

# Holland & Associates



Environmental Consultants

Impact Assessments - Environmental Management Programs - Compliance Monitoring - Process Review

3 December 2021

Dear Interested and/or Affected Party

## **HIGHLANDS NORTH WIND ENERGY FACILITY (WEF), HIGHLANDS CENTRAL WEF, AND HIGHLANDS SOUTH WEF, AND ASSOCIATED INFRASTRUCTURE, NEAR SOMERSET EAST & PEARSTON, EASTERN CAPE PROVINCE: NOTIFICATION OF APPLICATIONS FOR AMENDMENT OF THE ENVIRONMENTAL AUTHORISATIONS AND AVAILABILITY OF THE DRAFT AMENDMENT ASSESSMENT REPORTS FOR COMMENT**

### **PUBLIC PARTICIPATION PROCESS**

**(HIGHLANDS NORTH WEF DFFE REF No.: 14/12/16/3/3/1/1955/AM1)  
(HIGHLANDS CENTRAL WEF DFFE REF No.: 14/12/16/3/3/1/1958/ AM1)  
(HIGHLANDS SOUTH WEF DFFE REF No.: 14/12/16/3/3/1/1960/AM1)**

The purpose of this letter is to inform potential and registered Interested and Affected Parties (I&APs), including relevant State Departments and Organs of State, that Highlands North Wind Energy Facility RF (Pty) Ltd, Highlands Central Wind Energy Facility RF (Pty) Ltd and Highlands South Wind Energy Facility RF (Pty) Ltd (hereafter referred to as “the Applicants”) are applying for an amendment of the Environmental Authorisations (EAs) in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA), as amended, Environmental Impact Assessment (EIA) Regulations (2014), as amended, for the authorised Highlands North Wind Energy Facility (WEF), Highlands Central WEF and Highlands South WEF, and their associated infrastructure, respectively, situated approximately 20km west of Somerset East and approximately 23km south-east of Pearston in the Eastern Cape Province.

I&APs are invited to register as I&APs and to provide comment on the three Applications for Amendment of the EAs and associated Draft Amendment Assessment Reports for the Highlands North WEF, Highlands Central WEF and Highlands South WEF, during the 30 day I&AP comment period (excluding the period 15 December – 5 January)<sup>1</sup>, i.e. from 6 December 2021 – 27 January 2022. Refer to 4 below for further details in this regard.

**Note: A combined Public Participation Process (PPP) for the three Applications for Amendment of the Environmental Authorisations is being undertaken**<sup>2</sup>.

<sup>1</sup> As per the EIA Regulations, 2014, as amended, “For any action contemplated in terms of these Regulations for which a timeframe is prescribed, the period of 15 December to 5 January must be excluded in the reckoning of days”.

<sup>2</sup> The combined PPP will include a combined registered I&AP database and a combined Comments and Responses Report (CRR) for the three Highlands WEFs EA amendment applications. The combined CRR will be included in the final Amendment Assessment Reports for each of the EA amendment applications.

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A brief background to the authorised projects as well as a summary of the proposed amendments to the EA for each WEF is outlined below, for your information.

## 1. Background

Environmental Authorisations (EAs) for the Highlands North, Central and South WEFs were granted by the Department of Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment (DFFE)) on 4 February 2020, 25 January 2020, and 21 January 2020, respectively. The authorised WEFs include the following:

- **84 MW Highlands North WEF:** Up to 14 turbines, with maximum hub height of 135m, maximum tip height of 200m, and maximum rotor diameter of 150m;
- **72 MW Highlands Central WEF:** Up to 12 turbines, with maximum hub height of 135m, maximum tip height of 200m, and maximum rotor diameter of 150m; and
- **90 MW Highlands South WEF:** Up to 15 turbines, with maximum hub height of 135m, maximum tip height of 200m, and maximum rotor diameter of 150m.

The infrastructure associated with each WEF includes cabling and transmission lines, hard standings adjacent to each turbine (including transformers), lay down areas, access roads, operations and maintenance buildings, fencing and a substation.

The three WEFs are located approximately 20 km west of Somerset East, south of the R63 provincial road, in the Eastern Cape Province, within the following properties: Farm 102 Rietfontein - Portion 0 Remaining Extent; Farm 104 Coetzees Fontein - Portion 0, Portion 1 and Portion 2; Farm 105 Doorn Rivier - Portion 0 Remaining Extent and Portion 1; Farm 143 Nels Kraal - Portion 0; Farm 146 Kiepersol - Portion 1; Farm 144 Nelskom - Portion 0 Remaining Extent; Farm 145 De Mullers Kraal - Portion 0 and Portion 8; Farm 361 Highlands - Portion 0 Remaining Extent; Farm 103 Spaarwater - Portion 0; Farm 101 Lekker water - Portion 2; and Farm 104 Coetzees Fontein - Portion 5, in the Blue Crane Route Local Municipality in the Sarah Baartman District Municipality. The site is located entirely within the Cookhouse Renewable Energy Development Zone (REDZ).

The EAs for the Highlands North, Central and South WEFs were granted by the DFFE for the following Listed Activities: Items 11, 12, 19, 24, 27, 28, 48 & 56 of GN R.983, as amended; Items 1 & 6 of GN R.984, as amended; and Items 4, 10, 12, 14, 18 and 23 of GN R.985, as amended, published in terms of the NEMA 2014 EIA Regulations, as amended.

The Applicants are now applying to DFFE for an Amendment to the EAs, in terms of Part 2 of Chapter 5 of the NEMA EIA Regulations, 2014, as amended, including:

- Amendments to the project description (including amendments to turbine specifications (in order to align to current international WTG models), a reduction in the number of turbines, removing the specified generation capacity for individual turbines, and addition of a Battery Energy Storage System (BESS) for each WEF);
- Amendments to the preliminary layout of the WEFs;
- Removal of certain Conditions of Authorization (i.e. Condition 39 for Highlands North WEF, and Conditions 17.1 and 42 for Highlands South WEF); and
- Correction of an editorial error in the Highlands Central WEF EA.

