessment. The mapping of the sensitive aquatic

features broadly aligns with the mapping of the sensitive faunal features where this constitutes suitable riverine rabbit habitat.

The aquatic impact assessment further indicates that the proposed WEF will not impact on the broader catchment as run-off will not be significantly affected. This is likely based on the overall ratio of the turbine and infrastructure footprints to the remaining vegetated areas. The motivation therefore supports that the catchment function of the Matroosberg MCA would not be significantly affected by the proposed development. The sensitivity assessment for the terrestrial biodiversity assessment however still remains relevant.

## **Development Layout**

The informants to the development layout were queried during the Scoping Phase. An appendix has been provided indicating the iterations in the development of the current proposed layout and the informants which were used. The current preferred layout is the third iteration, with the description indicating the first revision is based on technical considerations, the second iteration included the bird, bat, aquatic biodiversity and terrestrial biodiversity no-go areas and the final iteration addressed the high visual impact sensitivities. It would however appear that the first iteration took into consideration sensitivities as a section of the central part of the study area is devoid of turbines (possibly bird and bat monitoring). Only four turbines which were removed in the final iteration are listed and should also include turbines 29 and 41. It is noted that the comments and response table indicates that the wind turbines will be shifted out of the MCA however this has not been implemented.

While the description of the iterations used in the development of the layout provides clarity in terms of the investigation of alternatives and selection of the best practicable alternative from an environmental perspective, further confirmation is required that the preferred alternative has taken into account all the variables. We therefore recommend that a comparative table is provided for each of the specialist studies undertaken evaluating the proposed layout in relation to the identified sensitivities (and taking into account concerns raised about sensitivity mapping). In this regard we wish to note that recommendations can be grouped into preferred, not preferred but acceptable and not acceptable/no-go e.g. from a terrestrial biodiversity perspective, location on the cultivated lands may be preferred, however location within least concern indigenous vegetation mapped as ESA and micro-sited on to a disturbance footprint may not be preferred but is acceptable.

## **Conclusion**

In conclusion, CapeNature recommends that the following concerns must be addressed prior to submission of the Final EIA Report:

- The calculations of the SEI for the terrestrial biodiversity assessment must be amended in accordance with the Species Environmental Assessment Guideline and accordingly, CBA and MCA should be assigned an SEI of very high as opposed to medium. The recommendation for very high SEI should be as for the high SEI which is a no-go for development and therefore the

wind turbines located within the MCA must be removed. We recommend that the current layout should not be authorised, or alternatively only the wind turbines outside of the MCA should be considered for authorisation. The inputs in aquatic biodiversity impact assessment regarding the impact on the catchment should however also be noted.

- The terrestrial biodiversity impact assessment and plant species impact assessment should be subjected to a peer review to ensure that accurate ground-truthed descriptions and mapping of the habitats and SCCs present and associated sensitivity is provided. The footprints of the turbines and associated infrastructure should be ground-truthed.
- Additional pre-construction monitoring is required for the animal species impact assessment in order to provide more accurate data to inform the assessment.
- Post-construction monitoring must take place for the mammal SCCs, avifauna and bats according to the required/appropriate methodology. A re-evaluation of the residual impacts must be undertaken after two years of post-construction monitoring and a determination made whether biodiversity offsets or other additional mitigation measures are required. Provision should be made for a further extension of post-construction monitoring.
- Once the sensitivity mapping for the terrestrial biodiversity, plant species and animal species has been amended in accordance with the comments above, a matrix with inputs from all specialist studies should be provided confirming that the current preferred layout is the overall preferred layout or whether further amendments to the layout are required.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards



Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Marienne de Villiers, CapeNature

Adri Le Meyer, Department of Environmental Affairs and Development Planning

References:

Helme, N. & Rebelo, T. 2016. Chapter 5: Ecosystem Guidelines, Renosterveld Ecosystems incorporating Coast and Inland Renosterveld. In: Cadman M., editor. *Ecosystem Guidelines for Environmental Assessment in the Western Cape*. 2nd Edition. Fynbos Forum, Cape Town.

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**From:** [REDACTED]  
**To:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Draft EIA Report: Khoe Wind Energy Facility  
**Date:** Monday, 30 September 2024 08:57:14  
**Attachments:** [image001.png](#)  
[Khoe\\_WEF\\_Koo\\_Valley\\_20240927.pdf](#)

**EXTERNAL MESSAGE**

Dear Sadiya

Please can replace the previous comment with the signed copy of the comment as attached.

