

**Environmental Impact Assessment for the
proposed Banna Ba Pifhu Wind Energy Project
near Humansdorp, Eastern Cape:
Draft Environmental Impact Assessment Report**

Chapter 4:

Approach to the EIA



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CHAPTER 4. APPROACH TO THE EIA

This chapter presents the approach to the impact assessment phase of the EIA process, including public participation. For information on the approach to Scoping, including the relevant legislation, key principles and guidelines that provide the context for this EIA process, refer to the Final Scoping Report (CSIR, 2011).

4.1 IDENTIFICATION OF ISSUES

The DEA *General Guide to the EIA Regulations* (Guideline 3, 2006) states that when the competent authority has accepted the Final Scoping Report and Plan of Study for EIA (PSEIA), the EIA phase may commence. The purpose of the EIA phase is to:

- Address issues that have been raised through the Scoping Process;
- Assess alternatives to the proposed activity in a comparative manner;
- Assess all identified impacts and determine the significance of each impact; and
- Formulate mitigation measures.

The EIA phase consists of three parallel and overlapping processes:

- Central assessment process involving the authorities where inputs are integrated and presented in documents that are submitted for approval by authorities (Section 4.5);
- Public participation process whereby findings of the EIA phase are communicated and discussed with I&APs and responses are documented (Section 4.3); and
- Specialist studies that provide additional information required to address the issues raised in the Scoping phase (Sections 4.6 and 4.7).

4.2 OVERVIEW OF APPROACH TO PREPARING THE EIA REPORT AND EMP

The results of the specialist studies and other relevant project information have been summarized and integrated into the Draft EIA Report. The Draft EIA Report will be released for a 40-day I&AP and authority review period, as outlined in Section 4.3. All I&APs on the project database will be notified in writing of the release of the Draft EIA for review. It is proposed that during this review period a public meeting is held as well as focus group meetings with key I&APs. The purpose of these meetings will be to provide an overview of the outcome and recommendations from the specialist studies, as well as provide opportunity for comment. Comments raised through written correspondence (emails, comments, forms) and at meetings (public meeting and focus group meetings) will be captured in a Comments and Responses Trail for inclusion in the Final EIA Report. Comments raised will be responded to by the CSIR EIA team and/or the applicant. These responses will indicate how the issue has been dealt with in the EIA process. Should the comment received fall beyond the scope of this EIA, clear reasoning will be provided. All comments received will be attached as an appendix to the Final EIA Report.

The Draft EIA Report includes a draft Environmental Management Plan (EMP), which was prepared in compliance with the relevant regulations. This EMP is based broadly on the environmental management philosophy presented in the ISO 14001 standard, which embodies an approach of continual improvement. Actions in the EMP were drawn primarily from the management actions in the specialist studies for the construction and operational phases of the project. If the project components are decommissioned or re-developed, this will need to be done in accordance with the relevant environmental standards and clean-up/remediation requirements applicable at the time.

An overview of the approach to the EIA process is provided in Figure 4.1.

4.3 PUBLIC PARTICIPATION PROCESS

The key steps in the public participation process for the EIA phase are described below. This approach has been accepted by DEA through their approval of the PSEIA (letter from DEA dated 22 February 2012, see Appendix B). For background on the public participation during the Scoping Phase, refer to Chapter 4 of the Final Scoping Report.

Task 1: Review of Draft EIA Report and EMP

The first stage in the process will entail the release of the Draft EIA Report for a 40-day public and authority review period. Relevant organs of state and I&APs will be informed of the review process in the following manner:

- Advertisements placed in one local and one regional newspaper, e.g. EP Herald and Our Times, advertising the availability of the Draft EIA report for review as well as providing details of the public meeting to be held;
- Letter 4 to all I&APs (including authorities), with notification of the 40-day public review period for the Draft EIA and invitation to attend the public meeting (this letter will include the summary of the Draft EIA Report and a Comment Form);
- Public Meeting on the Draft EIA Report, where key findings of the EIA report will be communicated and I&APs will have the opportunity to provide comments and engage with the EIA team and project proponent;
- Focus Group Meeting(s) with I&APs, if requested; and
- Meeting(s) with key authorities involved in decision-making for this EIA, if requested.

The Draft EIA Report and EMP will be made available and distributed through the following mechanisms to ensure access to information on the project and to communicate the outcome of specialist studies:

- Copies of the report will be placed at the Jeffrey's Bay and Humansdorp Municipal Libraries;
- Relevant organs of state and key I&APs will be provided with a hard copy and/or CD version of the report;
- Report to be placed on the project website: www.publicprocess.co.za

The project database is regularly updated as and when information is sent to or received from I&APs. At the conclusion of the Scoping Process the project database included 59 registered I&APs. Subsequent to the submission of the Final Scoping Report, comments have been received from I&APs. The database has been amended accordingly and now **includes 64 registered I&APs**. A copy of the project database is included as Appendix C of this report.

Task 2: Comments and Responses Trail

A key component of the EIA process is documenting and responding to the comments received from I&APs and the authorities. Subsequent to the submission of the Final Scoping Report to DEA and prior to the release of the Draft EIA, comments have been received from I&APs. These comments are captured in the Comments and Responses Trail of Appendix D of this report. Copies of the comments received are included in Appendix E. Letter 3 to I&APs regarding notification of submission of the Final Scoping Report is included in Appendix F.

During the Review of the Draft EIA Report and EMP, the following comments will be documented:

- Written and email comments (e.g. letters and completed comment forms);
- Comments made at public meetings;
- Comments made at focus group meetings;
- Telephonic communication with public consultation contact person (Public Process Consultants); and
- One on one meetings with key authorities and/or I&APs.

The comments received will be compiled into an updated Comments and Responses Trail for inclusion in the Final EIA Report. The Comments and Responses trail will indicate the nature of the comment, when and who raised the comment. The comments received will be considered by the EIA team and appropriate responses provided by the relevant member of the team and/or specialist. The response provided will indicate how the comment received has been considered in the Final EIA Report, in the project design or EMP for the project.

Task 3: Compilation of Final EIA Report for submission to Authorities

The Final EIA Report, including the Comments and Responses Trail and EMP, will be submitted to the authorities for decision making. Letter 5 will be sent to all I&APs on the project database notifying them of the submission of the final report. The Final EIA Report will be distributed as follows:

- Copies of the report will be placed at the Jeffrey's Bay and Humansdorp Municipal Libraries;
- Relevant organs of state and key I&APs will be provided with a hard copy and/or CD version of the report; and
- Report to be placed on the project website www.publicprocess.co.za.