Holland & Associates Environmental Consultants has been appointed by the Applicants to undertake the requisite Application for Amendment of the EA for each WEF, in accordance with the NEMA EIA Regulations (2014), as amended.

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## 2. Proposed amendments to the Environmental Authorisations

### 2.1 Highlands North WEF

#### 2.1.1 Proposed amendments to the project description

The Applicant wishes to increase the maximum dimensions of the Wind Turbine Generators (WTGs) in order to align to current international WTG models. In this regard, the following amendments to the project description are proposed (refer to Table 1):

**Table 1:** Proposed amendments to the project description of the authorised Highlands North WEF

Component	Approved	Proposed amendment
<b>Number of turbines:</b>	14 turbines	<u>Up to 12</u> turbines
<b>Generation capacity of the WEF:</b>	Up to 84 MW	Up to <u>87</u> MW
<b>Generation capacity per turbine:</b>	Up to 6 MW	Remove generation capacity per turbine
<b>Rotor / blade diameters:</b>	Maximum of 150 m	Maximum of <u>175 m (except T01 with a maximum rotor diameter of 160 m and T12 with a maximum rotor diameter of 150 m).</u>
<b>Hub height:</b>	Up to 135 m	Up to <u>180 m</u>
<b>Tip height:</b>	Up to 200 m	Up to <u>267.5 m</u>
<b>Foundation Size:</b>	up to approximately 25 m x 25 m in total and up to 5 m deep per turbine	up to approximately <u>35 m x 35 m</u> in total and up to <u>7 m</u> deep per turbine
<b>Hard Stand area per turbine:</b>	5000 m <sup>2</sup>	<u>6000 m<sup>2</sup></u>
<b><u>Battery Storage</u></b>	N/A (Not currently included in project description)	<u>Battery Energy Storage System (BESS) adjacent to the substation on the temporary laydown area (with a footprint of approximately 1ha, and a height of approximately 8m).</u>
<b>Length of internal roads</b>	Approximately 50 km	Approximately <u>45</u> km

#### 2.1.2 Proposed amendments to the preliminary layout

The Applicant proposes minor adjustments to the turbine positions of the preliminary layout in order to minimise wake effects between turbines, as well as to avoid the proposed amended blade length extending into areas identified as highly sensitive for birds and bats. In this regard, the proposed amendments to the preliminary layout include the following:

- Refinement to the turbine positions (with two authorized turbine positions having been removed, given the proposed reduction in the number of turbines for the WEF).
- Refinement to the proposed access roads layout (due to amendments to turbine positions and the reduction in the number of turbines).
- The proposed BESS would be located adjacent to the substation, on the temporary laydown area.

#### 2.1.3 Proposed removal of Condition 39 of the EA

Condition 39 of the EA currently states that “*The development footprint must exclude the area identified as a potential target for the protected area expansion (NPAES)*”. As indicated in the Revised Final BAR for the project (November 2019), “*the majority of the development footprint falls within the Camdeboo Escarpment NPAES Focus Area*” (Arcus Consultancy Services South Africa,

2019). The Applicant is therefore applying for the removal of Condition 39 of the EA, as it appears to be in conflict with the authorized project description and authorized EIA listed activities for the project (particularly the authorized EIA listed activities related to activities within the NPAES). Furthermore, it should be noted that the Highlands WEF area does not fall within an NPAES Focus Area under the more recent 2016 NPAES Layer (Todd, 2021).

## 2.2 Highlands Central WEF

### 2.2.1 Proposed amendment to the project description

The following amendments to the project description are proposed (refer to Table 2):

**Table 2:** Proposed amendments to the project description of the authorised Highlands Central WEF

Component	Approved	Proposed amendment
<b>Number of turbines:</b>	Up to 12 turbines	Up to <u>10</u> turbines
<b>Generation capacity of the WEF:</b>	Up to 72 MW	No change
<b>Generation capacity per turbine:</b>	Up to 6 MW	Remove generation capacity per turbine
<b>Rotor / blade diameters:</b>	Maximum of 150 m	Maximum of <u>175 m</u>
<b>Hub height:</b>	Up to 135 m	Up to <u>180 m</u>
<b>Tip height:</b>	Up to 200 m	Up to <u>267.5 m</u>
<b>Foundation Size:</b>	up to approximately 25 m x 25 m in total and up to 5 m deep per turbine	up to approximately <u>35 m x 35 m</u> in total and up to <u>7 m</u> deep per turbine
<b>Hard Stand area per turbine:</b>	5000 m <sup>2</sup>	<u>6000 m<sup>2</sup></u>
<b>Battery Storage</b>	N/A (Not currently included in project description)	Battery Energy Storage System (BESS) <u>adjacent to the substation on the temporary laydown area (with a footprint of approximately 1 ha, and a height of approximately 8 m).</u>
<b>Length of internal roads</b>	Approximately 50 km	Approximately <u>45</u> km

### 2.2.2 Proposed amendment to the preliminary layout

The Applicant proposes minor adjustments to the turbine positions of the preliminary layout in order to minimise wake effects between turbines, as well as to avoid the proposed amended blade length extending into areas identified as highly sensitive for birds and bats. In this regard, the proposed amendments to the preliminary layout include the following:

- Refinement to the turbine positions (with two authorized turbine positions having been removed, given the proposed reduction in the number of turbines for the WEF).
- Refinement to the proposed access roads layout (due to amendments to turbine positions and the reduction in the number of turbines).
- Rotation of the Highlands Central WEF substation yard, to fit the proposed amended road layout.
- The proposed BESS would be located adjacent to the substation, on the temporary laydown area.

### 2.2.3 Proposed correction of editorial error in the EA

On page 1 of the EA, the project title refers to “70 MW” instead of “72 MW”. This editorial error is also made in Condition 1 on page 9 of the EA. However, the heading of the cover letter to the Environmental

Authorisation contains the correct description (i.e. “72 MW”). The Applicant proposes the correction of the errors on page 1 and 9 of the EA to ensure the project title and Condition 1 correctly reflect the authorized project.

