

6 September, 2022

Our ref: 1408/FB/gpk

DEFF Ref: 12/12/20/1993/1 & 14/12/16/3/2/75

South African Heritage Resources Agency

Ms Natasha Higgit

Dear Madam:

Noblesfontein Wind Farm Operational Environmental Management Programme

The comments received from the SAHRA on the Operational Environmental Management Programme (OEMPr) has reference.

Please find below the responses to the comments received from the Department.

Comment	Response
<p>Noblesfontein Wind Farm was issued an Environmental Authorisation (EA) during 2012 (DFFE Ref: 12/12/20/1993/1 & 14/12/16/3/2/75) and has since been constructed. Coria (PFK) Investments 28 (Pty) Ltd operates a commercial wind energy facility, as well as the associated infrastructure (Substation and powerline) on a site near Victoria West within the Northern and Western Cape Province. The facility is to be called the Noblesfontein Wind Energy Facility of up to 44 turbines with a generating capacity of up to 123 MW over an area of approximately 22 ha (on farm portions: remaining extent of Farm Noblesfontein 227, Portion 3 of the Farm Noblesfontein 227, Portions 2, 3 and 4 of the Farm Ezelsfontein 235, remaining extent of the Farm Annex Noblesfontein 234, Portion 1 of the Farm Annex Noblesfontein 234 and Portion 1 of the Farm Rietkloofplaaten 239. With reference to the Section 24G process undertaken for the above facility relating to the changes associated with the internal road layout (Ref: 14/12/16/3/2/75), the current layout of the facility has been identified as a compliance matter and included in the latest Environmental Audit Report undertaken for this wind farm. The Department's Compliance and Enforcement Section has since responded to the Applicant with a Warning Letter. It is thus understood that the matter has been closed by Compliance and Enforcement. The layout of the above development has been updated to reflect</p>	<p>Comment Noted.</p>

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Directors: T Nkhahle, L Whitlow, A Smith.

Comment	Response
<p>the current layout of the wind farm and now requires an amendment of the EMPr to formalise this.</p> <p>Environmental Impact Management Services (EIMS) has been appointed by Coria (PFK) Investments 28 (Pty) Ltd to update the Environmental Management Programme for the authorised Noblesfontein Wind Energy Facility (12/12/20/1993/1) and the authorised 132KV powerline and substation (14/12/16/3/3/1/744). The updated EMPr is for the Operational Phase only.</p>	
<p>The Noblesfontein Wind Energy Facility was authorised in 2011 and the powerline was authorised in 2013. SAHRIS Case ID 2005 (https://sahris.sahra.org.za/cases/karoo-renewable-wind-energy-facility-northern-cape) is connected to the original EA for the WEF and a current amendment application is under review on SAHRIS Case ID 16672 (https://sahris.sahra.org.za/cases/proposed-amendment-existing-wind-energy-facility-nobelsfontein-northern-cape). It is noted that there are outstanding studies as part of the original EA application as per the Interim Comment issued on Case ID 2005 on the 04/06/2013 and Case ID 16672 on the 23/07/2021.</p>	<p>Thank you for your comment. It should be noted that the SAHRIS Case ID 16672 is a separate Basic Assessment application that was undertaken by the owner for potential expansion of the wind farm and is not related to the current Environmental Impact Management Services (Pty) Ltd (EIMS) EMPr amendment application. Should there be any further action required in terms of case 16672, it is anticipated that this should be addressed in the EMPr for that specific application.</p>
<p>No SAHRIS application is evident for the powerline development and therefore SAHRA has not had an opportunity to review and provide comments on any Heritage Impact Assessment conducted for the powerline development.</p>	<p>Thank you for your comment. With reference to SAHRIS Case ID 2005, it is understood that although no separate application was made on SAHRIS, the Powerline was included in Case 2005 and assessed as part of the main WEF EIA.</p>
<p>The Operational activities for the above development include the following:</p> <ul style="list-style-type: none"> • Operation of the wind turbines; • Maintenance of the wind energy facility; and • Site operation of maintenance for substation. <p>The only Operational mitigation measures provided in the OEMPr include that the HIA recommendations should be implemented to limit any potential negative impacts on the sense of place with regards to visual impacts.</p> <p>In an Interim Comment issued on the 21/01/2022, SAHRA requested that the EA, EMPr and HIA for the powerline development be submitted to the case for review. Since the issuing of the Interim Comment, the above documents have been submitted for review (22/02/2022).</p>	<p>Thank you for your comment. Comment noted.</p>

Comment	Response
<p>The HIA is noted to have been submitted to Case ID 2005 and has been commented on previously. The 2013 EMPr does not include the conditions issued by SAHRA on 04/06/2013. Conditions 21 and 22 of the Environmental Authorisation issued 2013 are noted.</p>	
<p>Interim Comment The SAHRA Archaeology, Palaeontology and Meteorites Unit requests the following:</p> <ul style="list-style-type: none"> The outstanding field-based PIA as requested in the Interim Comment issued on the 23/07/2021 and recommendations of the 2021 Heritage Screener in SAHRIS Case ID 16672 be conducted before further mitigation and management measures can be provided for the OEMPr; 	<p>Thank you for your comment. As mentioned above, It should be noted that the SAHRIS Case ID 16672 is a separate Basic Assessment application that was undertaken by the owner for potential expansion of the wind farm and is not related to the current EIMS EMPr amendment application. Should there be any further action required in terms of case 16672, it is anticipated that this should be addressed as part of that application and assessment and included in the EMPr for that specific application.</p>
<ul style="list-style-type: none"> Any conditions relevant to the Noblesfontein WEF contained within the Interim Comment issued on 04/06/2013 for Case ID 2005 be included in the OEMPr. 	<p>Thank you for your comment. Owing to the fact that the development has already been completed, the relevant applicable items that could still be implemented have been included in the OEMPr. These include:</p> <ul style="list-style-type: none"> <i>The developer or archaeologist should apply to SAHRA for a destruction permit for sites S46 and GPS48 if needed or if it is requested by the environmental authorities.;</i> No construction activity is allowed within 100 m of the rock paintings, rock engravings and rock shelters where rock art material is preserved and sites with stone walls and kraals. If this distance cannot be maintained and development occurs within 100 m of any of these sites, a temporary fence must be erected around the site (in consultation with the archaeologist) and foremen and workmen educated about its significance; In no circumstance will development be allowed within 50 m from the stone walls and kraals and from rock art sites; The rock engravings situated at S47-ENG7 and S48-ENG8 are not affected during construction or operation but the developer will compile and submit a Heritage Management Plan to SAHRA for review if SAHRA considers it necessary;; The graves located in the area are not affected by the site. If relocation for the exposed human remains were necessary due to any deviation of the original project, provisions stipulated in section 36 of the National Heritage Resources Act (Act No 25 of 1999) and related guidelines will be applicable.

Comment	Response
Additionally, please upload a kml file of the application area and powerline. Further comments will be issued upon receipt of the above.	A KML will be uploaded to the case file.

Should you have any queries or concerns in this regard, please do not hesitate to contact the undersigned.

Sincerely,

GP Kriel