

**BOULDERS WIND FARM, WESTERN CAPE PROVINCE
COMMENTS AND RESPONSES REPORT**

WRITTEN COMMENTS RECEIVED DURING THE REVIEW PERIOD OF THE SCOPING REPORT, 1 MARCH – 3 APRIL 2018

NO.	COMMENT/ISSUE RAISED	RAISED BY	RESPONSE
1.	Is it possible to confirm if the draft scoping report has been made available for comment?	Beatrix Spargo Conservation Webber Wentzel Email: 26-02-2018	The Scoping report was made available for a 30-day review period from 01 March 2018 – 03 April 2018. Notification regarding the availability was distributed to registered I&APs on 28 February 2018.
2.	Some of the other residents in the area have received info re the proposed site map etc. for the wind farm. Please could you forward this to me.	Anerike Feldtmann Britannica Heights St Helena Bay Email: 26-02-2018	The EAP confirms that no layout map (i.e. site map) has been made available to any community members. The layout map will be made available for review during the EIA Phase. Refer to Appendix C for confirmation of this correspondence.
3.	I was a representative of the Paternoster tax payers association for 7 years and on the Saldanha Bay Municipality's aesthetics committee for 10 years. Currently I am working with 'Aksie Paternoster Action' for cases that become interests or concerns of the Paternoster community. I will provide input once further details of the project are provided.	Alvin Roon Architect and organiser action Paternoster Reply Form: 27-02-2018	Mr. Roon has been registered as an I&AP on the project database. Notification regarding the availability of the Scoping report was provided to the I&AP on 28 February 2018 in order to provide him with the necessary information and the opportunity to comment.
4.	1) Paternoster Beleggings Trust owns the following three farms: 44/23 45/23 RE 43/23	Mariana van der Meer Paternoster Beleggings Trust:	It is noted that the I&AP is a resident of Paternoster. In order to assess the comments raised by the I&AP the following studies have been undertaken during the Scoping phase and the impacts identified will be ground-truthed and assessed further during the EIA Phase:

	<p>2) Seven families are living on RE 43/23. Their houses are on the northern border adjacent to Schuitjies Klip 3/22.</p> <p>3) These families will be dramatically affected by the project.</p> <p>4) Concerned in terms of the aesthetic/visual effect of the large structures (up to 165m) with the flickering red lights in the evening and turning turbines. The current lifestyle is a calm farm area.</p> <p>5) We are also concerned about noise and health impacts of the electric magnetic fields etc.</p> <p>6) Both farms 44/23 and 45/23 have rights for a farmhouse and a house for a manager. Further accommodation will be constructed (subject to municipal approval). These rights will be impacted for the same reasons as laid out in 2-4 above.</p> <p>7) We are also concerned about what the impact will be on the birds in the area.</p>	<p>44/23 45/23 RE 43/23</p> <p>Email: 28-02-2018</p>	<ul style="list-style-type: none"> » A Visual Scoping Study (Appendix L of the Scoping report) and a Visual Impact Assessment (EIA phase) to assess the visual impact of the Boulders Wind Farm on the surrounding environment. This will also include the night time lighting of the facility. » A Noise Scoping Study (Appendix K of the Scoping report) and a Noise Impact Assessment (EIA phase) to assess the noise impact of the development. It must be noted that the specialist has recommended a 500m buffer around all homesteads within which no turbines may be placed in order to ensure that noise impacts on the residents of the homesteads are acceptable. » It is well known that majority of health impacts from wind farms are caused by the noise of the wind turbine generators. These impacts are addressed in the noise report. With regards to electromagnetic impacts, wind turbines are known for low EMI emissions, and there are no known health impacts of electromagnetic fields over and above those caused by modern electrical appliances such as portable radios, fluorescent lights and television broadcasting. » A Social Scoping Study (Appendix J of the Scoping report) and a Social Impact Assessment (EIA phase) to assess the social impact on the social structures and residents within the area. » An Avifauna Scoping Study (Appendix F of the Scoping report) and an Avifauna Impact Assessment to assess the impact on birds within the project site and the surrounding areas. <p>Considering the location of the properties listed in the comment, which are located directly to the west of the northern portion of the project site, and the sensitivity analysis which identified the area with the highest potential for development to be the southern section of the project site, the potential for direct impact in these</p>
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			properties is low.
5.	I please need a clear map of the area where these turbines are proposed to be placed. The maps we have received to date and in the booklet is by far not clear enough for us to see. Most of the residents do not know the farm names, so it is of not much use to us using the farm names. We need a map with the whole area which will be affected by these turbines and on the same map including Britannica Heights's position to the proposed sites. The positions of the turbines to be clearly marked on this map. Kindly email to me. It will be much appreciated.	Christa Botha Journey's End S/C Email: 28-02-2018	The Boulders Wind Farm is still in the Scoping phase of the EIA process. During the Scoping phase the environmentally sensitive areas within the project site has been identified that needs to be considered by the developer for the design of the layout. Therefore, the layout of the development footprint is not available yet and will be made available for review and comment during the EIA phase and as part of the EIA report.
6.	You are required to submit a hard copy of the draft Scoping Report to this Department for comment.	Keagan-Leigh Adriaanse Development Management Region 1 Western Cape Department of Environmental Affairs and Development Planning Email: 01-03-2018	One hard copy and 3 x CD versions of the Scoping Report were submitted to Adri La Meyer, Environmental Officer, of the Western Cape Department of Environmental Affairs and Development Planning via courier on 28 February 2018. Adri La Meyer acknowledged receipt of the Scoping Report on 01 March 2018 and confirmed that Keagan-Leigh Adriaanse of Development Region 1 would receive a copy of the Scoping Report.
7.	Please mark copies of the DSR for my attention please. I require 3 copies at this stage. Preferably CDs, as I am trying to save the applicant cost. If you can provide a hard copy for Keagan, then it would be great. If not, not a train smash as there is nothing in the Act that says that commenting authorities must receive a hard copy.	Adri La Meyer Environmental Officer Western Cape Department of Environmental Affairs and	One hard copy and 3 x CD versions of the Scoping Report were submitted to Adri La Meyer, Environmental Officer, of the Western Cape Department of Environmental Affairs and Development Planning via courier on 28 February 2018. Adri La Meyer acknowledged receipt of the Scoping Report on 01 March 2018.

		Development Planning Email: 01-03-2018	
8.	As long as the monitoring was done correctly according to the guidelines between 2014 – 2016 (this document was not yet available at the Scoping Phase). Please can we review this? It is also very important that operational mitigation is fed into the EMP and Cumulative Impacts are assessed and mitigated against. We would like to review the EIA and EMP when they are ready.	Kate MacEwan Chairperson South African Bat Assessment Association (SABAA) Email: 01-03-2018	The Bat monitoring was undertaken as per the guidelines of 2014. The monitoring data will be used by the bat specialist to inform the Bat Impact Assessment to be undertaken in the EIA phase. All mitigation measures for the operation of the Boulders Wind Farm relating to bats will be included in the EMP as part of the EIA report. Cumulative impacts will also be assessed as part of the EIA report. The EIA report will be made available for a 30-day review period in order for the I&AP to comment on the findings of the EIA report and Bat Impact Assessment, which then will include the monitoring data.
9.	I have received the documents, thank you very much. They are at Registry now.	Adri La Meyer Environmental Officer Western Cape Department of Environmental Affairs and Development Planning Email: 01-03-2018	It is noted that the Western Cape Department of Environmental Affairs and Development Planning received the Scoping report on 01 March 2018.
10.	I am busy with this, we have a number of entities which are all affected in different ways. In working through our responses though, I got confused. You indicated 13/23 as the area closest to us, our records however	Deon Brand Adjacent Landowner Strandloper	There are ten affected properties which form part of the project site, including: » Boebezaks Kraal 2/40 » Boebezaks Kraal 3/40 » Boebezaks Kraal 5/40

	shows this as Portion 6 of Farm 23. Can you please clarify what the correct description of the properties are that form part of the wind farm application – if portion 6 of 23 and portion 13 of 23 are included or is it only portion 6, which is the farm indicated on your maps but incorrectly labelled as Portion 13 of 23?	Investment Trust Email: 01-03-2018	<ul style="list-style-type: none"> » Frans Vlei 2/46 » Schuitjes Klip 3/22 » Schuitjes Klip 1/22 » Davids Fontyn 9/18 » Davids Fontyn 7/18 » Het Schuytje 1/21 » Uitkomst RE/6/23 <p>This therefore confirms that the correct property number is portion 6 of farm 23 (i.e. Uitkomst RE/6/23).</p>
11.	<p>The response from SABAA on this project is as follows:</p> <p>From what we read, the correct processes are being followed. We would however like the monitoring report from the fieldwork done between 2014 – 2016 (this document was not available on your website).</p> <p>It is also very important that operational mitigation is fed into the EMP and subsequently into the EA and Cumulative Impacts are adequately assessed using data from the preconstruction on site survey and operational facilities in similar habitats and mitigated for accordingly.</p>	<p>Kate McEwan Chairperson</p> <p>South African Bat Assessment Association (SABAA)</p> <p>Email: 05-03-2018</p>	<p>It is noted that SABAA confirms that the processes being followed for the assessment of the impact on bats is as per the Best Practise Guidelines. The monitoring data will be used by the bat specialist to inform the Bat Impact Assessment to be undertaken in the EIA phase. All mitigation measures for the operation of the Boulders Wind Farm relating to bats will be included in the EMPr as part of the EIA report. Cumulative impacts, through the consideration of the monitoring data by the bats specialist, will also be assessed as part of the EIA report. The EIA report will be made available for a 30-day review period in order for the I&AP to comment on the findings of the EIA report and Bat Impact Assessment, which then will include the bat monitoring report.</p>
12.	<p>We have a number of projects which are affected by the proposed project. I attach herewith the completed registration form of the Strandloper Investment Trust as an I&AP. I will in due course send you the details of the other entities which are affected.</p> <p>I have divided concerns under two headings:</p> <p>(i) General concerns which affect Paternoster as a whole; and (ii) Specific concerns which affect the Strandloper Investment Trust.</p>	<p>Deon Brand Adjacent Landowner</p> <p>Strandloper Investment Trust</p> <p>Email: 06-03-2018</p>	<p>It is noted that the I&AP is a landowner and business owner in Paternoster. It is noted that the farm 1050, which was purchased by the I&AP and which has a zoning of Resort II, does not form part of the project site. The Boulders Wind Farm project site is not in direct conflict with the zoning of the purchased land portion, and specifically the area with the highest potential for development of the wind farm (refer to Figure 7.19) is not in direct conflict with the land portion.</p> <p><i>General Concerns in respect of Paternoster:</i> The information regarding the status quo of the tourism sector in the Paternoster area is noted, and informs the current state of the socio-economic</p>

<p>Please note that I will also forward my concerns to the Saldanha Bay Municipality as well as the local Taxpayers Association.</p> <p>ANNEXURE A: INTEREST AND CONCERNS OF STRANDLOPER INVESTMENT TRUST</p> <p>1. The Interest of the Strandloper Investment Trust in the proposed project</p> <p>Strandloper Investment Trust (the "Trust") is the owner of the Remainder of Farm 1050 – see attached map in Annexure B for location and land relative to project.</p>		<p>environment for this area. The EIA for the Boulders Wind Farm must consider the current environment, which includes the currently operational West Coast One Wind Farm. As stated by the I&AP, the tourism sector in this area has been successful in 2017 and is still growing, with the Strandloper Ocean Boutique Hotel being considered as one of the top 25 Best Small Hotels in South Africa in 2017 and 2018. With construction commencing in 2013 on the West Coast One facility, a record of lessons learnt and trends and impacts on residents, tourists and tourism businesses provides a guide to the impacts and benefits which have been experienced in the Paternoster area, as well as the Peninsula as a whole. It is noted that the I&AP has indicated that the tourism sector has seen constant growth year on year. This growth in the sector is with the existing West Coast One Wind Energy Facility as part of the landscape, and it is noted that although tourists have indicated that the facility is noticeable, it has not deterred visitors to the area, or new business ventures from taking place within the area. In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for impact to property values, tourism and economic issues (which will focus on empirical data and tourism trends within the area considering the construction and operation of the West Coast One Wind Energy Facility). The information contained in this comment will be referred to the specialist for consideration.</p> <p>The development area as indicated in the report is the area investigated at the scoping level. The actual extent of the proposed Boulders Wind Farm will be ~ 55ha and will include up to 45 wind turbines. The West Coast One Wind Energy Facility includes 47 wind turbines, with a slightly lower turbine height. It must be considered that the entire project site (~5084ha) will not be used for the development of the Boulders Wind Farm, and that only ~1% of the larger project site will be altered through development (refer</p>
<p>The trust purchased the Remainder of Farm 1050 in order to build a resort on the land. The resort will have a strong focus on Wellness. As the main purpose of purchasing the land was the building of a resort, it was only purchased after the Saldanha Bay Municipality confirmed its zoning as Resort II. The land was therefore specifically purchased for its zoning which is in conflict with what is now being planned.</p> <p>2. General and Specific Concerns of the Strandloper Investment Trust</p> <p>2.1. General Concerns in respect of Paternoster</p> <p>(i) One of the unique selling points ("USP") of the West Coast as a tourism destination it is untouched, wild beauty;</p> <p>(ii) Despite these unique attributes, the West Coast traditionally struggled to successfully break into the tourism</p>		

<p>market. There are currently many indicators which show that there is a development with a much more positive prognosis. Paternoster is playing a key role in bringing about this change and is viewed by many as the jewel in the West Coast's tourism crown;</p> <p>(iii) Although I do not have the consolidated tourism numbers for the Paternoster, at our tourism facilities in Paternoster alone (Strandloper Ocean Boutique Hotel, the La Baleine Beach House Collection and the Cottage Collection) we sold approximately 15 000 guest nights to tourists during 2017 with a total value of more than R15.0m;</p> <p>(iv) How successful is Paternoster really as a tourism destination? Firstly it is still a very "young" and upcoming tourism destination and only took off in around 2000 after the road between Vredenburg and Paternoster was tarred. Capetonians were the first to discover the town and created a demand for weekend cottages. This was then followed by the development of Guest Houses (this is growing continuously and there are currently 19 Guest Houses in Paternoster listed on TripAdvisor). One of our properties, the Strandloper Ocean Boutique Hotel (see also its registration as a (I&AP) opened in 2012 and became the first hotel serving the international Five Star market. In 2014 (when it was still a Guest House) the Minister of Tourism awarded it not only as the best Five Star Guest House in the Western Cape but then also as the best of the whole of South Africa. After its conversion to a hotel, it had been in the Top 25 list of Best Small Hotels in South Africa in 2017 and 2018. It was also featured in many national and international travel and lifestyle magazines and publications; ITB (International Tourism Board Berlin) which is the foremost annual tourism fare in the world also chose the Strandloper Ocean Boutique Hotel in 2015 as one of the 50 top destinations worldwide;</p>		<p>to Section 1.2 of the Scoping report).</p> <p>The project will contribute to the socio-economic initiatives of the broader area. As the Boulders Wind Farm will be bid into the Department of Energy's (DOE) Renewable Energy Independent Power Producer Procurement (REIPPP) programme, a certain percentage of the revenue must be spent on economic development (ED) and socio-economic development (SED). The revenue must be spent to develop and grow the communities located within a 50km radius from the site.</p> <p>As part of the Boulders Wind Farm EIA process specialist studies have been undertaken in order to assess the impact of the Boulders Wind Farm on the ecology and fauna of the project site. During the Scoping phase an Ecological Scoping Study (Appendix D), a Freshwater Features Scoping Study (Appendix E) and an Avifauna Scoping Study (Appendix F) were undertaken to identify the potential impacts on the ecology and fauna of the area. These impacts will be assessed further and ground-truthed during the EIA phase.</p> <p>It is noted that there is a conservation programme for owls and bats in the area to compensate for loss as a result of the expansion of the town of Paternoster. The potential impacts of the wind farm on both birds and bats has been identified in the Scoping report, 12-month monitoring programmes have been undertaken in line with BirdLife South Africa's Best Practice Guidelines, and will be further assessed during the EIA phase.</p> <p><i>Specific Concerns in respect of the development of a resort:</i> The specific concerns in respect of the development of a new resort are noted. It has been requested for the I&AP to provide a copy of the application for Environmental Authorisation for the Resort Development to the Boulders EIA project team in order for the</p>
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<p>(v) Another indicator of a growing tourism sector, is the number of restaurants a town can sustain. Paternoster's success is evidenced by the fact that it has by far the largest number of restaurants of any town on the West Coast. On a recent visit to Plettenberg Bay, I also found that Paternoster has considerably more quality restaurants per capita than this long-established tourist destination.</p> <p>(vi) The density of gourmet experiences in Paternoster was even mentioned in a BBC travel documentary who were impressed by the small size and the quantity and quality of impressive culinary offers. The rising Chef of South Africa Kobus van der Merwe attracts foodies from all over the world;</p> <p>(vii) These indicators illustrate the success which Paternoster has achieved in a relatively short time. It also points to the remaining unlocked potential. Our experience at the Strandloper Ocean Boutique Hotel is a further testimonial to the success of Paternoster. Top-end tourists are choosing the hotel to return again and again, often choosing it above well-established locations like the Garden Route and even famous destinations worldwide. This underlines a clear trend in top-end tourism towards destinations like Paternoster which is always from the beaten track;</p> <p>(viii) Paternoster is therefore playing a key role in the development of tourism on the West Coast. By devaluing the jewel in the tourism crown of the West Coast, the impacts on tourism of the proposed project will not only be felt in Paternoster, but it opens the risk that the whole region could be devalued;</p> <p>(ix) This would risk many jobs for the local population. Tourism is an ideal industry to absorb relatively low schooled workers. We are witnessing this at our tourism businesses in Paternoster. These workers can be trained and</p>		<p>details of the resort application to be adequately considered by the wind farm EIA specialists. This request was sent via email on 13 April 2018 and is included in Appendix C. The property considered for the development of the resort by the I&AP is located to the west of the project site, with the affected property Uitkomst RE/6/23 being the closest to the area proposed for the resort. As per Chapter 7, Section 7.4 of the Scoping report a sensitivity analysis was undertaken in order to identify the area with the highest potential for development within the project site. Considering the location of the area proposed for the development of a resort in relation to the preferred development area within the project site, the minimum distance between the two areas will be 4.6km.</p>
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	<p>successfully employed providing opportunities which would otherwise not had been possible. By providing work to these families, the whole area is also uplifted as children are provided with a better future. This is already gaining more and more momentum, uplifting the whole area;</p> <p>(x) For teenagers and young adults the dynamic hospitality development in Paternoster is offering them finally a perspective to make a career in this field. The professional future of the local population is under enormous threat considering that fishing is facing a very uncertain future due to overfishing and environmental impacts;</p> <p>(xi) The current windfarm close to Paternoster will be enormously extended by the proposed project (see map provided by Savannah Environmental). Not only will the new footprint be nearly 4 times large, the new structures will also be much larger than the old ones, in excess of 120m high and are industrial giants compared to previous generation turbines.</p> <p>(xii) Numerous tourists staying with us, have already enquired about the existing windfarm raising their concern, even claiming to hear the noise. It is unfathomable to picture the impact of an enlarged windfarm and could mean the end to a bright future for Paternoster;</p> <p>(xiii) This raises the question as why to build a wind farm so close to Paternoster which is one of the catalysts for an evolving West Coast's tourism industry, whilst there is an abundance of desolate areas available with no tourism potential;</p> <p>(xiv) From an economic point of view our tourism projects will also make a much bigger difference to the local population. Firstly our planned projects have a relatively high capital value of between R1bn – R2bn and secondly most of the returns from our projects are recycled back into the community – salary and wages from our tourist businesses amount for example about 50% of expenses</p>		
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	<p>and a large percentage of other expenses are paid to suppliers of food, etc. This compared to the proposed wind farms where a very small percentage of returns will flow back to the local community, but will instead be paid to the large capital investors and financiers of the project;</p> <p>(xv) The proposed project will also result in a serious threat to the harmony of the local west Coast Eco system. I am not fit to comment on this and will appoint appropriate experts to comment more expertly on this, but it is very prominent that a large number of bird species are found here (this is also one of the attractions for today's tourists). These birds will be exposed to being killed by the rotating turbines. Given the area which the turbines will cover, the affect can be expected to be dramatic;</p> <p>(xvi) We also have a conservation program consisting of owls and bat hotels to attract and protect these birds. The owl project was started to control the field mice population as natural predators were reduced due to the development of Paternoster and also to give these endangered species a habitat. If these birds disappear or are being killed by the turbines, the eco system will be greatly disturbed. Magnetic fields resulting from the generation of electricity will also greatly disturb the bats we are trying to make part of the program.</p> <p>2.2. Specific Concerns in respect of the development of a resort</p> <p>The land was purchased in 2005 at an amount of R30.0m to build a resort. It was only purchased after its Resort II zoning was confirmed by the Saldanha Bay Municipality. This specific stretch of land was identified and purchased due to its uniqueness and being part of undisturbed nature.</p>		
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	<p>The land is ideally situated for the development of a resort inter alia for the following reasons:</p> <ul style="list-style-type: none"> (i) It has a beachfront of nearly 3km; (ii) It borders on Paternoster which is one of South Africa's leading emerging tourism destinations; (iii) Its other borders area onto undisturbed nature – this is one of the key USP's of the resort); (iv) It is situated next to the Strandloper Ocean Boutique Hotel and the resort can be easily integrated with the hotel's existing operations. <p>The successful experience at the Strandloper Ocean Boutique Hotel confirmed the demand for the resort. In addition to the concerns in 2.1 above, specific further threats to the development of a resort are as follows:</p> <ul style="list-style-type: none"> (i) An overpowering industrial facility right on the resort's doorstep – see map in Annexure B for the closeness of the proposed project to the resort; (ii) The Resort II zoning and an industrial facility right next to it, is in total conflict and the proposed project is violation of the rights which exist to develop a resort. (iii) The winning concept and most important USP's of the resort is the unique experience of space, sky and pure nature, this will be lost; (iv) The development of the proposed project will make the development of the resort unviable resulting in a large financial loss to the Strandloper Investment Trust. 		
13.	<p>The scoping report that has been made available for review and comment from 28 February 2018 to 03 April 2018 is not available at the Paternoster library. Where would it be available? Do people need to register with you as “an interested and</p>	<p>Ben Rootman Junxion Communications</p>	<p>The Scoping report was made available for a 30-day review period from 01 March 2018 – 03 April 2018. Notification regarding the availability was distributed to registered I&Aps on 28 February 2018. The Boulders Wind Farm Scoping report was couriered and</p>

	affected party"? If not with you, with whom?	Solutions Email: 07-03-2018	delivered to the Paternoster Library on 01 March 2018. The Scoping report was also made available at the St Helena and Vredenburg Public Libairies, as well as being available for download on the Savannah Environmental website (www.savannahSA.com) on 01 March 2018. All parties who have an interest in the Boulders Wind Farm need to register themselves as interested and affected parties (I&Aps). Registrations are required be made with Gabriele Stein of Savannah Environmental.
14.	I would like to request a password to view the scoping report for the Boulders Wind Farm. I don't know anything about this project yet, I saw it on your website by coincidence. I am from a Renewable Energy Independent Power Producer called Building Energy and I like to know about potential projects in the market that might become available for us to procure in the future. Can you please also add me to the I&AP database for this project?	Sharief Harris Development Manager Central & Sub Saharan Africa Building Energy (Pty) Ltd Email: 08-03-2018	The password to the EAP's website's download page was provided on 08 March 2018. Sharief Harris was registered as an I&AP on the project's database.
15.	Herewith some preliminary comment by the WCBR Focus Group Meeting with WCBR: 8 March 2018 1) Motivation, need and desirability: 5084ha of which 55 ha used for just 45 turbines. Only lease 55ha. Good thing have bigger area available. Green area 1050ha. Further refinement required before define the final area. Not develop in shaded area (mining rights, sensitive and visual). Developer to possibly consider giving off remainder of shaded area as a conservation area, including Kasteelberg Heritage site. May be a positive contribution / trade off for the development. Alternatives, location and technology. Not well motivated in	Muller Coetzee Specialist Director West Coast Biosphere Reserve (WCBR) Email: 08-03-2018	The preliminary comment/notes received from Muller Coetzee of the West Coast Biosphere Reserve (WCBR) have been considered in the final Scoping Report. It should be noted that these preliminary comments provide a summary of what was discussed at the Focus Group Meeting held with the WCBR on 08 March 2018 form their perspective. The notes for the record prepared by Savannah Enviromental provide accurate responses to the comments raised at the Focus Group Meeting held with the WCBR (refer to Appendix C).

	<p>SDF, already commented on. EIA to reflect on this.</p> <p>2) Not taking a position. Need to have necessary information to make an informed decision and have an adequate level of confidence that issues identified has been addressed.</p> <p>3) Can one re-apply for an EIA under a new name? 5th application</p> <p>4) Concern about location apparently not within areas proposed for wind farms. EIA regulations require that alternative locations and alternative technology options to be considered.</p> <p>5) Birds, 650 fatalities per annum at Hope Field, large proportion of raptors.</p> <p>6) Visual impact very important. Special effort required to clearly show impact. Computerised model perhaps.</p> <p>7) Impact on sense of place. WCBR has a vision to incorporate as a conservation area within Biosphere. Especially because of its unique heritage value.</p> <p>8) Noise contours – in format that is accessible to the lay person.</p> <p>9) Loss of agricultural land.</p> <p>10) Impact on Tourism, property values. Unique destination, with very special attributes.</p> <p>11) Labour – if from outside – social ills – job creation, initially-advance training to enable local people to take up job opportunities. Possibly utilise available local labour involved in alien clearing and trained. Developer obliged to use local labour, develop local enterprise, but no follow up by authorities that requires these commitments. Potential social impacts – labour brought in from outside can aggravate social ills.</p> <p>12) Flight paths Verlorenvlei, Rocher vlei and Berg River, Oyster Farm salt pans.</p>		
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	<p>13) Issue and responses table to be fed back to stakeholders in order to satisfy them that issues has been taken into account.</p> <p>14) Opportunity for developing a Beacon of sustainable development. Hybrid energy facility, pick up on the low energy (night time generating times), Solar, gas, DSM.</p> <p>15) First supply electricity to Paternoster, St Helena Bay etc, and feed remainder into grid. Eskom has monopoly. Speak to Municipality. German hybrid facility/self-sufficient. Contribute to green City</p> <p>16) Eskom has excess energy at present.</p> <p>17) Essential to look at broader socio-economic impacts and benefits if any.</p> <p>18) Is this facility already part of the REIPPP programme?</p> <p>19) Local Servicing team.</p> <p>20) Traffic Impact Assessment.</p> <p>Record of inputs during meeting with West Coast Biosphere Reserve (WCBR): Prepared by Muller Coetzee: Specialist Director. 8 March 2018 NOTE: Formal Letter to follow from Chairman of WCBR</p>		
16.	<p>Further to my request to Lisa at the meeting yesterday evening, please could you let me have the following:</p> <p>1) A complete set of the email address of all the people that attended the meetings in Britannica Heights and Paternoster yesterday as well as all registered interested and affected parties.</p> <p>2) An explanation as to why, as a registered interested and affected party, I have not as yet received a copy of the scoping report issued at the end of last month.</p>	<p>Peter Pickford Interested and Affected Party</p> <p>Groot Paternoster Nature Reserve</p> <p>Email: 09-03-2018</p>	<p>The request for the information by the I&AP is noted.</p> <p>1) The attendance registers of the Tourisms Paternoster focus group meeting held on 08 March 2018 was distributed to the I&AP on 13 March 2018. The full project database containing the contact details of all registered I&Aps cannot be provided. This is in line with the requirements of the Protection of Personal Information Act, No 4 of 2014 (POPI Act). A full listing of I&Aps is provided in the Scoping report as Appendix C1.</p> <p>2) A notice announcing the availability of the Scoping report was</p>

			distributed to all registered I&AP, including Mr. Pickford, on 28 February 2018. Proof of this distribution was submitted to Mr Pickford via email on 13 March 2018. All I&APs have access to download the Scoping report from the EAPs online portal for their convenience. In addition, the Scoping report was made available to all community members at the Paternoster, Vredeburg and St Helena Bay Public Libraries.
17.	<p>The meeting went well – emotional as to be expected. Your team was excellent!</p> <p>We are registering as an interested and affected party for the Long Beach Home Owners Association.</p>	<p>Ben Rootman Junxion Communications Solutions</p> <p>Email: 09-03-2018</p>	<p>The stakeholder comment is noted, and his attendance at the focus group meeting acknowledged and appreciated. The Long Beach Home Owners Association has been registered as an I&AP on the project database.</p>
18.	<p>1. Your unreferenced letter to this Branch dated 28 February 2018 refers.</p> <p>2. This application includes the following properties:</p> <ul style="list-style-type: none"> » Portions 2,3 and 5 from Boebzaks Kraal 20 » Portion 2 of Farm Vlei 46 » Portions 1 and 3 of Farm Schuitjies Klip 22 » Portions 7 and 9 from Davids Fontyn 18 » Portion 1 of Farm Het Schuytjie 21 » Remainder of portion 6 of Farm Uitkomst 23 <p>3. The proposal affects Divisional Roads 2160, 2664 and multiple Minor roads for which this Branch is the Road Authority.</p> <p>4. This Branch offers no objection to the issuing of the environmental authorisation on terms of the National Environmental Management Act.</p>	<p>ML Watters Chief Director: Road Management Network</p> <p>Western Cape Department Transport and Public Works</p> <p>Email: 09-03-2018</p>	<p>It is noted that the Divisional Roads 2160 and 2664, as well as minor roads are located within the area of the proposed development of the Boulders Wind Farm.</p> <p>It is noted that the Western Cape Department Transport and Public Works offers no objection to the issuing of the environmental authorisation in terms of the National Environmental Management Act.</p>

	5. This Branch will comment in detail upon receipt of the land use application in terms of the Land Use Planning Act 3 of 2014.		
19.	<p>This serves as a notice of receipt and confirms that your application has been captured in our electronic AgriLand tracking and management system. It is strongly recommended that you use the on-line AgriLand application facility in future.</p> <p>Detail of your application as captured: Type: Applicability Your reference number: N/a Property Description: Boulders Wind Farm Dated: 28 February 2018</p> <p>Please use the following reference number in all enquiries: AgriLand reference number: 2018_03_0052 Enquiries can be made to the above postal, fax or e-mail address.</p>	<p>K. Maluleke Land Use and Soil Management</p> <p>National Department of Agriculture and Environmental Affairs</p> <p>08-03-2018</p>	<p>It is noted that the National Department of Agriculture and Environmental Affairs has received the Boulders Wind Farm Scoping report and has captured the project as part of their electronic AgriLand tracking and management system.</p>
20.	<p>I was born on this farm Uitkoms Boerdery and lived here all my life and after my father I have started farming and have been farming here for the past 45 years.</p> <p>My observation is that Global Warming has definitely got an influence on my farming activities. I am thus forced to adapt my farming method for myself and my workers to survive. That is why I have decided to get involved in this Windfarm Development and am passionate about it for several reasons.</p> <p>The current farming circumstances has weakened so much due to Global Warming that is why I feel more motivated to go to alternative farming methods like Wind energy. The advantages it will have for myself and my workers is of great value. I will be able to improve my workers life circumstances if the Windfarm will be</p>	<p>Pierre Heydenrych</p> <p>Affected Landowner</p> <p>Email: 10-03-2018</p>	<p>It is noted that the I&AP is a resident of the Paternoster area. His interest in the project is also noted.</p> <p>It is noted that the affected landowner has experienced the effects of global warming on his farming activities and had to adapt his methods in order to sustain himself and his employees.</p> <p>It is noted that the affected landowner sees the development of a wind farm within his properties as an opportunity to undertake a different land use which will assist in enhancing his current farming activities through financial income. This development on his property will also assist with a reduced need for retrenchment of his employees due to the current financial constraints and challenges.</p> <p>The potential positive outcomes and benefits of the development</p>

	<p>running on my farm. If the current Global Warming trend will continue I will be forced to reduce my farm workers.</p> <p>The economic influence what this Windfarm will have to this community is very large. Not only the construction of the Windfarm but if the Windfarm is in operation as well.</p> <p>My land is neighbouring the town Paternoster and not only is climate change my only thread but also the following:</p> <ul style="list-style-type: none"> » The residents of Paternoster's strayed dogs that hunt down my sheep with great losses that have even reached our national news; » There is also livestock theft and the damage of my fencing etc is of very high costs. This is what makes it extremely difficult to continue to farm with sheep and cattle. That is why this is so important for me to have this Windfarm Development started at the soonest possible. <p>These points make it impossible for me to continue my normal farming activities on this land.</p> <p>This will at the end also contribute to South Africa's affordable energy supply and a will to our Coutry's economic situation.</p> <p>This will also be an advantage to the tourism in Paternoster, Guesthouses is the main source of income, as Windfarm structures are new to South African and people are curious about it.</p> <p>Last week the Minister of Energy, Mr Geoff Radebe confirmed that renewable energy will play a big role in the energy supply of South Arica and therefore it is important to get this project up and running as soon as possible.</p>		<p>of the Boulders Wind Farm, as stated by the I&AP, is noted.</p> <p>The challenges experienced on his properties are also noted, which include hunting of his livestock, theft and damage, as well as the constraints caused by the challenges (i.e. difficulty with continuing farming of sheep and cattle.</p>
21.	We live in Britannia Bay as pensioners. The sense of peace and	Piet & Magda	It is noted that the i&APs are residents of Britannia Bay, as well as a

<p>quiet, the natural beauty and atmosphere of the place, caused us to invest substantial funds in a home.</p> <p>We are also shareholders of a business in Paternoster on which we depend for a part of our future income and survival.</p> <p>We live here to escape modern urban environments and want unspoilt views and the sense of a village community, far removed from our previously stressful life in the city. The unknown and unforeseen impact this wind farm may potentially have on fauna and flora, peace and quiet, and beautiful vistas could destroy these very reasons to be here and consequently our quality of life.</p> <p>The above concerns reduce the value of our investment, and therefore our financial security in old age.</p> <p>It is also our view that your statement that a wind farm is a "...no consumptive use of a natural resource..." is both incorrect and misleading.</p> <p>Wind energy is consumed in the process of generation, with an as-yet not understood consequence on the environment.</p> <p>It is also incorrect to state that there is a need for new electrical energy in South Africa. President Ramaphosa stated quite clearly in Davos that we currently have an oversupply of electricity. With new units still coming online at both Medupi and Kusile and an economic growth rate in the (very) low teens, this situation is likely to exist for quite a long time into the future.</p> <p>Our business in Paternoster is heavily dependent on the town maintaining and enhancing its attraction as a sought-after tourism destination. In this regard the proposed wind farm will have a significant negative impact on our business, for reasons similar to those already mentioned above.</p>	<p>Steenkamp</p> <p>Britannia Bay residents and business owners in Paternoster</p> <p>Email: 12-03-2018</p>	<p>shareholder of a business venture based in Paternoster.</p> <p>The impact on property values and other socio-economic impacts as a result of the proposed project will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of property trends and values within the area.</p> <p>The statement which relates to "...no consumptive use of a natural resource..." is included as part of the benefits of renewable energy in Chapter 2 of the Scoping report. Wind as a natural resource provides the kinetic energy to rotate the blades of the turbines to generate electricity. There are no residual consequences on the environment as a result of the use of the kinetic energy.</p> <p>There is a need to diversify the energy mix of South Africa which is supported by the Integrated Resource Plan 2010 – 2030. The aim of the IRP is to ensure that electricity is generated from various fuel sources including coal, gas and renewable energy. Ministerial determinations have called for a procurement of 13 125MW of renewable energy from independent power producers (IPPs) of which 6 360 MW has been allocated to wind energy projects (Department of Energy, 2016). Therefore, it is considered that even though there might currently be a surplus of electricity within the country, the energy mix must be diversified in the future. This is especially relevant as the older Eskom power stations located on the Highveld are due to be decommissioned.</p> <p>Responses to the specific questions:</p> <ol style="list-style-type: none"> 1. The contracted capacity of the Boulders Wind Farm will be up to 140MW. The exact Wind Energy Converter (WEC) which will be used for this project has not been determined at the Scoping Phase. 2. High wind resources, which are considered to be an excellent
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	<p>Specific questions:</p> <ol style="list-style-type: none"> 1. What is the generator output versus wind speed profile? 2. What is the typical wind speed and direction (daily and annual) profile at this location? 3. What is the resultant average annual load factor for the planned installation? (including all planned and forced outages) 4. What is the energy conversion efficiency of the generating units at different wind speeds, and what is the annual average energy conversion efficiency? 5. What is the noise level versus distance profile of the facility? 6. What is the selling price (total cost to Eskom) of electricity from this facility as a percentage of the average electricity sales price (from Eskom) in the country? 7. How many permanent local, new jobs, will be created by this facility? (Please categorise as un-skilled, semi-skilled, skilled, professional and managerial) 		<p>resource for wind farm development, have been confirmed with certainty within the project site, with the mean annual wind speeds exceeding 8m/s at 120m above ground level. Only the annual wind speeds are considered when determining the resource potential of a wind energy facility. Currently, the wind assessment is still ongoing.</p> <ol style="list-style-type: none"> 3. The load factor, and other advanced technical analysis, for the facility is determined prior to the REIPPPP tender process, which is a technical requirement for bidding purposes. Currently the wind farm is in its environmental permitting process. 4. The exact Wind Energy Converter (WEC) which will be used for this project has not been determined at the Scoping Phase . 5. The determination of the noise levels associated with the Boulders Wind Farm can only be determined once the layout of the facility is available for review by the noise specialist. The Noise Impact Assessment to be undertaken in the EIA phase will assess the noise impact at the identified noise sensitive sites in terms of the latest relevant South African National Standards for "The measurement and rating of environmental noise with respect to land use, health, annoyance and to speech communication"; Noise Control Regulations; World Bank - Environmental Guidelines. Please refer to Chapter 8, Section 8.6 for a detailed description of the tasks to be undertaken by the noise specialist during the EIA phase. 6. The DoE's REI4P requires a price for selection as a preferred bidder. In addition, the economic development portion. The final price for any wind farm development is determined when bidding taking into account the economics at the time of the tender. The project is currently in the environmental permitting process. 7. During the construction phase ~350 employment opportunities will be created. During the operation phase ~50 employment opportunities will be created. The categorisation of the
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			employment opportunities will be made available during the EIA phase.
22.	Please list me as an I&AP?	Jan Vorster Interested and Affected Party Farm 33/5 Walters Email: 13-03-2018	Jan Voster of Portion 22 of the farm Walters 5 has been registered as an I&AP on the project database.
23.	Please can you confirm for me as to who Jonathan Visser is a representative of?	Peter Pickford Interested and Affected party Email: 15-03-2018	Mr. Jonathan Visser is a permitting representative of Vredenburg Windfarm (Pty) Ltd.
24.	Interest in the Project relates to the proposed windfarm in close proximity to Long Beach (Langstrand)	Ben Rootman Interested and Affected Party Long Beach Homeowners Association Email: 15-03-2018	The interest of the Long Beach Homeowners Association regarding the Boulders Wind Farm is noted.
25.	Thank you for your email and the requested information. I have indeed noted the addresses of IAPs from the scoping report. I note your comment that a notice was circulated on the 28th of February and I further note that as per the communications record of the scoping report, I was too included in your email of the 26/1/2018, however I have not received either of these email	Peter Pickford Interested and Affected party Email: 13-03-2018	The notice announcing the availability of the Scoping Report was distributed to all registered I&APs on 28 February 2018 (refer to Appendix C). Proof of notification to registered I&APs was sent to Peter Pickford on 13 March 2018. It was also confirmed in the meeting held on 08 March 2018 that several other recipients had received the notification. The Public Participation Consultant checked the server which distributed the bulk email on 28 February

	<p>notifications. I have checked all spam, junk and deleted mailboxes and there is no record of them. I would also most definitely remember receiving them. It seems therefore that there may be a malfunction in your server when you address a single email to numerous recipients. Please can I ask that you address this in the future by either sending less recipients per email or asking for confirmation of receipt of your communications, perhaps to all parties, but specifically from myself.</p>		<p>2018 and no reports of anomalies or returned mails were received.</p> <p>The Public Participation Consultant has considered additional mechanisms to be put in place when distributing notifications to recipients and that will request I&APs to acknowledge receipt of future notices related to this project.</p>
<p>26.</p>	<p>With reference to the recent meeting held with IA&Ps at Britannica Heights on 7 March 2018, I wish to submit further comments as follows:</p> <ol style="list-style-type: none"> 1) At the mentioned meeting I asked for a decent MAP of the whole affected area with street names and Britannica Heights clearly visible on this map in order for us to be able to see exactly where these planned turbines will be erected as on the present map provided to us with just green areas marked as the affected areas, means nothing to us as residents. We do not know the farm names and we cannot at all see exactly where we are situated on this map. 2) The best sites for wind farms are more remote areas i.e. the wide open space right next to the R399 towards Vredenburg on the left where the wind blows heaps of sand onto the R399 just about every day during our windy months which are only October - April every year. That area is flat and not situated in a valley like the proposed area for Boulders wind farm and it is situated adjacent to the R399 for much easier access while erecting and then for the upkeep of a wind farm and it is not close to a residential area, which is a green belt too. 3) People living close to wind farms (i.e. Denmark, UK, USA and various other countries) claim that the low level noise from the 	<p>Christa and Johan Botha</p> <p>Britannica Heights Residents</p> <p>Email: 16-03-2018</p>	<ol style="list-style-type: none"> 1) A map of the project site including the preferred development area is included in the Scoping report (refer to Figure 7.19). An additional map and Google Earth File (KMZ files) of the project site including the preferred development area and the road names of Britannica Heights, as well as other geographical indicators, has been prepared and provided to the attendees of the meeting. The KMZ file and map was distributed to the attendees on 16 April 2018. It is not possible to provide the locations of the wind turbines on the map at this stage of the EIA process as this detailed information will only be made available during the EIA phase once the facility layout has been designed by the developer. The scoping has informed the preferred development area for the facility. 2) As part of the project the developer has undertaken a site selection process in order to identify a project site that is both technically and environmentally suitable. The site selection process was undertaken in 2010 and a report regarding the findings of the site selection process has been included as part of Appendix O. Therefore, the site selection process has lead the developer to identify a feasible project site within the Saldanha area for the development of a wind farm. 3) The Noise Scoping Study (Appendix K) has recommended that a 500m buffer be placed around all homesteads within and

<p>turbines is causing stress-related illnesses. With THAT in mind, we would be surrounded by turbines (taking into account the turbines of West Coast One as well), the wind blows directly from the turbines towards us residing here on Britannica Heights, so we will definitely be affected by the low level noise.</p> <p>4) Turbines can cause disruption to TV, Radio and Cellphone signals - as it is we are already having problems with our Internet signals - have you taken this into account?</p> <p>5) Turbines cause disruption to migrating (and local) birds and bats and often lead to their deaths. We have Blue Cranes (South Africa's national bird) breeding on the farm right in front and adjacent to our properties on Britannica Heights. These birds are here all year around and we do NOT want them disturbed as we are very fortunate to have them right on our doorstep.</p> <p>6) The flashing white lights by day and red lights by night would be detrimental to our health. Even certain TV programs have warnings on the screen before certain programs that it contains flashing images.</p> <p>7) Then there is the problem with blade glint - Sunlight glinting on turbine blades for most of the day would be a health hazard as well, causing migraines and other health issues. As the sun rises over the bay behind us (Britannica Heights) and will be shining directly onto the blades ALL day long as it will be setting behind the proposed turbines AND these turbines are proposed to be 165m high and so will be right in our faces as we are situated 150m high on this hill.</p> <p>8) Our beautiful view will be totally spoilt by these structures which will have a huge effect on our property values. West Coast</p>		<p>surrounding the project site. No wind turbines may be placed within the 500m buffer areas, which are considered to be no-go areas. The 500m exclusion buffer recommended by the noise specialist is considered as acceptable for the mitigation of adverse noise impacts.</p> <p>4) Modern wind turbine blades are typically made of synthetic materials, such as resins, which have a minimal impact on the transmission of electromagnetic radiation.</p> <p>5) As part of the EIA process an Avifauna Scoping Study (Appendix F) and a Bat Scoping Study (Appendix G) was undertaken as part of the Scoping phase to identify the potential impacts of the Boulders Wind Farm on these species. The potential impacts of the wind farm on both birds and bats has been identified in the Scoping report (Appendix F and G), 12-month monitoring programmes have been undertaken in line with SABAA and BirdLife South Africa's Best Practice Guidelines, and will be further assessed during the EIA phase.</p> <p>6) It must be considered that the flashing red and white lights need to be implemented as part of the wind farm to be in line within the requirements of the South African Civil Aviation Authority. The impact of the lighting is considered in the Visual Impact Assessment.</p> <p>7) Blade glint involves the regular reflection of the sun off rotating turbine blades. Its occurrence depends on a combination of circumstances arising from the orientation of the nacelle, angle of the blade and the angle of the sun. The reflectiveness of the surface of the blades is also important. Blade glint is not generally a problem for modern wind turbines, because the standard blades coating is non-reflective.</p>
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	<p>One might not have had much of an impact on property values because it is not directly situated near a residential area, so in the scoping report for BOULDERS WIND FARM it can surely not be mentioned that the wind farm will have no effect on property values as it will. We purchased this property for the view it offered and to retire in peace and serenity, not knowing that these wind farms were going to be erected right in our view and so close to our homes. This is a very popular tourism area as well (Paternoster and St. Helena Bay) and the Boulders Wind Farm will have a huge impact on tourism, resulting in locals losing their jobs. We just cannot see how an area so beautiful and rich in nature, natural habitation and bird life can be a chosen site for such a large wind farm. We totally disagree with this.</p> <p>We need an "on site" inspection to be done with all the residents affected in order to see where exactly the proposed turbines will be placed as well. Only a map can be very confusing.</p> <p>We are not against renewable energy but as long as it is not in our sight and we are NOT affected nor our property values affected.</p>		<p>8) The impact on property values and on businesses within the area will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of property values and tourism trends within the area. It must be noted that the existing West Coast One Wind Energy Facility is located directly adjacent to the proposed project site for the Boulders Wind Farm.</p> <p>The request for an opportunity to understand the planned turbine locations through a site visit with the Britannica Heights residents is noted and will be considered during the EIA phase of the process.</p> <p>The support for renewable energy is noted, as well as the concerns regarding visual impact and impact on property values.</p>
27.	<p>Reference is made to the above-mentioned document dated 28 February 2018.</p> <p>This Department has perused the abovementioned documents for the establishment of a wind farm and has the following comments:</p> <ul style="list-style-type: none"> » The proposed development area is located within a 500m boundary radius from the edge of a wetland i.e. floodplain wetland, hillslope wetland and numerous channelled valley bottom wetlands. This triggers a water use in terms of section 21 (c) "implementing or diverting the flow of water in a watercourse and section 21(i) altering the bed, banks, course 	<p>N. Ndobeni Case Officer and M. Lintaar-Strauss Control Environmental Officer Department of Water and Sanitation</p>	<ul style="list-style-type: none"> » Where infrastructure associated with the Boulders Wind Farm triggers a water use in terms of Section 21 (c)(i) of the National Water Act, it is acknowledged that a water use authorisation for the project will be required from the Department of Water and Sanitation. The final facility layout will be considered against the water resources on the site. » It is noted that a pre-application meeting with the Department is required for the project in order for the Department to advise on the water use authorisation process. This will be undertaken prior to the preparation and submission of a WULA. » It is also noted that the Department only accepts electronic water use applications.

