



an agency of the
Department of Arts and Culture

Gunstfontein WEF Case ID: 8383

African Clean Energy Developments (ACED)

South African Heritage Resources Agency (SAHRA)

Tuesday 12 April 2016.

SAHRA 111 Harrington Street Cape Town.

Meeting chaired by Phillip Hine (Acting head of SAHRA APM Unit)

Members Present: (See attached attendance register)

Richard Gordan (ACED)

James Cumming (ACED)

Phillip Hine (SAHRA)

Natasha Higgitt (SAHRA)

Cuan Hahndiek (SAHRA)

Members not Present:

Dumisani Sibayi (SAHRA)

Agenda:

1. Welcomes and apologies
2. Introduction
3. Presentation by African Clean Energy Developments regarding case 8383
4. Discussion
5. Way Forward
6. Thanks and closing.

Business

1. Welcomes and Apologies

SAHRA – Welcomes ACED.

- Apologies forwarded from D. Sibayi for absence.
- Apologies expressed for not being able to schedule the meeting earlier.

2. Introduction

SAHRA – Main purpose of meeting to gain clarity regarding turbines within the 3km proposed buffer zone from the R354 Verlatenkloof Pass. Information to be used to further inform the subsequent comment issued by SAHRA on the matter.

3. Presentation by ACED

ACED presentation on Gunstfontein.

- Gunstfontein Wind Energy Facility (WEF) located on plateau region
- Noted the approval of a series of WEF's located below the plateau already occurring along the R354, due for construction in 2016.
- The Gunstfontein WEF is situated within an area earmarked by government as a Renewable Energy Development Zone, and the project represents an exceptional wind energy resource area.
- Komsburg sub-station due to be upgraded by three (3) renewable energy IPPs in collaboration with Eskom in the area in order to facilitate a grid connection for those initial projects, which will allow for additional projects to connect.
- Afzelia conducted a Visual Impact Assessment (VIA) for the Gunstfontein WEF.
- **South Approach:** Visual Impact and sense of place when approaching from the south will already be impacted on already approved WEF's. (eg: Roggeveld, Soetwater and Karusa, the latter two facilities phases of the Hidden Valley set of sites)
- Gunstfontein WEF will not be readily visible from the south, a few blades visible from below and entering the Verlatenkloof Pass, and only visible in the periphery

- / rear once exiting the pass northwards. (this takes into account the removal of turbines 1 and 2 from the development)
- Removal of turbines 1 and 2 will make a marked improvement to the visual impact.
- **North Approach:** The Gunstfontein WEF is visible when approaching from the north for quite some distance (estimated 7km).
- The view from the north is less sensitive.
- Removal of turbines 1 and 2, has only a marginal improvement to the visual impact (due to the visual distance of the entire Gunstfontein WEF).
- Turbines are already set back from escarpment edge (the edge being noted as the most productive area for the WEF, highlighting the energy implications of such movements/setbacks).
- ACED feel 3km buffer may be excessive in this instance, especially considering that the turbines within this buffer are largely not seen from the road or the pass and when they are it is brief, limited to mostly blades and at a distance of at least 5.5km. Furthermore, this buffer would, in the removal of the 8 turbines as requested by SAHRA in the comment dated (18/03/2016), severely hamper the viability of the development by removing 8 of its most productive turbines.
- ACED propose the removal of turbines 1 and 2 only, this results in a buffer of approximately 1.5km from the R354 / Verlatenkloof Pass.

4. Discussion

With regard to SAHRA stipulation 3 (18/03/2016)

- *No turbines may be located within three (3) kilometers from the R354/R356. This is in line with comments issued on surrounding Wind Farm projects.*

SAHRA

- 3km buffer zone has been a general stipulation on all WEF's in the region although concessions have been made where acceptable with regards to specific cases depending on the nature of the proposed development.
- It is noted that wind farms have a major impact on the sense of place of a given region

