



# F.E.N. Consulting

Applying science to the real world

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**Date:** Wednesday, 12 November 2020

**Ref:** FEN/G7 121120

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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 – OYA ENERGY (PTY) LTD AND KUDUSBERG WIND FARM (PTY) LTD**

FEN Consulting (Pty) Ltd has been appointed by Oya Energy (Pty) Ltd, to undertake freshwater ecological assessments in support of the environmental assessment and authorisation as well as water use authorisation processes for the Kudusberg Wind Energy Facility (WEF). This report must be read in conjunction with the Freshwater Ecological Assessment<sup>1</sup> and Site Walk Down<sup>2</sup> reports compiled by FEN Consulting.

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

<sup>1</sup> FEN Consulting. Freshwater Ecological Assessment as part of the Water Use Authorisation Process for the proposed 86 Mw Oya Wind Energy Facility (WEF) and the 239 Mw Kudusberg WEF and associated infrastructure between Sutherland and Matjiesfontein in the Western and Northern Cape Provinces. October 2020. Report reference nr: FEN 21-0045

<sup>2</sup> FEN Consulting. Freshwater Ecological Walk Down Verification as part of the Environmental Authorisation amendment process for the proposed 86 Mw Oya Wind Energy Facility (WEF) and associated infrastructure between Sutherland and Matjiesfontein in the Western and Northern Cape Provinces. November 2020. Report reference nr: FEN 21-0053

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 (Figure 1) will become the Oya WEF (Figure 2), while the southern section of the authorised WEF will remain known as the Kudusberg WEF (Figure 3) (authorised under 14/12/16/3/3/1/1976/AM1) (Table 1).

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:

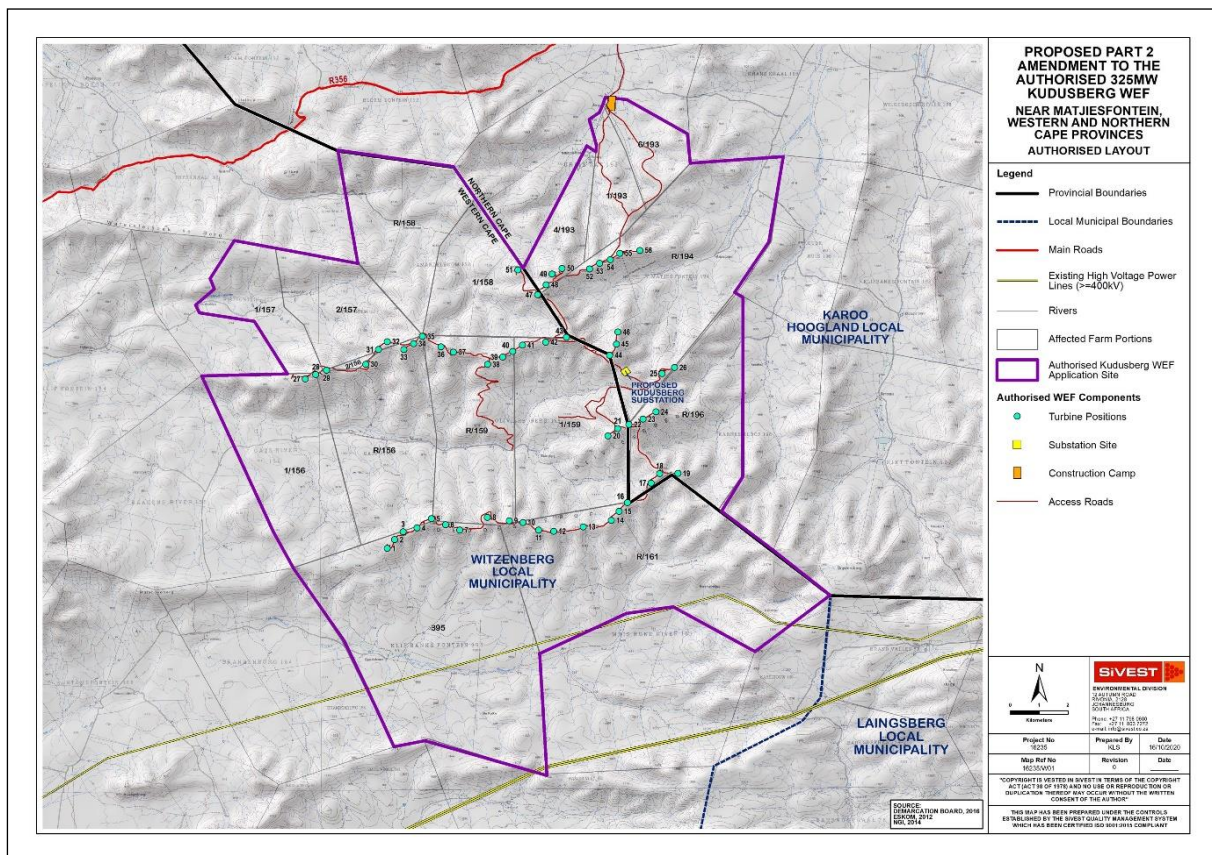


Figure 1: Layout map for authorised Kudusberg WEF (14/12/16/3/3/1/1976/AM1)