	<p>or characteristics of a watercourse of the National Water Act, 1998 (Act 36 of 1998). Please advise your client to apply for and obtain a water use Authorisation from this Department prior to commencing with any of the activities, as per Government Gazette No. 40229 in the Government Notice 509 dated 28 August 2016, with the completion of a Risk Matrix (Appendix A). The risk matrix can be found on the Department's website www.dws.gov.za under Document Library- Documents – "section 21 (c) and (i)" – click all scroll down to 'Final Risk Assessment Matrix'.</p> <ul style="list-style-type: none"> » You are hereby advised to arrange for a water use authorisation pre-application meeting with the Department to advise on the water use authorisation process. Please note that as from January 2018, this Department ONLY accepts electronic water use applications. » Water use applications can be submitted by following http://www.dwa.gov.za/projects.aspx and then click on e-wulaas. » No pollution of surface water or ground water resources may occur due to any activity on the property. » Measures to control illegal dumping of construction waste must be put in place as this may result in pollution to the surface water run-off. » No abstraction of surface or groundwater may be done without prior authorisation from this Department, unless it is a Schedule 1 Use or an Existing Lawful Use. » Storm-water runoff must be controlled to ensure that on-site activities do not culminate into off-site pollution. » All the requirements of the National Water Act, 1998 (Act 36 of 1998) in terms of water use and pollution control management must be adhered to at all times. 	<p>16-03-2018</p>	<ul style="list-style-type: none"> » Appropriate mitigation measures for the management of pollution and water resources within the project site will be included as part of the Environmental Management Programme to be made available for review during the EIA phase. » Appropriate mitigation and management measures for the management of construction waste during the construction phase will be included as part of the Environmental Management Programme to be made available for review during the EIA phase. » It is noted that no abstraction of surface or groundwater may be undertaken without the required authorisation by the Department. » Mitigation and management measures for the control of stormwater runoff will be included as part of the Environmental Management Programme to be made available for review during the EIA phase. » It is noted that the requirements of the National Water Act must be adhered to.
<p>28.</p>	<p>Please register the Cape Columbine Conservancy as an interested</p>	<p>Gustav Bester</p>	<p>Gustav Bester, Chairman of the Cape Columbine Conservancy</p>

	<p>group in regards with the proposed windfarms.</p> <p>Also send the password so that we can have access to the report of the proposed windfarm.</p>	<p>Chairman Cape Columbine Conservancy Email: 19-03-2018</p>	<p>was registered as an I&AP on the project database and provided the access password on 19 March 2018 to download the report, as requested (refer to Appendix C for the evidence of this consultation).</p>
29.	<p>Thank you very much for acknowledging receipt of initial comment that I submitted on the basis of a meeting with West Coast Biosphere Reserve. Please note that this is therefore not my personal comment but that of the West Coast Biosphere Reserve of which I am a Director.</p> <p>I do not know if closing date for comment has expired but subsequent to above meeting we also identified the potential impact on dolphins and whales that frequent the bay. These receptives are particularly sensitive to such noise and vibrations that may originate from a wind farm being located so close to Paternoster Bay. We would advise that specialist opinion be obtained in this regard.</p>	<p>Muller Coetzee Specialist Director West Coast Biosphere Reserve Email: 19-03-2018</p>	<p>It must be noted that the closest point of the preferred development area within the project site to the coastline is ~4km to the west. This distance is in line with the 4km buffer as recommended by the Department of Environmental Affairs and Development Planning guidelines.</p>
30.	<p>At the recent public meeting in Paternoster a week or two ago one of the young ladies was tasked with forwarding a list of the attendees of that particular get together - Based on the attendance list which was circulated Please advise if this list is still to be forwarded to me Thank you.</p>	<p>Michael Anderson Interested and Affected Party Email: 19-03-2018</p>	<p>The attendance register for the Focus Group Meeting held on 08 March 2018 with the representatives of Tourism Paternoster was sent to Michael Anderson on 19 March 2018 (refer to Appendix C for evidence of this submission).</p>
31.	<p>GENERAL</p> <p>One trusts more care will be given to the preparation of the EIA than to the checking of the spelling in the scoping report! "Subject tot he" "famring activities" "distrubance and desruction" idetnified" "archaeologicak "trainaing" "pperception" "infrastrucutre" "lvels" "includng" "oberserves" (A few from Pg v)</p>	<p>Anne and John Todd Britannica Heights Residents Email & Letter:</p>	<p><u>General</u></p> <p>The typing errors within the Executive Summary of the Scoping report have been rectified in the final Scoping report.</p> <p>The EIA process being undertaken for the Boulders Wind Farm is specific to the project site identified by the developer through the</p>

<p>This gives us much confidence in the future processes.</p> <p>What we notice from the scoping report is that with all the positive benefits given by all consultants none give any reason why these would not still be achieved if the WF was moved away from the residential/tourist area which would remove some of the negatives. For the meeting at Britannica Heights on 3 March 2018, Savannah recommended a maximum of ten residents attending. Was this noted in the minutes – if any – or will it be noted that the residents showed little interest as only ten attended?</p> <p>Having recently spoken to a project manager involved in wind turbine construction he advised that once an agreement had been reached between the land owner and developer for +/- R20 000 per turbine per month the project was a done deal and local residents are only consulted as it is in the EIA Regulations.</p> <p>It is strange that Vredenburg Windfarm (Pty) Ltd started the site selection process in 2010 and yet the previous application was by IPD Power (Pty) Ltd. And we registered with Aurecon as I&AP in February 2011.</p> <p>The figures given of saving 7 000 000 tons of CO2 gas (in an unstated time period) and supplying 84 000 SA households with clean renewable energy are very impressive, but we assume this is not only the case if the 45 turbines are established in the proposed Boulders Wind farm location - amid residential and tourist areas – but would also apply if the WEF was sited far from residential areas. This we assume also applies to the Western Cape 15% renewable energy target, the West Coast District Municipality planning policies and other benefits stated in 2.3.1.</p> <p>With respect to 2.3.3. Can Savannah please give us details of the socio-economic upliftment and the benefits the community has received through the social beneficiation scheme of West Coast One Energy Facility (WCOEF) to allow us to appreciate these benefits.</p>	<p>19-03-2018</p>	<p>undertaking of a site selection process. Therefore, other areas and positive and negative impacts to other areas for the development of the Boulders Wind Farm were not considered in this report.</p> <p>The meeting with the residents of Britannica Heights was a focus group meeting arranged with the directly adjacent landowners to the project site. All comments raised at this meeting have been recorded, distributed to attendees, and included in the report. No recommendation was made by Savannah Environmental that only 10 residents may attend. The meeting was a focus group meeting targeting the adjacent landowners of the project site and not a public meeting or forum.</p> <p>It must be noted that the Boulders Wind Farm is required to first obtain Environmental Authorisation and be awarded preferred bidder status by the Department of Energy under the REIPPP programme in order to construct the facility. The agreements between the developers and the affected landowners do not influence this process and the required licensing and permits is required to proceed.</p> <p>It is considered that the development of the Boulders Wind Farm would result in a saving of 7 000 000 tons of CO2 gas and supplying 84 000 South African households with clean renewable energy through the life of the project.</p> <p>As the developer has no direct affiliation to the West Coast One Wind Energy Facility and the associated socio-economic benefits to the community as a result of the project, no details can be reasonably provided. However, the West Coast One Wind Energy Facility recently received acknowledgement and awards for their upliftment strategies applied within the area from the Saldanha Bay Local Municipality. The following Aurora programs won an award:</p>
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<p><u>EMPLOYMENT</u></p> <p>Can Savannah please provide us with details of the positive impacts, i.e. how much increase in revenue will be created, and to whom - besides the land owners and Vredenburg Windfarm (Pty) Ltd. If a few local residents are employed, it will be for a period of +/- two years during which time they will raise their standard of living. However after this they will once more be returned to their previous standard.</p> <p>What benefits are associated with the Community Trust created by WCOEF, how many jobs were created, what employment, education and business opportunities, what skills development and training, were created and how many LOCAL people are currently employed by the WCOEF, is it 14 as stated in Appendix J.</p> <p>From reports wind power generation is one of the lowest and tourism one of the highest employment creators in the country. This project will have a negative effect on tourism.</p> <p><u>LOCATION</u></p> <p>Why is this site chosen when there are many areas away from the coastal residential and tourism areas? There are many hectares of unused land west of the Aurora sub-station away from residential areas and closer to the national grid. One assumes if there is suitable wind in this proposed area and at the Hopefield site, there will be suitable wind between the two, even outside the Langebaan Road AFB exclusion area. There appears to be sufficient space between the existing WCOEF and the R399 which is outside the Langebaan AFB exclusion area.</p> <p>All agree that renewable energy is a necessity, but when there is much unused land away from residential and tourist areas, why must the windfarms be sited close to these areas. There seems to be no overall planning for the establishment of these windfarms by government, but merely private individuals establishing them</p>		<ul style="list-style-type: none"> • ELRU NGO (2-year+ program aiming at improving Early Childhood Development in 19 creches of Vredenburg township) – for the category “Development of Skills of Marginalised People”. • Valued Citizens Initiative NGO (5-year program aiming at improving Life skills and Leadership for Principals/Teachers/Students and Parents in 16 primary and high schools of Saldanha Bay Municipality) – for the category “Education/Educator/Learner”. <p><u>Employment</u></p> <p>The positive impacts associated with the development of the project include the creation of employment and business opportunities, an increase in production and GDP-R due to capital expenditure, increased household income that will lead to the improved standard of living, the opportunity for skills development and on-site training and the upliftment of individuals (refer to Chapter 6, Section 6.4.7 of the Scoping report for more detail). In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for employment opportunities as well as increases in revenue (which will also consider trends associated with the construction and operation of the West Coast One Wind Energy Facility). The queries contained in this comment will be referred to the specialist for consideration. Due to the fact that the project still needs to receive Environmental Authorisation from the National Department of Environmental Affairs (DEA) and be granted preferred bidder status from the Department of Energy in order to construct the project the revenue cannot be determined with certainty at this time.</p> <p>Where local residents are employed by the Boulders Wind Farm,</p>
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<p>where ever they are easiest and cheapest to build with NO consideration to local residents. Why can these windfarms not be more concentrated in one area, and thus concentrate these unsightly structures in a rural area?</p> <p>We find your distances given to be "slightly" misleading, as they give the distances to the centre of the proposed project, whereas the boundary of the area proposed is 2km east of Paternoster, on the municipal boundary of St Helena Bay and 7km north of Vredenburg. Why are these distances that the proposed project will actually be from the towns named not given, so residents are aware of what they are "actually" in for? The small towns north of Vredenburg will not be 7km from the nearest turbine, so this is another misleading statement.</p> <p>These turbines will be in full view of the front yards of many residents of Britannica Heights. The highest point on Britannica heights is 153m ASL (from trig. Beacon # 16 Kaalrug) so even if the turbines are placed at SL, the tip height will be 12m higher . This will mean the south facing residents, lower than the highest point, will be looking into the spinning hub, the flashing lights and the shadow flicker every time they look out their front windows or enter their front yards.</p> <p>As seen with the WCOEF most of the turbines are sited on high ground even though the EIA recommended they not be.</p> <p>These windfarms are like a creeping cancer, one is built then another and another until the whole area between Saldanha, Vredenburg, Paternoster, St Helena Bay and Velddrift is one big windfarm. Every year or two another application arises and the harassment starts again trying to wear residents down. Already the consultants are saying "You will hardly notice them as they will be adjacent to the WCOEF, how can filling the whole valley from next to the existing to the boundary of Britannica Heights and 2km from Paternoster not be noticeable? Then when the next application arrives it will again be "You will hardly notice them" and so on till the whole area mentioned above is covered and the farmers no</p>		<p>skills training and transfer will be provided to them. Should the employment no longer be required the individuals involved would be able to use their new skills within other sectors to find employment which will assist with maintaining a certain standard of living.</p> <p><u>Location</u></p> <p>As part of the project the developer has undertaken a site selection process in order to identify a project site that is both technically and environmentally suitable. The site selection process was undertaken in 2010 and a report regarding the findings of the site selection process has been included as part of Appendix O. Therefore, the site selection process has lead the developer to identify a feasible project site within the Saldanha area for the development of a wind farm.</p> <p>The developer has indicated that they will consider the placement of turbines in such a manner so that the Boulders Wind Farm is viewed as an extension of the West Coast One Wind Energy Facility which will ensure that the wind turbines are concentrated in one area.</p> <p>The distances to the areas located within the surroundings of the project site are measured from the centre of the site in order to provide a measurement from the same location within the project site to all of these areas. This ensures that the distances provided are accurate in terms of the general location of the project site to the surrounding towns. The Scoping report states that the "project site is located approximately 7km east of Paternoster, 7km south-west of St Helena Bay and 14km north of Vredenburg (measured from the centre of the project site)". A disclaimer was added into the report (i.e. "measured from the centre of the project site") to disclose that the measurements are from the centre of the project site in order to provide clarity.</p>
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<p>longer need to farm, but live very comfortably on their WF earnings. No doubt it will again surface that residents have the NIMBY attitude – Not in my back yard – but in this case it is the NIMFY attitude – Not in my front yard. The landowners will obviously be supportive of the development and not view it as a conflict with the current land use practises as from the reported earnings they will receive from the project they will hardly need to carry on with current land use practises. Why is this figure a closely guarded secret? Do any of the members of Vredenburg Windfarm (Pty) Ltd or Savannah have turbines in their front yards?</p> <p><u>SOCIAL</u></p> <p>As seen from the maps provided by Aurecon for a previous application, these turbines will be visible for a radius of +/- fifty km. St Helena Bay (SHB) and Patemoster rely heavily on tourism and many tourists travel between the two and visit Britannica Heights for the view, from which they will get a magnificent view of the turbines. The dune road between Paternoster and Duyker Eiland is also a popular tourist route from which the turbines will be highly visible. We fail to see much relevance between a study conducted in Scotland on the effect of a WF on tourism and a WF in RSA.</p> <p>Crime is fairly low in the area at present, but with the influx of workers and job seekers this is likely to increase dramatically and security becomes a major problem. Will Vredenburg Windfarm (Pty) Ltd contribute to the extra security measures need by residents?</p> <p>As noted above the south facing residents will have all these turbines in their face permanently. Many are people who have worked many years and invested their savings in their dream retirement homes and B & B businesses, this project will not only affect their view, impact on their guest occupancy, but will also devalue their properties. Will Vredenburg Windfarm (Pty) Ltd</p>		<p>As part of the sensitivity analysis undertaken in the Scoping report the comments which relate to visual intrusion received from the Britannica Heights Residents were considered. This impact would not be mitigatable should the development proceed in that area. Due to the comments from the Britannica Heights residents and other environmental constraints and features located within the northern portion of the project site the southern portion was identified as having the highest potential for the development of the Boulders Wind Farm (refer to Section 7.19). The identification of the area with the highest potential for the development resulted in the southern section being identified as the preferred development area within which the development footprint (i.e. facility layout) will be located. The analysis therefore considered the visual impact on the Britannica Heights residents and has now avoided the area which would have created the most significant visual intrusion.</p> <p><u>Social</u></p> <p>The previous processes undertaken for the development of a wind farm within the project site cannot be considered as the project details have changed. Also, the approach to designing the facility layout of the Boulders Wind Farm is different to what was undertaken during any previous EIA process.</p> <p>Appropriate security measures and management will be applied during the construction and operation phases of the Boulders Wind Farm.</p> <p>The perception of the impact on tourism and property values has been identified within the Social Scoping Study (Appendix J). In order to further assess the impact on tourism and property values a Social Impact Assessment will be undertaken, in consideration with a Property Values, Tourism and Economic Issues Report (which will focus on empirical data and tourism and property value trends</p>
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<p>compensate them for their loss?</p> <p>We fail to see how the Gibbons 2014 study of "averaging over wind farms of all sizes" can be applied to all areas, surely there is a difference between the WF being sited in the middle of a desert and the middle of a city. Nor do we see how the limit of likely visibility is 14km when the previous study – which Tony Barbour Consulting quotes provided maps showing the area of visibility to be in the region of 50km, i.e. an area of +/- 4500 sq km.</p> <p>Once more it is stated that "there is no proof of wind farms posing a threat to human health" but not that there is no proof that they do not.</p> <p>A number of residents in the previous study indicated they did not regard the WF as having a negative visual impact, how many did regard it as having a negative impact and how many did not? No doubt those who did not, reside some distance away and do not look straight into a spinning hub every time they look out their front window.</p> <p>The No Development option gives all these negative lost opportunities, but would they be lost if the WF was not placed in the face of local residents?</p> <p>The Stompneus Bay – Vredenburg gravel road – which is mostly in poor condition – and the SHB main road are not designed for the extra volume of vehicles and extra heavy transport that will be using them during the construction phase, the roads and heavy traffic will be more dangerous for local users. Will Vredenburg Windfarm (Pty) Ltd be improving and maintaining these roads and providing safety vehicles and personnel to ensure safety on the roads?</p> <p><u>ENVIRONMENT</u></p> <p>Will Vredenburg Windfarm (Pty) Ltd be taking measures to control and avoid erosion from altered runoff routes and the wind over areas denuded of the natural fauna?</p>		<p>within the area considering the construction and operation of the West Coast One Wind Energy Facility). It must also be noted that comment on the thriving tourism industry in Paternoster has been received (see comment number 12) which provides an indication that the tourism industry is still strong after the construction and now operation of the West Coast One Wind Energy Facility.</p> <p>The Visual Scoping Study (Appendix L) undertaken now as part of the Boulders Wind Farm must be considered rather than the findings of the previous processes as these findings are no longer considered to be valid due to changes in the project description and details of the wind turbines. The Boulders Wind Farm Visual Scoping Study has indicated that due to the nature of a wind farm, the extent of the impact is expected to be local (with the highest probability of the impact being within 0km to 5km from the development footprint of the facility).</p> <p>The 'do-nothing' alternative, considered in Chapter 2, Section 2.4.6 of the Scoping report, considers both the opportunities that will be lost and the environmental impacts that will not occur should the 'do-nothing' alternative be implemented for the Boulders Wind Farm.</p> <p>A Traffic Impact Assessment (as included in the Plan of Study for the EIA in Chapter 8 of the Scoping report) will be undertaken as part of the EIA phase of the project which will consider the current road network within the area as well as assess the impact of the development on the traffic. The upgrading and maintenance of roads will be undertaken by the developer where required and personnel working on the project will be obligated to follow the roads rules within and surrounding the project site.</p> <p><u>Environment</u></p> <p>During the Scoping Phase, specialist input identified the drainage</p>
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<p>This area is on the flight path of birds between the Berg River Estuary and the Langebaan Lagoon IBA's. It is also an area where many endangered Blue Cranes gather, most years some breed in the area. Tourists and birders also visit Britannica Heights to view the "five larks" present – not the forty five wind turbines present. Are local knowledgeable bird residents, who have many years experience observing in the area – not just a few site visits ("The most relevant water bodies will be visited at least once in each season" i.e. four times) – to be consulted? The avifauna report states "during and post construction, monitoring will be very important to Improve the understanding of the real impact caused by the WEF on local bird populations" Will it not be a little too late to find out the WEF is having a major negative impact once the turbines are operational?</p> <p><u>HUMAN IMPACT</u></p> <p>The noise pollution will also be significant, even at 500m distant, the prevailing wind is from the south which will blow the noise towards Britannica Heights. Residents are used to the noise of strong winds which is not a constant. However turbines are a constant drone. In the previous EIA by Aurecon, their expert stated there was no proof of a health hazard from wind turbine noise, but he could not say there was no proof there was not a health hazard. The same was said about the visual impact of rotating turbine blades and shadow flicker. Unlike WCOEF where very few people are in range of the turbines, Boulders Wind Farm will be in range of many residents. Should health problems arise, will Vredenburg Windfarm (Pty) Ltd compensate any residents who suffer?</p> <p><u>COMMENTS FROM THE PREVIOUS SCOPING REPORT</u></p> <p><u>HEALTH</u></p> <p>1) "There is still no high level evidence of direct consequences for</p>	<p>lines and areas with a slope of more than 15% within the project site as no-go areas to the development due to the risk for erosion in these areas. Recommended erosion and runoff control measures to be implemented within the development footprint will also be included as part of the EMPr in the EIA report.</p> <p>An Avifauna Scoping Study (Appendix F of the Scoping report) has been undertaken and an Avifauna Impact Assessment will be undertaken in the EIA phase to assess the impact on birds within the project site and the surrounding areas.</p> <p>It is noted that there are residents with bird knowledge located within the area. These residents are encouraged to submit data relating to bird activity, diversity and abundance within the area so that they can be considered by the avifauna specialist. A focus group meeting was also held with the West Coast Bird Club on 08 March 2018 in Saldanha Bay, with Mr. Keith Harrison as the representative of the club.</p> <p>12-months pre-construction monitoring has already been completed for the Boulders Wind Farm which will be considered in the Avifauna Impact Assessment Report. The pre-construction monitoring provides data on which priority species may be affected by the Boulders Wind Farm. Also, where available, the post-construction monitoring data from the West Coast One Wind Energy Facility will be considered by the avifauna specialist in order to provide a better understanding of the impacts that can be expected at the Boulders Wind Farm.</p> <p><u>Human Impact</u></p> <p>Considering the fact that the closest point of the preferred development area is located more than 2km from Britannica Heights, the specialist has confirmed that the potential noise impact would be less at this distance from the development</p>
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<p>health from well-managed and appropriately sited wind farms and turbines, at least as far as causation of disease is concerned". - Is there any high level evidence of no direct consequence?</p> <p>2) "It is very unlikely that further research into whether appropriately sited and managed wind farms cause organic disease will reveal such evidence". - Is this everyone's opinion?</p> <p>3) "However, in terms of the WHO definition of health, the bio-psycho-social understanding of health and illness, and people's right to the highest attainable state of health, wind energy projects have profound implications for people who live close to wind farms in the short term, including annoyance and sleep disturbance". - Why can they not be sited well away from residential areas?</p> <p>4) "They also have profound, broader long-term implications for humanity and for the health of today's and future generations and the planet we live on. If we don't escalate clean renewable forms of energy including wind energy rapidly and massively, the risk of runaway climate change will overwhelm any other health concerns". - While most agree with this, the siting of them needs to consider the local communities affected!</p> <p>5) "Most of the immediate harmful health impacts of modern wind energy projects are mediated through subjective and psychosocial pathways. Among these, a key factor is perceived lack of control over environmental noise and other local developments such as the siting of wind farms. This leads to poor coping, frustration, feelings of hopelessness and adds to stress. These can be mitigated by full and meaningful participation in the development process, a sense of ownership, and economic benefit from the project". - Participation does not seem to be going to happen (See 6 below), what ownership and economic benefit?</p> <p>6) "This implies that developers and policy makers should engage</p>		<p>footprint. However, the noise specialist will consider the layout of the facility and the details of the wind turbines within the EIA Phase, and the modelled noise contours will be provided within the EIA report. While no health impacts are expected, health issues can be considered on a case by case basis.</p> <p><u>Comments from the previous Scoping report</u></p> <p>The comments submitted on a Scoping report prepared as part of a previous EIA process which the I&AP participated in are noted. However, due to the fact that the Boulders Wind Farm is being undertaken under a new application for Environmental Authorisation and the fact that there has been a change in the project details and process approach, these comments cannot be considered as part of this current EIA process and application for Environmental Authorisation, and responses to the previous set of comments are not provided here.</p>
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<p>seriously, honestly, openly and inclusively with affected communities from the outset, according to accepted institutionalized guidelines". - This does not seem to be going to happen as there is apparently a meeting for I & AP's on 28/10/14, which not many I & AP's seem to be aware of – we were certainly not advised.</p> <p>7) "Guidelines for noise levels should be close to the WHO guidelines for night time noise". Who will monitor this?</p> <p>8) On pg 19 of this report, he concludes that there would be less annoyance to the noise if those affected received benefits, e.g., electricity from the WEF, but this is not envisaged. All power generated will be fed into the grid.</p> <p>9) He also states that those affected by the noise or sleep disturbances will have a heightened sense of helplessness as there is no likelihood of the WEF being moved.</p> <p>One notices that Reynolds appears very pro WEF's no matter where they are sited, probably as long as they are not IHBY! He applauds all research claiming no effects from WEF's and belittles all stating possible health problems. Has enough long term research been done to prove or disprove either?</p> <p><u>NOISE</u></p> <p>As the potential noise impact associated with this WEF will only be investigated in more detail in the Environmental Impact Assessment phase when considering the layout as well as selected wind turbines, it is difficult to comment. It is noted though that "This assessment indicated that the proposed project could have a potential noise impact of high significance on the noise climate in the surrounding area as there are Noise-sensitive developments within the potential area of influence".</p> <p>The following comments are from those submitted to Aurecon during the previous study.</p> <p>Wind noise is a natural occurrence, and people on the west coast</p>		
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<p>expect it and enjoy it. It is not a constant noise as the wind gusts so the noise level changes and is sometimes non-existent. Wind turbine noise will however be a constant unchanging drone during wind activity. The above also applies to areas within sea noise range. Most people find the noise of wind and surf pleasing and peaceful; can the same be said of wind turbines?</p> <p>As the predominant wind is from the SE, Paternoster, St Helena Bay, Britannica Heights, Shelly Point, Stompneus Bay, DuykerEiland, etc being down wind, will be affected more by noise. In many areas (especially those nearest the proposed WEF) there is little "increased ambient sound levels due to normal daytime activities to mask the noises originating from the wind turbines" i.e. traffic noise etc.</p> <p>The construction phase which will generate the most noise will take up to four years to complete.</p> <p><u>VISUAL</u></p> <p>"The proposed WEF site appears to be compatible with the spatial development vision of the Saldanha Bay LM" – this vision needs to be included in the report, so all may be aware of the facts.</p> <p>As stated in the report "the intention is to manage urban development in such a way that no development would detract from the visual quality of the environment" – this development will surely not achieve this intention as from the summary in visual - "The proposed development will have a high to very high impact on the landscape causing fundamental change to the visual environment. The development has very high visual exposure, low visual absorption capacity, low compatibility, and is highly visible at greater distances. The development's visual impact has regional extent, long term duration, high intensity, definite probability, and high significance on the landscape."</p> <p>"Sites are no longer located near the town of Vredenburg and</p>		
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<p>various scenic/tourist routes except 6 Bester". - The route used by tourists between Paternoster and St Helena Bay will run through the middle of the WEF and the WEF will be visible from the popular Paternoster/Duyker Eiland dune road.</p> <p>"Most of the vegetation is classified as Endangered. Saldanha Granite Strandveld is ranked Endangered, Saldanha Flats Strandveld is Endangered and Saldanha Limestone Strandveld is Endangered, while Langebaan Dune Strandveld is Vulnerable". - the farmlands have already destroyed much of the endangered vegetation, this project could destroy more.</p> <p>"The modern high tech character of wind turbines while aesthetically pleasing themselves stands in strong contrast to the natural or rural landscape" - one wonders how many find wind turbines aesthetically pleasing</p> <p>From the map produced by Aurecon this WEF will be visible over an area of +/- 4500 Sq Km, your map shows an area of +/-200 Sq Km. The Hopefield WEF is visible from some areas in St Helena Bay.</p> <p>On pg 71 of the FSC "Key criteria which are of specific relevance to WEF" it states: Development on crest of mountain, hill or ridge is strongly discouraged. YET the turbines presently being erected along the R399 between Vredenburg and St Helena Bay seem to be right on the ridge line. What consideration is being taken of these recommendations and who monitors the construction companies?</p> <p><u>AVIFAUNA</u></p> <p>This site is not far off a direct line between the Berg River and Langebaan IBA's. Many of the birds described in the scoping report as vulnerable, endangered etc. are present in the area of the proposed site - the Blue Crane has been seen to breed here, in</p>		
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<p>the vicinity of S32.47.57, 5 E17.58.08, 5</p> <p><u>BATS</u></p> <p>It appears much work is needed to establish the number and species of bats in the proposed site. It is recommended that a 1 year study be done to obtain a thorough knowledge of the bats in the area. Will time be allocated for this?</p> <p><u>SOCIAL</u></p> <p>We find neither qualifications nor declaration of conflict of interest for Tony Barbour Environmental Consulting While one agrees with what T Barbour and S van der Merwe state about the white paper on Energy Policy, that "the strategic importance of promoting wind energy is supported by the national and provincial energy policies", the need for climate change response and to limit the use of fossil fuels.</p> <p>It is difficult to imagine why siting this WEF in close proximity to the unattractive Aurora SS would "effectively penalize this rural area, compromising its wilderness and touristic visual values" and not have the same effect on the residential and popular tourist area proposed.</p> <p>These principles should be taken into account: Excluding commercial WEF developments from areas with high aesthetic landscape value; Encouraging commercial WEF's in areas where they are well located in terms of visual impact, technical and safety criteria and landscape, environmental and planning criteria; Encouraging commercial WEF's in areas where visual disturbance to the landscape has already occurred (e.g. power transmission lines); Focusing on the development of large concentrated wind farms</p>		
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<p>rather than small dispersed locations where the distance between large wind farms is at least 30km, and ideally exceeding 50km.</p> <p>With reference to 4.2.2, all the points raised in the first part need to be seriously considered, with respect to the second part re the farmers, we foresee no problems as they are the ones who stand to benefit hugely from the project, from what one hears of how much they will gain financially, they will hardly need to continue farming except to maintain their lifestyle. They have already stated that the opposition to this project is "skokkend". If this whole process is going to be open and transparent, why is the figure by which farmers are going to benefit financially a closely guarded secret??</p> <p>"At this stage in the process there has been no interaction by the SIA Consultants with communities and other affected parties that live in the area". - This is obvious as not many in the area are aware that this project has once more been given the go ahead, after being put on hold, and very few were advised or knew of the recent meetings.</p> <p>They continuously mention "job creation", how many jobs for the "Local Community" will this WEF create both during construction and operation?</p> <p>What is IPD's Social Responsibility Programme? Should there not be a committee with a local representative</p> <p>We feel the following points need serious consideration:</p> <ol style="list-style-type: none">1) Residents in this area do not want a WEF farm which will be seen from the local towns and for many kilometres around.2) The visual impact, especially for the properties on Britannica Heights which will have the WEF in their front yards.3) The possible/certain drop in the value of properties especially on Britannica Heights.		
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	<p>4) The noise factor, especially downwind from the predominant SE winds i.e. St Helena Bay and surrounding suburbs.</p> <p>5) The proposed WEF is on the flight line for birds from the IBA's at Velddrift and Langebaan Lagoon. Not only will the WEF impact, but also the associated infrastructure – HV Lines, substations, roads, etc - will impact on flight lines and habitat.</p> <p>6) The tourism will be affected as the often used gravel road between St Helena Bay and Paternoster will lie between the turbines, and they will be visible from the popular dune tourist road between Paternoster and Duyker Eiland</p> <p>7) The gravel road used by many between St Helena Bay and Vredenburg will not take all the extra heavy vehicles – especially during construction - and will become dangerous from heavy traffic and surface condition. This road is already frequently in a bad condition with ruts and corrugations and is not graded as often as necessary. In the rainy season, certain sections of the road are extremely muddy as the road is lower than the surrounding ground level and has no drainage.</p> <p>8) While West Coast Biosphere Reserve, SANParks, West Coast DM, West Coast Way, AWOAHR and others are trying to promote tourism on the West Coast thus preserving and creating jobs, Vredenberg WEF's and others are trying to destroy tourism and will create minimal jobs.</p> <p>9) The crime and disease rate will probably/definitely increase, especially during the construction phase.</p> <p>10) The 1:10 00 orthophoto # 3217DB25 gives the highest point on Britannica heights as 164 m ASL this means that at 165m high, the turbines, even if placed at sea level, will be higher than this point.</p>		
32.	<p>I am writing with regard to the Scoping Report of the Boulders Wind Farm proposal, I would hereby like to be registered as an interested and affected party. Please may I also receive a password to access Scoping reports and EIAs connected with the proposed</p>	<p>Beverly Pickford Interested and Affected Party</p>	<p>Beverly Pickford of Groot Paternoster Nature Reserve has been registered as an I&AP on the project database. The password to the downloads access page was provided on 21 March 2018.</p>

	<p>wind farm. I thank you for your time and look forward to your urgent confirmation of my registration by e-mail.</p>	<p>Groot Paternoster Nature Reserve Email: 20-03-2018</p>	
33.	<p>In addition to the many well-considered objections and considerations (and there are many more) as set out by Alvin Roon in his E-mail of 21 March 2018, one should consider the undeniable fact that there is an overwhelming majority of Paternoster residents, property owners and other affected parties, all united in total opposition to the proposed Boulders Wind Farm development.</p> <p>Being thoroughly cognisant of this well voiced local community sentiment, the developers' continued endeavours to bring this proposed development to fruition can well be seen as a cynical attempt to regardlessly proceed in pursuit of a wholly self-serving objective.</p> <p>In my view, community approval in itself, should be considered as an essential deciding factor in the overall approval process of any such proposed development.</p>	<p>Tom Lubbe Managing Director Voyage Yachts Email: 21-03-2018</p>	<p>It must be noted that no email correspondence was received from Mr. Roon on 21 March 2018, however comments were submitted on 28 March 2018. The I&AP's objection against the Boulders Wind Farm is noted.</p> <p>The EIA process is a holistic process which considers both environmental and social impacts as part of the application for Environmental Authorisation. In addition, comments from all relevant stakeholders and interested and affected parties are required to be considered by the Competent Authority when evaluating an application for Environmental Authorisation. It must also be noted that support for the project has been raised by members of the community and that not all comments submitted by I&APs are objections towards the project.</p>
34.	<p>At St Helena Bay they have no jobs. The people of Sand Point have no jobs.</p> <p>At St Helena Bay we don't get jobs, we only heard that some people get the jobs, but they know that we suffer as well.</p>	<p>Amanda Songwevu Community Member – St Helena Bay Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of St Helena Bay. The I&AP's interest in/support for the project is noted.</p> <p>It is noted that there is a lack of jobs for the local community residing in St Helena Bay as well as surrounding communities and that new employment opportunities arising in the area would be welcomed.</p> <p>In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for employment opportunities. The information contained in this comment will be referred to the specialist for consideration.</p>
35.	<p>Historical and Heritage Conservation Body registered with Heritage</p>	<p>Charika Barends</p>	<p>It is noted that the I&AP is part of an Historical and Heritage</p>

	<p>Western Cape.</p> <p>Heritage Impact – Artefacts and historical value change towards the look of St Helena Bay</p> <p>What will happen to artefacts found outside of Kasteelberg (National Heritage site) as that area is of Historical value. Khoisan footprint since before Vasco da Gama landed in 1497.</p>	<p>Interested and Affected Party</p> <p>West Coast Aboriginal Council HM/CB/1015/10</p> <p>Reply Form: 22-03-2018</p>	<p>Conservation Body registered with Heritage Western Cape. The I&APs interest in the project is noted.</p> <p>As part of the Scoping phase an Integrated Heritage Scoping Study was undertaken to assess the impact of the Boulders Wind Farm on the archaeology, palaeontology and cultural landscape of the project site and the surrounding areas, which include the consideration of heritage artefacts and the historical value of the area. Refer to Appendix I of the Scoping report. Kasteelberg as well as a 2km buffer on the western side and a 1.5km buffer on the eastern side of the site are exclusion zones for development.</p> <p>Should heritage features be found during the development of the Boulders Wind Farm a Chance Find Procedure will be applied and an archaeologist will be contracted to follow the correct legislative procedure for the removal or protection of the find.</p>
<p>36.</p>	<p>I would like to learn more about the wind turbines and I need something to keep me busy.</p>	<p>Elvin Jaswill Don Community Member</p> <p>Steenberg's Cove</p> <p>Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of Steenberg's Cove. The I&AP's interest in the project is noted.</p> <p>The I&APs' interest in the operation of wind turbines is noted. More information on the turbines proposed for use at this facility can be sourced at https://www.enercon.de/en/home/</p>
<p>37.</p>	<p>We need jobs, it's hard to find jobs.</p> <p>It's hard for people that's not working.</p>	<p>Igshaai Daniels Community Member</p> <p>St Helena Bay</p> <p>Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of St Helena Bay. The I&AP's interest in/support for the project is noted.</p> <p>It is noted that there is a lack of jobs for the local community residing in St Helena Bay as well as surrounding communities and that new employment opportunities arising in the area would be welcomed.</p> <p>In order to further assess the potential for socio-economic impact,</p>

			a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for employment opportunities. The information contained in this comment will be referred to the specialist for consideration.
38.	<p>We are happy about this job opportunity. The community of Sandy Point is very happy about job promises. I agree with you.</p> <ol style="list-style-type: none"> 1. False job promises knowing that we are poor. 2. Creating better lives for other people 3. People ran away driven by views of the poor. We are asking for truth from you. 	<p>Mateka David Mmuso Community Member</p> <p>St Helena Bay</p> <p>Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of St Helena Bay. The I&AP's interest in/support for the project is noted.</p> <p>It is noted that the I&AP welcomes the potential for future job opportunities and in increase in the standard of living. It is noted that there is a lack of jobs for the local community residing in St Helena Bay as well as surrounding communities and that new employment opportunities arising in the area would be welcomed. It must however be noted that an EIA process is not a promise of job opportunities, but highlights the potential opportunities only, as the project still needs to receive Environmental Authorisation from the National Department of Environmental Affairs (DEA) and be granted preferred bidder status from the Department of Energy in order to construct the project. Only at this time would job opportunities materialise.</p>
39.	<p>It is very interesting to the people more especially if there is the security to guard and to keep the electricity safe and interesting to the tourism.</p> <p>It is dangerous. Most of us in Sandy point we are not working so since you are opening a project like this what would happen about us in company in Sandy point?</p>	<p>Nobubele Kindness Tatai Community Member</p> <p>Sandy Point</p> <p>Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of Sandy Point. The I&AP's interest in/support for the project is noted.</p> <p>It is noted that there is a lack of jobs for the local community residing in St Helena Bay as well as surrounding communities and that new employment opportunities arising in the area would be welcomed.</p> <p>In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for employment opportunities as well as impacts/benefits to tourism. The information contained in this comment will be referred to the specialist for consideration.</p>

40.	<p>This would create jobs for the people. This project will also help the community with electricity. Please go ahead with this.</p> <p>People will get jobs. Pay less for electricity. This will boost the economy of this area. Please let the project carry on.</p>	<p>Richard Gogwana Community Member Sandy Point Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of Sandy Point. The interest and support and benefits of the project is noted.</p> <p>It is noted that there is a lack of jobs for the local community residing in St Helena Bay as well as surrounding communities and that new employment opportunities arising in the area would be welcomed.</p> <p>In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for employment opportunities as well as socio-economic impacts/benefits. The information contained in this comment will be referred to the specialist for consideration.</p>
41.	<p>It will help more to the people who don't work because 65% of people don't work.</p> <p>Will there be more people help to work because more are not working in St Helena bay?</p> <p>Maybe when the project start will you not running from us?</p>	<p>Tomsani Ndire Community Member St Helena Bay Reply Form: 22-03-2018</p>	<p>It is noted that the I&AP is a resident of St Helena Bay. The I&AP's interest in/support for the project is noted.</p> <p>It is noted that there is a lack of jobs for the local community residing in St Helena Bay as well as surrounding communities and that new employment opportunities arising in the area would be welcomed.</p> <p>In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for employment opportunities. The information contained in this comment will be referred to the specialist for consideration.</p>
42.	<p>Attached please find my comments. I have not added any others, as my husband, John Todd, already sent you his comments and objections, to which I also agree and feel it is unnecessary to include them again with my comments.</p> <p>Scoping Report: Proposed Boulders Wind Farm</p>	<p>Anne Todd Interested and Affected Party Britannica Heights Resident</p>	<p>It is noted that the I&AP is a resident of Britannica Heights. The comment submitted by the I&AP does not consider the fact that the project site proposed for the Boulders Wind Farm is not technically and environmentally suitable for the development of solar technology. The information provided before the extract of the Scoping report, as included in the comment states that "Solar</p>

