

ALBANY WIND ENERGY FACILITY
Makana Municipality, Eastern Cape

Review of Heritage Impact Assessment

Prepared for
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A. BACKGROUND TO THE REVIEW

A review of the Revised Heritage Impact Assessment (HIA) of the proposed Albany Wind Energy Facility (WEF) was requested by Richard Summers Inc. Attorneys, acting on behalf of Kwandwe Private Game Reserve. The HIA is titled as a "Phase 1 Archaeological Impact Assessment (AIA)" prepared by Booth Heritage Consulting (Pty) Ltd (August 2021) and forms part of the Environmental Impact Assessment (EIA) Report prepared by EOH Coastal & Environmental Services.

The main concern raised by Richard Summers Attorneys, on behalf of their client/s, is that the impacts on cultural landscape and sense of place have not been adequately.

B. PURPOSE OF THE REVIEW

The purpose of this review is to give an independent expert opinion on the adequacy and credibility of the HIA Report for the proposed WEF project, in particular the issue outlined above, and in terms of the following:

1. To identify any gaps, flaws or omissions in the HIA with an emphasis on landscape impacts and impacts on sense of place.
2. To identify whether the analysis of heritage impacts and the integration with the Visual Impact Assessment (VIA) is adequate.
3. A general assessment as to whether or not the level of information contained in the HIA Report is sufficient for decision-making purposes.
4. A reasoned opinion as to whether the proposed activity should or should not be authorised based on the heritage impacts.

C. ASSUMPTIONS AND LIMITATIONS

The review did not involve any fieldwork or ground-truthing, and assumed that the HIA Report would include all the relevant information. The review of the VIA was consulted due to the inter-relatedness of heritage and visual issues.

D. PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT

The report is essentially a Phase 1 Archaeological Impact Assessment (AIA) as reflected in the title of the specialist report. It does not meet the requirements of Section 38 of the National Heritage Resources Act (Act 25 of 1999; NHRA) as only impacts on archaeological resources

are addressed and not the full range of heritage resources contemplated therein. The report has been incorrectly listed in the EIA Report as a HIA report. Section 15 page 68 of the specialist report specifically mentions that the report is a Phase 1 AIA only and does not include or exempt other required specialist assessments as part of an HIA (Booth 2015).

E. CULTURAL LANDSCAPE ISSUES

There is an obvious absence in the heritage assessment of an adequate cultural landscape assessment including an assessment of the impacts (direct and cumulative) of the proposed WEF on landscape and sense of place. Given the scale and nature of the development, the consideration of landscape issues should be the primary driver of a meaningful and credible heritage assessment. It is mostly at this level of heritage assessment that potential “red flags” and “fatal flaws” can be adequately determined.

The sum total of heritage resources identified in the AIA includes the following:

- Middle Stone Age artefacts.
- Several stone packed features (kraals, farm boundary, foundations).
- The ruins of a church and associated graveyard.
- A historical wagon route parallel to the N2 near the entrance to Grobbelaar’s Kraal farm.

Section 8 of the AIA includes a general reference to the concept of cultural landscape and what these means from an archaeological, historical and contemporary landscape perspective. However, the concept is not taken further in terms of the identification, mapping and assessment of cultural landscape resources impacted by the proposed WEF.

Given the location of the proposed WEF in relation to the urban periphery is it possible that the some areas of the cultural landscape context are relatively resilient in terms of being able to absorb development. However, it is impossible to verify this statement without a level of ‘ground-truthing’ of the available information. Notwithstanding this possibility, the heritage component of the EIA needs to be expanded to adequately address all the requirements of Section 38 including impacts on the cultural landscape.

While the NHRA does not specifically mention the term “cultural landscape” it is implied in its definition of terms. Section 3 (2) (b) of the NHRA includes “landscapes and natural features of cultural significance” as part of the national estate.

Given the overlap of cultural landscape and visual issues, it is imperative that there is degree of integration of the heritage and visual assessments. This integration is currently absent. It is noted that that the review of the VIA has identified numerous problematic turbines in terms of visual sensitivity mapping taking into account heritage related issues such as topographical conditions, scenic routes and historical farmsteads.

