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ATTENTION: Ms Veronique Fyfe

RE: CONFIRMATION OF NO SIGNIFICANT CHANGE IN THE RISK PROFILE ASSOCIATED WITH SPLITTING THE KUDUSBERG RENEWABLE ENERGY PROJECT INTO TWO SEPARATE PROJECTS

David Hoare Consulting (Pty) Ltd has been appointed by Oya Energy (Pty) Ltd to undertake terrestrial biodiversity assessments in support of the environmental assessment and authorisation for the Kudusberg Wind Energy Facility (WEF). This includes a walk-through survey of the proposed infrastructure, for which a report has already been compiled.

Kudusberg Wind Farm (Pty) Ltd (hereafter referred to as “Kudusberg Wind Farm”) was issued with an Environmental Authorisation (EA) for the proposed construction of the 325 MW Kudusberg Wind Energy Facility (WEF) and associated infrastructure, between Matjiesfontein and Sutherland in the Western and Northern Cape Provinces (Figure 1). The EA was granted on 25 March 2019 (DEFF Reference No.: 14/12/16/3/3/1/1976 and subsequently amended on 04 April 2019 to correct a minor naming error (14/12/16/3/3/1/1976/AM1).

Kudusberg Wind Farm is now proposing to submit a Part 2 EA Amendment Application to split the authorised Kudusberg WEF (14/12/16/3/3/1/1976/AM1) into two (2) separate smaller WEF projects, namely the Kudusberg WEF and Oya WEF, which will result in a number of technical and administrative changes detailed below in Table 1. The split is being proposed to allow the projects to be suitable for numerous opportunities such as either the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), Risk Mitigation Independent Power Producer Procurement Programme (RMIPPPP), other government run procurement programmes that may arise or for sale to private entities, if enabled and/or required in the drive for energy security in South Africa.

Following the split, the northern section of the authorised WEF will become the Oya WEF (Figure 2), while the southern section of the authorised WEF will remain known as the Kudusberg WEF (authorised under 14/12/16/3/3/1/1976/AM1) (Figure 3) (Table 1). In addition to the split, the final layout for the Oya WEF is being submitted and this layout has been informed by detailed specialist walk-throughs and on-site micro-siting as per condition 29 of the Kudusberg EA¹.

¹ Condition 29 of Kudusberg EA [DEFF Ref: 14/12/16/3/3/1/1976/AM1 – Page 15 of EA (page 17 of full document)]: the final placement of turbines must follow a micro siting procedure involving a walk-through and identification of any sensitive areas by ecological, avifaunal, bat, surface water and heritage specialists.

