

Proposed Albany Wind Energy Facility,
Makana Municipality, Eastern Cape

Comments on Revised Visual Impact Assessment

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Prepared for
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1 Purpose of this Review

Further comment on the revised Visual Impact Assessment (CES, March 2021) of the proposed Albany WEF was requested by Richard Summers Inc. The purpose is to determine if the review of 22 April 2021 has been addressed in the current VIA, particularly in relation to flaws that were previously highlighted.

The comments contained here refer to *Annexure A: I&AP Submissions Relating to the Draft VIA*. The Appendix includes responses to comments made by I&APs.

2 Visual Impact Mitigation

In response to the comment from I&APs that visual impact avoidance has not been implemented, a total of 23 wind turbines have been removed, including a number adjacent to Kwandwe Nature Reserve, although quite a few turbines would still be visible to Kwandwe and other sensitive receptors. Many of these are within high visual sensitivity areas, (see Para. 7 below).

3 Independence of Visual Specialist

CES maintain that, although they are the EAP tasked with getting the various permits for the proponent, they also offer independent specialist services, including visual impact assessments.

An independent review carried out by visual specialists (Oberholzer and Lawson, April 2020) indicates a number of gaps or flaws in the VIA, (see Paragraphs 4 and 7 below), which do not appear to have been addressed in the Final VIA by CES, or by their External Reviewer, (Nuleaf, March 2021). This raises serious questions about the efficacy of the VIA and the review process.

4 Visual Baseline Information

The original Review (Oberholzer and Lawson, April 2020), indicated that the baseline information to inform the layout of the WEF was inadequate, the response by CES being that the baseline information has been enhanced in the current VIA. However, significant gaps still exist in the type of information required to inform a layout, as indicated below, and therefore inadequate for decision-makers.

5 Site Verification

The requirement by DFFE that an initial 'Site Sensitivity Verification Report' for a development footprint needs to be included in the VIA Report does not seem to have been met, as there is no evidence of the DFFE screening report in the current VIA.

6 REDZ Visual Mapping

Although reference is now made to the REDZ Landscape Sensitivity Analysis in Section 4.3 of the VIA Report, no map or acknowledgement of the very high sensitivity areas are included in the Report.

7 Visual Sensitivity Mapping

Appendix 6(1) of the NEMA 2014 Regulations, a list of which is included in the VIA, specify the following requirement in Paragraph (h):

"a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivity of the site including areas to be avoided, including buffers"

This required visual sensitivity map is still missing from the current VIA. (The protected areas map and viewshed analysis maps in the VIA are not the same thing). The maps contained in the earlier Oberholzer / Lawson review have therefore again been attached for the updated layout. (Maps 5 to 18).

Although 23 wind turbines have been removed in the current layout, the visual sensitivity maps prepared by the Reviewers still indicate a number of turbines within buffers of sensitive or no-go areas as follows:

Map 5: Sensitive topographic features (turbine numbers 26, 27, 35, 44 and 55);

Map 6: Very steep slopes (>1:4), (turbine numbers 23, 35 and 59);

Map 8: Heritage sites, (turbine numbers 01, 02, 05 and 70);

Map 9: SAPAD nature areas (turbine numbers 10, 11, 13, 15, 16, 17 and 20);

Map 10: SANBI Provincial Reserves, (turbines 35 and 41);

Map 11: Guest farms and lodges, (turbines 10, 13, 15, 16, 24, 29, 31 and 32);

Map 12: Towns (Makhanda), (turbine 71);

Map 15: Scenic routes, (turbines 7, 9, 10, 11, 55 and 59);

Map 16: N2 National Road, (turbines 23, 24, 26, 27, 35, 55 and 59);

Map 17: Small airfield (as per CAA notification), (turbines 55, 58 and 59).

Map 18 provides a summary of wind turbines overlaid on visually sensitive areas.

The above sensitivity mapping indicates that a further 27 proposed wind turbines are problematic, but on which CES does not provide an opinion, possibly because they have not prepared similar maps of their own.

No clear reasons are given in the current VIA for the removal of 23 wind turbines from the layout. This is mentioned in the External Review by Nuleaf who state: "This Report (the VIA) however does not offer a reason as to why these specific 23 turbines were chosen to be removed".

Nuleaf also question the inclusion of 12 turbines within the Very High Landscape Sensitivity Class of the Cookhouse REDZ, and recommend the relocation or removal of these proposed turbines as a possible avoidance mitigation.

The fact that an additional 27 problematic turbines, mentioned above, remain a part of the layout indicates that the process has been selective and therefore possibly flawed.

8 Switching Stations and Construction Camp

The switching stations, powerline and construction camp are industrial type facilities close to the N2 National Road as indicated in the previous review. The visually intrusive siting of these has not changed, and the visual impact significance has been increased from 'low' to 'moderate' in the current VIA.

9 Aviation lights at night

The current VIA by CES includes additional information on the impact of aviation lighting at night, and now indicates on Page 152 that the ratings applicable for night lighting will be HIGH both before and after mitigation, particularly from the turbines in the western cluster adjacent to the Kwandwe Reserve and Indalo Protected Environment.

10 Conclusion

Although a number of gaps identified in the previous review have now been rectified in the current VIA, there is still no detailed visual sensitivity mapping, such as the maps attached below, on which the proposed layout is overlaid, as required by the NEMA Regulations.

Based on the visual sensitivity maps in this review, it is clear that there are still a large number of proposed wind turbines that are problematic and that the process lacks credibility.

Based on the above, we disagree with the conclusion by the External Reviewer (Nuleaf) that the VIA "represents an objective and consistent process that may be repeated by others, and which would produce the same results". Our own visual sensitivity analysis, as indicated in the attached maps, produce a significantly different result.