## 2.3 Highlands South WEF

### 2.3.1 Proposed amendment to the project description

The following amendments to the project description are proposed (refer to Table 3):

**Table 3:** Proposed amendments to the project description of the authorised Highlands South WEF

Component	Approved	Proposed amendment
Number of turbines:	Up to 15 turbines	Up to <u>12 turbines</u>
Generation capacity of the WEF:	Up to 90 MW	No change
Generation capacity per turbine:	Up to 6 MW	Remove generation capacity per turbine
Rotor / blade diameters:	Maximum of 150 m	Maximum of <u>175 m</u>
Hub height:	Up to 135 m	Up to <u>180 m</u>
Tip height:	Up to 200 m	Up to <u>267.5 m</u>
Foundation Size:	up to approximately 25 m x 25 m in total and up to 5 m deep per turbine	up to approximately <u>35 m x 35 m</u> in total and up to <u>7 m</u> deep per turbine
Hard Stand area per turbine:	5000 m <sup>2</sup>	<u>6000 m<sup>2</sup></u>
<u>Battery Storage</u>	N/A (Not currently included in project description)	<u>Battery Energy Storage System (BESS) adjacent to the substation on the temporary laydown area (with a footprint of approximately 1ha, and a height of approximately 8m).</u>
Length of internal roads	Approximately 50 km	Approximately <u>45 km</u>

### 2.3.2 Proposed amendment to the preliminary layout

The Applicant proposes minor adjustments to the turbine positions of the preliminary layout in order to minimise wake effects between turbines, as well as to avoid the proposed amended blade length extending into areas identified as highly sensitive for birds and bats. In this regard, the proposed amendments to the preliminary layout include the following:

- Refinement to the turbine positions (with three authorized turbine positions having been removed, given the proposed reduction in the number of turbines for the WEF).
- Refinement to the proposed access roads layout (due to amendments to turbine positions and the reduction in the number of turbines).
- Rotation of the Highlands South WEF substation yard, to fit the proposed amended road layout.
- The proposed BESS would be located adjacent to the substation, on the temporary laydown area.

### 2.3.3 Proposed removal of Conditions 17.1 and 42 of the EA

Condition 17.1 of the EA states that the EMPr amendment must include the following: “An Electromagnetic Compatibility (EMC) Control Plan, which identifies potential risk, mitigation measures and appropriate test and acceptable procedures during the design and construction of this facility. The EMC Control Plan must be made available to the Square Kilometre Array South Africa (SKA-SA) for

*acceptance and the SKA-SA accepted EMC Control Plan must be submitted to this Department for approval prior to construction.*” Given that the project site is located in the Eastern Cape near Somerset East, approximately 300km from the Square Kilometre Array (SKA) Virtual Centre (core) in the Northern Cape, an EMC Control Plan is not deemed necessary for the proposed project. Confirmation in this regard was obtained from the South African Radio Astronomy Observatory (SARAO) in July 2021, who have confirmed that they do not require an EMC Control Plan for the project, and do not object to the development.

Condition 42 of the EA states that *“The development footprint must exclude the area identified as a potential target for the protected area expansion (NPAES)”*. As indicated in the Revised Final BAR for the project (November 2019), *“The majority of the development footprint lies within a NPAES focus area”* (Arcus Consultancy Services South Africa, 2019). The Applicant is therefore applying for the removal of Condition 42 of the EA, as it appears to be in conflict with the authorized project description and authorized EIA listed activities for the project (particularly the authorized EIA listed activities related to activities within the NPAES). Furthermore, it should be noted that the Highlands WEF area does not fall within an NPAES Focus Area under the more recent 2016 NPAES Layer (Todd, 2021).

### **3. Potential environmental impacts associated with the proposed amendments**

The potential environmental impacts associated with the proposed amendments have been outlined and assessed in the Amendment Assessment Report for each WEF. In this regard, all of the specialist studies undertaken during the Basic Assessment processes for the Highlands WEFs (which were concluded in 2020), have been updated as part of this EA Amendment Application process, to address and assess the potential environmental impacts associated with the proposed amendments, including the following: Flora and fauna; Aquatic; Avifauna (birds); Bats; Heritage, Archaeology and Palaeontology; Noise; Social; Agriculture; Traffic; and Visual.

In light of the findings of the specialist assessments, the proposed amendments are not anticipated to change the nature of impacts or result in an increased level of impacts. The impact significance ratings for all assessed impacts would remain the same as for the authorised WEFs, except for potential noise impacts, where the proposed amendments to the project have the advantage that it will decrease the projected noise levels as well as the significance of the noise impact during the operational phase.

### **4. Opportunity to Comment and Way Forward**

Copies of the Draft Amendment Assessment Reports for the three Highlands WEFs are available to I&APs for a **30 day comment period (excluding the period 15 December – 5 January)<sup>3</sup>, i.e. from 6 December 2021 – 27 January 2022**, as follows:

- Hard copies of the Draft Amendment Assessment Reports have been lodged at the following public libraries for the 30 day I&AP comment period:
  - Ernst van Heerden Library in Pearston
  - Langenhoven Public Library, Somerset East
- An electronic copy of the Draft Amendment Assessment Reports will be available for download on the Holland & Associates Environmental Consultants website ([www.hollandandassociates.net](http://www.hollandandassociates.net)). (Furthermore, a copy of the Executive Summaries will be made available for download as a separate document, in order to accommodate I&APs who may not want to download the full report).
- Upon request, the reports will be made available to I&APs via electronic file transfer or Dropbox link.

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<sup>3</sup> As per the EIA Regulations, 2014, as amended, Regulation 3(2) of GN R. 982, as amended, states that *“For any action contemplated in terms of these Regulations for which a timeframe is prescribed, the period of 15 December to 5 January must be excluded in the reckoning of days”*.

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- Electronic copies of the reports on CD or USB will be available on request.
- An outline of the proposed amendments can be provided verbally (telephonically) to I&APs who are illiterate and/or those with disabilities and/or any other disadvantage, if necessary. Such I&APs may provide their comments via telephone and/or sms (if preferred), and such comments will be included in the Comments and Responses Report.