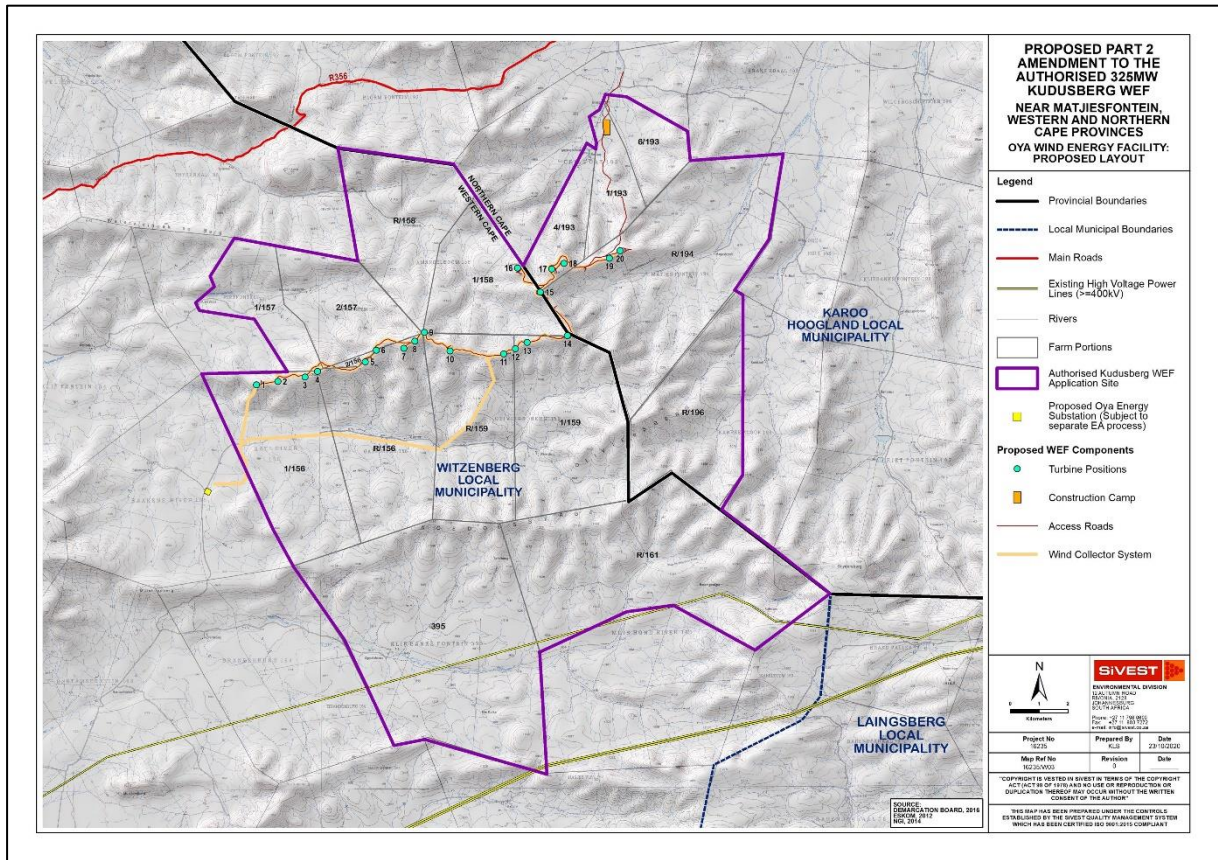


Figure 2: Proposed layout of the Oya WEF

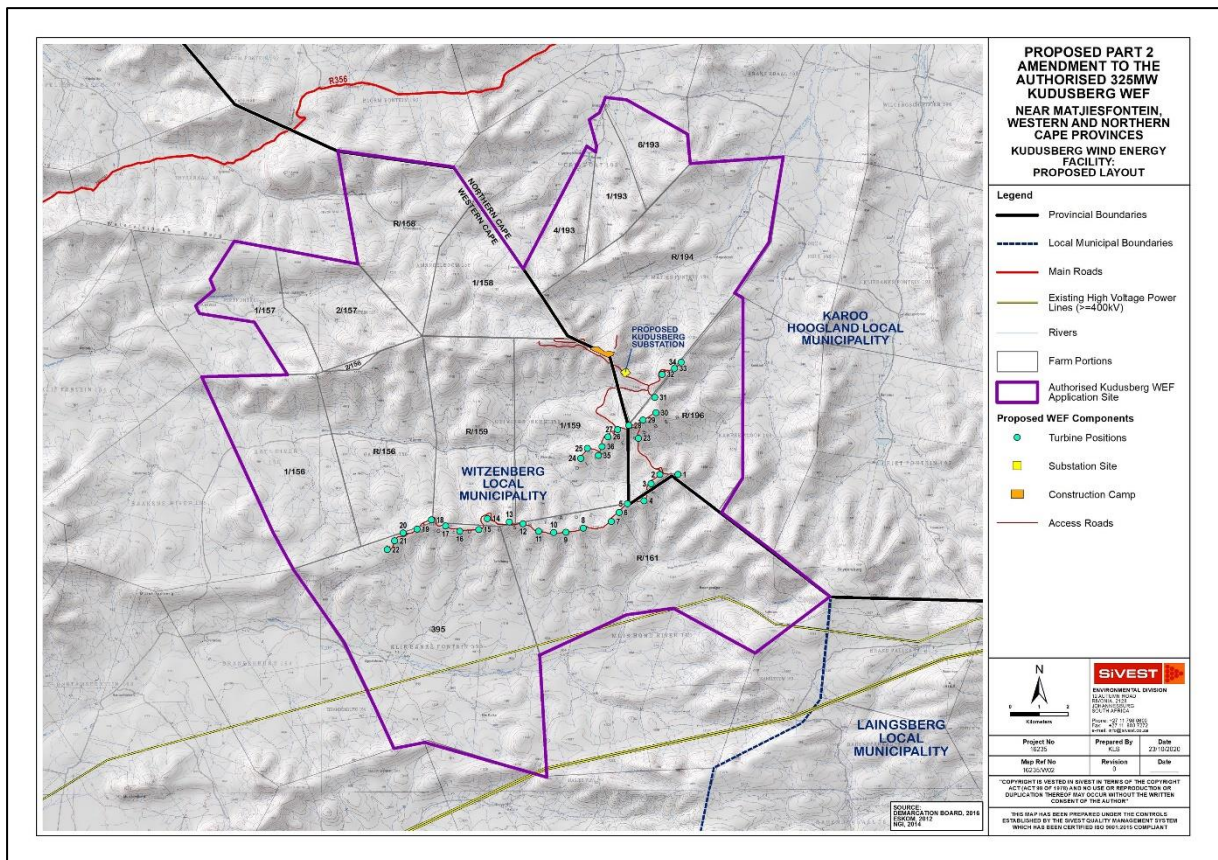


Figure 2: Proposed layout of the Kudusberg WEF

**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
<b>Administrative Aspects</b>			
<b>Amend the holder of the EA's</b>	Kudusberg Wind Farm (Pty) Ltd	Oya Energy (Pty) Ltd	Kudusberg Wind Farm (Pty) Ltd
<b>Amend the name of the WEFs</b>	Kudusberg Wind Energy Facility	Oya Wind Energy Facility	Kudusberg Wind Energy Facility
<b>Contact Details</b>	<a href="mailto:kudusberg@g7energies.com">kudusberg@g7energies.com</a>	<a href="mailto:oya@g7energies.com">oya@g7energies.com</a>	<a href="mailto:kudusberg@g7energies.com">kudusberg@g7energies.com</a>
<b>Extend the validity of the EA</b>	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.
<b>Location of Activity and SG codes</b>	<b>Western Cape</b> <ol style="list-style-type: none"> <li>1. Portion 1 of 156 Gats Rivier Farm: C019000000001560001</li> <li>2. Portion 3 of 156 Gats River Farm: C019000000001560002</li> <li>3. Remainder of 156 Gats Rivier Farm: C019000000001560000;</li> <li>4. Portion 1 of 157 Riet Fontein Farm: C0190000000015700001</li> <li>5. Portion 1 of 158 Amandelbloom Farm: C0190000000015800001</li> <li>6. Remainder of 158 Amandelboom Farm: C0190000000015800000</li> <li>7. Portion 1 of 159 Oliviers Berg Farm: C0190000000015900001</li> <li>8. Remainder of 159 Oliviers Berg Farm: C0190000000015900000</li> <li>9. Portion 2 of 157 Riet Fontein Farm: C0190000000015700002</li> <li>10. Remainder of 161 Muishond Rivier Farm: C0190000000016100000</li> <li>11. Remainder of 395 Klipbanks Fontein Farm: C0190000000019500000</li> </ol>	<b>Western Cape</b> <ol style="list-style-type: none"> <li>1. Portion 1 of the Farm Gats Rivier