

APPENDIX D-9: COMMENTS REPORT (ISSUES AND RESPONSE TRAIL) AS IT STANDS ON 31st OCTOBER 2013

NAME	ISSUE	DATE	RESPONSE
1. GENERAL			
Dave Young	<p>Concerned that he wasn't informed of the project</p> <p>Wants a specialist report done on the devaluation of the property as a result of the wind farm and raised concerns that the assessment is flawed as it didn't include a specialist report on the impact on the property price</p>	06/06/2012 Via Public meeting	The PPP conducted by CES exceeded the minimum requirements under NEMA, evident by the additional public meeting held on the 23 rd January 2012 to engage with the Coombs Agricultural Association as well as the extraordinary meeting held with Mr Pieter Moll, Dave Young, Adri Timm, Orgie, Murray & Petra Crous on the 4 th June 2012. An additional photomontage was commissioned upon request from Orgie and Murray Crous. Several members of the Coombs Agricultural Association are involved in the game industry and the wind farm was on the agenda of meetings held on the 23 rd January 2012 and the 25 th April 2012. Notice of meeting and agendas were emailed on the 19 th of January and the 19 th April 2012 respectively and included distribution to Mr Dave Young (for both meetings) and Mrs Adri Timm (for the 25 th April meeting only). Please see Appendix D for copies of emails, agendas, minutes and attendance registers).
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612) and Adri Timm (Huntshoek Safaris)	Concerned that they did not have copies of the EIR.	06/06/2012 Via Public meeting	CES: The draft EIR, suite of specialist studies and EMPr were emailed to Mr Moll on the 5 th June 2012. Please see Appendix D for copy of email.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	We question what wind data was used as stated in the report as a selection mechanism.	06/09/2012 Written	Plan8: As we stated in great detail during an explanation during the public meeting, and as you yourself refer to just a few lines before this query, we select sites with a good wind resource based on a software model ; in this case a mesoscale model of the wind resource for the Eastern Cape generated by the company 3tier (www.3tier.com): This model gives a very accurate idea of what the wind conditions will be at any given point. The model is built by inputting a large cross-section of data from sources

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			such as SAWS (South African Weather Service) and building a topographically-driven mathematical representation of the resource.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	Response to STEP description in Chapter 3 of final EIR “ no indication is given of whether the site falls within mega conservancies or other corridors- this is an important consideration for the conservation of systems and species”	06/09/2012 Written	CES: The revised final EIR has been updated accordingly.
2. PROCEDURAL			
Murray Crous Settlers Safaris/Honeykop Lodge	<p>The developers did not approach the affected neighbours of the project in order to reduce the negative impacts of this project.</p> <p>From our lodge the proposed wind turbines will be in view, which will put off many hunters and thus we will suffer financially.</p>	14/12/2011 Email	CES: Many of the negative impacts have been addressed in this revised Final EIR, including visual and noise. The final layout now has the closest turbine 1537 m from your lodge.
Murray Crous Settlers Safaris/Honeykop Lodge	Letters were sent to farms closer than 1 km to the site, since then the amount of turbines and their numbering have changed. No follow up has taken place causing the affected parties not to be up to date as to the extent of the effects to their property. See graphs in Noise impact assessment.	04/06/2012 Email	CES: This has been addressed through consultation with Mr Crous throughout the EIA process and detailed in this Final EIR.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	<p>We are of the opinion that the Public Participation Process (PPP) was flawed.</p> <p>“While we accept that the consultants may have met the minimum requirements of the legislation we believe that they did not act in the spirit of the law. The consultants are resident in the Grahamstown District and are fully aware of the importance of the game industry and the value of the area to tourism, domestic and international and yet they chose to ignore one of the most</p>	06/09/2012 Written	CES: The PPP conducted by CES exceeded the minimum requirements under NEMA, evident by the additional public meeting held on the 23 rd January 2012 to engage with the Coombs Agricultural Association as well as the extraordinary meeting held with Mr Pieter Moll, Dave Young, Adri Timm, Orgie, Murray & Petra Crous on the 4 th June 2012. An additional photomontage was commissioned upon request from Orgie and Murray Crous. Several members of the Coombs Agricultural Association are involved in the game

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	important economic sectors in the region.”		<p>industry and the wind farm was on the agenda of meetings held on the 23rd January 2012 and the 25th April 2012. Notice of meeting and agendas were emailed on the 19th of January and the 19th April 2012 respectively and included distribution to Mr Dave Young (for both meetings) and Mrs Adri Timm (for the 25th April meeting only). Please see Appendix D for copies of emails, agendas, minutes and attendance registers).</p> <p>The review period of the draft EIR was in fact extended by 5 days (until the 11th June 2012) to allow Mr Moll additional time to comment, subsequent to the extra-ordinary meeting held on the 4th June 2012 (the date on which he first registered as an I&AP). Please see Appendix D final EIR for a copy of relevant email.</p> <p>Plan8: This is an unsubstantiated opinion. CES has run the EIA process within the requirements of NEMA. For further clarification, please consult with their representatives.</p> <p>We note that you accept that the consultants may have met the requirements. Please refer to our comment above. For concerns relating to the hunting industry, please refer to our socio-economic impact assessment.</p>
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	Of concern here is the dismissive manner in which our comments were handled” Mr Moll then refers to a comment by CES requesting Mr Moll to put his further questions into writing.	06/09/2012 Written	<p>CES: We regret that Mr Moll misinterpreted the comments as dismissive; they were purely intended to accurately capture his objection.</p> <p>Plan8: CES did an exemplary job in answering questions and chairing of the meetings. They were greatly encouraging of all parties to voice their opinions. Far from being dismissive, CES' request to record any questions in writing displays a desire to be diligent and record, in writing, any concerns of I&APs. Indeed, as developers we also repeatedly requested that I&APs engage with us, either by</p>

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			<p>phone or in writing at any point that they desire, in order for us to assess and engage with local stakeholders. However, no such communication was forthcoming, making our understanding of the issues limited to what could be gathered through the formal processes and. Later, through specialist fieldwork. So, far from being dismissive, CES and ourselves have always had open doors. Indeed, we have organised, and made budget available for, meetings of I&APs and EIA practitioners outside of what is required by law, in order to allow all parties to voice their opinions and gain a fuller understanding of various viewpoints.</p>
<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>At no time were we informed of our rights as stipulated in the NEMA Regulations. We are of the opinion that it is incumbent upon the EAP to inform us of our right to comment on the final report and of the manner in which we must comment as stipulated in section 2 and 6 of section 56 of NEMA. This flaw is in itself sufficient reason to issue a negative authorisation for the proposed project.</p>	<p>06/09/2012 Written</p>	<p>CES: During the extra-ordinary meeting held at the CES offices in Grahamstown on the 4th June 2012 (specifically arranged to accommodate Mr Moll, Mr Young and Mrs Timm), Bill Rowston detailed the Public Participation Process under NEMA, including the way forward for the remainder of the project (see minutes of meeting p 284 to 291). Mr Moll only registered as an I&AP after this meeting (no previous communication was received from him) and Jadon Schmidt was in regular telephone contact with Mr Moll between the date of the meeting and the completion of the Final EIR, during which time he emailed the Draft EIR, suite of specialist studies and EMPr (emailed on the 5th June 2012) as well as the final EIR which was emailed to Mr Moll on the 27th July 2012. Mr Moll was afforded the opportunity to review and comment on the Draft EIR, specialist studies, EMPr and Final EIR, this response addressing a comment made in his written submission to DEA on the Final EIR (received by DEA on the 6th September 2012).</p>

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Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	Based on the above we believe that the environmental impact assessment ("EIA") process did not comply with mandatory legal requirements...."	06/09/2012 Written	CES: Please see all responses to in Section 2 above. We believe all mandatory legal requirements have been met and exceeded in certain instances.
Adri Timm	<p>Please be advised that in order for me to receive notifications in time, I would appreciate that they are emailed to me directly as well.</p> <p>Your notification by registered mail was only received on my desk last week much too late for any action. I have been out of office for a month and mail was collected by central postal service and then forwarded to me upon return. Had I received an email notification I would have been able to access the documents immediately.</p> <p>I would appreciate that your office, follow up, within a reasonable time frame if notifications have indeed been received. It is, however good business practice to ensure that important correspondence reached the elected recipient.</p> <p>So as requested please forward via email directly and should you so wish, and I would advise send registered mail as well to ensure procedure is followed, however please keep in mind that although every effort is made on your side and you have the peace of mind that you have followed protocol, its not always the best way on the recipient's side</p>	15/10/2013 Email	CES: Noted. All future correspondence will be sent by email to you as well.
3. ALTERNATIVES			
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	The section on alternatives is inadequate and does not offer an adequate motivation for the subject site.	06/09/2012 Written	CES: Fundamental (different locations) and incremental (design and layout) alternatives were considered as part of the EIA process. Chapter 5 of the final EIR has been amended to clearly detail the process of due consideration of alternatives. The site selection methodology employed by the developer is attached in Appendix H.

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Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	We are of the opinion that the failure of the EAPs to assess alternative location...	06/09/2012 Written	CES: Alternative locations were thoroughly assessed by the developer prior to commencement of the EIA. Chapter 5 of the Final EIR has been amended to clearly detail the process of due consideration of alternatives. The site selection methodology employed by the developer is attached in Appendix H.
4. TOURISM, BUSINESS OPERATIONS & LAND VALUE			
Murray Crous, Petra Schutrops (Neighbouring Landowner - Bushmans Gorge Lodge and Settlers Safaris hunting outfit)	The area will be spoiled for hunting purposes.	12/12/2011	CES: Please refer to SEIA
O. Crous (Neighbouring Landowner)	<p>Has any research been done on the long-term breeding patterns of wild game within a distance of one kilometre of a forest of wind turbines? We are breeders of rare and expensive species of game.</p> <p>I feel strongly that it should not be just the landowners on whose property the turbines are going to be erected to gain financially from the project, but the surrounding landowners who have got to suffer the effects of the wind turbines. Spoiling landscape, noise, lights, loss of business from hunting lodge, decreased property value etc.</p> <p>Regarding above point, I want to see the Coombs Agricultural Association being involved. This association being for the benefit of the farmers in this area as well as the farm workers and their families</p>	12/12/2011 via email	<p>CES: As far as we are aware, no such research in South Africa has been conducted on any wild game.</p> <p>Please refer to SEIA</p> <p>The CAA has been involved throughout the process. Please refer also to CNA.</p>
Dave De La Harpe	The construction of a substantial Windfarm on the	14/12/2011 via email	CES: Please refer to SEIA

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A director of Amaraka Investments No. 6 (Pty) Limited (the owner of the farm properties Stoneyvale, Governor's Kop, Uniondale and the Orchards)	high lying ridge above Coombes Valley will impact negatively on all eco-tourism and hunting concerns in the vicinity and in particular to Amaraka Investments No. 6 (Pty) Limited.		
Murray Crous , Petra Schutrops (Neighbouring Landowner of Bushmans Gorge Lodge and Settlers Safaris hunting outfit)	<p>We breed expensive and rare animals such as Black Impala, Golden Wildebeest, Copper Blesbuck and we are worried that the disturbance of this project will affect there breeding behaviour and the game populations greatly.</p> <p>This plan as it is will only benefit the farmers that supply the land and the companies involved in erecting the turbines and all the other neighbours will have to suffer the negative environmental as well as financial consequences of this plan.</p> <p>Our outfit caters for foreign hunters and non-hunters who wish to spend their holidays in a natural untouched environment. From our lodge the proposed wind turbines will be in view, which will put off many hunters and thus we will suffer financially.</p>	14/12/2011 via email	CES: Please refer to SEIA
Dave De La Harpe Director of Amaraka Investments No. 6 (Pty) Limited (the owner of the farm properties Stoneyvale, Governor's Kop, Uniondale and the Orchards)	A development of a Windfarm on this particular site, no matter how attractive it may be to the Developer and the Landowners will adversely impact upon other legitimate land-users and in particular Amaraka Investments No. 6 (Pty) Limited in that the visual pollution will be considerable and will in all probability make it more difficult if not impossible to sell eco-tourism and safari operations on its property and will most certainly reduce the value of its considerable investment in land.	14/12/2011 via email	CES: Please refer to SEIA

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A Timm Huntshoek Lodge cc Edcot Trust t/a Huntshoek Safaris	The impact on game farms and tourism most definitely would be a negative one, as we rely extensively on the pristine beauty and untouched landscapes to attract visitors to our area and should these wind turbines mar this picture, which it will, visitors to most of the game farms and lodges in this area will drastically decline as no one wants to sit and watch noisy wind turbines whilst they paid to come and experience nature.	04/06/2012 Written	CES: Please refer to the SEIA and CNA.
Murray Crous Settlers Safaris/Honeykop Lodge	I reside and conduct my business Settlers Safaris from the farm Honeykop directly adjacent to the proposed site with the closest proposed turbine at 532 meters.	10/06/2012 Email	CES: The final layout has addressed this concern and the closest turbine is now 1537 m from your residence.
Murray Crous Settlers Safaris/Honeykop Lodge	My main concern is the loss of income I am expecting to incur. It makes me very concerned for my livelihood as well as the livelihood of my workers.	10/06/2012 Written	CES: Please refer to SEIA
K. Rawson, N. Rudy, O. Crous Owners of The Hills Game Estate	It will not only affect our business negatively, but the future land value of the property negatively. This area is mostly game farming orientated, of great historical background around the Great Fish River and must not be intruded upon by landscape changing turbines.	10/06/2012 Email	CES: Please refer to SEIA
Gavin Dixon	Some farmers will benefit directly from the wind farm, while others won't. How will the others be compensated, on properties where ecotourism or hunting lodges either operate or might in the future, for instance?	14/11/2011 Public Meeting	CES: Please refer to SEIA & CNA
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	The issues of impact on property price and clientele numbers on the hunting lodge: "The final EIR does not address the above two issues."	06/09/2012 Written	CES: Please refer to the SEIA Plan8: These two issues are open to speculation, and it would not be good practice for any