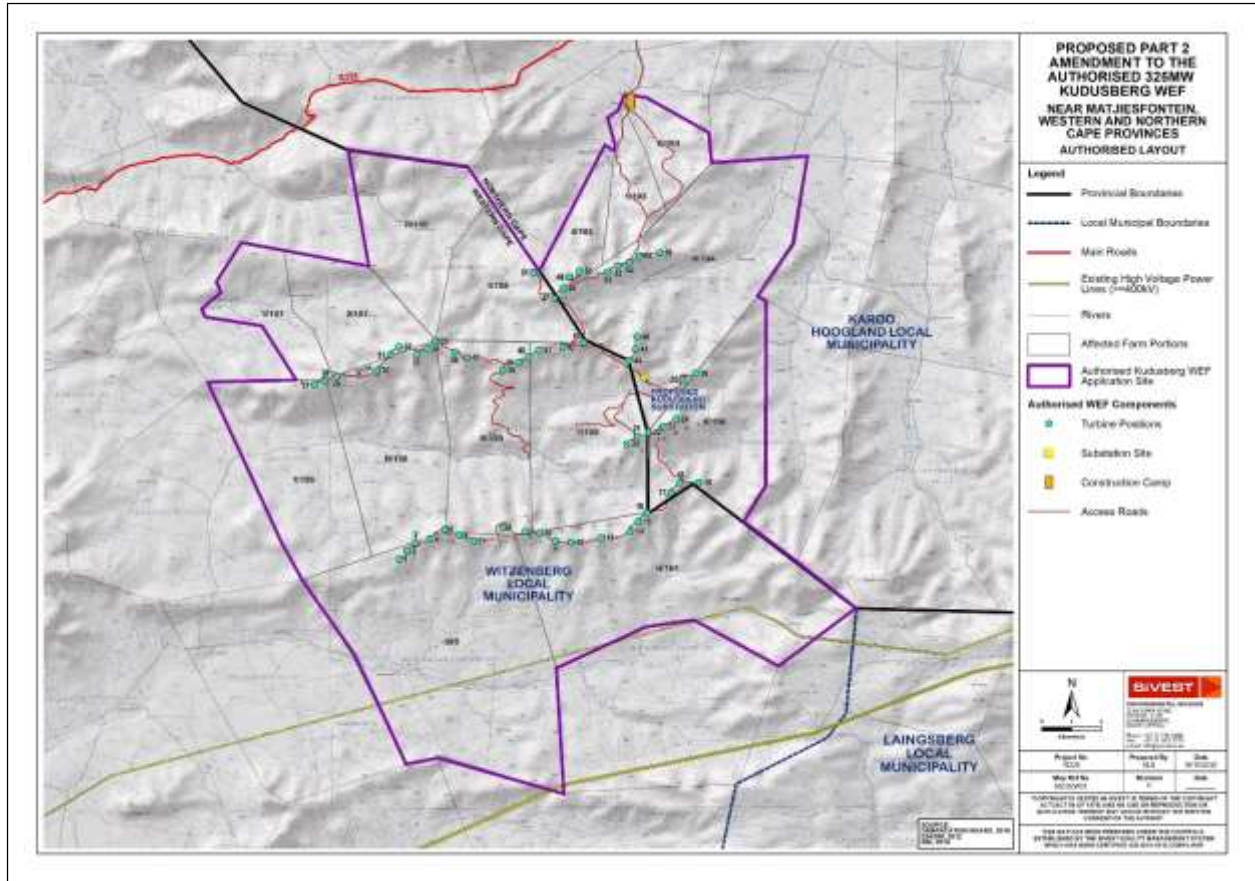


Figure 1: Layout map for authorised Kudusberg WEF (14/12/16/3/3/1/1976/AM1)

Location of Activity and SG codes:

Western Cape

1. Portion 1 of 156 Gats Rivier Farm: C01900000000015600001
2. Portion 3 of 156 Gats Rivier Farm: C01900000000015600002
3. Remainder of 156 Gats Rivier Farm: C01900000000015600000
4. Portion 1 of 157 Riet Fontein Farm: C01900000000015700001
5. Portion 1 of 158 Amandelboom Farm: C01900000000015800001
6. Remainder of 158 Amandelboom Farm: C01900000000015800000
7. Portion 1 of 159 Oliviers Berg Farm: C01900000000015900001
8. Remainder of 159 Oliviers Berg Farm: C01900000000015900000
9. Portion 2 of 157 Riet Fontein Farm: C01900000000015700002
10. Remainder of 161 Muishond Rivier Farm: C01900000000016100000
11. Remainder of 395 Klipbanks Fontein Farm: C01900000000019500000

Northern Cape

12. Portion 4 of 193 Urias Gat Farm: C07200000000019300004
13. Portion 6 of 193 Urias Gat Farm: C07200000000019300006
14. Remainder of 193 Urias Gat Farm: C07200000000019300000
15. Remainder of 194 Matjes Fontein Farm: C07200000000019400000
16. Remainder of 196 Karree Kloof Farm: C07200000000019600000

Properties affected by public road:

17. 169 Zeekoegat Farm: C07200000000016900000
18. Portion 1 of 170 Roodeheuvel Farm: C07200000000017000001
19. Remainder of 170 Roodeheuvel Farm: C07200000000017000000
20. Remainder of 190 Wind Heuvel Farm: C07200000000019000000
21. Portion 1 of 190 Wind Heuvel Farm: C07200000000019000001
22. Portion 5 of 193 Urias Gat Farm: C07200000000019300005
23. Remainder of 171 Vinke Kuil Farm: C07200000000017100000
24. Alkant Re/220 Farm: C07200000000022000000
25. Portion 1 of 174 Lange Huis Farm: C07200000000017400001