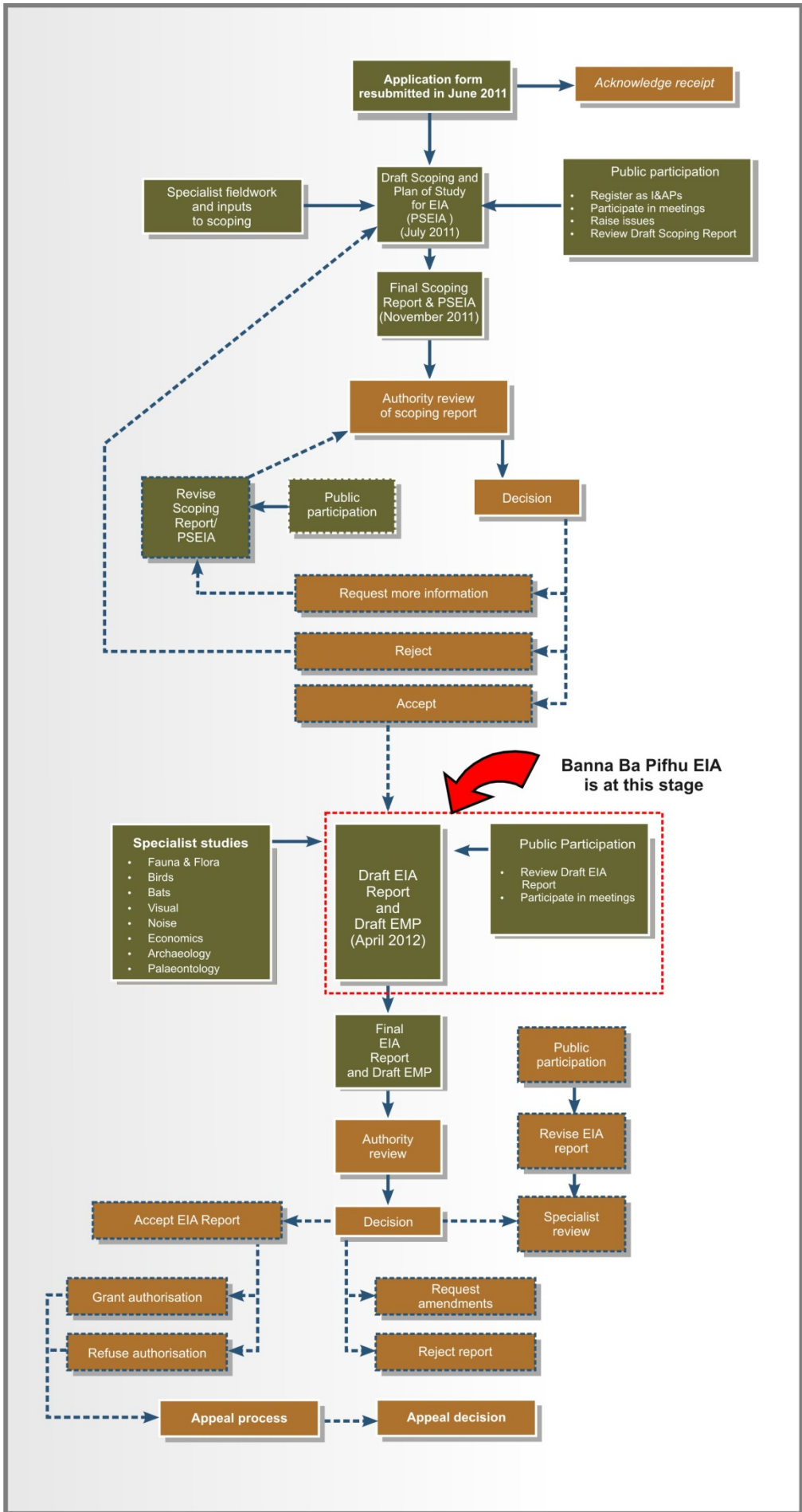


Figure 4.1: EIA process for the Banna Ba Pifhu project

Task 4: Environmental Authorisation and Appeal Period

All I&APs on the project database will be notified of the issuing of the Environmental Authorisation and the Appeal period. The following process will be followed for the distribution of Environmental Authorisation and notification of the appeal period:

- Copies of the Environmental Decision will be placed at the Jeffrey's Bay and Humansdorp Municipal Libraries;
- Letter 6 to be sent to all I&APs (including organs of state), with notification on the availability of the Environmental Decision and information on the Appeal Period;
- Environmental Decision to be placed on the project website; and
- Advertisements to be placed in two local newspaper advertising the issuing of the environmental authorisation.

All I&APs on the project database will be notified of the outcome of the appeal period, this notification will be included in Letter 7 to I&APs.

4.4 AUTHORITY CONSULTATION DURING THE EIA PHASE

Authority consultation is integrated into the public consultation process, with additional one-on-one meetings held with the lead authorities where necessary. The authority consultation process for the EIA Process is outlined in Table 4.1 below.

Table 4.1. Authority consultation schedule for the EIA phase

Stage in EIA Phase	Form of Consultation (including provisional dates)
During Scoping phase	Ad hoc communications with DEA to discuss the outcome of the Scoping process.
During preparation of draft EIA Report and Draft EMP	Ad hoc communications with DEA to discuss the outcome of the Scoping process, preparation of the draft EIA and draft EMP and other legislative issues that may arise.
Public Review of draft EIA report and draft EMP; and attend public meeting	Review of draft reports: Authorities, together with other stakeholders, will have the opportunity to review the Draft EIA and EMP reports during the 40- day review period; and to attend the public meeting. If requested, CSIR can present the Draft EIA and EMP reports to the authorities at a dedicated authority meeting during this review period.
During the EIA process	Site visit: We propose to invite the authorities for a site visit to take place preferably at the same time of the public meeting for the Draft EIA and EMP reports. The public meeting is planned for 8 May 2012.
During Final EIA report phase	Decision on final reports: Meetings with dedicated departments, if requested by DEA, with jurisdiction over particular aspects of the project (e.g. Local Authority) and potentially including relevant specialists.

4.5 APPROACH TO SPECIALIST STUDIES AND IMPACT ASSESSMENT

This section outlines the assessment methodology and legal context for specialist studies, in accordance with *Section 3: Assessment of Impacts*, in DEA Guideline 5, June 2006.

4.5.1 Generic Terms of Reference for the assessment of impacts

The identification of potential impacts should include impacts that may occur during the construction and operational phases of the activity. The assessment of impacts is to include direct, indirect as well as cumulative impacts.

In order to identify potential impacts (both positive and negative) it is important that the nature of the proposed activity is well understood so that the impacts associated with the activity can be understood. The process of identification and assessment of impacts will include:

- Determine the current environmental conditions in sufficient detail so that there is a baseline against which impacts can be identified and measured;
- Determine future changes to the environment that will occur if the activity does not proceed; and
- An understanding of the activity in sufficient detail to understand its consequences; and
- The identification of significant impacts which are likely to occur if the activity is undertaken.

As per *DEA Guideline 5: Assessment of Alternatives and Impacts* the following methodology is to be applied to the predication and assessment of impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:

- **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity. These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable.
- **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity. These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.
- **Cumulative impacts** are impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities. Cumulative impacts can occur from the collective impacts of individual minor actions over a period of time and can include both direct and indirect impacts.
- **Spatial extent** – The size of the area that will be affected by the impact:
 - Site specific
 - Local (<2 km from site)

- Regional (within 30 km of site)
- National.

- **Intensity** –The anticipated severity of the impact:
 - High (severe alteration of natural systems, patterns or processes)
 - Medium (notable alteration of natural systems, patterns or processes)
 - Low (negligible alteration of natural systems, patterns or processes).

- **Duration** –The timeframe during which the impact will be experienced:
 - Temporary (less than 1 year)
 - Short term (1 to 6 years)
 - Medium term (6 to 15 years)
 - Long term (the impact will cease after the operational life of the activity)
 - Permanent (mitigation will not occur in such a way or in such a time span that the impact can be considered transient).

Using the criteria above, the impacts will further be assessed in terms of the following:

- **Probability** –The probability of the impact occurring:
 - Improbable (little or no chance of occurring)
 - Probable (<50% chance of occurring)
 - Highly probable (50 – 90% chance of occurring)
 - Definite (>90% chance of occurring).

- **Significance** – Will the impact cause a notable alteration of the environment?
 - Low to very low (the impact may result in minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making)
 - Medium (the impact will result in moderate alteration of the environment and can be reduced or avoided by implementing the appropriate mitigation measures, and will only have an influence on the decision-making if not mitigated)
 - High (the impacts will result in major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making).

- **Status** - Whether the impact on the overall environment will be:
 - positive - environment overall will benefit from the impact
 - negative - environment overall will be adversely affected by the impact
 - neutral - environment overall not be affected.

- **Confidence** – The degree of confidence in predictions based on available information and specialist knowledge:
 - Low
 - Medium
 - High.

- Management Actions and Monitoring of the Impacts (EMP)

Chapter 4, Approach to the EIA

- Where negative impacts are identified, mitigatory measures will be identified to avoid or reduce negative impacts. Where no mitigatory measures are possible this will be stated
- Where positive impacts are identified, augmentation measures will be identified to potentially enhance positive impacts
- Quantifiable standards for measuring and monitoring mitigatory measures and enhancements will be set. This will include a programme for monitoring and reviewing the recommendations to ensure their ongoing effectiveness.

