

**Our Reference: J30212 St Helena Watercourse Crossing**  
**DEA Reference: 14/12/16/3/3/1/652**  
**DEA&DP Reference: 16/3/1/6/6/F2/5/3207/12**



**Tshwane**

12 December 2012

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**Attention:**

Ms C George  
Western Cape Department of Environmental Affairs and Development Planning  
Directorate: Land Management  
Region 2

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Dear Madam

**COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ST HELENA WATERCOURSE CROSSING (DEA REF NO: 14/12/16/3/3/1/652), ST HELENA BAY, WESTERN CAPE PROVINCE**

Your letter dated 29 October 2012 has reference. GIBB (Pty) Ltd (GIBB) would like to thank you for your inputs into the Basic Assessment Process, and would like to respond to your letter as follows:

Electrawinds Seeland Pty Ltd. (the Applicant) proposes the optimisation of an existing access road (of approximately 66.4m) across a non-perennial drainage line on Farm Langeklip (Erf 47) near St Helena Bay within the Saldanha Bay Municipality in the Western Cape Province. The modification of the access road is required as supporting infrastructure to the **approved** wind farm development known as St Helena wind farm (DEA Reference Number: 12/12/20/2157).

This Basic Assessment (BA) is being undertaken due to listed activity 11 of GN544 not being included in the environmental authorisation obtained for the approved St Helena Wind Farm. As per the Department of Environmental Affairs comments (attached as Appendix I to the Final BAR), the impacts associated with watercourse crossings were assessed within the Wind Farm EIA Report, and was just not specifically applied for. Thus this BA is as a result of this omission and now specifically states that an existing access road crosses a non – perennial watercourse and will be widened and hardened. The existing farm road is a narrow track of approximately 3m in width, which would be widened and compacted to a width of 5m with additional vegetation clearance of up to 1.5m on either side for electrical cabling (connecting Turbine 2 to the rest of the Wind Farm) to be laid down. The affected length of the access road triggered by the listed activity (currently not approved), is approximately 66.4 meters.

Please refer to the Final Basic Assessment Report (attached) which clarifies most of the comments raised and sheds more light on the project.

Herewith find attached 1 electronic copy and 1 hard copy of the Final Basic Assessment Report for your perusal.



GIBB Holdings Reg: 2002/019792/02  
Directors: R. Vries (Chairman), Y. Frizlar, B. Hendricks, M. Mayat

Arcus GIBB (Pty) Ltd, Reg: 1992/007139/07 is a wholly owned subsidiary of GIBB Holdings.  
A list of divisional directors is available from the company secretary.



Please note that the engineers on the project have now determined that due to the soil conditions present **listed activity 18 of GN 544 is triggered:**

18) The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock or more than 5 cubic metres from:

**(i) a watercourse;**

(ii) the sea;

(iii) the seashore;

(iv) the littoral active zone, an estuary or a distance of 100 metres inland of the high – water mark of the sea or an estuary, whichever distance is the greater-

but excluding where such infilling, depositing, dredging, excavation, removal or moving;

(a) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or

(b) occurs behind the development setback line.

An amended application form will be submitted to the DEA for this listed activity.

With regard to the alternatives proposed, technology alternatives are the only alternatives available to the project (as outlined in the Draft BAR). There are no feasible site, layout or activity alternatives. The box culvert structure that is proposed is the most effective way to widen the existing crossing. The need and desirability section and Section B(4) has been updated and clarified.

Please refer to Appendix E of the Final BAR for proof of public consultation (this proof was not available at the time of release of the Draft BAR). The I&AP database that was used was the same database as the St Helena Wind Farm and all I&APs were notified of the availability of the Draft BAR.

The Western Cape Department of Agriculture has provided comment on the Draft BAR (as attached in Appendix E of the Final BAR). Cape Nature has been consulted and their comments are addressed within the Comment and Response Report (CRR) and attached as Appendix E of the Final BAR. GIBB is therefore of the opinion that there are no serious flaws in the public participation process that has been followed.

The Ecological Specialist Report assessed the entire site for the St Helena Wind Farm, and the study assessed the impacts on watercourses. The study outlined certain mitigation measures to limit the severity of the impacts on the watercourse (as outlined in Section D2 of the Draft BAR). It should be kept in mind that this study was approved as part of the St Helena Wind Farm development. Please refer to Section D2 of the Final BAR which outlines the impact assessment methodology used and the report addresses the most significant impacts related to the project.

Please refer to Appendix F of the Final BAR for the revised EMP. Based on the nature and scale of the development as well as the status of the drainage line, it was determined that it is not necessary to compile a storm water and erosion management plan at this stage. As stated in the EMP the Environmental Control Officer (ECO) will determine if an erosion and storm water management plan needs to be compiled based on the site and climate conditions at the time of construction.

Should you have any further comments please submit them directly to the Case officer:

Toinette van der Merwe  
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Integrated Environmental Authorisations  
Email: Tvandermerwe@environment.gov.za  
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Please copy GIBB in all communication:

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The Administrator  
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Please do not hesitate to contact me should you have any queries.

Kind Regards



**Elisabeth Nortje**  
for GIBB (Pty) Ltd