

**KARREEBOSCH WIND ENERGY FACILITY, NORTHERN AND WESTERN CAPE PROVINCE
COMMENTS AND RESPONSES REPORT**

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LIST OF ABBREVIATIONS / ACRONYMS

SAHRA	South African Heritage Resource Agency	DEA	Department of Environmental Affairs
SAHRIS	South African Heritage Resource Information System	EMPr	Environmental Management Programme
EIA	Environmental Impact Assessment	CD	Compact Disc
DEA&DP	Department of Environmental Affairs & Development Planning	EA	Environmental Authorisation
WEF	Wind Energy Facility	I&AP	Interested and Affected Party

COMMENTS RECEIVED FROM ORGANS OF STATE DEPARTMENTS

NO.	COMMENT	RAISED BY	RESPONSE
1.	1. The above matter refers.	Serame Motlhake	Karreebosch Wind Farm (Pty) Ltd wish to clarify that the application was submitted for a wind farm and not a solar PV facility.
1.1	2. We wish to advise that SENTECH SOC Ltd ("SENTECH") has received an application from Karreebosch Wind Farm (Pty) Ltd ("the applicant"), which plans to construct one solar PV facility as described in annexure 1 hereto, at the Karreebosch Wind Farm, hereafter referred to as "the site", in accordance with the provisions of Section 29(1) (b) of the Electronic Communications Act no. 3 of 2005 ("the Act").	SENTECH SOC Ltd Letter: 01-08-2018	Sentech's requirements and approval are acknowledged. The additional requirements shall be included within the Final EMPr prior to submitting the final layout to DEA for approval in the future.
1.2	3. SENTECH has analysed the information provided by the applicant in accordance with the provisions of Section 29(1)(c) of the Act, and specifically the location of the site and confirm that there would be limited degradation of SENTECH transmitted Terrestrial UHF/VHF Television (TV), and/or FM radio services in the planned deployment area, as indicated in annexure 1.		
1.3	4. SENTECH hereby grants the applicant approval to proceed with the construction of its energy project at the site subject to the following terms and conditions:		
1.4	4.1. Due to the fact that the findings made by SENTECH are based on simulations and calculated on a theoretical model, using available data and assumptions where no data was provided, such findings may change at any time should further information be made available to r come to SENTECH's attention;		
1.5	4.2. At any time after the approval, and during construction of the project, should ant radio transmissions be affected by construction activities, SENTECH will give the applicant 7 (seven) day's written notice to remove the cause of the interference.		

1.6	4.3. Under no circumstances whatsoever will SENTECH be liable to the applicant or any third party for any damages, loss or costs, of any nature whatsoever or howsoever arising, suffered as a consequence of the abovementioned request and the applicant fully indemnify SENTECH;		
1.7	4.4. SENTECH prior written consent must first be obtained before any construction activities underneath, along, across or within close proximity to SENTECH infrastructure can begin and shall comply with the applicable SENTECH guidelines relating to clearances between equipment and the proposed construction activity. Furthermore, the applicant shall clearly adhere to, and ensure all installations shall be fully compliant with the Occupational health and Safety Act No. 85 of 1993.		
1.8	5. This approval is further subject to the submitted applications boundaries or structures listed in annexure 1 hereto, the materials used, as well as the size and positioning of structures declared in the application. If the services of SENTECH or its clients is in any way compromised by a deviation or change of this submission, the applicant shall be liable for all costs to re-establish, or relocate the services, and under no circumstances whatsoever will SENTECH be liable to the applicant or any other third party for damages, loss or costs, of any nature whatsoever or howsoever arising, suffered as a consequence.		
1.9	6. This approval is valid and applicable between SENTECH and the applicant only. It does not include any approval for any of the other electronic communication operators which have current co-sharing agreements to utilize SENTECH's radio masts.		

