



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DEA Reference: 14/12/16/3/3/1/2033

Enquiries: Herman Alberts

Telephone: (012) 399 9371 **E-mail:** HAlberts@henvironment.gov.za

Ms Karen Jodas
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2157

Telephone Number: (011) 656 3237
Email Address: karen@savannahsa.com

PER E-MAIL / MAIL

Dear Ms Jodas

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION OF ELECTRICAL GRID INFRASTRUCTURE TO SUPPORT THE ZONNEQUA WIND ENERGY FACILITY (WEF), NORTHERN CAPE PROVINCE

The Draft Basic Assessment Report (BAR) dated May 2019 and received by the Department on 29 May 2019, refer.

On 08 December 2014 the Minister of Water and Environmental Affairs promulgated regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), viz, the NEMA Environmental Impact Assessment (EIA) Regulations 2014 (GN R982, R983, R984 and R985 of 04 December 2014). The NEMA EIA Regulations, 2014 and listing notices, were subsequently amended on 07 April 2017 (refer to GN R324, R325, R326, R327 of 07 April 2017) and is being referred to as NEMA EIA Regulations, 2014, as amended. The same referencing would apply to the listing notices containing the listed activities that would require Environmental Authorisation.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Listed Activities

- i. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.
- ii. If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.

(b) Alternatives

- i. Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 1 (2) (e)

and 3 (1) (h) (i) of GN R.982 of 2014, as amended. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

(c) Project details

- i. The final BAR must provide the technical details for the proposed powerline in a table format as well as their description and/or dimensions, as per below.

Component	Description / dimensions
Length of powerline	
Area of servitude	
Clearance height of powerline	
Area occupied by inverter / transformer stations / substations	
Capacity of powerline	
Area occupied by both permanent and construction laydown areas	

- ii. The final BAR must provide the four corner coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.

(d) Specialist Declaration of Interest

- i. Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).

(e) Undertaking of an Oath

- i. The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR, but rather an appendix of the application form attached to the BAR. Please note that the final BAR must also have an undertaking under oath/ affirmation by the EAP.
- ii. Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
- "an undertaking under oath or affirmation by the EAP in relation to:*
- (i) the correctness of the information provided in the reports;*
 - (ii) the inclusion of comments and inputs from stakeholders and I&APs;*
 - (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and*
 - (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".*

(f) Details and Expertise of the EAP

- i. You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.

(g) Public Participation Process

- i. The following information must be submitted with the final BAR:
- A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
 - Copies of all comments received during the draft BAR comment period; and

- A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- ii. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.
- iii. Proof of correspondence with the various stakeholders must be included in the final BAR. 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 Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(h) Environmental Management Programme

- i. It is drawn to your attention that in terms of Government Gazette No. 435 of 22 March 2019, applications for environmental authorisation for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, contemplated in Regulations 19(4) and Appendix 4(2) of EIA Regulations 2014, as amended must be used. As such, the following generic EMPr as contemplated in Regulation 19(4) and appendix 4(2) must be submitted as part of the final report.
 - Generic EMPr for development and expansion for overhead electricity transmission and distribution infrastructure; and
 - Generic EMPr for development and expansion of substation infrastructure for transmission and distribution of electricity.
- ii. In addition to the above, if any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in section C of the generic EMPr.

General

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."*

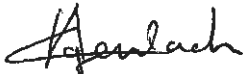
Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process"*

contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Environmental Affairs
Signed by: Mr Coenrad Agenbach
Designation: Deputy Director: Priority Infrastructure Projects
Date: 01-07-2019

cc:	Davin Chown	Genesis Zonnequa Wind (Pty) Ltd	Email: davin@genesis-eco.com
	Brian Fischer	NC Department of Environment and Nature Conservation	Email: BFisher@ncpg.gov.za
	Samantha Titus	Nama Khoi Local Municipality	Email: municipality.manager@namakhoi.gov.za



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Karen Jodas
Savannah Environmental (Pty) Ltd
P.O. Box 148
SUNNINGHILL
2157

Tel: 011 656 3237

Email: karen@savannahsa.com

PER EMAIL / MAIL

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FOR ENVIRONMENTAL AUTHORISATION (BASIC ASSESSMENT PROCESS) AND BASIC ASSESSMENT REPORT FOR THE PROPOSED GRID CONNECTION INFRASTRUCTURE FOR THE ZONNEQUA WIND FARM, NORTHERN CAPE PROVINCE

The Department confirms having received the Application for Environmental Authorisation and Draft Basic Assessment Report for the abovementioned project on 29 May 2019. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