I&APs are invited to review and comment on the abovementioned documents during the 30 day comment period. Should you have any comments, issues or concerns regarding the proposed amendments, please submit your comments in writing via post, e-mail or fax, **on or before 27 January 2022**, to:

Ms Tilly Watermeyer  
Email: [tilly@hollandandassociates.net](mailto:tilly@hollandandassociates.net)  
Post: P.O. Box 31108, Tokai, 7966  
Fax: 0867626126,  
Tel: 060 319 1217

All comments received during the 30 day I&AP comment period will be recorded and responded to in a Comments and Response Report (CRR), which will be included in the Final Amendment Assessment Reports that will be submitted to DFFE for decision making. Once DFFE issues their decisions on the three EA amendment applications, all registered I&APs will be notified in writing of DFFE's decision.

*Note: Protection of Personal Information Act, 2013 (Act 4 of 2013) Disclaimer: You are receiving correspondence with regards to the above-mentioned project, as your contact details have been captured into an initial Interested & Affected Parties (I&AP) database in terms of the Environmental Impact Assessment (EIA) Regulations (2014), as amended<sup>1</sup>, enacted in terms of the National Environmental Management Act (NEMA) (No. 107 of 1998), as amended. Should you wish to be removed from the I&AP Database at any stage, please notify the undersigned. Kindly note that by not responding to this correspondence it is our understanding that you consent to your contact details remaining in the registered I&AP Database and to receiving further correspondence with regards to the abovementioned EA amendment application processes for the Highlands WEF projects. Further to the above, kindly note that it is the responsibility of registered I&APs to notify the Environmental Assessment Practitioner (EAP) should their contact details need to be updated during the EA amendment application process (should they wish to continue receiving correspondence with regards to the EA amendment application process).*

Should you require any further information or have any queries, please contact the undersigned.

Yours sincerely



**TILLY WATERMEYER** (BSc Hons, MSc.)



**NICOLE HOLLAND** (Reg. EAP (EAPASA); Pr Sci Nat)

# Holland & Associates



Environmental Consultants

Impact Assessments - Environmental Management Programs - Compliance Monitoring - Process Review

3 Desember 2021

Geagte Belanghebbende en/of Geaffekteerde Party

**HIGHLANDS NOORD WINDENERGIE-AANLEG (WEA), HIGHLANDS SENTRAAL WEA EN HIGHLANDS SUID WEA, EN GEPAARDGAANDE INFRASTRUKTUUR, NABY SOMERSET-OOS & PEARSTON, OOS-KAAPROVINSIE: KENNISGEWING VAN DIE AANSOEKE VIR DIE WYSIGING VAN DIE OMGEWINGSMAGTIGINGS EN DIE BESIKBAARHEID VAN DIE KONSEP WYSIGING-EVALUERINGSVERSLAE VIR KOMMENTAAR**

## PROSES VAN OPENBARE DEELNAME

**(HIGHLANDS NOORD WEA – DFFE VERWYSINGSNR: 14/12/16/3/3/1/1955/AM1)  
(HIGHLANDS SENTRAAL WEA – DFFE VERWYSINGSNR: 14/12/16/3/3/1/1958/ AM1)  
(HIGHLANDS SUID WEA – DFFE VERWYSINGSNR: 14/12/16/3/3/1/1960/AM1)**

Die doel van hierdie brief is om moontlike en geregistreerde Belanghebbende en Geaffekteerde Partye (B&GPe), insluitende betrokke Staatsdepartemente en Staatsinstansies, in kennis te stel dat Highlands North Wind Energy Facility RF (Edms) Bpk, Highlands Central Wind Energy Facility RF (Edms) Bpk en Highlands South Wind Energy Facility RF (Edms) Bpk (hierna “die Applikante” genoem) aansoek doen vir Wysigings aan die Omgewingsmagtigings (OMs) wat in terme van die Wet op Nasionale Omgewingsbestuur (Nr 107 van 1998) (NEMA), soos gewysig, se Regulasies vir Omgewingsinvloedbepalings (OIBs) (2014), soos gewysig, uitgereik is vir die goedgekeurde Highlands Noord Windenergie-aanleg (WEA), Highlands Sentraal WEA en Highlands Suid WEA, asook die gepaardgaande infrastruktuur. Die WEAs is ongeveer 20km wes van Somerset-Oos en ongeveer 23km suid-oos van Pearston in die Oos-Kaaprovinsie geleë.

B&GPe word uitgenooi om as B&GPe te registreer en kommentaar te lewer op die drie Aansoeke vir die Wysiging van die OMs, asook op die gepaardgaande Konsep Wysiging-evalueringsverslae vir die Highlands Noord WEA, Highlands Sentraal WEA en Highlands Suid WEA. Die 30-dae kommentaar-tydperk vir B&GPe (uitgesluit die tydperk 15 Desember – 5 Januarie)<sup>1</sup> strek van 6 Desember 2021 - 27 Januarie 2022. Verwys na Item 4 hieronder vir verdere inligting hieromtrent.

**Neem kennis: Die drie Aansoeke vir die Wysiging van die Omgewingsmagtigings word as een gesamentlike Proses van Openbare Deelname (PPP) hanteer<sup>2</sup>.**

<sup>1</sup> Ingevolge die OIB-regulasies, 2014, soos gewysig: “Die tydperk 15 Desember tot 5 Januarie moet uitgesluit word in die berekening van die voorgeskrewe aantal dae waarbinne aksies wat kragtens hierdie Regulasies onderneem word, uitgevoer moet word”.

<sup>2</sup> Die gesamentlike PPP sluit in 'n gesamentlike databasis vir geregistreerde B&GPe en 'n gesamentlike Kommentaar- en Antwoordverslag (KAV) vir al drie die Highlands WEAs se OM-wysigingsaansoeke. Die gesamentlike KAVs sal ingesluit word by die finale Wysiging-evalueringsverslae vir elk van die OM-wysigingsaansoeke.