1.10	7. Any additions, amendments, additional structures to be built, or any change to the energy farm boundaries, will require a new application to SENTECH.		
1.11	8. The validity of this approval is for a period of 12 (twelve) months. If construction of the designed project commences after the expiry of the twelve-month period, the application must be re-submitted to SENTECH for further evaluation and approval.		
1.12	9. This approval does not imply any rights of access whatsoever to SENTECH property or use of SENTECH's access roads for construction or maintenance of the design project. Separate permission must be obtained from SENTECH in this regard. Furthermore, SENTECH reserves the right to claim damages in terms of Section 29 of the Act, for any loss or damages sustained as a result of damages to any of SENTECH's electronic broadcast and communications infrastructure.		
1.13	10. The applicant shall, in carrying out any work or project, take all the necessary precautions for the safety of SENTECH's employees, contractors, representatives and its property, including the radio transmitters and links on or near the site against damages as a result of construction of the applicant's energy project.		
1.14	11. The applicant shall be liable for all and any direct and/or indirect, and/or consequential damages or injury that may be caused by the applicant, its contractors, subcontractors, employees, agents or representatives to any employee, contractor representative or property of SENTECH including radio network transmitters and/or links or land which may have been disturbed shall be restored to the same condition in which it was before commencement of the construction of the energy project.		

1.15	<p>12. In no event will SENTECH, its employees, contractors, or representatives be liable to the applicant or any third party whatsoever for special, collateral, exemplary, direct, indirect, incidental, consequential or any other damages of any nature whatsoever or howsoever arising (including without limitation, loss of goodwill, loss of profits or revenues, loss of savings, loss of use, interruptions or noisiness, or injury) whether or not such damages or injury occurred prior or subsequent to, or are alleged as a result of any SENTECH radio network approved and/or not approved in terms of this letter, even if SENTECH has been advised of the possibility of such damages or injury</p> <p>All SENTECH rights are fully reserved.</p>		
1.16	<p><u>ANNEXURE 1</u> The planned Karreebosch Wind Farm will be located ± 51 km north of Matjiesfontein (C12) transmitter station. The WTG facility will be located in the of the coverage areas of the transmitter station.</p>		
1.17	<p>Conclusion on the results and findings of the planned 46 total amount of WTG's can be summarised as follows:</p> <ol style="list-style-type: none"> 1. No interference on analogue VHF/UHF TV services in the Matjiesfontein residential areas; 2. No interference on DTT services in Matjiesfontein residential areas; 3. No interference on FM services will experienced and, 4. None of the existing FM RBR broadcast feeds in the above-mentioned area will be affected. 		
2.	<p>i. This Department further requests that you submit the final site layout plan for the proposed amendments which will address the issue raised in Condition 35 on page 18 of the approved EA</p>	<p>Sabelo Malaze Chief Director: Integrated Environmental Authorisations</p>	<p>i. The removal of wind turbine position 17 has been undertaken and shown in the updated layout plan provided in Chapter 2 – Figure 2.2 and Appendix F of the Motivation Report. Note that the updated layout plan is not the final layout plan. A final layout plan and Final EMPr will</p>