Yours sincerely



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Environmental Affairs

Letter signed by: Ms Toinette van der Merwe

Designation: Control Environmental Officer: IEM Systems & Tools Coordination

Date: 4/06/2019

CC:	Davin Chown	Genesis Zonnequa Wind (Pty) Ltd	Email: davin@genesis-eco.com
	Brian Fisher	Northern Cape Department of Environment and Nature Conservation (DENC)	Email: BFisher@ncpg.gov.za
	Samantha Titus	Nama Khoi Local Municipality	Email: municipal.manager@namakhoi.gov.za

**ZONNEQUA WIND FARM AND ASSOCIATED INFRASTRUCTURE ON A SITE LOCATED NEAR
KLEINSEE IN REDZ 8, NORTHERN CAPE PROVINCE**

PRE-APPLICATION MEETING WITH DEA: NOTES FOR THE RECORD

Meeting Date: 14 May 2018

Time: 09:30

Venue: Department of Environmental Affairs, Pretoria

Attendees (DEA attendance register attached):

NAME	ORGANISATION
Coenrad Agenbach	Department of Environmental Affairs
Adika Rambally	Department of Environmental Affairs
Mahlatse Shubane	Department of Environmental Affairs
Herman Alberts	Department of Environmental Affairs
Karen Jodas	Savannah Environmental
Lisa Opperman	Savannah Environmental
Davin Chown	Genesis Eco-Energy Developments

Both the Developer and the EAP prepared presentations to cover the items as listed in the agenda. These points were presented and included:

1. Introduction to the applicant, the project development team and the appointed EAP
2. Background to the Zonnequa Wind Farm project
3. Basic Assessment process and associated timeline, including the consideration of the REDZ
4. Way forward

These are attached to the Notes for completeness.

Notes:

The purpose of the meeting was to provide the applicant with an opportunity to provide a synopsis of the background to the proposed Zonnequa Wind Farm project to the DEA, and enable all parties to fully understand the project as well as the geographical location of the project site within the Springbok Renewable Energy Development Zone (i.e. REDZ 8). It was noted that significant work has already been undertaken and completed by some specialists for the proposed site. This includes an ecological screening assessment, as well as the 12-month bird and bat monitoring. The undertaking of specialist input prior to the lodging of an Application for Environmental Authorisation places the Developer in a unique position which enables them to already design a facility which responds to the already identified environmental constraints. Savannah Environmental outlined the EIA process that will be undertaken for the project, which in this case will be in-line with the Basic Assessment procedure as per the EIA Regulations, 2014, due to the location of the project site within a REDZ. The DEA was requested to provide input on the process and raise any specific requirements and expectations regarding the application.

The following was stated and noted for the record:

- » The DEA stated for the attention of the EAP and the Developer that the proposed Kap Vley Wind Energy Facility, which is planned to the east of the Zonnequa project site, requires a major biodiversity offset based on ecological issues associated with the area where the facility is planned. It was noted that the Zonnequa project site is largely outside of the identified sensitive habitats, but the offset requirement for the Kap Vley project was acknowledged by the EAP and the Developer, and all parties agreed that should an offset be required for the Zonnequa Wind Farm that the process will be undertaken in accordance with the regulations and legislation relevant at that time. DEA advised that should a biodiversity offset be required, that a draft agreement would be required to be submitted with the final Basic Assessment report for DEA's consideration, and that this should be factored in when considering the regulated EIA timeframes.
- » The Developer stated that a "funnel-down" approach was undertaken for the selection of the project site, which included the consideration of a larger area of 25 000ha for the development and the exclusion of certain areas due to technical and environmental constraints. Environmental constraints have been identified through the 12-month bird and bat monitoring campaigns as well as an ecological survey. The developer aims to avoid environmental sensitivities (as a primary mitigation strategy) to avoid the need for other mitigation strategies, such as biodiversity offsets.
- » The DEA confirmed that this is a preferred approach, and advised that the reporting must indicate that the mitigation hierarchy has been considered in determining the facility layout.
- » The DEA enquired if, due to the drought conditions, the bird, bat and/or ecology specialists would need to consider the impact of the facility within wetter conditions and may need to go back for follow up field work should the area receive rainfall. The EAP explained that the appointed specialists had been specifically considered to work on the project as they are familiar with the area, and have previously undertaken field work in this same area for other projects (such as the

Eskom site, and Project Blue). They therefore have completed surveys in the past in wetter conditions, and would be able to correlate their current findings accordingly. The EAP explained that this approach provides a high level of confidence in the findings of the specialist assessments. The DEA was in agreement with this approach and requested that a statement be included in the specialist reports which clarifies this.

