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Ecological Solutions for
People & the Environment

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ATT: Candy Mahlangu
Savannah Environmental

RE: Zen Wind Farm, Western Cape - Amendment Application

The authorised Zen Wind Farm is located approximately 10km northwest of the town Gouda and falls within the Drakenstein Local Municipality in the Cape Winelands District Municipality, Western Cape. An Environmental Authorisation (EA) for the Zen Wind Farm and associated infrastructure was received on 03 November 2016. Due to the proximity to the Bergriver Wind farm and the operational Gouda Wind Farm. Acciona Energy South Africa Global (Pty) Ltd (AESAG) acquired the project from the original developers and is developing a wind farm cluster. AESAG will adopt the latest wind turbine technology available to Acciona Energy for the project. The facility layout has been designed to optimise the energy yield and considers the latest technology. The project will also utilise combined construction infrastructure (temporary facilities, laydown areas, batch plants to further reduce the overall impacts of the project and the adjacent Bergriver Wind Farm. Both the Zen and the Bergriver Wind Farm projects are designed to share infrastructure to optimise construction expenses and timeline.

In this regard, the following is proposed:

1. Retain in the overall capacity of the wind farm of up to 147MW;
2. Reduction in the number of turbines from 27 to 17;
3. Increase turbine capacity from 6 MW to up to 7.5 MW per turbine
4. Increase the internal roads width from 6m to ~8m
5. Optimise turbine/facility layout based on the energy yield, and revise the layout as required based on the revised turbine numbers and turbine specification; and
6. Optimise internal underground cabling (33kV) to enable a consolidated point of grid connection for the Zen/Bergriver cluster and remove substation and overhead power line connection from the project description.

The proposed amendments are not listed activities and do not trigger any new listed activity. No additional properties will be affected by the amendments as the proposed amendments are within the originally authorised development footprint.

As part of the above-described amendment process, Savannah Environmental has requested comment from 3Foxes Biodiversity Solutions regarding the potential terrestrial biodiversity implications of the proposed changes, which are detailed below.

Scope of the Amendment

In order to address the above proposed changes to the authorised layout of the development, this amendment statement letter provides an evaluation of the ecological impacts associated with the development with regards to the following:

1. An assessment of all impacts related to the proposed change, including a comparison with those impacts predicted in the EIA.
2. Advantages and disadvantages associated with the proposed change
3. Measures to ensure avoidance, management and mitigation of impacts associated with the proposed change
4. Any changes to the EMPr