Regards

Rhett

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**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Friday, September 27, 2024 1:58 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Draft EIA Report: Khoe Wind Energy Facility

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Hi Rhett,

Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, September 27, 2024 1:43 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]

**Subject:** Draft EIA Report: Khoe Wind Energy Facility

**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality.

Regards

Rhett

**Rhett Smart**  
Land Use Scientist | South Landscape



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**reference** LS14/2/6/1/9/1/Khoe\_WEF\_Koo Valley  
**date** 27 September 2024

Environmental Resources Management Southern Africa  
1st Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
Cape Town,  
7700

Attention: Sadiya Salie  
By email: [hugokhoe@erm.com](mailto:hugokhoe@erm.com)

Dear Ms Salie

**Draft Environmental Impact Assessment Report for the Proposed Khoe Wind Energy Facility, Koo Valley, Langeberg Municipality (DFFE ref. no.: 14/12/16/3/3/2/2516)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

**Terrestrial Biodiversity Impact Assessment and Botanical Impact Assessment**

The Western Cape Biodiversity Spatial Plan (BSP) should be the primary desktop informant for the terrestrial biodiversity impact assessment, of which the mapping is accurately reflected in Figure 3 of the terrestrial biodiversity impact assessment. Ecological Support Area 1 and 2 (ESA) covers a large percentage of the study area and the objectives as described in the BSP Guidelines are accurately reflected. The three vegetation types occurring in the study area as mapped in the National Vegetation Map are also included. The wind turbines are mostly located within the ESA on the site, however very few are located within the areas mapped as No Natural where natural habitat will not be impacted.

The methodology is described and references the protocols. While the desktop study is comprehensive and accurately reflected, the site verification is described as accompanying the faunal specialist to verify the screening tool results with two site visits in March and June. The protocol

requires “3.1.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment”. Neither of the site visits would have been within the optimal time of year in the winter rainfall region when species that are dormant the rest of the year would not be visible e.g. spring flowering annuals and geophytes. The Ecosystem Guidelines for Environmental Assessment state that for renosterveld “Undertake environmental assessments in spring (when the bulk of the annuals and bulbs are flowering), and in veld that is between 4 and 12 years old” (Helme & Rebelo 2016). The methodology of the fieldwork is not described in any further detail with regards to the areas which were assessed and whether any quantitative sampling was undertaken.

Seven vegetation surveys were conducted within the areas mapped as Matjiesfontein Shale Renosterveld and one within the North Langeberg Sandstone Fynbos and four habitats were identified namely Matjiesfontein Shale Renosterveld riparian habitat, Matjiesfontein Shale Renosterveld low shrubland, Matjiesfontein Shale Renosterveld drainage area and North Langeberg Sandstone Fynbos rocky outcrops. A few species are mentioned for each of these habitats and in this regard, we wish to query the vegetation classification. *Protea repens* is listed as a dominant species within the Matjiesfontein Shale Renosterveld low shrubland, however this species is a common species typical of fynbos. One of the key diagnostic features in separating fynbos and renosterveld is the absence of Proteaceae, Ericaceae and Restionaceae in the latter (Mucina & Rutherford 2006). This habitat is described occurring in the south west of the site, however this is where North Langeberg Sandstone Fynbos and South Langeberg Sandstone Fynbos are mapped. The dominant species occurring within North Langeberg Sandstone Fynbos rocky outcrops are listed as renosterbos (*Dicerothamnus rhinocerotis*) and *Oedera genistifolia* which are typical of renosterveld. Therefore, clarification is required regarding the location of the 7 surveys and the accurate mapping of the vegetation types.

The protocols state that “the assessment must be based on the results of a site inspection undertaken on the preferred site and must identify: 2.3.7.2. terrestrial ecological support areas (ESAs), including: (a) the impact on the ecological processes that operate within or across the site; (b) the extent the proposed development will impact on the functionality of the ESA; and (c) loss of ecological connectivity (on site, and in relation to the broader landscape) due to the degradation and severing of ecological corridors or introducing barriers that impede migration and movement of flora and fauna;”

The above mapping of habitats must therefore be reconciled with the BSP mapping of the site, in particular the ESAs which are extensive. The extent of Critical Biodiversity Areas (CBAs) on site is negligible, but should nevertheless be avoided.

The site ecological importance (SEI) has been calculated for the three vegetation types mapped for the site and for terrestrial-aquatic ecotones. We wish to note that the SEI as described in the Species Environmental Assessment Guidelines is for the plant species and animal species themes. A draft Ecosystem Environmental Assessment Guideline has been developed but has not been approved for implementation. The SEI has however been used to inform the sensitivity map for the study area. With regards to the SEI calculations, we wish to query the rating of high receptor resilience for renosterveld, as renosterveld is known to have a low restoration potential if disturbed (Krug 2004). We further wish to query why the biodiversity importance for South Langeberg Sandstone Fynbos is medium while the other three are high. The SEI results are high for terrestrial-aquatic ecotones,

medium for Matjiesfontein Shale Renosterveld and North Langeberg Sandstone Fynbos and low for South Langeberg Sandstone Fynbos.