- » The DEA requested that the authority site visit be undertaken once the Basic Assessment report has been made available and submitted to DEA for review.
- » Savannah Environmental stated that the Application for Environmental Authorisation is planned to be lodged at the end of June 2018.
- » Savannah Environmental stated that the Basic Assessment and public participation process for the Zonnequa Wind Farm will run concurrently with the proposed Namas Wind Farm located directly adjacent to the south of the project site.
- » Savannah Environmental explained that the listed activities included in the pre-application meeting request have not been confirmed due to the fact that all specialist reports have not been concluded. Savannah Environmental confirmed that the Application for Environmental Authorisation will consider and include all the relevant listed activities as per the EIA Regulations, 2014, required for the Zonnequa Wind Farm.
- » The DEA recommended that when the Application for Authorisation is submitted to the Admin Department, that it is made clear in the cover letter for each project that the project is located within a REDZ, and that the REDZ process applies. In addition, DEA also stated that the cover letter should make reference to the pre-application meeting held, and state the attendees of pre-application meeting so that the case officers for the project can be appropriately assigned by the Admin Department. Therefore, either Adika Rambally and/or Herman Alberts would be allocated as the case officers.
- » The DEA stated that the Basic Assessment report must be submitted directly to the DEA: Biodiversity Directorate for comments.
- » The DEA recommended that the World Wildlife Fund (WWF) be consulted with as part of the Basic Assessment and public participation process as they have been working with SANPARKS for the negotiation of the Kap Vley project biodiversity offsets.
- » The DEA also recommended that the Northern Cape Department of Environment and Nature Conservation (DENC) and the Square Kilometre Array (SKA) be consulted as part of the Zonnequa Wind Farm public participation process.
- » DEA indicated that Callie Nude or Deon Marais at DEA can be contacted to obtain the latest NPAES data.

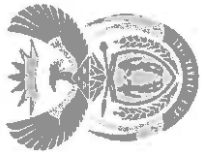
It was agreed that the notes from the meeting would be available to all parties, and include the presentations which had been prepared and presented at the meeting. The way forward is for the

Savannah Environmental to engage with Interested and Affected Parties (I&AP) and prepare the relevant reporting before submitting an Application for Environmental Authorisation to DEA.

Prepared by:

Lisa Opperman

lisa.o@savannahsa.com



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

VENUE: DEA, PRETORIA
DATE: 14 MAY 2018
TIME: 09:30

RE: NAMAS P ZONNEQUA WIND FARM
PRE-APPLIC MTG'S

ATTENDANCE REGISTER

NAME	ORGANISATION	TELEPHONE	E-MAIL ADDRESS	SIGNATURE
1. ADIKA RAMBALLY	DEA	012 399 9386	ARambally@environment.gov.za	<i>A Rambally</i>
2. Karen Jodas	Savannah Env.	011 656 3237	karen@savannahsa.com	<i>[Signature]</i>
3. DAVIN CHOUN	GENESIS EcoEnergy	085 400 3898	javine@genesis-eco.com	<i>[Signature]</i>
4. Lisa Opperman	Savannah Environ	084 920 3111	lisa.o@savannahsa.com	<i>[Signature]</i>
5. Mphahlele Shubane	DEA	012 399 9417	mshubane@environment.gov.za	<i>[Signature]</i>
6. Conrad Agambodh	PIZA	012 399 9403	capentach@ " "	<i>[Signature]</i>
7. HERMAN ALBERTS	DEA	012 399 9371	HALBERTS@environment.gov.za	<i>[Signature]</i>
8.				
9.				
10.				
11.				
12.				

NAMAS WIND FARM AND ZONNEQUA WIND FARM NEAR KLEINSEE, NORTHERN CAPE PROVINCE

Pre-Application Meeting

14 May 2018

MEETING AGENDA

1. Introduction to the applicant, the project development team and appointed EAP
2. Background to the Namas Wind Farm and Zonnequa Wind Farm projects
 - 2.1 *Nature and extent of the proposed projects*
 - 2.2 *Rationale for the proposed projects on the site*
 - 2.3 *Consideration of findings from specialist studies already undertaken for this area – bird and bat monitoring and ecology*
3. Basic Assessment process and associated timeline, including consideration of the REDZ
4. DEA comments
 - 4.1 *DEA comments regarding the planned BA process*
 - 4.2 *Defining DEA requirements for the BA process in a REDZ for a wind farm application*
 - 4.3 *Need for a DEA site inspection and timing of this site visit*
5. Way forward and closure ○

