

THE BASIC ASSESSMENT FOR THE PROPOSED KOMAS WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR KLEINSEE IN THE NORTHERN CAPE PROVINCE.

APPENDIX C.13

Defence Site Sensitivity Verification



The Basic Assessment for the proposed Komass Wind Energy Facility and associated infrastructure near Kleinsee in the Northern Cape Province.

Defence Site Sensitivity Verification

Basic Assessment for the proposed development of the Komass Wind Energy Facility and associated infrastructure near Kleinsee in the Northern Cape Province

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Appendix C.13: Defence Site Sensitivity Verification

1 INTRODUCTION

This report serves as the Site Sensitivity Verification for Defence for the Basic Assessment (BA) for the proposed development of the Komass Wind Energy Facility (WEF) and associated infrastructure, near Kleinsee in the Northern Cape. The proposed project is being proposed by Genesis ENERTRAG Komass (PTY) Ltd, and forms part of a cluster of two WEFs, electrical grid infrastructure (EGI) and associated infrastructure. The second WEF, namely the Gromis WEF, as well as the associated EGI components will be assessed in separate BA processes which are currently being undertaken.

2 NEED FOR THE SITE SENSITIVITY VERIFICATION

On 20 March 2020, in Government Gazette 43110, Government Notice (GN) 320, the Department of Environment, Forestry and Fisheries (DEFF) published procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (Act 107 of 1998), as amended (NEMA) when applying for an Environmental Authorisation (EA). GN 320 prescribes general requirements for undertaking Site Sensitivity Verification, as well as protocols for assessment and minimum report content requirements of environmental impacts associated with specified environmental themes for activities requiring EA. GN 320 was enforced within 50 days of publication of the notice i.e. on 9 May 2020.

GN 320 specifically includes a protocol that provides the criteria for the specialist assessment and minimum report content requirements for impacts on defence installations for activities requiring EA. This protocol replaces the requirements of Appendix 6 of the 2014 NEMA Environmental Impact Assessment (EIA) Regulations (as amended).

This specific protocol states that proposed developments that occur on sites identified as Very High, High or Medium sensitivity, as depicted on the National Web-Based Environmental Screening Tool (Screening Tool), must include a Defence Compliance Statement. It further states that there are no requirements if the proposed developments occur on sites identified as Low sensitivity on the Screening Tool. However, a Site Sensitivity Verification is required for the Defence Protocol.

Therefore, since the proposed project requires an EA in terms of the NEMA EIA Regulations, 2014, as amended, and Defence was identified as a relevant theme for the Wind Methodology on the Screening Tool, as well as a required study, GN 320 must be complied with.

3 METHODOLOGY

The Site Sensitivity Verification Process and Report has been compiled based on the following methodology:

The Basic Assessment for the proposed Komass Wind Energy Facility and associated infrastructure near Kleinsee in the Northern Cape Province.

- Existing spatial databases were used to determine the location of defence installations in relation to the proposed project area, and to identify preliminary areas of concern in terms of impacts to defence installations;
- The proposed project site was plotted on the Screening Tool to identify the sensitivity allocated;
- A site visit was undertaken on 29 September 2020 to confirm the current land use and the environmental sensitivity as it relates to Defence;
- Additional research was undertaken to substantiate the Site Sensitivity Verification process; and
- A Site Sensitivity Verification Report was compiled (i.e. this report).

The information sources listed in Table 1 were used in the Site Sensitivity Verification process.