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Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	“Dave Young and Peter Moll : Dave and Peter both raised concerns about the negative impact the turbines will have on the value of their property... (BR) explained that there is no way of knowing what the impact will be as there are no wind farms currently in South Africa...” Moll then refers to an article that states that property prices in the UK might be devalued as a result of their proximity to a wind farm.	06/09/2012 Written	environmental consultant to speculate without substantiation. However, we are willing to examine all and any studies relevant to these issues. This is explored in detail in the SEIA. Plan8: We appreciate you raising this concern and believe this issue deserves further illumination. However, the example used in the letter is one-sided. It is, firstly, in reference to an article published in the media, rather than an academic study. There are many academic studies that report that property prices remain stable: several global studies that point to no change whatsoever in property value in areas near wind farms. Some even point to a positive impact on property prices. One overview of multiple wind farm studies on wind farms and their effect on rural property states that of all of the reviewed studies of the issue they came to the; “... Finding that 61 (62.3%) found no relationship between proximity to a wind farm and property values, 27 (27.6%) found a positive relationship, and 10 (10.2%) found a negative relationship. These 98 studies are of mixed empirical value, but include cases from one turbine to over 3,500, done from 1994 to 2009, and involving as little as one property to as many as 9,000.” (Springfield-Sagamon County Regional Planning Commission Report). As a wind farm developer, it is our view that it is extremely unlikely for there to be any negative impact on property prices over the longer term. Please refer to our detailed SEIA for further information.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	The criteria used by the proponent do not cover any socio-economic aspects.	06/09/2012 Written	CES: Please refer to the SEIA and CNA.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	A serious omission in the studies is the lack of a socio-economic impact assessment	06/09/2012 Written	CES: An SEIA and CNA has subsequently been conducted. Please refer to these respective studies.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	The Kwandwe Game Reserve in the Fish River Valley to the West of the proposed wind farm has recently been sold for between 200 and 250	06/09/2012 Written	Plan8: We fail to see how the price of the Kwande Game Farm is relevant to the prices of local farms without seeing an evaluation of the properties

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	Million Rand, which is indicative of the farm values. If the facility is authorised we will see a dramatic decrease in property values. This is borne out by international studies.		involved. The letter goes on to state that the property prices of the area will see a decrease. However, this argument is not substantiated in any way, and reference is made to studies which are not referenced. Having no references, and being unsubstantiated, we cannot see how we are expected to comment on this point, but can point you to the studies we have already completed, and knowledge of other, third-party studies completed thus far.
5. VISUAL			
Mr O. Crous Neighbouring Landowner	Any lights on structures must shine up into the sky and not sideways or downwards. Painting of structures to blend in with sky and surrounding countryside, not plain white colour. What is the distance from the nearest turbine to my homestead or boundary and how many would be erected?	12/12/2011 via email	CES: Civil Aviation Authority require that the turbines are white.
Murray Crous, Petra Schutrops (Neighbouring Landowner of Bushmans Gorge Lodge and Settlers Safaris hunting outfit)	The N2 between Grahamstown and Peddie is already a very dangerous stretch of road, this can be seen in the amount of accidents and fatalities. Erecting turbines visible from the N2 will distract the drivers' attention and cause even more accidents along this road. I presume the turbines will have signal lights on top, this will be light pollution and an eyesore in the evenings as a big part of our advertising is to be away from man made things and to be out in the bush.	14/12/2011	CES: Signal lights are required on top of the turbines (on the nacelle) as part of the Civil Aviation Authority regulations. .
O. Crous Neighbouring Landowner	Specialist visual impact report – 26km away has been scanned, but not the farm next door?	17/05/2012 Via Public Meeting	CES: These photomontages has been supplied as requested.

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	Other farms have been included but not the farm right next door.		
Dave Young Director: George Building Supplies (Pty) Ltd	<p>The significance of the adverse effects of these wind turbines from a visual impact and intrusion point of view are as follows:</p> <ol style="list-style-type: none"> 4. The current and future value of the surrounding farms will be significantly reduced as a consequence of having to look at these huge turbines. If anyone has any doubt as to the size of these behemoths then drive to Port Elizabeth and have a look at how just one of these monsters dominates the surrounding area. Who wants to buy or own a property looking onto this proposed scheme vs. the current bush covered rolling hills. 5. Those operations dependant on hunting as a source of income will be negatively affected. Hunters, especially foreigners whom many of the farmers depend on for an income, will certainly not choose an African bush experience staring at a landscape dominated by large spinning turbines. These clients will go elsewhere. 6. Eco tourists would far prefer to look at scenic hills rather than spinning turbines and they will also take their business elsewhere. 	21/05/2012 Email	CES: Please refer to SEIA
Murray Crous Settlers Safaris/Honeykop Lodge	Visual pollution will be considerable and will in all probability make it more difficult if not impossible to sell eco -tourism and safari operations on its property and will most certainly reduce the value of its considerable investment in land	04/06/2012 Email	CES: Please refer to SEIA

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Murray Crous (Settlers Safaris/Honeykop Lodge)	Which buildings will experience shadow flicker? What will the shadow flicker on Honeykop lodge be like	10/06/2012 Email	CES: The revised layout results in no residences being subject to more than 30 hours per year or 30 minutes on the worst day..
XXL Game Reserve (Pty Ltd)	A concern was raised with regard to the visual impact and how this will affect the hunting industry of the area	18/06/2012	CES: Please refer to SEIA
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	Referring to the following excerpt from the Visual Impact Assessment, “the main opposition to the wind farm is likely to come from game farm (and to a lesser extent, eco-tourism) who feel that highly visible wind farms will have a negative impact on tourism to the region. The study area has a large number of game farms, and there will be areas on these farms where wind turbines will intrude on views and viewpoints”, Mr Moll states “having noted this significant impact the EAP failed to canvass the concerns of the affected community. We submit that this is a fatal flaw and grounds on which to reject the project”.	06/09/2012 Written	CES: The PPP conducted by CES exceeded the minimum requirements under NEMA, evident by the additional public meeting held on the 23 rd January 2012 to engage with the Coombs Agricultural Association as well as the extraordinary meeting held with Mr Pieter Moll, Dave Young, Adri Timm, Orgie, Murray & Petra Crous on the 4 th June 2012. An additional photomontage was commissioned upon request from Orgie and Murray Crous. Several members of the Coombs Agricultural Association are involved in the game industry and the wind farm was on the agenda of meetings held on the 23 rd January 2012 and the 25 th April 2012. Notice of meeting and agendas were emailed on the 19 th of January and the 19 th April 2012 respectively and included distribution to Mr Dave Young (for both meetings) and Mrs Adri Timm (for the 25 th April meeting only). Please see Appendix D for copies of emails, agendas, minutes and attendance registers). Please also refer to the SEIA and CNA subsequently conducted, and which findings are included in the revised final EIR. It is therefore our belief that no fatal flaw exists for this project.

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<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>With reference to the Author of the Visual Assessment: "...Notwithstanding the above the author also makes the statement "The landscape of the study area is not particularly pristine or scenic, and should be able to accommodate a wind farm." This is a purely subjective statement and cannot be substantiated."</p>	<p>06/09/2012 Written</p>	<p>CES: The study area has been highly impacted by agricultural activities, detailed in vegetation maps, bioregional conservation plans and relevant academic literature.</p> <p>Plan 8: We disagree. This can in fact be substantiated in some detail: The site is directly intersected by the N2 National Highway, which carries a large quantity of heavy traffic, including a good quantity of commercial trucks. As such, it is already a source of considerable noise and light emission. The presence of a national highway and its associated traffic alone makes a strong argument for the site not being "pristine". In addition, the site was chosen due to the current existence of Eskom High Voltage lines that traverse the agricultural land, creating visual disturbance. There is also the presence of an active kaolin mine, which has made a large impact on one of the portions of land. This too, adds to the argument that the area is far from pristine.</p>
<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>The Provincial Andries Vosloo Kudu and Double Drift Game reserves are located no more than 10 km from the proposed wind farm and the Kap River Nature Reserve some 20 km away. It is likely that the turbines will be visible from all locations mentioned.</p>	<p>06/09/2012 Written</p>	<p>CES: The Provincial Andries Vosloo Kudu and Double Drift Game reserves are now part of the Great Fish River Nature Reserve and the closest point of the reserve to the project boundary is 12.78 km. The closest point of the Kap Nature Reserve is 23.9 km away. The Revised Final EIR has been submitted to EC Parks for comment.</p>
<p>Crous Family Landowners (Honeykop Farm)</p>	<p>We are very pleased to see that some of the turbines that were supposed to be erected on Gilead farm close to our lodge have been removed or moved to other locations. We would like to be advised how far the closest turbines will be erected from our lodge on Honeykop farm.</p>	<p>03/10/2013 Written</p>	<p>CES: Noted. The closest turbine is now 1537 m from the lodge on Honeykop Farm.</p>

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Crous Family Landowners (Honeykop Farm)	It is a major concern for us that the turbines we were told to be erected are now replaced by a larger model. The visual impact that we were expected to incur might now not be a realistic picture as painted in your original EIA	03/10/2013 Written	CES: As detailed in the technical specifications of the N117 turbine, the hub height has dropped to 91.5 m while the rotor diameter has increased to up to 117 m, resulting in a negligible net visual effect from the original proposed turbines. This has been verified by the visual specialist.
6. LAND USE			
A Timm (Huntshoek Lodge cc Edcot Trust t/a Huntshoek Safaris)	Would a project of this nature guarantee NO decrease in the value of land, or can it guarantee the increase in value of land? We fear none of the above is possible. The negative impact on investment return is great, as future investors would not want to purchase land that overlooks an “industrial area” or a farm that would not be able to benefit from tourism and hunting. Tourist and hunters would be scared off by the visual impact these monsters will have on their “African safari” and most certainly start looking at alternatives.	04/06/2012 Written	CES: Please refer to SEIA
7. NOISE			
O. Crous (Neighbouring Landowner)	I want to know what the noise level would be if the wind blows in the direction of my homestead	12/12/2011 via email	
Murray Crous Petra Schutrops Neighbouring Landowner of Bushmans Gorge Lodge and Settlers Safaris hunting outfit	Our lodge is only 200 meters from the boundary fence with Gillead and so the noise pollution of this project is also really bothering us, especially as the lodge is also serves as our home	14/12/2011 via email	CES: The closest turbine is now 1537 m from the lodge on Honeykop Farm.
Crous Family Landowners (Honeykop Farm)	The noise factor is still a mayor concern for us, eventhough portrayed to make less noise, the reality is that these turbines make a noise, as we now have experienced in real life by actually visiting the Coega wind turbine. Not so much the noise of 1 turbine is our concern but the	03/10/2013 Written	CES: According to the Noise Impact Assessment, “The noise produced by the Nordex N117/3000 wind turbines will not exceed the 45dB(A) day/night limit at the identified noise sensitive areas” and “The impact of low frequency noise and infra sound will be negligible and there is no evidence to

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	<p>combined noise level of all 22 turbines together and its effect on the breeding behaviour of our rare species of game. As this has been identified in Scotland, the argument that we don't have any windfarms in South Africa and thus no scientific research to compare it too doesn't mean that it won't have any effect on our game species. Due to the small size of our farm the game won't be able to migrate far away from the turbines.</p>		<p>suggest that adverse health effects will occur as the sound power levels generated in the low frequency range are not high enough to cause physiological effects”</p>
<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>In reference to noise mitigation strategies: “In operational phase, noise impacts are rated as high without mitigation, and low with mitigation. We fail to understand how the impact rating can go from high to low with the only mitigation suggested being monitoring of noise levels where the noise at two residences was found to exceed acceptable levels in the modelling stage.”</p>	<p>06/09/2012 Written</p>	<p>CES: The revised layout using the Nordex N117/3000 turbine has reduced the impact without mitigation to Moderate negative. This is because the number of WTGs have been reduced to 22 and the location of the WTG's have also been amended.</p> <p>Plan 8: This point is noted. Considering the large distances involved, it is extremely unlikely that any noise pollution will be caused by the project. However, to answer the question raised: There are various ways to mitigate noise after monitoring. For example, specific turbines can be switched off at times of peak noise generation. However, we have also taken further noise mitigation measures in the turbine placement reflected in the final site development plan (SDP).</p>
8. AVIFAUNAL & BAT			
<p>O. Crous (Neighbouring Landowner)</p>	<p>Has any studies been done on the affect or disruption of birds in particular protected birds of prey such as black eagles, crown eagles and martial eagles which breed around and on the properties effected by the project.</p>	<p>12/12/2011 via email</p>	<p>CES: A 12 month pre-construction bird monitoring programme is considered mandatory by DEA for all wind farms in the country and has been recommended for this project. We have also recommended a 12 to 24 month post-construction</p>

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Murray Crous, Petra Schutrops (Neighbouring Landowner of Bushmans Gorge Lodge and Settlers Safaris hunting outfit)	Will these turbines affect the bird life and bats in our area? A lot of our clients are bird watching enthusiasts. Protected species such as Black Eagle and Crowned Eagle nest and rear young on Gillead, one of the proposed properties for this project.	14/12/2011 via email	monitoring programme. CES: A 12 month pre-construction bird and bat monitoring programme is considered mandatory by DEA for all wind farms in the country and has been recommended for this project. We have also recommended a 12 to 24 month post-construction monitoring programme.
Dave Young Director: George Building Supplies (Pty) Ltd	For information purposes I would be interested to hear what effects, if any, that these turbines will have on the night owls, Bustards, fledgling raptors and slow flying Knysna Loeries that are common in the forested areas which occur in the immediate vicinity of some of the proposed turbines.	21/05/2012 via email	CES: A 12 month pre-construction bird monitoring programme is considered mandatory by DEA for all wind farms in the country and has been recommended for this project. We have also recommended a 12 to 24 month post-construction monitoring programme.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	The Moll Letter Further extracts from the Avifaunal Report, in reference to the risk on bird life.: ""High risk sections of line can only be identified once the route of the power lines is available" and further goes on to state: "Collisions and electrocution with power lines is a major impact of wind farms. If this data is not yet available, the author is not in a position to rate Impacts. This Is a flaw in the assessment process. Granting an authorisation without complete Information would be contrary to the purpose of an EIA and to the legislation"	06/09/2012 Written	CES: The proposed connection between the substations and the existing 132 KV overhead line is via an overhead 132 KV section of cable, either 370 m or 580 m long (depending on which alternative is selected). The design of the of the overhead section will be approved by avian and bat specialists. Plan8: It is worth noting that the cautionary note of the avifaunal specialist was rightfully expressed in the event that the project was to construct any new overhead power lines. However, in this case the project will be cutting into 132KV existing Eskom power lines, which are already on the property, so Moll is incorrect in stating that there was incomplete data in order to assess bird impact, as the route of the HV lines already exist and can