E. REQUIREMENTS OF HIA REPORTS

Notwithstanding the EIA requirements for specialist reports, Section 38 (3) of the NHRA specifies the following minimum requirements for heritage assessments:

- (a) The identification and mapping of all heritage resources in the area affected.
- (b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7.
- (c) an assessment of the impact of the development on such heritage resources.
- (d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development.
- (e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources.
- (f) if heritage resources will be adversely affected by the proposed development, the consideration of alternatives.
- (g) plans for mitigation of any adverse effects during and after the completion of the proposed development.

These requirements have not yet been addressed with respect to cultural landscape resources.

In order to adequately address landscape issues the nature and degree of heritage significance and sensitivity of the receiving environment needs to be assessed across different scales of analysis at the regional and local scales, and in terms of the relative intactness, representivity and rarity of the resources. This needs to inform a set of consolidated constraints including no-go areas.

H. CONCLUSIONS AND RECOMMENDATIONS

The assessment of heritage impacts has not been adequately undertaken in terms of the following:

- The HIA report is essentially a Phase 1 Archaeological Impact Assessment, which does not meet the provisions of Section 38 (3) of the NHRA.
- The report focuses on archaeological issues with an absence of an assessment of impacts on cultural landscape and sense of place.
- There is no integration of the heritage and visual assessments.

Therefore, the heritage component of the EIA report is incomplete and insufficient for decision-making purposes. It recommended that the EIA process be set aside until the heritage component has been adequately addressed and the provisions of Section 38 (3) have been met including a cultural landscape assessment.

REFERENCES

Booth, Celeste (2021). Revised Phase 1 Archaeological Impact Assessment for the Proposed Albany Wind Energy Facility (WEF) and Associated Infrastructure, situated near Grahamstown, Makana Local Municipality, Sarah Baartman District Municipality, Eastern Cape Province

Winter, S. and Baumann, N. (2005). Guidelines for involving heritage specialists in EIA processes: Edition 1. CSIR Report No ENV-S-C 2005 053 E. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town

ADDENDUM A:

Declaration of Independence:

Sarah Winter declares that she is an independent heritage practitioner with expertise and experience in heritage impact assessments and that the review has been carried out in an objective manner. She has no interest, be it business, financial, personal or other, in the proposed Albany Wind Energy Farm other than fair remuneration for professional work performed in connection with a review of the Heritage Impact Assessment.

Expertise:

Name	Qualification	Professional Accreditation	Years of Experience
Sarah Winter	BA Archaeology and Anthropology (UCT) 1989 Master of City and Regional Planning (UCT) 1995	Association of Heritage Practitioners (Accredited member)	Heritage practitioner 20 years

Sarah Winter has 20 years of experience as a heritage practitioner with extensive experience in undertaking heritage impact assessments. She co-authored the Department of Environmental Affairs and Development Planning Guidelines for Involving Heritage Specialists in Environmental Impact Assessments (2005). Her specific area of expertise is in cultural landscape assessments undertaken as part of heritage impact assessments, municipal heritage inventories, conservation management plans and planning policy frameworks. She also co-authored the specialist Heritage and Scenic Study for the Western Cape Provincial Spatial Development Framework (2013).

Sarah is a founder member of Association of Professional Heritage Practitioners. She has taught on the Robben Island Museum-University of the Western Cape Heritage and Museum Studies Programme, the University of Cape Town Landscape Architecture Masters Programme and the UCT MPhil in Conservation of the Built Environment Programme.

Sarah served on the Councils of Heritage Western Cape (HWC) (2010 – 2016) and the South African Heritage Resources Agency (SAHRA) (2015 – 2016). She chaired the HWC Built Environment and Landscape Committee (BELCOM) (2010 – 2016) and was a member of the HWC Impact Assessment Committee (IACOM) (2010 – 2013). She is currently a member of the HWC IACOM (2019 onwards).