Ter inligting vind u hieronder 'n kort agtergrond oor die gemagtigde projekte, sowel as 'n opsomming van die voorgestelde wysigings aan die OM vir elke WEA.

## 1. Agtergrond

Omgewingsmagtigings (OMs) is onderskeidelik op 4 Februarie 2020, 25 Januarie 2020 en 21 Januarie 2020 deur die Departement van Omgewingsake (DOS) (nou die Departement van Bosbou, Visserye en die Omgewing (DFFE)) uitgereik vir die Highlands Noord, Sentraal en Suid WEAs. Die gemagtigde WEAs bestaan onder andere uit die volgende:

- **84 MW Highlands Noord WEA:** Tot 14 turbines, elk met 'n maksimum naafhoogte van 135m en maksimum tip-hoogte van 200m, en 150m as die maksimum deursnee van die draaivlerke;
- **72 MW Highlands Sentraal WEA:** Tot 12 turbines, elk met 'n maksimum naafhoogte van 135m en maksimum tip-hoogte van 200m, en 150m as die maksimum deursnee van die draaivlerke; en
- **90 MW Highlands Suid WEA:** Tot 15 turbines, elk met 'n maksimum naafhoogte van 135m en maksimum tip-hoogte van 200m, en 150m as die maksimum deursnee van die draaivlerke.

Die infrastruktuur wat deel is van elke WEA sluit in kabels en transmissiellyn, harde oppervlaktes langs elke turbine (met transformators), bergingsareas, toegangspaaie, geboue vir die bedryf en onderhoud van die WEAs, omheining en 'n substasie.

Die drie WEAs is ongeveer 20 km wes van Somerset-Oos, suid van die R63 provinsiale pad in die Oos-Kaap geleë, en wel op die volgende eiendom: Plaas 102 Rietfontein - Gedeelte 0 Oorblywende Restant; Plaas 104 Coetzees Fontein - Gedeelte 0, Gedeelte 1 en Gedeelte 2; Plaas 105 Doorn Rivier - Gedeelte 0 Oorblywende Restant en Gedeelte 1; Plaas 143 Nels Kraal - Gedeelte 0; Plaas 146 Kiepersol - Gedeelte 1; Plaas 144 Nelskom - Gedeelte 0 Oorblywende Restant; Plaas 145 De Mullers Kraal - Gedeelte 0 en Gedeelte 8; Plaas 361 Highlands - Gedeelte 0 Oorblywende Restant; Plaas 103 Spaarwater - Gedeelte 0; Plaas 101 Lekker water - Gedeelte 2; en Plaas 104 Coetzees Fontein, Gedeelte 5. Die terrein val binne die Blue Crane Route Plaaslike Munisipaliteit en die Sarah Baartman Distriksmunisipaliteit en is geleë in die Cookhouse Ontwikkelingsone vir Hernubare Energie (REDZ).

Die OMs vir die Highlands Noord, Sentraal en Suid WEAs is deur die DFFE goedgekeur vir die volgende gelyste aktiwiteite: Items 11, 12, 19, 24, 27, 28, 48 & 56 in GK R.983, soos gewysig; Items 1 en 6 in GK R.984, soos gewysig; en Items 4, 10, 12, 14, 18 en 23 in GK R.985, soos gewysig, en wat uitgereik is kragtens NEMA se 2014 OIB-regulasies, soos gewysig.

Die Applikante doen nou by die DFFE aansoek om die OMs in terme van Gedeelte 2 van Hoofstuk 5 van NEMA se OIB-regulasies, 2014, soos gewysig, onder andere as volg te verander:

- Wysigings aan die projekbeskrywing (dit sluit in wysigings aan turbine-spesifikasies [sodat dit ooreenstem met bestaande internasionale WTG-modelle], afname in die aantal turbines, wegdoen met die spesifieke opwekkingsvermoë vir individuele turbines, en die byvoeging van 'n Battery Energie-opgaringstelsel (BESS) vir elke WEA);
- Wysigings aan die voorlopige uitleg van die WEAs;
- Verwydering van sekere Magtigingsvoorwaardes (i.e. Voorwaarde 39 vir die Highlands Noord WEA, en Voorwaardes 17.1 en 42 vir die Highlands Suid WEA); en
- Regstelling van 'n outeursfout in die OM vir die Highlands Sentraal WEA.

Holland & Associates Omgewingskonsultante is deur die Applikante aangestel om die Aansoeke vir die Wysiging van die OMs te hanteer. Hierdie dien as kennisgewing dat daar begin word met die Proses van Openbare Deelname in terme van NEMA se OIB-regulasies (2014), soos gewysig.

## 2. Voorgestelde wysigings aan die Omgewingsmagtigings

### 2.1 Highlands Noord WEA

#### 2.1.1 Voorgestelde wysigings aan die projekbeskrywing

Die Applikant will graag die maksimum afmetings van die Windturbine-generators (WTGs) vergroot om dit te laat ooreenstem met huidige internasionale WTG-modelle. Om hierdie rede word die volgende wysigings aan die projekbeskrywing voorgestel (verwys na Tabel 1):

**Tabel 1:** Voorgestelde wysigings aan die projekbeskrywing van die gemagtigde Highlands Noord WEA

Komponent	Goedgekeur	Voorgestelde Wysiging
Aantal turbines:	14 turbines	Tot <u>12</u> turbines
Opwekkingskapasiteit van die WEA:	Tot 84 MW	Tot <u>87</u> MW
Opwekkingskapasiteit per turbine:	Tot 6 MW	Doen weg met opwekkingskapasiteit per turbine
Rotor / deurnsee van draaivlerke:	Maksimum 150 m	Maksimum <u>175 m</u> (behalwe T01 met 'n maksimum rotor-deurnsee van 160 m en T12 met 'n maksimum rotor-deurnsee van 150 m).
Naafhoogte:	Tot 135 m	Tot <u>180 m</u>
Tip-hoogte:	Tot 200 m	Tot <u>267.5 m</u>
Grootte van fondasie:	Tot ongeveer 25 m x 25 m in totaal en tot 5 m diep per turbine	Tot ongeveer <u>35 m x 35 m</u> in totaal en tot <u>7 m</u> diep per turbine
Harde oppervlakte per turbine:	5000 m <sup>2</sup>	<u>6000 m<sup>2</sup></u>
<b>Battery-opgaring</b>	n.v.t. (Tans nie by projekbeskrywing ingesluit nie)	<u>Battery Energie-opgaringstelsel (BESS) langs die substasie op die tydelike bergingsarea (met 'n voetspoor van ongeveer 1ha, en 'n hoogte van ongeveer 8m).</u>
Lengte van interne paaie	Ongeveer 50 km	Ongeveer <u>45 km</u>