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			<p>therefore the risks can easily be assessed. In any case, further pre-construction bird and bat monitoring is designed to assess just such potential risks.</p>
<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>The Best Practice Guidelines for Avian Monitoring and Impact Mitigation at Proposed Wind Energy Development Sites in Southern Africa by Jenkins, van Rooyen, Smallie, Anderson & Smit; 2011, states that there should be 12 months of data collected by the monitoring programme prior to environmental authorization of projects.</p>	<p>06/09/2012 Written</p>	<p>CES: These are currently guidelines. A 12 month pre-construction bird monitoring programme is considered mandatory by DEA for all wind farms in the country and has been recommended for this project. We have also recommended a 12 to 24 month post-construction monitoring programme.</p> <p>Plan8: These are simply guidelines and not regulations. We develop our projects strictly within the requirements of the law and the demands of NEMA. We follow industry standards in project development, which at the current time dictate that monitoring programmes are completed pre-construction in order to inform turbine placement and micro-siting.</p>
<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>“We fail to see how impacts can be rated if one does not know what species occur, the presence of flyways and so on. It is no use determining this post-authorisation in an area that is clearly sensitive (i.e. 229 possible species, of which 13 are on the red data list)?”</p>	<p>06/09/2012 Written</p>	<p>CES: The mandatory 12 month pre-construction monitoring will elucidate what species occur in the project area and which flight paths they utilise. We have also recommended a 12 to 24 month post-construction monitoring programme.</p> <p>Plan8: In fact, information on species has been provided in detail and we are confident in the work provided by the specialists. As a course of prudent action, we are acknowledging a window of uncertainty, which is what the long-term monitoring</p>

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			programmes are there to address The risk of uncertainty is something that all renewable energy facilities carry until construction begins. Whilst this is not ideal for project developers, as it loads their project with risk, it is the state of project development at the moment and a part of the reality of the market.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	We are of the opinion that once a turbine has been erected, it cannot be relocated. It is also unlikely that the wind farm will be monitored during the operational phase.	06/09/2012 Written	CES: It is the purpose of the 12 month pre-construction monitoring programme to inform the micro-siting of the turbines, which happens prior to construction. We have also recommended a 12 to 24 month post-construction monitoring programme.
Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)	It is critical that the issues addressed in both the bat and avifauna reports be addressed in a full and comprehensive manner prior to granting an authorisation.	06/09/2012 Written	CES: Noted. See response directly above.
9. SOCIAL			
O. Crous Neighbouring Landowner	Regarding the 2% benefit to the community, I feel it should be benefiting the surrounding community who are affected by the project and not some distant urban community who are not affected by the project.	12/12/2011 via email	CES: Please refer to SEIA & CNA
10. INFRASTRUCTURE			

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<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>The EIA has been undertaken without consideration of the transmission lines that will be required. No mention is made of any expansion of the grid. The question that one needs to ask is what will the impact of the transmission lines and the expansion of the grid have on neighbouring properties and the game, hunting and tourism industry.</p>		<p>CES: The proposed connection between the substations and the existing 132 KV overhead line is via an overhead 132 KV section of cable, either 370 m or 580 m long (depending on which alternative is selected). The design of the of the overhead section will be approved by avian and bat specialists. Apart from this, Plan 8 has not proposed any expansion of the existing grid.</p>
<p>Pieter de Villiers Moll Landowner (Trumpeters Drift Farm 612)</p>	<p>in relation to adjusting turbine locations during the EMP, Moll asks, “We question why this must only be done during the EMP phase or after pre-constructive monitoring. The purpose of an EIA Is to evaluate risk and this cannot be done without the necessary Information. This is a flawed approach.”</p>		<p>CES: The risk was assessed in the Avian specialist report, and the risk of collision with turbines was rated as “MODERATE NEGATIVE”, with and without mitigation.</p> <p>Plan 8: This is a comment on process and is therefore simply an opinion. The reason turbine placement is evaluated after monitoring is that the monitoring informs the placement and allows one to mitigate negative impacts.</p>

APPENDIX D-10: COMMENTS REPORT (ISSUES AND RESPONSE TRAIL) FOR THE SOCIO-ECONOMIC IMPACT ASSESSMENT AND COMMUNITY NEEDS ANALYSIS

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1. GENERAL			
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	In light of the potential socio-economic impacts associated with the proposed project, the FEIR was required by DEA to be supplemented with a socio-economic assessment. On this basis, the SEIA and Needs Analysis were prepared by Urban-Econ with a view to supplementing the FEIR.	03/10/2013 Written	Urban-Econ: The Needs Analysis, although completed by Urban-Econ should not be viewed as a complementary or supporting document to the SEIA. The Needs analysis is prepared to assist the IPP in identifying potential social investment areas in order to fulfill the requirements of the DoE's REIPPP. It is for the IPP at a later stage to commit to the development and support of specific social and economic projects.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	As will be demonstrated in detail below, it is apparent from the Review that the information provided in the SEIA is inaccurate and/or deficient insofar as the potential impacts of the proposed project on the local game farming industry are concerned, while certain substantively relevant considerations which should have been addressed in the SEIA have been overlooked or inadequately considered. In addition, the extent of the socio-economic benefits associated with the proposed project appears to have been overstated (based on an analysis of the proposed initiatives).	03/10/2013 Written	Urban-Econ: Noted, however later disputed.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	It follows that insofar as the FEIR is supplemented with the findings of the SEIA, it will not provide a sound basis for DEA to render a decision in respect of the application which accords with the requirements of sustainable development.	03/10/2013 Written	Urban-Econ: Noted, however later disputed.
The Crous Family	We are disappointed to see that no projects have been included closer to the site of the windfarm that benefits the community that will have to reside directly near the windfarm besides the educational centre, which in my opinion will not benefit the rural community. Most funds have been allocated towards this project while in our opinion agri cultural projects would benefit the local community more. The Green Hills farm which is already bought by the government and is in a terrible state of neglect	03/10/2013 Per email	Urban-Econ: Community needs analysis and assessment p.37 "The projects presented are based on the area's latent strengths and weaknesses. The projects are seen as responses to opportunities and threats to social and economic development

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	<p>would be a possible location for such a project.</p>		<p>within the region: the projects were selected based on factors such as the potential population that would benefit, minimum settlement size thresholds for projects to succeed, market linkages, community buy-in and institutional support. The approach was to identify and select those projects that would yield the greatest economic and social rates of return, whilst minimising any potential negative externalities. Sites close to the wind farm unfortunately have lower population densities than those selected in the final document. As it is recognised that the impact of the wind farms will be felt throughout the Makana Municipal area, the projects were not limited to only the vicinity of the proposed wind farm, but included the entire Makana Municipal area”</p>
<p>The Crous Family</p>	<p>Firstly the report mainly focuses on the visual impact that the affected parties will experience. This is an important factor but definitely not the only concern we have. The noise factor as mentioned before and its potential influence on the breeding patterns of our rare species of game are a major concern not just during the construction phase but also during the operational stage of the project.</p> <p>The report indicates in paragraph 4.2 that farming operations will be able to continue during the operational phase but this is debatable for game farming and the breeding of rare game species. The losses could be disastrous for us as Black Impala sell for from R250 000 each and Golden Wildebeest from R350 000 each.</p> <p>The same paragraph also states that the chief concern of the trophy hunter is the quality of the trophy. That might imply that the hunter would be fine with shooting his trophy in a cage. This is a ridiculous statement as most of our clients are from Europe where record books don't count and the experience of the hunt is the most important factor in their satisfaction rating. A large percentage of our clientele are not trophy hunting but management hunting where the entire experience is based</p>	<p>03/10/2013 Per email</p>	<p>Urban-Econ: No studies regarding the impact of noise pollution from wind energy facilities of this scale on animal breeding were found at the time the report was written. Urban-Econ would welcome any academic studies from the Crous family that support the comments above .</p> <p>The report provides for different sensitivity levels of hunters to the construction and operation of the proposed wind farm. Scenarios thus exist for situations in which hunters are not significantly affected by the presence of wind turbines, as well as situations in which hunters are significantly affected by the presence of wind turbines. Furthermore the report provides for</p>

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	on them having a good walk and stalk in the bush. A windfarm will definitely destroy that being a positive experience.		different levels of sensitivity to wind turbines between local and international hunters. P.30-31
The Crous Family	Another concern that is underestimated in the report is the strain the influx of people during the construction period of the project will have on the accommodation, service provisions and infra-structure of Makana municipality and Grahamstown in particular which the report is indicated as medium. As it is Grahamstown has been without water for 7 days with a municipality that isn't able to provide its residents with basic services due to a lack of skilled personnel.		Urban-Econ: The project will to a great extent employ locals from Grahamstown and the surrounding villages- as such no significant surge in population numbers is anticipated
The Crous Family	How is a municipality that can't fill its own open positions for engineers as indicated on Carte Blanche last Sunday supposed to provide local skilled staff for this project. Especially as there are only a few windfarms in the country. Most of the knowledge will have to come from overseas. It should be stipulated that a certain percentage of the staff must come from South Africa and non-skilled staff should be sourced locally within the Makana municipality and immediate surrounding of the windfarm		Urban-Econ: Staff will come from the Makana Municipal area, not the Makana Local Municipality (the legal entity of local government). As such, the Makana Local Municipality's human resource capacity constraints will not negatively affect the ability of the wind farm developers to attract and retain human resources for the construction and operation of the proposed wind farm.
The Crous Family	We strongly disagree with the impact assessment on land values. The article insinuates that only 1 study concluded that land values will decrease while there are several studies that show no impact. There are numerous studies that indicate a decrease in landvalue in the immediate surrounding of the site. Many of them were mentioned at the public meetings we have had in the past. For example, the LNBL report published in the USA in August this year dismisses this aspect as a 'concern', even though the studies reveal a 28% decrease in value of the properties within a mile radius. We consider this a significant decrease and strongly insist on compensation as suggested in the report in the mitigation actions. The argument that the farmers are benefitting as mentioned in page 48 only applies to 3 land owners.		Urban-Econ: We would request that such studies be provided to Urban-Econ. As the SEIA states on p.48 "Given the small number of operational facilities assessing the impact of wind farms on property values using empirical evidence is exceptionally difficult. There are also no known domestic studies that investigate the impact of wind farms on property prices. Several international studies however have been conducted but many of these studies reveal conflicting results"
The Crous Family	In the recommendations of this report it is acknowledged that this area has undergone a serious boom in the tourism and hunting sector. We feel that the 200 million per annum that this report implies is going to be		Plan8: The GTWF site was selected by Plan 8 as a prime location for a wind farm because the wind resource is

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	<p>generated could easily be generated elsewhere while leaving this area to develop its current tourism and hunting Industry which is a much more labour intensive industry than the windfarm. Which will only generate 8 to 10 permanent jobs in the operational stage, the same amount of jobs will be lost at our business if the windfarm decreases our client numbers with the expected 60% indicated in the report. The report indicates that tourism's staff to revenue ratio is 1 to R1 million, an underestimated figure as this is a service providing industry with direct contact with the consumer. The windfarm's ratio will be 1 to R8 million, the argument that this project will generate many jobs is only on a temporary basis during construction phase and not durable.</p>		<p>extremely good, the proposed wind farm will have a grid connection on site which avoids construction of long HV lines, the receiving environment is suitable as evidenced by the avifauna, heritage and agricultural specialist studies. The wind farm will also be major contributor to the local economy and will be able to co-exist with the tourism industry, as evidenced by the SEIA. Plan 8 is therefore of the opinion that the wind farm will have a positive impact for local and national benefit.</p>
The Crous Family	<p>The report keeps referring to the fact that the revenue generated by tourism and hunting is an estimation and based on the surveys done in the area. The same can be said of the figures provided by Plan 8, as their income is based on what Eskom is willing to pay for the electricity, at our last public meeting this figure couldn't even be given, as well as these turbines production is unreliable since they are dependent on wind. No wind no electricity, too much wind the turbines will cut out. So how realistic can their figures be?</p>		<p>Plan8: Because of the competitive nature of the DoE REIPPP, the price paid by the SA consumer for wind energy has reduced dramatically over the past three bid rounds. The GTWF is located in an area with fantastic wind resources, Plan 8 will be able to deliver a highly competitive rate to the DoE because of this. Plan 8 has measured the wind resource for the past 2 years and will be able to base its financial model on very robust data. Social economic objectives such as enterprise development, local ownership and job creation have been accounted for in the model, and it is guaranteed that at least the minimum qualification targets published in the RFP, 2011 will be met. However, it is the objective of the project to reach the target economic development goals by accessing project finance that enables a highly competitive bid submission and selection of the project by the DoE.</p>
	<p>On page 69 the report mentions a percentage of 70 to 90% of tourists that are not overly concerned by windfarm extracted from a NFO Worldgroup study. In my opinion this number gives the wrong</p>		<p>Urban-Econ: Whilst this anecdotal evidence contradicts the quoted study results, it must be noted that the NFO</p>

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	impression as it doesn't specify which type of tourists were studied. This can definitely not apply to our type of industry as not a single one of our clients has not raised concerns about staying and hunting in the direct vicinity of a windfarm.		Worldgroup study is based on academically sound methodologies (surveying 266 respondents) that ensure that biases from subjectivity are eliminated.
	We feel that just because the windfarm project is beneficial to South Africa on a national level we should just accept the loss of our and our staffs livelihood, land value and quality of living. As this area has proven to be growing and developing in the tourism and hunting industry we strongly advise that a windfarm project should not be erected. The report mentions on page 47 the Coega windfarm which currently is only one turbine located in a undeveloped IDZ, projects such as this one are much more in place on such locations where there is space for a windfarm on a much larger scale then the suggested 22 turbines surrounded by industry. Like is regulation in Germany where windfarms can only be erected in Industrial zones. In our opinion there are much more reliable green energy sources that leave smaller carbon foot prints on the environment that should be explored like water energy.		CES: Noted
2. THE ROLE OF SOCIO-ECONOMIC ASSESSMENT IN ENVIRONMENTAL DECISION-MAKING			
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The national environmental management principles contained in section 2 of NEMA require that development must be socially, environmentally and economically sustainable. ¹ While sustainable development is defined in NEMA as being <i>“the integration of social, economic and environmental factors into ... decision-making so as to ensure that development serves present and future generations”</i> , section 2 of that statute goes on to state that the attainment of sustainable development requires that the <i>“[t]he social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.”</i> (Underlining supplied.)	03/10/2013 Written	CES: Noted.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The concept on sustainable development was considered by the Constitutional Court in <i>Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Department of</i>	03/10/2013 Written	CES: Noted.