The impacts will be further assessed in terms of the following:

The impacts will be further assessed in terms of the **reversibility of impacts** and the degree to which the impact can cause **irreplaceable loss of resources** as indicated below:

ASSESSMENT OF THE REVERSIBILITY OF IMPACT

Assessment term	Explanation of how to use this term
High reversibility of impacts	This is the <u>most</u> favourable assessment for the environment. For example, the nuisance factor caused by noise impacts from wind turbines can be considered to be highly reversible at the end of the project life, when
Moderate reversibility of impacts	
Low reversibility of impacts	
Impacts are non- reversible	This is the least favourable assessment for the environment. The impact is permanent. For example, the loss of a paleontological resource on the site caused by turbine foundations could be non-reversible.

ASSESSMENT OF THE DEGREE TO WHICH THE IMPACT CAUSES IRREPLACEABLE LOSS OF RESOURCES

Assessment term	Explanation of how to use this term
High irreplaceability of resources	This is the <u>least</u> favourable assessment for the environment. For example, if the project will destroy unique wetland systems, these may be irreplaceable.
Moderate irreplaceability of resources	
Low irreplaceability of resources	
Resources are replaceable	This is the most favourable assessment for the environment.

The Table below is to be used by specialists for the rating of impacts.

Table 4.2: Table for rating of impacts

Direct Impacts							
Mitigation	Spatial Extent	Intensity	Duration	Probability	Significance & Status		Confidence
					Without Mitigation	With Mitigation	
Impact on Flora from increased risk of alien invasion in disturbed areas							
Alien invasive monitoring to be implemented as per EMP	Site	Medium	Long term	High	Medium	Low	Medium

Other aspects to be taken into consideration in the assessment of impact significance are:

- Impacts will be evaluated for the construction and operation phases of the development. The assessment of impacts for the decommissioning phase will be brief, as there is limited understanding at this stage of what this might entail. The relevant rehabilitation guidelines and legal requirements applicable at the time will need to be applied;
- The impact evaluation will, where possible, take into consideration the cumulative effects associated with this and other facilities/projects which are either developed or in the process of being developed in the local area; and
- The impact assessment will attempt to quantify the magnitude of potential impacts (direct and cumulative effects) and outline the rationale used. Where appropriate, national standards are to be used as a measure of the level of impact.

4.6 SPECIFIC ISSUES TO BE ADDRESSED IN SPECIALIST STUDIES

Based on an evaluation of issues to date, the following Specialist Studies are proposed as part of the EIA phase:

Table 4.3: Specialist studies

Specialist Studies		
Jamie Pote	Private Consultant	Ecology (Flora and Fauna)
Chris van Rooyen	Chris van Rooyen Consultants	Birds
Stephanie Dippenaar	Private Consultant	Bats
Henry Holland	Mapthis	Visual impacts
Brett Williams	SafeTech	Noise
Dr Hugo van Zyl	Independent Economic Researchers	Economics
Dr Johan Binneman	Albany Museum	Archaeology
Dr John Almond	Natura Viva	Palaeontology
Dr Brian Colloty	Scherman Colloty & Associates	Aquatic (Wetland) specialist
Johann Lanz	Private Consultant	Soil and Agricultural potential
Public Participation Process		
Sandy Wren	Public Process Consultants	Public Participation Process

The Terms of Reference (ToR) for the specialist studies essentially consisted of the generic assessment requirements and the specific issues identified for each study. These issues have been identified through the baseline studies, I&AP and authority consultation during the scoping phase, as well as input from the proposed specialists based on their experience. As part of the review of the Draft Scoping Report, specialists were requested to propose any additional issues for inclusion in the specialist studies. Additional issues, identified through public and authority consultation during Scoping, as well as specialist inputs, were included in the final Terms of Reference for specialists.

4.6.1 Fauna and Flora

The ecological specialist study included the following:

- Describe the vegetation in the study area.
- Determine species composition of each vegetation type, and the presence of potential protected species.
- Describe the current state of the vegetation on site.
- Describe the conservation status and value of the vegetation.
- Describe transformations and invasive alien plant species.
- Provide a vegetation sensitivity map of the sites.
- Include Faunal Assessment (Mammal; amphibian and reptile).

- Identify and assess potential impacts on fauna and flora, outline mitigatory measures and outline additional management guidelines.
- Assess the significance of the impacts.
- Indicate potential no go areas; and
- Identify management actions to avoid or reduce negative impacts on fauna and flora for inclusion in the EMP.

4.6.2 Birds

The bird specialist study included the following:

- A desktop review of available information that can support and inform the specialist study i.e. potential impacts on birds.
- Establish which species may occur in the area, their relevant conservation status and which ones would be potentially most at risk.
- Identification of issues and potential impacts related to birds, which are to be considered in combination with any additional relevant issues that may be raised through the public consultation process.
- Assessment of the potential, as well as potential cumulative, impacts on birds, both positive and negative, associated with the proposed project for the construction, operation and decommissioning phases.
- Compilation of a bird sensitivity map or identification of buffer zones and no-go areas to inform the turbine layout.
- Identification of management actions to avoid or reduce negative impacts; and to enhance positive benefits of the project on avifauna; and
- In addition to the specialist study, a pre-construction bird monitoring programme is being undertaken. The results and recommendations of this monitoring programme should be included in the specialist bird reports and the EMP.

4.6.3 Bats

The bat specialist study included the following:

- Identify and assess the potential impacts of the wind project on bats and bat mortality.
- Establish which species may occur in the area and their relevant conservation status.
- Conduct field work to assess bat species presence at the proposed site, the presence of any large bat roosts or maternity colonies, and areas of foraging activity.
- Identify potential management plans to reduce the impact of the wind farm on the local bat community.
- Compilation of a bat sensitivity map or identification of buffer zones and no-go areas to inform the turbine layout; and
- In addition to the specialist study, a pre-construction bat monitoring programme is being undertaken. The results and recommendations of this monitoring programme should be included in the specialist bat reports and the EMP. It should be noted that the bat monitoring programme is not being undertaken by the bat specialist for this study, Ms Dippenaar.

4.6.4 Visual

The visual specialist study included the following:

- Conduct a site visit to identify potential visual sensitive receptors.
- Identify and assess the potential visual impacts of the wind project on landscape character and sense of place, including a viewshed analysis and taking into consideration factors such as visual sensitivity and visual absorption capacity. This should be done in combination with any additional relevant issues that may be raised through the public consultation process.
- Identify possible cumulative impacts related to the visual aspects for the proposed project.
- Assess the potential impact/impacts, both positive and negative, associated with the proposed project for the construction, operation and decommissioning phases; and
- Identify management actions to avoid or reduce negative visual impacts for inclusion in the EMP.

4.6.5 Noise

The noise specialist study included the following:

- Conduct a site visit to identify potential noise sensitive receptors.
- Identify issues and potential impacts, as well as possible cumulative impacts, related to the noise aspects for the proposed project.
- The measurement of the existing ambient noise (day and night time).
- A noise study/modelling of the future potential impact/s during construction and operation of the proposed project, taking into consideration sensitive receptors.
- Identify and assess the potential impacts associated with the proposed project for the construction, operation and decommissioning phases; and
- Identify management actions to avoid or reduce negative noise impacts for inclusion in the EMP.

4.6.6 Economic

The Economic specialist study included the following:

- Describe the existing socio-economic characteristics/context of the local area and broader region.
- Identify and assess potential socio-economic impacts (e.g. job creation, skills development and training, community investment programmes, promotion of secondary industries etc) at local as well as wider scales as relevant. These are expected to include the following:
 - Broad level review of the need and financial viability/risks associated with the project.
 - Degree of fit with local, regional and national economic development visions and plans including renewable energy planning.

- Impacts on overall economic development potential in the area including impacts on commercial enterprises nearby the site (incl. agriculture, small businesses, tourism establishments and others).
- Impacts associated with project expenditure on direct and indirect employment and household incomes. These impacts should be investigated through an examination of how the project and the spending injection associated with it may impact on the local, regional and national economy.
- Impacts associated with environmental impacts that have economic implications. This should focus on positive impacts associated with renewable energy use as well as potential negative impacts on neighbouring land owners should they be relevant.
- Recommend mitigation measures to both minimise the negative socio-economic effects, and to maximise the positive socio-economic effects of the proposed development, both during construction and operations.
- Address any additional issues raised through the public participation process, and
- Propose and implement additional ToR, if required, based on professional expertise, experience and compliance with the relevant specialist study guidelines and best practice.