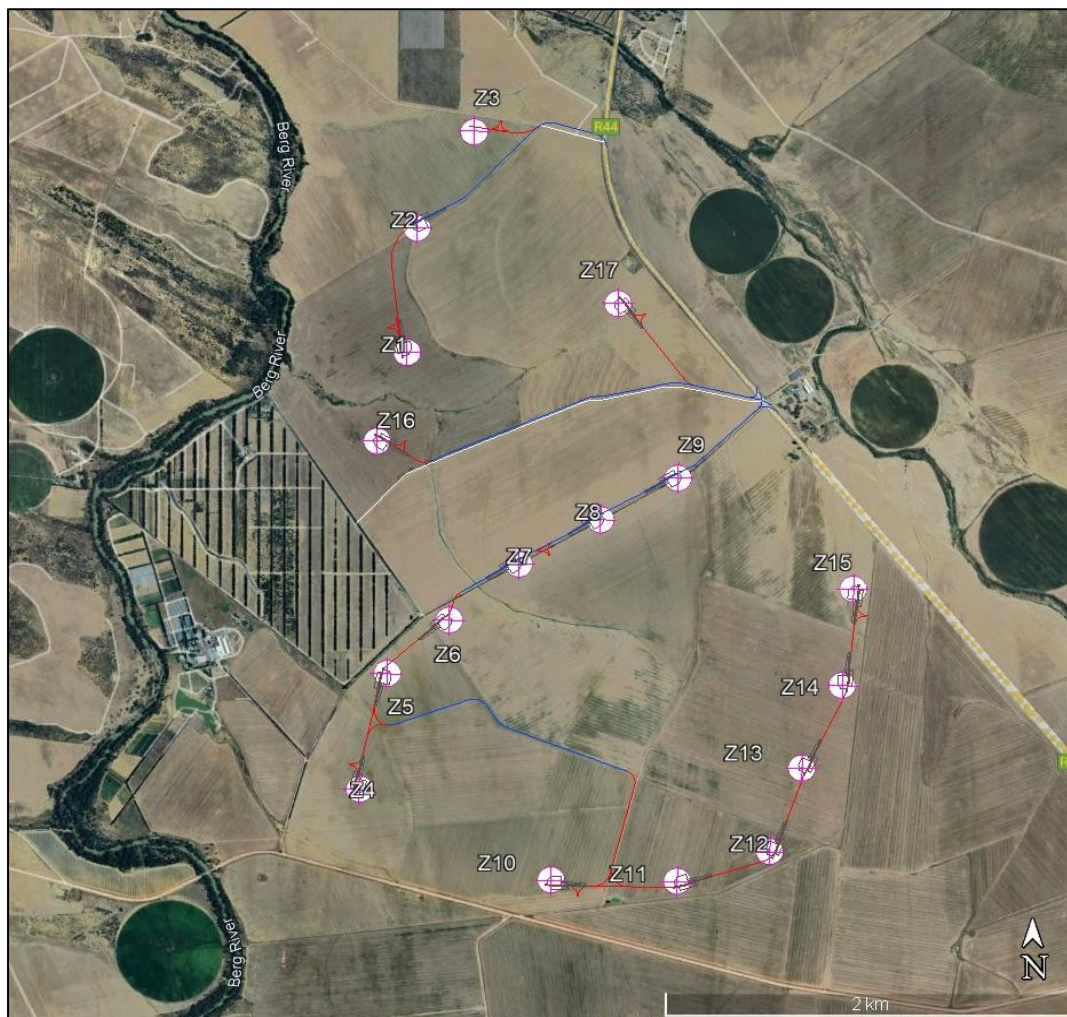


Figure 1. Map showing the amended Zen WEF layout.

1. An assessment of all impacts related to the proposed change, including a comparison with those impacts predicted in the EIA.

The amendment application for the Zen WEF includes a reduction in the number of turbines from 27 down to 17, but an increase in the road width from 6m to 8m. These would to some extent compensate for one another and the overall final footprint would decrease given that the substation has also been removed from the facility layout (the position of on-site facility substation has been optimised on the Bergriver site to enable a consolidated point of grid connection for the Zen/Bergriver wind farm cluster). The change reduces the extent of the development footprint, but remains fully within the assessed development area. No turbines are planned east of the R44 road. As such, the development would not result in an increase in the terrestrial footprint associated with the development. In addition, the project site is almost entirely transformed and the layout does not impact any potentially sensitive areas. As a result, there are no assessed differences between the current layout and the original layout as assessed within the EIA and subsequent amendments.

2. Advantages and disadvantages associated with the proposed change

The site is considered low sensitivity as it has been largely transformed, there is no infringement on remaining natural areas, and therefore there would be minimal terrestrial ecological consequence associated with the amendment application. As such there are no significant advantages or disadvantages associated with the amended layout to the remaining natural areas.

3. Measures to ensure avoidance, management and mitigation of impacts associated with the proposed change

The change to the layout is located within the original assessed development area and would not result in any new, novel or increased impacts. As such, there are no additional changes to the mitigation and avoidance measures that were recommended and in the original study. In addition, the cumulative impacts associated with the amendment are considered to be the same as those as assessed and thus there would no changes to the overall cumulative impacts associated with the changes. All of the mitigation and avoidance measures as recommended in the EIA will be applicable to the changes as considered in the amendment.

4. Any changes to the EMPr

There are no recommended changes to the EMPr and all of the mitigation and avoidance measures as recommended in the EIA are applicable to the amended facility layout.

Conclusions and Recommendations

The change in the facility layout associated with the proposed amendment to the Zen Wind Farm can be supported from an ecological point of view as the change would not generate novel impacts or increase the severity of existing impacts associated with the development. No additional mitigation

or avoidance measures, beyond those already recommended in the EIA study are required for the amendment. As such, there are no reasons to oppose the proposed amendment.

In addition, the Specialist confirms the acceptability of the amended facility layout (for submission to and approval by DFFE), and that no additions/changes to the Environmental Management Programme (EMPr) are required.

Sincerely

A handwritten signature in black ink, appearing to read 'S. Todd'.

Simon Todd

Director

3Foxes Biodiversity Solutions