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	<i>Agriculture, Conservation and Environment, Mpumalanga Province, and Others</i> ² where it was clearly pointed out that NEMA contemplates that “ <i>environmental decisions will achieve a balance between environmental and socio-economic developmental considerations through the concept of sustainable development.</i> ” (Underlining supplied.)		
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	It follows that in order for a competent authority to render a decision which accords with and properly reflects the requirements and imperative of sustainable development, it is required to be provided with all relevant information relating to socio-economic and environmental impacts (including cumulative impacts). ³	03/10/2013 Written	CES: Noted
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	On this basis, the EIA Regulations specifically require “ <i>a description of the environment that may be affected by the activity and the manner in which the physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity...</i> ” ⁴ to be included in an environmental impact assessment report.	03/10/2013 Written	CES: Noted
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	In addition, the EIA Regulations specifically require a description of the potential cumulative impacts (including indirect socio-economic impacts) associated with a proposed development to be addressed in the context of the environmental impact assessment process.	03/10/2013 Written	CES: Noted
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	While the SEIA purports to address the socio-economic considerations and impacts relevant to the proposed project, it is clear from the Review that it has failed to provide an accurate representation of certain impacts, while certain other impacts have not been (or have been inadequately) addressed.	03/10/2013 Written	Urban-Econ: Noted, however later disputed.
3. INACCURACIES AND/OR DEFICIENCIES IN THE SEIA			
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The SEIA concludes with the statement to the effect that the proposed project should “ <i>...be undertaken on the basis of its positive benefits outweighing negative outcomes accruing to the local tourism industry.</i> ” ⁵ The Review has however identified certain inaccuracies and deficiencies in the SEIA which suggest this conclusion is in fact incorrect and/or	03/10/2013 Written	Urban-Econ: Noted, however later disputed.

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	misrepresents the true nature of the potential socio-economic impacts associated with the proposed project		
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The SEIA has primarily relied on the revenue-generating potential of the proposed project in motivating for the purportedly significant positive socio-economic impacts.	03/10/2013 Written	<p>Urban-Econ: Noted, as per standard SEIA methodology. Additional revenue is reflected as an economic injection into the local economy, brought about by a once off capital expenditure inflow and a subsequent annual operational expenditure value. i.e. a change in economic activity. In addition to the revenue generating potential of the proposed project, the SEIA listed other positive socio-economic impacts in terms of changes in:</p> <ul style="list-style-type: none"> · Production (table 9, p.34) · Employment :direct, indirect and induced (Table 10 p.36) · Skills development :both permanent workers and temporary construction workers (section 5.2.1.c p.37; section 5.3.1.c p.54) · Household income/ earnings (section 5.2.1.d p.38) · Government revenue (section 5.2.1.e p.39 (section 5.3.1.e p.56) · GDP-R: both nationally and locally (section 5.3.1.a p.52) · Production/ business sales <p>Point #14 is thus misleading in stating that the SEIA has primarily relied on the revenue generating potential of the proposed project.</p> <p>15. This was acknowledged in the report, Section 4.2.</p>
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The proposed project will however have significant and adverse visual impacts on properties located in close proximity thereto, a significant number of which are used for game farming and/or hunting activities. Given the nature of such operations, it follows that the intrinsic aesthetic	03/10/2013 Written	<p>Urban-Econ: This was acknowledged in the report, Section 4.2.</p>

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	<p>appeal of the local area is directly relevant to such operations' revenue-generating capacity. Consequently, the establishment of the proposed project will have inevitable negative impacts on the local game farming industry, and the hunting industry, both of which have developed significantly in the affected area in the past decade.</p>		
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>While the SEIA has sought to assess such impacts, it is apparent from the Review that the conclusions reached by Urban Econ are inaccurate and misrepresent the true extent of the potential impacts, particularly insofar as potential impacts on the revenue generating capacity of the local game farming operations are concerned. The findings of the Review in this regard are summarised below:</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Disputed. The accuracy and representation of potential impacts of the proposed projects (including revenue generating capacity of the local game farming operations) is informed by the surveys administered by Urban-Econ to local stakeholders (which include but is not limited to farms listed in 'Annexure A'). Calculations, data and figures presented in the SEIA are based on results of this survey. Reference to this methodological assumption is made in sections:</p> <ul style="list-style-type: none"> · 1.3.2 · 1.3.3 · 3.4.2 · 4.2.1 · 5.2.2.e · Chapter 6 p.69 <p>Any alleged inaccuracies or misrepresentations in subsequent data presented are a result of inaccuracies or misrepresentations by survey respondents. It is also worth noting that not all stakeholders were willing to complete the survey administered.</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i>.</p>	<p>16.1 The SEIA indicates that the potential net costs/benefit associated with the proposed project will be a benefit of around R10.27 million (with potential revenue losses of 0.92 million and 6.13 million in respect of domestic and international turnover, respectively)6.</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Regarding the potential annual average revenue from the Grahamstown wind farm listed in Table 9, the review indicates that 'none of this revenue will be of any benefit to the local</p>

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			<p>community or any stakeholder within the Makana Municipality' the Figure of R230.29 million relates to the Grahamstown wind farm, the figure of R0.92 million relates to an average local hunting /tourism property surveyed and the figure of R6.13 million relates to the combined potential loss. It is thus incorrect the add together figures of R6.13 million and R0.92 million in Table 10 as the figure of R6.13 million already accounts for losses to entities that have an average revenue of R0.92 million. i.e. the average annual figure is already included in the potential annual losses figure (as the latter is a function of the former). This is double counting, and thus the figure of R10.27 million is incorrect. Table 13 does not indicate 'that the potential cost/benefit associated with the proposed project will be a benefit of around R10.27 million.</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>According to the SEIA, the above estimates are based on an average annual turnover of R 891 871 <i>per</i> farm owner, and the assumption that 13 farm owners will be affected by the proposed project.7</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Correct, 13 farmers, many of which own far more than one single property or land portion. As described on page 24, " <i>It is important to distinguish between farm portions and farm owners. One farm owner may own several farm portions of one or multiple farms. As such, the number of farm owners listed in the table above is not a direct indication of collective or total</i></p>

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Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The Review has recalculated the potential economic impacts associated with the proposed project based on 27 properties as opposed to 13 on the basis that an average annual turnover of R 891 871 <i>per</i> property (rather than <i>per</i> land owner) would be a conservative estimate in respect of the 27 farms in the affected area.8	03/10/2013 Written	ownership of farms in the region. " Urban-Econ: This assumption is flawed, as clearly described in the paragraph above the R891,871 annual average revenue reflects the revenue generated per farmer (no matter how many land portions or properties he/she may own). Any subsequent calculations based on 27 properties, are thus irrelevant. The annual average revenue was directly informed by the outcomes of the one-on-one surveys conducted. The review does not indicate which 12 farm owners are considered, and also does not state which 27 farms are referred to . It is worth noting that the area of the properties displayed in Map 3 of the SEIA range from as low as 4.3 ha (farm number/portion: 366/5) up to 2,285 ha (farm number/portion: 217/0) (source Urban-Econ: Makana Local Municipality Albany farms valuation roll 2008,2010,2010a, 2011, 2011a, 2012, 2012a). This represents a high range of size. As such, a 'one-size fits-all' approach as adopted in the Review is thus unsuitable for calculating average annual turnover per property. An assumption that a property as small as 4.3ha would have the same capacity to generate revenue similar to a property of 2 285ha is inaccurate. The figure of R891 871 per property quoted in the SEIA is based on primary research undertaken in the area, rather than generalisations as provided in the Review of the SEIA
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	It is clear from the revised calculation undertaken in this regard that the SEIA has underestimated (and understated) the total revenue value of	03/10/2013 Written	.

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	<p>the game farming operations located in the affected area, as well as the potential negative consequences which the proposed project is likely to have as follows:</p> <ol style="list-style-type: none"> 1. Based on an annual <i>per</i> farm turnover estimate of R 891 871 (properly calculated with reference to 27 farms as opposed to 13 as the SEIA would have it) the Review finds that the annual turnover for the affected properties is in the region of R24.08 million.⁹ 2. Using the methodology applied by Urban Econ (for purposes of consistency) with reference to the revised total annual turnover for the affected properties, the Review finds that the potential annual turnover losses associated with the proposed project will be 3.48 million and 21.1 million in respect of domestic and international turnover, respectively.¹⁰ 3. On this basis, it is concluded in the Review that the net effect of costs/benefit associated with the proposed project will be a net loss of R 7.17 million (i.e. a discrepancy of roughly R 17.44 million from that estimated in the SEIA).¹¹ 4. The inaccuracy of the SEIA in this regard is also demonstrated by the fact that the average turnover for the affected properties as calculated based on the assumptions used in the SEIA is roughly R470 000 per annum, which is substantially lower than the annual turnover estimated in the SEIA itself (i.e. R 891 871 per annum).¹² 		<ol style="list-style-type: none"> 1. Disputed, note the above comment: ignores that fact that game hunting operations typically spread over more than one property i.e. each farm or farm portion cannot be taken as a unique revenue generating unit, but rather as part of a larger unit that makes up a game farm. 2. Disputed, note the above comment. Assumes all properties listed in Section 8.4 of the Review have similar levels of visual exposure. Map 2 in the SEIA shows this assumption to be incorrect. Urban-Econ's calculations on changes to total annual turnover factored-n the level of visual exposure that each farm is anticipated to be subjected to, whereas the Review makes no provision for this variable. The review thus assumes that all properties listed section 8.4. Will have a uniform level of exposure to the wind farm, which is incorrect. The turnover figures of R3.48 million and R17.44 million are thus to be refuted on the basis on flawed assumptions in their calculations. It is also worth noting that figures quoted for potential annual turnover losses are worst-case scenario estimated, and are thus not to be taken as fixed amounts that will occur with a definite level of probability. The probability of this occurring is reflected in

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			<p>section 5.2.2 of the SEIA. If the methodology of the SEIA is to be used, then these probabilities are also to be included in the Review.</p> <p>3. Disputed, note the above comment.</p> <p>4. Disputed, note the above comment.</p>
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	In the circumstances it is clear that the conclusions reached in the SEIA are likely to misrepresent the true nature and extent of the socio-economic impacts associated with the proposed development, as well as the net effect thereof.	03/10/2013 Written	Urban-Econ: Disputed, note the above comment.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	It is stated in the SEIA that for every R1.00 spent in the game farming industry, R1.02 of new business sales is created elsewhere in the economy through induced and indirect impacts. On this basis, it is acknowledged in the SEIA that there will be impacts to up-and downstream impacts in relation to the local tourism and taxidermy industries, as well as in the context of induced effects on local businesses.	03/10/2013 Written	Urban-Econ: This point refers to indirect and induced impacts associated with the negative economic impacts calculated in the SEIA. As noted from 16.1 above, that only the direct positive impact was compared to the reduction in revenue generation as a result of the visual impacts. Should the total negative economic impact be calculated, this number will then need to be compared with the total annual positive impact which will arise from the fully operational wind farm. This figure will then stand at R12.86 million in new business sales as a result of the injection into the economy as a result of the R230 million revenue generation. The loss of R6.13 million in revenue, even if calculated for its indirect and induced impacts will quite clearly bring about significantly lower changes (reductions) in business sales.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	However, no attempt has been made in the SEIA to quantify the potential negative impacts which the proposed project will have insofar as	03/10/2013 Written	Urban-Econ: Disputed, refer to above.

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	business activities which are directly or indirectly dependent on the game farming industry are concerned. Significantly in this regard, the Review notes that about 31% of expenditure associated with a game farm visit accrues to associated industries (including air fares; car rental; accommodation; taxidermy; and meat processing).		
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	Given the potentially significant indirect impacts which may be caused to down and upstream industries as a result of the proposed project, and the requirement in the EIA Regulations to assess potential cumulative impacts associated with a proposed development, it follows that the SEIA's failure to address such impacts will inevitably result in an inaccurate representation of the socio-economic impacts associated with the proposed project.	03/10/2013 Written	Urban-Econ: Disputed, refer to above.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The SEIA has estimated that game farming and/or tourism in the affected area (across 13 game farming operations) currently provides employment to about 136 people of which 65 are permanent positions and 71 are temporary.14	03/10/2013 Written	Urban-Econ: This figure is based on results of the survey administered
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	In applying the methodology referred to in paragraph 16.3 above (and revising the employment figures based on 27 properties), it may be extrapolated that each of the 27 farms located within the affected area currently support approximately 135 permanent employees and 148 temporary employees. In addition it is estimated that as many as 473 dependants may also be reliant on the income generated by game farming activities within the affected area.15	03/10/2013 Written	Urban-Econ: Disputed, refer to above: it is incorrect to assume that each farm portion will generate a similar number of employment opportunities given difference in farm portion size/ extent.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	The SEIA states that 25 new employment opportunities are expected to become available in the context of the proposed project of which 8-10 will be at the facility itself and a further 16 will become available within the Makana Local Municipality. It is expected that 20 - 40% of the employment opportunities associated with the proposed project will be suitable for semi-skilled and unskilled labour, while the remainder will be skilled and highly skilled.16 In this regard it is furthermore stated under the heading "Operational Phase assumptions" that 10 permanent employees will be employed at the facility and the "required workforce of	03/10/2013 Written	Urban-Econ: Noted

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	<i>the entire facility include 4 highly skilled positions (i.e. engineers, programmers), 4 skilled positions and 4 positions for security personnel, welfare officers and other general personnel".17</i>		
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	When contrasting the employment opportunity potential of the proposed project (i.e 25 positions) with the employment opportunities currently available within the game farming operations located in the affected area, it is apparent that potential impacts on the game farming industry could result in significant negative impacts on the livelihoods of persons currently employed on the affected properties, as well as their dependants. Given the limited opportunities which will be made available in the context of the proposed project (and the skills sets of the employees currently employed on the affected properties) it follows that such impacts are unlikely to be alleviated in the context of the proposed development.	03/10/2013 Written	Urban-Econ: This is based on an unfounded and un-quantified assumption that the establishment and operation of the wind farm will result in the loss of more than 25 employment opportunities in game farming operations. This is not supported by any of the references cited in the review.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	While purported positive employment contributions have been quantified in the SEIA (as described above), it is noteworthy that potential negative impacts on the employment capacity of the local game farming industry and upstream and downstream industries (as well as the associated impact on livelihoods) have not been quantified or contrasted with the purported employment benefits of the proposed project.	03/10/2013 Written	Urban-Econ: Given the complexity involved in ascertaining or quantifying the impact of the proposed wind farm on local employment, it is highly difficult to then estimate potential negative impacts on the employment capacity of the local game farming industry and upstream and downstream industries using conventional statistical or econometric methods. Regarding the associated impact on livelihoods and potential changes to employment in upstream and downstream industries , the SEIA states that <i>"If the proposed facility were to result in the loss of revenue, it could potentially be associated with the loss of employment. Alternatively, it could lead to a reduction in the salaries and wages paid to employees. Due to the multiplier effect, the decline in game farms revenue could lead to further employment losses locally and</i>