INTRODUCTION

» Applicant:

- * Genesis Namas Wind (Pty) Ltd
- * Genesis Zonnequa Wind (Pty) Ltd
- * These companies have been established as special purpose vehicles

» Project Development Team:

- * Genesis Eco-Energy (Pty) Ltd
- * Atlantic Energy Partners (Pty) Ltd

Namas Wind Farm and Zonnequa Wind Farm, Northern Cape

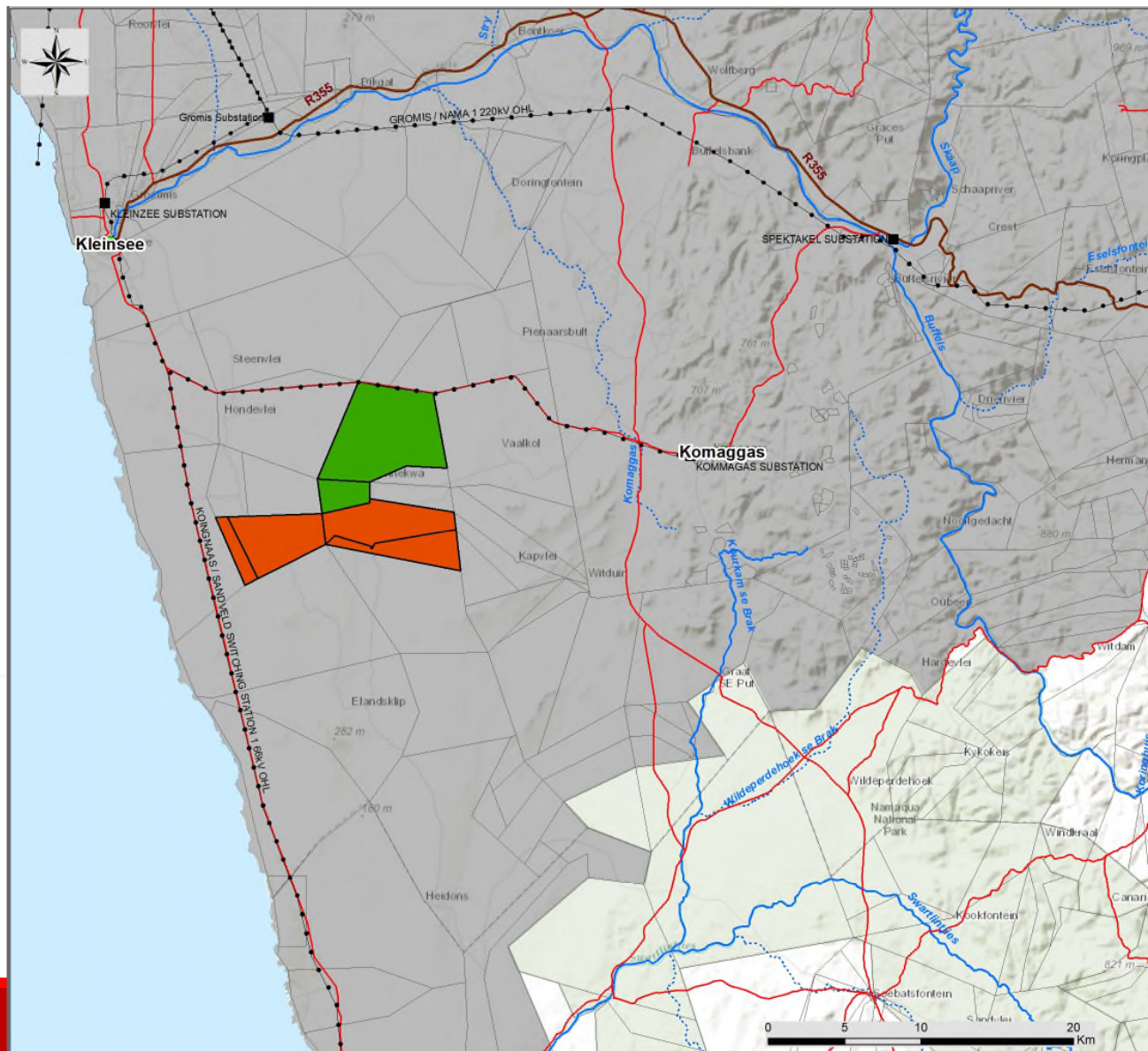
Locality Map considering the Focus Area 8 of the Renewable Energy Development Zones (REDZ)