		DEA Letter: 14-08-2018	therefore need to be submitted for final approval to the DEA once available in line with condition 16 and 18 respectively of the environmental authorisation dated 29 January 2016.
2.1	ii. Please ensure that all issues raised and comments received during the circulation of the application for amendment from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final amendment report.		ii. All issues raised and comments received during the circulation of the application for amendment from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity have been adequately addressed and can be found in Section 7 and Appendix E4 of the Final Motivation Report.
2.2	iii. Proof of correspondence with the various stakeholders must be included in the application for amendment. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulations 39, 40,41,42,43 and 44 of the EIA Regulations 2014 and proof of compliance such as newspaper adverts, site notice etc. are to be included in the final Report.		iii. The proofs of correspondence with the various stakeholders have been included in Appendix E2 in the Final Motivation Report. Where it was unable to obtain comments for the various stakeholders, proof of attempts made to obtain comments have been included in Appendix E5 of the Final Motivation Report. Furthermore, it is confirmed that the public participation process has been conducted in terms of Regulations 39, 40, 41, 42, 43 and 44 of the EIA Regulations, and proof of compliance such as newspaper adverts, site notices have been included in Appendix E3 of the Final Motivation Report.
2.3	iv. The adverts that were published in Die Burger (provincial newspaper) and Die Noordwester Uitgewers (local newspapers) on the 01 and 03 August 2018 respectively (referred to Appendix E2), must form part of the final report.		iv. The adverts that were published in <i>Die Burger</i> (provincial newspaper) and <i>Die Noordwester Uitgewers</i> (local newspapers) on the 01 and 03 August 2018 respectively within Appendix E3 of the Final Motivation Report.
2.4	v. The Environmental Management Programme (EMPr) must be amended to include additional information resulting from the amendment and measures as directed by the final site lay-out map and micro-siting, and the provisions of the environmental authorisation.		v. No additional mitigation measures have been proposed by any of the specialists as per the findings in Section 4 of the Final Motivation Report. The additional requirements from Sentech will be included in the final EMPr to be submitted to the DEA for approval in accordance with condition 18 of the Environmental Authorisation dated 29 January 2016. In addition, the updated layout provided as part of this amendment

			<p>application is not the final layout plan. A final layout plan will need to be submitted for final approval to the DEA once available. In consideration of this, the EMPr has not yet been approved as per Condition 18 of the Environmental Authorisation dated 29 January 2016. It has therefore been recommended by the EAP that the Environmental Management Programme (EMPr) be amended and submitted for final approval once the final layout is available.</p>
2.5	You are requested to submit a copy of the final Amendment Report to the Department and at least one unprotected electronic copy (CD) of the complete final report with the hard copy documents.		<p>A CD (electronic copy) and hard copy of the report will be submitted to the Department</p>
2.6	Should you fail to meet any of the timeframes stipulated in regulation 32 of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014, as amended, your application will lapse.		
2.7	Further note that in terms of Regulations 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of the these regulations, unless an extension has been granted in terms of Regulation 3(7)		
2.8	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1996, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.		
3.	Eskom requirements for work at or near Eskom infrastructure.	John Geeringh Senior Consultant Environmental Management	
3.1	Eskom's rights and services must be acknowledged and respected at all times.	Eskom Letter 04-09-2018	<p>Eskom's requirements are acknowledged. The additional requirements shall be included within the Final EMPr prior to submitting the final layout to DEA for approval in the future.</p>

3.1	Eskom shall at all times retain unobstructed access to and egress from its servitudes.		
3.2	Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.		
3.3	Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.		
3.4	If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.		
3.5	The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.		
3.6	Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.		

3.7	<p>Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.</p>		
3.8	<p>No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager</p>		
3.9	<p>Note: Where and electrical outage is required, at least fourteen work days are required to arrange it.</p>		
3.10	<p>Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.</p>		
3.11	<p>Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area.</p>		

	The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.		
3.12	The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993).		
3.13	Equipment shall be regarded electrically live and therefore dangerous at all times.		
3.14	In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.		
3.15	Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.		
3.16	It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.		
3.17	Any third-party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third		