Table 1: Information Sources used for the Site Sensitivity Verification process

| Data / Information | Source | Date | Type | Description |
|--|--|------|-----------------------------|---|
| National Web-Based Environmental Screening Tool (Screening Tool) | Department of Environment, Forestry and Fisheries (DEFF) | 2020 | Spatial / Online Assessment | The Screening Tool is a geographically based web-enabled application which allows a proponent intending to submit an Application for EA in terms of the 2014 NEMA EIA Regulations (as amended) to screen the proposed site for any environmental sensitivity ¹ . |
| RSA Airspaces in 3D | Air Traffic and Navigation Services SOC Limited (ATNS) | 2020 | Google Earth KMZ File | The RSA Airspaces in 3D data KMZ file is an initiative undertaken by the ATNS to illustrate the definitions and complexities of airspace, routes, aerodromes and navigational facilities within South Africa to the public in the interest of safety ² . |
| Wind and Solar PV Phase 1 Strategic Environmental Assessment (SEA) | Department of Environmental Affairs (DEA) | 2015 | Report | SEA commissioned by the DEA [now operating as the DEFF) in 2013 for an assessment of wind and solar PV energy in South Africa, with an aim of identifying eight Renewable Energy Development Zones (REDZs) to focus and incentivize such development (i.e. Phase 1 REDZs SEA: CSIR Report Number: CSIR/CAS/EMS/ER/2015/0001/B). |
| Wind and Solar PV Phase 2 SEA | DEFF | 2019 | Report | SEA commissioned by the DEFF in 2016 for an assessment of wind and solar PV energy in South Africa, with an aim of identifying three additional REDZs to focus and incentivize such development (i.e. Phase 2 REDZ SEA. CSIR Report Number: CSIR/SPLA/SECO/ER/2019/0085). |
| Visual Impact Assessment for the proposed projects | SiVEST SA (Pty) Ltd | 2020 | Report | This Visual Impact Assessment was commissioned for the proposed project. |

¹ <https://screening.environment.gov.za/screeningtool/index.html#/pages/welcome>

² <https://www.atns.co.za/rsakmz.php>

Therefore, the Site Sensitivity Verification was undertaken using desktop analysis, satellite imagery, preliminary on-site inspection, and other available and relevant information.

4 PROPOSED PROJECT LOCATION

The proposed project is located entirely within the Springbok Renewable Energy Development Zone (REDZ 8), one of the eight REDZs formally gazetted in South Africa for the purpose of developing solar and wind energy generation facilities (GN 114; 16 February 2018). The proposed Komass WEF project is located on the following farm portions:

- Portion 1 of the Farm Zonnekwa No. 326 (Surveyor General (SG) 21 Digit Code: C05300000000032600001);
- Portion 2 of the Farm Zonnekwa No. 328 (SG 21 Digit Code: C05300000000032800002);
- Portion 3 of the Farm Zonnekwa No. 328 (SG 21 Digit Code: C05300000000032800003);
- Portion 4 of the Farm Zonnekwa No. 328 (SG 21 Digit Code: C05300000000032800004); and
- Portion 4 of the Farm Kap Vley No. 315 (SG 21 Digit Code: C05300000000031500004).

5 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

GN 320 states that prior to commencing with a specialist assessment, the current use of the land and the potential environmental sensitivity of the site under consideration as identified by the screening tool must be confirmed by undertaking a Site Sensitivity Verification. GN 320 further notes that the Site Sensitivity Verification must be undertaken by an Environmental Assessment Practitioner (EAP) or specialist with expertise in radar.

This Site Sensitivity Verification has been undertaken by Minnelise Levendal, an EAP at the CSIR. Minnelise Levendal is registered with the South African Council for Natural and Scientific Professions (SACNASP), with Registration Number 117078 in the field of Environmental Science. Inputs to the Site Sensitivity Verification Report were provided by Abulele Adams and Rohaida Abed of the CSIR. Refer to Appendix A of this verification for the declaration by the EAP.

6 FINDINGS OF THE SCREENING TOOL

A Screening Tool Report was generated for the proposed project using the following classification: Utilities Infrastructure → Electricity → Generation → Renewable → Wind.

The map of relative defence theme sensitivity generated and included in the Screening Tool depicted that the proposed Komass WEF project area is located in a low sensitivity area from a defence perspective i.e. there are no major or other types of defence installations or buffers that intersect with the project footprint (Figure 1).

In terms of GN 320, this means that no further requirements are applicable i.e. a Compliance Statement is not required, if the site is indeed found to be of low sensitivity during the site visit.