<p>Vredenburg. Herewith my comments. The Scoping Report on pg 31 states:</p> <p>2.4.3 Technology Alternatives states: "Also, solar energy developments are much more viable in the Northern Cape than Western Cape due to higher solar irradiance". However there is a solar energy farm at Paleisheuvel in the Piketberg area and another one on the R46 between Ceres and Touws River. We also hear than a solar energy farm is being planned near the R27 / Langebaan turn off (opposite the Engen Fuel Station). These are all in the W. Cape and the 1st mentioned and the latter are relatively close to the proposed Boulders Wind Farm, so that reasoning does not make sense.</p> <p>2.4.6. Do Nothing Alternatives 2.4.3 also states "solar energy technology would not be viable within the project site as well as the increased development impact it poses on agricultural farming land" i.e.: farming would be adversely affected by loss of land use. Then in paragraph 2 there is a contradiction "However, due to the current restrictions on natural resources such as availability and scarcity of water experienced within the area of the W Cape, the continuation of these activities are not considered to be sustainable from an environmental and economic perspective." So it appears that wind turbines are preferred because they will have less impact on agricultural land use in an area which is expected to become economically non viable from an agricultural perspective? Surely solar energy should be considered as: 1) it will have less negative impact on tourism</p>	<p>Email & Letter: 23-03-2018</p>	<p>energy technology would not be viable within the project site location due to the topography of the landscape as well as the increased development footprint impact it poses on agricultural land (i.e. total loss of an area located within the development footprint of a solar energy facility)". Even if there are other solar energy facilities located within the surrounding areas, the project site and the current land-use being undertaken on the project site lead to the use of solar energy technology not being viable.</p> <p>The extract taken from the Scoping report, i.e. "solar energy technology would not be viable within the project site as well as the increased development impact it poses on agricultural farming land" relates to the technology alterative and not the 'do-nothing alternative'. The section referring to a loss of agricultural land in Section 2.4.3 (i.e. technology alternatives) relates to the Department of Agriculture, Forestry and Fisheries' (DAFF) guideline of 2011 which does not support extensive loss of agricultural land through the development of renewable energy within cultivated areas. Development of a solar energy facility within agricultural areas results in total loss, which is not the case with a wind farm, and therefore the development of a solar energy facility is not considered to be viable from technology perspective.</p> <p>Where the comment refers to there being a contradiction in the information it is due to the fact that the extract was taken from a different heading and subject as the extract included in the paragraph above. The extract "However, due to the current restrictions on natural resources such as availability and scarcity of water experienced within the area of the W Cape, the continuation of these activities are not considered to be sustainable from an environmental and economic perspective." is included under Section 2.4.6 – the 'do nothing' alternative.</p> <p>From a technological perspective wind turbines are preferred due</p>
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	<p>2) the residents of Britannica Heights overlooking the proposed Boulders Wind Farm, will not have rotating turbine blades in their faces day and night?</p> <p>3) Many other residents of Britannica Heights have responded with their objects, so I will not repeat them all here.</p>		<p>to the wind resource in the area. The implementation of solar energy technology is not considered to be a viable alternative due to the topography of the area and the fact that large sections of agricultural land will be lost. Chapter 2, Section 2 (g)(x) of the EIA Regulations, 2014, (as amended) states that if no alternatives are investigated then a motivation needs to be provided for not considering such. The motivation for not considering solar energy facility within the project site is therefore included in Section 2.4.3 of the Scoping report.</p> <p>In terms of the statement relating to the land use in the area becoming economically non-viable from an agricultural perspective, this has been taken out of context. The section relating to this statement states that should the 'do nothing' alternative be implemented the current land-use of the project site will continue which relates to agricultural activities. However, due to the current restrictions on natural resources, such as the availability and security of water, experienced within the area and the Western Cape Province the continuation of these activities are not considered to be sustainable from an environmental and economic perspective. Therefore, with the implementation of the 'do-nothing' alternative the opportunity will be lost to enable a long-term sustainable land-use for the affected properties and secure economic income and socio-economic development for a period of 20-25 years.</p>
43.	<p>We operate a business in Paternoster. The sense of peace, calm and tranquillity as well as natural beauty was the reason we made a substantial investment in Paternoster.</p> <p>1) The negative visual effect, without a doubt, will result in a decline of tourism.</p> <p>2) Serious concern about the noise effect it will have as well as visual with flashing lights.</p>	<p>Garth Alamazon Interested and Affected Party</p> <p>Louberry (Pty) Ltd</p> <p>Reply Form: 23-03-2018</p>	<p>It is noted that the I&AP is a resident and business owner in Paternoster.</p> <p>1) A Visual Scoping Study (Appendix L of the Scoping report) undertaken as part of the Scoping phase and a Visual Impact Assessment (EIA phase) will be undertaken to assess the visual impact of the Boulders Wind Farm on the surrounding environment. In order to assess the impact on tourism, a Social Impact Assessment will be undertaken, in consideration with a</p>

	<p>3) The effect it will have on the birds and bats in the area. 4) The negative effect on our investment and property prices as tourism will decrease.</p>		<p>Property Values, Tourism and Economic Issues Report (which will focus on empirical data and tourism trends within the area considering the construction and operation of the West Coast One Wind Energy Facility). With construction commencing in 2013 on the West Coast One facility, a record of lessons learnt and trends and impacts on residents, tourists and tourism businesses provides a guide to the impacts and benefits which have been experienced in the Paternoster area, as well as the Peninsula as a whole.</p> <p>2) Potential noise impacts have been identified in the Scoping report as part of the Noise Scoping Study (Appendix K). A Noise Impact Assessment will be undertaken as part of the EIA phase to assess and ground-truth the potential noise impacts to the surrounding environment.</p> <p>3) The potential impacts of the wind farm on both birds and bats has been identified in the Scoping report (an Avifauna Scoping Study (Appendix F) and a Bat Scoping Study (Appendix G) was undertaken as part of the Scoping phase). 12-month monitoring programmes have been undertaken in line with SABAA and BirdLife South Africa's Best Practice Guidelines, and will be further assessed during the EIA phase.</p> <p>In order to assess the impact on property values a Social Impact Assessment will be undertaken, in consideration with a Property Values, Tourism and Economic Issues Report (which will focus on empirical data and property value trends within the area considering the construction and operation of the West Coast One Wind Energy Facility).</p>
44.	<p>Please find comments from an I&AP on the DSR for the Boulders wind energy facility. Would you please acknowledge receipt of e-mail to Mr Pickford? His details are in the attached correspondence.</p>	<p>Adri La Meyer Environmental Officer</p> <p>Western Cape Department of</p>	<p>The comment from Mr. Pickford was received directly from him on 26 March 2018. His comments have been included as comment number 46 of this comments and responses report. A response to his comment has also been provided.</p>

		<p>Environmental Affairs and Development Planning</p> <p>Email: 26-03-2018</p>	
<p>45.</p>	<p>I, hereby, wish to object to the proposal of a wind farm on one of the most beautiful peninsulas on the West Coast of South Africa. The unobstructed views, natural beauty, rural atmosphere and unique fauna and flora are treasured by the residents of the area, it is the very reason, if not born here, most purchased their property and invested in the area.</p> <p>1) OBSTRUCTION OF VIEW AND NATURAL BEAUTY There is already one wind farm in the area, West Coast 1, which was erected whilst residents were still gathering their thoughts, had no idea how to proceed with objections, and could not envisage how it would irrevocably change the special nature of their landscape. These same residents, objected to the second proposal for the Vredenburg Wind Farm in 2016, and are now faced with a third wind farm proposal, the Boulders Wind Farm, much closer to their homes and village than West Coast 1, and right through the middle of their view. This is not an industrial or commercial area; Paternoster, Brittanica Heights, Stompneus Bay, Brittanica Bay and Shelley Point are quiet, rural villages where residents, weekenders and tourists find refuge from development and busy landscapes. The proposed wind farm site lies within the Cape Biosphere Reserve, inspired by the conservation of nature. The proposed wind farm site borders on the Cape Columbine Conservancy, which embodies a philosophy of conserving nature and runs from the Groot Paternoster Nature Reserve, through private farms, conserved land and parts of the village of Paternoster to Trekoskraal. The Groot Paternoster Nature Reserve is a haven for</p>	<p>Beverly Pickford Interested and Affected Party</p> <p>Groot Paternoster Nature Reserve</p> <p>Letter: 26-03-2018</p>	<p>It is noted that the I&AP is a resident of Groot Paternoster Nature Reserve. The objection to the Boulders Wind Farm is noted.</p> <p>1) The project site as indicated in the maps within the report is the area investigated at the scoping level. The actual extent of the proposed Boulders Wind Farm will be ~ 55ha and will include up to 45 wind turbines. It must be considered that the entire project site (~5084ha) will not be used for the development of the Boulders Wind Farm, and that only ~1% of the larger project site will be altered through development (refer to Section 1.2 of the Scoping report). In addition, the area with the greatest potential for development has been identified through this Scoping phase (refer to Section 7.4 and Figure 7.19 of the Scoping report). Consultation with the Cape West Coast Biosphere Reserve, the Cape Columbine Conservancy and the Groot Paternoster Nature Reserve has been undertaken with the relevant representatives. The presence of the Biosphere Reserve has also been considered by the Ecology Scoping Study (Appendix D) as the project site is located within the reserve area, and it was confirmed that there are no core areas associated with the reserve. The feedback from the Cape West Coast Biosphere Reserve indicated that besides the conservation and protection of the environment, their interest also includes the people of the Biosphere, and this would include opportunities for upliftment of society. An Avifauna Scoping Study (Appendix F of the Scoping report) was undertaken during the Scoping phase and</p>

<p>thousands of seabirds and hundreds of inland birds and other fauna, sustaining a healthy ecosystem. Paternoster is a vernacular village of historical significance and many people survive on the tourism which this creates. The koppies, which occur on the proposed wind farm site, are of historical and archaeological significance, as they were inhabited by the Koisian. These koppies, lying in the heart of the surrounding farmlands, apart from their visual appeal, also provide microcosms of life and havens for roosting and nesting birds and other fauna.</p> <p>2) FAUNA AND FLORA</p> <p>The Bird Scoping Report is flawed and incomplete, as it does not take into account the critical significance of the fact that the proposed wind farm would be situated on a peninsula that is a major flyway for thousands of sea and inland birds, flying between Langebaan Lagoon, the bird vlei at the Paternoster Oyster Farm, the Groot Paternoster Islands and Velddrif and the Berg River Estuary. It, also, does not take into consideration that the proposed wind farm site, lies within a significant far greater eco-system of prolific birdlife, and thus other dependent and co-dependent species. During the winter storms and when the fog closes in, the birds are forced to fly further and further inland, and use the peninsula as a flyway.</p> <p>Two photographs are included here, taken Sunday, March 11,</p>		<p>an Avifauna Impact Assessment will be undertaken during the EIA phase to assess the impact on birds within the project site and the surrounding areas. A Social Impact Assessment will be undertaken, in consideration with a Property Values, Tourism and Economic Issues Report which will focus on empirical data and tourism trends within the area considering the construction and operation of the West Coast One Wind Energy Facility. Kasteelberg has been identified by the heritage specialist as a heritage feature of interest, however Kasteelberg is located outside of the project site and will not be directly affected. An Integrated Heritage Scoping Study (Appendix I) has been undertaken during the Scoping phase to identify the potential impacts of the Boulders Wind Farm on the archaeology, palaeontology and cultural landscape (i.e. visual impact on the cultural features within the area).</p> <p>2) The Avifauna Scoping Study has been undertaken in terms of the Best Practise Guidelines compiled by BirdLife South Africa. The Avifauna Scoping Study was also undertaken in accordance with the requirements of specialist studies as per the EIA Regulations, 2014 (as amended). The bird specialist has considered the environment that will be affected by the development of the Boulders Wind Farm and will assess this further as part of the Avifaunal Impact Assessment to be undertaken during the EIA phase. The diversity and abundance of priority bird species (including sea birds and raptors), as well as their movement across the site and surrounding area will be considered as part of the Avifauna Impact Assessment through the consideration of the pre-construction monitoring which has been completed for the Boulders Wind Farm. In addition, data from a radar assessment as well as on-going monitoring from the West Coast One wind Energy Facility will be considered, where available. Where other data is available, this will be required to be considered by the bird specialist in the EIA phase to assess the significance</p>
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<p>2018.</p> <p>The first shows a portion of thousands of Cape cormorants bathing and resting on the shores of the Groot Paternoster Nature Reserve,</p> <p>adjacent to the wind farm site. Also present are crowned cormorants, bank cormorants, whitebreasted cormorants, Arctic terns, common terns, swift terns, Caspian terns, Cape gannets, Sabine's gulls, kelp gulls, Hartlaub's gulls, a southern giant petrel, African black oystercatchers, turnstones, whimbrels, sanderlings and white fronted plovers. Cape cormorants are gregarious and need colonies to survive, and they and the bank cormorants are classified as Endangered, and Caspian terns as Vulnerable. When walking in the Reserve or driving the dirt road to Paternoster, through the proposed wind farm site, we often see gulls, terns and cormorants, way inland when the weather is bad. Virtually all the sea birds mentioned here also breed in the area, which adds to the danger of possibly devastating their numbers when one has no idea of the long-term impact of the proposed wind farm. The beaches in the area, particularly in the Groot Paternoster Reserve, are significant resting places for Arctic terns, migrating north from Antarctica as winter arrives around March/ April and again as they return for the summer in September/ October.</p> <p>The second photograph shows a scene along the dirt road to Paternoster. On Sunday, March 11, 2018, travelling to Paternoster from the junction on the dirt road to Vredenburg, driving through Schuitjes Klip and Uitkomst, we counted 2 lanner falcons, 2 jackal buzzards, 38 blue cranes, 54 sacred and hadeda ibises, 8 pairs of Egyptian geese, 8 spurwing geese, 10 shellduck and a constant stream of small flocks of gulls and terns flying overhead. This is the dry season, there are many more birds when the rain comes and</p>		<p>of the impact to local bird populations.</p>
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<p>the vleis and seeps fill with water, which brings many other species: yellowbilled ducks and Cape and redbilled teals, to name a few. The blue crane is Near Threatened on the IUCN Redlist, and we have populations of black harriers, an Endangered species, and the lanner falcon is listed as Vulnerable. The black harriers are migrant and return every year to this area, so, as with all migrant species, one cannot say how the loss of this local population would affect the species as a whole. In the Groot Paternoster Reserve and surrounding area, we also have healthy populations of jackal buzzards, rock kestrels, barn and spotted eagle owls, black headed herons, secretary birds, crowned plovers, spotted thick-knees, pied crows, Cape and greywing francolin, helmeted guineafowl, common quail, blackshouldered kites and at certain times of the year African marsh harriers, steppe buzzards, European nightjars, pale chanting goshawks, gymnogenes, the occasional martial eagle and then the myriad of larks and smaller bird species. European bee-eaters and various swifts and swallows are three of the migrant species of smaller birds that we have noted. Bird movement across the area is seasonal and in response to food, and the greater and lesser flamingos, great white pelicans and Cape cormorants fly in flocks over the area, so turbine blades that can move in excess of 250km/hr at their outer tips could have detrimental effects on these birds.</p> <p>My deepest concern, is that knowing this is a bird flyway and birdlife is thriving in this area, that any changes to an ecosystem could cause its collapse, how could one possibly risk the construction of a wind farm, which has proved to kill birds, particularly raptors and migrants that fly at night, and have a devastating effect on bats, when we have no way to prove the opposite. How many bird and bat fatalities is this wind farm worth? We all know that wildlife habitat is diminishing at a rapid rate in the face of development in our country, so here we have an area, with villages and a farming community, yet includes some margin</p>		
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	<p>for the wildlife. This is a critical bird flyway, we cannot put any further pressure on the wildlife of this area. We support green energy, but it should not be at the cost of our wildlife and the other species which share our planet. The government should provide a mapping service for wind farms which indicates areas of least environmental impact; this is definitely not one. Let us not make the mistakes that other countries have made, before it is too late.</p> <p>Rather, find a site for the wind farm which is not a haven of bird and other wildlife, and of significant natural beauty that is precious to its residents, and rather not run the risk of irrevocably destroying this beautiful environment.</p>		
46.	<p>Your scoping report for the proposed Boulders Wind Farm dated March 2018 and referring specifically to the properties; Boebezaks Kraal Portion 2 of Farm 40, Boebezaks Kraal Portion 3 of Farm 40, Boebezaks Kraal Portion 5 of Farm 40, Schuitjes Klip Portion 1 of Farm 22, Schuitjes Klip Portion 3 of Farm 22, Uitkomst Portion 6 of the Remainder of Farm 23, Davids Fontyn Portion 7 of Farm 18, Davids Fontyn Portion 9 of Farm 18, Het Schuytje Portion 1 of Farm 21, Fransvlei Portion 2 of Farm 46 Refers.</p> <p><u>Comments in response to the proposed Boulders Wind Farm Scoping Report of March 2018.</u></p> <p>The correspondent wishes to state that he is a professional wildlife photographer and author. He has published 9 books with a further two scheduled for release this year. He has 40 years of experience in the fields of wilderness and wildlife conservation.</p> <p>The correspondent further wishes to state that he is a keen</p>	<p>Peter Pickford Interested and Affected Party</p> <p>Groot Paternoster Nature Reserve</p> <p>Letter: 26-03-2018</p>	<p>It is noted that the I&AP is a resident of Groot Paternoster Nature Reserve. The expertise and credentials of the I&AP are noted, as well as the support for sustainable renewable energy.</p> <p><u>General:</u></p> <p>The project details and approach to undertaking the EIA process for the Boulders Wind farm project differs from the information that was included in the EIA process and Scoping report undertaken by the Terramanzi Group. This is a new Application for Authorisation, and while comments and sentiments from the Terramanzi process can be considered by stakeholders, the Applicant and EAP, comments pertaining to the current application are the comments which are included in this EIA Process and will have bearing on the decision by the Competent Authority. All comments regarding the current application have been collated and are under consideration, and the EIA process is not procedurally flawed.</p> <p>The aim of the public participation process as part of the EIA process is to provide a transparent platform which provides all I&APs with the opportunity to raise comment regarding a project. This platform is made available for both parties who support and</p>

<p>advocate of clean and renewable energy, but of the express opinion that the implementation of any energy facility should not be undertaken at the expense of the environment; in all that the term environment encompasses, from fauna and flora to geographical, historical and social. This is particularly pertinent in the circumstances such as those presently in South Africa, where the government and Eskom have initiated a fast track drive to introduce sources of clean energy into the country's energy supply systems. Fast track should not countenance irresponsible or rash development.</p> <p style="text-align: center;"><u>General:</u></p> <p>I wish to record, that this is the second time the public has been called upon to furnish comments on a proposed wind energy facility on the said properties and that the scoping report of Terramanzi Group PTY Ltd / Sustainable Futures ZA, Project Reference Number: 150302 responded to by the public in May 2016, is of direct relevance to this proposal. As such the record of comments gathered by the Terramanzi Group, which form part of the public record, should be considered as part of this scoping report. To not do so, would be a failure to comply with the good faith placed in you, in your capacity as the public participation consultant for the proposed Boulders Wind Farm, and render your subsequent report fatally flawed.</p> <p>I also wish to make record of the fact that my own comments to the Terramanzi Scoping report, as above, were delivered to Terramanzi on the 10th of May 2016 and should be considered as an annexure to this response to your call for public comment on the Boulders Wind Farm Scoping Report.</p> <p>This, then brings me to the point where I must question the validity of the assumption: that it should remain incumbent on the public to continue to defend their right to enjoy their property under the</p>		<p>object against the development.</p> <p>The submission of previous applications for environmental authorisation for a similar activity on similar farm portions which have lapsed does not preclude this Applicant or any other from making a similar Application for Environmental Authorisation. Each application will be considered on its own merit by the Competent Authority.</p> <p>It must be noted that the meeting held with Tourism Paternoster at the Lodge in Paternoster on 08 March 2018, was not a public meeting but rather a focus group meeting focused on consulting with the tourism representatives within the greater Paternoster area. It must be noted that Vredenburg Windfarm (Pty) Ltd is the special purpose vehicle (SPV) under which the Boulders Wind Farm will be developed and while the name remains the same, the shareholding of Vredenburg Windfarm (Pty) Ltd has changed. The details of the shareholding was shared in the focus group meeting by the representatives of the Applicant in attendance.</p> <p>The development area as indicated in the maps within the report is the area investigated at the scoping level. The actual extent of the proposed Boulders Wind Farm will be ~ 55ha and will include up to 45 wind turbines. It must be considered that the entire project site (~5084ha) will not be used for the development of the Boulders Wind Farm, and that only ~1% of the larger project site will be altered through development (refer to Section 1.2 of the Scoping report). In addition, the area with the greatest potential for development has been identified through this Scoping phase (refer to Section 7.4 and Figure 7.19 of the Scoping report). This approach has allowed for the areas which are considered to be constrained to be avoided by the planned development, and has indicated that the most preferred area for development is alongside the existing and operational West Coast One wind farm.</p>
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<p>conditions and circumstance under which they purchased, improved and currently enjoy them and not the reciprocal situation where it becomes incumbent on the developer to prove to the satisfaction of the relevant government bodies, namely the Department of Minerals and Energy and the Department of Environmental Affairs, that they are able to satisfy all the points of concern previously raised by the public with regard to the development of a specific type of facility on a set group of properties, before being allowed to initiate a public participation process.</p> <p>This, to my understanding, is the common standpoint of the law and to demand that residents of the areas potentially affected by the proposed wind energy facilities continually defend their right to live peacefully and undisturbed is unreasonable, unjust and an infringement of our right to peaceful existence. To cite a simple example:</p> <p>If a hobo or other undesirable character, were to take up residence in a tree in one's garden, then there are few who would debate that one is right in requesting the police to remove his infringement. Should the hobo persist, then one would be able to refer to the courts and there is little doubt that the court would issue a restraining order on the hobo to desist and that such order would be upheld by the country's authority.</p> <p>The same is now true of the public's response to the repeated applications by Vredenburg Wind Farm (Pty) Ltd. Our question is simple:</p> <p>How often can the applicant move the goal posts by renaming their subsidiary company and resubmitting the same application under this simple but transparent disguise and forcing the members of the public to respond? The hobo in a different set of clothes, still remains the hobo.</p> <p>I wish to note that at the public meeting held at the Paternoster Lodge on the 8th of March 2018 to discuss the scoping report for Boulders Wind Farm, that the representatives of Savannah</p>		<p>It is noted that there are areas of conservation value within the surrounds of the project site. The conservation areas are all no-go areas for development. The extent of the West Coast Biosphere Reserve has been considered by the Ecology Scoping Study (Appendix D) and it was confirmed that there are no core areas impacted with the planned development area. Meetings have been held with representatives of conservation bodies to determine the potential impacts, which have been included in the Scoping report. .</p> <p>An impact on the sense of place to the area (including the Paternoster town) has been identified by the heritage, visual and social specialists as part of the Scoping report. The sense of place will be further assessed and ground-truthed during the EIA phase and within the impact assessment specialist reports. The lighting of the facility has also been identified in the Visual Scoping Study (Appendix L), and will be further assessed and ground-truthed in the EIA phase once the layout of the facility is available for an accurate assessment.</p> <p>The perception of the impact on tourism has been identified within the Social Scoping Study (Appendix J). In order to further assess the impact on tourism a Social Impact Assessment will be undertaken, in consideration with a Property Values, Tourism and Economic Issues Report (which will focus on empirical data and tourism trends within the area considering the construction and operation of the West Coast One Wind Energy Facility). It must also be noted that comment on the thriving tourism industry in Paternoster has been received (see comment number 12) which provides an indication that the tourism industry is still strong after the construction and now operation of the West Coast One Wind Energy Facility.</p>
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<p>Environmental (with their director Karen Jodas present) and the representatives of the three companies with shareholdings in the Boulders Wind Farm, being Ronald Bach of Energiequelle GmbH, Candice Evans of Enercon and Jonathan Visser of Integrated Wind Power, were asked directly in the meeting if the applicant was the same as that which made application under the name of Vredenburg Wind Energy Facility. The answer was an emphatic no. This is not true, the applicant at the base of this scoping report for Boulders Wind Farm is Vredenburg Wind Farm (Pty) Ltd, the same as made the application as Vredenburg Wind Energy Facility in 2016. (Please see my expansion on this point of discrepancy under the heading Bona Fide Transparency and Genuine Representation of Public Concern below).</p> <p>Further: I wish to record that the farms specified as above, are in close proximity on all sides but their eastern and south-eastern boundaries, to rural coastal development. The character of these surrounding communities is one of a quiet rural atmosphere, where the pace of life is subdued and is imbued with a close association with the rural character of the surrounding farmlands, the coastal ambience of the sea and the unhurried pace of a community not possessed by the frenetic energy of large cities. As such, they have proved attractive to people to whom such a kind of life is appealing and their choice, like my own, to live in this place is both definite and considered. This predisposition to peaceful, rural character can further be extended to encompass the area's appeal to tourism and the local annual holidaymaker.</p> <p>To propose the siting of a mega scale industrial enterprise in the midst of these communities is therefore not only shocking but, too, diametrically opposed to the value that the vast majority of the residents surrounding the proposed Boulders Wind Farm have consciously chosen. And, should not be considered as anything short of an extreme alteration of the nature of the community as a whole; represented, cherished and invested in by thousands and</p>		<p>The potential impacts of the wind farm on both birds and bats has been identified in the Scoping report (Avifauna Scoping Study (Appendix F) and a Bat Scoping Study (Appendix G) was undertaken as part of the Scoping phase). 12-month monitoring programmes have been undertaken in line with SABAA and BirdLife South Africa's Best Practice Guidelines, and will be further assessed during the EIA phase. The bird specialist has considered the environment that will be affected by the development of the Boulders Wind Farm and will assess this further as part of the Avifaunal Impact Assessment to be undertaken during the EIA phase. The diversity and abundance of priority bird species, as well as their movement across the site and surrounding area will be considered as part of the Avifauna Impact Assessment through the consideration of the pre-construction monitoring which has been completed for the Boulders Wind Farm. In addition, data from a radar assessment as well as on-going monitoring from the West Coast One Wind Energy Facility will be considered, where data is available. Where other data is available from other sources, this will be required to be considered by the bird specialist in the EIA phase to assess the significance of the impact to local bird populations. Contributions in this regard may be formally submitted into the process. The impact on birds considering the West Coast National Park and the flightpath between the National Park and the Lower Berg River Estuary and the significance thereof will be determined in the EIA phase. The impact on endangered bird species and the presence thereof will also be considered in the EIA phase.</p> <p>The comments on the Bat Scoping Study is noted (Appendix G). The impact on bats within the project site will be ground-truthed and further assessed in the EIA phase.</p> <p><u>Conclusion of the category of General Concerns raised by the</u></p>
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<p>thousands of individuals.</p> <p>Further, with regard to the character change that the proposed Boulders Wind Farm would cause to the area: The West Coast Peninsula, extending from the West Coast National Park in the south to the Berg River Estuary in the north is an area of Outstanding Natural Beauty. It is without doubt the area of the single most extraordinary natural features on the entire west coast and one of the highlight areas of natural beauty of the entire South African coastline. This can be borne out by the fact that a National Park has been declared in its southern reaches, The Lower Berg River Wetlands at it's northern extremity, that the entire area is included in the West Coast Biosphere Reserve and more than fifteen other nature reserves or conservation areas, both private and state or municipal, occur in its relatively short reach.</p> <p>To propose a wind farm in the middle of so unique and beautiful an area is diabolical. Outstanding Natural Beauty is not something that can be created and that which we have, should be cherished and nurtured. It is part of our national inheritance and it is incumbent on us to pass it on as such; unblemished, to all South Africans to come.</p> <p>Included in the negative impact caused by the proposed wind farm on the natural beauty of the area would be the town of Paternoster. Paternoster, is one of only two historical coastal fishing villages on the west coast still retaining its vernacular character and one of only three such villages on the entire South African coast. It is therefore of measurable national significance as a town of authentic aesthetic character, national heritage and a real time representation of our cultural history. To blemish the direct outlook of Paternoster town with a gigantic industrial installation would be an act devoid of any social, cultural or historical consideration and a blatant contradiction of the town's aesthetic appeal.</p>		<p><u>application of the Boulders Wind Farm:</u></p> <p>Chapter 2, Section 2.4 of the Scoping report includes the alternatives considered as part of project. The alternatives considered includes site-specific alternatives, activity alternatives, technology alternatives, layout footprint design alternatives, grid connection alternatives and the 'do-nothing' alternative.</p> <p>The proposed project site falls within an area identified as being Negotiable, Possible, Preferred or Highly Preferred for wind energy development, with some small areas indicated as being Restricted in terms of the Western Cape Regional Methodology for Wind Energy Site Selection (May, 2006).</p> <p>It must be noted that a Level 4 Assessment will be undertaken for the Visual Impact Assessment, which will include photo simulations. This assessment will be undertaken as part of the EIA phase.</p> <p>After the initial site suitability process, and identifying the area best suited to accommodate a 140MW facility, the studies thereafter have been concentrated to the current land portions of the project site.</p> <p><u>Bona Fide Transparency and Genuine Representation of Public Concern:</u></p> <p>The EIA process is being undertaken in accordance with the National Environmental Management Act and the EIA Regulations, 2014, as amended. The notification of the I&APs and the public have been undertaken in-line with the EIA Regulations, 2014, as amended. The public participation process has been transparent and fully inclusive and all comments (verbal and written) both in support and against the Application have been recorded. There is no basis for the statement made by the I&AP regarding the "local</p>
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<p>This would be further compromised by the night time light pollution that the proposed wind farm would produce, changing a peaceful cast of southern stars to what would appear as nothing short of a red-flashing-light invasion of aliens. The same conclusion would be true on overcast days with the white flashing lights that are the daytime operating standard of wind turbines.</p> <p>These direct side effects of the proposed wind farm would not only impact on the lifestyle choices of the residents of the town as defined above, but would also have considerable knock on effect on the town's tourism industry which supports a large sector of the population and accounts for a huge portion of the informal income derived specifically by the lower income group from cray-fishing. (Please see my more in depth discussion of the economic consequences, including property values, in Specifics below.)</p> <p>Beyond the human concerns for this remarkable geographical feature are too, the diverse and populous congregations of wildlife that occur throughout the peninsula. Of particular concern in relation to the construction of wind turbines in the area are the potential fatalities of birds and bats.</p> <p>In the Avifauna Scoping Study, I am in strong disagreement with Mr. Miguel Mascarenhas when he states in paragraph 1.2 of his report that "the West Coast National Park is not expected to have great influence on the bird community".</p> <p>Birds fly, and a distance of 30km is easily within the scope of a normal foraging session or move to another area of a great number of the species of birds that occur in the area and which face potentially lethal encounters with wind turbines. This is further exacerbated by the fact that the West Coast National Park and the Lower Berg River Estuary provide ideal habitat for a great number of bird species, especially those prone to flocks, and that the proposed Boulders Wind Farm lies in an almost direct line of flight between the two internationally recognized Important Bird</p>		<p>communities' experience that they are not actively recruited in the announcement of the intention to develop wind farms. That they are further not sought out as communities to present specific thoughts or grievances in relation to the developments direct implications, on both a personal and community level. This becomes compounded by the knowledge that they are not presented with all the facts when they do participate and, finally, they do not feel that their concerns, when expressed, are genuinely considered and weighed with a weight equivalent to that of the developers." All written comments received have been included within the Comments and Response reports (refer to Appendix C8(a) and Appendix C8(b)), as well as all notes for the record from all meetings held in March 2018, as well as all other verbal correspondence (refer to Appendix 7). The following meetings were convened in March 2018:</p> <table border="1" data-bbox="1163 776 1896 1349"> <tr> <td>Heritage Western Cape</td> <td>Commenting authority</td> </tr> <tr> <td>CapeNature</td> <td>Commenting authority</td> </tr> <tr> <td>Ward 11 Committee</td> <td>Local government official</td> </tr> <tr> <td>Britannica Heights Rate Payers and Residents</td> <td>Adjacent landowners</td> </tr> <tr> <td>West Coast Biosphere Reserve and West Coast Bird Club</td> <td>Interested and affected party</td> </tr> <tr> <td>Saldanha Bay Local Municipality and West Coast District Municipality</td> <td>Commenting authority</td> </tr> <tr> <td>Tourism Paternoster</td> <td>Interested and affected party - represents the tourism industry</td> </tr> <tr> <td>Naomi Cloete</td> <td>Interested and affected party - represents the fishing industry</td> </tr> <tr> <td>Danie Kotze</td> <td>Adjacent landowner</td> </tr> <tr> <td>Pierre Heydenrych</td> <td>Affected landowner</td> </tr> <tr> <td>Western Cape Department of</td> <td>Commenting authority</td> </tr> </table>	Heritage Western Cape	Commenting authority	CapeNature	Commenting authority	Ward 11 Committee	Local government official	Britannica Heights Rate Payers and Residents	Adjacent landowners	West Coast Biosphere Reserve and West Coast Bird Club	Interested and affected party	Saldanha Bay Local Municipality and West Coast District Municipality	Commenting authority	Tourism Paternoster	Interested and affected party - represents the tourism industry	Naomi Cloete	Interested and affected party - represents the fishing industry	Danie Kotze	Adjacent landowner	Pierre Heydenrych	Affected landowner	Western Cape Department of	Commenting authority
Heritage Western Cape	Commenting authority																							
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Western Cape Department of	Commenting authority																							

<p>Areas.</p> <p>Included in this group are Cape Cormorants and Bank Cormorants both listed as endangered in the IUCN Red List. These birds are highly gregarious and fly in flocks of thousands and sometimes tens of thousands. It takes little imagination to consider the consequences of such a flock encountering a field of turbines. To further compound this scenario, we are dealing with avian dynamics of which we have little or no understanding.</p> <p>One question that plagues me is how many cormorants are needed to perpetuate a viable population? I am aware that the cynical response is two. But if we for a moment consider the plight of the now extinct American Passenger Pigeon, which occurred in flocks of hundreds of thousands, dense enough to blacken the skies of North America, and were consequently hunted without regard until their dwindling numbers, although finally protected, were not sufficient to make up the giant flocks that ensured the birds survival, then we must admit that we are playing with a situation beyond our understanding, one that can have unforeseen consequences too dire to contemplate.</p> <p>As mentioned above, the Bank Cormorant is on the IUCN Red List as endangered. The Bank Cormorant has breeding sites all along the areas surrounding the proposed Boulders Wind Farm.</p> <p>In the author's opinion, any act that has the potential to precipitate or cause a slide towards extinction is sufficient to render this application beyond consideration. (My further comments with regard to Avifauna can be found under Specifics – Avifauna.)</p> <p>In the Bat Scoping Report Stacey Jordaan and Alicia Thomas-Raw reveal that almost the entire area of the proposed Boulders Wind Farm is of extremely high risk to bats. Bat mortality around wind turbines is higher than any other species. Bats are, too, long-lived and produce one pup a year. The consequences on the four bats species recorded by their investigations are considerable. Their report alone should be sufficient to dissuade us from allowing such</p>		<table border="1" data-bbox="1163 250 1896 553"> <tr> <td data-bbox="1163 250 1528 282">Agriculture</td> <td data-bbox="1528 250 1896 282"></td> </tr> <tr> <td data-bbox="1163 282 1528 347">Coastal Links West Coast Region</td> <td data-bbox="1528 282 1896 347">Interested and affected party - represents the fishing industry</td> </tr> <tr> <td data-bbox="1163 347 1528 412">St Helena Bay Community Representatives</td> <td data-bbox="1528 347 1896 412">Interested and affected parties</td> </tr> <tr> <td data-bbox="1163 412 1528 477">Pierre Heydenrych Farm employees</td> <td data-bbox="1528 412 1896 477">Interested and affected parties</td> </tr> <tr> <td data-bbox="1163 477 1528 542">Nico Lombard Farm employees</td> <td data-bbox="1528 477 1896 542">Interested and affected parties</td> </tr> </table> <p>Community involvement in this process has been invited through written correspondence, notices in public places, newspaper adverts, as well as radio adverts aired on Radio Weskus92.3 FM to inform the broader area of the availability of the Scoping report.</p> <p>All comments received from I&APs have been recorded and included in Appendix C, as well as the comments and responses report.</p> <p>The public participation process for the West Coast One Wind Energy Facility extended between May 2010 and June 2011. The current Boulders Wind Farm application and public participation process is currently open for meaningful participation and has exceed the requirements as prescribed in NEMA. The public participation consultant is able to provide evidence that the process to date has been thorough and that engagement has been at a level considered comprehensive and inclusive of all community stakeholders.</p> <p>It must be noted that the statement made by the I&AP considering Mr. Visser's statement at the focus group meeting held in Paternoster on the 8th of March 2018, is taken out of context as Mr. Visser's statement relate to the construction of power infrastructure (i.e. power line) and not the wind farm.</p>	Agriculture		Coastal Links West Coast Region	Interested and affected party - represents the fishing industry	St Helena Bay Community Representatives	Interested and affected parties	Pierre Heydenrych Farm employees	Interested and affected parties	Nico Lombard Farm employees	Interested and affected parties
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<p>a conscious choice of death to be ignored for our own distant benefit. It would also be interesting to know what the consequence of massive bat mortality would have for the farmers crops in terms of increased pesticide use to offset the lack of insectivorous mammals. And the resultant pollution consequences not only of our natural freshwater systems, but for the final appearance of these pesticides in the oyster nursery at the termination of the watercourse that drains the proposed wind farm site, and finally the sea and its attendant harvest of local bivalves and shellfish.</p> <p style="text-align: center;"><u>Conclusion of the category of General Concerns raised by the application of the Boulders Wind Farm:</u></p> <p>The above broad issues raised in response to the Boulders Wind Farm application are in essence a common-sense reaction to the dramatic change the application would result in for the residents of the area. The question that comes to mind and which I asked at the public meeting held in Paternoster on the 8th of March 2018, is: "In the light of what is clearly a severely opposed proposition (both in the current and previous applications), what alternatives has Vredenburg Windfarm (Pty) Ltd considered?"</p> <p>The astounding answer was: "none". And this, despite the fact that the DEA Best-Practice Guidelines specifically stipulates: "Other facilities within a 30km radius must be considered."</p> <p>Mr. Visser, the representative of Integrated Wind Power, stated that the principal reason the site was attractive was because of the close location of a connection to the national power grid. (Please see my further comments on this under - Bona Fide Transparency and Genuine Representation of Public Concern below). This led me consequently to a cursory research of what other areas might actually be viable site for the establishment of a wind farm by Vredenburg Wind Farm (Pty) Ltd.</p>		<p>No response can be provided as to why the I&AP did not receive feedback from Terramanzi on the previous application and Scoping report due to the fact that Savannah Environmental was not part of any previous EIA process.</p> <p>Regulation 41 of the EIA Regulations 2014, as amended states that "...must give notice to all potential interested and affected parties of an application which is subjected to public participation...". In addition, it should be noted that the EIA Regulations 2014, as amended do not require an EAP to provide a copy of the Scoping Report to I&APs, although I&APs are entitled to comment on the report, written notice of where the report is available must be provided. A notice announcing the EIA process was distributed to all potential I&APs on 26 February 2018. A notice announcing the availability of the Scoping Report was distributed via email to all registered I&APs, including Mr Pickford, on 28 February 2018 (refer to Appendix C). The Scoping Report was made available on Savannah Environmental's online portal, the Vredenburg Public Library, the Paternoster Public Library and the St Helena Bay Public Library for ease of access for I&APs. The proof of distribution of the availability of the Scoping Report notification to registered I&APs was sent to Peter Pickford on 13 March 2018 and he acknowledged that his email address had been included, but that he did not receive the email. Subsequently, the EAP checked the server which distributed the bulk email on 28 February 2018 and no anomalies were received. It should also be noted that a bounced email was not received from the email address provided from Mr Pickford. The representation by hand of parties at the meeting on 8 March of who had received the notification was the vast majority of the attendees.</p> <p>The Public Participation Consultant has considered additional mechanisms to be put in place when distributing notifications to</p>
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<p>It is interesting that on Figure 2.3 on page 30 of the Scoping Report compiled by Savannah Environmental, a map showing areas of desirability and restriction with regard to wind energy facilities produced in 2006 by the DEA, reveals that the proposed Boulders Wind Farm lies in an area designated as possible, but also notably lying adjacent to areas designated as restricted. What this map also reveals is that there are vast tracts of land towards the interior of the country where the designation is highly preferred. This then begs the question: why is Vredenburg Windfarm (Pty) Ltd persisting with the application in an area that stands midway on the preferable scale and is known to draw severe public opposition? It seems to be genuinely as Mr. Visser states, solely because of the relative proximity to a suitable Eskom connection.</p> <p>The West Coast Peninsula is a known area of reliable wind. This has resulted in numerous wind energy facility proposals. Three of these, Isivunguvungu, situated close to Saldanha Steel, Nooitgedacht and St Helena Bay Community Wind Farm, situated east of Laingville at the crossroads of the R399 and St Helena Bay roads, were either approved or pending approval, when the Air Force base at Langebaanweg announced that they would require an 18,5km radius exclusion zone around the Air Force base of all wind farms, to ensure that there was no radar interference. This effectively shut down the development of the three proposed sites above.</p> <p>What now remains within the West Coast Peninsula outside of this Air Force exclusion zone is the area now occupied by West Coast 1 Wind Farm, and the area on its immediate boundary that falls under this proposal by Boulders Wind Farm. Inland, however, and also within the industrial area of Saldanha Bay lie a number of other areas whose designation ranges from possible to highly preferable as specified by the DEA.</p>		<p>recipients and that will request I&APs to acknowledge receipt of future notices related to this project.</p> <p>The West Coast One Wind Energy Facility post-construction monitoring data for birds and bats will be considered by the avifauna and bats specialists as part of the Avifauna Impact Assessment and the Bats Impact Assessment to be undertaken during the EIA phase. The results of the Radar-based Assessment of Airborne Species will also be considered by the avifauna specialist in the Avifauna Impact Assessment.</p> <p>It must be noted that the main objective of the Scoping report is to scope the potential impacts which may occur with the development of the wind farm. This assessment is usually undertaken from a desktop level and does not include the significance of the impacts as well as the ground-truthing thereof. The EIA phase and reporting focuses on verifying the potential impacts identified in the Scoping phase which includes more detail and confirmed data and information.</p> <p>It must be noted that the Boulders Wind Farm will include up to turbines and that the extract taken from the report referring to 'but not limited to' is referring to the associated infrastructure and not the number of turbines.</p> <p>It must be noted that the letter issued by Colonel EP De Villiers of the South African Air Force to Mr Norbet Siepelmeyer of IDP Power, as included in Appendix O, was included as part of the report to confirm the 18.5km buffer required to be applied to the Langebaanweg air force base. Most of the other details of the letter have been subject to change considering the fact that the letter is dated 2013. The relevance of the letter is explained in Chapter 6, Section 6.5.</p>
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<p>It is of particular interest to me as to why Boulders Windfarm (Pty) Ltd has chosen not to seek permission to develop the properties: Farm Waterklip portion 17 of Farm 103, Remainder of Farm 102, Nicolaas Fontein portion 23 of Farm 101 and Honing Klip portion 24 of Farm 101. These areas lie adjacent to the already established West Coast 1 Wind Farm and, as far as Map 3 of the Appendix L - Visual Scoping Study shows, lie well concealed from visual impact and in a natural valley whose depression would possibly help negate the negative impact on avifauna.</p> <p>To Summarise: The West Coast Peninsula is a unique and irreplaceable area of Outstanding Natural Beauty with world-class populations of marine and other birds, many on the IUCN Red List; it is in the interests of the entire nation to keep it as such and ensure its ongoing viability from every aspect.</p>		<p>It should be noted that the accessing the Scoping Report via the electronic portal has been made available for I&APs convenience. Access to the report via the Savannah Environmental website remains unrestricted to all interested and affected parties. The online portal supports the EAP in maintaining a complete and accurate record and database of all parties who have interest in the project (and who choose to access the report via our online portal), in line with the requirements of the Regulations.</p> <p>Regarding the question raised by Deon Brand at the focus group meeting held at Paternoster on the 8th of March 2018, the maps included as part of the Scoping report includes the entire project site assessed as part of the application for Environmental Authorisation. the entire project site has been subject to specialist considerations during the Scoping phase. The map referred to by Mr. Deon Brand is Figure 7.19 of Chapter 7 which illustrates the area considered to have the high potential for the development, as well as the area considered to be less favourable. This map was compiled following the sensitivity analysis of the project site which provides the reader with a better understanding of the preferred development area within the larger project site, following the analysis. The approach being followed is a 'funnel-down approach' which includes the implementation of a mitigation strategy with the focus of avoidance, then minimisation and mitigation.</p> <p><u>Specifics:</u></p> <p>The concerns raised by the I&AP on the Avifauna Scoping report is noted. The concerns will be communicated to the avifauna specialist for consideration during the EIA phase and as part of the Avifauna Impact Assessment.</p> <p>It must be noted that the meeting held with Tourism Paternoster at</p>
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This is of particular relevance with regard to the following parameters as set out by the Western Cape Department of Environmental Affairs and Development Planning:



The irony that arises in my mind from the above discussions is this; The demand for national security can carte blanche and without question ensure that wind farm development does not proceed, but what is the point of ensuring our national security toward external threat, if we cannot defend and ensure our national treasures from within?