The SEI Map (Figure 5) does not correlate with the mapping of the above four ecosystems which were assessed. The high sensitivity areas are recommended as a no-go with the motivation provided of the presence of a highly sensitive floral species. The sensitivity map for the terrestrial biodiversity impact assessment is therefore actually the sensitivity map for the plant species theme. The sensitivity map reflecting the habitats identified and associated sensitivities should therefore be provided as the sensitivity map for the terrestrial biodiversity theme.

The protocols state that “2.3.6. the assessment must identify any alternative development footprints within the preferred site which would be of a low sensitivity as identified by the screening tool and verified through the site sensitivity verification.” We note that only 6 of the 29 turbines are located within the low sensitivity areas of Figure 5, however it is acknowledged that sensitivities identified in other studies also need to be considered. The protocol states that “2.2. the assessment must be undertaken on the preferred site and within the proposed development footprint”, therefore it is interpreted that the footprints of the turbines need to be ground-truthed.

Thirteen potential impacts are identified and are rated as medium prior to mitigation and low after mitigation, apart from mortality due to collisions and encroachment of alien invasive species which are rated as high prior to mitigation. We wish to note that some of the impacts assessed are best addressed in other specialist studies undertaken such as chemical contamination and the collision risk which is assessed in the avifaunal and bat impact assessments.

In general, the terrestrial biodiversity impact assessment is significantly flawed as described above. The habitats present on site are not accurately described and mapped in order to reconcile with the desktop information. The land cover mapping indicates the land uses which have resulted in transformation and disturbance to the natural habitats that would have been present. There is however no map provided indicating the habitats identified on site and the transformed areas which should be used to inform the sensitivity of the site and the development layout (refer to comments regarding Figure 5). We therefore recommend that a peer review is undertaken of the terrestrial biodiversity impact assessment to ensure that the habitats and associated sensitivities are accurately identified and mapped.

The Botanical Impact Assessment addresses the plant species theme which relates to the potential impact on plant species of conservation concern (SCCs). The methodology for the botanical impact assessment is a duplication of the terrestrial biodiversity assessment and includes the above description of habitats present. The Botanical Scoping Report indicated that belt transects would be undertaken in the EIA Phase however it is not evident that this has been undertaken. The protocols state that the Terrestrial Plant Species Specialist Assessment must be undertaken in accordance with the Species Environmental Assessment Guideline (SANBI 2020).

The list of the plant SCCs listed in the screening tool is presented however there is no indication whether any of these species occur on site or the likelihood of their occurrence or whether an attempt was made to locate any of these species. The protocol states that “2.3.1 Identify the SCC which were found, observed or are likely to occur within the study area”. 2.3.2 – 2.3.12 follow-on from the SCCs which are identified in the site assessment or are considered to be likely to occur on the site. Similarly to the terrestrial biodiversity assessment, the footprints of the turbines should be ground-truthed. Section 10.1 of the Species Environmental Assessment Guideline provides guidelines for undertaking a plant species assessment, including the recommended fieldwork methodology.

The calculation of the SEI and the SEI map in the botanical impact assessment is a duplication of the terrestrial biodiversity assessment. The SEI is however relevant to the botanical impact assessment as it is undertaken in terms of the Species Environmental Assessment Guideline. The SEI should however reference the plant SCCs as opposed to the habitat types occurring in the study area, although the SCCs occurring in the same habitat can be grouped. The SEI map is more relevant to the botanical impact assessment as previously mentioned. The map appears to be based on the screening tool map and the high sensitivity attributed to two species, one of which cannot be named in a public report and is listed as sensitive species 207. The impact assessment is a duplication of the terrestrial biodiversity assessment.

In general, the botanical impact assessment is highly flawed similarly to the terrestrial biodiversity assessment and does not comply with the protocols and Species Environmental Assessment Guideline. We therefore recommend that the botanical impact assessment should also be subject to a peer review. The impacts on terrestrial biodiversity and plant SCCs may not be above unacceptable thresholds, however there is currently insufficient information to assess the impacts and proposed layout, more specifically ground-truthed information. The outcomes and recommendations are based on the desktop information.

## **Animal Species Impact Assessment**

The animal species impact assessment has been updated to include an assessment of impacts and has included an evaluation of *Aloeides caledoni* (Caledon copper) which was queried in the Scoping Phase. The latter species is considered unlikely to occur within the development footprint and the motivation is supported. CapeNature recommended that additional fieldwork is required in our comments in the Scoping Phase, which included camera traps at additional locations and supplementary methodologies. However, no additional fieldwork has been undertaken and the impact assessment report is based on the information presented in the Scoping Phase report. We will not repeat our previous comments which remain relevant and included the reference to only two camera trap localities which are not fully representative of the habitats over the large study area. Drive transects were proposed for the EIA Phase however it is not apparent that this was undertaken. We recommend that the additional fieldwork as included in our comments in the Scoping Phase should be undertaken prior to commencement of construction. We wish to note that the comments and response report has mixed up the responses regarding the adjacent proposed Hugo Wind Energy Facility where there were confirmed sightings of riverine rabbit (*Bunolagus monticularis*).