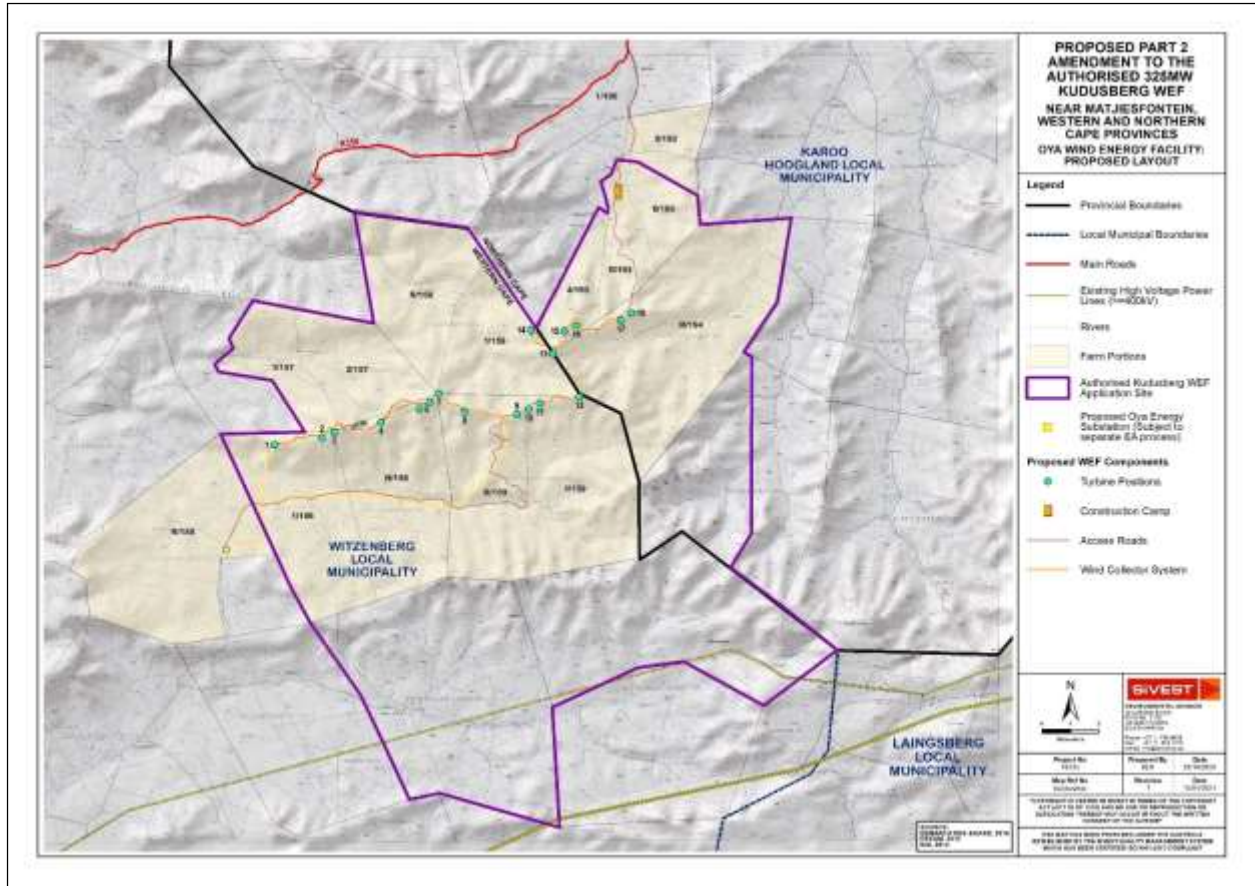


Figure 2: Layout map for proposed Oya WEF

Oya WEF: Location of Activity and SG codes:

Western Cape

1. Portion 1 of the Farm Gats Rivier No 156: C01900000000015600001
2. Portion 2 of the Farm Gats Rivier No 156: C01900000000015600002
3. Remainder of the Farm Gats Rivier No 156: C01900000000015600000
4. Portion 1 of the Farm Riet Fontein No 157: C01900000000015700001
5. Portion 2 of the Farm Riet Fontein No 157: C01900000000015700002
6. Portion 1 of the Farm Amandelboom No 158: C01900000000015800001
7. Remainder of the Farm Amandelboom No 158: C01900000000015800000
8. Portion 1 of the Farm Oliviers Berg No 159: C01900000000015900001
9. Remainder of the Farm Oliviers Berg No 159: C01900000000015900000

Northern Cape

10. Portion 4 of the Farm Urias Gat No 193: C07200000000019300004
11. Portion 6 of the Farm Urias Gat No 193: C07200000000019300006
12. Remainder of the Farm Urias Gat No 193: C07200000000019300000
13. Remainder of the Farm Matjies Fontein No 194: C07200000000019400000
14. Portion 5 of the Farm Urias Gat No 193: C07200000000019300005

Properties affected by access road:

15. Zeekoegat Farm No 169: C07200000000016900000
16. Portion 1 of the Farm Roodeheuvell No 170: C07200000000017000001
17. Remainder of the Farm Roodeheuvell No 170: C07200000000017000000
18. Remainder of the Farm Wind Heuvell No 190: C07200000000019000000
19. Portion 1 of the Farm Wind Heuvell No 190: C07200000000019000001
20. Portion 5 of the Farm Urias Gat No 193: C07200000000019300005
21. Remainder of the Farm Vinke Kuil No 171: C07200000000017100000
22. Alkant Farm No 220: C07200000000022000000
23. Portion 1 of the Farm Lange Huis No 174: C07200000000017400001
24. Remainder of the Farm Baakens Rivier No. 155: C01900000000015500000

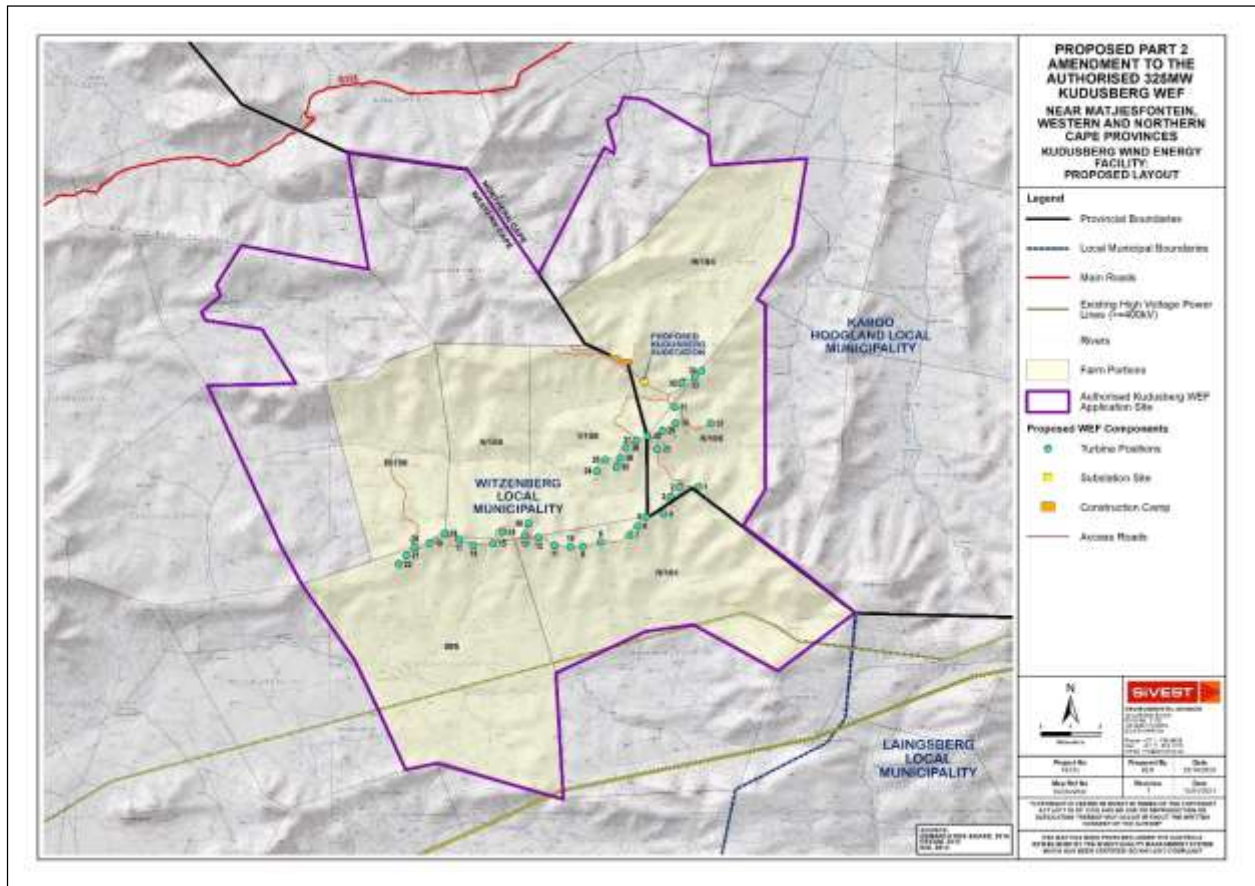


Figure 3: Layout map for proposed Kudusberg WEF

Kudusberg WEF: Location of Activity and SG codes:

Western Cape

1. Remainder of the Farm Gats Rivier No 156: C01900000000015600000
2. Portion 1 of the Farm Oliviers Berg No 159; C01900000000015900001
3. Remainder of the Farm Oliviers Berg No 159: C01900000000015900000
4. Klipbanks Fontein No 395: C01900000000039500000
5. Remainder of the Farm Muishond Rivier No 159: C01900000000016100000

