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Savannah Environmental (Pty) Ltd
Care of Michael Morreira

Per email: Michael@savannahsa.com

Dear Michael

PART 1 AMENDMENT: VISUAL ASSESSMENT

Proposed Mulilo Springbok Wind Energy Facility, Nama Khoi Local Municipality of the Namakwa District Municipality, Northern Cape Province

1. BACKGROUND AND PURPOSE OF THE AMENDMENT

Mulilo Renewable Projects Developments (Pty) Ltd (Mulilo) trading as Mulilo Springbok Wind Power (Pty) Ltd is proposing to amend the Environmental Authorisation (EA) for the Springbok Wind Energy Facility, by extending the EA validity by an additional five (5) years. Extension of the validity of the EA will ensure that the EA remains valid for the undertaking of the authorised activities.

The EA Amendment will be completed in terms of Regulation 30(1)(a) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, including the additional studies and public participation required by the Department Forestry, Fisheries and the Environment (DFFE). Condition 1.7 of the First Issue Environmental Authorisation, Issued on the 27th of July 2011, Department Environmental Affairs (DEA) Reference 12/12/20/1721 states that:

“This activity must commence within a period of three (3) years from the date of issue. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.”

Consequent amendments to extend the validity of the authorisation have been made as follows:

- 12/12/20/1721 – authorised on the 27 June 2014 extending the validity to the 27th of June 2016
- 12/12/20/1721/AM3 – authorised on the 18 May 2016 extending the validity to the 27th of July 2018
- 12/12/20/1721/AM6 – authorised on the 3 August 2018 extending the validity to the 27th of July 2021
- The most recent 12/12/20/1721/AM8 – 28 June 2021 extending the validity to the 27th of

January 2023 which states the following.

“This activity must commence within a period of eleven (11) years and six (6) months from the date of issue of the authorisation (i.e. the EA lapses on 27 January 2023). If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.”

The applicant, Mulilo Renewable Projects Developments (Pty) Ltd thus requests that the Competent Authority amends Condition 1.7 of the original EA (Page 4) as amended (DFFE Reference: 12/12/20/1721/1/AM8; dated 28 June 2021) as follows:

“This activity must commence within a period of sixteen (16) years and six (6) months from the date of issue of the authorisation (i.e. the EA lapses on 27 January 2028). If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.”

The 55.5 MW Springbok Wind Energy Facility was originally developed to be built and operated under the government's Renewable Energy Independent Power Producer Programme ("REIPPP"). As the REIPPP has experienced numerous and significant delays in moving forward in the last few years, it has in the past required the project developers to renew the Environmental Authorisation (EA) anticipating that the REIPPP programme would commence again in the near future, which would allow the project to be bid and eventually constructed. In 2021, the project had been assigned to a private off taker, and AM8 was granted to extend the EA beyond 10 years, by an additional 18 months. However, due to recent Eskom grid capacity constraints and the further development and commencement of construction has been suspended to a yet to be determined date.

Nonetheless, the project is still at an advanced stage of development, financing and construction contracting, with vast amounts of monies having been spent to date, including additional environmental specialist work and permitting such as rezoning (an application for which has been submitted). Furthermore, time is required to realize certain EA pre-construction conditions, such as updating the project's Environmental Management Programme (EMPr) and finalising the site layout. These processes are underway. The finalisation of the EMPr requires a number of tasks, including, for example, site visits and site walk-through surveys with certain specialists (including micro-siting), and plant search and rescue, all of which require investment and time.

Additional bird monitoring is also required and is being undertaken to ensure protection of birds and to update the bird monitoring database to be in line with current best practice guidelines. This needs to happen prior to construction, and to this extent the holder of the EA has appointed a specialist to do the additional bird data collection.

It should furthermore be noted that the EA for the project has not been lying dormant for 11 years. All specialists undertook a re-assessment of the potential environmental impacts associated with the project in 2014/2015, and again in 2017/2018, as part of the "Part 2" Application for amendment of the EA processes, the latter which was granted by the Department on 25 June 2018. No significant changes to the receiving environment have occurred since the time of the issuing of the EA, and, in light of the re-assessments undertaken in 2014/ 2015, and again in 2017/2018, the potential environmental impacts associated with the project and receiving environment are well understood.