Bona Fide Transparency and Genuine Representation of Public Concern:

In the various meetings, conversations and informal discussions that I have had with the numerous people expressing concern over the proposed Boulders Wind Farm application, a disturbing trend has emerged. The local community feels as if it has been duped by

the Lodge in Paternoster on 08 March 2018, was not a public meeting but rather a focus group meeting focused on consulting with the tourism representatives within the town. The results of the Radar-based Assessment of Airborne Species undertaken for the Vredenburg site will also be considered by the avifauna specialist in the Avifauna Impact Assessment.

The EIA process is a holistic process which considers both environmental and social impacts as part of the application for Environmental Authorisation. DEA, being the competent authority, will consider all impacts and aspects of the project (including all comments received) in order to make an informed decision on the application.

The information included in Appendix B – Authority Consultation of the Scoping report, specifically the initial findings included relates to the finding of the Terramanzi Scoping report and not the Visual Scoping Study undertaken for the EIA process now. The information included was to provide the DEA with information on the project and potential impacts as part of the pre-application meeting, prior to the undertaking of the current EIA process.

All the detail and information contained in this comment will be referred to the relevant specialists for their consideration in the EIA Phase.

Appendix J(a) – Property Values, Tourism and Econ Issues Report, has been compiled in order to inform the Social Scoping Study (Appendix J) and provide supporting empirical data, not to evade any issues but rather to support the findings from a quantitative perspective. It must also be noted that the Property Values, Tourism and Econ Issues Report was not a specialist impact assessment report but rather provides supporting documentation to the social assessment. The concerns raised by the I&AP on the

<p>both the companies making the application and the companies charged with undertaking the scoping and actual reports representing public participation of the EIAs pertaining to wind farm developments. There is now an attitude of sincere distrust. I understand it, to stem from the local communities' experience that they are not actively recruited in the announcement of the intention to develop wind farms. That they are further not sought out as communities to present specific thoughts or grievances in relation to the developments direct implications, on both a personal and community level. This becomes compounded by the knowledge that they are not presented with all the facts when they do participate and, finally, they do not feel that their concerns, when expressed, are genuinely considered and weighed with a weight equivalent to that of the developers.</p> <p>Perhaps a review of the entire EIA process with specific attention to wind farms needs to be undertaken to remedy this.</p> <p>A brief history of the local communities experience leading up to the presentation of the Boulders Wind Farm application will help put the matter in perspective.</p> <p>Wind Farm 1 came as an unpleasant surprise to many residents of the West Coast Peninsula, myself included, when we were presented suddenly and without warning with the construction teams erecting the massive wind turbine structures, just outside Vredenburg. I personally was out of the country on assignment during the process leading up to the approval of the West Coast 1 facility, but for many of the other residents, the measures in place to ensure public participation as required by the DEA were insufficient to engage the public on a broad scale and they were passed over. Wind farms are at the moment in South Africa almost exclusively developed in rural situations. Their introduction represents a chronic alteration of the environment from rural to industrial. And although their industrial presence is comparatively</p>		<p>Property Values, Tourism and Econ Issues Report will be considered by the specialist in the EIA phase. It must also be noted that the perceived impacts on tourism and property values is at this point considered to be a perception of the residents within the area. However, these impacts will be ground-truthed during the EIA phase.</p> <p>It must be noted that the operation phase will create up to 50 employment opportunities, rather than 28, as stated by the I&AP.</p> <p>It must be noted that all relevant information pertaining to the Boulders Wind Farm Scoping report has been made available in a transparent manner for a 30-day review period.</p> <p>It must be noted that the information included in Appendix O, with specific reference to the letters of support provided, were undertaken outside of the EIA process for the Boulders Wind Farm and is not included and considered as part of the public participation process being undertaken for the project now. These are included as additional information for consideration by stakeholders as well as the competent authority.</p> <p>The objection of the I&AP towards the Boulders Wind Farm is noted.</p>
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<p>clean, they do present substantial hazards to the wildlife that are generally considered as important, integral and often with affection by the communities that live in rural situations. A wind farm facility is tall and therefore has ramifications that extend beyond the DEA's current requirement that only all immediate neighbours be contacted for their comment. The extent of a wind farms influence is directly related to its visibility and the public participation process fails to address this. Adverts in the local and national newspapers help to dispel the above to some extent, but can it be considered a genuine attempt at garnering public sentiment, comment and reaction to a proposed wind farm development to place a single advertisement and assume that an entire community will take heed?</p> <p>The case of West Coast 1 is a case in point, where it most certainly did not. When the West Coast 1 did come to the attention of the public, it was as "<i>fait accompli</i>". Yes, the companies charged with producing the scoping reports are satisfying the minimum required notifications for public participation of an EIA, but the emphasis is on MINIMUM and not once has any of them in the West Coast Peninsula developments, shown a sincere and thorough effort or will to engage the public on a level that could be considered comprehensive and reflect a true and authentic cross section of the concerned community and its views, comments and objections.</p> <p>The West Coast Peninsula communities are now facing the domino effect of West Coast 1 having been approved without their real participation, where the effect of "because the first one has been passed the subsequent applications will be approved more easily". The case in point is demonstrated by Mr. Visser's statement at the public meeting held at Paternoster on the 8th of March 2018, of "the site is most desirable because of the close proximity of the suitable Eskom connection".</p> <p>To summarise:</p>		
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<p>a) West Coast 1 was in fact at the time of initial wind energy facilities proposals not one of the preferred sites because it was in fact at a substantial distance from the Aurora Substation.</p> <p>b) It was only the Air Force's enforcement of the 18,5km radius that suddenly put it in a preferable light, when other preferable sites had to be abandoned.</p> <p>c) Only on the successful application for West Coast 1 did Eskom cover 75% of the cost of providing a 132kV line to the facility.</p> <p>The bottom line is, if the public had been consulted in a bona fide manner at the scoping stage of West Coast 1 then, judging from the current response to the proposed BWF, there is a strong possibility that West Coast 1 would not have come into being.</p> <p>This, however, as stated above, is "fait accompli" and now the domino effect applies where the 132kV line, - supplied by Eskom at taxpayer cost - to a wind energy facility that did not enjoy genuine public participation, (as perceived by the communities of the West Coast Peninsula), becomes the principal attractive feature of developing a further wind energy facility at the proposed site. To elaborate on the idea of minimum possible effort of the companies compiling scoping reports and EIAs: The posting of public notices along the boundaries of the proposed development site are required practice. But the pieces of paper posting the notices as per pages 1 – 5 of Appendix C2 Advertisements & Site Notices of the scoping report for BWF, where these notices are sheathed in thin sheets of plastic placed out in the open in an area where wind is the primary concern of those posting the notice, can, in the opinion of this author, be seen as minimal compliance and a far cry from a bona fide attempt to engage interested and affected parties. This lack of bona fide attempts to engage the public and thereby gain a true representation of the affected communities is now an historic element of wind farm developers and their associated environmental agencies perceived role in wind farm</p>		
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<p>applications for the West Coast Peninsula, and can be further borne out by the following occurrences in my own experience.</p> <p>I initially became aware of the Terramanzi notice of the Vredenburg Wind Farm Facility proposal when I stopped on the district road to pick up two pieces of paper blowing down the road. They turned out to be the notices of the proposed development.</p> <p>I registered as Interested and Affected party and wrote a detailed response to the scoping report. I heard absolutely nothing further, and to this day have not in any way been further informed as to the consequence of the scoping report or as to why the application has seemingly been retracted. This has left me entirely uninformed as to any official reaction to the scoping report and its public response and leaves me with the uneasy feeling, which arises naturally when someone does not answer your query, that the respondent wants to avoid communication and is therefore wishing to keep something from you. In this case, I thought that perhaps matters came to light that the applicant could not circumvent or overcome and instead ditched the project and decided to start anew with another proposal that sidesteps the issues that possibly stood in their way, or is merely making a second attempt to apply in the hope that the public are less responsive.</p> <p>This is an entirely unsubstantiated, subjective response but it is real and its knowledge has tainted my further dealings with any wind farm applicant and particularly Vredenburg Windfarm (Pty) Ltd. That this response is valid however is endorsed by the following: Vredenburg Windfarm (Pty) Ltd was behind the application for which Terramanzi produced a scoping report in 2016. Numerous members of the public registered as Interested and Affected Parties (I&APs), myself included, and many of these and others submitted comments on this proposed development of a wind</p>		
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<p>energy facility.</p> <p>Vredenburg Windfarm (Pty) Ltd, the same company, is behind the current application for the Boulders Wind Farm development. Vredenburg Windfarm (Pty) Ltd therefore is in possession of the list of historically registered I&APs and both their and other comments from the public and official bodies for the exact same type of development in almost exactly the same location and yet they have chosen not to contact those members of the public previously registered as I&APs. WHY?</p> <p>Whatever their response, and no matter how much it may be couched in legalities, it is clear that they are not seeking bona fide and transparent development of their project where a development to the satisfaction of all parties concerned can be tabled.</p> <p>I registered as an Interested and Affected Party for the proposed Boulders Wind Farm on the 15th of December 2017 and received confirmation of such from Savannah Environmental on the 18th of December 2017.</p> <p>To date all my emails to Ms. Gabriele Stein, Savannah Environmental's liaison person have been received and her personal email responses have without fail been delivered. However, her email of the 26th of January 2018 as detailed in Appendix C5 – Stakeholder Correspondence and titled EIA Process-Boulders Wind Farm Western Cape Province: Notification of EIA Process and Availability of BID, never did arrive in my email, despite the above record of showing the email as including my address. Neither did her email, not presented in the above appendix but reputed to have been sent at the end of February 2018, informing I&APs that the scoping report for Boulders Wind Farm was available for comment and that comments must</p>		
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<p>be submitted by the 3rd of April 2018. I would record here that never has an email that I have been sent in any other business dealing with any other party (including Ms. Stein's other emails) ever failed to arrive or gone missing. I did a thorough check of all my mailboxes including spam and junk and I have no record of either of the two very important above notices ever arriving.</p> <p>This may be pure coincidence, but it feels otherwise. I was further interested to learn at the public meeting held at Paternoster on the 8th of March 2018, that I was not alone in not having received the notice of the availability of the scoping report for BWF and that, of the other registered I&APs, at least 50% had not the received notice. It may be coincidence but it further seemed to me that those who had not received the notice were amongst the more vociferous opposition to the proposed BWF.</p> <p>Again this may be coincidence but so many negative coincidences begin to add up to a different sum in the minds of those wishing a fair and transparent discussion.</p> <p>Other issues that raise the question of a bona fide transparency and genuine representation of public concern are: West Coast 1 Wind Energy Facility has been in place for some time and as such has been able to gather specific data with regard to important factors as far as bird and bat mortalities are concerned. Why do the Avifauna and Bat scoping reports not seek to record these, surely they are of vital importance to the understanding of the potential impacts of a similar development adjacent to the current facility?</p> <p>In the absence of these reports, one is forced to assume that either West Coast 1 do not want to share these statistics or that BWF and Savannah Environmental do not want to reveal facts that may jeopardize their application. During the public meeting held at</p>		
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<p>Paternoster on the 8th of March 2018, I asked Ms. Karen Jodas if studies on bird movements had been conducted as part of the Avifauna study and in particular if studies had been done at night? Her response was yes, radar has been used to conduct nighttime studies. If this is so, then why are the results of these studies specifically excluded from the Avifauna Scoping Report?</p> <p>Again, we the public, are left guessing, with the further endorsed assumption that we are not being shown the full hand of the proposed development, just selected information that specifically excludes that which might bias the scoping report against the proposed development proceeding. If this is the case with the Avifauna Report, then the entire scoping report can be considered flawed in the first instance and intentionally deceitful in the second instance.</p> <p>Throughout the scoping report and its associated documents, the developer makes the statement: (quoted here from page 2 of the Background Information Document) "for the development of up to 45 wind turbines". However, on page 3 of the same document, the wording is subtly different, stating: "the associated infrastructure which is required for such a facility including, but not limited to: Up to 45 wind turbines..."</p> <p>The inclusion of the phrase not limited to is an absolute contradiction of any finality of project limitations stated elsewhere, opening the door to unlimited possibility and raises the suspicion that the developer is not being entirely transparent in their statements. This suspicion is further endorsed by the letter issued by Colonel EP De Villiers of the South African Air Force to Mr Norbet Siepelmeyer of IDP Power where in paragraph 2 a. he states: "In principal and based on developments in the vicinity, prior approvals and the possible combined impact on military surveillance systems, the SAAF has no objection to the construction</p>		
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<p>of a maximum of 45 turbines during the first phase." What is Colonel De Villiers referring to as a First Phase? Are the communities of the local area going to be subjected to yet another wind energy facility application should the BWF application be approved? Is it Vredenburg Windfarm (Pty) Ltd's intention, through successive incremental applications to finally introduce wind energy facilities throughout the West Coast Peninsula? Why has the Air Force been made privy to these intentions and not the public?</p> <p>I would further note that Savannah Environmental, in offering the Scoping Report of the Boulders Wind Farm to the public on their website do not actually allow the download of the documents but require that the public must first "register", stating the following: "For security reasons, we have limited access to these downloads. In order receive a password to access the documents, please contact us by sending a request and your interest in this project to rozanne@savannahsa.com."</p> <p>I am curious as to what the security reasons so quoted might be, particularly as the documents in question are for the public record?</p> <p>Instead I propose that this registration requirement, necessitating email correspondence, is no more than a purposeful hurdle to dissuade cursory interest and further investigation. Ask any entity running a commercial enterprise on the internet and they will tell you that the more steps people have to undertake to reach a final goal, the less likely they are to see it through to the end. Every one of us knows this from our own experience.</p> <p>In the arena of influence that the cumulative distrust as elaborated above incurs, the question of Mr. Deon Brand at the public meeting held at Paternoster on the 8th of March 2018 is of significance. He asked, when showed the map that appears on page 4 of the Appendix Q – Maps, "Why do you show us the all</p>		
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<p>these farms as part of the proposed Boulders Wind Farm and then suddenly scratch out half of them with this black striping, and tell us that where you are going to develop is just the green areas? Why don't you just show us what you really want to do? Is the wind farm site just the green areas or the whole map that you outlined initially?" His question reflects a gut feeling that all of us registered as I&APs have. It boils down to a question of trust and the record thus far, at every instance, proves that the public would be foolish to place their trust in Vredenburg Windfarm (Pty) Ltd and its agents and partners. Not once has their record shown an intention of bona fide transparency or genuine representation of public interests and concerns.</p> <p style="text-align: center;"><u>Specifics:</u></p> <p>I wish to note that for the sake of brevity I shall confine my comments here to the areas of my expertise, experience and high concern. I shall, therefore, not address archaeological or auditory concerns, but note that this should not in any way be seen to diminish the importance of these aspects and the relevance of their consequence in light of the Boulders Wind Farm application.</p> <p>Avifauna Report: I would like to summarise what I feel are pertinent and important points of the Avifauna Report and elaborate on those. The report was compiled by Bioinsight whose agents visited the site 10 times during a 12- month period from 2014 to 2015 and a further single visit a year later. The site visits confirmed 119 of the potential 252 bird species to be present. Of the 252 potential species, 21 species are of special conservation concern including: 11 Endangered species 10 Vulnerable species as well as a further area of concern with 12 Near-threatened species.</p>		
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<p>Of the 119 species that Bóinsight recorded 32 are considered to be potentially sensitive to wind energy facilities. Of these 32 species there are 13 that have Red List conservation status, being:</p> <p><u>Endangered:</u> Cape Cormorant, Martial Eagle, Black Harrier, Ludwig's Bustard</p> <p><u>Vulnerable:</u> Great White Pelican, Verreaux's Eagle, Secretary Bird, Lanner Falcon, Southern Black Korhaan, Caspian Tern</p> <p><u>Near-Threatened:</u> Greater Flamingo, Lesser Flamingo, Blue Crane</p> <p>It is therefore with surprise that I read in the executive summary of the report written by Mr. Miguel Mascarenhas "that there are some areas of probable medium sensitivity for bird communities...". Mr. Miguel Mascarenhas further surprised me when he wrote "A second IBA (Important Bird Area) is located approximately 30km south (of the proposed BWF), coincident with the West Coast National Park, and is not expected to have great influence on the bird community present at the proposed site." To complete my amazement, Mr. Miguel Mascarenhas, on finding a Secretary bird nest (registered as a Red List Vulnerable species) suggested that an exclusion zone of 500m around the nest be established as a no-go zone.</p> <p>With due respect to Mr. Miguel Mascarenhas, birds fly, and his report, in confining itself virtually to the proposed site only, presents neither a realistic nor a comprehensive view of the potential lethal effects of placing a field of wind turbines in the middle of an area with prolific bird populations. The tone of his whole report is mild, understated and retractive, but he is dealing with a number of species closing towards extinction and to adopt a medium probability stance in the face of these vital conservation issues is, in my opinion, a dereliction of the duty placed on him in compiling this report. To expand on one point by way of example:</p> <p>On page 16 of his report he states: "The proximity to the coastline in the west, north and west, increases the likelihood that the</p>		
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<p>proposed site is used by maritime species instead of just terrestrial species."</p> <p>What if his mild assumption proves correct for just one flight of Bank Cormorants? In a single stroke it would bring far closer to the edge of extinction a specie already under serious threat.</p> <p>Bank Cormorants have a small breeding colony a few hundred meters from where I live. As stated in the registered I&APs, my property is 1,7km from the proposed site. Can we really stake an unswerving belief that they will never stray the 2km into the proposed field of wind turbines, or do we acknowledge that it is a possibility? The same is true for many of the 252 bird species that Mr. Miguel Mascarenhas so nonchalantly walks a circumspect circle of potential hazard around. The area under scrutiny is utilised by a number of migrant species. The black harrier for example, an endangered species, is relatively well represented in the area. A single individual fitted with a radio collar, spent several months in the West Coast Peninsula area and then, in a short 2-day period, migrated to the border of Lesotho. There could be no better example of the far-reaching impact that the proposed BWF would have in avifauna mortalities. To confine himself therefore almost exclusively to the site, renders Mr. Miguel Mascarenhas' report, to borrow his own terminology, of low validity.</p> <p>I have already commented on the fact that it seems incredible that Mr. Miguel Mascarenhas is prepared to discount entirely the fact that the proposed wind farm lies in an almost direct line of flight between the two worldwide recognized Important Bird Areas of the West Coast National Park and the Lower Berg River Estuary, but my earlier comment was confined to daylight hours. The same concern is too, of even greater relevance at night. Birds tend to fly higher at night and this, combined with the reduced vision that darkness imposes, would serve to increase their exposure to potential lethal encounters with the turbine's blades.</p>		
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<p>I note further that Ms Jodas of Savannah Environmental informed me in a public meeting that night time studies of bird activity at the proposed site had been conducted with radar and I note consequently that the results of these studies have not been included in this report.</p> <p>We also have the further complication that Mr. Miguel Mascarenhas fails entirely to address the issue of the effect of the lights of the turbines at night on bird activity and movement. Currently, I can find little information that deals with this subject and assume that no conclusive studies have been made in this field. It is therefore of more than medium concern as to what affect the lights would have on birds' navigation and in particular with regard to migratory species that pass through the area, from those that occur singly such as the European Nightjar right through to those that occur in flocks of thousands such as the Arctic Tern. To fail to address all issues that a wind energy facility presents such as the above, is to fail to present a thorough and comprehensive study. To withhold information that is available and pertinent to the report (as is possibly the case with the study of night time activity of birds and the avifauna mortality reports of West Coast) would be a direct attempt to subvert the outcome of this report. I ask here, for the respondent's clarification to myself, all I&APs and the DEA.</p> <p>Bats:</p> <p>Amongst all the reports compiled for this scoping study, the Bat Report stands out as thorough and un-ambivalent in its conclusions. The consequence of allowing BWF to proceed would be catastrophic for the local bat population. The interesting question then arises:</p> <p>Does BWF, knowing the consequences for the bat population still wish to proceed and if so at what point will reports that stand contrary to their final goal be considered of sufficient importance</p>		
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<p>to have them seek an alternative site? Ultimately, these questions must land on the desks of the authorities in whom the public have placed their trust to make balanced and informed decisions. It becomes then a question of what weight does one accord one aspect against another? For those of us resident in the West Coast Peninsula, what we seek above all else is that the weight of every argument be given equal gravity.</p> <p><u>Visual Scoping Study</u></p> <p>The visual report, although inconclusive in defining the repercussions of the project and the ultimate designation of sanctioned areas, does present an accurate reflection of the visual impact of the proposed BWF as outlined in Figure Map 3 on page 14 of the report. What we see from this map is that for the vast majority of the proposed site, the turbines will be visible. For those of us familiar with the area, this visibility is of primary concern from areas developed as urban by the local Saldanha Bay Municipality where it will directly affect the outlook of properties, imposing dramatically on what the visual report aptly describes as "The study area has a rural character with very few structures built outside of the previously mentioned town boundaries. Exceptions occur at West Coast 1 WEF where 47 wind turbines are operational and clearly visible."</p> <p>I wish here to register my sincere disagreement with the statement set out in Appendix B – Authority Consultation (EC), which specifies under the heading Initial Findings on page 11, that the proposed 45 turbine layout, with medium to high visibility, be considered not a fatal flaw. How can it possibly be deemed fair, reasonable and just to initiate and develop an urban environment of distinct rural character, together with extraordinary natural scenery and beauty, allowing that character to persist for 50 years or more, all the while encouraging individual investment in the local municipality and community, and then summarily change that</p>		
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<p>character at the whim of industrial development and say that this does not constitute a fatal flaw? It is a fatal flaw, with repercussions pertaining to thousands of individuals, not only on our choice of lifestyle and life's environment, but too on our combined financial investment whose sum is certainly in excess of that of the proposed development and worthy of far more employment than the proposed WBF is claiming it might have. West Coast 1 is already an unwanted and extreme visual impact, we do not want more.</p> <p>It is further noted that virtually all commentators on the visual impact and its negligible ramifications are not local. The tone of local response to the visual impact can be summed up as the absolute opposite. This seems an opportune time to review the remarkable Appendix J(a) – Property Values, Tourism and Econ Issues Report. Seldom, in all my years of referring to official documents for background information pertinent to my writing have I ever come across so blatant an attempt at evading issue as this report. The Property Values, Tourism and Econ Issues Report is little more than a collection of primary economic statistics and figures garnered from the internet, with no sincere attempt to interpret them in the context of the proposed BWF and its ramifications and where Urban-Econ does take a step in that direction, it is without fail to endorse envisaged employment opportunity from BWF, with undisguised bias. I note that within their report Urban-Econ neither provides a statement of their qualification leading to the authority to author such a report, (although Ms. Broughton's CV is noted in Annexure A) nor, and more importantly, their impartiality, which given the following points, I call seriously into question. On page 9 of the Urban-Econ Report Figure 2-2 shows that the Trade, Catering and Accommodation sector of the Saldanha Bay Municipality falls second only to agriculture in terms of employment providers, offering nearly twice as many jobs as the next commercial sector.</p>		
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<p>And yet, without any break in their stride Urban-Econ on page 14 under paragraph 2.4.2 Potential Effect on Tourism state that tourism in Paternoster continued to increase after the completion of West Coast 1, and so extrapolate - without consideration of the long history of Paternoster as a tourism destination, its commercial sectors ongoing advertising and promotional spending, and further that West Coast 1 is at a distance from Paternoster to arguably minimise its effect, - that the proposed BWF, with its proposed footprint directly in line of sight from the main seafront promenade of Paternoster will continue not to affect the reaction of tourists to the area. Really? If you were offered a choice of a seafront suite with a view of the sea and bay beyond, and an identical suite with the same view, but a wind turbine in your direct view, which would you choose? Urban-Econ further summarise this finding in their boxed summation as follows: "The impact may be positive or negative" I have to ask exactly what does the above statement say? The summation goes on to state: "The impact will take place on the project site, therefore on a local scale" Is this a complete disregard for the visual impact report or merely unthinking bias? This same incredible fence-sitting standpoint continues to invest itself throughout Urban-Econ's report. In addressing property value influences anticipated as a result of the proposed BWF the report states in summation: "Property market activity will be stimulated or deterred by the prospect of a wind farm". Does Urban-Econ not realize the incredible bias that this non-statement underwrites?</p> <p>It takes little or no imagination to realize that 99.9% of people when faced with a view without a wind turbine or with a wind turbine, would opt to have an unobstructed view and doubly so when their choice of place to live or visit on holiday is one such as the West Coast Peninsula, a place of quiet rural character and Outstanding Natural Beauty. This concept of negative influence is further underwritten by wind farms nighttime light pollution, making the sphere of their influence uninterrupted, continuous for the full 24</p>		
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<p>hours of the day.</p> <p>The same summation continues unabashed in its shameful ambiguity to state: "The impact may positively, negatively or neutrally influence a prospective property investor/buyer."</p> <p>This is not true. The only persons or institutions that may be positively influenced in purchasing property would be like minded industrial developers, whose purchase and interest would stand in direct opposition to the current status quo of the rural character of the land.</p> <p>The fact that the proposed BWF would negatively influence property value is readily understood by anyone reacting to my earlier proposed question of a room with a view. The argument for negative influence on property value is readily endorsed by merely taking note of how many I&APs registered for this report, are from the community of Britannica Heights. No less than 48 of the registered I&APs are Britannica heights residents. It does not seem unreasonable to assume that this represents the majority of the Britannica Heights community, and their registration as I&APs can easily be understood to stem from a concern for the view in which they have invested in and its subsequent influence on the values of their properties. Investments that were made in good faith that the Saldanha Bay Municipality would, in having developed the ridge of the hills above St Helena Bay as a suburban extension, ensure that the views that made this suburban extension so attractive to development, continue to ensure that the said views remained intact and unspoiled. The municipal manager, Dr. P.Voges, email of the 11th of September 2017 to Mr. J.Visser of Integrated Wind Power, (Appendix O, page 14) appears to contradict this good faith and requires explanation and further investigation as to the municipality's right to sanction such radical change upon the good faith of its community without consultation.</p>		
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<p>Within the paradigm of the economic implications of the proposed BWF, the case of Britannica Heights property value, is a useful case to study and from which to extrapolate conclusions for all the surrounding communities, something that Urban-Econ's report fails entirely to do and which Mr. Tony Barbour's Social Scoping Report (Appendix J) does address, but fails to elaborate on to any satisfactory degree. As borne out by my arguments above, the development of a wind farm on the site proposed by BWF would negatively affect the value of properties of Brittanica Heights. Currently a developed property on Britannica Heights is for sale at 7 million rand. If we assume a conservative stance of a 5% reduction in value should the proposed BWF proceed, then this represents a loss of R350,000.00 to a single owner. Extrapolate this over 100 developed properties and we come to a figure of 35 million rand and this does not take heed of undeveloped erven of which there are hundreds in Britannica Heights. If we then take just this loss and apply its sum to the proposed 28 jobs that BWF stands to provide on an ongoing basis, then we can clearly see that just this single isolated financial concern, outweighs the potential positive influence offered by the proposed BWF.</p> <p>To end our assumption here, however, would be to perpetrate what I am criticizing in the entirety of this Scoping Report, a lack of authentic examination of the full spectrum of the consequences of the proposed BWF.</p> <p>If property value does drop in Brittanica Heights as a result of the implementation of the proposed BWF, then we can assume that the entire process of development of the currently vacant erven will proceed at a slower pace. This will have direct repercussions on the construction industry of the area.</p> <p>Just a single residential dwelling not being built because of the negative effect of the wind turbines on the views offered by the Brittanica Heights properties, will be of direct consequence to not only the labour force required for such a project and which force</p>		
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<p>certainly exceeds 28 employed persons (the maximum job opportunity that the proposed BWF will offer on an ongoing basis), but, too, on all the associated local commerce which supplies materials and other skilled services.</p> <p>If we were to further extrapolate the negative impacts as envisaged above to the community of Paternoster and its lively tourism business then we must acknowledge that any negative influence on the tourism has repercussions not only for the construction of further tourism facilities, but, too, on those currently in existence and their associated employment of hundreds of people and especially those in the lower income sector of the community.</p> <p>The proposed BWF may offer large scale investment in the country but if you are a waitress in Paternoster without a job, the investment means nothing to you except to be the distant cause of an industry which has dramatically altered your whole life. This would be true for a great many people. People not represented anywhere that I can find in this Scoping Report. The proposed Boulders Wind Farm one attractive feature is that it does offer substantial employment opportunity during the construction phase and a clean energy alternative, but this would be true of any site that Vredenburg Windfarm (Pty) Ltd would look to develop.</p> <p>Other than this the creation of 28 jobs cannot be seen as reasonable or sufficient justification of the dramatic and far reaching spectrum of compromises that the entire local community of thousands of people would be required to make to accommodate the proposed Boulders Wind Farm.</p> <p>Neither can it be proposed that such small-scale employment in any way warrants the potential, and currently unquantifiable, destruction of wildlife that the wind farm would undoubtedly wreak</p>		
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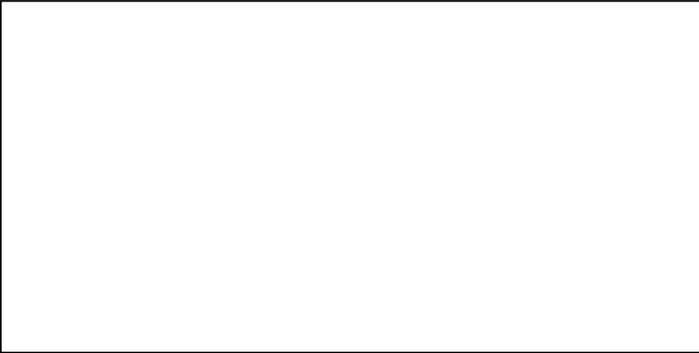
<p>on so potentially sensitive and thriving a community of species rich fauna and especially so, on species that already stand Endangered.</p> <p>Nor should these 28 jobs be seen to be reasonably accountable for - in the scope of our history as a conservation aware society - the permanent and irrevocable destruction of an area of Outstanding Natural Beauty, which can only be estimated in value in terms of our national inheritance, a value directly relevant to millions of people.</p> <p>In Summation of the Boulders Wind Farm Proposal: In summation, it is clear that the proposed Boulders Wind Farm crosses many sensitive boundaries. Not only in terms of its impact on the community that surrounds the proposed site, but, too, on the prolific and varied natural species that use and pass through the proposed site, and finally in its irrevocable alteration of an area of Outstanding Natural Beauty and significant archaeological interest. It is further clear that Vredenburg Wind Farm (Pty) Ltd has not only, not adequately taken these issues into account, but would seem to actively attempt to avoid their disclosure or discussion in a one-sided attempt to push their project through. This, (aside from the above in-depth discussion) is endorsed by the Scoping Report's Appendix O Additional Information, where Vredenburg Windfarm (Pty) Ltd presents a wholly biased "positive only" view of their proposed development, reporting glowingly of the advantages from their own perspective, but failing entirely to address any possible adverse issues that their proposal may inflict. So biased is this report, that it goes as far as including a single positive response to their development from a Mr. Ryno Summers, a resident of Paternoster, but failing to include any of the multitude of negative comments or observations, my own included, that are in their possession from the 2016 Scoping Report carried out by Terramanzi.</p>		
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<p>The express purpose of an Environmental Impact Assessment is to table all factors that a development proposal raises and to present all of these in a forum of open and transparent discussion. What Vredenburg Wind Farm (Pty)Ltd patently fail to bring to the table is a list of alternative sites. South Africa is a large country and it is not possible that there are not other potential sites for the placement of their wind energy facility, and, more so, ones that do not present so extremely large a scope of compromise in every sphere of influence required by the local community for so little in return. If we were to assume that Vredenburg Wind Farm (Pty)Ltd were to develop anywhere within a 100km radius of Vredenburg, or anywhere else in South Africa, then it is obvious that the single positive influence of their development, employment in terms of our national employment, would remain a common factor. It can therefore be reasonably subtracted from the proposed development of the Boulder's Wind Farm. We must then examine the trade-off that Vredenburg Wind Farm (Pty)Ltd is offering the West Coast Peninsula community, specifically, in return for the extreme and all-encompassing compromise that their development will inflict upon the lives of thousands of people, birds, bats, other wildlife and a unique landscape. The answer, just short of zero, is a single token community project, held out like the proverbial carrot to the donkey. I have investigated the same community project incentive offered by West Coast 1. It amounts to teacher training in classroom discipline at the local high school. It is patently obvious that this does not in any degree balance the compromises required. It is therefore, in consideration of all of the above, when answering the question: should the Boulders Wind Farm proposal be allowed to proceed? That the irrefutable and resounding answer is NO.</p>		
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NO.	COMMENT/ISSUE RAISED	RAISED BY	RESPONSE
47.	<p>To the below I add that sun is plentiful on the West Coast and Solar in conjunction with and on the same land as the existing wind generators makes much more sense than further polluting our visual environment with the omnipresence of a second windfarm, the lights of which are more disturbing at night than sight of the wind turbines in daytime.</p> <p>The local community received no benefit from the previous installation and another would be no different. Unless quantified in detail and enforceable it should in my view not form part of the scoping report where it has become no more than standard padding.</p>	<p>Deirdré Lubbe Interested and Affected Party Voyage Yachts Email: 27-03-2018</p>	<p>The use of solar as a technology alternative for the project site has been considered in Chapter 2, Section 2.4.3. Solar energy technology would not be viable within the project site location due to the topography of the landscape as well as the increased development footprint impact it poses on agricultural land (i.e. total loss of an area located within the development footprint of a solar energy facility). Solar energy developments are much more viable in those parts of the country which experience a higher solar irradiance.</p> <p>The lighting of the Boulders Wind Farm has been identified by the visual specialist as a potential visual impact (Visual Scoping Study, Appendix L). The impact will be ground-truthed and assessed further during the EIA phase.</p>
48.	<p>I have properties in Paternoster on the northern side therefore interest. Please register me as an interested and affected party.</p>	<p>Achim Sehm Interested and Affected Party Paternoster Resident Email: 27-03-2018</p>	<p>Achim Sehm, a resident of Paternoster has been registered as and I&AP on the project database.</p>
49.	<p>The draft Scoping Report (SR) dated March 2018 and received by this Department on 28 February 2018, and the acknowledgment letter of the application form and the draft SR issued by this Department on 02 March 2018 refer.</p> <p>This Department has the following comments on the</p>	<p>Lunga Dlova Case Officer and Pumeza Skepe- Mngcita Deputy-Director:</p>	<p>i. All issues and comments received on the Scoping report during the 30-day review period from all I&APs, including Organs of State, have been recorded, included and addressed as part of the final Scoping report. Proof of all correspondence undertaken to date with the various I&APs (including the key stakeholders) is included in Appendix C of</p>

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	<p>abovementioned application:</p> <ol style="list-style-type: none"> i. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 43 and 44 of the EIA Regulations 2014, as amended. ii. You are further reminded that the Final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations, 2014, as amended. iii. Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7). <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>	<p>CIPS & s24G</p> <p>National Department of environmental Affairs</p> <p>Letter: 27-03-2018</p>	<p>the final Scoping report. Proof of attempts to obtain comment from the various I&APs is included in Appendix C. The public participation process undertaken for the Boulders Wind Farm will meet the requirements as outlined in Chapter 6, Regulations 39, 40, 41, 43 and 44 of the EIA Regulations, 2014, as amended. All written comments received have been consolidated in a Comments and Response Report (refer to Appendix C8), and all notes for the record from verbal comments and meetings have been included in Appendix C7.</p> <ol style="list-style-type: none"> ii. The Final Scoping report for submission to the DEA will comply with all the requirements for the undertaking of a Scoping report, as per Appendix 2 and Regulation 21(1) of the EIA Regulations, 2014, as amended. iii. It is noted that the application for Environmental Authorisation will lapse should the prescribed timeframes not be met. The final Scoping report has been submitted to DEA within 44 days of the submission of the application to the Department. <p>It is noted that no activity may commence without an Environmental Authorisation being granted by the DEA.</p>
50.	<p>This letter under the name of Aksie Paternoster Action was sent to 127 rate payers in Paternoster through a MailChimp campaign email with a total of 92 replies (all but 4, supporting the following comments) – please see email addresses attached.</p>	<p>Alvin Roon Interested and Affected Party Roon Architects</p>	<p>It is noted that the comment is a consolidated response from Paternoster rate payers to a petition campaign launched by Alvin Roon, a resident and business owner based in Paternoster. The details of the 92 respondents referred, who Alvin Roon represents with this submission, are not provided and therefore not captured</p>

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	<p>Sustainable energy sources must be provided, but not at our expense!</p> <p>Wind turbines change the silhouette of the environment and have an adverse impact on the attractive appearance of Paternoster seen as the fisherman's village and very good tourist destination, in an intact natural/rural environment.</p> <ul style="list-style-type: none"> » Where the Vredenburg turbines are approximately 150m high, the Boulders proposal is for even 15m higher turbines. » The most disturbing effect is the white flashing lights during the day and red at night, - completely as if you were heading down the main street in Johannesburg instead of walking along a wide open beach. » The proposed 45 turbines, in addition to the Vredenburg Wind Farm, create the effect of a forest of moving structures with a height higher than all buildings in Cape Town. Due to the developer not showing this we have superimposed the turbines on a photograph as indicated below. <div data-bbox="159 894 858 1200" style="border: 1px solid black; height: 188px; width: 333px; margin: 10px 0;"></div> <p>Letters attached to the report supporting the Boulders Wind Farm were from:</p> <p>Saldanha Bay Municipality, Geldenhuys Jonker Attorneys in</p>	<p>Letter: 28-03-2018</p>	<p>as part of the public participation process. This detail has been requested from the I&AP.</p> <p>All the detail and information contained in this comment will be referred to the relevant specialists for their consideration in the EIA Phase.</p> <ul style="list-style-type: none"> » As part of the Scoping phase visual and social scoping studies have been undertaken to identify the potential impacts on the visual and social characteristics of the area. These potential impacts will be assessed further as part of the EIA phase impact assessments. The Visual Scoping Study (Appendix L) has identified the impact of the lighting of the wind farm, which will be further considered and assessed during the EIA phase. » It must be noted that the visual simulation provided by the I&AP is misleading in that it does not consider the location of the preferred development area within the project site as per the sensitivity analysis undertaken. The location of the turbines included in the simulation has been placed within the area identified as less favourable for the development of a wind farm. This area is not being considered as part of the design of the facility layout. No visual simulations form part of the Scoping report as a layout is not yet determined. This will form part of the EIA Phase. » It was confirmed by the Saldanha Bay Local Municipality, during a focus group meeting held on 08 March 2018 that a scenic routes proposal has been adopted by the Local Municipality council. This has, however, not been taken forward. And no formal scenic routes are located within the project site or the adjacent surrounding areas.

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	<p>Vredenburg (vested interested), Uitkoms boerdery (stand to profit from the development), Cape Chamber of Commerce in Cape Town, City of Cape Town (why not install these turbines in Bantry Bay?) and Ryno Summers (in Kliprug Paternoster).</p> <p>This is a far cry from what the reality is as per attached supportive list of emails illustrates.</p>  <p>Green indicates the area available for turbines and grey the existing Vredenburg Wind Farm.</p> <ul style="list-style-type: none"> » The R399 road towards Paternoster is regarded a scenic route and as such may not be spoiled by the Boulders project. » The proposed development is partially within the protected area of Kasteelberg (Klein & Cruz-Urbe 1989; Smith et al 1991). There is to be no development/ change to this Heritage area within a 2km radius. In addition the WITS School of Archaeology refers to a total height of the turbines not to exceed 80m from sea level to ensure that nothing is erected above the Kasteelberg heritage site. Compare this to 165 on top of a say 40m ground level - more than twice as high. 		<ul style="list-style-type: none"> » The Kasteelberg heritage features is located outside of the project site. The Archaeological Scoping Study has recommended, in consultation with Heritage Western Cape that a 2km buffer needs to be applied on the western side of the feature and a 1.5km buffer on the eastern side for the protection of the feature. The buffer areas are considered to be no-go to the development of the wind farm. » A Traffic Impact Assessment will be undertaken during the EIA phase to assess the impact of the development on the roads network within the project site and surrounding area. » The impact of the influx of jobseekers has been identified by the Social Scoping Study (Appendix J) as a potential impact. The impact will be further assessed and ground-truthed during the EIA phase as part of the Social Impact Assessment. » It must be noted that the developer intends on making employment opportunities available to the local residents within the surrounding areas of the project site. The developer will not procure employment from Germany. No response can be provided regarding the employment opportunities provided during the construction and operation of the West Coast One Wind Energy Facility as the developer has no link to the existing project. » A Visual Scoping Study (Appendix L) and a Social Scoping Study (Appendix J) has been undertaken to identify the potential impacts of the development from a visual perspective as well as the impact on tourism. These impacts will be ground-truthed and assessed further during the EIA phase. The Social Impact Assessment will also consider the

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	<ul style="list-style-type: none"> » The erection of the turbines over a period of 2 years has a negative impact on the small roads network of the environment. » The influx of job seekers will be more negative than those who might be given jobs during the 2 year construction phase. » Comments regarding work opportunities, creation of job opportunities and skills development, are completely unfounded. Exactly the opposite is true we will be financing jobs in Germany. We have already had similar promises from the Vredenburg Wind Farm without anything materializing (except one contractor appointed to erect not much more than a few carports at a site office). Nobody from Paternoster has been employed. » The negative visual effect, without a doubt, will result in a decline in tourism. » Serious concerns exist about the noise and health impact studies referred to in this report. Since turbine positions have not been determined and distances cannot be measured, the effect can also not be commented on. Although reference is made to low negative significance to health, why should we have to accept ANY negative impact? » It is essential that the stroboscopic effect of the turbines is demonstrated to people who might be living in close vicinity. » People become aware of noise as soon as there is 3– 5 dBA above the ambient noise. The report shows that the minimum effect will be more than 7dBA above ambient noise. Although distance plays a major role low frequencies (of the turbines) travel far. » The report refers to the increase in property values over a 10-year period, but simultaneously accepts that they can only determine this effect from Phase 2 of the EIA process. Whatever the outcome of such study might be, in our opinion the Wind Farm cannot have a positive effect on property 		<p>findings of the Visual Impact Assessment.</p> <ul style="list-style-type: none"> » The noise impacts and impacts on health will be further assessed and ground-truthed as part of the EIA phase Noise Impact Assessment and Social Impact Assessment. A layout of the wind turbines will be provided as part of the EIA report for review and comment. » The stroboscopic effect will be considered by the visual specialist as part of the EIA phase Visual Impact Assessment. » The Noise impact Assessment to be undertaken in the EIA phase will consider the distance over which low frequency noise can travel. » It is noted that the I&AP believes that there is no positive status linked to the impact on property values. » The subdivision of the properties location within the project site cannot be commented on. » The concern regarding local content is noted. » IPD Power (Davertwind) is no longer a shareholder of the windfarm. » It must be noted that the wind farm being referred to in the comment is the West Coast One Wind Energy Facility. The sensitivity analysis undertaken as part of the Scoping report has identified the area with the highest potential for development to be the southern section of the project site, which is closer to the West Coast One Wind Energy Facility.