Legend

- Town
- Eskom substation
- Eskom power line
- Regional road
- Main road
- Perennial river
- - - Non-perennial river
- Farm Portions
- Zonnequa Wind Farm Project Site
- Namas Wind Farm Project Site
- REDZ 8 - Springbok

savannah
environmental

Scale: 1:240 226
Projection: LO 17
Map Ref: Namas & Zonnequa - REDZ & Locality - 19 04 18



BACKGROUND

- » Nature and extent of the proposed project
- » Rationale for the proposed projects on this site
- » Consideration of findings from specialist studies already undertaken for this area
 - * Bird and Bat Monitoring
 - * Ecology

IMPACT ASSESSMENT PROCESS

- » GN113 and GN114 Gazetted on 18 February 2018
 - * “follow basic assessment procedure contemplated in Regulation 19 and 20 of the EIA Regulations, 2014, in order to obtain environmental authorisation”
- » Basic Assessment process will be undertaken:
 - * Independent specialist reports in line with Appendix 6 of the EIA Regulations – ecology, birds, bats, soils and agricultural potential, heritage, visual, noise and socio-economic
 - * Submission of one impact assessment report for review by I&APs and authorities
 - * One round of public participation

IMPACT ASSESSMENT PROCESS

» Timeframes:

- * Process will run for 147 day in total – 90 days for the BA and 57 days for decision on the Application by DEA
- * 90 days include –
 - submission of an Application for Environmental Authorisation and an Impact Assessment report for 30-day review period – commencement of timeframe
 - Undertaking of public participation process including consultation with authorities, key stakeholders and I&APs
 - Submission of final Impact Assessment report for decision-making by DEA
- * 57 days include -
 - DEA decision on granting of Environmental Authorisation