Due to the above progress, and taking into consideration the current severe national electricity generation capacity constraints and ongoing loadshedding, the project remains valuable to the applicant, as well as to the South African energy mix, as wind farms are a vital component in the energy mix for the latest Integrated Resource Plan (IRP2019) released by the Department of Energy.

The extension of the validity period of the EA is therefore to allow the applicant more time to realize certain EA pre-construction conditions (as outlined above), and to keep the project in a construction ready state so that when Eskom capacity is available the project can be implemented. This will help to ensure the project realizes its potential to deliver clean renewable energy to the South African economy.

2. ASSESSMENT OF THE PROPOSED AMENDMENT

The reviewer has assessed the proposed amendment to the project infrastructure and has drawn the following conclusions:

2.1. The Affected Environment

The description of the affected environment, as described in the original VIA report remains unchanged. There have been no change in land use for the proposed development site, no new developments have been constructed on or near the development site, and the land use zonation (agriculture) remains the same.

The above conclusion was verified through consultation with the project proponent and the current land owner(s).

2.2. Terms of reference for the VIA

The terms of reference for the original VIA report included:

- Determine the potential visual exposure of the proposed project infrastructure
- Determine the visual distance/observer proximity to the project infrastructure
- Identify potential sensitive visual receptors and areas of higher viewer incidence
- Determine the visual absorption capacity of the landscape
- Calculate a visual impact index to identify the magnitude of the visual impact on potentially affected areas/receptors
- Determine the significance of the potential visual impact
- Provide mitigation measures to alleviate the potential visual impacts

These activities, analyses and conclusions are still relevant in light of the proposed amendment to the project infrastructure.

2.3. Impact rating assessment and impact mitigation measures

The proposed amendment to the project infrastructure is not expected to significantly alter the influence of the WEF on *areas of higher viewer incidence* (observers traveling along the roads within the region) or *potential sensitive visual receptors* (residents of homesteads in closer proximity to the facility).

The proposed amendment to the project infrastructure is consequently not expected to

influence the anticipated visual impact, as stated in the original VIA report (i.e. the visual impact is expected to occur regardless of the amendment). This statement relates specifically to the assessment of the visual impact within a 5km radius of the wind turbine structures (potentially *high* significance), but also generally apply to potentially *moderate* to *low* visual impacts at distances of up to 30km from the structures.

From a visual perspective, the proposed amendment will therefore require no (zero) changes to the significance rating within the original visual impact assessment report that was used to inform the approved EIA. In addition to this, no new mitigation measures are required.

There are no new assessment guidelines which are now relevant to the authorised development which were not undertaken as part of the initial visual impact assessment. Additional to this, and as stated above, there have been no changes to the environment of the proposed development site or the surrounding environment.

2.4. Cumulative visual impact

It is worth noting that the proposed Springbok WEF is located within the Springbok Renewable Energy Development Zone No. 8 (REDZ8) as determined by the *Strategic Environmental Assessment for Wind and Solar Photovoltaic Energy in South Africa* (2015 – CSIR/DEA).

REDZ are described as:

“areas where large scale wind and solar PV energy facilities can be developed in terms of SIP 8 and in a manner that limits significant negative impacts on the environment, while yielding the highest possible socio-economic benefits to the country.”

Source: <https://redzs.csir.co.za>

The consolidation and concentration of the wind energy facilities within this zone is therefore preferred and the cumulative visual impact is deemed to be of an acceptable level i.e. the amendment is not expected to alter the potential cumulative visual impact rating as stated in the original VIA report.

3. CONCLUSION AND RECOMMENDATIONS

The proposed amendment will require no changes to the impact significance ratings as stated within the original VIA report which was used to inform the approved EIA. In addition to this, no new mitigation measures are required.

It is suggested that the amendment to the project infrastructure be supported, subject to the conditions and recommendations as stipulated in the original EA, and according to the Environmental Management Programme (EMPr) and suggested mitigation measures, as provided in the original VIA report.

4. REFERENCES

Council for Scientific and Industrial Research (CSIR), 2015. *The Strategic Environmental Assessment for wind and solar photovoltaic energy in South Africa*.

CSIR, 2017. *Delineation of the first draft focus areas for Phase 2 of the Wind and Solar PV Strategic Environmental Assessment.*

Feel free to contact me at any time, should you have any queries.

Kind regards,

A handwritten signature in black ink, appearing to read 'L. du P.' with a stylized flourish at the end.

Lourens du Plessis (PrGISc)