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	<p>values.</p> <ul style="list-style-type: none"> » Diagrams in the report also indicate the majority of property owners being Sectional Schemes with only 30 vacant properties in Paternoster? This should be explained in detail if it is used in any calculations. » The Developer argues that 50% of the manufacturing will have local content. Does this mean in weight in Kg or intellectual value? It is clear that the blades, hub, nacelle and tower are manufactured in Germany (not local), the machinery will be coming from Germany as well (not local), maintenance will be supported from Germany at enormous costs (not local) – It seems we are left with local content being concrete, with 'skills development' in pouring concrete. This is going to be just great!!!!!!! » The Developer argues that 50% of Company ownership is local, but even this 50% local (IDP Power) is owned by majority (Davertwind) German shareholding. » The report refers to a financial impact comparison before and after the completion of the Vredenburg Wind Farm. This is a futile exercise because the Vredenburg Wind Farm is situated largely 'behind' Paternoster, whereas this proposal is in our face. » The developer refers to two case studies for a comparison before and after the establishment of a wind farm in South Africa? Should we not rather insist on a study why European countries have stopped erecting turbines? » Many problems exist with the quality of the internet due to interference from the turbines. Does the developer have a study available which we can check? » When the report refers to decommissioning and rehabilitation after say 20 years, does that include the 300m³ concrete footing of each and every turbine? » The 1200 m² platform at each turbine along with the network of 		<ul style="list-style-type: none"> » As South Africa still considers wind energy as part of the energy mix, as required by the Integrated resources plan, and will therefore continue the development and use of wind energy facilities within the country. Therefore, there is no relevance to consider the current situation in Europe. » The impact of the development of the Boulders Wind Farm on the internet in the area is not being considered as part of the EIA process due to the fact that it is not an environmental issue and the service provider of the internet should rather be consulted by the I&AP. » The decommissioning of the Boulders Wind Farm will be undertaken in line with the legal requirements at the time. » It must be noted that the platform for each turbine will be 380m² and not 1200 m². Specific areas considered to be no-go areas to the development have been identified by the specialists. With the avoidance of these sensitive areas, the impact is considered to be acceptable. » It is noted that there may no longer be a need for crop spraying by the affected landowners once the facility is operational. It must also be noted that it is the intention of the affected landowners to continue with their farming practises once the wind farm has been established. » The use of light aircrafts and microlights within the area is noted. The Boulders Wind Farm will be developed in line with the Civil Aviation Authority requirements. » The design of the facility development footprint within the preferred development area will be in line with and avoid the

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	<p>roads to all turbines have a negative impact on the landscape.</p> <ul style="list-style-type: none"> » Although farmers (on whose land wind turbines will be built) suddenly no longer seem to have a need for crop spraying by planes adjacent farmers still might regard this as essential. » Light aircraft and microlights use the area frequently for recreation and will negatively be influenced by the turbines. » The developer's bird studies refer to NO-GO areas e.g. water ways and beacon points (for hunting, feeding or nesting grounds, shown in brown below). Will the Developer give directions to birds and bats to remain in the brown demarcated areas? 		<p>no-go areas as identified by the avifauna specialist. The Avifauna Impact Assessment will also consider and assess the layout as part of the EIA phase.</p> <ul style="list-style-type: none"> » The aim of the EIA process is to identify and assess impacts resulting from the development of the wind farm. With the design of the facility layout the developer will avoid the no-go areas located within the project site in order to ensure that the project is in line with the recommendations of the specialists. No promises or guarantees have been or can be made at this point in the process regarding the Community Trust due to the fact that the project still needs to receive Environmental Authorisation from the National Department of Environmental Affairs (DEA) and be granted preferred bidder status from the Department of Energy in order to construct the project.
	<ul style="list-style-type: none"> » What sort of carrot to the Community Trust does the Developer offer, enough to offset the irreparable damage this development will do to our area? » There is a perception that public participation is used only to meet legislative requirements. Although registered as an Interested and affected Party (IA&P) the Developer neglected to inform many people so registered. Along with the Department of Environmental Affairs the public participation process is only used to demonstrate due diligence without giving enough attention to valid objections/comments. » The trust to which the developer from the beginning deposits enough money for the removal of the turbines, should include removal of platforms, roads, 300 to 700 tons concrete foundations, and rehabilitation of the environment. » Rate payers would like to have insight in how restrictions are enforced. It is important that a method be implemented 		<ul style="list-style-type: none"> » The public participation process undertaken as part of the project is a transparent process which allows the I&APs to provide comment and also provides the DEA with the necessary information to make an informed decision on the application. It must be noted that notification of the EIA process was undertaken within the area which included advertisements (printed and radio), notification letters and site notices. I&APs that want to be registered as part of the project database need to register their interest with the consultant. » The decommissioning of the wind farm will be undertaken in accordance with the legislative requirements at the time. » It must be noted that the comments received from Britannica Heights were already taken into consideration through the identification of the preferred development area. All written comments received from residents have been included in this

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	<p>whereby residents can see how all objections or concerns are addressed.</p> <ul style="list-style-type: none"> » Methods must be established to monitor the destruction of the little endemic vegetation still left, with a heavy fine if the developer would error. » The fact that wind conditions are less favourable during winter (when demand is the highest) means that Eskom still must provide for maximum demand. This then must be done by a more reliable source. If this is provided by a reliable source (eg nuclear) then the wind farm becomes obsolete again? » Gas generated electricity, is a power source that could be used in conjunction with solar and wind (due to this being able to switch on and off when not enough power is generated by the wind farms). » This will probably not be implemented due to high costs. » There does not seem to be an objective approach to e.g. the pebble bed reactor which at least can ensure a reliable power supply, is safe and has far less impact on the environment. » It is incomprehensible why the State does not have a coordinated plan for electricity generation with all available technologies (solar/ wind/ coal/ hydro-logic/ gas etc) demarcating the whole country into preferred applications taking into account all ecological-, social- and economical aspects. » Without doubt individual agricultural landowners will financially benefit from the proposed wind farm, but all ratepayers/ village property owners will be seriously harmed financially. There is as yet no study presented of similar cases and what the short and long term effect has been. » Another aesthetically negative impact is caused by the erection of power lines. It should be a requirement that no new power distribution from a wind farm may be erected above ground. 		<p>comments and responses report and responded to accordingly. The notes of the focus group meetings held during the 30-day review period of the Scoping report are included in Appendix C.</p> <ul style="list-style-type: none"> » All areas with intact natural vegetation within the project site have been identified as no-go areas by the ecology specialist and as part of the Ecological Scoping Study (Appendix D). The areas containing natural vegetation will be avoided by the development footprint. The construction phase will be monitored by an on-site independent Environmental Control Officer (ECO). » The project site is currently being monitored by two wind monitoring masts to confirm the on-site wind resource. Wind monitoring has been taking place on the project site since 2011 using 85m and 120m wind monitoring masts to confirm the wind resource and regime and inform the turbine selection process. High wind resources, which are considered to be an excellent resource for wind farm development, have been confirmed with certainty, with the mean annual wind speeds exceeding 8m/s at 120m above ground level. Considering the wind monitoring data collected by the developer, the project site is considered to have a reliable wind resource (even in the winter season). » The use of gas as a fuel for the generation of electricity is not considered as part of this EIA process due to the reliable wind resource available within the project site. » The wind resource at the project site has been confirmed to be reliable by the collection of wind data since 2011. No nuclear initiatives are being considered.

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	<p>» Boulders' ideal location, due to lowest cost (close to electrical- and road infrastructure and nearby harbour), certainly is very profitable for the developer. We as SA taxpayers were instrumental in this infrastructure which the German developer now hopes to profit from.</p> <p>Big coal power stations with new emission technology have and are going to come on line with approximately 18 months intervals - Medupi with 6x800 MW (is working), Kusile with 6x800 MW and Ingula with 1330 MW (under construction). This already pushes up the electricity supply with 50 000 MW. Our economy has grown far less than 5% which reduces our demand for power drastically. Sustainable energy generation is definitely part of the solution to our electricity supply. However, this may not be to the detriment of all those people who have invested in this very successful village.</p> <p>Only German companies, a few farm property owners and a few South African individuals (who do not live in Paternoster) will benefit from this venture.</p> <p>There is absolutely no reason why anyone in Paternoster should support the intended Boulders Wind Farm- in fact we only stand to lose!</p>		<p>» The Government has created Renewable Energy Development Zones (REDZ) which are focus areas for the development of renewable energy projects that have been considered from an environmental and technical perspective. However, developers are not limited to develop energy facilities within the REDZ only.</p> <p>» There is no evidence at this stage of the EIA process that the ratepayers and property owners will be financially affected by the development. The impact on the economy and the property values will be assessed as part of the Social Impact Assessment to be undertaken in the EIA phase.</p> <p>» It is noted that it is desired that no new power line must be constructed above ground. The internal cabling within the facility can be underground. The connection to the grid must be built as an overhead line due to Eskom's requirements.</p> <p>» Comment noted, no response required.</p> <p>The objection to the Boulders Wind Farm is noted, however it must also be noted that comments received on the project are not only objections but also include support for the development.</p>
51.	<p>CapeNature would like to thank you for the opportunity to comment on this application and wish to make the following comments:</p> <p>1. Historically, most of the site was covered by Saldanha Granite Strandveld, with Saldanha Flats Strandveld occurring to the east. Saldanha Limestone Strandveld may also occur on the site. Although agricultural activities have transformed large</p>	<p>Alana Duffell- Canham Scientific Services</p> <p>CapeNature</p> <p>Letter: 29-03-2018</p>	<p>CapeNature are a commenting authority on this application.</p> <p>1. The Ecological Scoping Study (Appendix D) has identified the areas of intact natural vegetation to be no-go areas to the development of the wind farm. The development footprint will be designed in such a manner to ensure that the no-go areas in the project site is avoided. The approach undertaken for the assessment of the wind farm is therefore in line with this</p>

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	<p>portions of most of the site there are some remaining remnants of natural vegetation. All remaining areas of natural vegetation have been determined as Critical Biodiversity Areas (CBAs) due to the presence of endangered vegetation, the presence of rare and endangered plant species and special habitats. No turbines, powerlines or roads should be located within CBAs.</p> <p>2. On page 104 of the report it states that the entire project area of 5084ha will be experience disturbance. Please clarify this statement.</p> <p>3. All access roads including bridges and other water crossings must be determined and assessed as part of this process. It would also be desirable to indicate the possible alternative routes for the powerline even if this will still need to undergo a separate authorisation process.</p> <p>4. With regard to impacts on vegetation and freshwater features we are satisfied with the areas that have been scoped out. However, certain linear activities may not be able to avoid these areas and this must be clearly indicated and assessed. Also refer to point 3 above related to crossing structures.</p> <p>5. We note that the current proposal is for up to 45 turbines plus associated infrastructure such as roads, cables, power lines, substation etc. The potential impacts on birds remains of high concern especially when considered cumulatively. An additional 45 turbines will provide a significant barrier to both bird and bat movement across the West Coast peninsula which lies between two Important Bird Areas (IBAs). The adjacent West Coast One Facility is causing bird mortalities. The avifaunal scoping report has made no reference to data</p>		<p>comment.</p> <p>2. The statement referred to in the comment relates to the fact that during the construction, a development footprint within the project site of approximately 5084 ha will experience some level of disturbance. The statement relates to the smaller development footprint of 55ha and not the entire project site 5084ha.</p> <p>3. The facility layout to be assessed in the EIA phase will include the access roads and watercourse crossings which will also be considered by the relevant specialists. The assessment of the power line will be undertaken as part of a separate Basic Assessment process, and the alternatives can therefore not be included as part of this EIA process.</p> <p>4. It is noted that CapeNature is satisfied with the sensitive areas identified in terms of vegetation and freshwater features. The facility layout designed by the developer will be assessed by the ecological and freshwater specialists, and attention to the crossing of the sensitive features will be given,</p> <p>5. The Avifaunal and Bats Impact Assessments (to be undertaken in the EIA phase) will consider post-construction monitoring results of the existing West Coast One Wind Energy Facility, where these are available, to provide a more accurate impact assessment of the impacts expected to occur. The layout of the facility will also be assessed by the specialists during the EIA phase.</p> <p>6. It is noted that all monitoring going forward for the Boulders Wind Farm must be undertaken in accordance with the latest</p>

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	<p>from West Coast One and has mainly used the pre-construction monitoring data collected a few years ago. It should be noted that the expected impacts based on the pre-construction data for West Coast One have been quite different to the actual impacts recorded post-construction. It is essential that the data from West Coast One be used to inform the potential impacts on birds and bats for this facility. Consideration must be given to layout, reducing the number of turbines and the no-go alternative.</p> <p>6. All monitoring going forward must be in line with the latest Best Practice Guidelines developed by BirdLife and EWT.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>		<p>Best Practice Guidelines developed by BirdLife and EWT.</p>
52.	<p>Further to your notification of the availability of the Scoping Report of the above application, I would like to submit the following comments for your records:</p> <p>1) I object to this application as it is directly in front of our property and will impact negatively on the sense of place of our area and our quality of life.</p> <p>2) In terms of scoping the EIA process, although the following are included in the Scoping Report, I would like to reiterate their importance that they be fully and properly investigated and reported on during the impact process:</p> <ul style="list-style-type: none"> • I am concerned that the Boulders WEF will visually intrude on the views that we enjoy from our property on Britannica Heights. <p>Britannica Heights is a residential suburb of St Helena Bay that sits on top of the escarpment overlooking the proposed Boulders WEF.</p>	<p>Doug and Gaynor Portsmouth Adjacent Landowners</p> <p>ERF 1789 Britannica Heights</p> <p>Letter: 28-03-2018</p>	<p>The I&AP is a resident of Britannica Heights.</p> <p>1) The objection from the I&AP is noted, as well as the stated reasons.</p> <p>2) The sensitivity analysis undertaken as part of the Scoping report has considered the visual impact on the Britannica Heights residents and has identified the northern section of the project site as less favourable for the development. The developer's focus is to place the development footprint within the area with the highest potential for development, which is the southern section of the project site (refer to Figure 7.19). The Visual Impact Assessment, to be undertaken during the EIA phase will include photo simulations in order to provide a better understanding of how the facility will look once constructed.</p>

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	<p>The West Coast One WEF is partially intrusive to our views, but fortunately it is situated out of the direct view down the valley to Paternoster. This WEF provides us with a direct visual reference to be able to state that the Boulders WEF must not be allowed to encroach beyond the line of sight between us and West Coast One WEF.</p> <p>It is of paramount importance that a thorough investigation by the Visual Impact Specialist includes the superimposition of the Boulders WEF turbines onto photographs. I request that such photographs are taken specifically from our properties so that the results are as realistic as possible.</p> <ul style="list-style-type: none"> I am concerned that the siting of wind turbines in front of/adjacent to our property will have a severe impact on the value of our property. <p>I request that the Economic Scoping Report includes a thorough investigation of the negative economic impact on the property values in our location and where there is a deficit in value, what mechanism the developer can utilise to compensate for this deficit.</p> <ul style="list-style-type: none"> I am concerned that the Boulders WEF will negatively affect the tourism appeal of Britannica Heights. <p>Employment opportunities in our location are very limited. Fortunately, the views from our location, coupled with the distinctly rural Sense of Place lend themselves to tourism.</p>		<p>As per the response above, the preferred development area is not located directly adjacent to Britannica Heights. The impact on property values and tourism will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of property and tourism trends and values within the area.</p> <p>The potential impacts of the wind farm on birds has been identified in the Scoping report (Appendix F), 12-month monitoring programmes have been undertaken in line with BirdLife South Africa's Best Practice Guidelines, and will be further assessed during the EIA phase.</p> <p>3) The response provided in number 1 above has reference. It must also be noted that the preferred development footprint is located closer to the West Coast One Wind Energy Facility.</p> <p>The EIA phase and report (including the specialist studies) will assess the cumulative impact of the Boulders Wind Farm, specifically considering the existing West Coast One Wind Energy Facility.</p>

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	<p>A growing proportion of residents of Britannica Heights are engaged in tourism-related activities and we are currently investing in adapting our property to start a tourism business.</p> <p>I request that the Scoping Report ensures that a full investigation of the economic impact to tourism on our location is carried out.</p> <ul style="list-style-type: none"> I am concerned that the proposed Boulders WEF will have a negative impact on our bird population. In particular, I am aware of a colony of Blue Cranes sited somewhere below our ERF on the Bester Farm; plus, we often sight various raptors, including one Verreaux's eagle. <p>I request that the Scoping Report ensures that a full investigation of the impact on the avifauna in our location is carried out – particularly with regard to any endangered species.</p> <p>3) My final comment concerns the West Coast One WEF, which we can see quite clearly from our property. The location of this WEF is in the direction of Vredenburg and far enough away from our view line to Paternoster so as to be partially intrusive.</p> <p>In short, we have learned to live with this development (even having a skyline full of blinking red lights at night). It should be noted that this development was approved with no genuine consultation with or knowledge of the residents of Britannica Heights.</p>		

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	<p>It is in my view, false thinking of future developers, to assume that if we can learn to live with one WEF, then we can learn to live with more and more. The cumulative effect of adding to the West Coast One WEF is unacceptable and any plans to do so must be rejected.</p> <p>I hope that my concerns and reasoning are adequate for your needs. Should you require clarification of any point or additional information, please do not hesitate to contact me.</p>		
53.	<p>Further to our previous comments, on reading the comments by Mr P Pickford and Mrs B Pickford we wholeheartedly agree with all their comments. He can obviously put into word what many of us feel.</p> <p>As mentioned in our previous comments, a project manager for windfarm construction stated 'once the land owners and the developers had come to an agreement, the local resident have no say, even though they are given the opportunity to comment – these comments are a waste of their time'. As Mr Pickford states, the local community has a 'sincere distrust' of all these processes as they feel their concerns are not taken into account, but only the developers interests. As far as we are aware no local residents know why the previous application was withdrawn and none received any response to their comments besides "This serves to acknowledge receipt of your comments, thank you." Which is the same response received to current comments – no queries/questions are answered. It appears that this new application has been made in the hope that local communities have been harassed and worn down enough and will just give in.</p> <p>As Mr Pickford states the first most residents knew of WCOEF was</p>	<p>Anne and John Todd Interested and Affected Party Britannica Heights Residents Letter: 30-03-2018</p>	<p>It is noted that the I&APs are residents of Britannica Heights.</p> <p>Refer to comment numbers 45 and 46 for the comments submitted by Mr P Pickford and Mrs B Pickford, as well as the responses. Refer to comment number 31 for the previous comments submitted by Mr and Mrs Todd, as well as the responses.</p> <p>Savannah Environmental notes that the lapsing of the previous process was not adequately communicated to I&APs. This application for authorisation is a new application made in line with the EIA Regulations of 2014. All written comment received on the Boulders Wind Farm EIA process has been included and responded to in this comments and responses report.</p> <p>It must be noted that, due to the Boulders Wind Farm being undertaken under a new application for Environmental Authorisation and the fact that the I&AP is not a directly adjacent landowner, it was required of the I&AP to re-register their interest on the project database.</p> <p>The public participation process undertaken by Savannah Environmental is in-line with the requirements of the EIA Regulations,</p>

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	<p>when they saw construction starting to take place. Surely all within the area of sight of the turbines should be consulted. Were all who registered for the Terramanzi EIA contacted and notified that this new application was in progress? We were not. Their contact details are surely available, and as Mr Pickford states all comments submitted for that application should automatically be brought into the comments for the current application. For the previous application Terramanzi hand delivered notification to all who might be affected, but with this application we heard by word of mouth. It appears that those entrusted with providing the EIA for BEF do the minimum necessary to satisfy the DEA, one small notice in a newspaper and a few notices on fences, which soon get destroyed by wind and sun, is hardly enough to advise residents of the proposed project. Surely all residents in Paternoster, St Helena Bay and surrounds should receive personal notification, (are their contact details not available from SBM?) or would this require too much effort and cause more negative reaction to have to deal with. It appears the main objective is to engage the local communities as little as possible and keep them in the dark. As far as we are aware there has been only one meeting for St Helena Bay / Britannica Heights residents, and this was requested to be restricted to ten people, hardly gives one the impression that the process is transparent.</p> <p>When reading the various sections of the scoping report, it appears that only data which is beneficial to the developers and the project is included and any which might cause the application to be rejected is carefully avoided.</p> <p>Does the application not require the developer to consider and supply the position of other possible sites? Has the developer of BEF done this? From reading Mr Pickfords's comments, apparently not.</p>		<p>2014, as amended. It must be noted that further notification of the project was placed at the Paternoster, St Helena Bay and Vredenburg Public Libraries. It must be noted that I&APs which are not directly affected or located directly adjacent to the project site must register themselves as part of the project database, as per the EIA Regulations, 2014, as amended.</p> <p>The meetings held during the Scoping phase review period were focus group meetings focussed on specific key stakeholder groups located within the area. It must also be noted that focus group meetings were also held in March 2018 with the Paternoster fishing community representatives and the St. Helena Bay community. It must be noted that there was no restriction placed on the meeting held with the Britannica Heights residents on 07 March 2018, the focus of the meeting was however to engage with the directly adjacent landowners located within Britannica Heights. Should an I&AP feel a meeting necessary, they are fully entitled to request such a meeting with the public participation consultant.</p> <p>It must be noted that the data included as part of the Scoping report has been sourced from the various specialist reports and maps, and well as South African legislation and policies which is relevant to the development of the Boulders Wind Farm.</p> <p>The consideration of site alternatives was undertaken as part of the site selection process undertaken by the developer in 2010 (refer to Appendix O). As the site selection process the project site as being preferred for the development from a technical perspective no other sites are considered as part of the EIA process.</p> <p>All comments received from I&APs, including the local communities, have been included in the Appendix C and this</p>

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	<p>Once more, how many local people are employed by WCOEF and how many will be employed by Boulders EF, or will the same employees be used for both? What benefits are associated with the Community Trust created by WCOEF, how many jobs were created, what employment, education and business opportunities, what skills development and training? We would appreciate replies to all the questions posed in our comments.</p> <p>We note that in all the support statements by: Western Cape Government Saldanha Bay Munic. The Farmers Cape Chamber of Commerce City of Cape Town</p> <p>None give any reference to local residents, so we can guess how much notice will be given to comments by these residents. Also the only attention given to an apparent local resident is to the support of Mr Ryno Summers of Paternoster who will no doubt not overlook the site. Not one mention of any who oppose the BEF.</p> <p>We also cannot find some of the comments by I&AP (Our comments of 19 March 2018), are these all in appendix C8 and how often are these updated?</p> <p>Does this not indicate bias by the organisations tasked with producing the EIA?</p>		<p>comments and responses report. It must be noted that all comments of objection and support have been recorded and included as part of the final Scoping report.</p> <p>It must be noted that the comments sent by the I&AP was submitted to Savannah Environmental on 19 March 2018, during the Scoping report review period. Therefore, the comment would not have been included in the Scoping report made available for review, but will only be included in the final Scoping report submitted to DEA. All comments submitted during the review period are collated into the comments and response report included in Appendix C8.</p>
54.	<p>I registered as an IAP but to my dismay I am now informed by people in this area that the closing date for comments on the proposed Boulders Windfarm closes on 3 April 2018.</p>	<p>Stefan Mare Interested and Affected Party</p>	<p>Interested and Affected Parties were required to register themselves for the EIA process for the Boulders Wind Farm since a new process was being undertaken. Mr Mare has, following this submission, been registered as an I&AP on the project database.</p>

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	<p>I have not received any of the scoping documents and therefore cannot comment on them. However, as the size and position of the Boulders Windfarm seems to be virtually identical to the previous Terramanzi Project No 150302, I include my comments on that proposal as I consider them to be still applicable.</p> <p>I further wish to state that I am in agreement with the comments made by Mr Peter Pickford and Ms Beverly Pickford in response to your request for comments.</p> <p>In addition to the comments below I would like to say that after a recent visit to a number of countries in Europe and Britain I was impressed by the way that they have gone about placing their windfarms. The most obvious difference to the South African approach is that the largest windfarm that we saw consisted of 12 wind powered generators. Most facilities had fewer than this. This makes the visual impact bearable.</p> <p>In the case of the proposed wind farms in the Vredenburg area the scale is massive. The existing Wind Farm 1 facility has more than 40 towers. The previous Terramanzi proposal wanted to add another 47 towers, and your proposal is of the same scale, together with Wind Farm 1, this places more than 90 wind turbines in this area. All of these towers are within the visual aspect of certain places, to name two places: Paternoster and Britannica Heights (St Helena Bay). There are many alternative places to site any new WEF development.</p> <p>TERRAMANZI PROJECT No. 150302 VREDENBURG WINDFARM (PTY) LTD SCOPING REPORT FOR COMMENT</p>	<p>Letter: 31-03-2018</p>	<p>The I&AP comments were received within the review period and included in the Comments and Response report.</p> <p>It must be noted that the Scoping report was made available for review in the Vredenburg, St Helena and Paternoster Public Libraries, as well as on the Savannah Environmental website (www.savannahSA.com). Notification of the availability of the Scoping report was placed in both the Weslander and Die Bruger on 01 March 2018 in both English and Afrikaans. It must also be noted that a radio advert was aired on Radio Weskus 92.3 FM to inform the broader area of the availability of the Scoping report. The advert was aired in English on Thursday 22 March 2018 between 06:00 and 09:00 am and in Afrikaans on Saturday 31 March 2018 between 09:00 am and 12:00 pm.</p> <p>The comments submitted as part of the previous process are noted. The comments relate to: tourism, employment creation, need and desirability, visual, and land use. However, due to the fact that the Boulders Wind Farm is being undertaken under a new application for Environmental Authorisation and the fact that there has been a change in the project details and process approach these comments on the previous Scoping report are not automatically considered as a submission of this new process. Comments specific to the Scoping report for the Boulders Wind farm application are welcome to be submitted to the public participation consultant.</p> <p>It must be noted that Mr. Pickford's comments have been included as comment number 46 of this comments and responses report.</p> <p>It is noted that the I&AP considers wind energy facilities with fewer turbines to be more acceptable from a visual perspective.</p>

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	<p>Comments by: Stefan Maré, Ronél Maré and Alexander Maré (Registered IAPs) 28 May 2016</p> <p>Page numbers noted in these comments refer to pages in the Vredenburg WEF Scoping Report unless otherwise stated. Where parts of the Scoping Report for Comment have been copied into this document, sections have been highlighted in bold by the authors of these comments.</p> <p>Introductory Remarks</p> <p>Alternative energy sources are to be encouraged considering the threat of global warming. Care must however be taken in considering the benefits and negative effects on the communities where these energy generating systems are located.</p> <p>The economic benefit vs. social cost of the particular technological choice, wind energy, must also be considered. Long term average efficiency of WEFs is of the order of 35%, i.e. a 140 MW facility will deliver about 50 MW on average. The times when maximum output is available cannot be chosen. In the Vredenburg area the winter months are the wind quiet periods.</p> <p>People live in a particular area for a number of reasons, work opportunities, community involvement and sense of place being some of the most important. The Cape West Coast is an area with a particular ambience, close knit communities, great scenic beauty of a kind not found elsewhere in South Africa and even in the world. Over time this has changed and with the industrial development in the Saldanha Bay area, a part of the West Coast has changed forever. This need not be the case for adjacent areas like Paternoster, Jacobsbaai, Cape St Martin, St Helena Bay etc.</p>		<p>The concern regarding the number of wind turbines within the Vredenburg area is noted. The potential visual impact on the towns of the area has been identified in the Visual Scoping Study (Appendix L), and will be further assessed as part of the EIA phase Visual Impact Assessment.</p> <p>As part of the project the developer has undertaken a site selection process in order to identify a project site that is both technically and environmentally suitable. The site selection process was undertaken in 2010 and a report regarding the findings of the site selection process has been included as part of Appendix O. Therefore, the site selection process has lead the developer to identify a feasible project site within the Saldanha area for the development of a wind farm.</p>

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	<p>The central question to be raised with respect to the proposed Vredenburg WEF (it should be named the Paternoster WEF since Paternoster will be the most affected village) is: Why choose this area over areas where the impact will be much lower?</p> <p>On starting to read the report one is immediately confronted by Figure 2, a map of the proposed site for the WEF. This map is coloured red, yellow and green indicating No go, not preferred and preferred areas for siting the wind turbines. Most of the area is coloured red or yellow, the turbines are placed on slivers of green in an area, the majority of which is red, i.e. No go.</p> <p>Looking at this map your first impression is "Why even consider this area?"</p> <p>Question1: Which alternative sites have been considered and on what basis was this particular site chosen? A: Comments on Appendix D Socio-economic Scoping Report A1: TOURISM</p> <p>Reading the extracts from the Scoping Report (see below) it is clear that both the Western Cape Government and the Saldanha Bay Municipality place great emphasis on the importance of the tourism industry as a generator of economic activity and job creation. The recently published SBM Draft Tourism Strategy 2016 – 2021 section 3.2 Tourism Strategy Rationale, Opportunities & Challenges states:</p> <p>The following aspects form the rationale for the tourism strategy:</p> <ul style="list-style-type: none"> » The socio-economic benefits for tourism to an area such as Saldanha Bay; » The growing tourism industry offers economic 		

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	<p>development potential to a large part of the community and potential for a year round flow of tourists;</p> <ul style="list-style-type: none"> » The current industrial activities (IDZ) will create spin offs for tourism; » The conservation of the important elements of the natural environment setting are critical to the future economic/tourism well-being; and » The legislative obligation on municipalities in terms of the tourism function. <p>In addition consideration must be given to the SBM By-law on Municipal Land Use Planning (2015): Other restrictions in terms of the Saldanha Bay Municipality: By-Law on Municipal Planning (2015) (as quoted in section 3.3 of the Scoping Report page 31) which states:</p> <ul style="list-style-type: none"> » 30 m building line with adjacent neighbour's consent. » Mineral right holder's consent. » No visual impact from Paternoster. <p>A quick ruler and pencil exercise will show that the majority, if not all, the wind turbine towers will be clearly visible from Paternoster. In addition all the towers will be visible from Britannica Heights, and some will be visible from Shelley Point (another tourism hotspot).</p> <p>On page 34 of the Scoping Report the villages of Duiker Eiland, Britannia Bay (not included), the Golden Mile, Shelley Point (not included) Stompneus Village, St Helena, Britannica Heights smallholdings (not included), Sandy Point and Paternoster are referred to as 'fishing villages'. This is not entirely correct. Many of the inhabitants of these villages have but a tenuous link to fishing, except maybe as fishing tourists who visit during the crayfish and snoek seasons. Some of these villages can better be described as</p>		

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	<p>tourist and retirement villages and provide an alternative economic contribution, to fishing, to the local economy.</p> <p>Tourism is a significant contributor to the local economy and is certainly a growth area. Tourism creates jobs for local people throughout the year and these jobs will increase and will not only be for a short term, and do not have an expiry date. Along with growth in tourism goes an increase in tourism establishments (B&Bs, hotels, Guest Houses, etc). This means an increase in construction work. Question 2: Will the visual impact of the wind turbines as seen from the main tourism areas be made public in a way which is clear and unambiguous. (We would suggest photographs with the turbine towers superimposed, to scale.)</p> <p>Question 3: Have any studies been done to assess the effect that the siting of a WEF close to a tourism centre will have on tourism in that area?</p> <p>A2: EMPLOYMENT CREATION Referring to page 41, section 4.2 THE WIND TURBINE, of the Scoping Report. It is stated that: the proposed wind turbines will be designed in such a manner to operate continuously, unattended and with low maintenance for a period of approximately 20 years. Once the WEF is operating it can be monitored and controlled remotely, with a mobile team, which is utilised when needed.</p> <p>The possibility of employment creation is therefore minimal. Maintenance of the wind turbines is a specialist job and not likely to contribute to local employment.</p> <p>This is confirmed by the following (page 55 section 5.3 CONSTRUCTION PHASE ACTIVITIES OF THE WEF):</p>		

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	<p>The applicant has advised the following with regards to employment opportunities:</p> <ul style="list-style-type: none"> » Approximately 2,5 jobs per MW will be made available during construction phase » Approximately 0,3 jobs per MW will be made available during operational phase » The number of jobs, taking 140 MW as a basis for calculation, therefore amount to: » Jobs during construction: 350 » Jobs during operation: 42 <p>It is not stated how many of these jobs will be for local people.</p> <p>Question 4: Have studies been done to compare the possible loss of jobs in the tourism sector, if the WEF is sited in its present position, with the above gain in jobs should the WEF go ahead.</p> <p>Question 5: How many of the jobs during the different phases will be for local people?</p> <p>Mention is made (in the Socio-economic report page 5) of the economic benefits to be gained from the establishment of a WEF in the Vredenburg area. Such facilities have been operating for some time in Hopefield, Vredenburg and various other places in the country.</p> <p>Question 6: Have the economic benefits, to the local communities, of these WEFs been quantified in any way? If so, what are the benefits? [Read this in conjunction with Question 4]</p> <p>If there are benefits, why is the loss of these benefits during the decommissioning phase and after not rated as significant? (See page iv of the Socio-economic report)</p> <p>Comments on: Section 7.4, page 119, SITE SPECIFIC NEED AND</p>		

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	<p>DESIRABILITY MOTIVATION FOR THE VREDENBURG WEF</p> <p>No mention is made that alternative sites have been considered and compared to the proposed site. This is a cause for concern.</p> <p>Under the sub-heading; Proposed Site the following is stated: it comprises a relatively flat area close to the seashore and in most part hidden from tourism developments.</p> <p>This claim is easily shown to be less than correct. Profiles drawn from Paternoster, Cape Columbine and Shelley Point, the most popular tourist destinations, clearly indicate that almost all the wind turbines will be clearly visible from Paternoster and Cape Columbine, and that some will be visible from Shelley Point. A major landmark, Kasteelberg, visible from Paternoster, Cape Columbine, Britannica Heights, etc will be surrounded by turbine towers. This landmark is a scenic feature sited as it is in the flat coastal plain visible from Paternoster. Some of the turbine towers will be visible over the top of Kasteelberg completely spoiling the natural impact of Kasteelberg.</p> <p>From Britannica Heights all the proposed wind turbines are clearly visible. The highest point above mean sea level there is 160m. The height of the turbines, amsl, may be as much as 200m and the result will be that the flashing aviation warning lights will be very disturbing to residents of this area. The same concerns apply to Paternoster.</p> <p>B: Comments on Appendix D: VISUAL IMPACT</p> <p>St Helena Bay</p> <p>St Helena Bay is one of only three natural bays in the world where the sun can be seen to rise and set over the ocean. One viewpoint from where this can be seen is Britannica Heights smallholdings adjacent to the farm of Mr Tommy Bester. Britannica Heights overlooks the proposed WEF. All the wind turbines will be visible</p>		

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	<p>from Britannica Heights and will be in line of sight to the setting sun.</p> <p>Note that Britannica Heights smallholdings are not included under receptors and key landmarks located within the viewshed (page 23 of the Visual Impact Scoping Report) Paternoster [Quoting from Wikipedia (25/5/2016)] "Paternoster (pronounced /,pa:tɜ:r'nɒstɜ:r/) is one of the oldest fishing villages on the West Coast of South Africa. It is situated 15 km north-west of Vredenburg[2] and 145 km north of Cape Town, at Cape Columbine between Saldanha Bay and St Helena Bay. The town covers an area of 194.8 hectare and has approximately 1883 inhabitants.</p> <p>The origin of the name remains unknown. Many people believe that the name, which means 'Our Father' in Latin, refers to prayers said by Catholic Portuguese seamen when they became shipwrecked.[3] It appears as St. Martins Paternoster on an old map of Pierre Mortier.[4] Other people believe it refers to the beads that the Khoi tribe wore that were called Paternosters.[5]</p> <p>Paternoster is a sought after tourist destination and is known for lobster and the white-washed fishermen's cottages. The remarkable coastline of jagged cliffs and white boulders makes this one of the most beautiful beaches on the West Coast of South Africa."</p> <p>These two villages (Paternoster and St Heklena Bay) will be most affected by the visual impact of the proposed WEF.</p> <p>Under the heading: 6.4.5 Western Cape Province Spatial Development Framework, under sub-heading: Landscape and scenic assets (page 85 and following) it is stated: A specialist study was undertaken into the Province's cultural and</p>		

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	<p>scenic landscapes. This study was one of the informants of the 2014 PSDF. It established that the WCP's cultural and scenic landscapes are significant assets underpinning the tourism economy, but that these resources are being incrementally eroded and fragmented. According to the study agriculture is being reduced to 'islands', visual cluttering of the landscape by non-agricultural development is prevalent, and rural authenticity, character and scenic value are being eroded. The mountain ranges belonging to the Cape Fold belt together with the coastline are identified as the most significant in scenic terms and noted to underpin the WCP's tourism industry.</p> <p>A number of scenic landscapes of high significance are under threat, mainly from low density urban sprawl, and require strategies to ensure their long term protection. These include landscapes under pressure for large scale infrastructural developments such as wind farms, solar energy facilities, transmission lines and shale gas development in the Central Karoo. With regard to renewable energy the following policy provisions are of relevance:</p> <p>» R 5.6: Priority focus areas for conservation or protection include:</p> <ul style="list-style-type: none"> * Rural landscapes of scenic and cultural significance situated on major urban edges and under increasing development pressure, e.g. Cape Winelands; * Undeveloped coastal landscapes under major development pressure; * Landscapes under pressure for large scale infrastructural developments such as wind farms, solar energy facilities, transmission lines and fracking, e.g. Central Karoo; and * Vulnerable mountain passes and ports. <p>The concerns raised in these sections of the Provincial Framework are further emphasised by section 6.4.11 of the report which deals</p>		

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	<p>with Guidelines for the development on mountains, hills and ridges. As far as the local municipal planning is concerned the issues round spatial development are found on page 96 under section 6.5.11 West Coast District Spatial Development Framework. Under section BE17 (page 101) it is stated that: Wind farms and solar farms should be located where their visual and environmental impact will be the lowest.</p> <p>In addition consideration must be given to the SBM By-law on Municipal Land Use Planning (2015) (as quoted in section 3.3 DESCRIPTION OF THE CADASTRAL LAND USE OF THE PROJECT of the Scoping Report on page 31 under the heading Other restrictions in terms of the Saldanha Bay Municipality: By law on municipal land use planning(2015)) which states:</p> <ul style="list-style-type: none"> » 30 m building line with adjacent neighbour's consent. » Mineral right holder's consent. » No visual impact from Paternoster. <p>See also page 102, where the Saldanha Bay Municipal SDF is discussed. At the bottom of the page under Renewable Energy Generation, the Key Principles Reiterated Include:</p> <ul style="list-style-type: none"> » Excluding commercial WEF developments from areas with high aesthetic landscape value » Encouraging commercial WEFs in areas where they are well located in terms of visual impact, » Encouraging commercial WEFs in areas where visual disturbance to the landscape has already occurred (e.g. power transmission lines.). <p>It is clear that both the Western Cape government and the Saldanha Bay municipality place emphasis on preserving areas of scenic beauty and minimising the visual impact of industrial developments in areas where tourism is a significant contributor to the local economy.</p>		

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	<p>To repeat the point made above (under Tourism): The general public has no clear idea of the visual impact of a WEF. It should be of importance to get informed consent from the public as this WEF will be with us for a very long time. Question 2 is therefore repeated here as Question 7:</p> <p>Question 7: Will the visual impact of the wind turbines as seen from the main tourism areas be made public in a way which is clear and unambiguous. (We would suggest photographs with the turbine towers superimposed, to scale.)</p> <p>The repeated emphasis on visual impact seems to suggest that comparative studies should be done so that the most suitable site can be chosen.</p> <p>For example the site marked No 20 Velddrif Wind in Figure 20, page 100 is not close to the sensitive tourism areas, it lies in the path of a high voltage distribution line, the countryside consists of flat farmlands, i.e. no turbulence in the wind flow, there are no residential areas.</p> <p>Question 8: Have comparative studies been done, and what was the outcome? How do alternative sites compare in terms of the criteria for selection?</p> <p>Mention is made in section 6.5.3 of the Saldanha Bay Municipality Municipal SDF (page 102 of the scoping report). The following points are worth noting:</p> <ul style="list-style-type: none"> » The economies of scenic coastal towns such as Paternoster, Langebaan and St Helena Bay are already heavily reliant on tourism inflows. » The key tourist attractions include annual wildflower displays and the scenic beauty of the coastal settlements. » The environmental setting plays a key role and protection of the landscape and scenic amenity are identified as pivotal to the region's tourism development strategy. » The importance of developing a network of scenic roads is 		

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	<p>highlighted.</p> <p>Regarding the development of a network of scenic roads i.e. tourism routes. An obvious tourism route is the road linking Paternoster and St Helena Bay. The Table labelled ROADS, under the section 2.1, page 15, in the Visual Assessment Scoping Report indicates that WEFs should be sited 2km away from tourism routes.</p> <p>Question 9: If the road linking Paternoster and St Helena Bay may be considered as a road to be developed as a tourism route why is this not considered in the placing of the wind turbine towers?</p> <p>Comments on section 3.3.1, Topography, page 25, of the Visual Impact Scoping Report:</p> <p>Profiles are a great way of showing the visibility of the turbine towers from various points. Unfortunately profiles are only drawn from Paternoster and not from other affected areas. More profiles would show that the wind turbines would also have a visual impact on areas in the St Helena Bay area, e.g. Britannica Heights smallholdings and even Shelly Point.</p> <p>Page 25 of the Visual Impact Scoping Report, referring to the profile from West to East, mentions Kasteelberg as adding 'scenic value' to the coastal flats. Surrounding Kasteelberg with wind turbine towers is hardly likely to enhance the scenic quality of the view from Paternoster. It is further stated that Kasteelberg will provide some screening to the bulk of the turbines located to the East of Kasteelberg. Not many turbines are involved here and those that are located to the East will be visible, protruding over Kasteelberg.</p> <p>Talking about turbines being focal points in the visual landscape, or being sculptural elements against a background of wheatfields, seems to be missing the point. These turbines are intruding in a rural landscape. No amount of 'art speak' is going to make that go away. The turbines are not 'absorbed in the background views'.</p>		

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	<p>Certainly not when there are 45 flashing red lights lighting up the sky!</p> <p>Question 10: Have any studies been done on the visual impact of flashing lights? Each turbine tower will be fitted with a flashing light (red at night), these are visible from great distances.</p> <p>Question 11: Have any studies been done on the visual impact of moving objects? The blades of the turbines are huge and as is well known moving objects attract the eye.</p> <p>Implementing a 4 km buffer along the coast would not have any significant impact, only two turbines are affected! Furthermore, on a flat coastal plain such as found bordering Paternoster, there are no natural features to mitigate the effect.</p> <p>Page 45 (Visual Impact Scoping Report) Key Observation Points. Note: Britannia Bay is not included, the point labelled Britannia Bay is in fact located in an area where there are no residential areas. Britannica Heights smallholdings is not included amongst the KOPs, yet it overlooks the whole of the proposed WEF.</p> <p>C: Comments on Appendix D: General Wind Assessment</p> <p>The wind data presented:</p> <p>(a) Rely on calculations based on measurements taken at a wind tower situated on flat ground some distance away from the proposed WEF.</p> <p>(b) Do not give any indication of the possible fluctuation in wind speed and direction at the site of the proposed WEF.</p> <p>(c) Do not allow for comparison with other sites in the near vicinity.</p> <p>Question 12: Wind measurements in the affected area have only been conducted since March 2015, according to the General Wind Assessment report, and another wind measurement tower will be commissioned in June 2016. Does this provide reliable statistics on which to base a decision?</p> <p>Question 13: Can comparative wind data be provided for the site</p>		

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	<p>marked No 20 Velddrif Wind in Figure 20, page 100?</p> <p>Question 14: The rated wind speed of the proposed wind turbines is 12 m/s (page 3 of the General Wind Assessment report, Table 1: Enercon E-113 3MW IEC Class IIA) the mean wind speed at the proposed site is 6.71 m/s (3 yr mean) according to WM04, (table in Figure 5 of the Wind Assessment report). No data for the wind measurement tower M1 is presented.</p> <p>How will the power output from the turbines be affected by this lower-than-rated wind speed?</p> <p>Question 15: The size of the turbine with its blades is such that, due to inertia, it cannot respond to fluctuations in wind direction. This will have an effect on the mean power output from the turbine as compared to a turbine in an area where the wind does not vary in direction. Has this been considered in site selection, selection of the turbines, claimed output energy delivery?</p> <p>D: Comments on: Appendix D: Noise Report for Scoping Purposes It is assumed that the noise profile for the Enercon turbines selected for the Vredenburg WEF is comparable with those shown in Figure 4.1 of the Noise Report. However there is a variation of about 3 dB between the quietest and noisiest turbines so it would be necessary to have a similar curve for the Enercon turbines.</p> <p>The prevailing wind during summer (the windy season) is SSE to SSW (approximately 100 either side of due South). This should be considered in calculating the effect of noise on the NSDs in the area, i.e. which of the NSDs lie downwind from the WEF? The noise radiation pattern (vertical and horizontal) is of importance in determining which of the NSDs will be adversely affected. Some NSDs are below the level of the turbine hub and some are at a height almost in line with the turbine hub.</p>		
55.	With reference to the Scoping Report and recent meeting with Shawn Johnston and others; herewith my comments:	AM Adendorff Interested and	It is noted that the I&AP is a resident of Britannica Heights.

