

Philip Rosenthal

From: Philip Rosenthal [mailto:PhilipRosenthal.com]
Sent: 05 December 2013 10:04 AM
To: 'SGrobbelaar'
Subject: FW: Correcting Mapping Errors in Northern Cape PSDF

Attachments: Namaqua District CBA's & ESA's broader scale.pdf; Namaqua district CBA& ESA's2.pdf; Namaqua district CBA& ESA's (sans protected areas).pdf; Composite spatial vision.jpg; Biodiversity conservation.jpg; Biosphere reserves.jpg



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Composite spatial vision.jpg (...
Biodiversity conservation.jpg
Biosphere reserves.jpg (118 KB

Dear Mr

Grobbelaar

Further to my email below, I have now had confirmation that the Namaqua District Biodiversity Sector Plan has now been adopted by the competent authority (the Northern Cape Province Government), which means that it does have legal status. I have requested the environmental department to clarify whether that legal status applies outside of Namaqua District and am awaiting a response.

Philip Rosenthal

-----Original Message-----

From: Philip Rosenthal [mailto:PhilipRosenthal.com]
Sent: 04 December 2013 02:08 PM
To: 'SGrobbelaar'
Subject: Correcting Mapping Errors in Northern Cape PSDF

Dear Mr Grobbelaar

Thank you for raising this question. The Northern Cape PSDF (2012) and its associated online mapping tool designate the site as part of the Augrabies National Park, a Biosphere Reserve and a Critical Biodiversity Area and maps it outside the 'Solar Corridor'. Please see response below:

* The proposed site (Farm Rooipad 9/15) is mapped in the Northern Cape PSDF eg. page89 as a 'formal protected area' as part of the Augrabies National Park.

Response:

- This is a mapping error, about which I wrote to National Parks and South African Biodiversity Institute (SANBI) in 2011 and in which they acknowledged as an error which they said they would correct. It appears the error has not yet been corrected and has now found its way into the PSDF, which is using SANBI data. The 'Open Street Maps' database gives the correct boundaries for the Augrabise National Park. I discuss this mapping error in the Draft Basic Assessment Report pages 5-6. The land in fact has no special conservation status.

* The proposed site is included in the 'core area' of a proposed "Augrabies Biosphere Reserve".

Response:

- Firstly, I was not able to find any reference to this outside the PSDF

and thus am not aware of any statutory or UNESCO status to this proposal.

- Secondly, if this was designated a Biosphere Reserve, then a Biosphere Reserve can include other land uses but these need to be planned carefully in a compatible manner.

- Thirdly, the designation as part of the core area of the proposed Biosphere reserve appears to be based on this mapping error which assumed the land was part of the National Park. All the other parts of the proposed Biosphere Reserve fall within the National Park and there seems no other logical reason to add this to the Park.

- Fourthly, the boundaries of the National Park appear to have been motivated mainly to protect the scenic beauty of the Orange River Canyon.

Neither the proposed site nor the immediately adjacent land in the National Park is part of a threatened ecosystem.

- Fifthly, there are threatened ecosystems immediately adjacent to the Orange River, which motivate protection of remaining indigenous vegetation and possibly restoration of some of what has been lost. But development away from these threatened ecosystem areas, is ecologically preferable and more desirable. The Augrabies PV project is not in these threatened ecosystem area.

- Sixthly, given that this is not a biodiversity hotspot, it does not appear to fit the criteria for UNESCO recognition as a 'Biosphere Reserve' (unlike for the example the Kogelberg and West Coast Biosphere Reserves. The Augrabies Falls and Orange River Canyon are more likely to qualify for UNESCO recognition as a 'World Heritage Site'. See the criteria at the links below.

https://www.environment.gov.za/sites/default/files/docs/forms/nomination_for_m.pdf

m.pdf

<http://www.unesco.org/mab/doc/faq/brs.pdf>

There are numerous other biodiversity hotspots in South Africa which better fit the UNESCO criteria but have not yet been designated Biosphere Reserves.

http://en.wikipedia.org/wiki/World_Network_of_Biosphere_Reserves_in_Africa#South_Africa

outh_Africa

* The Northern Cape PSDF maps the area as a "Critical Biodiversity Area".