- The Verlatenkloof Pass represents a Heritage Resource specifically (constructed by Thomas Baines) and as such is more significant than the rest of the R354 which is identified as a scenic route. Concern is expressed for the protection of the Verlatenkloof Pass as a heritage resource.
- The previously proposed turbines 1 and 2 were situated too close to the R354. (*ACED has already undertaken to have these two turbines moved as outlined above*)
- Savannah Environmental, (who undertook the Environmental Impact Assessment) have been involved several other WEF projects in the region and therefore should have been aware of the 3km buffer from the R354.
- The Roggeveld WEF (located to the south) had 16 turbines (14 Northern Cape and 2 Western Cape) allowed within the 3km buffer agreed to be SAHRA due to negotiations with Heritage Western Cape (HWC) and the developers as that project crossed provincial boundaries.
- SAHRA does not aim to be punitive in its stipulations, but is merely concerned with the protection of heritage, and as such does avail itself to negotiations where necessary and is open to engagement with developers and specialist input or assessment where meaningful.
- SAHRA requests a photomontage be created and submitted from the most northern part of the Verlatenkloof Pass (the most affected area as discussed) and from a portion within the pass where it was indicated (by John Marshall, Visual Impact Assessor of Afzelia Environmental Consultants) that the blades and the hubs would be briefly visible.
- It was noted that the Heritage Impact Assessment (HIA) conducted by Heritage Contracts and Archaeological Consulting (HCAC) did not examine the Verlatenkloof Pass as a Heritage resource, and in the meeting it was proposed that an updated HIA be submitted for the project reflecting this (including an assessment of the significance of the pass and comments from stakeholders relating to mountain passes in South Africa).

ACED.

- ACED is happy to provide the photomontages requested as well as facilitate a site visit with SAHRA.

- ACED is happy to provide SAHRA with additional information although has concerns regarding an updated HIA in that it would hamper the development in terms of the available timeframes provided by the Department of Environmental Affairs (DEA) given that the EIR is now in the DEA decision period and the suggestion was made by SAHRA outside of the Scoping Report commenting period and the EIA Report commenting period but more importantly that a full update is unnecessary in satisfying SAHRA's request for more information.
- With regards to the consultation regarding the mountain pass ACED were uncertain as to whether or not the stakeholders in question had been part of the public participation process; but did state that all required notifications and consultation with the interested and affected parties had followed due process and the issue had not been raised.
- ACED proposed to provide SAHRA with specialist input as part of the SAHRA commenting and engagement process in a manner that would not negatively impact on the development timeline of the project but still satisfy SAHRA's needs.
- SAHRA requested that the matter be discussed internally and that feedback would be provided to ACED by the end of the current week. (With regards to whether or not a revised HIA needs to be submitted or whether a supplementary specialist statement of letter would be sufficient).

With regard to SAHRA stipulation 5 (18/03/2016)

- *On-site monitoring of excavations deeper than 1m must be conducted by a qualified palaeontologist during the construction phase of any infrastructure located within the Abrahamskraal formation. Site monitoring reports must be submitted to SAHRA upon completion.*

ACED

- Proposed that the requirement for a palaeontologist was unnecessary, and that the on-site ECO could be trained to identify the relevant palaeontological materials. Proof of this training would be supplied to SAHRA for approval.
- Further suggested that a qualified palaeontologist could be requested to make regular visits to the relevant affected areas and provide comment and feedback to both the on-site ECO and to SAHRA.

SAHRA

- Accepts and endorses this alternative.
- Makes special note that foundations set within the Abrahamskraal formation are of particular sensitivity, and should be monitored more closely.

5. Way Forward

- ACED have undertaken to provide SAHRA with the aforementioned photomontages of the affected areas, within approximately two weeks.
- SAHRA will then conduct a site visit in order to make a field assessment to facilitate a well-informed and confident response.
- After this the final outstanding matters will be finalised.
- Both parties are in agreement regarding the palaeontological monitoring by a trained ECO (with proof of training presented to SAHRA), with punctuated site visits by a qualified palaeontologist (reports supplied to SAHRA).

6. Thanks and closing

ACED expressed thanks to SAHRA for availing itself to a meeting to discuss these matters.

SAHRA thanked ACED for presenting and providing greater clarity on the issues raised.

Meeting closed