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	<p>1) Visual Effects If implemented, the windfarm would totally destroy the view from our property over the farmlands towards Paternoster and the tranquillity of the area, the main reason why we settled here. The market value of our property would also be reduced to practically zero, which is totally unacceptable.</p> <p>When Eskom planned the extension of their power line to Stompneus Bay along the boundary of Britannica Heights, the prospective buyer of the plot adjacent to our smallholding withdrew his offer, attached a copy of his declaration (Annexure A). Following objections from the plot owner in Britannica Heights Eskom rerouted the power line along the valley on adjacent farm. The visual impact of the proposed wind turbines would be infinitely worse than the power lines.</p> <p>2) PAR 14.7.3 (in red brackets) of the final Scoping Report for the proposed 140MW Vredenburg Wind Farm (Pty) Ltd DEA Ref: 12/12/20, which was not implemented, states that "...wind energy projects have profound implications for people who live close to windfarms... including annoyance and sleep disturbance".</p> <p>6) "... developers and policy makers should engage seriously, honestly, openly and inclusively with affected communities..."</p> <p>PAR 14.8 "... wind turbines do emit noise at sufficient levels to propagate over large distances..."</p> <p>The National Research Council, Environmental Impact of Wind-Energy Projects 2007 NRC, Washington DC: "... wind energy</p>	<p>Affected Party Britannica Heights Residents Letter: 01-04-2014</p>	<p>1) As part of the sensitivity analysis undertaken in the Scoping report the comments received from the Britannica Heights Residents were considered which relates to the visual intrusion on the line of sight from Britannica Heights towards Paternoster. This impact would not be mitigatable should the development proceed in that area. Due to the comments from the Britannica Heights residents and other environmental constraints and features located within the northern portion of the project site the southern portion was identified as having the highest potential for the development of the Boulders Wind Farm. The identification of the area with the highest potential for the development resulted in the southern section being identified as the preferred development area within which the development footprint (i.e. facility layout) will be located. The analysis therefore considered the visual impact on the Britannica Heights residents and has now avoided the area which would have created visual intrusion towards Paternoster. However, the visual impact of the facility will be further assessed and ground-truthed during the EIA phase.</p> <p>The potential for impact on property values will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of property trends and values within the area.</p> <p>2) It is noted that wind energy facilities may impact on the health of the residents located within the area of a wind farm. The Noise Scoping Study (Appendix K), undertaken in the Scoping phase, has identified noise sensitive developments (mainly homesteads) within and surrounding the project site that will be sensitive to noise. A 500m buffer was applied to these</p>

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	<p>projects create negative impacts on human health and wellbeing, the impacts are experienced mainly by people living near wind turbines who are affected by noise and shadow flicker".</p> <p>From the above it is quite clear that, due to the possibility of harm to human health, wind farms should be sited away and out of sight of residential areas.</p> <p>The proposed windfarm would be directly in sight of Britannica Heights, Paternoster and near to farmsteads and is therefore totally unacceptable.</p> <p>3) Alternatives: In terms of the NEMA EIA Regulations all Scoping Reports must contain a description of any feasible and reasonable alternative including a description and comparative assessment of the advantages and disadvantages that the proposed activity and alternatives will have on the environment and the community that may be affected by the activity.</p> <p>"Alternatives" in the context of an activity may include:</p> <ol style="list-style-type: none"> a) The property on which or location where it is proposed to undertake the activity. b) The type of activity to be undertaken. <p>I submit that the "No Go" option, apart from not implementing the development at all, also means not implementing it on the proposed site but on another portion of land.</p> <p>From the maps in the Weslander of 12 June 2012 which shows the sites allocated for renewable energy it is clear that enough land is available elsewhere where it can be moved to, out of sight of residential areas.</p>		<p>developments which need to be avoided by the wind turbines. The Noise Impact Assessment will further assess and ground-truth the noise impact during the EIA phase. A Visual Scoping Study (Appendix L), undertaken in the Scoping phase, has identified shadow flicker as a potential visual impact. The Visual Impact Assessment will further assess and ground-truth the potential for shadow flicker during the EIA phase.</p> <p>3) The Scoping report is in-line with the requirements of the EIA Regulations, 2014, as amended. All alternatives considered and assessed as part of the Boulders Wind Farm project are included in Section 2.4 of Chapter 2 of the Scoping report. The alternatives considered include site-specific alternatives, activity alternatives, technology alternatives, layout footprint design alternatives, grid connection alternatives and the 'do-nothing' alternative.</p> <p>It must be noted that the no-go option (i.e. 'do-nothing' alternative) considered in the Scoping report only relates to the option of not developing the Boulders Wind Farm within the project site. The alternative which the I&AP is referring to is the site alternative.</p> <p>It is noted that Renewable Energy Development Zones (REDZ) have been determined for the fast-tracking of the development of renewable energy facilities within the country, however it is not required that all facilities need to be located within these areas. As part of the project the developer has undertaken a site selection process in order to identify a project site that is both technically and environmentally suitable. The site selection process was undertaken in 2010 and a report regarding the findings of the site selection process has</p>

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	<p>In terms of the NEMA EIA Regulations feasible and reasonable alternatives must be comparatively assessed.</p> <p>Such a comparison between the proposed windfarm and a photovoltaic facility should therefore contain the following in detail:</p> <ul style="list-style-type: none"> • Efficiency Comparison: <ul style="list-style-type: none"> – For the proposed windfarm, the average hourly/daily/monthly windspeeds – For a photovoltaic facility the average hourly/daily/monthly available sunshine • Potential Bio-physical impacts 		<p>been included as part of Appendix O. Therefore, the site selection process has lead the developer to identify a feasible project site within the Saldanha area for the development of a wind farm.</p> <p>It is noted that feasible and reasonable alternatives must be comparatively assessed, however the Regulations (Chapter 2, Section 2 (g)(x)) also makes provision for motivating should alternatives not be assessed as part of the process.</p> <p>Section 2.4.3 of Chapter 2 (Technology alternatives) considers the option of rather utilising solar energy technology than wind energy technology. It is stated in the Scoping report that solar energy technology would not be viable within the project site location due to the topography of the landscape as well as the increased development footprint impact it poses on agricultural land (i.e. total loss of an area located within the development footprint of a solar energy facility). Also, solar energy developments are much more viable in the Northern Cape than the Western Cape due to a higher solar irradiance. As per the above motivation, solar energy technology is not considered to be a feasible alternative for the project site and can therefore not be comparatively assessed against wind farm energy technology.</p>
56.	<p>I would like to take this opportunity to register, on behalf of Caelis nature Reserve Pty Ltd., as an interested party in the matter of the proposed Boulders Wind Farm and hereby lodge our objection to the development.</p> <p>We have been owners and residents of Caelis Nature reserve, which forms part of the Groot Paternoster Nature reserve and also the Cape Columbine conservancy, for the past thirty-two years</p>	<p>Spencer Chaplin Director</p> <p>Caelis Nature Reserve (Pty) Ltd</p> <p>Email: 02-04-2018</p>	<p>Spencer Chaplin of the Caelis Nature Reserve has been registered on the project database. The objection against the Boulders Wind Farm is noted.</p> <p>It is also noted that the Caelis Nature Reserve, which is part of the Groot Paternoster Nature Reserve and the Cape Columbine Conservancy, stands for the conservation of the area including fauna, flora and visual beauty.</p>

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	<p>and are committed firmly to the conservation of the area both in terms of the Fauna and flora and the open spaces and visual beauty of the west coast at large.</p> <p>I have attached the objections of Peter and Beverley Pickford as our motivation for the objection, as I could not have written a more comprehensive and heartfelt objection had I tried.</p>		<p>It must be noted that Mr. Pickford's comments have been included as comment number 46 of this comments and responses report. .</p>
57.	<ol style="list-style-type: none"> 1. Montero Mining and Exploration Limited ("Montero") is a registered interested and affected party ("IAP") in respect of the proposed Boulders Wind Farm ("Project") which we understand is intended to be developed by Vredenburg Windfarm (Pty) Ltd ("Project Company"). Montero received email notification of the Environmental Impact Assessment process to be undertaken by Savannah Environmental Proprietary Limited ("Savannah" / "EAP") for the proposed Project on 26 January 2018. A subsequent notice of availability of the Scoping Report (Revision 0), dated March 2018 ("Scoping Report") for a 30 day review period was received on 28 February 2018. 2. As an IAP, Montero is permitted in terms of Regulation 43 of the Environmental Impact Assessment Regulations, 2014 as amended ("EIA Regulations"), to provide written comment on all reports or plans, and to bring to the attention of the applicant any issues which are of significance to the consideration of the application. 3. This document constitutes our comments on the Scoping Report We reserve our rights to supplement our comments upon receipt of further information including, but not limited to, the Environmental Impact Assessment Report which will be drafted for the proposed Project. 	<p>Beatrix Spargo Associate</p> <p>Webber Wentzel for Montero Mining & Exploration</p> <p>Letter: 02-04-2018</p>	<p>It is noted that submission is made on behalf of Montero Mining & Exploration, who is the holder of a prospecting right on a farm portion which is also part of the wind farm application.</p> <ol style="list-style-type: none"> 1. Receipt of the notifications pertaining to the project by the I&AP is noted. 2. All I&APs are encouraged to provide comment regarding the Boulders Wind Farm project and EIA process. 3. It is noted that Montero will provide supplementary comments on the project subject to the receipt of additional information and the EIA report. 4. Montero's interest in the project is noted. <ol style="list-style-type: none"> 4.1 It is noted that Montero has a prospecting right on the farm Schuitjes Klip 22 Portion 1 and that the property is intended to be developed as a phosphate mine and fertilizer operation. 4.2 The layout of the Boulders Wind Farm will be made available for comment and review during the EIA phase. However, it is the intention of the developer to place the infrastructure within the preferred development area (which excludes the farm Schuitjes Klip 22 Portion 1), although this will only be confirmed in the EIA phase once the facility layout is

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	<p>4. Montero's interest in the Project</p> <p>4.1. Montero is the holder of prospecting right WC30/5/1//12//10090 PR, which was granted in terms of the Mineral and Petroleum Resources Development Act, 28 of 2002 ("MPRDA") ("Prospecting Right"). The Prospecting Right covers an area measuring approximately 1921.2132 hectares over the following properties: Portion 1 of Farm Skuitjesklip 22 (listed as Schuitjes Klip Portion 1 of Farm 22 in the Scoping Report) ("the Property"), and Portions 4, 5, and 7 of the farm Duyker Eiland 6. Montero intends to establish a phosphate mine and fertilizer operation on the Property and several other properties to which the Prospecting Right relates ("Duyker Eiland Phosphate Project").</p> <p>4.2. The proposed Project site includes the Property over which we intend to conduct prospecting operations in accordance with our Prospecting Right. It is recommended in section 7.4 of the Scoping Report that limited infrastructure should be placed on the Property, which is "considered less favourable for inclusion in the development footprint area" due to overlapping no-go areas and environmental sensitivities including visual, heritage, noise. It is nevertheless recommended in the Scoping Report that the Property should be included in the Project Site, albeit for the development of "limited wind farm infrastructure". It is unclear what sort of infrastructure is intended to be developed on the Property.</p> <p>4.3. To date drilling and various mining and beneficiation studies have been undertaken for purposes of the Duyker Eiland Phosphate Project and a bankable feasibility study</p>		<p>available.</p> <p>4.3 It is noted that drilling and a bankable feasibility study has been undertaken for the proposed phosphate mine and beneficiation plant.</p> <p>4.4 It is noted that with the inclusion of the farm Schuitjes Klip 22 Portion 1 as part of the wind farm project site, the development of the proposed phosphate mine and beneficiation plant would potentially be impacted. Preferred Environmental areas will be further considered in the EIA Phase, where no prospecting rights exist.</p> <p>4.5 The 140MW Vredenburg Wind Farm referred to by the I&AP is the previous EIA process undertaken for the development of a wind farm within the project site, however the application was never completed and was undertaken by Terramanzi as the EAP. The name of the applicant was Vredenburg Windfarm (Pty) Ltd. The EIA process being undertaken for the Boulders Wind Farm now is a new application for Environmental Authorisation within the previously assessed project site. No additional facilities are planned.</p> <p>4.6 It is noted that comments submitted by Montero relate to the farm Schuitjes Klip 22 Portion 1 due to their prospecting rights on the property.</p> <p>4.7 It is noted that the Prospecting Right, which is a pre-existing right, is not viewed as being a compatible land use with the wind farm. It is noted that Montero requests that all project infrastructure be located within the preferred development area as it does not include the farm Schuitjes Klip 22 Portion 1 and will therefore not impact on the prospecting right.</p> <p>5. Assessment of Need and Desirability in the Scoping Report The need and desirability of the development within the project site is in line with the Regulation 18 and Appendix 2 of</p>

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	<p>for the establishment of a phosphate mine and beneficiation plant is currently underway in respect of the Property.</p> <p>4.4. We are of the view that the granting of an environmental authorisation for the proposed Project, which includes the Property in respect of which we hold a Prospecting Right, will severely curtail our ability to exercise our rights to the fullest extent or at all.</p> <p>4.5. On or about 2016, Montero submitted similar objections in respect of the 140MW Vredenburg Wind Farm, which appears to be substantially the same development and is located on many of the same properties as the proposed Project described in the Scoping Report. Please clarify whether the current Project is an additional development to the Vredenburg Wind Farm and how these two developments are related, if at all.</p> <p>4.6. Our comments in respect of the current Scoping Report are set out below and relate mainly to the consideration of the impact of the proposed Project on the Property and on Montero's prospecting operations, which has not been referenced or assessed in the Scoping Report.</p> <p>4.7. We are of the view that the exercise of our Prospecting Right, which is a pre-existing right, is not compatible with the development of Project infrastructure on the Property. We request that this infrastructure be re-positioned to the "preferred development area" or other alternative areas of the proposed Project site. In addition, the intended development of Project infrastructure on the Property is expected to result in certain highly negative environmental impacts.</p> <p>5. Assessment of Need and Desirability in the Scoping Report</p>		<p>the EIA Regulations, 2014, as amended. The need and desirability of the development within the project site has been included as per Appendix O as provided by the developer, and has also been considered in Section 2.3 of Chapter 2 of the Scoping report. Although a pre-existing right for prospecting is held, this has not yet commenced. The Scoping Report will be rectified to acknowledge that one of the farms making up the proposed Project site (farm Schuitjes Klip 22 Portion 1) is subject to a pre-existing Prospecting Right. It is understood that Montero intends to apply for a Mining Right over the Property and establish the Duyker Eiland Phosphate Project. However, this application is yet to be made, and so will not be considered as an existing use.</p> <p>The need and desirability of the project, including the consideration of the prospecting right on the farm Schuitjes Klip 22 Portion 1 will be assessed in further detail in the EIA phase.</p> <p>6. Assessment of Impact on Viability and Feasibility of Other Activities</p> <p>The findings of the Scoping report indicates that the preferred development area located within the project site and identified in the Scoping report avoids the property in question. The preferred development area does not infringe on the farm Schuitjes Klip 22 Portion 1 and it is considered unlikely that the farm portion will be impacted by the development of the wind farm or associated infrastructure. The impact assessment would only consider the existing lawful right as a constraint to development, as no Mining Right has been issued in respect of this farm portion.</p> <p>A cumulative impact assessment will be undertaken as part of the EIA report which will consider the cumulative impact of the</p>

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	<p>5.1. The EIA Regulations include:</p> <p>5.1.1. Regulation 18, which is entitled "Criteria to be taken into account by competent authorities when considering applications". Regulation 18 of the EIA Regulations stipulates the following (peremptory) requirement: "When considering an application the competent authority must have regard to section 24O and 24(4) of the Act, the need for and desirability of the undertaking of the proposed activity, any protocol or minimum information requirements relevant to the application as identified and gazette by the Minister in a government notice or any relevant guideline published in terms of section 24J of the Act"; and</p> <p>5.1.2. Appendix 2, prescribes the contents of a scoping report, which must include: "a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location".</p> <p>5.2. With regard to the peremptory regulatory requirements imposed on competent authorities to consider the need for and desirability of the activities for which environmental authorisations are sought in terms of the National Environmental Management Act, 107 of 1998 ("NEMA"), the Department of Environmental Affairs ("DEA") published its Guideline on Need and Desirability in GN R891 of Government Gazette 38108 of 20 October 2014 ("Need and Desirability Guideline") which provides as follows: "the consideration of "need and desirability" during an application process... must consist of a preliminary description of the relevant considerations... in relation to the feasible and reasonable alternatives.</p>		<p>Boulders Wind Farm and include other commercial ventures in the vicinity, as required.</p> <p>7. Scoping of potential issues assessed against outdated legislative requirements It must be noted that the content included in the tables as per section 6.1 and 7.1 is correct and as per the EIA Regulations, 2014, as amended on 07 April 2017. The typing error to the numbering listed of the relevant requirements refer to (h), but should in fact be (g). This has been corrected in the Final Scoping Report.</p> <p>8. Assessment of Risks associated with the proposed WEF As the preferred development area, as identified in the Scoping report, does not infringe on the farm Schuitjes Klip 22 Portion 1, it is not considered that significant impacts or conflicts in land use will occur. However, the potential future prospecting activities in terms of the lawful right will be considered as part of the EIA process. A cumulative impact assessment will be undertaken as part of the EIA report which will consider the cumulative impact of the Boulders Wind Farm and include other commercial ventures in the vicinity, as required. This will include the prospecting right on the farm Schuitjes Klip 22 Portion 1.</p> <p>9. Assessment of socio-economic impact of the Project The identification and evaluation of actual and potential impacts on the environment, on socio-economic conditions and the associated risks and consequences of the project must be adequately considered in order to give effect to the general objective of integrated environmental management required in terms of section 2, section 23(2)(b) and section 24(4)</p>

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	<p>During the actual assessment stages of an EIA process the need and desirability must be specifically assessed and evaluated... In evaluating each impact (negative and positive) in terms of each of the aspects of the environment, "need and desirability" must specifically be considered in the analysis of each impact of the proposed activity."</p> <p>5.3. The importance of a proper consideration and analysis of need and desirability cannot be refuted in the EIA process. This is borne out by the list of questions in the Guideline on Need and Desirability to be engaged with when considering need and desirability, where it records the following: "...the need for and desirability of a proposed activity must specifically and explicitly be addressed throughout the EIA process... when dealing with individual impacts and specifically in the overall impact summary by taking into account the answers to inter alia the following questions... What is the socio-economic context of the area?... considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? How was a risk averse and cautious approach applied in terms of socio-economic impacts? What measures were taken to pursue the selection of the "best practicable environmental option" in terms of the socio-economic considerations?"</p> <p>5.4. The assessment of the need and desirability of the proposed Project set out in the Scoping Report does not include any reference to or assessment of Montero's current and planned prospecting activities and future mining activities that are intended to take place on the</p>		<p>of NEMA. The Social Impact Assessment to be undertaken as part of the EIA phase will assess the socio-economic impacts and consequence that the proposed project will have on the larger area, and consider the prospecting right for the farm Schuitjes Klip 22 Portion 1, where this property and the prospecting right activities are impacted through the development of the wind farm project.</p> <p>10. 'Do nothing option' assessment is misleading Due to the fact that the mine has not been authorised at the time that the Scoping report was undertaken the land-use practises are still considered to be agricultural and will continue to be agricultural. The assessment of a 'no-go' alternative in the Environmental Impact Assessment report will take cognisance of the lawful prospecting activities to be carried out on the property, where this property and the prospecting right activities are impacted through the development of the wind farm project.</p> <p>11. Location of the proposed wind turbines It must be noted that the layout of the facility is to be defined based on the outcome of the scoping phase and the identification of constraints to development. The Scoping does not include turbine locations within the development area, as the developer must consider the findings of the Scoping report in order to design a facility layout which is in line with the recommendations of the specialist studies and the sensitive environmental features located within the preferred development area. It is noted that it is requested by Montero Mining & Exploration that the Property is completely excluded from the Project site due to the environmental sensitivities as highlighted in the Boulders Scoping Report.</p>

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	<p>Property. The benefits that Montero's prospecting and mining activities on the Property will have for the community and the economy, as well as the impacts that the Project will have on Montero's prospecting and mining activities are relevant considerations in assessing the need and desirability of a development such as the Project. The findings of the need and desirability assessment are therefore misleading and biased.</p> <p>5.5. The importance of a comprehensive consideration of the need and desirability of the proposed Project is particularly critical in the light of the fact that Montero is the holder of a Prospecting Right over the Property and has been conducting prospecting activities (and incurring costs). The pre-existing rights awarded to Montero with regard to the utilisation of the Property for prospecting requires that the assessment of need and desirability must apply a risk averse and cautious approach in terms of the identification, consideration and assessment of all impacts of the proposed Project, and, in particular, socio-economic impacts.</p> <p>5.6. Given the potentially significant impact that the proposed Project will have on the viability and feasibility of our prospecting and future mining activities in respect of the Property, it is fundamentally important for a comprehensive analysis of the need and desirability of the Project to take place in the context of existing and planned operations in the immediate area. A comprehensive assessment of this nature must be undertaken during the scoping and environmental impact assessment process and cannot be ignored.</p> <p>5.7. Accordingly, we are of the view that the Scoping Report does not adequately deal with all the relevant</p>		<p>12. Consideration of section 53 of the MPRDA</p> <p>It is noted that the position of Montero is that the development of the project on the Property is contrary to the objects of the MPRDA. In addition, it is noted that Montero requests that as part of the environmental impact assessment process, the Project Company approach the Minister of Mineral Resources for a Section 53 approval as the proposed project may not be constructed on the Property in the absence of this approval. The Section 53 approval will be made by the Applicant once the project has received an Environmental Authorisation, as this is required prior to the application for a Section 53 approval. Through the EIA process, the Department of Mineral Resources has been consulted on the project and the project site, however no feedback has been submitted as yet. As the farm Schuitjes Klip 22 Portion 1 is not included as part of the preferred development area, the risk of a conflict in land use is expected to be low.</p> <p>Montero will be contacted should further detail in this regard be required to inform the impact assessment further.</p>

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	<p>considerations that should pertain to a proper assessment of the need and desirability of the impacts of the activities associated with the proposed Project and, in particular, the impacts of the proposed Project on our operations on the Property.</p> <p>5.8. The strategic policy context in the renewable energy sector has been utilised in the Scoping Report to serve as a determining factor in establishing the need and desirability of the proposed Project, rather than using a comprehensive understanding of the total policy context, as well as competing land uses for informing the enquiry into need and desirability. As set out above, however, the Scoping Report fails to acknowledge that one of the farms (being the Property) making up the proposed Project site is subject to a pre-existing Prospecting Right. Accordingly, it is unclear how statements such as "the affected farm portions have not been considered for an alternative land use" can be made when the Scoping Report has failed to acknowledge that a Prospecting Right has been granted over the Property. Montero intends to apply for a Mining Right over the Property and establish the Duyker Eiland Phosphate Project. Montero's activities in this regard will have a many positive impacts.</p> <p>5.9. In this regard, we record that Montero's prospecting and future mining activities will create up to 1,000 direct skilled and semi-skilled jobs for the operation of the mine and beneficiation plant over at least a 20 year period. In addition to this, our operations will take up to a year to construct to an operational stage and this will involve contracting local companies and labourers in this process. All supplies, construction material, equipment and machines will also be sourced locally supplying</p>		

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	<p>additional jobs through the construction and operation period of the mine.</p> <p>5.10. Further, the Need and Desirability Guideline provides that whilst applicable policy is a relevant consideration, NEMA requires that, in addition to the policy context, the merits of the application must be assessed at project level. Critical to an assessment of the merits of the application is the need to assess ecological and socio-economic impacts. In this regard, the Need and Desirability Guideline provides that environmental assessment reports "must specifically provide information on these impacts in order to be able to consider the merits of the application".</p> <p>5.11. The need and desirability analysis in the Scoping Report is based largely on the immediate effects of the proposed Project. We reiterate our view that the need and desirability assessment is incomplete as, among other things, there is a failure to evaluate and assess the social and economic effects that the proposed Project will have on surrounding existing and planned commercial activities, and in particular the prospecting and future mining activities to be undertaken on the Property.</p> <p>5.12. By failing to assess the impact on the viability and feasibility of our prospecting activities, the Scoping Report fails to ensure that the need for and desirability of the proposed Project is specifically and explicitly addressed in the Scoping Report, particularly with regard to individual project impacts. Accordingly, we are of the view that in terms of satisfying the requirements of the EIA Regulations, the need and desirability of the proposed Project must be assessed against the backdrop of our Prospecting Right granted in terms of the MPRDA.</p>		

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	<p>6. Assessment of Impact on Viability and Feasibility of Other Activities</p> <p>6.1. Following on from the above, we note that the Scoping Report does not appear to consider and/or recommend an assessment of the following:</p> <p>6.1.1. the technical feasibility of constructing the proposed Project on land over which a Prospecting Right has been granted. This would include the need to verify the potential impacts and implications for the design, engineering work and implications of additional constraints that would be imposed, directly and indirectly, on the operational aspects of the proposed Project as a result of the prospecting activities;</p> <p>6.1.2. the operational risks in terms of unforeseen impacts, downtime, and effects on operational capacity of the proposed Project have not been considered in connection with the exercise of pre-existing rights regarding prospecting activities on the Property; and</p> <p>6.1.3. the proposed facility will potentially impact on the financial viability of our operations and the business model for our future mining activities. This proposed Project could directly threaten the feasibility of our operations in South Africa and this is contrary to the objects of the MPRDA and of promoting sustainable development.</p> <p>6.2. Accordingly, in addition to an assessment of the need and desirability of the proposed Project, and taking into account our prospecting operations and planned mining of the Property, it is submitted that a comprehensive assessment should be undertaken as to the impact of the</p>		

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	<p>proposed Project on all surrounding commercial operations. A failure to undertake such an assessment will render the environmental impact assessment process flawed and incomplete.</p> <p>7. Scoping of potential issues assessed against outdated legislative requirements 7.1. Chapter 6 of the Scoping Report describes the environmental issues and potential impacts pertaining to the Project that have been identified by the EAP. It is evident from section 6.1 and 7.1 of the Scoping Report that the issues impacts have been assessed against the requirements of Appendix 2 of the EIA Regulations, 2014, before these Regulations were amended by Government Notice 326 on 7 April 2017, which is erroneous and procedurally irregular.</p> <p>8. Assessment of Risks associated with the proposed WEF 8.1. In the context of a scoping and environmental impact assessment process for a Project as proposed, a risk assessment plays a vital role in the identification and assessment of potential socio-economic and environmental impacts (including cumulative impacts), as required in term of the EIA Regulations. 8.2. In this regard, a risk assessment is imperative to ensuring that a risk averse and cautious approach is applied in the context of both impact assessment and decision-making, as required in terms of section 2 of NEMA. In the current circumstances, a risk assessment entails a comprehensive assessment of potential cumulative impacts. 8.3. Given that the proposed Project will have an impact on the Property and our prospecting and future mining</p>		

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	<p>activities, we are of the view that there are significant implications for the risk assessment which is required to be undertaken for the proposed WEF.</p> <p>8.4. In this regard, we note that:</p> <p>8.4.1. the Scoping Report has failed to accurately identify, consider and assess all potential risks (and associated probabilities) insofar as they relate specifically to the proposed Project and its impacts on our current and future activities; and</p> <p>8.4.2. a proper assessment of potential risks associated with the proposed Project is to include the consideration of the interactions between the proposed Project and our prospecting activities in the context of operational constraints and potential incidents, particularly where such activities are undertaken on the same properties.</p> <p>8.5. In terms of satisfying the requirements of the EIA Regulations, the assessment undertaken is required to address the direct, indirect and cumulative health and safety impacts of the proposed Project against the backdrop of our prospecting. This is particularly critical in the light of the obvious safety considerations and implications of undertaking these potentially competing activities within close proximity.</p> <p>9. Assessment of socio-economic impact of the Project</p> <p>9.1. The environmental management tool most heavily relied upon in the South African environmental regulatory framework for giving effect to the integrated environmental management of activities is the basic assessment and scoping and environmental impact assessment process, regulated in terms of the EIA</p>		

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	<p>Regulations. As such, members of the public and other stakeholders rely heavily on the EIA process as a mechanism for achieving the key objectives of integrated environmental management articulated in Chapter 5 of NEMA.</p> <p>9.2. In this regard, we note that the Scoping Report has failed to identify, predict or assess the impacts of the proposed Project on socio-economic conditions in a meaningful way. This is because an informed evaluation and assessment of the potential consequences of the proposed Project on existing rights and our prospecting activities within the area has not been undertaken. Neither the Scoping Report, nor the Socio-Economic Scoping Assessment (Compiled by Tony Barbour Environmental Consulting and Research (dated February 2018), attached as Appendix J ("SIA") to the Scoping Report), consider, evaluate or assess the impacts that the proposed Project will have on Montero's operations on the Property.</p> <p>9.3. It is important that all of the rights and interests that might be adversely affected by the proposed Project be identified and assessed at the earliest possible stage in the scoping and environmental impact assessment process. The identification and evaluation of actual and potential impacts on the environment, on socio-economic conditions and the associated risks and consequences of the Project must be adequately considered in order to give effect to the general objective of integrated environmental management required in terms of section 2, section 23(2)(b) and section 24(4) of NEMA.</p> <p>9.4. A detailed analysis of the socio-economic impacts and</p>		

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	<p>consequence that the proposed Project will have in the event that the proposed Project sterilises the pre-existing mineral rights over the Property must be included in the Environmental Impact Assessment.</p> <p>10. 'Do nothing option' assessment is misleading</p> <p>10.1. Section 2.4.6 of the Scoping Report provides that "should the do-nothing alternative be implemented the current land-use of the project site will continue, which is related to agricultural activities". Section 8.3 further provides that "the 'do-nothing alternative assumes that the site remains in its current state, that is status quo, and that the current land use practises only continue".</p> <p>10.2. However, no further explanation is provided as to the 'status quo' with a further failure to acknowledge that a Prospecting Right has been granted over the Property, and accordingly prospecting and future mining activities are expected. These are relevant considerations to this assessment and have been ignored.</p> <p>10.3. It is requested that an assessment of a 'no-go' alternative in the environmental impact assessment report takes cognisance of the prospecting and future mining activities to be carried out on the Property.</p> <p>11. Location of the proposed wind turbines</p> <p>11.1. The Scoping Report provides that a total of 45 wind turbines are proposed to be constructed but there no indication of the position of the wind turbines has been provided. Without finality as to the placement of the turbines, no conclusive opinion can be finalised or reached in the environmental impact assessment report (which is to be drafted) with regards to noise impacts,</p>		

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	<p>visual impacts, land values, blasting impacts, impacts on tourism, avifauna impacts, as well as the sense of place. We have provided comments in respect of certain of these concerns hereunder.</p> <p>11.2. Visual impacts</p> <p>11.2.1. We are of the view that no infrastructure should be developed on the Property, particularly given our pre-existing rights. It is noted in the Visual Scoping Assessment – Compiled by Lourens du Plessis t/a Logis (dated November 2017) ("VIA") that the Property is within an area of increased frequency exposure, as shown in Map 3 of the VIA. We request that the infrastructure be re-positioned to other, more suitable parts of the Project site which are less exposed. The re-positioning of the turbines will require a re-assessment of the visual impacts of the Project during the EIA phase.</p> <p>11.3. Impacts on tourism</p> <p>11.3.1. The SIA confirms that the proposed Project is likely to have a negative impact on tourism. The SIA acknowledges the importance of tourism as provided for in the West Coast District Municipality Integrated Development Plan, which lists tourism as a key development sector for regional and local economic development. The SIA also refers to the West Coast District Municipality Spatial Development Framework, which provides facilitating and creating an enabling environment for tourism development is a strategic goal.</p> <p>11.3.2. A further report in Appendix J(a) regarding</p>		

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	<p>property values and tourism provides that "tourism has been identified as one of the key focus points with regard to the greater encompassing Vredenburg area. Historically, tourism has been a great driving force behind economic development in this region of the Western Cape. In truth, the local tourism sector has deep roots in this area and has engrossed itself in almost every aspect of the local populace...key tourism attractions include...the visual aesthetic of the area".</p> <p>11.3.3. The VIA confirms that "the area potentially affected by the proposed development is generally seen as having a high tourism value based on the presence of well-known holiday towns".</p> <p>11.3.4. The close proximity of the Property to Patemoster and the threat posed by the Project to the area's sense of place, and ultimately to tourism, provides further reason to exclude the Property from the Project Site.</p> <p>11.4. General sensitivity of the Property</p> <p>11.4.1. The majority of the maps provided under Appendix Q indicate that large portions of the Property are highly environmentally sensitive (in respect of bats, archaeology and palaeontology). A significant portion of the Property appears to be a no-go area (due to ecological considerations, location of freshwater, bats, avifauna and soils, as well as sensitive noise receptors). In addition, we note that Property does not appear toall within the preferred development area under the Preferred Development Area Map.</p>		

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	<p>11.4.2. Accordingly, it is requested that the Property is completely excluded from the Project site due to the above sensitivities highlighted in the Scoping Report.</p> <p>12. Consideration of section 53 of the MPRDA</p> <p>12.1. The list of applicable legislation in the Scoping Report provided in section 3.5 of the Scoping Report references the MPRDA, and specifically section 53 of the MPRDA. Section 53(1) of the MPRDA provides that "any person who intends to use the surface of any land in any way which may be contrary to any object of this Act or which is likely to impede any such object must apply to the Minister for approval in the prescribed manner".</p> <p>12.2. As stated above, we are of the view that there is a conflict between the use of the Property for (1) the exercise of our pre-existing right to prospect and, once a Mining Right is issued, to establish the Duyker Eiland Phosphate Project; and (2) for the proposed Project, which are mutually exclusive developments. The development of the Project on the Property is contrary to the objects of the MPRDA. Accordingly, Montero requests that as part of the environmental impact assessment process, the Project Company approach the Minister of Mineral Resources for a section 53 approval as the proposed Project may not be constructed on the Property in the absence of this approval.</p> <p>13. Conclusion</p> <p>13.1. For the reasons set out above, we are of the view that the Property should be excluded from the proposed Project site due to:</p> <p>13.1.1. its impacts on our ability to (1) exercise our</p>		

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	<p>Prospecting Right, which is a valid pre-existing right; and (2) establish the future Duyker Eiland Phosphate Project on the Property;</p> <p>13.1.2. the highly negative visual impacts associated with the wind turbines that are intended to be placed on the Property; and</p> <p>13.1.3. the similarly negative impact that the proposed Project will have on tourism and heritage resources.</p> <p>13.1.4. In addition, we note that approval is required from the Minister of Mineral Resources before the Property may be used for the establishment of the Project, which is contrary to the object of the MPRDA.</p> <p>13.2. Please let us know if you would like to set up a meeting to discuss our comments on the Scoping Report or our current and future operations on the Property.</p>		

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58.	<ol style="list-style-type: none"> 1) Your letter dated 28 February 2018 and the Scoping Report for the Boulders Wind Energy Facility refer. 2) The West Coast District Municipality supports the development of renewable energy facilities, provided these are appropriately located. The Vredenburg/Saldanha Bay Peninsula and surrounds are an important tourism destination on the West Coast. The cumulative impact of numerous wind energy facilities will detract from the scenic beauty of the area and thus negatively impact tourism. The area proposed for the construction of the Boulders Wind Energy Facility (WEF) is deemed Highly Restricted in terms of the Draft Strategic Environmental Assessment of Wind Farms in the Western Cape (2010) due to the visual impact that a WEF will have on the surrounding landscape. The West Coast District Municipality will only support WEFs aligned with said Strategy. 3) The Environmental Impact Assessment and EMPr must address issues such as water use, stormwater management, dust suppression, noise control, storage and disposal of general and hazardous waste and the provision of ablution and other facilities that will be dealt with during all phases of the development. 4) A land use application must be lodged with the Saldanha Bay Municipality once Environmental Authorisation is obtained. 	<p>Doretha Kotze Town Planning and Mr D Joubert Municipal Manager</p> <p>West Coast District Municipality</p> <p>Letter: 03-04-2017</p>	<p>The West Coast District Municipality is a commenting authority on this application.</p> <ol style="list-style-type: none"> 1) The support for the development of renewable energy facilities is noted, subject to the appropriate siting of the facilities. The cumulative impact on tourism is noted, the Social Impact Assessment will further assess and ground-truth identified impacts. It is noted that the Municipality refers to the Draft Strategic Environmental Assessment of Wind Farms in the Western Cape of 2010. This process was, however, not finalised and the outcomes were not implemented, and the documentation was not made available publicly. The outcomes of the Western Cape Regional Methodology for Wind Energy Site Selection (May, 2006) which are publicly available indicated that the area is Negotiable, Possible, Preferred or Highly Preferred for wind energy development, with some small areas indicated as being Restricted 2) The EIA Report and the EMPr will consider issues in terms of water use, stormwater management, dust suppression, noise control, storage and disposal of general and hazardous waste and the provision of ablution/facilities during as part of the EIA phase. 3) It is noted that a land use application must be lodged should the Boulders Wind Farm receive Environmental Authorisation.
59.	<ol style="list-style-type: none"> 1) The Scoping Report for Comment for the proposed Boulders Wind Farm dated March 2018 refers. 2) Renewable energy in general, is supported by the Environment and Heritage Section of the Saldanha Bay Municipality. This however, must not be to the detriment of other ecological resources. 3) The Environment and Heritage Section of the Saldanha Bay 	<p>Ms. N. Duarte Environmental Officer</p> <p>Saldanha Bay Municipality</p>	<p>The Saldanha Bay Municipality is a commenting authority on this application.</p> <ol style="list-style-type: none"> 1) It is noted that renewable energy development is supported subject to the facility not being detrimental to ecological resources. 2) Critical Biodiversity areas associated with the intact natural

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	<p>Municipality does not support the further loss and degradation of Critical Biodiversity and Support areas.</p> <p>4) Besides the current drought crisis and level 6B water restrictions, the greater Saldanha Bay is a water scarce area. Further loss or degradation of water resources are not supported.</p> <p>5) Please provide the Land Use Planning Department of Saldanha Bay Municipality with a full Visual Impact Assessment, during the EIA phase. You may forward it to gary.tomlinson@sbm.gov.za.</p> <p>6) Please include the Environment & Heritage Section of the Saldanha Bay Municipality in the EMPr to be notified on any Paleontological and Archaeological findings for our records.</p>	<p>Letter: 03-04-2018</p>	<p>vegetation on the project site has been identified as no-go areas by the ecological specialist and as per the Ecological Scoping Study (Appendix D).</p> <p>3) It is noted that further loss of water resources is not supported. Freshwater features within the project site have been identified as no-go areas to the development of the wind farm in order to ensure the protection of the sensitive features. Refer to the Freshwater Features Scoping Study (Appendix E).</p> <p>4) A full Visual Impact Assessment will be undertaken as part of the EIA phase and will be distributed to the Land Use Planning Department of Saldanha Bay Municipality.</p> <p>5) The EMPr to be compiled as part of the EIA report will include the Environment and Heritage Section of the Saldanha Bay Municipality to be notified on any Paleontological and Archaeological findings.</p>
60.	<p>The Cape Columbine Conservancy, representing 9 landowners in the coastal area of Paternoster, stretching from the border of Trekoskraal to Britannia Bay, hereby objects to the proposed Boulders Wind Farm Project.</p> <p>The visual impact of wind turbines on Paternoster and surrounds will forever tarnish the atmosphere of the West Coast. Tourism is the biggest employer in Paternoster, and the West Coast fishers' village has strict architectural guidelines to protect the atmosphere. The atmosphere of the West Coast also means to retain the historical fishers' village and wind turbines have no place there or in the surrounding area where they are visible. The atmosphere of the West Coast, which is the main attraction for tourists, will forever be tarnished by the wind turbines, with resulting job losses in an area where unemployment is extremely high.</p> <p>Once the wind turbines have been erected, it will create minimal</p>	<p>Gustav Bester Chairman Cape Columbine Conservancy Email: 03-04-2018</p>	<p>The objection from the Cape Columbine Conservancy is noted.</p> <p>An impact on the sense of place to the area (including the Paternoster town) has been identified by the heritage, visual and social specialists as part of the Scoping report. The sense of place will be further assessed and ground-truthed during the EIA phase and within the impact assessment specialist reports. The impact on tourism within the area will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of tourism trends within the area.</p> <p>The potential impacts of the wind farm on birds has been identified in the Scoping report, a 12-month monitoring programme has been undertaken in line with BirdLife South Africa's Best Practice Guidelines, and impacts to avifauna will be further assessed during the EIA phase.</p>