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			<i>elsewhere in the country. Since these FTE positions however represent a combination of employment person years to be lost in different sectors,</i>
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	Consequently the SEIA unduly emphasises the positive aspects of the proposed project while failing properly to address the potentially significant impact on employees currently being supported within the local game farming industry and associated industries.	03/10/2013 Written	Urban-Econ: The review unduly treats the potential negative impacts of the proposed project on employees as a definite probability
	It is noted in the SEIA that “[t]he developer should offer some form of agreement, incentive, or property value guarantee to the nearby farms to offset potential losses in property values provided they are proven to result from the establishment of the facility in the area. The nature and conditions of such agreements should be negotiated with affected land owners and should be acceptable by both parties.” ¹⁸	03/10/2013 Written	Urban-Econ: Noted
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	No information has however been provided in the SEIA or elsewhere as to any mechanisms being offered by the developer to off-set potential losses in property values. Such information is directly relevant to informing the actual socio-economic impacts associated with the proposed development. Significantly, however, the development of such mechanisms would in any event need to be informed by an assessment of potential losses in property values (which has not been undertaken in the context of the SEIA).	03/10/2013 Written	Urban-Econ: The SEIA, as quoted in point 27 states that such mechanisms would be offered provided any potential losses in property value “are proven to result from the establishment of the facility in the area”. This has not been undertaken in the Review. The SEIA did not undertake a quantitative assessment of changes in property value as it will not be possible to provide an accurate assessment of actual property value changes until the project is completed and has been in operation for a period of time. Furthermore the SEIA as quoted in point 27 states that such mechanisms “should be negotiated with affected land owners and should be acceptable by both parties”. This fall out of the scope of work of the SEIA as listed in section 1.1 (page 1) Regarding an assessment of potential losses in property values, this

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			<p>was not undertaken in the context of the SEIA as the SEIA itself states <i>“Given the small number of operational facilities assessing the impact of wind farms on property values using empirical evidence is exceptionally difficult. There are also no known domestic studies that investigate the impact of wind farms on property prices.”</i> (p. 48)</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>Although the SEIA specifically acknowledges that there will be revenue losses suffered by game farming operations, it has failed adequately to address the potential impact which the proposed project will be likely to have on the value of properties used for such purposes. As the value of a property is intrinsically linked to its revenue-generating potential, it follows that the impacts on the game farming and tourism operations in the affected area will have a substantial impact on the values of those properties.</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: The SEIA states that there ‘could’ be revenue losses suffered by game farms. The SEIA does not state that there ‘will’ be revenue losses suffered by game farms. There is a significant difference between these two statements as the former is a possibility and the latter is put forward as a certainty. Regarding revenue losses suffered by game farming operations based on the value of a property, the SEIA on page 40 cites Dent and Sims, 2007 , Sterzinger, Beck & Kostiuik, 2003, Duponts, 2009.</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>The SEIA states that <i>“[t]he value of crop and stock farms located in the area could be negatively affected by the proposed activity. In the likelihood of this happening the impact would most likely be small and short-lived”</i>. This will not however be the case with regard to properties used for game farming given that the aesthetic appeal of such properties is directly relevant to their revenue generating capacity and consequently, the value thereof.</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Disputed, refer to citations listed above.</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>While significant capital investment has taken place in order to establish the game farming operations located in the affected area, it is estimated in the Review that each of those operations could be valued at around R42 million. In addition it should be noted that while revenue generated from livestock and crop farming is unlikely to match that generated by game farming, significant infrastructure investment (including fencing</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: The value of operations of R42 million per farm portion is disputed on the basis that it assumes that all farm portions are of similar size, which is incorrect.</p>

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	and equipment requirements) would also be required in order to transform affected properties for crop and/or livestock farming.		
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	While the SEIA acknowledges potential revenue losses associated with the proposed project, it has failed to address potentially substantial impacts on property values which may be associated with the visual impact of the proposed project. In this regard it is clear from the Review that there may be potentially significant impacts on local property values, and that such impact and/or potential mitigation measures have not been assessed in the SEIA.	03/10/2013 Written	Urban-Econ: On p.51 mitigation measures in the form of agreements, incentives or guarantees are recommended , should the need arise.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	Aside from the purported revenue-generation potential of the proposed project, the SEIA has also relied on the socio-economic initiatives proposed to be undertaken by the project proponent. In this regard, the project proponent has committed (in the Needs Analysis) to a range of projects and an annual expenditure on socio-economic development of approximately R11.5 million for at least 20 years. In this regard various projects and projected expenditure are listed in the Needs Analysis.19	03/10/2013 Written	Urban-Econ: Noted
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	According to the Review however, the average annual expenditure associated with the projects listed in the Needs Analysis amounts to less than R5 million, which is substantially less than the figure of R11.5 million per annum proposed to be spent. In addition, only three of the projects are intended to last more than 36 months.	03/10/2013 Written	Urban-Econ: This figure is by no means the final commitment set by the respective IPP, this final figure will only be committed once the IPP is awarded the respective contract. The stipulated amount committed per year on socio-economic development projects is mandatory if not the IPP will be penalised accordingly. Each IPP will need to comply with the conditions set under the awarded contract on socio-economic development and enterprise development contribution. The plans put forward in the Needs Analysis at this stage are indicative of the nature of projects to be undertaken and are not necessarily the final list of projects that will be undertaken. Similarly, budgeted amounts are not

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			necessarily the final costs to be committed. The plans put forward at this stage are an initial proposal based on the assessment of the area and as specified it will up to the IPP to explore other possibilities for community investment. The final project list will form part of the contract should it be granted.
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	While the extent of the proposed contribution to socio-economic development is clearly questionable, the sustainability of such initiatives also appears to be limited based on the time frames referred to in the table.	03/10/2013 Written	Urban-Econ: The projects listed in the needs analysis are in accordance with the definitions of sustainability provided in points 7, 8, 9, 10
4. IMPLICATIONS FOR THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS			
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	As described above, the proper assessment of socio-economic impacts is essential to ensuring that the competent authority is placed in a position to render a decision which accords with the requirements of sustainable development (i.e. that socio-economic and environmental factors are presented in the FEIR and considered by the competent authority in a manner that ensures that development serves present and future generations).	03/10/2013 Written	Urban-Econ: Noted
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	From the above it is clear that the information presented in the SEIA is, in certain respects, inaccurate and misrepresents the potential extent of the proposed project's impacts on the local game farming industry, while certain substantively relevant issues have been overlooked or inadequately addressed. In addition it appears that undue emphasis has been placed on the purported benefits associated with the socio-economic development initiatives intended to be undertaken in the context of proposed project (given that the extent of such contribution appears to have been overstated in the Needs Analysis).	03/10/2013 Written	Urban-Econ: Disputed, as per above points
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	Socio-economic impacts associated with a proposed development are furthermore directly relevant to the need and desirability of such a development, and the extent to which it will conform with the requirements of sustainable development. While the need for developing	03/10/2013 Written	Urban-Econ: Needs and desirability should be done but it is not part of the SEIA. It should be done at the scoping phase. so, when it gets to the SEIA it is already assumed that the motivation for

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	<p>energy generation capacity in South Africa is not in dispute, it is clear from the above that the desirability of the proposed project is questionable from a socio-economic perspective. Need and Desirability Guidelines were published (in terms of the EIA Regulations) for public comment in October 2012. Despite being in draft form, these guidelines provide a clear indication of the considerations which are required to be taken into account in the context of an enquiry into the need and desirability of a proposed development. It follows that the SEIA should provide an analysis of these guidelines in order to inform an enquiry into the need and desirability of the proposed project.</p>		<p>the need and desirability has been sufficiently addressed.</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>In the circumstances, it follows that the SEIA has failed to provide an assessment of the socio-economic impacts associated which will enable the competent authority to properly balance the relevant socio-economic imperatives with environmental considerations and to render a decision which satisfies the requirements of sustainable development.</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Disputed, as per above points</p>
5. CONCLUSIONS			
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>While the SEIA has provided information which is in certain respects inaccurate and misrepresents the nature and extent of the potential socio-economic impacts associated with the proposed development, it has also failed to address substantively relevant information which ought to have been placed before the competent authority for consideration.</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Disputed, as per above points</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>As a result, the SEIA fails to place the competent authority in a position properly to consider all socio-economic impacts associated with the proposed project in order for it to be able to render a decision which accords with the requirements of sustainable development.</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Disputed, as per above points</p>
<p>Nicholas Smith on behalf of Pieter Moll <i>et al</i></p>	<p>It follows that insofar as the FEIR is supplemented and/or revised based on the findings of the SEIA, it will be similarly compromised and any</p>	<p>03/10/2013 Written</p>	<p>Urban-Econ: Disputed, as per above points</p>

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	decision rendered by the competent authority on the basis thereof will be legally indefensible.		
Nicholas Smith on behalf of Pieter Moll <i>et al</i>	<p>It follows that any decision rendered by the competent authority in relation to the application which is based on the findings of the SEIA would be legally indefensible on the basis that substantively relevant considerations would not have been taken into account while irrelevant considerations (i.e. considerations based on the inaccurate and deficient SEIA) would have formed the basis for such decision.</p> <p>In the circumstances, it behoves the EAP to require that Urban Econ revise the SEIA to address the issues raised in these comments (as well as any other issues which warrant the consideration in the context of a socio-economic impact assessment) and subject such revised SEIA to a further round of public comment before supplementing the FEIR and placing the SEIA and FEIR before the DEA for a decision in terms of section 24 of NEMA.</p>	03/10/2013 Written	Urban-Econ: Disputed, as per above points

APPENDIX D-11: COMMENTS REPORT IN RESPONSE TO QUERIES RECEIVED FROM DEA (IN RESPONSE TO FINAL EIR SUBMITTED AUGUST 2012)

NAME	ISSUE	DATE	RESPONSE
GENERAL			
DEA, Mark Gordon	Pate 17 of the final EIR refers to a proposed 132KV overhead line and the topocadastral map on page 22 of the EIA refers to two power lines (an Eskom line and overhead power line). Please clarify if a new 132W will be constructed for the proposed wind facility and if so, what route alignments were considered or investigated for this line and also please provide the Department with the coordinates for the proposed line (Start, Middle and end point). No alternatives are discussed for this line. If no alternative route alignment were investigated please give reasons and motivation as to why this was not done.	19.10.2012	2 overhead alternatives from substation to existing 132 KV overhead line are currently considered. Please see p 18 & 19 of Revised Final EIR for description & coordinates as well as Figure 2-3 on p 20.
	Please provide coordinates and footprint details of the substation site that will be constructed within the proposed development footprint.		Please see p 18 & 19 of Revised Final EIR for description as well as Figure 2-3 on p 20.
	Concerns were raised by I&APs on the process followed in the selection of the site alternatives. The Department request that you give more detail in your Revised Final EIR on how other site locations were eliminated and the reasons (in detail) that were taken into consideration when deciding that the Grahamstown site was the most feasible, reasonable, economically and environmentally viable site for the proposed development.		Chapter 5 of the Revised Final EIR has been amended accordingly (please refer p 57 onward of Final Revised EIR as well as Appendix H on p 440)
	Please provide the Department with the final comments from Department of Agriculture, Forestry and Fisheries (Land Use and Soil Management) and also provide proof of delivery of the report to the Provincial Nature Conservation Department and Eastern Cape Parks Board.		Please see p 178 & 179 of Revised Final EIR for DAFF comment. Please see page for proof of delivery
SPECIALIST STUDIES			
DEA, Mark Gordon	I&APs raised concerns about both the fact that no Economic and Social Impact Assessment were conducted for the proposed development and the impact the proposed development will have on their game farming activities. The Department considers these concerns valid and critical, taking into consideration the fact that the area is dominated by Game Farms and also considering that the proposal might have negative impacts on such activities because of their visual impact and prominence. The Department hereby request that you conduct a cost benefit analysis study/economic and social impact assessment for the proposed project focusing on the potential impact the proposed development will have on the Game farm industry.	19.10.2012	Please refer to SEIA & CNA.
Comments and response report			
DEA, Mark Gordon	A letter was received from Moll Property Trust dated 10 June. Your comment and response report fails to address issues stated in this letter. Having gone through the report and the letter from Mr de Villiers Moll, only two of his	19.10.2012	Noted and addressed in Appendix D-10 above. Addressed in Appendix D-10 above.

	concerns were responded to. Please provide the department with a response to all issues raised by interested and affected parties.		
	A second objection letter has been received from the Moll Property Trust. This letter is attached. Please give response to all issues raised in this letter and include the response hereto in the Revised Final EIR.		Addressed in Appendix D-10 above.
	Comments dated 02 October 2012 were received from the Provincial Department of Economic Development Environmental Affairs and Tourism; please give response to issues raised in this letter as part of your Revised Final EIR.		Addressed in Appendix D-12 below.
	Our telephonic discussion with regards to the proposed change to the current project scope. The Department advises that should the applicant (Plan 8 (Ply) Ltd) go ahead with the proposed changes; it would be advisable to take the EIR out for a second round of public participation. This will also give opportunities to those land owners that have complained about not being aware of the proposed project to bring forth their views and concerns with regards to this proposed development.		The revised turbine type and layout as well as the SEIA and CNA were submitted for public review from the 3 rd September to the 3 rd October 2013.

APPENDIX D-12: COMMENTS REPORT IN RESPONSE TO QUERIES RECEIVED FROM DEDEAT (IN RESPONSE TO FINAL EIR SUBMITTED AUGUST 2012)

NAME	ISSUE	DATE	RESPONSE
GENERAL			
DEDEAT	Page ix: This Department is of the opinion that the impact of the proposed development on ecotourism and visual sensitivity of the properties in the vicinity of the site were not adequately dealt with. This is supported by the concerns raised by landowners and described in the First Paragraph on Page x and Appendix D8.	02.10.2012	Noted. This has been addressed by the Socio-Economic Impact Assessment (SEIA) and Community Needs Analysis (CNA).
	Page x: Last Sentence of Last Paragraph: This statement will first have to be substantiated after the results of the first year of the bird monitoring programme are available.		Noted.
	Page xi: Bat Impact Assessment: Third Paragraph: Does "bankability" mean "financially viable"?		Yes.