	<p>party's servitude deed must also include the rights of the affected Eskom servitude.</p>																	
<p>4.</p>	<p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.</p> <p>Given that the amendment is required in order to change technical aspects of the turbine specifications, it is deemed that there are no major additional environmental impacts other than those already evaluated in the environmental assessment associated with the development application as authorised.</p> <p>The following table was extracted from the documentation supplied by the consultant illustrates the proposed amendment application request:</p> <table border="1" data-bbox="174 778 804 874"> <thead> <tr> <th></th> <th>Authorised turbine specification</th> <th>Amended turbine specifications</th> </tr> </thead> <tbody> <tr> <td>Wind Turbine Generation Capacity</td> <td>2MW to 3.3MW</td> <td>2MW to 5.5MW</td> </tr> <tr> <td>Rotor Diameter</td> <td>140m</td> <td>160m</td> </tr> <tr> <td>Hub Height</td> <td>100m</td> <td>125m</td> </tr> <tr> <td>Blade Length</td> <td>70m</td> <td>80m</td> </tr> </tbody> </table> <p>In addition to which, the location of the various turbines and infrastructure has not changed and only the holder of the Environmental Authorisation details are changing. It is noted that no additional Listed Activities will be triggered by the proposed amendments.</p> <p>The Avifaunal Impact Assessment and the Bat Impact Assessments have been revised accordingly, both finding in favour of the proposed changes.</p> <p>Since the Environmental Authorisation was granted, the Western Cape Biodiversity Spatial Plan (WCBSP 2017)¹ and its associated Land Use Advice (LUA) Handbook (Pool-Stanvliet et al. 2017)² have been published. It is therefore recommended these documents/maps be</p>		Authorised turbine specification	Amended turbine specifications	Wind Turbine Generation Capacity	2MW to 3.3MW	2MW to 5.5MW	Rotor Diameter	140m	160m	Hub Height	100m	125m	Blade Length	70m	80m	<p>Colin Fordham Manager: Scientific Services</p> <p>CapeNature</p> <p>Letter: 06-09-2018</p>	<p>Cape Nature's recommendation is acknowledged. No update of the assessment has been deemed necessary for the specialist amendment reports submitted for the amendment application.</p>
	Authorised turbine specification	Amended turbine specifications																
Wind Turbine Generation Capacity	2MW to 3.3MW	2MW to 5.5MW																
Rotor Diameter	140m	160m																
Hub Height	100m	125m																
Blade Length	70m	80m																

	<p>referenced accordingly and all relevant sections of the various reports be updated where necessary. These documents/maps are particularly relevant to the impact assessment sections of these reports and are current considered best available science in the field of conservation planning for the Western Cape.</p> <p>Given the above CapeNature does not object to the proposed amendment application. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>		
5.	<p>Unfortunately, I will not be able to as I still don't have the documents. They were sent to Cape Town and to the wrong persons in the Department.</p> <p>For future reference, kindly send all correspondence regarding any projects in the Eden and Central Karoo region to this office for the attention of Danie Swanepoel at Danie.Swanepoel@westerncape.gov.za</p>	<p>Jessica Christie Directorate Development Management (Region 3)</p> <p>DEA&DP</p> <p>Email: 06-09-2018</p>	<p>Thank you for the information provided. Going forward we will be sure to send it to the correct official as indicated. Please see Appendix E3 for proof of notification of report to the DEA&DP on 17 September 2018.</p>
6.	<p>Savannah Environmental (Pty) Ltd has been appointed by Karreebosch Wind Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application process for the authorised Karreebosch Wind Farm, near Sutherland, Northern Cape Province (DEA Ref: 14/12/16/3/3/2/807). A draft Motivation for Amendment Report has been submitted in terms of the National Environmental Management Act, No 107 of 1998 (NEMA) and the NEMA 2017 Environmental Impact Assessment (EIA) Regulations. The proposed amendments include the following:</p>	<p>Natasha Higgitt Heritage Officer</p> <p>SARHA</p> <p>Letter: 26-09-2018</p>	<p>Please note that the proposed amendments are for a range of rotor, hub height and blade lengths as follows:</p> <ul style="list-style-type: none"> • Wind turbine generation capacity from 2MW – 3.3MW to 2MW – 5.5MW; • Rotor diameter from 140 m to <u>up to</u> 160 m; • Hub height from 100 m to <u>up to</u> 125 m; • Blade length from 70 m to <u>up to</u> 80 m; • Wind measuring mast height from 100 m to <u>up to</u> 125 m; • Change in contact details of the holder of the authorisation. <p>We can confirm that no changes are proposed to the physical layout.</p>