No 156: C019000000001560001;</li> <li>2. Portion 2 of the Farm Gats Rivier No 156: C019000000001560002;</li> <li>3. Remainder of the Farm Gats Rivier No 156: C019000000001560000;</li> <li>4. Portion 1 of the Farm Riet Fontein No 157: C019000000001570001</li> <li>5. Portion 2 of the Farm Riet Fontein No 157: C019000000001570002</li> <li>6. Portion 1 of the Farm Amandelbloom No 158: C019000000001580001</li> <li>7. Remainder of the Farm Amandelboom No 158: C019000000001580000</li> <li>8. Portion 1 of the Farm Oliviers Berg No 159: C019000000001590001</li> <li>9. Remainder of the Farm Oliviers Berg No 159: C019000000001590000</li> <li>10. Portion 4 of the Farm Urias Gat No 193: C072000000001930004</li> <li>11. Portion 6 of the Farm Urias Gat No 193: C072000000001930006</li> <li>12. Remainder of the Farm</li> </ol>	<b>Western Cape</b> <ol style="list-style-type: none"> <li>1. Remainder of the Farm Gats Rivier No 156: C019000000001560000</li> <li>2. Portion 1 of the Farm Gats Rivier No 156: C019000000001560001</li> <li>3. Portion 1 of the Farm Oliviers Berg No 159; C019000000001590001</li> <li>4. Remainder of the Farm Oliviers Berg No 159: C019000000001590000</li> <li>5. Klipbanks Fontein No 395: C019000000003950000</li> <li>6. Remainder of the Farm Muishond Rivier No 159: C019000000001610000</li> </ol> <b>Northern Cape</b> <ol style="list-style-type: none"> <li>7. Remainder of the Farm Karee Kloof No 196: C072000000001960000</li> <li>8. Remainder of the Farm Matjes Fontein No 194: C072000000001940000</li> <li>9. Portion 1 of the Farm 156 Gats Rivier</li> </ol> <b>Properties affected by access road:</b> <ol style="list-style-type: none"> <li>10. Zeekoegat Farm No 169: C0720000000016900000</li> <li>11. Portion 1 of the Farm Roodeheuvel No 170:</li> </ol>