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	<p>job opportunities, but the negative impact on tourism and the resulting job losses will be felt forever.</p> <p>The effect of the wind turbines on the rich birdlife can also have a large negative influence, due to the concentration of large swarms of birds moving along the coastal area. In addition to birds that could collide with the blades, as has already been proven in studies, the influence the turbines have on migration patterns should also be taken into consideration.</p> <p>Therefore, we officially object to the erection of the Boulders Wind Farm in its totality.</p>		
61.	<p>1. The Draft Scoping Report ("DSR") dated March 2018 as received by the Department on 1 March 2018 refers. Please find the Department's comments on the DSR.</p> <p>2. Directorate: Development Management (Region 1) – Mr Rainer Chambeau (Rainer.Chambeau@westerncape.gov.za Tel: (021) 483 2729):</p> <p>2.1. Due to the tip height of the proposed wind turbines (approximately 156m), it is anticipated that the farmsteads, R27, R45 and the R399 located in the vicinity to the proposed site, will be visually exposed to the proposed wind turbines. The Visual Impact Assessment ("VIA") must address the visibility of turbines from the homesteads and the mentioned roads. The VIA must further address the potential for the occurrence of flicker effect which may cause a nuisance to motorists travelling on the R27, R45 and the R399 and farmsteads near the proposed site.</p> <p>2.2. Per DSR, the visual impact of the proposed wind energy</p>	<p>Mr Rainer Chambeau Directorate: Development Management (Region 1) and Ms Adri La Meyer Directorate: Development Facilitation: Western Cape Department of Environmental Affairs and Development Planning</p>	<p>The Western Cape Department of Environmental Affairs and Development Planning is a commenting authority on this application.</p> <p>2.1 The Visual Scoping Study (Appendix L) has identified a potential impact on the observers travelling along the arterial (R27, R45 and R399) and secondary (local) roads and a potential visual impact on farmsteads and homesteads within the project site and the surrounding areas. The potential visual impact of shadow flicker has also been identified. These potential impacts will be further assessed and ground-truthed during the EIA phase.</p> <p>2.2 A Level 4 Visual Impact Assessment will be undertaken in the EIA phase, in compliance with the requirements of Department's Guideline for Involving Visual and Aesthetic Specialists in the Environmental Impact Assessment ("EIA") Process. The assessment will include 3D modelling (i.e. photo simulations) which will provide a visual illustration of the Boulders Wind Farm development footprint (i.e. facility layout) within the project site and from key viewpoints.</p>

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	<p>facility ("WEF") is expected be of a very high magnitude, a probability of occurring and a high impact significance during the operational phase. This Department's Guideline for Involving Visual and Aesthetic Specialists in the Environmental Impact Assessment ("EIA") Process dated June 2005 recommends a Level 4 Assessment for developments where high visual impact is expected. A Level 4 Assessment requires complete 3D modelling and simulations, with and without mitigation. It is recommended that the Terms of Reference for the VIA be amended to include a 3D modelling exercise of the proposed WEF on the surrounding area.</p> <p>2.3. Based on the information provided in the DSR, some of the plant species found on the proposed site are listed as critically endangered. The DSR also indicates that some access roads may cross watercourses. The Draft EIA Report must clearly indicate how the layout of the proposed WEF and associated infrastructure will avoid the areas containing sensitive vegetation and watercourses.</p> <p>2.4. The Draft EIA Report must include a detailed site layout plan, which must indicate the location of the proposed wind turbines and associated infrastructure (including possible new access roads) in relation to high sensitivity areas, as well as the proposed route of the underground transmission cables.</p> <p>2.5. The co-ordinates of the boundaries of the farms must be provided in the draft EIA Report. In addition the coordinates of the following components of the proposed WEF must also be provided:</p>	<p>Letter: 03-04-2018</p>	<p>2.3 The EIA report will include the wind farm layout for review and comment and will include a layout and environmental sensitivity map which will overlay the layout of the facility with the sensitive features in order to understand the impact and confirm where these sensitive areas have been avoided.</p> <p>2.4. A Layout and Environmental Sensitivity map will be included in the EIA report for review and comment. The map will include the layout of the turbines and the associated infrastructure overlain on the mapped sensitive environmental features and the associated buffer areas which are to be avoided.</p> <p>2.5 The co-ordinates of the farm boundaries, turbine positions, the on-site substation, the construction yard, internal roads and the start, middle and end co-ordinates of linear infrastructure will be included in the EIA report, and correlate with the layout plan.</p> <p>2.6 The width of the road reserves and the internal access roads will be included in the EIA report and the relevant listed activities will be applied for.</p> <p>2.7 Appendix C of the final Scoping report includes proof of all notification to I&APs undertaken as part of the process to date.</p> <p>3.1 It is noted that the preferred development area and the layout to be proposed by the developer still needs to be considered and assessed by the specialists during the EIA phase.</p> <p>3.2 The reference to the Saldanha Bay Local Municipality Local Economic Development (LED) Strategy has been removed from the final Scoping report.</p>

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	<p>2.5.1. Each location of the 45 wind turbines;</p> <p>2.5.2. The proposed substation;</p> <p>2.5.3. The construction yard;</p> <p>2.5.4. Internal roads; and</p> <p>2.5.5. The starting -, middle – and end – points of linear activities.</p> <p>2.6. The width of the road reserve of the proposed roads, including internal access roads, must be provided to determine whether the listed activities applied for are applicable.</p> <p>2.7. Please note that the Final Scoping Report to be submitted to the competent authority must include proof of notifying interested and affected parties of the background information document and the DSR. The proof must include, <i>inter alia</i>, the following:</p> <p>2.7.1. If registered mail was sent, a list of the registered mail recipients, as obtained from the post office;</p> <p>2.7.2. If regular mail was sent, a list of the mail recipients, as obtained from the post office;</p> <p>2.7.3. If a facsimile was sent, a copy of the facsimile report;</p> <p>2.7.4. If an electronic mail was sent, a copy of the electronic mail and delivery of reports; and</p> <p>2.7.5. If a "mail drop" was done, a signed register of "mail drops".</p> <p>3. Directorate: Development Facilitation: Ms Adri La Meyer (Adri.LaMeyer@westerncape.gov.za; Tel: (021) 483 2887):</p> <p>3.1. The preliminary combined environmental sensitivity map for the proposed Boulders WEF indicates that the northern</p>		<p>3.3 Table 3.5 of the final Scoping report has been updated to include the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013.</p> <p>3.4 The developer, in consultation with the St Helena Community WEF and wind and solar energy facility at Nooitgedacht, has been liaising with the development companies of the aforementioned facilities via email. Proof of this correspondence is included in Appendix O.</p> <p>4. Comment noted, no response required.</p> <p>5. Comment noted, no response required.</p>

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	<p>portion of the development site appears unsuitable for the proposed WEF development. The preferred development area to be considered and assessed in the EIA phase appear to consist of Portions 2 and 5 of the farm Boebezakskraal No 40; Portion 2 of Farm Frans Vlei No. 46; Portion 1 of Farm Het Schuytje No. 21; and Portion 3 of Farm Schuytjies Klip No. 22. The applicant is advised that the proposal of 45 wind turbines may not be feasible within the reduced developable footprint and that the final layout will be determined based on the findings of the various specialists in the EIA phase.</p> <p>3.2. Kindly note that reference to the Saldanha Bay Municipality Local Economic Development ("LED") Strategy referred to in Table 3.4 of the DSR is outdated. The LED Strategy of 2005 has since been updated and replaced with the Saldanha Bay Municipality Medium Term Economic Development Strategy of May 2013.</p> <p>3.3. Please also note that the Western Cape Noise Regulations as referred to in Table 3.5 of the DSR has been replaced by the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013.</p> <p>3.4. Proof of confirmation of the developers at the St Helena Community WEF and wind and solar energy facility at Nootgedacht that they no longer intend to continue with the renewable energy developments will no longer proceed.</p> <p>4. Please direct any enquiries to the officials indicated in this correspondence should you require any clarity on any of the</p>		

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	<p>comments provided.</p> <p>5. The Department reserves the right to revise or withdraw comments and request further information based on any or new information received.</p>		
62.	<p>The Long Beach Home Owners Association submitted the following comments from their members:</p> <p>"If one has to choose among the evils of power generation, wind and solar generation must be the lesser of these. It seems that they are looking at the bats and birds in the environmental scoping."</p> <p>"Let me start by saying I am all for green power - I love solar."</p> <p>Some comments from members of the association.</p> <p>In more detail –</p> <p>"If the wind farms go ahead, the outcome for Uitkomst 23 and Boebezaks Kraal 40 Paternoster will be negative.</p> <p>"The Uitkomst 23 portion is west of the dirt road, if they place a tower at the closest point it will be less than 1 km from us.</p> <p>"At this distance you will get a flicker effect in the morning as the sun rises and possibly noise, let alone all the bats that will get whacked."</p> <p>"We do have plenty of wind so I support harvesting the wind. However, in the light of many thousands of square km of agricultural land with few houses in the area available, I don't see the logic of putting it so close to a village."</p>	<p>Ben Rootman Chairperson</p> <p>Long Beach Home Owners Association</p> <p>Letter: 03-04-2018</p>	<p>It is noted that the Chairperson's submission is made on behalf of the Long Beach Home Owners Association.</p> <p>It is noted that impacts on the farms Uitkomst 23 and Boebezaks Kraal 40 in Paternoster would be negative.</p> <p>The key points raised, which are to be addressed in the EIA include:</p> <ul style="list-style-type: none"> » Shadow flicker has been identified in the Visual Scoping Study (Appendix L) as a potential impact and will be considered further in the Visual Impact Assessment to be undertaken in the EIA phase. » The location of the site relative to the village. <p>The main objections listed by the Long Beach Home Owners Association has been recorded and are noted as part of the EIA process.</p>

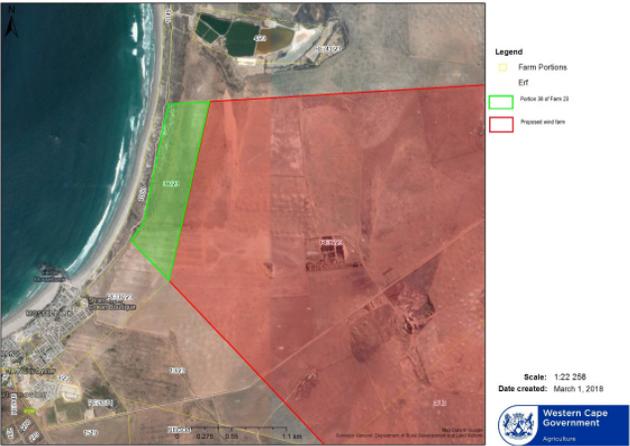
NO.	COMMENT/ISSUE RAISED	RAISED BY	RESPONSE
	<p>These are the two main objections to the proposed development. The Long Beach Home Owners Association believes that these objections will be adequately addressed. We look forward to your comments.</p>		
63.	<p>La Baleine (Pty) operating from Stands 1046, 1048, 1049, 1050, 1052, 1053,1054,1055 and 1058. Company Registration Number: 206/003847/07</p> <p>La Baleine (Pty) Ltd manages the following properties on behalf of their owners (www.labaleine.co.za)</p> <p style="text-align: center;">1046, 1048,1049, 1050, 1052, 1053, 1054, 1054 and 1055.</p> <p>These properties have magnificent views and overlooks the Paternoster Bay. La Baleine had a long successful history and is the No 1 rated Self Catering property both on TripAdvisor and booking.com (www.booking.com/hotel/za/la-baleine.en-gb.html?aid=356980;label=gog235jc-hotel-XX-za-laNbaleine-unspec-za-com-L%3Aen-O%3AosSx-B%3Aasafari-N%3AAXX-S%3Abo-U%3AAXX-H%3As;sid=a726eb34908f2dbf862d454504dbf11c;dist=0&sb_price_type=total&type=total&).</p> <p>The business is in operation since 2001 and during 2017 were occupied for guest nights.</p> <p>(i) The proposed project will change the view from the La Baleine properties dramatically. Currently the property overlooks the bay together with the West Coast landscape on the east;</p> <p>(ii) Instead of a peaceful view, this will be replaced with moving turbines and flashing lights at night, this will damage the business enormously. Many of our international guests have a</p>	<p>Cornelia Lewis General Manager</p> <p>La Baleine Beach House Collection</p> <p>Reply Form & Letter: 03-04-2018</p>	<p>It is noted that the I&AP represents self-catering properties located in Paternoster.</p> <p>i) A Visual Scoping Study (Appendix L) has been undertaken to identify the potential impacts of the Boulders Wind Farm, a potential visual impact on Paternoster has been identified. This impact will be assessed further as part of the Visual Impact Assessment to be undertaken as part of the EIA phase.</p> <p>ii) The impact on businesses within the area will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of tourism trends and economic issues within the area.</p> <p>iii) It is noted that 50% of the guests who visit La Baleine properties are international guests.</p>

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	<p>very negative perception towards Windfarms and this will most certainly affect tourism for our Establishments.</p> <p>(iii) 50% of our guests are international guests</p>		
64.	<p>1. I was a registered Interested and Affected Party when Aurecon and Terramanzi was busy with the EIA process and somehow was de-registered. I want to re-register now as an I&AP because I am a neighbouring farm to this project. My Details follow below.</p> <p>2. Visual and Noise Impact: The West Coast One Wind Farm is situated nearby and the property and houses of Klipheuvel Farm was evacuated due to the turbines visual and noise impacts. At night the lights flickering would be very irritating and I do not know at this stage how it would affect myself and my farm workers? And the same for the noise impacts, because if I get closer to the turbines the noise would have an effect. The distance of turbines to the nearest residential area of other WEF projects was 1.2 kilometers, what is the Boulders WEF's proposed distance?</p> <p>3. Water Resources: We do not have natural water supplies and use mainly Municipal water, which was four times interrupted this year for 2 days or more. Where will this project get its water from and how will it influence our supply? Every December our water supply is under great pressure because of the increase in consumption over the holiday period and again our supply was interrupted every week. We are currently under heavy water restrictions and our water supply could suffer from another project like this! If our water supply gets interrupted or we reach day zero, will the wind farm be held responsible? I suggest that all building projects be cancelled till we can overcome this dreaded drought, that's the worst in 100 years.</p> <p>4. Roads: How will the gravel road from Vredenburg to Stompneusbay (P2160) be maintained, because it will carry</p>	<p>Danie Kotze Adjacent Landowner</p> <p>RE and Portion 4 of Boebezaks Kraal</p> <p>Letter: 03-04-2018</p>	<p>It is noted that the I&AP is an adjacent landowner.</p> <ol style="list-style-type: none"> 1. In terms of Regulation 41(2)((b)(ii), of the EIA Regulations 2014, as amended, Danie Kotze was automatically registered as an I&AP as he is an adjacent landowner. A meeting was held with the landowner on his farm on 09 March 2018. 2. A Visual Scoping Study (Appendix L) and a Noise Scoping Study (Appendix K) has been undertaken as part of the Scoping report. The Noise Scoping study has identified noise sensitive developments located within the project site and the surrounding areas which may be impacted by the noise from the wind farm. A 500m exclusion buffer has been applied by the specialist to all noise sensitive developments and these must be observed, as a minimum, by the developer. 3. The water supply to the Boulders Wind Farm will be provided by the Saldanha Bay Local Municipality or through the use of boreholes. The current restrictions and challenges in terms of water supply in the area is noted. 4. Should the Stompneus Bay gravel road be used during the construction of the Boulders Wind Farm, it will be the responsibility of the developer to repair the damages as they are incurred during the construction phase. A Traffic Impact Assessment will be undertaken during the EIA phase which will assess the road network within the area and consider the development of the wind farm on the network. 5. None of the construction workforce will occupy the site outside of working hours. The only exception will be security personnel who will be on the site at night. Construction workers will reside in the local towns. During the focus group meeting held with

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	<p>heavy loads, many trucks and other vehicles involved in this project. If not properly maintained who will be held responsible?</p> <p>We already struggle with the West Coast District Municipality to maintain the road, which are 95% of the time in a horrible condition. Our vehicles get a beating on these roads every day as it is and no one will take responsibility for the damages. The WCDM do not have the funds to maintain this road according to them, and how will this be overcome?</p> <p>5. Security: This is a big concern because my farming activities mainly consist of Sheep and Cattle farming and we already have a big problem with theft of livestock. You will have security at the entrances of the farms included in the project, but we as neighbours won't. How will we be protected against the rise in activity and unknown people claiming to be part of the project. At night who will be responsible for securing my livestock and assets? If any livestock loss or theft occur, Boulders Windfarm will be held responsible.</p> <p>6. Wireless Internet: I have a lease agreement with 2 wireless internet companies, with wireless access points on Kasteelberg Koppie on my farm. Will the turbines influence this signal and if so how will it be rectified? I will register the companies involved as I&APs.</p> <p>7. Heritage: I have a Heritage resource on my farm (KBS) Kasteelberg and there is a 3,5 km no wind turbine buffer zone around it set by Heritage Western Cape and no turbines within 2km on both Western and Eastern Side of the Stompneusbay gravel road(P2160).</p> <p>If you are not aware, I was part of The West Coast One WEF project but was excluded from the project due to a 3,5 km no wind turbine buffer zone around Kasteelberg (KBS) set by Heritage Western</p>		<p>Mr. Kotze on 09 March 2018, he explained that the construction workers of the West Coast One Wind Energy Facility gained knowledge of the layouts of the farms which created an opportunity for access of the properties without the farmer's notice.</p> <p>6. Modern wind turbine blades are typically made of synthetic materials, such as resins, which have a minimal impact on the transmission of electromagnetic radiation and internet signals.</p> <p>7. The buffer distances around Kasteelberg and the P2160 are noted. The buffers recommended by the heritage specialist for the Boulders Wind farm project are in line with buffers agreed in consultation undertaken by ACO with Heritage Western Cape. The archaeological specialist (Appendix 1a) has recommended a 2km buffer on the western side of the Kasteelberg feature and a 1.5km buffer on the eastern side for the protection of the feature. A buffer of 250m has been applied on either side of the Stompneus Bay road for preservation purposes. Further consultation with Heritage Western Cape will be undertaken as part of the EIA process to confirm and finalise the exclusion buffers required.</p>

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	<p>Cape (HWC Case Number 1152) and no turbines on both the western and eastern side of the Stompneusbay gravel road(P2160), and this resulted in my farm being excluded from the WEF resulting in a huge loss of income for me, my family and farmworkers.</p> <p>This means that more than half of the Vredenburg Windfarm (Boulders) WEF Project (DEA ref. no. 150302) will be excluded by Heritage Western Cape due to the 3,5 km buffer zone around Kasteelberg (KBS) and no placement of turbines within 2 km on both the western and eastern side of the Stompneusbay gravel road(P2160).</p> <p>The Heritage impact assessment of ACO for the Boulders windfarm varies drastically from the HIA for West Coast One Wind Farm also done by them?</p> <p>Heritage Western Cape proposed Kasteelberg (KBS) as a provincial heritage site with huge archeological impacts and sense of place with views of 360 degrees. I rejected this nomination due to security reasons.</p> <p>My conclusion in this regard are, if any wind turbines from Boulders wind farm be approved within this 3,5km buffer zone from Kasteelberg (KBS) and within the 2km Stompneusbay gravel road(P2160) buffer zones on both western and eastern sides of P2160, I will take legal action against Heritage Western Cape, its Governing Authorities and the Department of Environmental Affairs for Loss of Income, tort and victimisation.</p> <p>My lawyer will send a Legal Letter to Heritage Western Cape and the Department of Environmental Affairs informing them of above matter.</p>		

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65.	<p>Our concerns as previously stated still stand:</p> <ul style="list-style-type: none"> • The proposed Project (or Boulders Windfarm) is located in the immediate vicinity of the existing West Coast 1 windfarm. In its current form, the Project would cause significant interferences with West Coast 1 operating conditions; • The proximity of the Project wind turbines with West Coast 1 wind turbines would reduce the energy production of West Coast 1: <ul style="list-style-type: none"> ○ Part of the wind energy would be captured by Project wind turbines, and would contribute to the reduction of the overall energy production of West Coast 1 Project; ○ Wake effect generated by the close Project wind turbines would increase the stress on West Coast 1 wind turbines and therefore accelerate their wear and tear (increasing further operating costs); • There is still unclarity on the Project grid connection conditions: <ul style="list-style-type: none"> ○ Where is (are) the envisaged location(s) of the windfarm Project substation? ○ If the case, where does the new Grid Connection to be built tie in Eskom 132 KV network? Which are the envisaged route(s) and do these go through West Coast 1 windfarm? With which proximity of West Coast 1 wind turbines? ○ Which is(are) the envisaged collector cable route(s) from the Project wind turbines to the Project substation? 	<p>Tebogo Movundlela CEO</p> <p>Aurora Wind Power</p> <p>Email: 3-04-2018</p>	<p>It is noted that the I&AP is representing the interests of the West Coast One Wind Energy Facility.</p> <ul style="list-style-type: none"> » It is noted that the development of the Boulders Wind Farm directly adjacent to the existing operational West Coast One Wind Energy Facility could interfere with the operating conditions and/or energy production of the facility. All planning regulations restricting the placement of wind turbines will be followed. » The grid connection from the Boulders Wind Farm will be assessed as part of a separate Basic Assessment process, which will consider feasible alternatives for the 132kV power line route. The details of the grid connection routes are therefore not available as part of this EIA process being undertaken for the Boulders Wind Farm. » It is noted that Aurora Wind Power requests that those constraints placed on the West Coast One Wind Energy Facility also be considered and applied by the DEA for the Boulders Wind Farm.

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	<ul style="list-style-type: none"> The constraints placed by the Department of Environmental Affairs need to be consistent for all wind farms, given the Project its current form, certain concessions would need to be made for the Project. 		
66.	<p>I am the owner of Portion 36 of Farm 23 which shares a boundary with the proposed project - see attached map (below):</p>	<p>Deon Brand Adjacent Landowner</p>	<p>It is noted that the I&AP is an adjacent landowner.</p>
		<p>Portion 36 of Farm 23</p> <p>Email: 03-04-2018</p>	<p>It is noted that the adjacent landowner has future plans to construct a house on the property directly adjacent to the project site.</p>
	<p>Although there is no development on the farm at the moment, I am entitled to construct a house together with a house for a manager. The intention was to build a personal home here for my family, but it is right next to the turbines.</p> <p>i) The proposed project borders on the farm making it impossible to use it for the purpose intended. The land was sold to me by</p>		<p>i) It must be noted that the property associated with the project site, which borders Portion 36 of Farm 23 has been identified through the scoping process as part of the area within the site considered to be less favourable for the development of the wind farm. The property owned by the adjacent landowner is therefore not located adjacent to the preferred development area which the developer is focussing on for the placement of the facility layout.</p> <p>ii) A Visual Scoping Study (Appendix L) and a Noise Scoping Study (Appendix K) has been undertaken as part of the Scoping report. These reports have identified night lighting of the facility and the noise generated by the turbines as impacts to be further considered and assessed in the EIA phase.</p> <p>iii) It is well known that majority of health impacts from wind farms are caused by the noise of the wind turbine generators. These impacts are addressed in the noise report. With regards to electromagnetic impacts, wind turbines are known for low EMI emissions, and there are no known health impacts of electromagnetic fields over and above those caused by modern electrical appliances such as portable radios, fluorescent lights and television broadcasting.</p> <p>iv) The impact on property values will be considered as part of the Social Impact Assessment to be undertaken during the EIA</p>

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	<p>the adjacent owner who now wants to participate in a project to build the project there;</p> <p>ii) The closeness of the high structures with moving turbines and flashing lights;</p> <p>iii) Potential health impact of noise, flickering red lights and close presence of electric generators;</p> <p>iv) The project will make the land valueless.</p>		<p>phase. This assessment will also consider empirical data in terms of property trends and values within the area.</p>
67.	<p>Erf 1050 Paternoster (Pty) Ltd (the "Company") is a developer which owns 2 development properties next to the project (see attached maps):</p> <p>Remainder Portion 37 of Farm 23; and</p> <p>Stand 1518 which had been sub-divided in 107 residential erven</p>	<p>Deon Brand Adjacent Landowner</p> <p>Erf 1050</p> <p>Email: 03-04-2018</p>	<p>It is noted that the I&AP is property developer and landowner in the area. The landowner plans to develop between 300 and 400 cottages together with tourism infrastructure on this land.</p>
			<p>The reasoning for the undertaking of the proposed development is noted as well as the benefits thereof. The specific concerns in respect of the development of the new residential/tourism site are noted. It has been requested for the I&AP to provide a copy of the application for Environmental Authorisation for the extensive residential area development to the Boulders EIA project team in order for the details of the application to be adequately considered by the wind farm EIA specialists. The property considered for the development of the development by the I&AP is located to the west of the project site, with the affected property Uitkomst RE/6/23 being the closest to the area proposed for the resort. As per Chapter 7, Section 7.4 of the Scoping report a sensitivity analysis was undertaken in order to identify the area with the highest potential for development within the project site. Considering the location of the area proposed for the development of a resort in relation to the preferred development area within the project site, the minimum distance between the two areas will be 3.8km.</p>
	<p>The Company starts with a development of between 300 and 400</p>		<p>The impact on tourism within the area will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of</p>

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	<p>cottages together with other tourism infrastructure on this land. The total value of the project is estimated between R800 – R1 400 million.</p> <p>The Company decided to undertake this development as Paternoster is offering considerable development potential as a tourism destination which provide a large source of work and economic input for the area.</p> <p>The position of a Wind Farm next to Paternoster is a major concern. Whilst the Wind Farm can be built in many other suitable areas, Paternoster cannot be replicated anywhere else. It seems absurd to damage such a valuable tourism resource by a facility which can be built in many other places.</p> <p>Further concerns:</p> <ul style="list-style-type: none"> (i) Extreme closeness of project to Paternoster. It is about 500m from Paternoster's Northern Border and borders on the development land of the Company; (ii) The Company's development is right next to where the project is proposed - see attached maps, it will therefore greatly affect the success and value of the development; (iii) The visual impact of the high structures with moving turbines and lights; (iv) The visual change from a calm West Coast landscape to one which is being dominated by huge moving turbines close by; (v) The Company's project will have a big economic impact on the town which will be lost; (vi) The Company will also suffer major financial losses due to the loss in property value. 		<p>tourism trends within the area.</p> <ul style="list-style-type: none"> i) It must be noted that the property associated with the project site, which is located in close proximity to the Remainder Portion 37 of Farm 23 and Stand 1518 has been identified through the scoping process as part of the area within the site considered to be less favourable for the development of the wind farm. The property owned by the adjacent landowner is therefore not located adjacent to the preferred development area which the developer is focussing on for the placement of the facility layout. ii) It has been requested for the I&AP to provide a copy of the application for Environmental Authorisation for the extensive residential area development to the Boulders EIA project team in order for the details of the application to be adequately considered by the wind farm EIA specialists. iii) A Visual Scoping Study (Appendix L) has been undertaken as part of the Scoping report. The report has identified that the night lighting of the facility could potentially create a negative impact. These impacts will be further considered and assessed in the EIA phase. iv) An impact on the sense of place to the area (including the Paternoster town) has been identified by the heritage, visual and social specialists as part of the Scoping report. The sense of place will be further assessed and ground-truthed during the EIA phase and within the impact assessment specialist reports. v) The potential economic benefits of the proposed development to be undertaken by the I&AP is noted, as well as the potential for loss due to the development of the Boulders Wind Farm. vi) The impact on property values will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in

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68.	<p>Thank you for providing the opportunity to comment on the proposed Boulders Wind Farm project. Of all the previous applications for the construction of wind farms in the proposed area, your team should be commended for the clearly impressive effort that has been made to appraise the DEA and the IAP's of the full ramifications of the project. The reports and studies were for the most part informative, interesting and educational. Good luck with finding a sound balance between the unquestionable need to greatly increase the contribution of renewable energy to the national energy mix and minimising the negative impacts which all human-centered developments inevitably seem to have.</p> <p>We gather from the documentation that the scoping study is a high level assessment which prepares the way for the more detailed EIA phase. Presumably, the IAP's will be informed of key developments during the EIA and will be invited to comment on the final document before its submission as part of the project approval process.</p> <p>It is also vital that a clear indication of the proposed location of the wind turbines on a clear satellite image of the area be submitted to the IAP's as soon as it becomes available. The image or map should include a clear overlay of the road layout / property boundaries to allow local residents to locate their position in relation to the turbines. This is especially important for residents of Britannica Heights, who are certainly the most compromised by the development. There are about 44 small-holding plots in Britannica Heights affected by the development, primarily by visual and potential noise impact. A clear indication of the location of the turbines may serve to allay some of the concerns of the residents.</p>	<p>Matthew Marx and Mary Ralphs</p> <p>Britannica Heights Resident</p> <p>Letter: 03-04-2018</p>	<p>terms of property trends and values within the area.</p> <p>It is noted that the I&AP is a resident of Britannica Heights.</p> <p>The EIA report will include more detailed project information and ground-truthed specialist findings which will be made available for a 30-day review period during the EIA phase.</p> <p>The layout of the facility will be made available for review and comment as part of the EIA report in the EIA phase. The layout will include all infrastructure associated with the development footprint, including the property boundaries. As part of the sensitivity analysis undertaken in the Scoping report the comments received from the Britannica Heights Residents were considered which relates to the visual intrusion on the line of sight from Britannica Heights towards Paternoster. This impact would not be mitigatable should the development proceed in that area. Due to the comments from the Britannica Heights residents and other environmental constraints and features located within the northern portion of the project site the southern portion was identified as having the highest potential for the development of the Boulders Wind Farm. The identification of the area with the highest potential for the development resulted in the southern section being identified as the preferred development area within which the development footprint (i.e. facility layout) will be located. The analysis therefore considered the visual impact on the Britannica Heights residents and has now avoided the area which would have created visual intrusion towards Paternoster.</p> <p>The Visual Impact Assessment to be undertaken in the EIA phase will make use of photo simulation in order to provide the reader of the report a visual representation of the wind farm within the project site.</p>

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	<p>Of equal importance is a projected image of the proposed wind farm in the vertical dimension. What will the wind farm look like from Britannica Heights for example? Before / after projections are essential.</p> <p>1. Preamble In many ways, St Helena Bay has suffered historically from a severe lack of vision in its development path. Gifted with a profoundly beautiful natural setting, the village itself has been a hodgepodge ribbon development of motley, unrelated areas ranging from fish factories (some operating, some derelict and some demolished - with their rubble still in place), large storage warehouses, nodal residential areas with architectural styles ranging from appropriate to terrifying and isolated retail areas varying from grimy to cheesy. The level of affluence follows the ribbon development, from the desperately poor in the informal settlement on the outskirts of Laingville to the desperately rich in the walled city of Shelley Point at the other end of the ribbon.</p> <p>In short, St Helena Bay presents as a series of rather jarring land use manifestations packed randomly alongside each other. The dominant employer has traditionally been the fish factories, but these appear to be somewhat in decline. Attempts to increase the appeal of the area to tourists has almost certainly been severely compromised by the ugliness of the human imprint on this otherwise beautiful area. At one point, local tourist brochures leapt from Paternoster straight to Velddrif, completely omitting St Helena Bay. Britannica Heights itself is somewhat unique in the area. The original area on the mountain ridge was allocated to limited residential development. The development was presented as a way to live in a largely unobtrusive manner in a "nature reserve" area. Plot sizes are no smaller than 1 hectare, with</p>		<p>1. Preamble The preamble of the area within which the project site is located is noted.</p> <p>2. Wind Farm Location As part of the project the developer has undertaken a site selection process in order to identify a project site that is both technically and environmentally suitable. The site selection process was undertaken in 2010 and a report regarding the findings of the site selection process has been included as part of Appendix O. Therefore, the site selection process has lead the developer to identify a feasible project site within the Saldanha area for the development of a wind farm.</p> <p>In terms of the turbines being used and the contracted capacity proposed for the Boulders Wind Farm, which is up to 140MW, up to 45 wind turbines is required, with a capacity of ~3.15MW each. In order to generate a contracted capacity of up to 140MW within the project site, and considering the characteristics of the project site larger wind turbines are required.</p> <p>It must be noted that none of the affected properties located within the project site are owned by the developer. Portions of the properties will be leased where the development footprint is located. In terms of the benefits associated with the development, the developer is obligated to establish a community trust which will use revenue from the wind farm for the upliftment of the communities located within a 50km radius of the site.</p>

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	<p>development limited to 2500 m² on each plot to retain most of the natural floral areas. No above ground services or plot boundary walls are allowed, thereby minimising restrictions to animal movement. The result is an area of human habitation with a surprisingly large population of small fauna.</p> <p>The ridge of the mountain top divides plots between those with a view over the bay towards Velddrif and those with a view over the farmland towards Paternoster. The latter view is one of St Helena Bay's best kept secrets. Without actually visiting Britannica Heights, visitors to St Helena Bay will not be aware of it. The ridge is about 160m above sea level. The view over the farmland towards the areas of ocean at Paternoster and Britannia Bay are breath-taking, particularly towards sunset. In summer, the sun sets over the sea at Paternoster and in winter it sets over the sea at Britannia Bay. The farmland undulates gently towards a low point in the valley, with Kasteelberg looking for all the world like a large dragon resting on the horizon. The land colours vary from various shades of brown and amber in summer, to various shades of green in winter.</p> <p>There is a clear opportunity to rethink the way the valley is utilised - preferably a way that capitalises on the natural beauty of the place, rather than introducing yet another jarring intrusion in the area. We have enough of those.</p> <p>2. Wind Farm Location</p> <p>Sadly, the area allocated to the proposed wind farm stalks across most of the area described in (1). The apparent obsession to fill the valley with wind turbines has repeatedly been questioned in previous IAF responses. It has been enlightening to learn of the exclusion zone imposed by the SAAF, as this provides part of the</p>		<p>It must be noted that Figure 2.1 indicates the extent of the Langebaan Air Force Base exclusion zone (18.5km buffer) within which no wind turbines are permitted and the project site located north of the exclusion zone. Whereas Figure 2.3 indicates the general area within which the project site is located.</p> <p>3. Social Impact / Economic Report</p> <p>The concerns about the national and international information included in the Social Scoping Report (Appendix J) is noted.</p> <p>It is noted that the methodology used in the Social Scoping report needs to consider the local context of the project site.</p> <p>It is noted that the consideration of the West Coast One Wind Energy facility as the baseline for Social Impact Assessment is considered meaningless. However, as the facility is located directly adjacent to the Boulders Wind Farm project site the trends experienced during the construction and operation phases are considered to be relevant to the development of the Boulders Wind Farm.</p> <p>It must be noted that the projections in the Social Scoping Study, are preliminary and more confirmed numbers will be provided during the EIA phase and reporting.</p> <p>The comment on the beneficiaries of the project noted. Yes, consultation with the indigenous local of the area has taken place during the review period which includes focus group meetings held on 22 and 23 March 2018. The focus group meetings were held with the Paternoster community, specifically the fishing community, representatives of the St</p>

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	<p>answer.</p> <p>It remains unclear why the development of wind farms cannot migrate north of the exclusion zone, parallel to the coast line. It seems inevitable that this has to be the direction of future wind farm development anyway, since the sea imposes a firm cul-de-sac on any future development in the valley. The increased length of the power line required to connect to the main substation has been cited as a cost burden, yet the same report notes (page 29) that the area "can afford a fairly long grid connection and still be very competitive".</p> <p>One is not surprised. Vredenburg Windfarm's justification presents power generation numbers that suggest an average wind farm operating factor of about 40%. The average in Germany is about 17% - and they are still viable. Is this project then exclusively about maximising profits? Where is the compromise? There are many miles of flat featureless land further north. Perhaps the wind speeds are a little less. Perhaps someone would have to pay for the power line. They could certainly make a tidy return by leasing it out to any further wind farm developments up north anyway. As these are next to no other human developments in much of the area, there are unlikely to be any IAP objections.</p> <p>The proposed wind turbines seem to be considerably larger beasts than those of West Coast One (94 MW from 47 turbines versus 140 MW from 45 turbines). West Coast One are presumably happy, so what is this difference about? Do the turbines need to be bigger because the developer has elected to build them in a valley – or is this about squeezing out more profits at the expense of the local environment?</p>		<p>Helena Bay Community and the farmworkers who work on the affected properties (refer to Appendix C).</p> <p>The comment on the Social Scoping Study and the focus on Paternoster, with less focus on Britannica Heights is noted.</p> <p>4. Visual / Noise Impact As part of the sensitivity analysis undertaken in the Scoping report the comments received from the Britannica Heights Residents were considered which relates to the visual intrusion on the line of sight from Britannica Heights towards Paternoster. This impact would not be mitigatable should the development proceed in that area. Due to the comments from the Britannica Heights residents and other environmental constraints and features located within the northern portion of the project site the southern portion was identified as having the highest potential for the development of the Boulders Wind Farm. The identification of the area with the highest potential for the development resulted in the southern section being identified as the preferred development area within which the development footprint (i.e. facility layout) will be located. The analysis therefore considered the visual impact on the Britannica Heights residents and has now avoided the area which would have created visual intrusion towards Paternoster.</p> <p>The comment of the noise studies at ground level is noted, as well as the shadow flicker considered in the Visual Scoping Study (Appendix L). It must be noted that the layout of the facility to be provided in the EIA report, and the assessment thereof will provide more confirmed information on the noise and visual impacts and will consider the noise and visual impacts on Britannica Heights.</p>

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	<p>It appears that certain investors bought up farmland in the area on the premise that wind farms would be established here. Is the obsession with the proposed site more to do with ensuring that these investors are placated? Who really benefits by locating the wind farm in this valley? The distribution of projected returns would certainly make interesting reading.</p> <p>Figures 2.1 and 2.3 in the scoping report appear to be inconsistent. The circled area in Fig 2.3 is much further south-east than the area demarcation in Fig 2.1. The circle, in fact, appears to border on Vredenburg. The circle on the DEA&DP map lies over a "feasible / preferred" area. The site in Fig 2.1 lies largely in a "restricted / feasible" zone. Any comments?</p> <p>3. Social Impact / Economic Report</p> <p>This report is hampered by drawing dubious conclusions about the local impact of the proposed wind farm based on sweeping national and international studies. This is particularly problematic where visual and noise impacts are concerned.</p> <p>Assessing the potential impact on property values and tourism is admittedly challenging, but to suggesting that people go on holiday to look at wind farms is pushing it a bit. This is meant to be an unbiased study. Furthermore, making deskbound assessments using computer models will hardly produce believable results. The methodology clearly needs a re-think in order to make it locally relevant.</p> <p>The use of the West Coast One wind farm to draw conclusions about property values and tourism impact is meaningless since this wind farm is rather remote from any residential / tourist sites. It is</p>		<p>The impact on property values within Paternoster will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of property trends and values within the area.</p> <p>It is well known that majority of health impacts from wind farms are caused by the noise of the wind turbine generators. These impacts are addressed in the noise report. With regards to electromagnetic impacts, wind turbines are known for low EMI emissions, and there are no known health impacts of electromagnetic fields over and above those caused by modern electrical appliances such as portable radios, fluorescent lights and television broadcasting.</p>

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	<p>rather more useful as basis for studying local employment impact and assessing the potential wind farm operating factor – neither of which appears to have been exploited.</p> <p>The report projects that the R2.5 billion project will create 250 temporary jobs during the construction phase. That's R10 million per temporary job. The project promises a paltry 28 permanent jobs. What an impact! To suggest that this is a positive impact is laughable. Promoting a different, more labour-intensive model for local agriculture or promoting more tourism will surely create far more "permanent" jobs far more cheaply. By all means extol the virtues a wind farm but do acknowledge its deficiencies where these are so obvious.</p> <p>The benefits of the project to the most needy part of the local population are not evident in the study. The beneficiaries appear to be Vredenburg Wind Pty, the local farmland investors, the local municipality perhaps and of course farmers who employ labour at below R20 per hour. Has there been any consultation with the more indigent part of the local community? Has any share of the profits from the wind farm been allocated to improving the lot of the community?</p> <p>The relatively short lifespan of the project, namely 20 years, is also unimpressive.</p> <p>The report focuses heavily on Paternoster, citing the notion that the new development will have a negligible impact on tourism. This is not surprising, since the only focus in Paternoster is the beach-front and the sea. The proposed wind farm lies fairly far away in the opposite direction. Had the developers proposed the construction of an off-shore wind farm in the middle of Paternoster's main</p>		

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	<p>attraction, be assured that the residents would have squealed as loudly as we are here at Britannica Heights, where the nearest demarcated development boundary is within 1 km from our residences (Davids Fonteijn farm).</p> <p>4. Visual / Noise Impact</p> <p>Britannica Heights must be unique in relation to the proposed wind farm in that the residences are located on an elevated ridge, some 160 meters above sea level. This places us at more-or-less eye level with the swept area of the rotating blades of many of the turbines. Noise studies conducted at ground level in relation to the turbines are almost certainly meaningless in this context. Aspects of the visual impact assessment may also need review, especially the impact of shadow flicker near day end.</p> <p>In terms of the noise and potential health impact on property values, it must be acknowledged that despite the claims of "scientific" studies that indicate no or little impact, perceptions matter in the minds of prospective property buyers. The advent of giant wind farms in the world was accompanied by frenzied fear of noise and health impacts. They might not be justified, but are sure to play a lingering role in the mind of a prospective buyer.</p>		
69.	<p>Strandloper Ocean Boutique Hotel is on the northern border of Paternoster less than 500m from the site where the project is proposed.</p> <p>A number of our rooms overlooks the area where the project is proposed and will now be in close range.</p> <p>(i) Strandloper Ocean serves the international Five Star Market. The hotel's guests are typically from European Cities who visit</p>	<p>Abraham Mouton General Manager</p> <p>Strandloper Ocean Boutique Hotel</p> <p>Reply Form & Letter: 1-04-2018</p>	<p>It is noted that the I&AP is a representing the interests of the Strandloper Ocean Boutique Hotel.</p> <p>(i) The rating and the composition of the Hotel's guests is noted. (ii) The occupancy of the Hotel is noted. (iii) The sense of place, undisturbed nature and the value thereof for the Hotel is noted. (iv) The property of the project site closest to the Hotel is the farm Uitkomst RE/6/23. It must be noted that the section of the</p>

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	<p>the hotel to get away from the busy cities they live in;</p> <p>(ii) Our occupancy during the European winter from November to March is approximately 92 % average, more than 80% of which is from the above group;</p> <p>(iii) The undisturbed nature together with the views over the typical West Coast landscape is peaceful and provides a relaxing environment for guests;</p> <p>(iv) The proposed project will change this greatly. The hotel view will now change to high structures more than 120m high with moving turbines and flashing lights in very close range;</p> <p>(v) The hotel is in the process of being extended. Investment is considerable and it provides jobs to approximately 50 people;</p> <p>(vi) The proposed project will destroy the business of the hotel.</p>		<p>project site located closest to the Hotel has been identified as the area that is less favourable for the development of the wind farm (refer to Figure 7.19). The Visual Scoping Study (Appendix L) has identified shadow flicker and the facility lighting as a potential visual impact. These impacts will be assessed further and ground-truthed in the EIA phase.</p> <p>(v) The extension, investment and job opportunities provided by the Hotel is noted.</p> <p>(vi) In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for impact to property values, tourism and economic issues (which will focus on empirical data and tourism trends within the area considering the construction and operation of the West Coast One Wind Energy Facility). The information contained in this comment will be referred to the specialist for consideration.</p>
70.	<p>Thank you for supplying me with the CD for the Boulders Wind Farm Project.</p> <p>The West Coast Bird Club after examining the report understands the reason why the application is situated on the West Coast Peninsula. The wind quality and that Eskom has constructed the Fransvlei – Aurora 132kV to receive power specifically produced by renewable energy facilities on the peninsula, example West Coast No.1, which is underutilised.</p> <p>Statement in Scoping Report "The location of the facility directly adjacent to an operational wind farm (West Coast No.1) has demonstrated the area to be receptive to wind farm development. The site borders the operational facility and is viewed as a natural extension of the</p>	<p>Keith Harrison Chairperson</p> <p>West Coast Bird Club</p> <p>Letter: 01-04-2018</p>	<p>It is noted that the I&AP represents the West Coast Bird Club. It is noted that the I&AP received a CD copy of the Scoping report at the focus group meeting held with the West Coast Biosphere Reserve and the West Coast Bird Club on 08 March 2018.</p> <p>The confirmation of the need for the development within the project site is noted.</p> <p>» Birding problems</p> <p>* The project site being considered as part of the application has been identified by the developer for the development of a wind farm with a contracted capacity of up to 140MW. A 'funnel-down' approach has been applied in the EIA process which includes the consideration of the entire project site for the identification</p>