Data regarding the records of species other than the three targeted SCCs have been provided as requested. A total number of 66 species were recorded, with the most frequently recorded species apart from livestock and birds consisting of hares (*Lepus sp.*), black-backed jackal (*Canis mesomelas*) and African wild cat (*Felis lybica*). Confirmation must be provided that no other SCCs were recorded on the camera traps.

The comments and response report indicates that the Endangered Wildlife Trust (EWT) will be consulted in the EIA Phase regarding riverine rabbits and incorporating appropriate mitigation and conservation measures as part of the project proposal. Mitigation measures could include stewardship and habitat restoration. Further detail is provided regarding the species including studies which confirm that the species utilizes previously degraded areas which have been restored.

The SEI was calculated for the three SCCs during the Scoping Phase with medium sensitivity for riverine rabbit and low sensitivity for leopard and grey rhebuck. The mapping from the screening tool for the riverine rabbit was used to inform the sensitivity map. The SEI is not however included in the EIA Phase report. The SEI should be used to inform the sensitivity map for the EIA phase and should be based on the mapping of suitable habitat for the SCCs. Riverine rabbits have fairly specific habitat requirements associated with watercourses and suitable habitat should be mapped. The sensitivity map presented in Figure 6 is based on habitat condition, with the natural and near-natural habitat mapped as medium sensitivity and the agricultural fields as low sensitivity. There is a similarity with the sensitivity map for the terrestrial biodiversity and botanical impact assessments but not a full match. Additional explanation is required regarding the sensitivity map in relation to the SEI for the three SCCs and the habitats utilized by these species.

Several impacts have been identified throughout the life cycle of the WEF related to habitat loss, disturbance and mortality, with the impact significance prior to mitigation for all rated medium, and after mitigation either reduced to low or changed to medium positive. The medium positive impact relates to the proposal for habitat restoration within the study area. None of the impacts have a residual impact of medium or higher and therefore do not trigger the requirement for a biodiversity offset. Although riverine rabbits were not confirmed to be present on the site, the confirmed presence on nearby properties could motivate for the protection of suitable habitat for this species within the study area in collaboration with EWT.

The mitigation measures proposed mainly relate to changes to the land practices on the affected properties and therefore requires that buy-in from a third party for the mitigation to be implemented. The impact ratings of a positive impact make several assumptions which would include landowner buy-in and extensive habitat restoration and reduction in agricultural activity. Confirmation of the landowner willingness would be required prior to submission of the Final EIA Report in order for this mitigation to be accepted. EWT could play an important role in this regard. We further note the areas proposed for restoration in the sensitivity map and wish to query the selection of these areas. It would be assumed that the areas which would be targeted for riverine rabbit would be the watercourses with an increase in the existing buffer for agricultural activities. We further wish to note that while the proposed mitigation is fully supported from a biodiversity perspective, it may be in

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conflict with recommendations from other sectors such as agriculture and may require further negotiation.

It is recommended that post-construction monitoring is implemented for a period of at least two years and included in the Environmental Management Programme Report. This should include as a minimum:

- Monitoring of riverine rabbit habitat condition, e.g. monitoring impacts of construction and operation, and the reduction in livestock and/or game stocking rates, on soil and vegetation.
- Monitoring to establish changes in presence, reproduction, recruitment and activity patterns of SCC, especially riverine rabbit, due to development-related disturbance.
- Monitoring the impacts of linear infrastructure, such as roadkill and erosion due to increased road traffic. Should a roadkill of a SCC occur, the circumstances must be investigated, and steps taken to prevent a reoccurrence. Riverine rabbit carcasses must be made available for genetic research.

The following additional mitigation measures are recommended:

- A reduction in the stocking rate of game and livestock will facilitate habitat recovery and habitat restoration projects. The recommended ecological stocking rates for both properties must be determined by an expert and formally agreed to by the relevant landowner(s) prior to the onset of development. This may require compensation for loss of income.
- Relocation of any fauna in the construction area must be done by a suitably qualified person, e.g. trained snake handler.
- Construction activity should not only be minimized from dusk and dawn, but also during the hour after dawn and hour before dusk. In winter especially, this is a period when many animals (including riverine rabbit) are still active.
- Minimization of lighting used to illuminate construction areas and site buildings. – recommend exploring the use of UV lights.
- The development footprint should avoid No-Go/ High Sensitivity areas completely, not “as much as possible”.