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	Page xii: First Paragraph: Serious consideration should be given to moving the turbine(s) during the micro-siting exercise so they do not affect this homestead.		Noted. This has already been addressed by the revised turbine type and layout.
	Page xii: Second Paragraph: Last Sentence: The EAPS opinion of the visual intrusion being moderate to low is contested on the basis of several objections from residents of surrounding farms. Refer to comment on Page xiii.		The revised layout has taken cognisance of the objections raised by landowners of surrounding farms, particularly those adjacent to the western boundary of the project area.
	Page xii: Fourth Paragraph: Serious consideration should be given to moving the turbine(s) during the micro-siting exercise so they do not affect the Main and Worker's Houses.		Noted. The revised turbine type and layout has mitigated all noise and shadow flicker issues.
	Page xviii: EAP's Recommendation: Bullet 5: What issues were raised by which I&APs and what changes to the layout were made?		Concerns about visual and noise impacts raised by the Crous family in particular, were addressed by moving the closest turbines east and reducing the no. of turbines to 22 (from 27).
	Page xviii: EAP's Recommendation: Bullet 6: "The development has potential environmental ... (MLM)".		Comment noted and addressed in Revised Final EIR.
	Page xviii: EAP's Recommendation: Bullet 7: "The project <u>may</u> ... ; and"		Comment noted and addressed in Revised Final EIR.
	Page xix: Second and Third Paragraphs: This Department supports these recommendations.		Comment noted.
	Page xix: Second Last Paragraph: It is suggested that the second sentence read: The project proponent must adhere to these conditions.		Comment noted and addressed in Revised Final EIR.
	Page 8: Last Paragraph: What is implied by "general authorisations" should be explained. What are the "existing sources" of water as 20379 m ³ is a large quantity of		General authorisations in terms of Section 21 of the National Water Act. The existing sources are a borehole on Tower Hill Farm. Very limited water will be utilised during the operational phase, mostly for wind farm staff domestic purposes.

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	<p>water? Far less water will be required if concrete is not mixed on site. For what purpose will water be required during the operational phase?</p>		
	<p>Page 14: Assumptions and Limitations: Please refer to our comments on Pages xii regarding micro-siting.</p>		<p>Comment noted.</p>
	<p>Page 15: Last Paragraph: Please refer to our comments on Pages xii regarding micro-siting.</p>		<p>Comment noted.</p>
	<p>Page 17: Last Sentence: It is accepted the link between the substation and existing 132 KV overhead power lines will be via an underground cable as Figure 2.4 is not very clear in this regard.</p>		<p>The connection between the substation and existing 132 KV overhead line will be via another overhead line. See Figure 2-3 in Revised Final EIR on p 20</p>
	<p>Pages 19 to 22: Figures 2.3 to 2.6: There should be some explanation of the Figures. What criteria were used to relocate the WTGs from their locality from the preliminary to final site layouts?</p>		<p>Figure caption explanations are addressed in the Revised Final EIR. Visual, noise and improved turbine technology considerations inform the final layout.</p>
	<p>Page 23: (a) Geotechnical studies and foundation works: This section raises a number of questions: How and where will the approximately 500 m³ of substrate excavate for each turbine be disposed of? What is G5 fill material? For what purpose will this fill material be used? What commercial sources could be used?</p>		<p>Spoil sites will be identified during the micro-siting process. Any existing excavated areas could be filled in and rehabilitated.</p> <p>G5 material is a classification of stone material according to pebble size (53 mm to 63 mm diameter) used for sub-base layering before foundations are cast.</p> <p>No suppliers have been contracted as of yet, however all major construction material industries could supply the material (e.g. Lafarge, Denver Quarries, Scribante, etc.).</p> <p>Borrow pits will be licensed prior to the start of constructions.</p>

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	<p>Are the commercial sources and borrow pits on site licenced by the Department of Mineral Resources?</p> <p>What will the source of the concrete be? It is preferable that the concrete is not mixed on site.</p> <p>The earth and foundation works will require that substantial quantities of material must be excavated and transported and will thus be one of the major impacts of the proposed project. This Department would like to see a separate plan being compiled to deal with this aspects.</p>		<p>It is likely that ready-mix concrete will be used.</p> <p>The spoil and topsoil management is typically dealt with in a method statement by the contractor. Spoil sites will be identified during the micro-siting process. Any existing excavated areas could be filled in and rehabilitated.</p>
	<p>Page 24: (c) Roads: It is stated that the gradient of roads "cannot be more than 6%" and "steep slopes may be need to be concreted". What is the definition of a "steep slope"? Is it more than 6%. Are there existing farm roads with a slope more than 6% that will be used?</p>		<p>In this study a slope greater than 6% (> 1:15) is considered steep. There are roads with a greater than 6 % gradient and these will be addressed in the engineering road design together with appropriate erosion and stormwater management.</p>
	<p>Page 24: (d) Construction Platform: What are the dimensions of the platforms?</p> <p>What kind of surface is required?</p> <p>Are they included in the WTGs footprints?</p> <p>What is "partially rehabilitated"?</p> <p>How will they be rehabilitated?</p>		<p>Typically, a construction platform is ± 1550 m². Please refer to Figure 2-4 of Revised Final EIR.</p> <p>Compacted soil surface on a layered sub-base.</p> <p>Yes</p> <p>The area concerned will not be fully rehabilitated due to the presence of the new structures. Rehabilitation will be done around the new structures.</p> <p>Rehabilitation will be by means of grassing the surface, utilising indigenous grass species.</p>

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	<p>Page 25: (e) Grid connection and substation: What is the size of the substation? What will it look like? The last sentence on this paragraph supports our assumption made in our comment on Page 17.</p>		<p>The substation is ± 6500 m² (in a 65 m by 100 m design). A typical substation design is detailed in Figure 2-2 of the Revised Final EIR on p 19</p>
	<p>Page 25: (f) Water use requirements: Concrete should not be mixed on site but transported in. What is the source of the water? Is the figure of 18,379 m³ over a period of 18 months correct? Will there be a conflict with water being used for agriculture?</p>		<p>It is likely that ready-mix concrete will be used on site. The “existing sources” is a borehole on Tower Hill Farm. 20,379m³ of water will be utilised over an 18 month period. No.</p>
	<p>Page 25: (g): Transport routes and volumes: A Traffic Impact Assessment will be required to make provision for the large trucks using the intersection of the access road to the N2. Site distances on this section of the N2 are short and slip lanes for both east and west bound traffic may be required.</p>		<p>A Traffic Management Plan has to be produced by the contractor and approved by the Environmental Control Officer prior to the start of construction.</p>
	<p>Page 26: 2.2.6 Refurbishment and rehabilitation of the site after operation: Are all the sites covered with grass at present? By saying that "grass is replanted in order to restore the site' appearance to</p>		<p>Micro-siting will determine what the exact vegetation cover at each turbine. This will be noted by the specialist conducting the plant “search and rescue” function prior to the start of construction and will result in a rehabilitation plan.</p>

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	<p>its original state implies this. The Ecological Specialist report states that the area is covered by fairly diverse vegetation communities. Rehabilitation should involve more than just planting grass. Before the sites are cleared plants should be rescued so they can be used for rehabilitation. A rehabilitation plan thus needs to be compiled by a specialist prior to any site clearing.</p>		
	<p>Page 31: Species of Special Concern: It would be appropriate to provide a list of the SSC and PSSC.</p>		<p>See Table 3-1 p 34 of Revised Final EIR</p>
	<p>Page 34: Maps: It is of concern that the Preliminary Layout Plan was still used to overlay (such as Figures 3.3, and 3.4) and not the Final Layout as information in the Report depicted in Figure 2.6. This makes it more difficult to assess the potential impact of the WTGs. For example, in the case of Figure 3.3, turbines are still located in Kowie Thicket.</p>		<p>Comment noted and addressed in Revised Final EIR.</p>
	<p>Page 41: 3.3.3 Animal species of special concern: Are there any species listed in the 1974 Ordinance or the ToPS?</p>		
	<p>Page 43: Figure 3.5: The light blue area is not reflected in the Legend.</p>		<p>Comment noted and addressed in Revised Final EIR</p>
	<p>Page 50: Last Paragraph: Third bullet: Below what population density does an area become acceptable for WTGs? Please explain how the population density criterion is used to decide if an area is appropriate for siting WTGs.</p>		<p>International guidelines suggest a minimum setback distance per turbine of 500 m from any human settlement. When areas are densely populated, it is not possible to achieve this.</p>
	<p>Page 50: Last Paragraph: Fourth bullet: Please expand on this criterion: "potential and appetite"?</p>		<p>The MLM has expressed support for the project, as detailed in the written communication in Appendix B.</p>

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	Page 50: Last Paragraph: Last bullet: Why in particular Port Elizabeth?		The turbine components are transported by ship to Port Elizabeth, where the transition to road transport occurs.
	Page 51: A different location: It is of concern that the environment is not one of the "main determinants" in selecting potential locations. A sustainable impact on the environment is also a "critical factor to the overall feasibility of the project".		Criteria vary at selection stages (project must first be financially viable) Please refer Chapter 5 and Appendix H.
	Page 51 and 52: A different location: More discussion on how the decision was made to choose this site for development would be appropriate. How were the three sites chosen from the 29? Where are the other two sites? Where can this study be accessed?		Comment noted and addressed in Revised Final EIR. Please refer Chapter 5 and Appendix H.
	Page 53: First Paragraph: This site layout can only be considered optimal due to the iterative nature of developing this site layout plan and after the more detailed investigations "is conducted post-environmental authorization". Is the presumption being made that the competent authority will grant the authorization (Regulation 35 (1))?		It is not assumed that a positive authorisation will be granted. The statement merely reflects the dynamic nature of the proposed development and attempts to illustrate the applicant's commitment to continuous engagement with all authorities and the public should a positive authorisation be granted.
	Page 54: Low sensitivity: Although areas may be highly impacted by current land-use, they will still provide some kind of value to ecosystem: they will never have no value to the ecosystem.		Comment noted and addressed in Revised Final EIR.
	Page 54: Last Paragraph: What does this paragraph mean?		Paragraph re-phrased for clarity.
	Page 56: 6.2 Avifauna Assessment: First Paragraph: The turbines should be moved as part of the assessment process as the Specialist was appointed to ascertain potential impacts on birds.		Turbines have been relocated in response to all specialist recommendations. A 12 month pre-construction and a 12 to 24 month post-construction monitoring programme will be conducted.

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	Page 57: Second Bullet: The Avifaunal Management Plan must be accessible to all I&APs.		Comment noted and addressed.
	Pages 58 and 59: It is difficult to read the Legends on certain Figures.		Comment noted and addressed in Revised Final EIR.
	Page 60: 6.6 Visual Impact Assessment: The Department is of the opinion that the view expressed here is subjective. A number of I&APs have expressed severe reservations of what the visual impact will have on their future ability to attract clients to visit them. One can agree that power lines and pylons have affected the quality of the landscape and views but what agricultural activities have done this? Are the impact of the agricultural activities in this area any different from other similar areas, particularly as many properties have been set aside as conservation areas (game farms). We do not have power stations and coal mines in this area of the Eastern Cape so how can such a comparison be made? How can the assumption be made that in the future "viewer will experience them as positive rather than negative additions to the landscape"?		<p>A visual assessment will always be subjective. One therefore needs to note that the goal of a visual impact assessment is not to predict whether specific individuals will find wind energy projects attractive or not. Instead, the goal is to identify important visual characteristics of the surrounding landscape, especially the features and characteristics that contribute to scenic quality, as the basis for determining how and to what degree a particular project will affect those scenic values.</p> <p>Please refer to SEIA.</p>
	Page 63: Motorists: The tall trees are alien invasive plants. There is most probably a legal requirement to remove them (CARA).		Noted. The landowner will be informed.
	Page 65: Motorists: Refer to comment on Page 63.		Noted. The landowner will be informed.
	Page 66: 6.6.5 Shadow Flicker: Last Paragraph: Consideration should be given to moving the WTG that causes the flicker.		Revised turbine type and layout have resulted in no residences receiving more than 30 min/ day or 30 hours per year of shadow flicker.
	Page 74: Construction: This Department		Comment noted.

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	supports these recommendations. Working hours should be stipulated: 07h00 to 17h00 on week days; any work on weekdays or Public Holidays should be negotiated with the landowners.		
	Page 74: 6.8 Agricultural assessment: Third Paragraph: As the soils have a high erosion index rating, the appropriate mitigation measures to prevent erosion during the construction of roads and excavation of foundations for WTGs must be prescribed in the EMP. Turbine 6 should be moved.		Comment noted – Turbine 6 has been moved in the final layout.
	Page 74: 6.8 Agricultural assessment: Fourth Paragraph: Refer to comment above.		Comment noted – Turbine 6 has been moved in the final layout.
	Pages 74 and 75: 6.9 Geotechnical Assessment: This section implies that there will be major technical and logistical challenges to upgrade access roads, excavate and cast foundations, and bury cables. All these impacts could easily have irreversible impacts on the environment if not managed properly. A separate assessment is thus required to deal with these issues. It would be a condition if a positive authorization were granted. Refer to comments on Pages 23 (a), (c) and (d). Cables must be buried. A bulldozer and a ripper must not be used due the negative impacts on the environment.		Comment noted. If the authorisation is granted, the contractor will have to submit method statements for all these activities which will have to be approved by the Environmental Control Officer prior to construction.
	Page 76: Mitigation and management: Please explain the meaning of the second sentence: "Do not remove vegetation recommended)".		Comment noted and mitigation clarified. Please see p 87 of Revised Final EIR
	Page 78: Impact 4: Loss of Thicket Mosaic: This turbine should be moved to an area of		Comment noted and addressed in final layout.