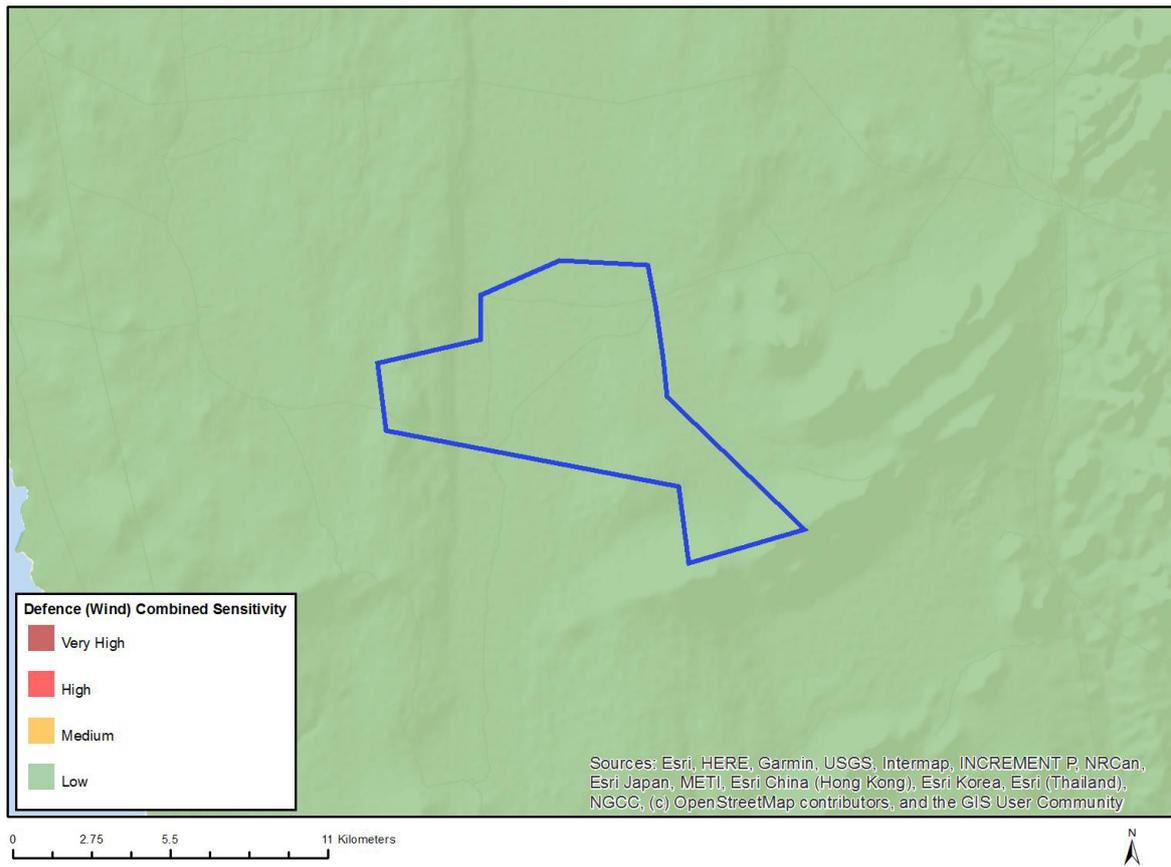


Figure 1: Screening Tool Map showing the Komas WEF Assessed Area in terms of Defence Sensitivity.

7 DETAILS OF THE SITE VISIT

The details of the site visit are noted below:

| | |
|---|------------------------------------|
| Date of Site Visit | 29 September 2020 |
| Specialist Name | Minnelise Levendal (EAP) |
| Professional Registration Number | SACNASP Registration Number 117078 |
| Specialist Affiliation / Company | CSIR |

8 FINDINGS

The site visit confirmed that the proposed project site is dominated by natural vegetation and that there are no areas of cultivation present on site. There are a few farmsteads on site. **No defence installations were found within the proposed project assessed area and footprint for the Komas WEF.** According to the Visual Impact Assessment, much of the area is characterised by natural vegetation which is dominated by Karoo and Fynbos shrubland. Refer to Figures 2, 3, 4 and 5 for views of the proposed project site.



Figure 2: View of the central area of the proposed Kommas WEF from the east viewed towards the south west



Figure 3: View of the northern area of the proposed Kommas WEF from the east viewed towards the south west

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Figure 4: View of the northern area of the proposed Komass WEF from the east viewed towards the west



Figure 5: View of the southern area of the proposed Komass WEF from the south viewed towards the north

The Air Traffic and Navigation Services SOC Limited (ATNS) data does not reflect any defence installations within the proposed project area or within a 30 km radius. The Screening Tool also does not show any defence installations in the proposed project area, and denotes the area as of

The Basic Assessment for the proposed Kommas Wind Energy Facility and associated infrastructure near Kleinsee in the Northern Cape Province.

low sensitivity. This is in line with the findings of the Phase 1 and Phase 2 Wind and Solar SEA Reports.

Refer to Appendix B of this chapter for a letter of no objection from the Department of Defence (dated 14 October 2020), which confirms that the proposed project area is not a concern from a defence perspective.

9 CONCLUDING STATEMENT

The proposed project site was determined and verified to be of low sensitivity (as it relates to defence installations). This was determined through a site visit and based on existing databases, and confirms the sensitivity allocated on the Screening Tool. Based on the above, in terms of GN 320, no further requirements are applicable i.e. a Compliance Statement is not required.