## **Avifaunal Impact Assessment**

An avifaunal impact assessment was included within the Scoping Phase. The Scoping Phase impact assessment has been updated with the current preferred layout with two less turbines than previously. The revised layout was factored into the collision risk model with the result of slightly lower risks for the species assessed.

CapeNature had queried the implementation of the buffers from nests for Black Harriers and Verreaux’s Eagles in accordance with the species-specific monitoring guidelines. There were turbines located within the recommended 3.7 km buffer from a Verreaux’s Eagle nest, however it was recommended to rather use the modelled flights of the collision risk model than the generic radius around the nest as this is considered as a more accurate reflection of the flight paths. The motivation is accepted.

The collision risk model is only being used for the second time for this facility and the adjacent Hugo WEF. Use of collision risk modelling could potentially be a significant step forward in designing WEFs to minimize the impact of bird collisions due to a higher confidence in the prediction in collision risk. Post-construction monitoring is therefore essential in assessing the accuracy of the predictions and hence future adoption of the model within the industry.

The impact assessment rates the impact of displacement as medium both before and after mitigation and the impact of collisions as medium-high prior to mitigation and medium after mitigation. The residual impact is within the threshold which requires a biodiversity offset according to the National Biodiversity Offset Guidelines i.e. medium or higher. All proposed mitigation measures are supported and must be implemented. The recommendation with regards to the residual impacts is that the post-construction monitoring will be able to determine the actual impacts and allow the opportunity to evaluate if additional mitigation measures, which could take the form of a species offset. We wish to note that a pilot species offset is currently being investigated for impacts from a WEF on a bird species and can be used as a precedent if required. We therefore recommend that after two years of post-construction monitoring, an evaluation is undertaken whether a species offset or other additional mitigation is required, with the option of extending the evaluation period by another two years. We recommend that this should be included as a condition of approval.

## **Bat Impact Assessment**

The bat scoping study presented the preliminary results from the bat monitoring and indicated that recommendations would be provided once at least a full of monitoring is complete. The monitoring results are from December 2022 – March 2024. In general, bat activity is considered to be high on site with five species recorded and one species accounting for more than half of the records (*Laephotis capensis* – Cape roof bat).

Four masts scattered throughout the study area were used for the monitoring with the microphones at 10 m and also at 50 m and 100m for the one mast. A sensitivity map was developed and used as an informant to the development layout. The sensitivity is based on the buffer zones in the bat monitoring guidelines. The buffers are placed around features which are likely to support bat habitat e.g. water bodies, dwellings. No turbines are located within the areas mapped as medium-high or high sensitivity. The remainder of the site is medium sensitivity.

A number of impacts are identified, most of which are of medium significance before mitigation and low significance after mitigation. The exceptions are the impact of barotrauma and collision mortality which is rated high significance both before and after mitigation and the impact of the loss of foraging space which is rated high significance before mitigation and medium significance after mitigation. The residual impact for both of these impacts exceeds the threshold for biodiversity offsets. The overall impact on bats is however rated as medium before mitigation and low after mitigation.

A number of mitigation measures are proposed all of which are supported and must be implemented. Note that roof sealing should include the installation of one-way valves to allow an escape route for

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any bats trapped inside buildings. Mention is made of the potential use of bat deterrents, although their efficacy in South Africa is unknown. A recommendation could be to experimentally trial a deterrent on one or both sites. The description of the residual impacts per impact appears to address the residual impact after the VEF is decommissioned and therefore does not refer to the residual impact after following the mitigation hierarchy. Our recommendation is therefore that post-construction monitoring must be undertaken, and the impacts should be reviewed after a two year period to assess whether offsets of other additional mitigation measures are required, as was recommended for the avifaunal impact assessment.

## **Aquatic Impact Assessment**

An aquatic impact assessment was compiled for the Scoping Phase. The contents were broadly supported, and no major concerns were identified. The assessment recommended buffer zones for each of the aquatic features which were calculated using the buffer zone tool and can be considered relatively conservative. The buffer zones were used to inform the layout. The aquatic impact assessment has been updated for the EIA Phase with only minimal changes and therefore our previous comments remain relevant. Several impacts were identified all of which are rated as medium significance prior to mitigation and low significance after mitigation. The addendum assesses the current proposed layout with no changes to the assessment.

We wish to query why the delineation of the aquatic features and associated buffer zones were not used in the animal species impact assessment in determining the suitable habitat for riverine rabbits and hence the animal species sensitivity map.