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	lower sensitivity.		
	Page 81: Impact 8: Fragmentation of vegetation and edge effects: Mitigation and management: What fences? Where are they located and what is their purpose? The turbine footprints should not be fenced.		Existing fences between properties in the project area. No turbines will be fenced.
	Page 83: Cause and Comment: Concrete should not be mixed on site. Refer to comment on Page 23 (a). What power lines? Power will be transferred to the ESKOM line via underground cables.		Noted. Power from the sub-station to the existing 132 KV overhead lines will be transmitted via overhead lines (2 alternatives are proposed).
	Page 84: Mitigation and Management: These recommendations are essential to protect sensitive bird species.		Comment noted.
	Page 89: 7.1.6 Visual: Mitigation Measures: All these mitigation measures are essential. No fires should be permitted. Smoking should be discouraged but if it takes place it should be in designated areas with fire extinguishers.		Comment noted.
	Page 91 Impact 17: Intrusion of large, highly visible wind turbines on the existing views of sensitive visual receptors: It is imperative that all these Mitigation Measures are implemented. Refer to comments on Page 60.		Comment noted.
	Page 93: 7.1.7 Agriculture: Mitigation and Management: Permits are required for the destruction or removal of any species listed in Schedules 3 and 4 of the Nature and Environmental Conservation Ordinance (No 19 of 1974), the ToPS Regulations and Government Notice 716 (7th September 2012) published in terms of the National Forest Act.		Comment noted. Revised turbine layout submitted to DAFF for comment. Their response was the same as for the Final EIR (Appendix B p 178 of Revised Final EIR).

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	Has the position of the turbines been discussed with staff of the Department of Agriculture (also recommended under Impacts 20 and 21; Page 107: 7.2.7 Mitigation Measures)?		
	Page 93: Pollution of water sources: Mitigation and Management: Construction activities adjacent to water courses should not be closer than 100m from the 1:100 year flood levels. Construction should not take place closer than 100 m from drainage areas.		Comment noted and addressed in Revised Final EIR.
	Page 94: Impact 21: Erosion and construction on land with a gradient: Mitigation and Management: The impact of WTGs on livestock and game should be monitored over the life time of the project.		Comment noted and addressed in Revised Final EIR.
	Page 96: Third Paragraph: Why is it now "understood that the developer intends to bury all power lines underground" as this was previously stated as an accepted design principle throughout the report?		All cables between turbines and substation will be buried. Connection between substation and existing 132 KV line will be overhead.
	Page 96: Impact 3: Bird disturbance and displacement from area as a result of wind turbines and other infrastructure: Mitigation: Pre-construction monitoring should be initiated at least a year before construction starts.		Comment noted. A 12 month pre-construction and a 12 to 24 month post-construction monitoring programme will be conducted.
	Page 98: 7.2.3 Bats: Mitigation and Management: All mitigation and management measures stipulated must be implemented. The Department feels strongly that curtailment must be implemented from the time WTGs are put into operation. It is a fact that bat mortalities are caused by WTGs. Why wait until		Comment noted A 12 month pre-construction and a 12 to 24 month post-construction monitoring programme will be conducted.

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	<p>mortalities reach unacceptable levels before implementing curtailment? Costs to mitigate environmental impacts must be factored into the cost of running the wind farm. If the financial viability of the project is affected then perhaps the environmental costs are too high to mitigate?</p>		
	<p>Pages 100 to 102: Noise: The WTGs should be moved further away from Peynes Kraal Farm and Workers Houses so that the day / night noise is less than 45 dB(A).</p>		<p>Comment noted. The revised noise assessment for the N117/3000 turbine together with the revised layout indicates that the noise is less than 45 dB(A) at these receptors.</p>
	<p>Page 104: Visual: Cause and Comment: The statement that the landscape is not pristine and nor valued for its scenic views is subjective. Refer to comments on Page 60. There are many features that make this area scenically very attractive.</p>		<p>The most objective way to assess the visual impact of the proposed development is to firstly characterise the landscape in terms of its defining visual qualities and assess how various objects affect these qualities.</p>
	<p>Page 105: Visual: Significance Statement: The statement that "the severity of the impact is expected to be slight since the landscape has a low sensitivity to the development type is subjective. The Department thus sees the Overall Significance as High. As little can be done to mitigate the visual impact, the Overall Significance remains High even with Mitigation.</p>		<p>Noted.</p>
	<p>Page 105: Impact 10: Mitigation Measures: Refer to the comment on Page 66.</p>		<p>Comment noted and addressed in Revised Final EIR.</p>
	<p>Page 107: Impacts on land value: "Mpumalanga"? We should accept that at present we cannot assess the impact WTGs will have on property values in the Eastern Cape. The cautionary principle should thus be applied when deciding on their locality, particularly in this area with its</p>		<p>Noted. Please refer to SEIA.</p>

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	<p>broken topography and elevated areas. They will be very visible if located in such areas and the opinion of several owners of game farms is that the values of these properties will be significantly decreased if they tried to sell them as game farms. The fact that studies in other countries indicate that wind farms have not caused property values to decrease cannot be used as an argument to motivate for their establishment in South Africa.</p>		
	<p>Page 108: Impacts on tourism: Second Paragraph: This Department agrees with the statement "it is unlikely that any study at this stage would provide an accurate assessment to which the visibility of the proposed facility would translate into a negative impact on tourism". Again, despite what studies in other countries indicate the reaction of tourists to the presence of wind farms is, extreme caution must be taken when making assumptions of what the impact of this project could be on the South Africa tourism industry. This is supported by correspondence from foreign tourists to game farms in the area that they would no longer visit the area if the WTGs were built (Pages 237 to 242).</p>		<p>The comment is noted. Please refer to SEIA</p>
	<p>Page 109: 8.1 Summary of Key Findings of the EIA: Second Paragraph: First Sentence: The second part of the sentence does not make sense; "but their . . . views." Shadow flicker: refer to comment on Page 66.</p>		<p>Comment noted and addressed in Revised Final EIR</p>
	<p>Page 109: 8.1 Summary of Key Findings of the EIA: Third Paragraph: Pile driving: refer to Page 23 where the Department requires</p>		<p>Comment noted. See response to comment on page 23 above.</p>

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	that a separate plan be compiled to deal with aspects of the foundations.		
	Page 109: 8.1 Summary of Key Findings of the EIA: Fourth Paragraph: Noise: the turbines should be moved. Refer to comment on Pages 100 to 102.		Comment noted and addressed in revised layout.
	Page 109: 8.1 Summary of Key Findings of the EIA: Fifth Paragraph: Monitor bird movements for a year prior to construction, then micro-site WTGs based on this information. Place bird markers on existing power lines running through property. Power will be transmitted in underground cables from the WTGs to the substation and from there to the ESKOM line.		Comment noted. A 12 month pre-construction and a 12 to 24 month post-construction monitoring programme will be conducted.
	Page 110: 8.1 Summary of Key Findings of the EIA: First Paragraph: Monitor bat movements for a year prior to construction, then micro-site WTGs based on this information. Refer to comments on Page 98 regarding curtailment.		Comment noted. A 12 month pre-construction and a 12 to 24 month post-construction monitoring programme will be conducted and addressed in Revised Final EIR.
	Page 110: 8.1 Summary of Key Findings of the EIA: Second Paragraph: WTGs in sensitive areas must be moved.		Comment noted and addressed in revised layout.
	Page 110: 8.1 Summary of Key Findings of the EIA: Seventh Paragraph: Due to visual impacts and concern of owners of neighbouring properties, WTGs should not be located on hilltops. The highest they should be located is on upper hill slopes. If at all possible they should not break the sky line but located with a hill slope as a back drop.		Noted. The visual impact has been addressed as far as possible in the revised layout.
	Page 110: 8.1 Summary of Key Findings of the EIA: Figures 8-3 and 8-4: Final Layout: WTGs 6 and 7 are isolated and		Comment noted and partially addressed in revised layout.

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	<p>consideration should be given moving them into groups comprised of WTGs 1 to 5 and / or 12 to 14 as the length of the service road would be reduced. The same applies to WTG 8 that could be moved into groups 9 to 11 or 15 to 19. What is the feasibility of moving WTGs 22 and 23 and locating them between 19 and 20?</p>		
	<p>Page 119: EAP's Recommendation: Third Bullet: The Department agrees that these WTGs should be moved.</p>		<p>Comment noted.</p>
	<p>Page 119: EAP's Recommendation: Fifth Bullet: The Department is very concerned that, despite the Public Participation Process, there are still a number of neighbouring landowners who only became aware of the project when the EIA Report was made available and who have major concerns about the visual impact of the WTGs on the value of their land and tourism operations. In a number of cases these issues were not resolved.</p>		<p>These issues are addressed in the Revised Final EIR and comments and response report.</p>
	<p>Page 119: EAP's Recommendation: Second Paragraph: Although this Department's generally agrees with the EAPS recommendation for the proposed Wind Energy Project the above-mentioned conflicts should be resolved before DEA makes a decision.</p>		<p>All issues raised by the authorities have been addressed in the amended comments and response report, EMP and EIR</p>
	<p>Page 120: EAP's Recommendation: Second Paragraph: The Department agrees that the project could only be granted authorisation subject to a strict set of conditions which must be initiated to mitigate potential negative impacts on the environment. All recommendations in the</p>		<p>Comment noted.</p>

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	EMP must be followed.		
	Page 120: EAP's Recommendation: Third Paragraph: The Department supports the implementation of these monitoring programmes.		Comment noted.
	<p>Pages 120 to 126: Table:</p> <p>Avifauna: Operation: Bird collisions with power lines: Power line from substation to ESKOM to be underground. Mark ESKOM power lines with collision marking devices.</p> <p>Avifauna: Operation: Bird disturbance by turbines: Monitor bird movements for a year prior to construction and the micro-site WTGs.</p> <p>Avifauna: Construction: Bird disturbance: Specialist to walk through areas pre-construction to assess if any birds are breeding and to take appropriate action (nest removal) if they are.</p> <p>Agricultural: Construction: Loss of vegetation: Permits: refer to comment on Page 93.</p> <p>Ecological: Construction: Loss of plant species of special concern: Permits: Refer to comment on Page 93.</p> <p>Ecological: Construction: Loss of animal species of special concern: Fences: Refer to comment on Page 81.</p> <p>Ecological: Construction Disruption of ecosystem function and process: Fences: Refer to comment on Page 81.</p> <p>Visual: Construction: Intrusion of highly visible construction on sensitive viewers: Flat coastal plain? This contradicts what is said on Page 110: hilltop sites?</p> <p>Bat: Operation: Bat mortalities during</p>		<p>Comment noted and addressed in Revised Final EIR.</p> <p>Coastal plain is a geological expression describing the transition between mountainous areas and the coast. These plains can contain undulating hills.</p> <p>Comment noted and addressed in Revised Final EIR.</p>

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	foraging and migration: Monitor bat movements for a year prior to construction, then micro-site WTGs based on this information. Refer to comments on Page 98 regarding curtailment.		
	Page 154 to 161: Appendix C: Plan of study submitted to DEA: Please confirm that all the issues stipulated in the DEA's letter dated 24th February were dealt with.		All issues relating to the DEA's letter dated 24 th February 2012 were originally addressed in the Final EIR submitted on the 2 nd August 2012.
	Appendix D8: 1. General: Dave Young: 06/06/2012: There is genuine concern from neighbouring landowners that if the project goes ahead the value of their land would decrease. The EIA has not addressed this issue to the satisfaction of these landowners.		Noted. Please refer to SEIA.
	Appendix D8: 2. Procedural: Murray Crous: 04/06/2012: The Department is concerned that fears of certain I&APs were not addressed satisfactorily. If the developer / EAP were aware that certain landowners had specific concerns about the potential impact why were these individuals not specifically consulted to try and resolve the issues?		Please see Issues and Response Report. The consultation process of this project exceeded the minimum legislative requirements. Affected parties were consulted and several issues addressed via the revised layout.
	Appendix D8: 2. Procedural: Dave De la Harpe: 14/12/2011: It is apparent from correspondence received from a number of I&APs that a number of landowners were inadequately / uniformed during the Public Participation Process although it started in September 2011. The EAP now know who they are and it would most probably be a good idea to individually contact them and try to resolve their specific issues.		Comment noted and addressed in Revised Final EIR.
	Appendix D8: 2. Procedural: Murray Crous,		Please see Issues and Response Report and the SEIA

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	Petra Schutrops: 14/12/2011: Where were these comments incorporated into the EIR? What was the response from DEA that a SEA should be undertaken?		
	Appendix D8: 2. Procedural: Murray Crous: 04/06/2012: The EAP should provide the information (Final Layout Plan) discussed under this Issue to I&APS mentioned in Appendix D8 so they can direct queries to DEA if they wish.		Comment noted and addressed in Revised Final EIR.
	Appendix D8: 3. Tourism and Business Operations: Murray Crous, Petra Schutrops: 12/12/2011: The EAP's response supports this Department's concern that there is simply insufficient information to assess what the impact on hunting and tourism could be.		Please see Issues and Response Report and the SEIA
	Appendix D8: 3. Tourism and Business Operations: Dave de La Harpe: 14/12/2011: This response will not go far to provide reassurance that the value of the investment in the property will not decrease.		Please see Issues and Response Report and the SEIA
	Appendix D8: 3. Tourism and Business Operations: A Timm: 04/06/2011: The same issue is raised six months later but "these comments are noted". These landowners are genuinely concerned and the EAP should at least make an attempt to resolve them. Has DEA responded to the request for a SEA?		Please see Issues and Response Report and the SEIA
	Appendix D8: 3. Visual: December 2011: O. Crous, Murray Crous and Petra Schutrops raised specific concerns. The Visual Specialist Study was completed as part of the EIA. The EAP should now answer these		Please see Issues and Response Report and the SEIA

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	questions.		
	Appendix D8: 3: Visual: O. Crous: 17/05/2012: Were the visual montages sent to this person?		Yes. Please see Issues and Response Report and the SEIA
	Appendix D8: 3: Visual: Dave Young: 21/05/2012: Concerns about property values, visual impact (also Issue 06/06/2012) on prospective hunting clients and eco-tourists should be addressed more comprehensively.		Please see Issues and Response Report and the SEIA
	Appendix D8: 3: Visual: Murray Crous: 04/06/2012: Concerns about property values, visual impact on prospective hunting clients and eco-tourists should be addressed more comprehensively.		Please see Issues and Response Report and the SEIA
	Appendix D8: 3: Visual: Murray Crous: 10/06/2012: Has the turbine layout been revised?		Yes it has. Changes have been incorporated into the Revised Final EIR.
	The last sentence on Page 66 states the house is surrounded by trees but does not confirm the layout was revised.		Comment noted and addressed in Revised Final EIR.
	Appendix D8: 3: Visual: Murray Crous: 10/06/2012: Please advise Mr Crous what provisions are made in the EIA Report for lighting.		The lights on the nacelle are required to stay on at night
	Appendix D8: 3: Visual: XXL Reserve (Pty) Ltd: 18/06/2012: Concerns about visual impact on prospective hunting clients should be addressed more comprehensively.		Please see Issues and Response Report and the SEIA.
	Appendix D8: 5. Land-use: A Timm: 04/06/2012: The concern of the impact of wind farms on property values is again raised.		Please see Issues and Response Report and the SEIA.
	Appendix D8: 6. Noise: December 2011: 0 Crous, Murray Crous and Petra Schutrops		Please see Issues and Response Report and the Revised Final EIR.