4.6.7 Heritage (Archaeology, Palaeontology, historical and cultural aspects)

- Identify and assess potential impact on archaeology (e.g. stone age artefacts)
- Identify and assess potential impact of excavations on palaeontology (e.g. fossils).
- Identify and assess potential impacts on the built environment or places of historical and cultural significance (e.g. national monuments and grave sites).
- Identify management actions to avoid or reduce negative impacts on heritage for inclusion in the EMP.

4.6.8 Wetland and Aquatic Impact Assessment

- A desktop biodiversity assessment of the study area. This would cover the development footprint in relation to available ecological information related to wetland and riverine ecosystems functioning within the region.
- A map demarcating the relevant local drainage area of the respective wetland/s, i.e. the wetland, its respective catchment and other wetland areas within a 500m radius of the study area. This will demonstrate, from a holistic point of view the connectivity between the site and the surrounding regions, i.e. the zone of influence.
- Maps depicting demarcated wetland areas delineated to a scale of 1:10 000, following the methodology described by the Department of Water Affairs, together with a classification of delineated wetland areas. A detailed methodology is supplied in the Annexure.
- The determination of the ecological state of any wetland and riparian area, estimating their biodiversity, conservation and ecosystem importance. This will be based on the latest Present Ecological State / Ecological Importance & Sensitivity (PES/EIS) methodology being developed by DWA and SC&A for the Eastern Cape Province. Note that this determination will not include avifaunal, herpetological or invertebrate studies; however possible habitat for species of special concern would be commented on.

- Recommend buffer zones and No-go areas around any delineated wetland areas based on the relevant legislation (e.g. Eastern Cape Biodiversity Conservation Plan guidelines) or best practice judgement for those systems that are found to have ecological value, and should be retained.
- Assess the potential impacts, based on a supplied methodology.
- Provide mitigations regarding project related impacts, including engineering services that could negatively affect demarcated wetland areas.
- Supply the client with geo-referenced GIS shape files of the wetland / riverine areas.

4.6.9 Soil and Agricultural potential

- Provision of a site plan
- Mapping of soil forms and identification of the following soil characteristics
 - soil depth
 - soil colour
 - clay content
 - limiting factors
- Indication of the slope of the site.
- Identification of land use, developments and access routes on and surrounding the site.
- Assessment of the status of the land including erosion, vegetation and degradation.
- Identification of possible land use options for the site.
- An assessment of the potential impact of the development on agriculture and identification of possible mitigation measures to reduce potential impacts.
- Rehabilitation plan to rehabilitate the roads after construction.

4.7 SUPPORTING TECHNICAL STUDIES

Aviation

WKN Windcurrent obtained approval from the South African Civil Aviation Authority for the proposed Banna Ba Pifhu project (see letter in Appendix G).

4.8 APPROACH TO THE ASSESSMENT OF ALTERNATIVES

As per *Guideline 5: Assessment of Alternatives and Impacts* (DEA, June 2006), the EIA Regulations require that alternatives to a proposed activity be considered. Alternatives are different means of meeting the general purpose and need of a proposed activity. This may include the assessment of site alternatives, activity alternatives, process or technology alternatives, temporal alternatives and/or the no-go alternative.

The EIA Regulations indicate that alternatives that are considered in an assessment process be reasonable and feasible. I&APs must also be provided with an opportunity of providing inputs into the process of formulating alternatives. The assessment of alternatives should, as a minimum, include the following:

- The consideration of the no-go alternative as a baseline scenario;
- A comparison of the selected alternatives; and

- Providing reasons for the elimination of an alternative.

The approach to investigating alternatives was presented in the Scoping Report (refer to Final Scoping Report, CSIR, 2011). An overview of these alternatives is provided below, together with updated information that incorporates the revised layout alternatives and findings from the specialist studies.

4.8.1 Location Alternatives

During the pre-feasibility for the project, WKN Windcurrent reviewed a range of potential sites in the Kouga Region. These sites were evaluated based on a range of criteria such as:

- Local wind climate, using data from local weather stations in the area;
- Local power line network, including existing grid availability, stability and capacity, local power utilisation, future developments and planned power line upgrades;
- Road access for construction and operational maintenance and the topography of the site;
- Existing wind farm development proposals;
- Engagement with landowners; and
- The visibility of the project with regard to local habitation and tourism.

Based on the above review, WKN Windcurrent selected the Banna Ba Pifhu site located near Humansdorp (subject of this EIA) as its preferred option. Following site selection WKN Windcurrent moved forward towards a feasibility study. An environmental screening study for the Banna Ba Pifhu site was undertaken by the CSIR in November 2009. Based on this preliminary screening, it was concluded that there were no fatal flaws identified from an environmental perspective that would necessitate termination of the project at this stage, provided that the exclusion criteria are reviewed in more detail as part of the forthcoming planning in the EIA phase.

4.8.2 No-go alternative

This alternative will be included in the EIA as a benchmark against which to assess the impacts (positive and negative) of the proposed Banna Ba Pifhu Wind Energy Project. The main negative implication of the no-go option is a lack of power supply through the wind farm.

Selecting the no-go alternative will reduce the risk of bird and bat mortalities as no turbines would be erected. Furthermore, potential negative impacts on vegetation, fauna and the visual character of the area would also be avoided by the no-go alternative.

4.8.3 Land use alternative

At present the proposed site is zoned for Agriculture, and is mainly used for extensive cattle grazing. WKN Windcurrent wishes to diversify the use of renewable energy resources by erecting a solar and a wind energy facility on the same farm. In addition to the application for a proposed wind farm, WKN Windcurrent also submitted an application to DEA for the erection of a 4.5 MW photovoltaic (PV) solar PV project on portion 15 of farm 689 and portion 1 of farm 868 (DEA

reference number: 12/12/20/2236). These properties are included in the study area for the proposed Banna Ba Pifhu wind farm. The closest turbine will be located 389 m from the PV facility (Figure 2.4 in Chapter 2). The PV project comprises a Basic Assessment. The Final Basic Assessment Report has been submitted to DEA for decision-making in December 2011 (CSIR Ref No: Stel General: 9291). A decision from DEA is currently pending.

4.8.4 Technology alternatives as part of the development

The only feasible technological alternative to the horizontal axis wind turbine (HAWT) is the vertical axis wind turbine (VAWT). With the VAWT system, the turbine rotor shaft is mounted vertically as opposed to the horizontal mount of the HAWT (Figure 4.2). Such a configuration affords the VAWT various advantages, most notably; easy access to the turbine gearbox and relative quiet operation. WKN Windcurrent, however, did not consider VAWT to be a reasonable alternative technology due to the unproven nature of these turbines at a commercial or Megawatt scale as well as its reduced efficiency (due to its relative low height and subsequent lower wind speeds at ground level) compared to that of HAWT (REFOCUS, 2003). Further the HAWT have proven worldwide that it has installed capacity of more than hundred GW.

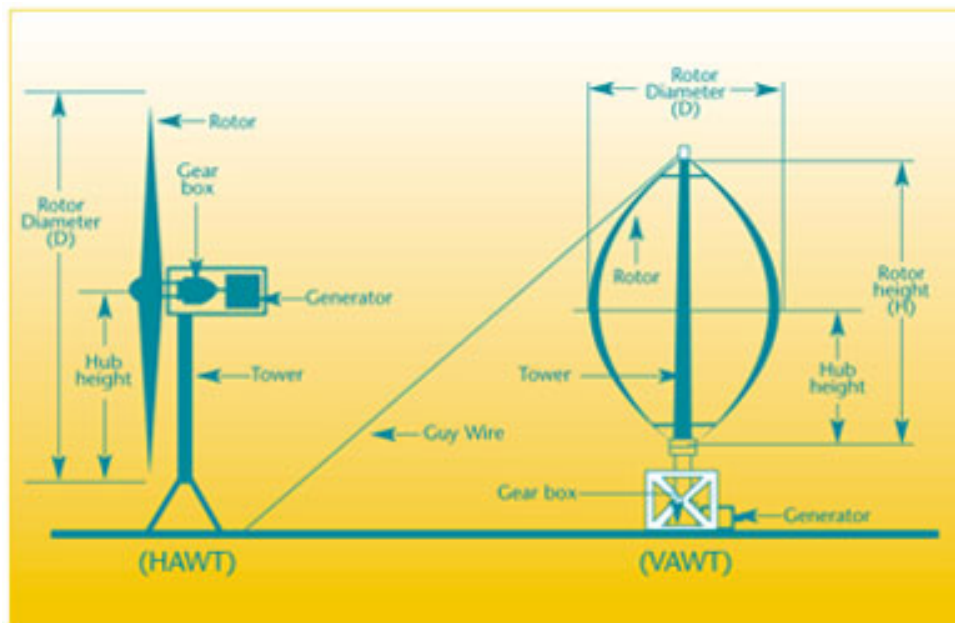


Figure 4.2: Comparison between HAWT and VAWT systems (not to scale)