Namas and Zonnequa Wind Farm Development

Atlantic Energy Partners (Pty) Ltd and
Genesis Eco-Energy Developments (Pty)
Ltd

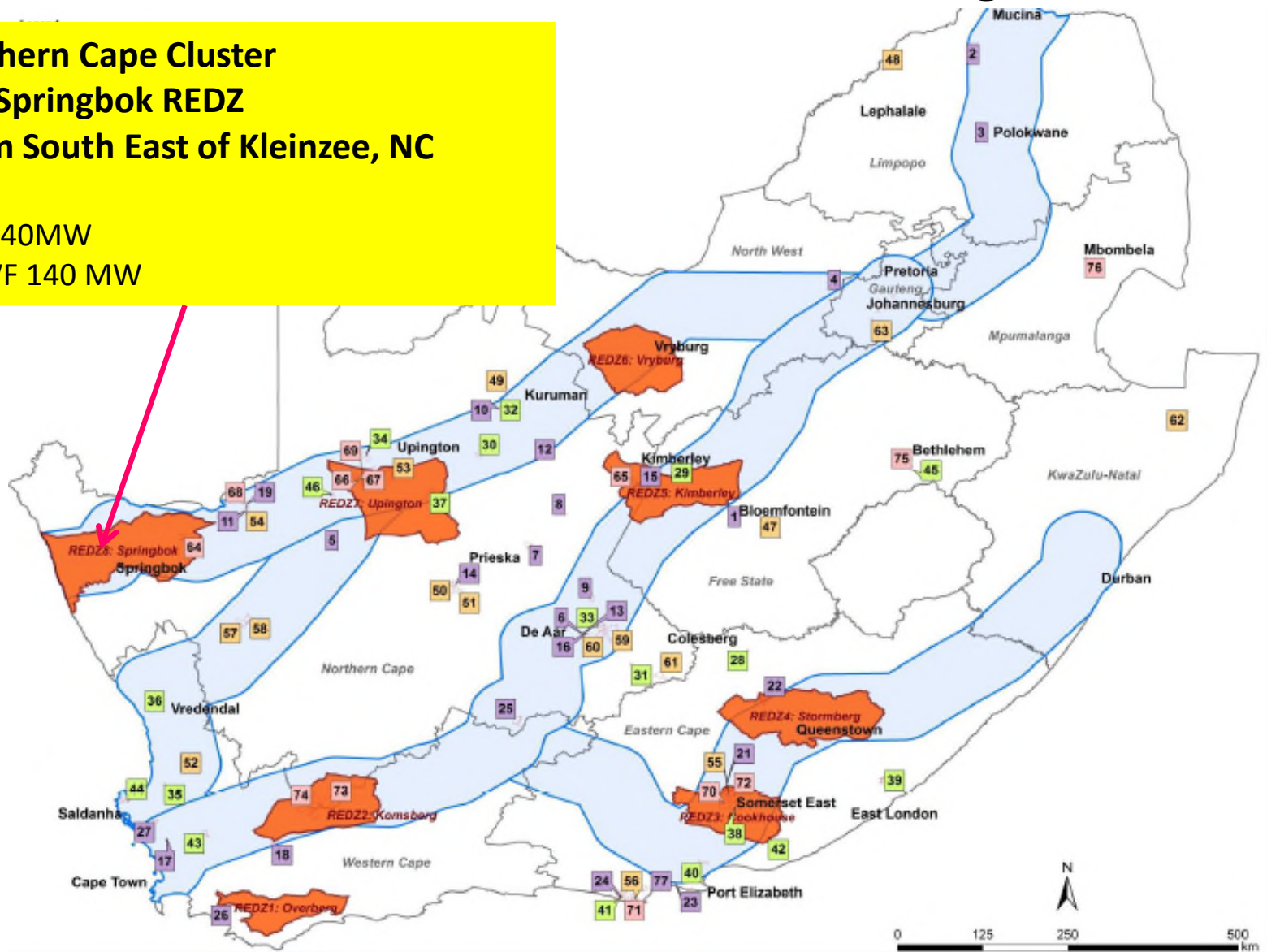
Rationale for Project Site Selection

- What makes a wind energy facility viable in the context of the RE power programme in South Africa
- As tariffs drop, projects need to find the most suited mix of development conditions to make them work
 - Good, to above average wind speed (7 to 7,5m/s +) at very least