Response

This is on many counts incorrect. The Northern Cape PSDF cites their source of information as the South African Biodiversity Institute (SANBI).

- Firstly, Critical Biodiversity Areas based on Fine Scale Mapping have not yet been determined for this local or district municipal area of the Northern Cape.

- Secondly, the maps in the PSDF appear to be based on the Namaqua District Biodiversity Sector Plan, which maps that district for 'CBA type 1' but the maps for that district do demarcate 'CBA type 2' and 'ecological support areas' in other districts including the Augrabies area. (Please see attached SANBI maps).

- Thirdly, at last enquiry (2012) with the Northern Cape Province, the Namaqua District Biodiversity Sector Plan had not yet been formally adopted by the Province and until adopted does not have legal status.

- Fourthly, the Namaqua District Biodiversity Sector Plan does not designate the proposed site as a Critical Biodiversity Area (CBA), but rather as an 'Ecological Support Area' which is a very different

conservation status to CBA.

- Fifthly, most of the irrigated agriculture of the Orange River valley is given the same 'Ecological Support Area' status (see map attached).

(a) Irrigated agriculture usually involves total transformation of land use including removal of all indigenous vegetation, while this PV proposal does not and is reversible.

(b) Much of the irrigated agriculture adjacent to the Orange river is located on 'threatened ecosystem' land, while this PV proposal is not.

* The site is mapped as a 'Core Area'.

Response:

- The Northern Cape PSDF report lists criteria for subcategories of Category

A: 'Core Conservation Area' (pages 95-97). All of these are statutory conservation status criteria. There is no statutory conservation status to the site for the Augrabies PV project (Farm Rooipad 9 of 15). Thus I submit this farm was included in error.

- If the land was not designated 'Core area' it would possibly then by default fall into the category of "Buffer". The Northern Cape PSDF (p102) includes a list of sub-categories of 'Buffer areas'. Included in this is a list of permissible land uses such as ecological corridors and private conservation. Agricultural and industrial are not included. The difficulty with implementation is that a major proportion of the land designated as 'buffer' is already developed for other intensive land uses such as irrigated agriculture, which fall under 'Category C'.

* The proposed site is outside the mapped Solar Corridor (C1.2)

Response:

The Northern Cape PSDF defines a 'Solar Corridor' which it defines page 68 as "This corridor centres around Upington and extends from roughly Kakamas in the north to De Aar in the east". The proposed site is 35 km from Kakamas. The 'Solar corridor' is mapped on Plan C1.2 as north of the Orange River Valley and not including the towns of Keimoes, Kakamas or Augrabies.

Why this apparent contradiction between the written text and the drawing? I appears that the Northern Cape PSDF was mapping the Solar Corridor in a broad 'broad brush' manner and the map is not meant to strictly limit solar development outside of this corridor. Many of the approved Solar Projects in the Northern Cape do not fall within this mapped corridor. In fact the proposed site is closer to the mapped 'Solar Corridor' than the town of Kakamas which is included in the text description of the corridor.

- Renewable Energy Structures need to preferably be located near to existing substations and within the High Solar Radiation areas. These locations will at times fall outside the mapped Solar corridor. One of the Solar Energy Sites currently under construction is near to the town of Pofadder which is much further from the Solar Corridor.

* Renewable Energy and Solar Energy specifically is promoted in numerous places throughout the Northern Cape PSDF. Renewable Energy Structures are designated land use F(i) on page 138. The other infrastructure structures listed in the same category are distributed throughout the landscape (e.g.

dams, roads, telecommunications) within other land uses mapped in the PSDF and it is argued that Renewable Energy structures should also be so.

I would argue therefore, that the proposal is compliant with the Northern

Cape PSDF taking into account the necessary mapping corrections cited above.

Yours sincerely,

Philip Rosenthal

-----Original Message-----

From: SGrobbelaar [mailto:SGrobbelaar@ncpg.gov.za]

Sent: 02 December 2013 04:29 PM

To: Philip Rosenthal

Subject: Augrabies PV Bar

Phillip

Na verdere ondersoek oor die voorgestelde son energie ontwikkeling, blyk dit dat dit binne die "Core" area in die Provinsiale SDF val en dat ontwikkeling van die aard nie binne die gebied toelaat word nie.

Groete

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