## **Development Layout**

The informants to the development layout were queried during the Scoping Phase. An appendix has been provided indicating the iterations in the development of the current proposed layout and the informants which were used. The current preferred layout is the third iteration, with the description indicating the first revision is based on technical considerations, the second iteration included the bird, bat, aquatic biodiversity and terrestrial biodiversity no-go areas and the final iteration addressed the high visual impact sensitivities. It would however appear that the first iteration took into consideration sensitivities as a large proportion of the central/eastern part of the study area is devoid of turbines (possibly agricultural potential and/or bird and bat monitoring). We wish to query the terrestrial biodiversity constraints that were used as the only high sensitivity area identified is based on the modelled distribution of a plant species in the screening tool which needs to be ground-truthed.

While the description of the iterations used in the development of the layout provides clarity in terms of the investigation of alternatives and selection of the best practicable alternative from an environmental perspective, further confirmation is required that the preferred alternative has taken into account all the variables. We therefore recommend that a comparative table is provided for each of the specialist studies undertaken evaluating the proposed layout in relation to the identified sensitivities (and taking into account concerns raised about sensitivity mapping). In this regard we wish to note that recommendations can be grouped into preferred, not preferred but acceptable and not acceptable/no-go e.g. from a terrestrial biodiversity perspective, location on the cultivated lands may



be preferred, however location within least concern indigenous vegetation mapped as ESA and micro-sited on to a disturbance footprint may not be preferred but is acceptable.

## Conclusion

In conclusion, CapeNature recommends that the following concerns must be addressed prior to submission of the Final EIA Report:

- The terrestrial biodiversity impact assessment and plant species impact assessment should be subjected to a peer review to ensure that accurate ground-truthed descriptions and mapping of the habitats and SCCs present and associated sensitivity is provided. The footprints of the turbines and associated infrastructure should be ground-truthed.
- Additional pre-construction monitoring is required for the animal species impact assessment in order to provide more accurate data to inform the assessment.
- Post-construction monitoring must take place for the mammal SCCs, avifauna and bats according to the required/appropriate methodology. A re-evaluation of the residual impacts must be undertaken after two years of post-construction monitoring and a determination made whether biodiversity offsets or other additional mitigation measures are required. Provision should be made for a further extension of post-construction monitoring.
- Once the sensitivity mapping for the terrestrial biodiversity, plant species and animal species has been amended in accordance with the comments above, a matrix with inputs from all specialist studies should be provided confirming that the current preferred layout is the overall preferred layout or whether further amendments to the layout are required.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards



Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Marianne de Villiers, CapeNature

Adri Le Meyer, Department of Environmental Affairs and Development Planning

### References:

Helme, N. & Rebelo, T. 2016. Chapter 5: Ecosystem Guidelines, Renosterveld Ecosystems incorporating Coast and Inland Renosterveld. In: Cadman M., editor. *Ecosystem Guidelines for Environmental Assessment in the Western Cape*. 2nd Edition. Fynbos Forum, Cape Town.

Krug, C.B. (2004): *Practical Guidelines for the Restoration of Renosterveld*. University of Stellenbosch. Stellenbosch

Mucina L. & Rutherford M.C. (eds.): *The Vegetation of South Africa, Lesotho and Swaziland*; Strelitzia 19, South African National Biodiversity Institute, Pretoria, 2006, 807 pp. Price USD 60.-, ISBN-13: 978-1 919976-21-1, ISBN-10: 1-919976-21-3

South African National Biodiversity Institute (SANBI). 2020. *Species Environmental Assessment Guideline. Guidelines for the Implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for Environmental Impact Assessments in South Africa*. South African National Biodiversity Institute, Pretoria. Version 3.1. 2022.

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 30 September 2024 09:23:55  
**Attachments:** [image001.png](#)

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Dear Elkerine,

Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE for consideration.

Kind Regards



**ERM**

Sustainability is our business

**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Good day,  
Please find attached comment as requested.  
Kind regards  
Elkerine

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](#)>  
**Sent:** Friday, 13 September 2024 14:08  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](#)>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
+27 21 681 5400  
+27 60 739 6993

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Tuesday, August 27, 2024 10:09 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town



**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 30 September 2024 09:23:50  
**Attachments:** [image001.png](#)

---

Dear Elkerine,

Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE for consideration.

Kind Regards



**ERM**

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](#)  
Cape Town  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, September 27, 2024 3:32 PM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [REDACTED]  
[REDACTED]  
>  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**EXTERNAL MESSAGE**

Good day,  
Please find attached comment as requested.  
Kind regards  
Elkerine

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](#)>  
**Sent:** Friday, 13 September 2024 14:08  
**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](#)>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

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Thank you,

Kind Regards



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**Sadiya Salie**

Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Tuesday, August 27, 2024 10:09 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011).

The reports will be available for a 30-day comment period from 23 August 2024 – 23 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report.