4.8.5 Activity Alternatives as part of the development

The fundamental goal of the WKN Windcurrent project is the economically viable generation of renewable energy (RE) on a commercial scale. Theoretically, RE alternatives which could potentially achieve the same power generation targets include solar power generation (concentrated solar power and photovoltaic), hydro-electricity and biomass-based energy generation. Wind energy was selected as the energy source of choice due to the very favourable wind regime of the Kouga area, compared to the relatively poor solar, hydro and biomass resources in the study area (refer to Figures 4.3 to 4.6).

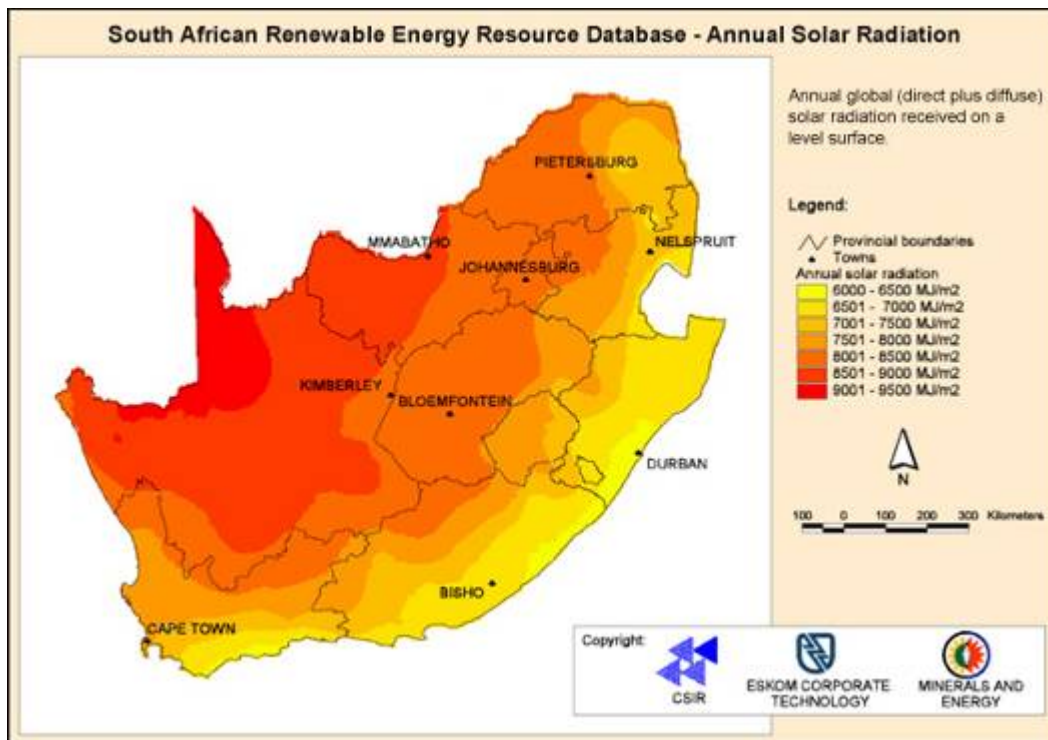


Figure 4.3: South African annual solar radiation in MJ/m⁴

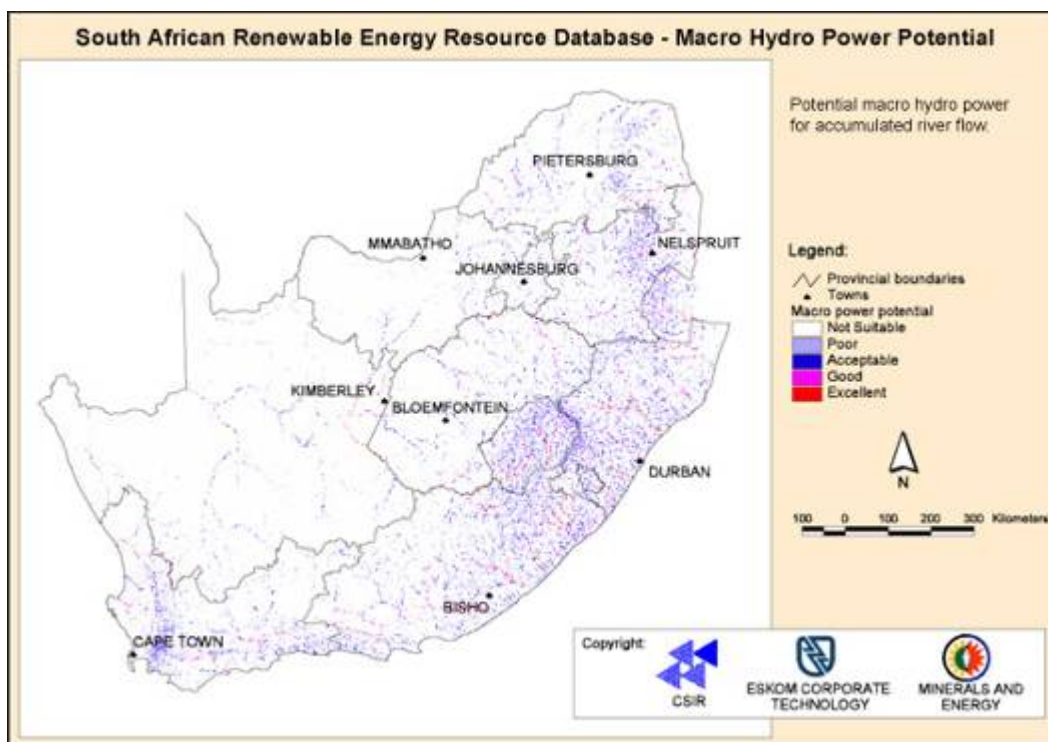


Figure 4.4: South African macro hydro power potential

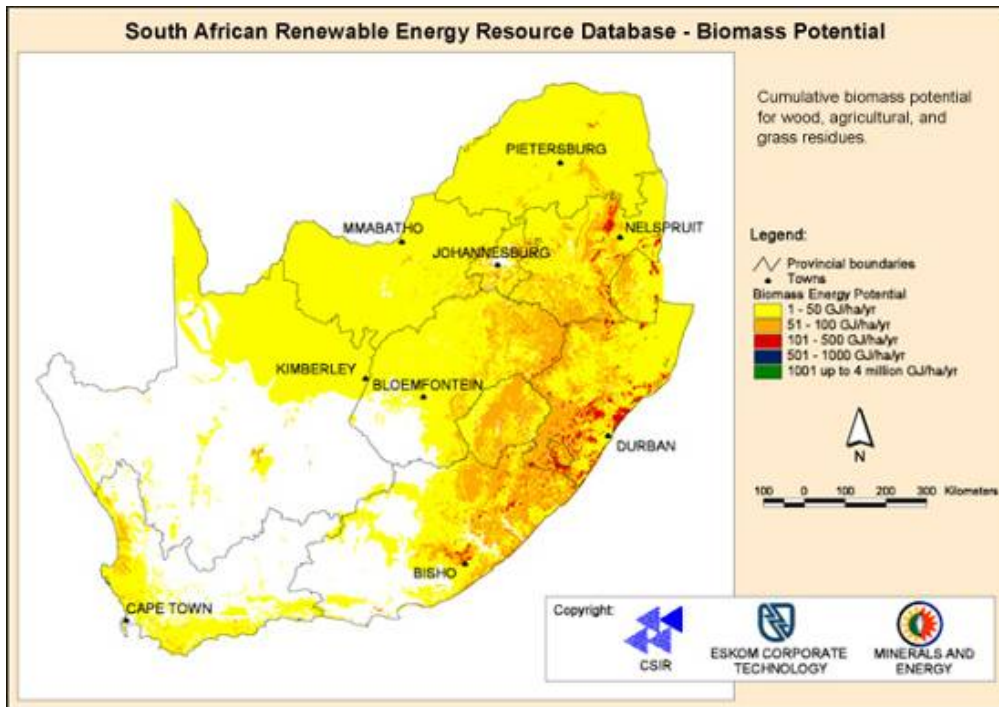


Figure 4.5: South African biomass potential

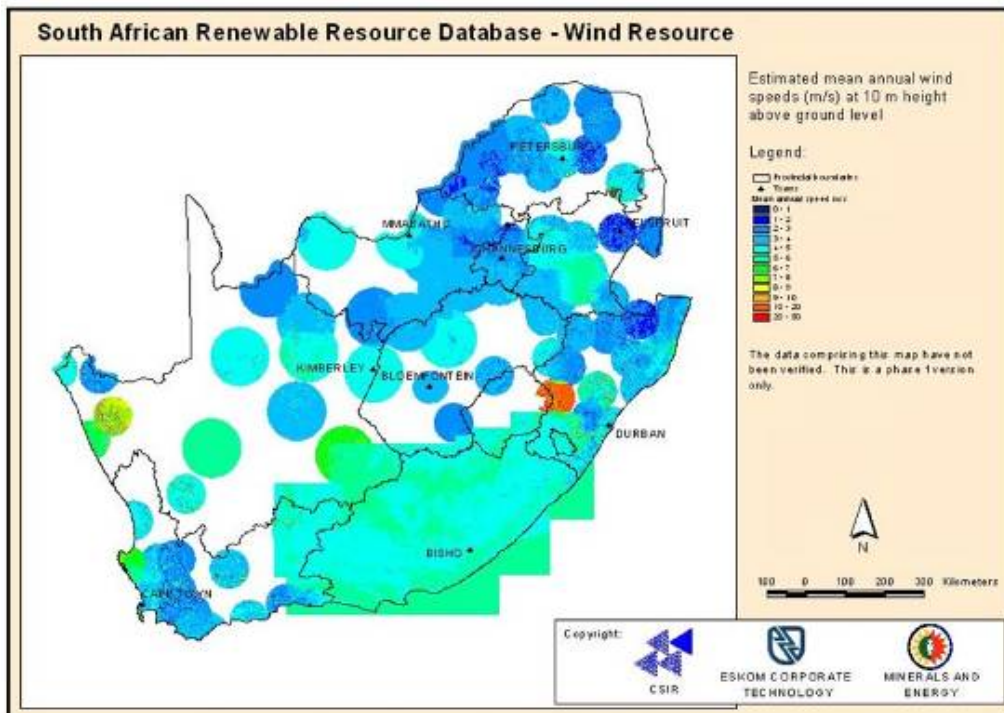


Figure 4.6: South African wind resource with the study area receiving between 4-5m & 5-6m/second mean annual wind speeds

4.8.6 Turbine size alternatives as part of the development

WKN Windcurrent proposes to establish approximately 15 to 27 wind turbines, depending on the capacity of the turbines to be used (i.e. 1.8 MW or 3.2 MW). The total installed capacity will be a maximum of 50 MW. The proponent is considering a multitude of turbine suppliers. The preferred supplier and turbine capacity will be chosen later in the EIA process.

4.8.7 Activity and layout alternatives as part of the development

Different scales of turbines and different turbine technology providers were considered by WKN Windcurrent. When considering alternative suppliers, key factors were availability of turbines on the international market, suitable to the South African wind climate, and service levels and experience in South Africa.

WKN Windcurrent has initially selected three alternative turbine suppliers and sizes for the proposed Banna Ba Pifhu wind energy project -these are listed below. WKN Windcurrent has prepared three alternative layouts based on these alternative suppliers and turbine sizes: In addition to the potential turbine numbers shown below, WKN Windcurrent is also proposing 3 additional turbine locations for the 2 MW and 2.5 MW layouts and 2 additional turbine locations for the 3 MW layout. These alternative turbine locations will be used should individual turbine locations of the current proposed locations not be favourable from an environmental perspective.