#### 2.1.2 Voorgestelde wysigings aan die voorlopige uitleg

Die Applikant beoog om klein veranderings aan te bring aan die plasing van die turbines in die voorlopige uitleg om die gevolge van die volgstroom tussen turbines te minimaliseer, sowel as om te voorkom dat die voorgestelde gewysigde langer draaivlerke tot in gebiede strek wat as uiters sensitief vir voëls en vlermuise geïdentifiseer is. Die voorgestelde wysigings aan die voorlopige uitleg sluit dus die volgende in:

- Verfyning van die plasing van turbines (met twee minder gemagtigde plasinge van turbines a.g.v. die voorgestelde afname in die aantal turbines by die WEA).
- Verfyning van die voorgestelde uitleg van toegangspaaie (a.g.v. die wysigings aan turbine-plasinge en die afname in die aantal turbines).
- Die voorgestelde BESS sal op die tydelike bergingsarea langs die substasie opgerig word.

#### 2.1.3 Voorgestelde verwydering van Voorwaarde 39 van die OM

Voorwaarde 39 van die OM lees tans as volg: "Die ontwikkelingsvoetspoor moet die gebied uitsluit wat moontlik vir die uitbreiding van die beskermde gebied geïdentifiseer is (NPAES)". Soos aangedui in die projek se Hersiene Finale OBPv (November 2019), "is die grootste gedeelte van die

ontwikkelingsvoetspoor binne die Camdeboo Plato NPAES-fokusgebied” (Arcus Consultancy Services South Africa, 2019). Die Applikant doen dus aansoek om Voorwaarde 39 van die OM ter syde te stel, aangesien dit in konflik blyk te wees met die gemagtigde projekbeskrywing en die gemagtigde OIB-gelyste aktiwiteite vir die projek (veral wat die gemagtigde OIB-gelyste aktiwiteite binne die NPAES betref). Daar moet ook op gelet word dat die Highlands WEA-gebied volgens die mees onlangse 2016 NPAES-oorlegkaart (Todd, 2021) nie binne die NPAES-fokusgebied val nie.

## 2.2 Highlands Sentraal WEA

### 2.2.1 Voorgestelde wysiging van die projekbeskrywing

Die volgende wysigings aan die projekbeskrywing word voorgestel (verwys na Tabel 2):

**Tabel 2:** Voorgestelde wysigings aan die projekbeskrywing van die gemagtigde Highlands Sentraal WEA

Komponent	Goedgekeur	Voorgestelde Wysiging
<b>Aantal turbines:</b>	Tot 12 turbines	Tot <u>10</u> turbines
<b>Opwekkingskapasiteit van die WEA:</b>	Tot 72 MW	Geen verandering
<b>Opwekkingskapasiteit per turbine:</b>	Tot 6 MW	Doen weg met opwekkingskapasiteit per turbine
<b>Rotor / deursnee van draaivlerke:</b>	Maksimum 150 m	Maksimum <u>175 m</u>
<b>Naafhoogte:</b>	Tot 135 m	Tot <u>180 m</u>
<b>Tip-hoogte:</b>	Tot 200 m	Tot <u>267.5 m</u>
<b>Grootte van fondasie:</b>	Tot ongeveer 25 m x 25 m in totaal en tot 5 m diep per turbine	Tot ongeveer <u>35 m x 35 m</u> in totaal en tot <u>7 m</u> diep per turbine
<b>Harde oppervlakte per turbine:</b>	5000 m <sup>2</sup>	<u>6000 m<sup>2</sup></u>
<b>Battery-opgaring</b>	n.v.t. (Tans nie by projekbeskrywing ingesluit nie)	<u>Battery Energie-opgaringstelsel (BESS) langs die substasie op die tydelike bergingsarea (met 'n voetspoor van ongeveer 1ha, en 'n hoogte van ongeveer 8m).</u>
<b>Lengte van interne paaie</b>	Ongeveer 50 km	Ongeveer <u>45</u> km

### 2.2.2 Voorgestelde wysiging van die voorgestelde uitleg

Die Applikant beoog om klein veranderings aan te bring aan die plasing van die turbines in die voorlopige uitleg om die gevolge van die volgroom tussen turbines te minimaliseer, sowel as om te voorkom dat die voorgestelde gewysigde langer draaivlerke tot in gebiede strek wat as uiters sensitief vir voëls en vlermuise geïdentifiseer is. Die voorgestelde wysigings aan die voorlopige uitleg sluit dus die volgende in:

- Verfyning van die plasing van turbines (met twee minder gemagtigde plasinge van turbines a.g.v. die voorgestelde afname in die aantal turbines by die WEA).
- Verfyning van die voorgestelde uitleg van toeganspaaie (a.g.v. die wysigings aan turbineplasinge en die afname in die aantal turbines).
- Rotasie van die Highlands Sentraal WEA-substasie se terrein om die voorgestelde veranderde paduitleg te akkommodeer.
- Die voorgestelde BESS sal op die tydelike bergingsarea langs die substasie opgerig word.

### 2.2.3 Voorgestelde regstelling van 'n outeursfout in die OM

Die projektitel op bladsy 1 van die OM verwys na "70 MW" in plaas van "72 MW". Hierdie outeursfout kom ook voor in Voorwaarde 1 op bladsy 9 van die OM. Die opskrif in die Omgewingsmagtiging se dekbrief is egter korrek (i.e. "72 MW"). Die Applikant versoek dat die foute op bladsye 1 en 9 van die OM reggestel word sodat die projektitel en Voorwaarde 1 ooreenstem met die gemagtigde projek.