More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Thank you and regards,



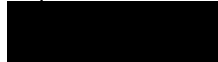
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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town





**From:** [Sadiya Salie](#)  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: Draft EIA Report: Hugo Wind Energy Facility, De Doorns  
**Date:** Monday, 30 September 2024 12:40:37  
**Attachments:** [image003.png](#)

---

Hi Rhett,

Please note that commenting period has passed. Comments will not be considered in the final EIA Report, however they will be sent to DFFE.

Kind Regards



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[Redacted]

---

**From:** [Redacted]  
**Sent:** Monday, September 30, 2024 8:52 AM  
**To:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Cc:** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Subject:** Draft EIA Report: Hugo Wind Energy Facility, De Doorns  
**Importance:** High

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**EXTERNAL MESSAGE**

Dear Sadiya

Please find attached comment from CapeNature on the Draft Environmental Impact Assessment Report for the Proposed Hugo Wind Energy Facility, De Doorns, Breede Valley Municipality.

Regards

Rhett

Rhett Smart  
Land Use Scientist | South Landscape



[REDACTED]  
[REDACTED] | postal 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200  
physical 16 17<sup>th</sup> Avenue, Voelklip, Hermanus, 7200  
[www.capenature.co.za](http://www.capenature.co.za)

---

From: [Redacted] <[Redacted]>  
To: [Redacted]  
Subject: RE: New Response for "Stakeholder Engagement"  
Date: Monday, 11 September 2023 14:54

Hi Rob,

I've sent the below response.

Sallya Sida  
Consultant ERM Ltd Floor, 248 Main Road Bunkershead, Great Westfield, Cape Town

From: ERM (Thys & Khoo) Wind Energy Facilities <[Redacted]>  
Sent: Monday, September 22, 2023 11:17 AM  
To: [Redacted] <[Redacted]>  
Subject: New Response for "Stakeholder Engagement"

Hi John and Karen,

Thank you for providing your comments.

The main surveys (two sites) were conducted by BBU over a 12-month period in 2022-2023. Among the Red Data (RD) species, 1014 flights were recorded in 405 hours in the WEF giving a high Passage Rate of 2.18 RD species per hour; these were dominated by Blue Crane and Verran's Eagle (75% of all flights) and Verran's Eagle (75% of all flights) and Verran's Eagle (75% of all flights) and Verran's Eagle (75% of all flights) were the most commonly recorded and the overall Passage Rate was 8.21 flights per hour.

Adequate flight data was collected from areas (7 RD and 2 LC) of 16 species not undertaken the CEM analysis. The CEM assessment weighted Endangered RD species higher than Vulnerable species and all RD species were ranked higher than LC species. It also assessed for the seven Priority species' collision propensity, as well as habitat variables and topography, to produce a high resolution spatially explicit risk map giving eight levels of risk for the entire area.

The highest risk areas (Class 1 and above) were strongly clustered in the eastern and northern sections, the mainly high flight zones of Blue Crane and Verran's Eagle. The risky threshold areas (Class 1-3) encompassed more than 77% of risky flight for two species (Verran's Eagle and Black Hartree), and 50% of each flight for six of the seven species. The areas are classified as too risky for development and allocated as No-Go areas.

These high-risk areas covered 47% of the area, leaving 53% of the area classified as medium- or low-risk to the Priority birds recorded, mainly in the south-west of the study site. Turbines in areas classified as risk Class 4-5 require one-tier of mitigation: either patterned-bodies or show-down-on-demand (SDOD) - automated, or human-led. Those in Class 4-5 require no extra mitigation. Should one Critically Endangered or Endangered bird be killed per year or any turbine then an additional tier of mitigation must be applied. For Other Red data species, the threshold requiring mitigation is 1 to 2 fatalities depending on the species.

Since the application has optimised that turbines layout to avoid all high-risk areas and find to minimise turbines in medium-risk areas as presented here, then fatalities of all Priority species are expected to drop to < 1 bird/year for Black Hartree (BH), Blue Crane (BC), and Verran's Eagle (VE), and < 0.5 bird/year for Verran's Eagle (VE), Jackal Throated (JT) and Bristled Eagle (BE). That is less than one fatality every 10 years (BH, BC and JT) to less than one every 2.5 years (VE, BE and BE).

Thus, by avoiding the risk areas mapped in the spatially explicit model and siting-touring of turbines well away from high-risk areas, fatality estimates can be reduced from an initial between 18-644 (Blue Crane) and 614-614 (Black Hartree) to 614 and 614-614 for Verran's Eagle, respectively. This the developer has undertaken and thereby reduced the predicted fatalities substantially.

None the presence of a precautionary buffer for a Martial Eagle not developed during field work just outside the north-eastern boundary. Had this not been active, a buffer of 5.7 km would have been required (D'Arcy, FW, 2017). However, observations throughout the year, and the CEM outputs, both indicate little activity. Therefore the buffer has been reduced to a precautionary 3 km, and the possibility that it becomes active in future years. This buffer also encompasses a sighting of an adult and young Black Hartree, but for which no use could be confirmed.