The three selected alternative turbine suppliers and sizes for the proposed Banna Ba Pifhu wind energy project are provided below:

- Vestas V90 (2 MW) –comprising 25 turbines (and 3 potential additional turbines) (see layout in Figure 4.7);
- Vestas V112 (3 MW) – comprising 17 turbines (and 2 potential additional turbines) (see layout in Figure 4.8); and
- Nordex N100 turbines (2.5 MW) comprising 20 turbines (and 3 potential additional turbines) (see layout in Figure 4.9).

The specialists have reviewed and assessed the three alternative layouts based on various factors such as the proximity to dwellings, proximity to roads, access to roads, proximity to undisturbed natural areas, wetlands or water courses, the botanical sensitivity of the proposed area as well as the sensitivity of the area from a birds, bats, noise, visual heritage, socio-economic and agricultural perspective. The turbine layout was also informed by the wind regime (climate).

The specialists made recommendations to the three alternative layouts to reduce environmental impacts. These recommendations include the relocation of some turbines to avoid irrigated land and the increase of buffer zones between some of the turbines and the wetland areas.

WKN Windcurrent applied these recommendations and subsequently prepared a **new updated preferred layout**. The three initial alternative layouts were condensed into one layout containing a maximum number of 27 turbines (see Figure 4.10). In addition to the 27 turbines, optional turbine positions were also identified that are to be used should the individual turbine locations

not be favourable from an environmental perspective. The current layout is applicable to the different proposed turbine types. The current preferred layout was reviewed by the specialists and they are satisfied that their requirements were met.

4.9 SCHEDULE FOR THE EIA

The proposed schedule for the EIA, based on the legislated EIA process, is presented in Table 4.3. It should be noted that this schedule might be revised during the EIA process, depending on factors such as the time required for decisions from authorities.