## 2.3 Highlands Suid WEA

### 2.3.1 Voorgestelde wysiging aan die projekbeskrywing

Die volgende wysigings aan die projekbeskrywing word voorgestel (verwys na Tabel 3):

**Tabel 3:** Voorgestelde wysigings aan die projekbeskrywing van die gemagtigde Highlands Suid WEA

Komponent	Goedgekeur	Voorgestelde Wysiging
<b>Aantal turbines:</b>	Tot 15 turbines	Tot <u>12 turbines</u>
<b>Opwekkingskapasiteit van die WEA:</b>	Tot 90 MW	Geen verandering
<b>Opwekkingskapasiteit per turbine:</b>	Tot 6 MW	Doen weg met opwekkingskapasiteit per turbine
<b>Rotor / deursnee van draaivlerke:</b>	Maksimum 150 m	Maksimum <u>175 m</u>
<b>Naafhoogte:</b>	Tot 135 m	Tot <u>180 m</u>
<b>Tip-hoogte:</b>	Tot 200 m	Tot <u>267.5 m</u>
<b>Grootte van fondasie:</b>	Tot ongeveer 25 m x 25 m in totaal en tot 5 m diep per turbine	Tot ongeveer <u>35 m x 35 m</u> in totaal en tot <u>7 m</u> diep per turbine
<b>Harde oppervlakte area per turbine:</b>	5000 m <sup>2</sup>	<u>6000 m<sup>2</sup></u>
<b>Battery-opgaring</b>	n.v.t. (Tans nie by projekbeskrywing ingesluit nie)	<u>Battery Energie-opgaringstelsel (BESS) langs die substasie op die tydelike bergingsarea (met 'n voetspoor van ongeveer 1ha, en 'n hoogte van ongeveer 8m).</u>
<b>Lengte van interne paaie</b>	Ongeveer 50 km	Ongeveer <u>45 km</u>

### 2.3.2 Voorgestelde Wysiging aan die voorgestelde uitleg

Die Applikant beoog om klein veranderings aan te bring aan die plasing van die turbines in die voorlopige uitleg om die gevolge van die volgroom tussen turbines te minimaliseer, sowel as om te voorkom dat die voorgestelde gewysigde langer draaivlerke tot in gebiede strek wat as uiters sensitief vir voëls en vlermuise geïdentifiseer is. Die voorgestelde wysigings aan die voorlopige uitleg sluit dus die volgende in:

- Verfyning van die plasing van turbines (met drie minder gemagtigde plasinge van turbines a.g.v. die voorgestelde afname in die aantal turbines by die WEA).
- Verfyning van die voorgestelde uitleg van toeganspaaie (a.g.v. die wysigings aan turbine-plasinge en die afname in die aantal turbines).
- Rotasie van die Highlands Suid WEA-substasie se terrein om die voorgestelde veranderde paduitleg te akkommodeer.
- Die voorgestelde BESS sal op die tydelike bergingsarea langs die substasie opgerig word.

### 2.3.3 Voorgestelde verwydering van Voorwaardes 17.1 en 42 in die OM

Voorwaarde 17.1 van die OM noem dat 'n Wysiging van die Omgewingbestuursprogram (EMPr) die volgende moet insluit: “’n *Kontroleplan vir Elektromagnetiese Versoenbaarheid (EMC)*, waarin die *moontlike risiko’s, mitigasiemaatreëls en toepaslike toetse en aanvaarbare prosedures tydens die ontwerp en konstruksie van hierdie aanleg geïdentifiseer is. Die EMC-kontroleplan moet vir goedkeuring voorgelê word aan Square Kilometre Array South Africa (SKA-SA) en die goedgekeurde SKA-SA EMC-kontroleplan moet voor konstruksie by hierdie Departement vir goedkeuring ingedien word.*” Aangesien die projekterrein in die Oos-Kaap naby Somerset-Oos, ongeveer 300km vanaf die Square Kilometre Array (SKA) se Virtuele Middelpunt in die Noord-Kaap geleë is, word 'n EMC-kontroleplan nie as van toepassing op hierdie voorgestelde projek beskou nie. Hierdie aanname is in Julie 2021 deur die Suid-Afrikaanse Radio Astronomie Sterrewag (SARAO bevestig), wat genoem het dat hulle nie 'n EMC-kontroleplan vir die projek benodig nie, asook geen beswaar teen die ontwikkeling het nie.

Voorwaarde 42 van die OM lui as volg: “*Die ontwikkelingsvoetspoor moet die gebied uitsluit wat moontlik vir die uitbreiding van die beskermde gebied geïdentifiseer is (NPAES)*”. Soos in die projek se Hersiene Finale OBPv (November 2019), lê die “*grootste gedeelte van die ontwikkelingsvoetspoor binne 'n NPAES fokusgebied*” (Arcus Consultancy Services South Africa, 2019). Die Applikant doen daarom aansoek om Voorwaarde 43 van die OM ter syde te stel, aangesien dit in konflik blyk te wees met die gemagtigde projekbeskrywing en die gemagtigde OIB-gelyste aktiwiteite vir die projek (veral wat betref die gemagtigde OIB-gelyste aktiwiteite binne die NPAES). Daar moet ook op gelet word dat die Highlands WEA-gebied volgens die mees onlangse 2016 NPAES-oorlegkaart (Todd, 2021) nie binne die NPAES-fokusgebied val nie.