Kind Regards,  
Sallya Sida  
[Redacted] Floor, 248 Main Road Bunkershead, Great Westfield, Cape Town 7500

From: [Redacted]  
Sent: Monday, September 22, 2024 12:29 PM  
To: ERM (Thys & Khoo) Wind Energy Facilities <[Redacted]>  
Subject: New Response for "Stakeholder Engagement"

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EXTERNAL MESSAGE

Dear Adair/John and Karen,

Your form "Stakeholder Engagement" has a new response.

1. What's your name?  
John and Karen Kringsberger

2. Who do you represent?  
Eximia Nature Reserve - Owners

3. What's your phone number?  
[Redacted]

4. What's your email address?  
[Redacted]

5. What's your address?  
[Redacted]

6. What's your business name?  
[Redacted]

7. What's your business address?  
[Redacted]

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[Redacted]

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[Redacted]

**From:** [ERM Hugo & Khoe Wind Energy Facilities](#)  
**To:** [REDACTED]  
**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province  
**Date:** Monday, 30 September 2024 12:47:31  
**Attachments:** [image001.png](#)

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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town  
[REDACTED]

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <HugoKhoe@erm.com>  
**Sent:** Wednesday, September 25, 2024 11:52 AM  
**To:** [REDACTED]  
**Subject:** RE: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Hi Stefan,

Thank you for providing us with your comments.

In response to the concerns you have raised, the Final EIA extensively assessed all the aspects, along with mitigation measures that would need to be implemented in order to reduce impacts.

### **Biodiversity and Endangered Species**

Given the extensive modelling of risk by the CRM, based on a data set collected in a high species-richness and abundance year, resulting in the re-location of all turbines outside the high-risk areas by the client, the likelihood that fatalities will occur is low. For turbines proposed in medium-risk areas (i.e. in risk areas of Class 4.5), mitigation measures will be implemented.

The negative impacts to Riverine Rabbit and Grey Rhebok are not anticipated to exceed acceptable levels. Mitigation measures provided in the Animal Species Specialist Report are likely to have a net-positive impact on these species through the improvement of habitat connectivity and reduced overgrazing.

### **Impact on Visual Landscape and Scenic Integrity**

We acknowledge the impacts from a visual perspective. Motivation has been included in the Final EIA, justifying the turbine locations.

### **Accessibility to the Reserve**

The extent of the study area covers key routes and intersections within a 10 km radius near the development on which the expected traffic generated by the development may have a significant impact. Thus, the following intersections were included in the study area:

1. Intersection 1: N1 and R318 (MR00295);

2. Intersection 2: R318 and DR01442 (Road to Matroosbergstasie);
3. Intersection 3: R318 and OP05749 (Road to UITSIG); and
4. Intersection 4: R318 and OP05748 (Road to Middelberg Guest Farm).

Nougaspoort Road is not anticipated to be affected by the development.

Kind Regards



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** [REDACTED]

**Sent:** Friday, September 20, 2024 7:42 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Re: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

You don't often get email from [REDACTED]. [Learn why this is important](#)

**EXTERNAL MESSAGE**

Dear Sadiya Salie,

Please find attached Drie Kuilen Nature Reserves comments to the EIA draft reports.

Kind regards,

Stefan Short

Manager

Drie Kuilen Nature Reserve

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, September 13, 2024 2:11 PM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** FW: Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

Dear Interested and Affected Party,

This is friendly reminder to please submit all comments on the proposed Hugo and Khoe Wind Energy Facilities, near De Doorns, Western Cape Province before the 23rd of September 2024.

Thank you,

Kind Regards



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**Sadiya Salie**  
Consultant

---

ERM 1st Floor, 240 Main Road  
Rondebosch, Great Westerford, [erm.com](http://erm.com)  
Cape Town

---

**From:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Sent:** Friday, August 30, 2024 10:40 AM

**To:** ERM Hugo & Khoe Wind Energy Facilities <[HugoKhoe@erm.com](mailto:HugoKhoe@erm.com)>

**Subject:** Notification of Submission: Draft EIA Report Hugo and Khoe WEFs, near De Doorns, Western Cape Province

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Thank you and regards,



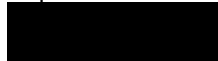
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Consultant

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Guyana	South Korea
Hong Kong	Spain
India	Switzerland
Indonesia	Taiwan
Ireland	Tanzania
Italy	Thailand
Japan	UAE
Kazakhstan	UK
Kenya	US
Malaysia	Vietnam
Mexico	
Mozambique	

**ERM's Cape Town Office**

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South Africa  
T: +27 21 681 5400

**[www.erm.com](http://www.erm.com)**