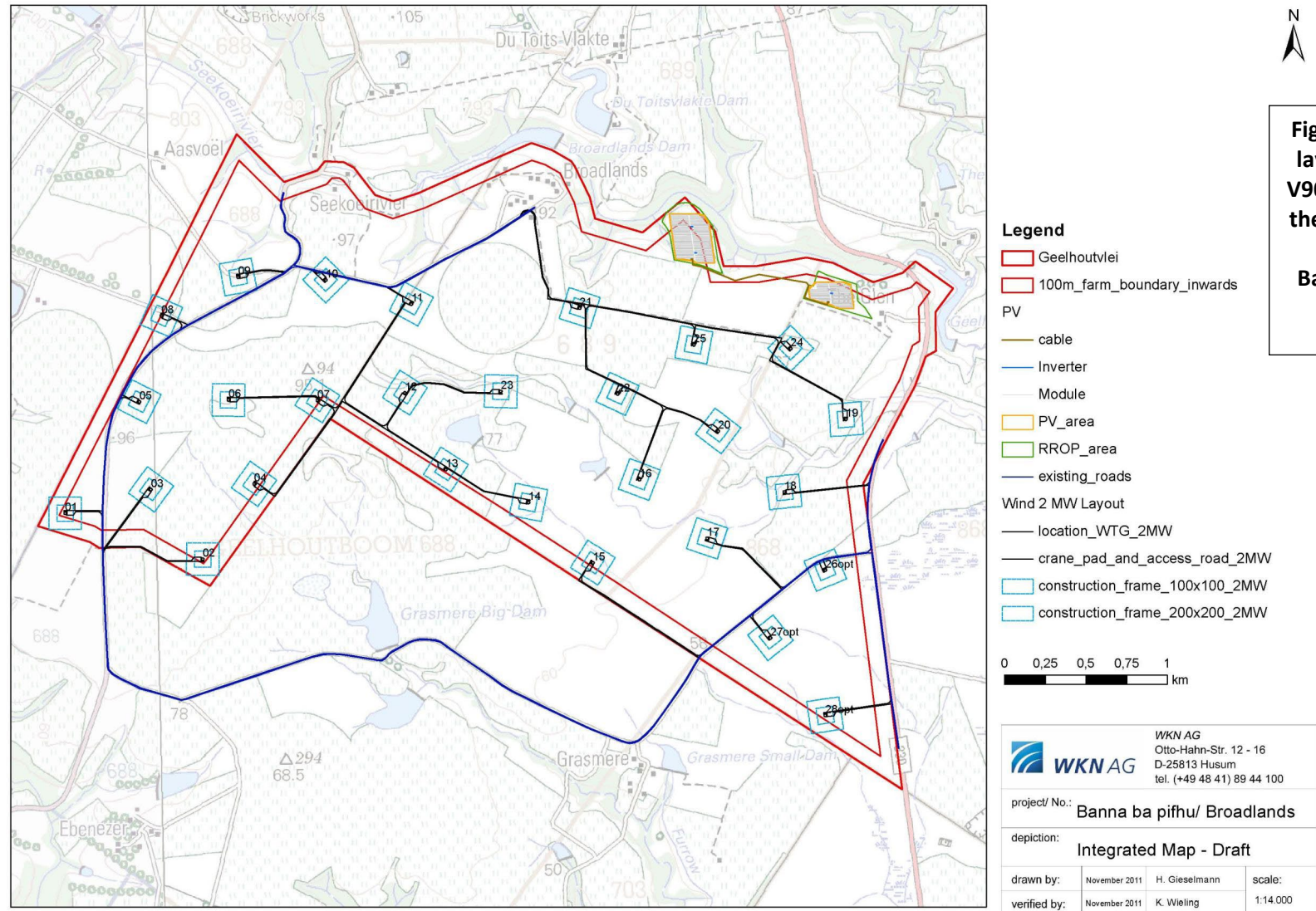
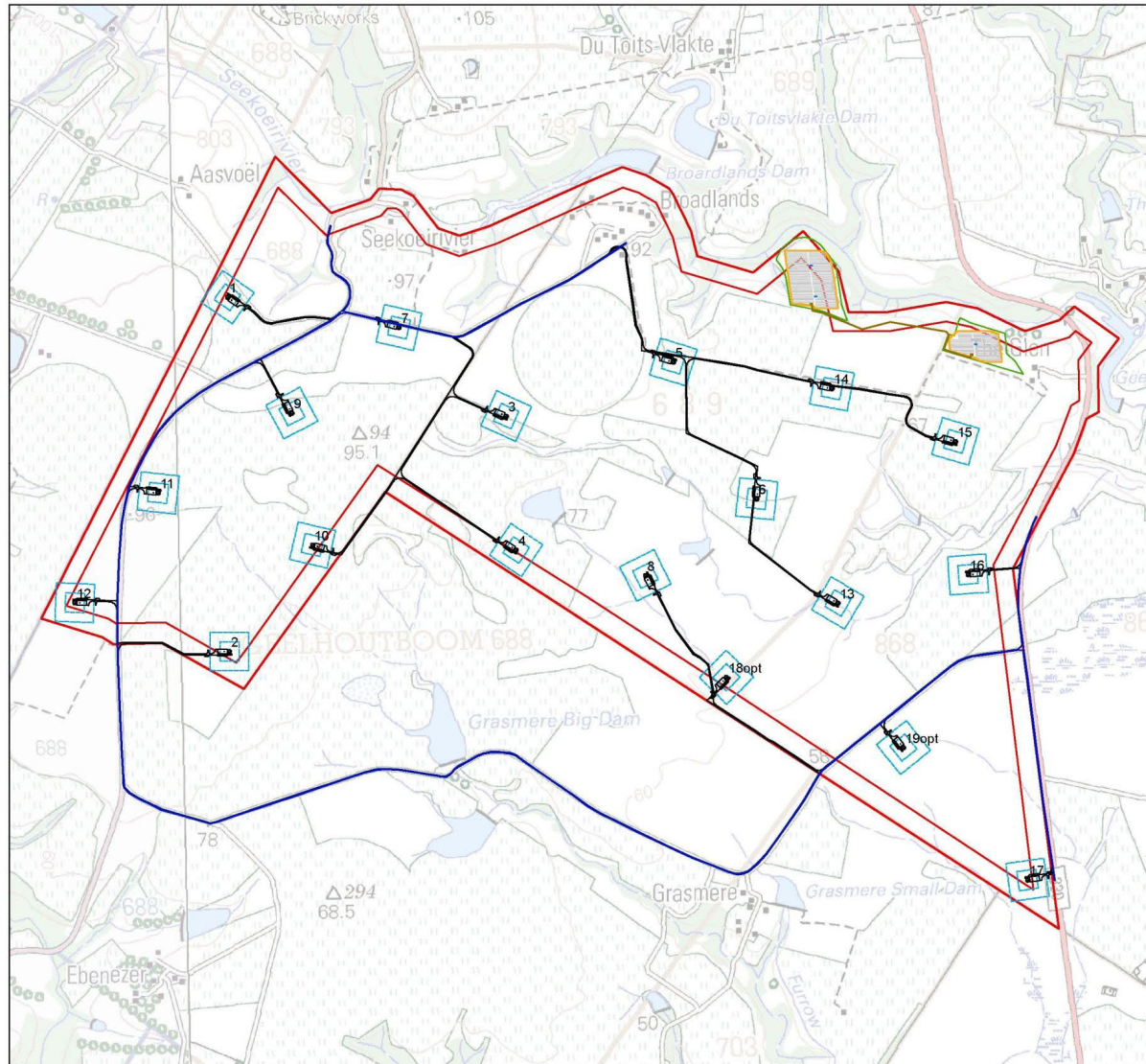


Figure 4.7: Proposed layout for the Vestas V90 (2MW) turbine for the WKN Windcurrent for the proposed Banna Ba Pifhu wind energy project



Legend

- Geelhoutvlei
- 100m_farm_boundary_inwards
- PV**
- cable
- Inverter
- Module
- PV_area
- RRDP_area
- existing_roads
- Wind 3 MW Layout**
- location_WTG_3MW
- crane_pad_and_access_road
- foundation_WTG_3MW
- construction_frame_100x100_3MW
- construction_frame_200x200_3MW

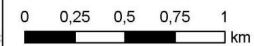


Figure 4.8: Proposed layout for the Vestas V112 (3MW) turbine for the WKN Windcurrent for the proposed Banna Ba Pifhu wind energy project

WKN AG		
WKN AG Otto-Hahn-Str. 12 - 16 D-25813 Husum tel. (+49 48 41) 89 44 100		
project/ No.: Banna ba pifhu/ Broadlands		
depiction: Integrated Map - Draft		
drawn by:	November 2011	H. Gieselmann
verified by:	November 2011	K. Wlieling
		scale: 1:14 000