 - Grid access nearby, grid servitude access, ROW - to reduce connection costs
 - Ease of access (national, provincial, local roads)
 - Least complex build and terrain
 - Mix of environmental/ecological factors that are not show stoppers
- Balance : Highest energy yielding wind farm, Government support, with least complex set of development constraints and permitting requirements

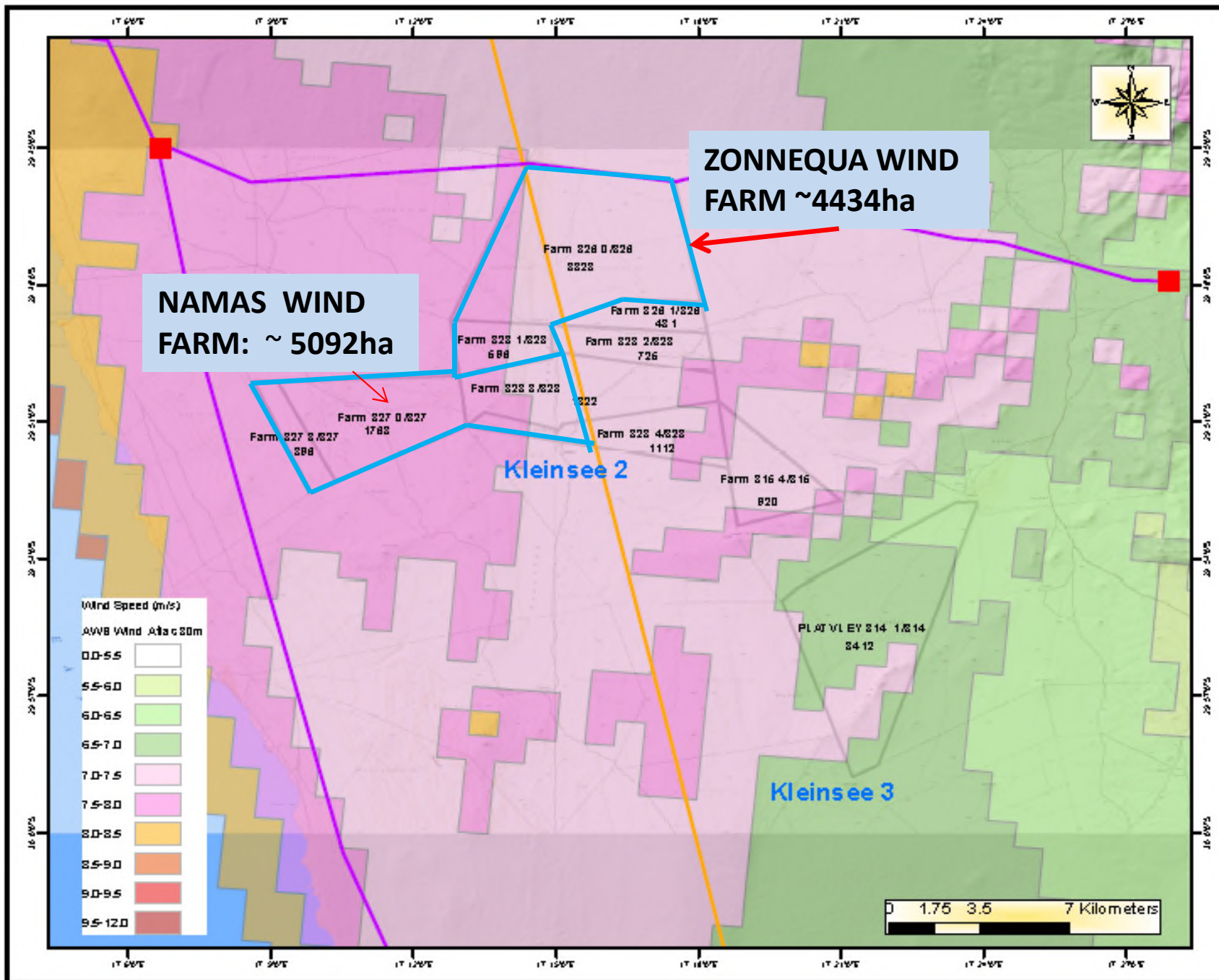
Alignment with Strategic Infrastructure Plan (Presidential Infrastructure Coordinating Committee)