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	<p>facility."</p> <p>1. Birding problems,</p> <ul style="list-style-type: none"> • Why is the application for 5084 ha when only 45 turbines are required? This indicates that more projects can be added later. • Current maps of proposed WEF and PVSEF developments indicate that renewable energy facilities could blanket the area affecting the bird population and in passage. • If Boulders is constructed adjacent to West Coast No.1 the current WEF of 47 turbines would become a WEF of 92 turbines, doubling the cumulative effects. <p>Mitigation would be to have a 3 kilometre buffer zone between any two WEFs. Currently from "Wind Energy Impacts upon Birds in South Africa" of 4.1 fatalities per turbine per year, there could be 192 annual fatalities rising to 377 annual fatalities in a small area, 136 of which would be raptors for the two WEFs.</p> <ul style="list-style-type: none"> • The AIA Report often mentions Cape Cormorants who generally fly only over water and along rivers. Nightly tens of thousands of Cape Cormorants fly from their feeding grounds off Paternoster to roost in the Berg River Salt Pans and are at risk from the Boulders project. They fly round Paternoster Bay and if the wind is in the North thick Sea Fog comes in, if this happens on the St. Helena Bay shore the Cape Cormorants fly round the edge of the fog. But at Paternoster this is impossible due to the high ground being next to the shore (Second Mussel Bank) and Groote Paternoster is directing out to sea, so they have to turn back into the oncoming birds and become disoriented, there is chaos as they make to fly near the Oyster Farm, although not in the application, surrounding areas are 		<p>of a smaller development area in the site which is considered as containing the area with the highest potential for development (i.e. preferred development area). Following the Scoping phase the developer designs a facility layout (i.e. development footprint) within the preferred development area which considers the visual and noise sensitivities and avoids the on-ground sensitive features. It is not the intention of the developer to utilise the remaining sections of the project site for further wind farm development, but rather to identify the best possible location for the development of a wind farm within the larger project site.</p> <ul style="list-style-type: none"> * It must be noted that an exclusion zone of 18.5km around the Langebaanweg air force base has been considered for the area within which no turbines may be placed due to radar issues. Please refer to Figure 2.1 for an illustration of the exclusion zone. * The potential for cumulative impacts has been identified in the Scoping report and the specialist studies undertaken in the Scoping phase. The cumulative impact will be further assessed as part of the EIA phase and will include specialist input. <p>The proposed mitigation measure of a 3km buffer between two wind energy facilities is noted. It is requested that the I&AP provide further justification for the perceived benefit to creating a corridor between groups of turbines, rather than consolidating turbines in one group. The rationale would be relevant for consideration by the Boulders Wind Farm specialist consultants.</p> <ul style="list-style-type: none"> » The risk to Cape Cormorant collisions is noted, and collisions of

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	<p>and if turbines and cabling are present there will be collisions.</p> <p>Mitigation – No Turbines to the West of the Paternoster / St. Helena Bay gravel road.</p> <ul style="list-style-type: none"> • Electrical, <ul style="list-style-type: none"> ○ All cabling where possible must be underground or protected with bird deflectors. ○ Security lighting should be motion activated and the beams directed downwards so as not to attract insects and night feeding insectivore bird species. ○ All fences should have bird deflectors as protection for low flying species. ○ Has Hybrid technology been considered for the close by villages Paternoster and St. Helena Bay so that all members of the population can continuously receive a benefit from the Boulders Project? • Sound, <p>There will be sound generated by the increase in turbine numbers for the human population, but latest research has indicated ground nesting bird species also are affected and produces smaller clutches and smaller offspring under turbines.</p> <p>2. Labour,</p> <p>The Boulders Project is situated within the Saldanha Bay Municipality and all semi-skilled and unskilled labour must be recruited from Paternoster and St. Helena Bay, and are able to prove that have been resident for 5 years in the SBM, or on the Voter Roll.</p>		<p>birds with the wind farm infrastructure has been identified as a potential impact in the Avifauna Scoping Study (Appendix F). The impact will be considered further in the EIA phase by the avifauna specialist.</p> <p>The proposed mitigation measure is noted and will be considered by the developer in their design of the facility layout.</p> <ul style="list-style-type: none"> » Electrical <ul style="list-style-type: none"> * It is noted that it is preferred for cabling to be placed underground. This will be possible for the cabling between the wind turbines, however not for the 132kV power line required to connect the facility to the national grid. * It is noted that all fences should have bird deflectors for the protection of low flying species. This will be considered by the developer. * Hybrid technology is not being considered as part of this application. It must be noted that the Boulders Wind Farm will be bid into the DOE's REIPPP programme with the main aim of evacuating the electricity into the national grid. * The impact of noise on ground nesting bird species and their offspring is noted. This will be considered further in the Avifaunal Impact Assessment. » Labour <p>It is noted that all labour (semi-skilled and unskilled) must be sourced from Paternoster and St Helena Bay. This will be considered by the developer.</p> <p>The use of locally trained teams for the removal of natural and alien vegetation will be considered by the developer.</p>

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	<p>For removal of natural and alien vegetation, there are available local teams trained by local NGOs for example Cape West Coast Biosphere Reserve Co.</p> <p>3. Traffic,</p> <ul style="list-style-type: none"> • All vehicles used by developers, contractors and sub-contractors should be registered with the Vredenburg Traffic Department so that a portion of the license fee can be used for road infrastructure maintenance. • All heavy and oversize loads must not be brought through Vredenburg High Street, and should use the R27/R399 route. • Where is the excavated material from turbine foundations and internal roads to dispose of? What amount is expected to be generated? 		<p>» Traffic</p> <ul style="list-style-type: none"> * The proposal that all vehicles used by the developers, contractors and sub-contractors be registered with the Vredenburg Traffic Department is noted. * The use of the road network within the surrounding area will be considered as part of the Traffic Impact Assessment to be undertaken in the EIA phase. * The disposal of the excavated material for the turbine foundations will be undertaken at an appropriately licensed waste disposal facility. The amount of excavated material can only be provided once the layout of the facility is available. The amount of excavated material will be confirmed in the EIA report.
71.	<p>Good day my interest is from a business side, as the chairperson of the Women in Construction and also a local business women currently participating in the Women in Energy programmes of National Government in their quest to uplift and elevate people in business in these new markets.</p> <p>With the new guidelines on projects I am keen on becoming a local BEE player in this project.</p>	<p>Zharon Damonse General Manager</p> <p>Sea Breeze Community Development</p> <p>Email: 3/04/2018</p>	<p>Zharon Damonse is registered as an I&AP on the project's database. The interest of the I&AP on the Boulders Wind Farm is noted.</p>
72.	<p>I have various interests in Paternoster and will also register these separately as they are all affected in different ways. This registration should however be read together with the individual registrations.</p> <p>The concerns I am listing here in respect of the Scoping Report consist of the following overarching issues:</p>	<p>Deon Brand Interested & Affected Party / Adjacent Landowner</p> <p>Laureate Private Resorts</p>	<p>The interests of the I&AP in the Boulders Wind Farm is noted.</p> <p>1. Bias and lack of information 1.1 The Scoping report aims to identify the potential issues expected to occur with the development of the Boulders Wind Farm, which includes both potential positive and negative impacts associated with the development of the wind farm. The potential impacts identified and included in the Scoping</p>

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1. 2. 3. 4. 5. 6. 7.	Bias and lack of information Sense of Place of Paternoster Tourism in Paternoster Economic impact of proposed project on Paternoster Property values in Paternoster Proximity and scale of project relative to Paternoster Bird Life	Letter: 03-04-2018	report was sourced from independent specialist studies and is considered to be relevant to the development of the Boulders Wind Farm within the proposed project site. There is no bias included in the scoping report as all potential impacts have been included and considered and all environmental sensitivities within the project site appropriately mapped. The information in the Scoping report is provided in a clear and transparent manner.
1. 1.1. 1.2. 1.3. 1.4. 2.	BIAS AND LACK OF INFORMATION 1.1. The subtle message throughout the Scoping Report that this project would not cause any damage leaves one with the impression that this is not an objective research, but instead a one-sided motivation of the project; 1.2. A further concern is that the Scoping Report and its annexures consist out of more than 1000 pages which is very difficult to evaluate. Combined with the strong element of bias and the lack of information in respect of certain issues, it is not possible to comment sensibly; 1.3. Another major concern is that a biased document lacking important information is being presented to both the public and authorities as part of a process to put them in a position to make an informed decision. This is not possible. 1.4. The above concerns are compounded by a history of numerous previous attempts to build a windfarm close to Paternoster. These all failed or were abandoned. As a result of this it left the perception with the Paternoster public that this is just another attempt which will fail. A biased report is therefore being presented to a complacent public. SENSE OF PLACE OF PATERNOSTER		1.2 It must be noted that the EAP has provided the I&APs with all the relevant information as part of the Scoping report, which contains the relevant information as required by the EIA Regulations, 2014, as amended. 1.3 The Scoping report has been undertaken in accordance with the EIA Regulations, 2014, as amended. The information presented to both the public and the authorities is the same. There is no difference in the reporting. It is requested that the I&AP provide comment on which sections of the report are considered to lack information so that the issue can be addressed, where relevant. 1.4 The previous applications undertaken for the development of a wind farm within the project site have not been completed, however none of the applications were rejected or refused. 2. Sense of place of Paternoster It is noted that the sense of place of Paternoster can be described as a number of forms, and it is focused on the preservation of its uniqueness. The importance of the sense of place in the West Coast to the I&AP is noted. It is noted that the I&AP has invested a large sum in order to ensure that proposed developments on the northern side of

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	<p>2.1. It is not easy to describe a town's "sense of place". Paternoster's sense of place however manifests itself in a number of forms as shown below;</p> <p>2.2. The West Coast's sense of place had been dramatically altered by development. As described below, Paternoster due to its history, managed to largely escape this. When development eventually came to Paternoster, it was done in a way with a strong focus to preserve its unique sense of place;</p> <p>2.3. Historically, the abundant fishing resources were the biggest catalyst for the start of the development of the West Coast. This resulted in the building of large fishing factories. Together with the farming on marginal land this greatly damaged the beauty of the rugged West Coast coastline and its Fynbos surroundings;</p> <p>2.4. The establishment of the Saldanha-Sishen project which started in the 1970s then brought many other industries. Whilst this became the driving force for the development of the West Coast, the "price" paid was that the West Coast was stripped from most of its natural beauty;</p> <p>2.5. Paternoster escaped the above as it remained largely undeveloped until around the year 2000. Interestingly the reason for this was the lack of the development of a proper road to the town. It remained isolated on the coastline until this time whilst only being about 15kms away from Vredenburg, the commercial hub of the area. This left us with something absolutely unique;</p> <p>2.6. Interestingly the people of Paternoster also contribute to this uniqueness. I believe that the reason behind this is that the isolation of the town played a big role in the cultivation of a unique approach to life. Although modern civilisation is changing this, it is very deep rooted</p>		<p>Paternoster do not change the sense of place for the area. The efforts by the community to preserve the sense of place in Paternoster is noted. The impact on property values and tourism within the area will be considered as part of the Social Impact Assessment to be undertaken during the EIA phase. This assessment will also consider empirical data in terms of property values and tourism trends within the area.</p> <p>It must be noted that the bias referred to by the I&AP, as per page 100 of the Scoping report (Section 5.8.1) has been taken out of context. The statement included was sourced from the Social Scoping Study (Appendix J, Section 3.3.1) and the full statement included reads "Commercial fishing and fish processing have played an important historic role within the local economies of coastal towns such as Saldanha and St Helena Bay. However, a decline in fish stock and other factors has, over the past two to three decades, resulted in a shift towards tourism. As part of this change a large number of...". Also this statement is not referring to the sense of place but rather social context and characteristics of the area. The statement included in the report specifically refer to the shift towards tourism due to a change in the fishing industry within the area. The statement also does not imply that tourism in the area is insignificant.</p> <p>The potential impact on the sense of place in the area (including Paternoster) has been identified by the heritage, visual and social specialists as part of the Scoping report. The sense of place will be further assessed and ground-truthed during the EIA phase and within the impact assessment specialist reports. The sense of place in the area and the assessment of the impact thereon is being considered and</p>

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	<p>and elements will remain for a long time;</p> <p>2.7. After the road between Vredenburg and Paternoster was tarred in an around 2000, Paternoster started to flourish as a tourism town – see paragraph 3 below. This was mostly due to its unique sense of place. This effect was so strong that property prices escalated at one point to more than 4 times higher than the surrounding towns – see also paragraph 4 below;</p> <p>2.8. As Paternoster's success was due to its unique sense of place, a concerted effort by many followed in order to retain this. It started off by the SBM laying down strict building guidelines, forcing new buildings to compliment the historic fishing village. As one of the first purchasers of land in Paternoster I can testify to the frustration of the architects when they encountered the strong enforcement of these guidelines. I believe that many thousands of man-hours were spent by Aesthetic Committees evaluating building plans and negotiating with the designing architects. This effort by many people paid off hugely leaving us with a town which is now synonym with its white buildings and distinctive character;</p> <p>2.9. Furthermore when I became aware of a development on the northern border of Paternoster which would damage its sense of place in a major way, I undertook an effort to purchase most of the land to the North of Paternoster with the specific objective to develop it in such a way that Paternosters unique sense of place will be retained in this part of the town. This investment was considerable and my family's investment currently exceeds R100 million;</p> <p>2.10. I was only one of many who tried their utmost to preserve Paternosters unique sense of place. I don't think that I exaggerate that this effort has the support of just about</p>		<p>assessed as part of the EIA process.</p> <p>3. Tourism in Paternoster The factors which have influenced the tourism industry in the West Coast are noted. Regarding the development of fishing factories, it must be noted that the indigenous locals of the area have indicated during the undertaking of the focus group meetings (refer to Appendix C) that the fishing factories are part of their livelihoods and considered as part of their heritage of the area. The success of Paternoster as a tourist destination is noted. The Scoping report acknowledges Paternoster as a tourist destination and also considers the potential impact of the wind farm on the tourism activities being undertaken in the area.</p> <p>It must be noted that Appendix J(a), page 12, as referred to by the I&AP does consider the international market and states that "The international market was made up of mostly Germans (46%) and tourists from the United Kingdom (21%).". The data sourced in the report is from WESGRO, 2017, and it can therefore be considered that the report does consider the international tourist market. It is noted that the Paternoster sense of place draws international tourists.</p> <p>As stated by the I&AP, the tourism sector in this area has been successful in and is still growing, with the Strandloper Ocean Boutique Hotel being considered as one of the top 25 Best Small Hotels in South Africa in 2017 and 2018. With construction commencing in 2013 on the West Coast One facility, a record of lessons learnt and trends and impacts on residents, tourists and tourism businesses provides a guide to the impacts and benefits which have been experienced in the Paternoster</p>

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	<p>every inhabitant of Paternoster. It is not only something close to the hearts of everybody, but has a huge economic effect through tourism and property prices.</p> <p><i>Bias in Scoping Report: Page 100 of the Scoping Report states inter alia as follows: "As part of this change a large number of holiday and retirement homes have been established in the area, specifically in towns such as Langebaan, Paternoster, Jacobsbaai and Britannica Bay area. As a result the traditional fishing village sense of place associated with the small coastal towns has largely been lost."</i></p> <p>This is far from the truth. Paternoster's unique sense of place manifests itself in a number of ways. It is firstly something which is experienced by most people who visit Paternoster it attracts tourists from all over the world who visits again and again and also manifests itself in a strong demand to own property in this unique place.</p> <p>Nowhere in the Scoping Report is Paternoster unique sense of place acknowledged. Why would there be such an enormous effort to preserve it if it didn't even exist? And why would it be made out as not to exist – perhaps to remove an obstacle to the successful approval of the proposed project?</p> <p>2.11. Paternoster's sense of place is an exceptional resource not only for the West Coast but also for South Africa as a whole – see Tourism below</p> <p>3. TOURISM IN PATERNOSTER</p>		<p>area, as well as the Peninsula as a whole. It is noted that the I&AP has indicated that the tourism sector sees constant growth year on year. This growth in the sector is with the existing West Coast One Wind Energy Facility as part of the landscape, and it is required to be considered through the EIA process if the construction of wind farms in the area have deterred visitors to the area, or new business ventures from taking place within the area. It must be considered by the I&AP that the general statement of all tourists visiting the area and not finding the wind farm attractive may not be true. It is necessary to revert to empirical data in order to draw fact based conclusions regarding the perceptions which have been raised during the Scoping phase. In order to further assess the potential for socio-economic impact, a Social Impact Assessment will be undertaken in the EIA Phase, which will also include the consideration of the potential for impact to property values, tourism and economic issues (which will focus on empirical data and tourism trends within the area considering the construction and operation of the West Coast One Wind Energy Facility). The information contained in this comment will be referred to the specialist for consideration.</p> <p>A Noise Impact Assessment will be undertaken as part of the EIA phase to assess the impact of noise on the surrounding areas.</p> <p>4. Economic impact of the proposed project The businesses and tourism facilities owned by the I&AP and family is noted. It is noted that the I&AP plans to further develop tourism facilities, which in his view will further enhance the sense of place. It is noted that more growth and momentum is expected in Paternoster within the tourism</p>

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	<p>3.1. One of the unique selling points ("USP") of the West Coast as a tourism destination is its wild beauty. This is especially due to its rugged coastline, world famous Fynbos and bird life;</p> <p>3.2. Despite this unique potential, the West Coast historically struggled to successfully break into the tourism market. In my opinion this was mostly due to following factors:</p> <ul style="list-style-type: none"> (i) The large and unsightly fishing factories and industries which were developed directly on its coastline; (ii) The commercialisation of the Saldanha Bay area with the building initially of the iron ore export harbor and then by the smelter. Economically this benefitted the area, but it also resulted in its industrialisation, which took away most of its beauty; (iii) Comparatively popular tourism destinations like the Garden Route (also close to Cape Town) were spared the ugly fishing factories and extensive commercial development, thereby enjoying a considerable advantage over the West Coast. <p>3.3. The West Coast is therefore fighting from the back foot to successfully get into the tourism market. Paternoster however has a different tourism profile than the rest of the West Coast and is experiencing a strong demand for tourism. Why is this?</p> <p>3.4. As the world grows economically, increasingly more people are being afforded the opportunity to travel resulting a continuous growth in the international tourism market. On the entry side of this market is the first time traveller who wants to explore and experience the well-known travel destinations. On the other side of the spectrum though is the well-travelled tourist. These discerning tourists want to escape the overcrowded and</p>		<p>industry, even though there is an already existing wind farm (i.e. West Coast One Wind Energy Facility) located within the area. The economic impact of the tourism activities within Paternoster is noted.</p> <p>The Scoping report does not focus on the reasoning as to why the unemployment rates for the towns within the area are what they are, but rather focusses on the impact of the development of the Boulders Wind Farm on the employment and unemployment in the areas surrounding the project site. The the impact of the Boulders Wind Farm on employment and tourism is not being excluded and has been identified as potential impacts within the Scoping report and the Social Scoping Study (Appendix J). It must be noted that the information provided in Appendix J(a) regarding the growth of the catering and accommodation sector is based on data sourced from Quantec, 2017, and as empirical data was used to quantify the growth it cannot be considered as biased. Also, due to the fact that the data used is for the entire Saldanha Bay Local Municipality, it is not possible to focus only on one particular town, but the focus is rather placed on the entire municipal area. It must also be noted that no diluting of data has been undertaken.</p> <p>The construction of a tourism facility versus the construction of a wind farm and the sustainability thereof cannot be compared due to the fact that the functions of the facilities are not comparable, as well as the difference in the particular skills required for the construction thereof. It must also be noted that the use of local content is required as part of the construction of a wind farm to be developed as part of the REIPPP programme.</p>

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	<p>commercialised places and are looking for a true place to relax and rejuvenate. The demand by these tourists shows in a strong trend away from mainstream destinations. This is the pinnacle of the tourism market and few places are able to break into this component of the market. Paternoster however is one of these places;</p> <p>3.5. We anticipated that Paternoster is able to break into this niche market and tested this with the opening of the Strandloper Ocean Boutique Hotel in 2012. It became the first hotel in Paternoster mainly focusing on the international Five Star market. Even our expectations were exceeded and although it is still in its infancy, Strandloper Ocean's success is proven by an overwhelming demand which are being experienced from this discerning market segment. The European winter when these tourist wants to escape the cold weather runs from approximately 5 months for the period November to March. During this period the hotel averages constant occupancy rates close to 100%;</p> <p>3.6. The hotel received both local and international recognition for its achievements. In 2014, shortly after its opening and whilst it was still a Guest House, the Minister of Tourism awarded it not only as the best Five Star Guest House in the Western Cape but also as the best Five Star Guest House in the whole of South Africa. After its conversion to a hotel, it had been in the Top 25 list of Best Small Hotels in South Africa in both 2017 and 2018. It was also featured in many national and international travel and lifestyle magazines and publications. ITB (International Tourism Board Berlin), the prime annual tourism fare worldwide also chose the Strandloper Ocean Boutique Hotel in 2015 as one of its 50 top destinations</p>		<p>It must be noted that the information sourced on property values have been from accredited databases. The information included in the Scoping report does not refer to a value of R30 000 for vacant land, refer to Section 5.8.3. It must also be noted, that the property values and trends within the areas surrounding the project site will be further investigated in the EIA phase as part of the Social Impact Assessment report. The history of the property values within Paternoster is noted.</p> <p>The aim of the Scoping report is not to consider the differences of the property values between the surrounding towns but rather to assess the potential for impact of the Boulders Wind Farm on the current property values of the area. The potential impact of the wind farm on the property values has been identified by the Social Scoping Study (Appendix J) and will be assessed further as part of the Social Impact Assessment to be undertaken as part of the EIA phase. The information contained in this comment will be referred to the specialist for consideration. The information provided to both the public and the authorities is considered to be complete and unbiased, and sufficient.</p> <p>5. Proximity and scale to Paternoster 5.1 The project site (i.e. 5084ha) being considered as part of the application has been identified by the developer for the development of a wind farm with a contracted capacity of up to 140MW. A 'funnel-down' approach has been applied in the EIA process which includes the consideration of the entire project site for the identification of a smaller development area in the site which is considered as containing the area with the highest potential for development (i.e. preferred</p>

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	<p>worldwide. This is testimony to the potential of Paternoster as a tourism destination;</p> <p>3.7. At Strandloper Ocean more than 80% of our guests are international tourists and at our Four Star rated cottages, this is also growing all the time -for 2018 approximately 50%;</p> <p>3.8. We are also experiencing first hand that more and more of these discerning tourists are choosing Paternoster above well travelled destinations like for example Plettenberg Bay, Knysna, etc which are increasingly being viewed as over commercialised. Paternoster is also closer to Cape Town which has become a top international tourism destination and which is again and again awarded as one of the most beautiful cities in the world;</p> <p>3.9. It is expected that demand from discerning tourists will shift more and more toward unique destinations which offer tourists something different and an escape from the worlds they are living in daily. Paternoster with its unique sense of place is an ideal destination. It is therefore a very valuable resource for the economic development of the West Coast as explained more in paragraph 4 below;</p> <p>3.10. From the point of view of the discerning well-travelled tourist, Paternoster is without a shadow of any doubt the jewel in the West Coast's tourism crown and is playing a key role in changing the negative perception of the West Coast as a tourism destination;</p> <p><i>Bias in the Scoping Report: As is the case with Paternosters unique sense of place, the Scoping Report avoids any mention of Paternosters exceptional success as a tourism destination. Instead it is grouped together with other towns - St Helena Bay finds it very hard to succeed in the</i></p>		<p>development area – Figure 7.19). Following the Scoping phase, the developer designs a facility layout (i.e. development footprint) within the preferred development area which considers the visual and noise sensitivities and avoids the on-ground sensitive features. It is the intention of the developer to identify the best possible location for the development of a wind farm within the larger project site. As per Chapter 1, Section 1.2 of the Scoping report, the development footprint (i.e. actual area within the project site that will be affected by the wind farm infrastructure) will be 55ha in extent, which will occupy approximately 1% of the entire larger project site.</p> <p>It must be noted that there is no requirement for the developer to develop a renewable energy facility within a Renewable Energy Development Zone (REDZ) and as there is no REDZ located near the project site this was never considered as part of the Scoping report assessment. As the facility is not located within a REDZ it does not mean that the location thereof is less preferred from a technical perspective. The REDZ have been identified in order to demarcate areas within which wind and solar projects can be fast-tracked for environmental approval.</p> <p>5.2 It must be noted that the distances provided in the Scoping report of the project site in relation to the surrounding towns have been measured from the centre of the project site in order to provide the general location project site in relation to the surrounding areas.</p> <p>The photograph included on page 70 of the Scoping report was used in order to provide visual aid in describing the current regional setting of the project site. The photograph has not been included to provide misleading information regarding the</p>

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	<p><i>tourism market due to the area being dominated by fishing factories and Vredenburg is the commercial centre of the area offering no attraction for tourism. Following this approach the Scoping Report plays down the success of Paternoster as a tourism destination.</i></p> <p><i>On Page 12 of Annexure J(a) an interesting statistic is mentioned in passing namely that 94% of visitors to St Helena Bay are domestic and for Paternoster it is 66%. The report does not consider the international component which is then 6% in St Helena Bay and 34% in Paternoster, i.e. nearly 6 times higher. This is another pointer to Paternoster's unique sense of place drawing more international tourists.</i></p> <p>3.11. The core strength of Paternoster and what makes it stand out as an international tourism destination is its unique sense of place. Other stand-out attractions are its largely undisturbed nature, long sandy beaches (which are not overcrowded and which will stay like this by keeping Paternoster relatively small) and its gourmet restaurants. Projects like the proposed windfarms are an absolute no-go for this segment of the tourism market. These mostly European tourists are used to these type of facilities being pushed away from living areas to remote places, even preferably off-shore. It is absolutely not the type of environment where they want to spend their precious holiday time. Numerous tourists staying with us, have already enquired about the existing wind farm raising their concerns, even claiming to hear the noise! The fact that windfarms are also viewed by many as a threat to their health, makes the position even worse. It is therefore unfathomable to picture the impact of an enlarged windfarm.</p>		<p>visual impact of the existing West Coast One Wind Energy Facility, but rather to provide context of the town of Paternoster. The turbines in view in the photograph are existing West Coast One Wind Energy Facility turbines.</p> <p>The expansion of the Paternoster urban-edge is noted. The stated distances of 30 meters from the stands on the northern border of Paternoster and 300 meters from a proposed resort are distances to the outer boundary of the project site, and not the preferred development area. When considering the preferred development area as identified in Section 7.4 of the Scoping report, within the project site, these distances would be greatly increased. Should the development footprint be located within the preferred development area, the facility will be approximately 3.8km east of the area mentioned by the I&AP.</p> <p>It must be noted that the affected farmers as I&APs of the Boulders Wind Farm are within their right to raise their comment and support of the development within their properties, even if they are to possibly gain financially. It must also be noted that the farmers are within their full right to explore alternative land-use activities within their properties, especially as the land is considered as "very low yielding land", as stated by the I&AP. The public participation process is an open and transparent process which provides all I&APs with the platform to comment on the project. All comments received from I&APs are treated equally to ensure that a balanced view of the comments is gained, whether these are positive and/or negative and not considered to be correct or rational by other I&APs.</p> <p>It has been confirmed by the affected landowners that the</p>

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	<p><i>Bias in the Scoping Report: In the Scoping Report a wind farm is even listed as a key tourism attraction! For the type of tourist who visits Paternoster a windfarm is the antithesis of a tourist attraction.</i></p> <p>3.12. The number and quality of restaurants in Paternoster further underlines Paternoster's success as a tourism destination. One of the best indicators of a town's success in the tourism market is the number and quality of restaurants present. The number of restaurants points to the popularity of the destination and the quality to the type of tourist. What is striking in Paternoster's case is not only the number of restaurants which sprang up in a short time and are also growing all the time, but the quality of these restaurants. By comparing the restaurants on Tripadvisor for Paternoster and Langebaan, the different type of tourist is evident. It is very clear that the upper end of the tourism segment is part of Paternoster's target market. This is the most valuable segment of the tourism market and Paternoster is perfectly suitable;</p> <p>3.13. The density of gourmet experiences in Paternoster was even mentioned in a BBC travel documentary who were impressed by the small size and the quantity and quality of impressive culinary offers. One of the rising chefs of South Africa, Kobus van der Merwe, attracts foodies and media from all over the world and his restaurant, Wolfgat recently featured in the list of the top 50 restaurants in the world;</p> <p>3.14. In conclusion, the West Coast faces an uphill battle to become a player in the tourism market, by damaging its most valuable resource, will be akin to shooting oneself not only in one knee but in both, the whole area's tourism</p>		<p>intention of the undertaking of wind farming activities in their properties is to generate additional income in order to enhance their farming activities and be able to employ more farm workers and not be put in a position that workers need to be retrenched due to financial constraints. It must be considered that the affected farmers/landowners are fully within their rights to consider the undertaking of alternative and additional land-use practises in order to support their current farming operations. Considering the above, the benefit of the project on the enhancement of farming activities and farm labourers is considered to be productive, rather than unproductive, as stated by the I&AP. This sentiment has been supported by the affected landowners, who have provided positive responses through the public participation process of the project.</p> <p>6. Bird Life It is noted that there is a conservation programme for owls and bats in the area to compensate for loss of the birds and bats as a result of the expansion of the town of Paternoster. The potential impacts of the wind farm on both birds and bats has been identified in the Scoping report, 12-month monitoring programmes have been undertaken in line with SABAA and BirdLife South Africa's Best Practice Guidelines, and will be further assessed during the EIA phase. An Avifauna Scoping Study (Appendix F) has been undertaken to identify the potential impacts of the Boulders Wind Farm on the birds within the area. The Avifauna Impact Assessment will be undertaken during the EIA phase to further assess and ground-truth the impacts on the birds within the area. The potential presence of Kestrels in the area is also noted and the risk to the species will be considered in the Avifauna Impact Assessment.</p>

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	<p>may be affected;</p> <p>3.15. Tourism is one of the key sectors in the area employing a significant and growing percentage of the community and sustaining their families. Paternoster's outstanding ability to draw top-class tourists in the highest segment of spending power stands out and is an incredible valuable resource for the West Coast. Despite being still a young destination, big successes had already been achieved and indicates the hugely still to be unlocked potential. Paternoster is really an oasis of opportunity which cannot be replicated, at least at this this stage, by any other place on the West Coast. To damage this potential by building a windfarm which can be replicated in many other places cannot be motivated.</p> <p>4. ECONOMIC IMPACT OF PROPOSED PROJECT</p> <p>4.1. My family is involved in Property Development and Tourism in Paternoster. On the tourism side we started the following successful businesses in Paternoster:</p> <ul style="list-style-type: none"> (i) La Baleine Beach House Collection (www.labaleine.co.za); (ii) The Cottage Collection (www.thecottagecollection.co.za); and (iii) Strandloper Ocean Boutique Hotel (www.strandloperocean.com) <p>4.2. These accommodations sold approximately 13 500 guest nights to tourists during 2017. It employs approximately 50 people, i.e. approximately 1.5 employment opportunities per room;</p> <p>4.3. On the Property Development side we intend to develop further tourism accommodations which include 300-350 holiday cottages. This will be done in a way to enhance</p>		

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	<p>Paternoster's sense of place;</p> <p>4.4. Once expansion plans are completed (see registration of the above entities as I&AP as well as Erf 1050 Paternoster (Pty) Ltd our property development company) the current 35 rooms is projected to grow to more than 300 Rooms. On a pro rata basis this is estimated to increase the 13 500 guest nights to more than 100 000 and could add a further 450 job opportunities;</p> <p>4.5. Although Paternoster is still in an early stage of development as a tourism destination, it is well established and on a strong growth path. Growth is expected to gain more and more momentum;</p> <p>4.6. Tourism activities have a far greater economic impact than a windfarm project for the following reasons:</p> <p>(i) It is an ideal industry to absorb relatively low skilled workers. We are experiencing this first hand, unskilled workers are being trained and successfully employed providing opportunities which would otherwise not have been possible;</p> <p>(ii) Both for teenagers and young adults the dynamic hospitality development in Paternoster is offering them finally a perspective to make a career in this field. The professional future of the local population is under enormous threat considering that fishing is facing a very uncertain future due to overfishing and environmental impacts;</p> <p>(iii) By providing work to these families, the whole area is uplifted as children are provided with a better future. This is already gaining more and more momentum in Paternoster. Given that this was achieved in an extremely short time in challenging economic circumstances makes it even more remarkable. This</p>		

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	<p>is strong testimony to Paternosters still unlocked potential;</p> <p>(iv) Salaries and wages is proportionately the biggest expense in a tourism business. A relatively large proportion of revenue is therefore paid into the local economy. In the case of a windfarm by far the majority of income is paid to financiers and investors which is not situated in the West Coast area;</p> <p>(v) The economic multiplier affect following the spending of salaries and wages into the local economy is also much greater.</p> <p>4.7. It is interesting to note from the Scoping Report Annexure J(a), page 9 that the comparative unemployment rates of the towns around the proposed windfarm are as follows:</p> <p>Vredenburg – 26%; Paternoster – 10% St Helena Bay – 30%</p> <p>This shows the following:</p> <p>(i) That despite Vredenburg being the most active commercial area, that its unemployment rate is 260% that of Paternoster;</p> <p>(ii) That St Helena Bay's unemployment rate is 300% that of Paternoster. St Helena Bay does not enjoy the success of Paternoster as a Tourism Destination. Paternoster's low unemployment rate shows the impact of a successful tourism industry and also raises the question why Paternoster can be so successful and St Helena Bay not. The fundamental answer lies in Paternoster's sense of place which gives it a unique advantage.</p>		

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	<p><i>Bias in Scoping Report: Despite being such a stand-out statistic, no attempt is made in the Scoping Report to investigate the reasons behind the much lower unemployment rate of Paternoster compared to the other two towns. The potential impact on employment is one of the most important issues affecting the evaluation of the Boulders Windfarm and is a key part of information to enable an informed decision. Why is this being ignored instead of being thoroughly analysed? Is it because a successful tourism industry in Paternoster may impact negatively on the approval of the project?</i></p> <p>4.8. Annexure J(a), Page 7 of the scoping report also examines the annual economic growth of the SBMs economy over the period 2006-2016:</p> <ul style="list-style-type: none"> (i) Total growth amounted to 1.5% per annum over the period; (ii) It comments that the Catering and Accommodation component showed stagnant growth of 1%. <p><i>Bias in Scoping Report: Mention is made that Catering and Accommodation is stagnant, but no mention is made of Construction growth which include the construction of holiday homes which showed a growth rate of 3.8% over the period. Also, as shown above, the tourism positions for the different towns are materially different and it is not possible to analyse them as a group. Paternoster is a very young tourism destination, only starting in the early 2000's after which it developed very fast. Tripadvisor for example currently lists the following number of tourism accommodations and restaurants:</i></p>		

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	<p>(i) 20 Guest Houses and hotels (ii) 17 Specialty Lodgings; and (iii) 17 Restaurants</p> <p><i>The above could not be possible at a 1% growth rate. Is it another example of diluting the success of Paternoster by grouping it with the other towns?</i></p> <p>4.9. Not only is the effect of tourism far more beneficial for the long term economy than the proposed windfarm, but also the construction impact from tourism facilities is much more beneficial for the following reasons:</p> <p>(i) As construction will be happening over a prolonged period it is a sustainable economic input compared to short term;</p> <p>(ii) More local labour and materials are being used in the construction process;</p> <p>(iii) From a labour perspective the building of these facilities can be done with local labour whilst the construction of the proposed windfarm is more complex needing more imported labour, likely migrant workers moving from one wind farm construction to another;</p> <p>(iv) From a building material perspective, windfarms use a considerable percentage of imported components whilst the materials for the development of tourism facilities has a far larger local content.</p> <p>4.10. Regarding property prices, the data used in the Scoping Report is not reliable for the following reasons:</p> <p>(i) The value of a seafront stand in Paternoster is in excess of R4.0m and a completed seafront property</p>		

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	<p>costs in the range of R6.0-R10.0m. These are the highest value properties;</p> <p>(ii) According to the Scoping Report the highest values in Paternoster are sectional title schemes;</p> <p>(iii) From experience I know that prospective buyers in Paternoster far more prefer freehold ownership than Sectional Title ownership;</p> <p>(iv) The price of vacant land is quoted at R30 000 in 2017, this is so far out that it cannot deserve serious attention.</p> <p>The data in the Scoping Report regarding property prices in Paternoster is therefore very questionable.</p> <p>4.11. Property prices tell an important economic story. In the case of Paternoster it supports the above notions of Paternoster's unique sense of place and also its tourism potential:</p> <p>(i) Property prices in Paternoster are much higher than that in Vredenburg and St Helena Bay even according to the questionable figures provided in the Scoping Report;</p> <p>(ii) Based on this prices are currently about twice as high in Paternoster compared to the other 2 towns and 10 years ago it was about 4 times higher. Why this huge difference?</p> <p>(iii) 10 years ago was around the time of the so-called Financial Crisis. Before the Financial Crisis prices skyrocketed in Paternoster. The reasons for this were basically twofold. Firstly it was due to the premium buyers were prepared to pay for Paternoster's sense of place and secondly due to the tourism income which purchasers expected to earn by letting properties out to tourists;</p>		

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	<p>(iv) The reason why the price multiple came down from about 4 times to 2 times also tells a story. It has to do with the fact that whilst there was a big drive countrywide over the past 10 years to sell second homes, tourism incomes continued to grow in Paternoster. This pointed to a good investment and owners were also acutely aware of the unique sense of place which was the reason behind the premium they paid when they purchased the property;</p> <p>(v) Owners were therefore reluctant to sell and although there was a relatively large reduction in property prices at other holiday destinations, in Paternoster properties retained their values as owners were not prepared to reduce prices for the reasons as set out above;</p> <p>(vi) It resulted in stagnant prices with little turnover;</p> <p>(vii) Property prices were then impacted by the emergence of Petty Crime in Paternoster. As Paternoster is being visited from such a wide spectrum of tourists, news about petty crime spread quickly and resulted in the current position where Paternoster is perceived as an un-safe destination. This is negatively affecting prices, but prices is still about 2 times higher than the surrounding towns. Why? Again the answer is straight forward namely that despite the negative perception about crime, people are still prepared to pay higher prices due to its unique sense of place and the tourism income it offers. What is also interesting is that tourism income continued to grow despite the strong emergence of petty crime;</p> <p>(viii) There is a strong effort underway to correct the petty</p>		

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	<p>crime position and this will hopefully only have a short term affect. The impact of a windfarm will however have a long term.</p> <p><i>Bias in the Scoping report: There is no mention or attempt to any explanation of the very large difference in property values between Paternoster and the other surrounding towns. This is again such a stand-out fact and the lack of any research or comment on this creates again the impression that anything which may negatively affect the windfarm application, be better left alone. As a result both the public and authorities are not being provided with reliable information to make a decision upon.</i></p> <p>5. PROXIMITY AND SCALE TO PATERNOSTER</p> <p>5.1. The footprint of the existing wind farm is approximately 1 840ha. The proposed project will add a further 5 084 ha, i.e. increasing the total size to about 4 times larger. This affect is compounded by the size of the new turbines which will be much larger than the old ones. If one assumes that the latter will say double the visual impact, on a simple mathematical basis the impact of the new facility will be approximately 8 times more than the current windfarm. The relative vastness of the landmass which is covered by the project is put into perspective by the map on Page 72 of the Scoping Report , the total effect will be enormous!</p> <p><i>Bias in Scoping Report: Nowhere in the scoping report is it mentioned that the proposed development does not fall within the gazetted (Government gazette no. 41445 dated 16 February 2018) renewable energy development zones</i></p>		

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	<p>(REDZ). The strategic environmental impact assessment (SEA) undertaken from which the REDZ derived were specifically done to identify the best strategic locations for these developments. Areas (like the proposed wind farm) that do not fall within the REDZ by default must be less optimal for development purposes. This is made worse by the fact that it is proposed to be put at a place where it will have a negative impact on a unique and valuable resource.</p> <p>5.2. The consequences in 5.1 is further compounded by:</p> <ul style="list-style-type: none"> (i) The proposed project moving directly into the view of many properties in Paternoster; (ii) The changing of the outlook from these properties from a calm West Coast landscape to one with huge structures, revolving turbines and flashing lights; <p>Bias in Scoping Report: On several places in the report it is stated that the project is 7km from Paternoster. On page 70 there is also a photo attempting to show that the windfarm will have little impact on views from Paternoster.</p> <p>This is a total mis-representation. Nowhere in the Scoping Report is it mentioned that the proposed windfarm is less than 30 meters away from the stands on the northern border of Paternoster. These stands include the Strandloper Ocean Boutique Hotel, one of Paternosters main tourist attractions. The urban edge of Paternoster is still expected to move north, this will then be right against the windfarm. A resort is also zoned on the northern border of Paternoster. This is the land I purchased to stop an unfavourable development (see 2.9 above). It is valuable with over 3 km of seafront and its development will have a</p>		

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	<p>material impact on tourism in Paternoster. The proposed windfarm is less than 300 meters away from this resort. Instead of providing these facts, the Scoping Report instead states that the project is 7km from Paternoster.</p> <p>The Scoping Report mentions the support of a number of parties including certain farmers. Surely they will support a development on their properties from which they will financially gain, especially on very low yielding land! This support is however from a few farmers who will benefit financially and not from the whole community most of whom have the risk of suffering economically through lower returns on their tourism properties, lower market values, reduced quality of living, a different landscape which they expected when they bought properties, less job opportunities and the economic consequences of this.</p> <p>The creation of a second income for the affected farmers will likely see a decreased desire to farm this land and it could very well mean that they do not actively farm anymore (especially so as the scoping report mentioned that agriculture in these areas are subject to factors which influences its sustainability). There is a therefore a high risk of job losses in the labour intensive agricultural industry. In a country like South Africa where the creation of jobs is of foremost importance, it seems that this project is counter-productive in the Paternoster area.</p> <p>6. BIRD LIFE</p> <p>6.1. The proposed project seems to have a high risk for the bird life of the area. I am not fit to expertly comment on this, but based on my conclusion from the other issues which I</p>		

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	<p>understand, it may be that these risks were also not being fully analysed;</p> <p>6.2. I can also point out as a further example of our efforts to make Paternoster a better place that even at Strandloper Ocean Boutique Hotel we started a conservation programs consisting of owls and bat hotels to attract and protect these birds. The owl project was started to control the field mice population as natural predators were reduced due to the development of Paternoster and also to give these endangered species a habitat. I can also mention that in and around December a migrating group of Kestrels migrate from Europe every year to breed in Paternoster and raise their babies. This has even become an attraction for many returning guests. I don't know their path to get to us, but with the windfarm being so extensive, they must be exposed to a high risk.</p> <p>In conclusion, the most important thing we need in Paternoster is jobs for our people. Without this, what will the future be? Development of the proposed windfarm holds many more negatives than positives. It will start off by destroying the sense of place of Paternoster, which will again damage the tourism industry leading to reduced jobs in an already very tough environment where there are very limited options for our people to make a living.</p>		