Northern Cape

6. Remainder of the Farm Karee Kloof No 196: C07200000000019600000
7. Remainder of the Farm Matjes Fontein No 194: C07200000000019400000

Properties affected by public road:

8. Zeekoegat Farm No 169: C07200000000016900000
9. Portion 1 of the Farm Roodeheuvel No 170: C07200000000017000001
10. Remainder of the Farm Roodeheuvel No 170: C072000000000170000000
11. Remainder of the Farm Wind Heuvel No 190: C072000000000190000000
12. Portion 1 of the Farm Wind Heuvel No 190: C072000000000190000001
13. Portion 5 of the Farm Urias Gat No 193: C072000000000193000005
14. Remainder of the Farm Vinke Kuil No 171: C072000000000171000000
15. The Farm Alkant No 220: C07200000000022000000
16. Portion 1 of the Farm Lange Huis No 174: C07200000000017400001
17. 1/156 gatsrivier

Furthermore, the approved EMPr authorised as part of the Kudusberg EA is being amended to each WEF and to incorporate the final layout for the Oya WEF, management plans and the walk-throughs.

The following amendments are proposed for each of the two (2) WEF mentioned above (Table 1):

Table 1: Proposed amendments to the split of the Kudusberg WEF to the Oya WEF (northern ridge) and Kudusberg WEF (southern ridge).

Aspect to be amended	Authorised	Proposed Amendment	
		Oya WEF	Kudusberg WEF
Administrative Aspects			
Amend the holder of the EA's	Kudusberg Wind Farm (Pty) Ltd	Oya Energy (Pty) Ltd	Kudusberg Wind Farm (Pty) Ltd
Amend the name of the WEFs	Kudusberg Wind Energy Facility	Oya Wind Energy Facility	Kudusberg Wind Energy Facility
Contact Details	kudusberg@g7energies.com	oya@g7energies.com	kudusberg@g7energies.com
Extend the validity of the EA	This activity must commence within a period of five (05) years from the date of issue of this environmental authorization.	This activity must commence within a period of five (05) years from the date of issue of this amended environmental authorization.	This activity must commence within a period of five (05) years from the date of issue of this amended environmental authorization.
Technical Aspects			
Aspect to be amended	Authorised	Proposed Amendment	
		Oya WEF	Kudusberg WEF
Overall capacity	325MW	99MW	239MW
Number of turbines	56	18	38
Hub height	Up to 140 m	Up to 101 m above foundation	up to 140 m
Rotor diameter	Up to 180 m	Up to 158 m	Up to 180 m
Blade length	Up to 90 m	Up to 79 m	Up to 90 m
Wind measuring lattice masts	Up to 4 x 140 m high depending the final hub height.	2 x height of the hub height	2 x up to 140 m high depending the final hub height.
Layout	-	Layout submitted for final approval	Final layout to be submitted prior to the start of construction
EMPr	The EMPr submitted as part of the Application for EA is hereby approved.	Approve Final EMPr	To be submitted based on final approval of layout.

The EA amendment application does not trigger a new BA process in terms of the National Environmental Management Act (NEMA) (Act No. 107 of 1998), but as some minor adjustments to turbine locations, the final layout, road layouts and similar installations have been proposed which necessitated specialist impact statements.

A detailed Terrestrial Ecology assessment was undertaken for the authorised Kudusberg project (Ekotrust 2018) in which sensitive / "no-go" areas were identified, and an impact assessment was undertaken in which mitigation and management measures were proposed for various impacts. A detailed walk-through survey was undertaken by David Hoare Consulting (Pty) Ltd for the Oya WEF footprint area. During this survey it was possible to assess the validity of the original EIA study. This study was found to be valid and a good reflection of the anticipated impacts of the authorised project. David Hoare Consulting (Pty) Ltd has also been appointed to compile the Plant Rescue Plans for both projects, which will detail any other measures that may be required regarding protected flora, other than obtaining the necessary permits. The EMpr recommendations in the original report and Oya walk down remain valid and no additional mitigation is required. Cumulative impacts are unchanged in terms of the proposed amendment, and no additional cumulative impacts will occur.

When the original project plan for the integrated project is compared to that of the project once split into the two components, it can be concluded that the split, from a terrestrial ecological perspective, has no significant change in the risk profile from that of the original integrated project.

it is therefore recommended that the amendment be granted, subject to implementation of the above recommendations. These recommendations should be included in the Environmental Management Programme (EMPr) and the Environmental Authorisation (EA).

Yours faithfully,



Dr David Hoare
Director