Wind Northern Cape Cluster
Location - Springbok REDZ
Site – 20km South East of Kleinzee, NC

Namas WF 140MW
Zonnequa WF 140 MW



Location – Kleinsee REDZ, Northern Cape



KLEINSEE LOCATION & WIND ATLAS

Country	South Africa
Province	Northern Cape
District Municipality	Namasua
Local Municipality	Namaqualand

Farm Name	Area (ha)	Area (km²)
Farm 328 0/328	2228	2.228
Farm 328 1/328	481	0.481
Farm 328 1/328	698	0.698
Farm 328 2/328	726	0.726
Farm 328 3/328	322	0.322
Farm 327 0/327	1788	1.788
Farm 327 3/327	388	0.388
Farm 328 4/328	1112	1.112
Farm 316 4/316	820	0.820
PLATVLEI 314 1/314	2412	2.412

Projection: GCS, WGS84

Date: 20 February 2016

genesis
eco-energy
DEVELOPMENTS

www.glsreco.za

Extent of the Project

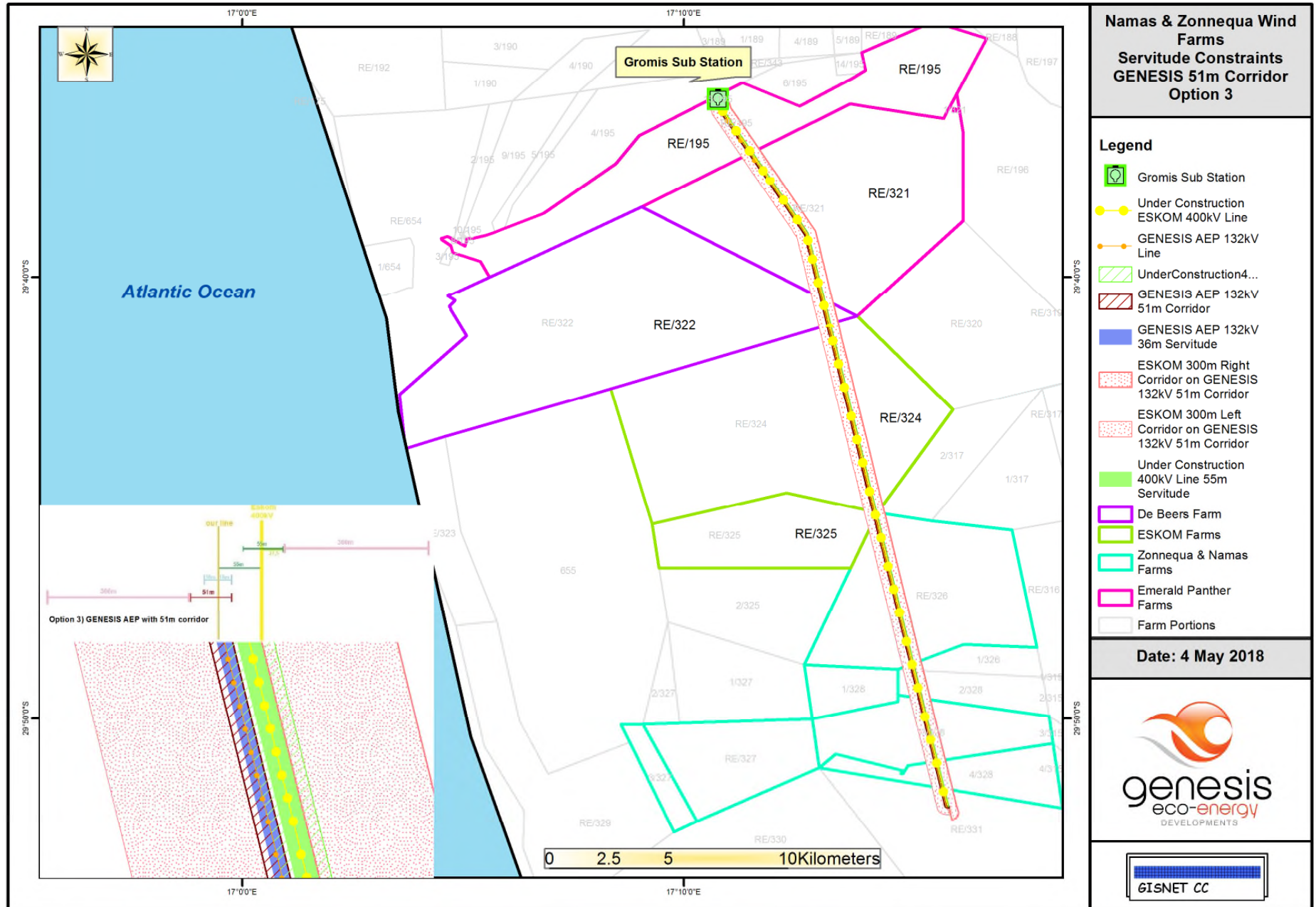
- Project extent

- Namas : 4 land parcels totalling ~5092ha
- Zonnequa: 2 land parcels totalling ~4434ha
- Each project site to accommodate up to 47 turbines, with maximum hub height of 130m, 205m tip height (blade length of 72m)

- Infrastructure

- Concrete turbine foundations and turbine hardstands;
- Temporary laydown areas which will accommodate the boom erection, storage and assembly area;
- Cabling between the turbines, to be laid underground where practical;
- An on-site substation of up to 100m x 100m (1ha) - connection between the wind farm and the electricity grid;
- An overhead 132kV power line, with a servitude of 32m, to connect the wind farm to the existing Gromis Substation;
- Access roads to the site and between project components with a width of approximately 8m;
- A temporary concrete batching plant; and
- Operation and Maintenance buildings including a gate house, security building, control centre, offices, warehouses, a workshop and visitors centre

Extent – Grid Line Access



Consideration from Specialist Studies

Ecologists Screening study

- CBA area to south of site, but not clear why as there are no obvious biodiversity areas/ factors of significance
 - Need to consult NCEC on CBA's
 - Namaqualand Salt Pan area to be avoided
 - Namaqualand coastal plain suitable for development
 - No intrinsic fatal flaws for the WEF's
-
- Turbine footprints have been moved away from the areas flagged by ecological study even though some are questioned
-
- The further studies during BA will confirm what has been found and further necessary adaptations made based on recommendations

Consideration from Specialist Studies

Bird study

- Namas has 3 Red Data species, but with very low passage rates
 - Report concludes the proposed site is low to medium-rich in threatened species
 - One area of High Sensitivity identified – Secretary Bird nest – may be impacted if turbines are erected nearby – buffer of 1km around nest
 - Over grazed landscape also considered as factor in limiting bird passage rates
- Zonnequa regarded as medium-rich in threatened species
 - Passage rates very low; risk to birds rated as very low in the report
 - Secretary bird nest (same pair from Namas); mitigation recommended
 - Mitigation recommended in medium risk areas – blade marking
 - Development can take place in medium-low risk in east of the site
- Turbine footprints have been moved away from the areas flagged as High Sensitivity or High Risk, as per the reports
- Staggered pylons and bird diverters to be used to mitigate collision with grid infrastructure

Consideration from Specialist Studies

Bat study

- 1st to 4th site visits concluded
 - Monitoring from 4 masts – met mast plus 3 x short masts
 - All prevalent species identified – 5
 - Preliminary High, Medium, Low sensitivity areas flagged
-
- Preliminary High Sensitivity areas have been identified and affected turbines moved out of these areas pending final report and recommendations.
 - In the Moderate Sensitivity areas other mitigation measures as recommended in final report will be implemented
 - Final report to be completed in late May – turbine positions will then be further adjusted to accommodate the recommendations from the completed studies