	<p><b>Northern Cape</b></p> <p>12. Portion 4 of 193 Urias Gat Farm: C0720000000019300004</p> <p>13. Portion 6 of 193 Urias Gat Farm: C0720000000019300006</p> <p>14. Remainder of 193 Urias Gat Farm: C0720000000019300000</p> <p>15. Remainder of 194 Matjes Fontein Farm: C0720000000019400000</p> <p>16. Remainder of 196 Karree Kloof Farm: C0720000000019600000</p> <p><b>Properties affected by public road:</b></p> <p>17. 169 Zeekoegat Farm: C0720000000016900000</p> <p>18. Portion 1 of 170 Roodeheuveld Farm: C0720000000017000001</p> <p>19. Remainder of 170 Roodeheuveld Farm: C0720000000017000000</p> <p>20. Remainder of 190 Wind Heuveld Farm: C0720000000019000000</p> <p>21. Portion 1 of 190 Wind Heuveld Farm: C0720000000019000001</p> <p>22. Portion 5 of 193 Urias Gat Farm: C0720000000019300005</p> <p>23. Remainder of 171 Vinke Kuil Farm: C0720000000017100000</p> <p>24. Alkant Re/220 Farm: C0720000000022000000</p> <p>25. Portion 1 of 174 Lange Huis Farm: C0720000000017400001</p>	<p>Urias Gat No 193: C0720000000019300000</p> <p>13. Remainder of the Farm Matjes Fontein No 194: C0720000000019400000</p> <p>14. Portion 5 of the Farm Urias Gat No 193: C0720000000019300005</p> <p><b>Properties affected by access road:</b></p> <p>1. Zeekoegat Farm No 169: C0720000000016900000</p> <p>2. Portion 1 of the Farm Roodeheuveld No 170: C0720000000017000001</p> <p>3. Remainder of the Farm Roodeheuveld No 170: C0720000000017000000</p> <p>4. Remainder of the Farm Wind Heuveld No 190: C0720000000019000000</p> <p>5. Portion 1 of the Farm Wind Heuveld No 190: C0720000000019000001</p> <p>6. Portion 5 of the Farm Urias Gat No 193: C0720000000019300005</p> <p>7. Remainder of the Farm Vinke Kuil No 171: C0720000000017100000</p> <p>8. Alkant Farm No 220: C0720000000022000000</p> <p>Portion 1 of the Farm Lange Huis No 174: C0720000000017400001</p>	<p>C0720000000017000001</p> <p>12. Remainder of the Farm Roodeheuveld No 170: C0720000000017000000</p> <p>13. Remainder of the Farm Wind Heuveld No 190: C0720000000019000000</p> <p>14. Portion 1 of the Farm Wind Heuveld No 190: C0720000000019000001</p> <p>15. Portion 5 of the Farm Urias Gat No 193: C0720000000019300005</p> <p>16. Remainder of the Farm Vinke Kuil No 171: C0720000000017100000</p> <p>17. Alkant Farm No 220: C0720000000022000000</p> <p>18. Portion 1 of the Farm Lange Huis No 174: C0720000000017400001</p>
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Technical Aspects			
Aspect to be amended	Authorised	Proposed Amendment	
		Oya WEF	Kudusberg WEF
Overall capacity	325MW	86MW	239MW
Number of turbines	56	20	36
Hub height	Up to 140 m	92 m about foundation	up to 140 m
Rotor diameter	Up to 180 m	150 m	Up to 180 m
Blade length	Up to 90 m	75 m	Up to 90 m
Wind measuring lattice masts	Up to 4 x 140 m high depending the final hub height.	2 x met masts (same as hub height)	Up to 4 x 140 m high depending the final hub height.
Layout	-	Layout submitted for final approval	To be submitted prior to 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 the technical aspects of the development (such as changes to the turbine localities and watercourse road crossings) occurred, which necessitated specialist impact statements.

Freshwater assessments undertaken as part of the Kudusberg WEF & Oya WEF studies:

All freshwater ecological assessment methodologies applied to the original freshwater ecological study undertaken by FEN Consulting (2020), is still relevant to irrespective of the proposed project split. The Freshwater Ecological assessment undertaken by FEN Consulting in October 2020 reports on the freshwater environment as a whole (including reference to the Kudusberg WEF project components). The outcome of that report is still relevant, and no additional assessments are required. The site walk down assessment as reported upon by FEN Consulting in November 2020, was a follow up detailed assessment reporting on any potential sensitivities of the proposed Oya WEF. The outcome of the site walk down assessment reiterated the outcome of the freshwater ecological assessment and did not note any additional sensitivities as covered in the freshwater ecological assessment.

Specialist Impact statement

Based on the proposed amendment including the Kudusberg and Oya WEF when compared to the original Kudusberg WEF project (as reported upon in FEN Consulting, 2020) as summarised in Table 1, the proposed project split is not considered to pose any change in impact/risk significance to the identified and assessed watercourses. As such, no advantages or disadvantages (when considering the authorised specifications, versus the proposed specifications – Table 1) can be identified from a freshwater ecological perspective. 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 freshwater ecological perspective, has no significant change in the risk profile from that of the original integrated project. It is noted that the proposed project split will entail application for authorisation for each WEF development separately, however the specialist freshwater ecological assessment of FEN Consulting (2020) is considered sufficient to inform this process, and no additional studies is considered to be required. The cumulative impacts of the combined project development versus splitting of the project into two separate projects is considered unchanged, and no additional cumulative impacts are expected.

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 sincerely,



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Mr Stephen van Staden  
Group CEO and Water Resource Discipline Lead