	<ul style="list-style-type: none"> • Wind turbine generation capacity from 2MW – 3.3MW to 2MW – 5.5MW; • Rotor diameter from 140 m to 160 m; • Hub height from 100 m to 125 m; • Blade length from 70 m to 80 m; • Wind measuring mast height from 100 m to 125 m; • Change in contact details of the holder of the authorisation. 		
6.1	No proposed amendment to the physical layout and footprint is being requested.		
6.2	<p>In a Final Comment issued on SAHRIS Case ID 4503 (https://www.sahra.org.za/sahris/cases/roggeveld-wind-farm-phase-1), SAHRA stated that Turbines 28 and 29 would need to be removed from the footprint, which was supported in the EA submitted to the case, however the EA Reference number (DEA Ref: 12/12/20/1988/1) differs from the current application i.e. before the original Roggeveld WEF was split into three phases (Karreebosch is phase 2 of the Roggeveld WEF. See Case ID 473 https://www.sahra.org.za/sahris/cases/roggeveld-wind-farm) and EIA in Case ID 6884 https://www.sahra.org.za/sahris/cases/karreebosch-roggeveld-phase-2-wind-farm).</p>		Please note that the Karreebosch wind farm was authorised in EA with reference number: 14/12/16/3/3/2/807
6.3	<p>Final Comment</p> <p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the proposed amendment and is satisfied that the proposed changes to the project will not impact significant heritage resources. The comments provided in the Final Comment for Case ID 4503 with regards to turbines 28 and 29 are still valid and must be adhered to. The following additional conditions must be included in the Environmental Management</p>		The comments provided in the Final Comment for Case ID 4503 with regards to turbines 28 and 29 are related to the Roggeveld Wind Farm Phase 1 (DEA Reference: 12/12/20/1988/1; SAHRIS Case ID: 4503) project and is unrelated to the Karreebosch Wind Farm project (DEA Reference: 14/12/16/3/3/2/807; SAHRIS Case ID: 7379) to which the proposed amendment application is related to. This comment is therefore not related to this project.

	Programme (EMPr):		
6.4	<ul style="list-style-type: none"> The final Amendment Report must be submitted to the SAHRIS Case application for record purposes; 		The final amendment report will be uploaded to the SAHRIS as requested.
6.5	<ul style="list-style-type: none"> The condition provided in SAHRIS Case ID 473 with regards to the 3 km buffer from the R354 for the original Roggeveld WEF is amended to 1 km so that Phase 2 (Karreebosch) is aligned with the condition provided for Phase 1 of the project as per the Final Comment issued on SAHRIS Case ID 4503; 		The 1km buffer applicable to Karreebosch Wind Farm is acknowledged and adhered to.
6.6	<ul style="list-style-type: none"> If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA; 		This mitigation measure will be included in the Final Environmental Management Programme (EMPR) which will be submitted to the DEA for final approval once available.
6.7	<ul style="list-style-type: none"> Should the project be granted the amended Environmental Authorisation, SAHRA must be notified and all relevant documents submitted to the case file. 		SAHRA will be notified accordingly, and the relevant documents will be uploaded to the case file.

	Should you have any further queries, please contact the designated official using the case number quoted above in the case header.		
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CONSULTATION WITH ORGAN OF STATE DEPARTMENTS

NO.	COMMENT	RAISED BY	RESPONSE
1.	It seems there will not be any impact on our infrastructure. What is the plan for connection to the Grid?	John Geeringh Senior Consultant Environmental Management Eskom Email: 04-09-2018	The power line will remain as per the description and maps in the EIA as well as that authorised in the EA which approves approx. 25km of 132kV powerlines from the on-site substation at Karreebosch WEF to Eskom Komsberg Substation.

GENERAL

NO.	COMMENT	RAISED BY	RESPONSE
1.	Please could you put me on the notification list for the Karreebosch WEF.	Magdalena Michalowska Building Energy Email: 01-08-2018	It is confirmed that Magdalena Michalowska of Building Energy has been registered as an I&AP on the project's database on 1 August 2018.