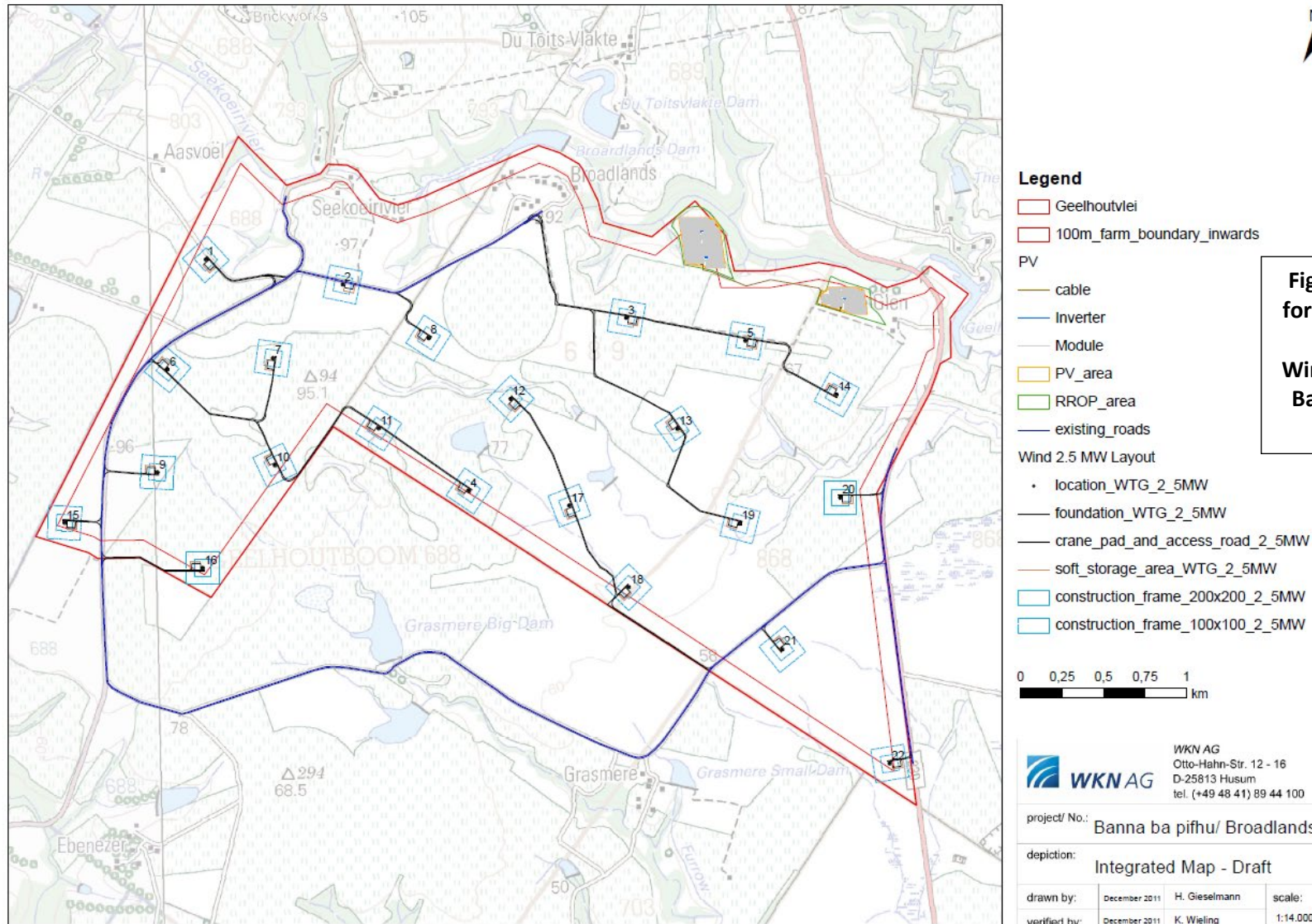


Figure 4.9: Proposed layout for the Nordex N100 (2.5MW) turbine for the WKN Windcurrent for the proposed Banna Ba Pifhu wind energy project

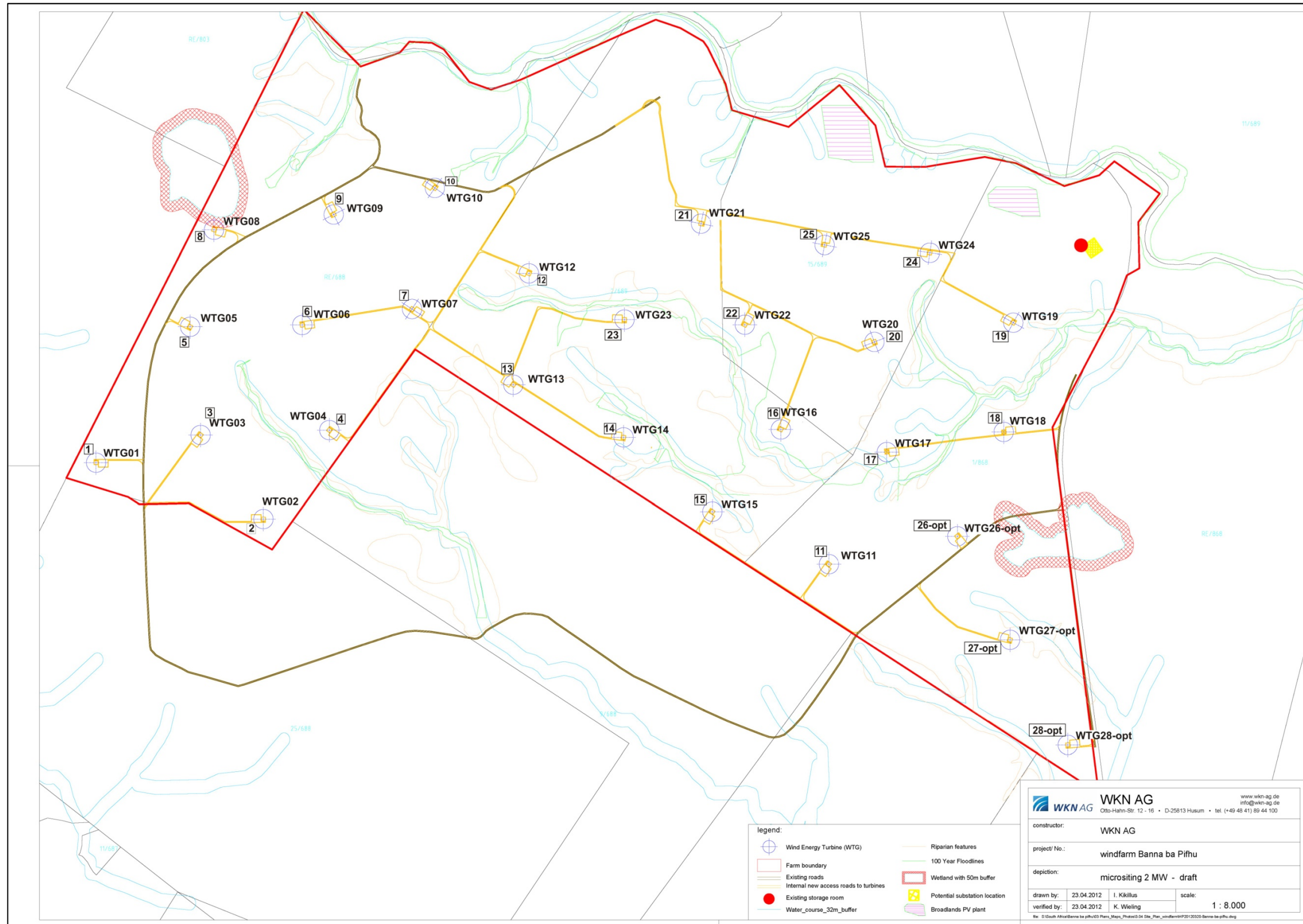


Figure 4.10: Preferred updated layout of the location of the turbines as well supporting infrastructure such as roads relative to features such as riparian areas and the 1:100 year floodline.

Table 4.4: EIA Schedule for the Banna Ba Pifhu Wind Energy Project

TASKS		EIA SCHEDULE (MONTHS)																			
		2011 May	Jun	July	Aug	Sept	Oct	Nov	Dec	2012 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	Establish I&AP database, prepare BID and announce EIA	█																			
2	I&AP registration & meetings with key stakeholders to source issues	█	█																		
3	Prepare Draft Scoping Report (DSR) and Plan of Study for EIA (PSEIA)		█	█																	
4	Public comments period (40 days) on DSR and stakeholder meetings			█	█																
5	Submit Final Scoping Report (FSR) and PSEIA to I&APs (21 days) and to authorities for decision (30 days)						█	█													
6	Communicate authority decision to I&APs and process for next phase						█	█													
7	Specialist studies (including fieldwork)						█	█	█	█	█	█	█	↓							
8	Prepare Draft EIA Report and EMP							█	█	█	█	█	█	↓	█						
9	Public review of Draft EIA Report and EMP (40 days)														█	█	█				
10	Submit Final EIA Report and Draft EMP to authorities															█					
11	Public review of Final EIA Report and EMP (21 days)																█				
12	Decision by authorities																█	█	█	█	█
13	Appeal process																				→

Key:

- BID: Background Information Document
- DEA: National Department of Environmental Affairs
- DEIA: Draft EIA report
- DSR: Draft Scoping Report
- FSR: Final Scoping Report
- PSEIA: Plan of Study for EIA
- EMP: Environmental Management Plan