10 APPENDIX A: EAP DECLARATION

I, **Minnelise Levendal**, declare that –

- I act as the independent environmental assessment practitioner in this site sensitivity verification;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will perform the work relating to the site sensitivity verification in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I will take into account, to the extent possible, the matters listed in Regulation 13 of the Regulations when preparing the site sensitivity verification and any report relating to the site sensitivity verification;
- I undertake to disclose to the applicant and the Competent Authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the site sensitivity verification by the Competent Authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the Competent Authority, unless access to that information is protected by law, in which case it will be indicated that such information exists and will be provided to the Competent Authority;
- I will perform all obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

Disclosure of Vested Interest (delete whichever is not applicable)

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;
- ~~I have a vested interest in the proposed activity proceeding, such vested interest being:~~

| | |
|--|---|
| Signature of the Environmental Assessment Practitioner |  |
| Name of Company | CSIR |
| Date | 14 December 2020 |

11 APPENDIX B: DEPARTMENT OF DEFENCE LETTER OF NO OBJECTION

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Department:
Defence
REPUBLIC OF SOUTH AFRICA

C LOG/D FAC/R/401/1/3/11/3

Telephone: 012 402 2810
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E-mail: kebasenosi@yahoo.com
Enquiries: Lieutenant Colonel H.K. Zondi

Department of Defence
Logistics Division
(Directorate Facilities)
Private Bag X319
Pretoria
0001

14 October 2020

Genesis ENERTRAG Komas (Pty) Ltd
101B Heritage House
20 Dreyer Street
Claremont
7708

(Attention: The Directors)

LETTER OF NO OBJECTION: KOMAS WIND ENERGY FACILITY

1. The Genesis ENERTRAG Komas (Pty) Ltd letter dated 23 July 2020, requesting a Letter of No Objection from the Department of Defence (DOD) in respect of the proposed establishment of Komas Wind Energy Facility (WEF) near Kleinsee within the Springbok Renewable Energy Development Zone in the Northern Cape Province has reference.

2. The following procedures are applied by the DOD to evaluate the potential impact of the intended development on the DOD:

- a. Potential Impact on Landwards Activities. The potential impact of the intended development on landwards force preparation, employment and support is evaluated at the hand of the proximity of the intended development to military training areas and base areas; and possible limitations on the landwards movement and deployment of forces.
- b. Potential Impact on DOD Communication Installations. The potential impact of the intended development on DOD communication installation is evaluated by ascertaining whether the intended development intrudes into the DOD specified buffers around communication installations, as specified by the DOD Command Management and Information Services (CMIS) Division.
- c. Potential Impact on DOD Aviation Routes and Flight Safety. The potential impact of the intended development on military aviation is discussed and evaluated amongst applicable specialists from the South African Civil Aviation Authority (SACAA) and the South African Air Force (SAAF) as part of the proceedings of the Obstacle Evaluation Committee (OEC).



Lefapha la Bojphenselo, Umnyango wezokuVikela, Igqoro ya Tshireletso, ISebe lezokuKhuseko, Department of Defence, Mhaka wo Tshireletso
UmNyango WezokuVikela, Ndzawulo ya awa Vusirhetheli, Lehapha la Tshireletso, Department van Verdediging, UThixo leTelokwike

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3. The following was concluded after conducting the various evaluations:
- a. Potential Impact on Landwards Activities. The location of the proposed wind energy facility is not in the proximity of military facility and it is therefore not expected to have any impacts on the landward activities. There is no objection on the part of DOD landwards activities.
 - b. Potential Impact on DOD Communication Installations. The location of the proposed placement of Komass WEF is 52km South West from the closed SANDF Radio Site at Nababeep and falls outside the 5 – 10km radio frequency (RF) buffer for ultra-high frequency (UHF) sites. There is therefore no electromagnetic interference expected and no objection on the part of DOD communication installations.
 - c. Potential Impact on DOD Aviation Routes and Flight Safety. The proposed wind energy facility is located beyond the bounds of any aviation related buffers and holds no implication for the SAAF. There is no objection on the part of DOD aviation routes and flight safety.
4. Hope you will find this in order.

Yours faithfully



(BRIGADIER GENERAL X.B. NDLOVU)
CHIEF LOGISTICS: LIEUTENANT GENERAL

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