### 3. Moontlike omgewingsimpakte van die voorgestelde wysigings

Die moontlike omgewingsimpakte van die voorgestelde wysigings word in die Wysiging-evalueringsverslag vir elke WEA uiteengesit en beoordeel. Alle spesialisstudies wat tydens die Basiese Omvangbepalingsproses vir die Highlands WEAs (voltooi in 2020) onderneem is, is daarom as deel van hierdie Aansoekproses vir OM-wysigings opgedateer. Die moontlike omgewingsimpakte van die voorgestelde wysigings op onder andere die volgende aspekte is aangespreek en beoordeel: Flora en fauna; Akwatiese lewe; Avifauna (voëls); Vlermuise; Erfenis, Argeologie en Paleontologie; Geraas; Maatskaplike faktore; Landbou; Verkeer; en Visueel.

Op grond van die bevindinge van die deskundige beoordelings, behoort die voorgestelde wysigings nie die aard van die impakte te verander nie, of daartoe lei dat die vlak van die impakte toeneem nie. Die skatting vir die betekenisvolheid van die beoordeelde impakte bly dieselfde as in die gemagtigde WEAs. Die enigste verskil kom voor by moontlike geraasimpakte, waar die voorgestelde wysigings aan die projek die voordeel sal hê dat die geraasvlakke van die projek sal afneem, en dus ook die betekenisvolheid van die geraas tydens die bedryfsfase.

### 4. Geleentheid om Kommentaar te lewer en die Volgende Stappe

Afskrifte van die Konsep Wysiging- Wysiging-evalueringsverslage vir die Highlands WEAs sal vir 'n **30-dag kommentaartydperk (uitgesluit die tydperk 15 Desember – 5 Januarie)<sup>3</sup>, i.e. van 6 Desember 2021 – 27 Januarie 2022**, as volg aan B&GPe beskikbaar gestel word:

- Afskrifte van die Konsep Wysiging-evalueringsverslae is by die volgende openbare bibliotek beskikbaar gestel sodat B&GPe dit gedurende die 30-dag kommentaartydperk kan lees:
  - Ernst van Heerden Biblioteek in Pearston

<sup>3</sup> Ingevolge die OIB-regulasies, 2014, soos gewysig: “*Die tydperk 15 Desember tot 5 Januarie moet uitgesluit word in die berekening van die voorgeskrewe aantal dae waarbinne aksies wat kragtens hierdie Regulasies onderneem word, uitgevoer moet word*”.

- Langenhoven Openbare Biblioteek, Somerset-Oos
- 'n Elektroniese afskrif van die Konsep Wysiging-beoordelingsverslae kan afgelaai word vanaf Holland & Associates Environmental Consultants se webblad ([www.hollandandassociates.net](http://www.hollandandassociates.net)). ('n Afskrif van die Uitvoerende Opsomming sal ook as 'n aparte dokument afgelaai kan word deur B&GP wat nie die volledige verslag wil aflaai nie).
- Die verslae kan ook, op versoek, elektronies via 'n Dropbox-skakel aangestuur word.
- Elektroniese kopieë van die verslae is ook op versoek op 'n CD of USB beskikbaar.
- Indien nodig, sal 'n woordelike opsomming van die voorgestelde wysigings telefonies beskikbaar wees vir B&GP wat nie kan lees nie en/of diegene met gestremdhede en/of op enige ander manier benadeel is. Sodanige B&GP kan hulle kommentaar telefonies en/of per teksboodskap (indien so verkies) indien en hierdie kommentaar sal opgeneem word in die Kommentaar- en Antwoordverslag.

B&GP word uitgenooi om gedurende die 30-dag kommentaartydperk op bogenoemde dokumente kommentaar te lewer. Indien u enige kommentaar het op, probleme het met of bekommernis het oor die voorgestelde wysigings, word u versoek om u kommentaar skriftelik per pos, epos of faks **voor of op 27 Januarie 2022**, te stuur aan:

Me Tilly Watermeyer  
 Epos: [tilly@hollandandassociates.net](mailto:tilly@hollandandassociates.net)  
 Pos: Posbus 31108, Tokai, 7966  
 Faks: 0867626126,  
 Tel: 060 319 1217

Alle kommentaar wat gedurende die 30-dag B&GP kommentaarperiode ontvang is, sal aangeteken en beantwoord word in 'n Kommentaar- en Antwoordverslag (KAV), wat deel sal vorm van die Finale Wysiging-evalueringsverslae wat vir besluitneming by die DFFE ingedien sal word. Sodra die DFFE sy besluit op die drie OM-wysigingsaansoeke bekend gemaak het, sal alle geregistreerde B&GP skriftelik van die DFFE se besluit in kennis gestel word.

*Neem kennis: Wet op die Beskerming van Persoonlike Inligting (Protection of Personal Information Act), 2013 (Wet Nr 4 van 2013) Vrywaringsverklaring: U ontvang hierdie skrywe i.v.m. bogenomede projek aangesien u kontakbesonderhede vervat is in die aanvanklike databasis van Belanghebbende en Geaffekteerde Partye (B&GP) kragtens die Regulasies vir Omgewingsinvloedbepalings (OIB) (2014), soos gewysig<sup>1</sup>, en wat uitgevoer word in terme van die Wet op Nasionale Omgewingsbestuur (NEMA) (Nr 107 van 1998), soos gewysig. Tree asseblief ter eniger tyd met die ondergetekende in verbinding indien u naam van die B&GP-databasis verwyder moet word. Neem asb kennis dat, indien u nie op hierdie skrywe reageer nie, ons sal aanvaar dat u wel toegestem het om u kontakbesonderhede op die geregistreerde B&GP-databasis te behou en u dus verdere korrespondensie oor bogenoemde OM-wysigingsproses vir die Highlands WEA-projekte sal ontvang. U word voorts daarop gewys dat dit die verantwoordelikheid van die geregistreerde B&GP is om die Omgewingsbeoordelingspraktisyn (OBP) in kennis te stel indien enige kontakbesonderhede tydens die OM-wysigingsproses verander (indien u verdere korrespondensie oor die OM-wysigingsproses wil ontvang).*

Tree asseblief met onderstaande in verbinding indien u enige verdere inligting verlang of navrae het:

Die uwe



**TILLY WATERMEYER** (BSc Hons, MSc.)



**NICOLE HOLLAND** (Reg. EAP (EAPASA); Pr Sci Nat)