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	<p>raised specific concerns. The Noise Specialist Study was completed as part of the EIA. The EAP should now answer these questions.</p>		
	<p>Appendix D8: 6. Noise: Dave Young: 21/05/2012: Although the EAP claims no study assessed the impact noise levels will have on the breeding of game species, they should see it as an unresolved issue and do further research or recommend that a monitoring programme be initiated.</p>		<p>Monitoring programmes such as these should be subject to industry wide participation and funded accordingly.</p>
	<p>Appendix D9: Comments Report: Pages 215 to 242: Most of the issues raised in this correspondence were summarized and included in Appendix D: Comments Report. Specific comment was made on a number of these issues.</p>		<p>Please see Issues and Response Report</p>
	<p>Pages 250 to 253: Meeting Minutes: Glen Dixon: Page 250: A decision is made by the implementing authority once the EIA is submitted (R35). What is implied by "flaws"?</p> <p>A number of property owners still have major concerns ("objections") with certain aspects of the development. Refer to the comment on Appendix D8. Glen Dixon: Page 250: It is of concern that the environment is not one of the "main determinants" in selecting potential locations. Refer to comment on Page 51. Murray Crous: Page 251: Zuben did not answer the first question.</p>		<p>Flaws would refer to specific elements within the development proposal (that the development's sustainability may or may not be dependent on) or the entire development itself, which has a significantly negative, environmental impact that cannot be mitigated by any reasonable proposed intervention.</p> <p>Please refer to latest Issues and Response Report (Appendix D-9).</p>

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	<p>Ossie Crous: Page 252: Refer to comment on Appendix D8: 6. Noise: Dave Young: 21/05/2012.</p> <p>Murray Crous: Page 252: Why is it "a problem that the Eastern Cape has game and a good electricity grid?" The negative effects must be mitigated. Care must be taken not to potentially jeopardise the game industry in the project area by the erection of WTGs.</p> <p>Ossie Crous: Page 253: This was also noticed in the EIA Report. Refer to comment on Visual: Construction: Intrusion of highly visible construction on sensitive viewers: Page 124.</p>		
	<p>Pages 254 to 257: Meeting Minutes: Pieter Moll and Dave Young: Page 254: With a high technological development such as a wind farm that is novel in a rural area where game farming and tourism is an important part of the economy, it would be necessary to extend the Public Participation Process beyond the confines of the legal requirement to ensure that the developments is environmentally and socially sustainable.</p>		<p>Please see Issues and Response Report. The consultation process of this project exceeded the minimum legislative requirements. Affected parties were consulted and several issues addressed in the revised layout.</p>
	<p>Dave young, Pieter Moll: Page 255: Refer to the comments on Appendix D8.</p>		<p>Noted and addressed in Issues and Response Report above (Appendix D-9)</p>
	<p>Pieter Moll: Page 255: Did Pieter Moll submit his various concerns in writing and did the developer comment on them? It would be appropriate to discuss the technique used to locate wind farms in South Africa in Chapter 5: Alternatives.</p>		<p>Please refer to Issues and Response Report and Revised Final EIR (which includes the assessment methodology used by the developer in Appendix H).</p>
	<p>Dave Young: Page 256: It is the EAPS responsibility to undertake such studies and</p>		<p>Comment noted and addressed in Revised Final EIR.</p>

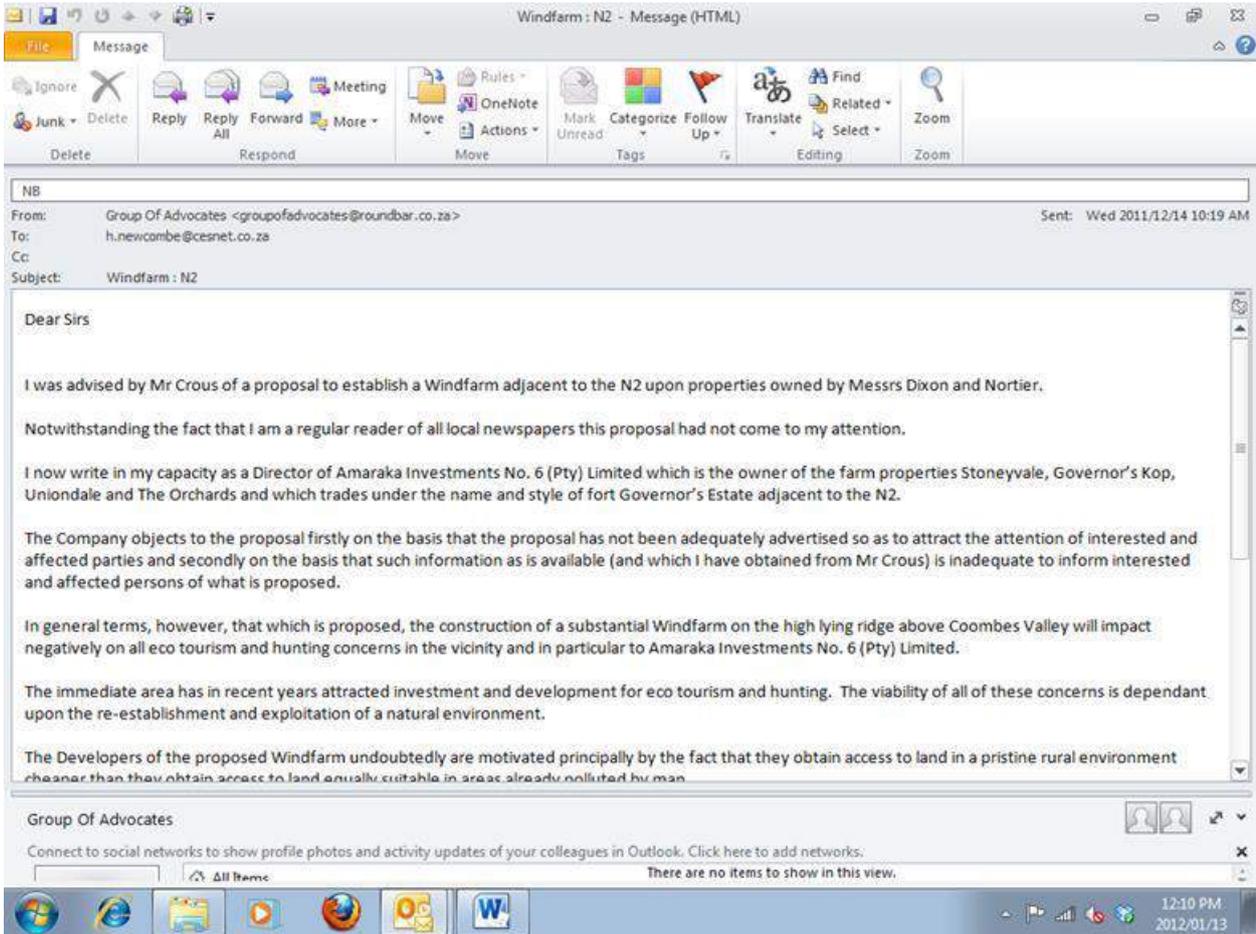
NAME	ISSUE	DATE	RESPONSE
	to appease land owner's concerns about the impact of WTGs on their property. Refer to the comments on Appendix D8.		
	Orgie Crous: Page 256: How can the response "there will be an increase in property values" be reconciled with the statement under Dave Young that "no one actually knows what the impact" on property values will be?		Please refer to SEIA.
	Pieter Moll: Page 256: R 54 (7) obliges the EAP to do this. Did CES ask Rubin if he "wants another comments and responses trail before the EIR is submitted? Refer to the comment on Pieter Noll and Dave Young: Page 254.		During the extra-ordinary meeting held at the CES offices in Grahamstown on the 4 th June 2012 (specifically arranged to accommodate Mr Moll, Mr Young and Mrs Timm), Bill Rowston detailed the Public Participation Process under NEMA, including the way forward for the remainder of the project (see minutes of meeting p 284 to 291). Mr Moll only registered as an I&AP after this meeting (no previous communication was received from him) and Jadon Schmidt was in regular telephone contact with Mr Moll between the date of the meeting and the completion of the Final EIR, during which time he emailed the Draft EIR, suite of specialist studies and EMPr (emailed on the 5 th June 2012) as well as the final EIR which was emailed to Mr Moll on the 27 th July 2012. Mr Moll was afforded the opportunity to review and comment on the Draft EIR, specialist studies, EMPr and Final EIR, this response addressing a comment made in his written submission to DEA on the Final EIR (received by DEA on the 6 th September 2012).
	Page 258: Appendix D11: It would have been appropriate to have provided this Departments' Regional Office in Port Elizabeth with the original documentation and not only the office in Grahamstown.		Comment noted. This will be done with future correspondence.
EMP			
	Comments are included in the letter this Department sent to CES responding to a request to comment on the Draft EMP and Specialist Reports (copy attached).		Comments and issues raised have been addressed in a separate response table, dealing specifically with these comments.

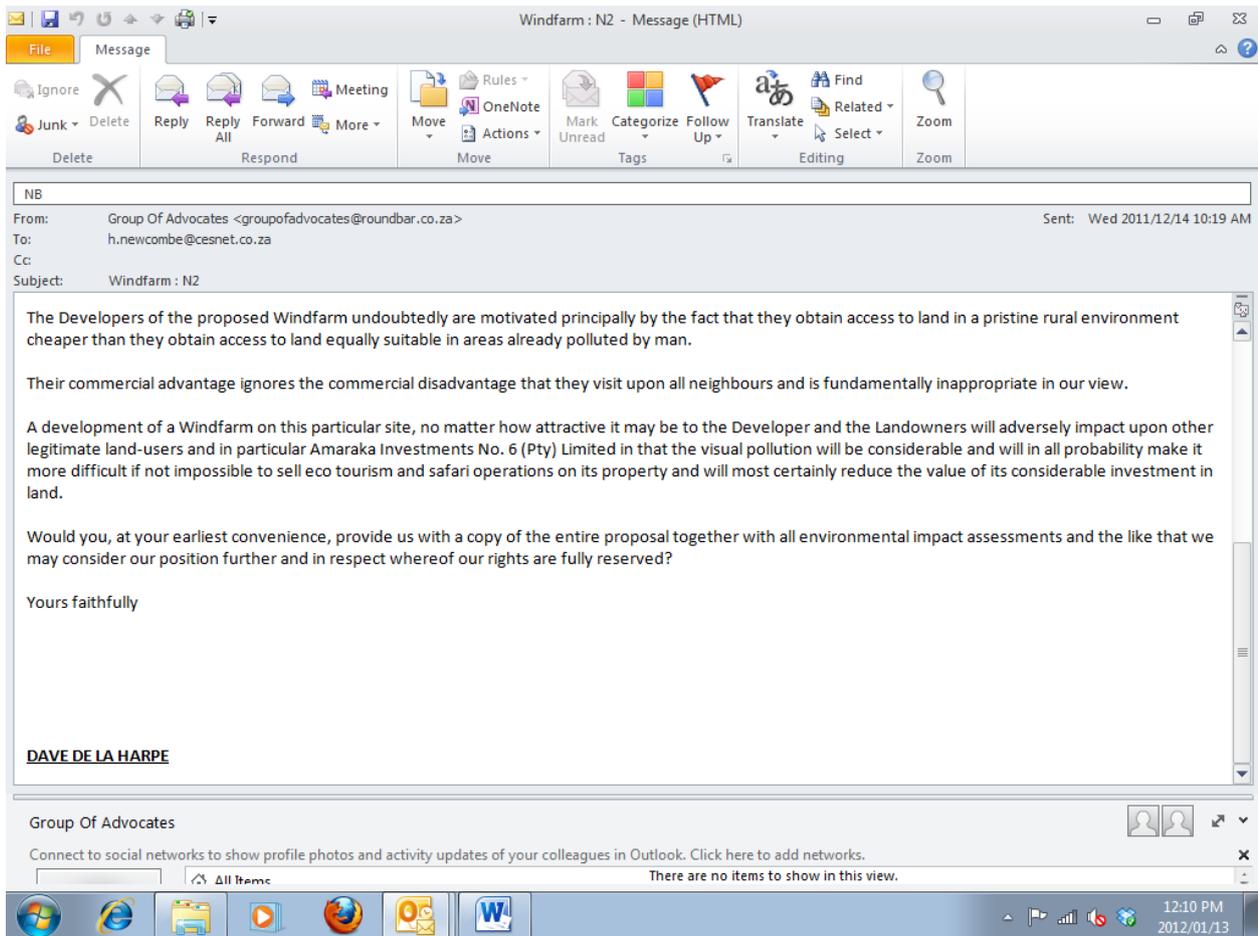
APPENDIX D-13: COMMENTS REPORT IN RESPONSE TO QUERIES RECEIVED FROM DEDEAT IN RESPONSE TO SPECIALIST REPORTS AND EMPr SUBMITTED 4th MAY 2012

NAME	ISSUE	DATE	RESPONSE
Ecological Specialist Report			
Alan Southwood	Page 9: First Paragraph: “between 2 and ? MW”.	31.05.2012	Noted & corrected.
	Page 14 onwards: Plant names: a number of genus and species are not separated by a space		Noted & corrected
	Page 20: Lubke et al 1988 is not in the reference list.		Noted & corrected
	Page 23: Are there any Threatened or Protected plant species promulgated in terms of the NEMBA growing on site? Permits are required to remove them.		Noted & addressed.
	Pages 25 to 27: The comment for Page 23 also applies to animals.		Noted.
	Page 25 and 26. Is it Branch 1988 or 1998? Refer to References on Page 47.		Branch 1998.
	Page 26: Is there a reference for Table 4-4?		Branch, 1998
	Page 26: Although there is a specialist study on bats, there should be some mention of them under Mammals as they have specific significance in the case of wind farms.		Noted & addressed.
	Page 27: Was the Provincial Conservation Ordinance consulted when Table 4-6 was compiled?		
	Page 34: Figure 4-2: Names of the Protected Areas would be informative.		Noted & addressed.
	Page 35: At the scale of this map some turbines are on the boundary between High and Medium Sensitivity, and between Medium and Low Sensitivity. During micro-siting can they not be moved to the areas of the lowest sensitivity?		No turbines will be located in highly sensitive areas. Micro-siting will be used to select the least sensitive areas.
	Page 40: “Some SSC will not transplant”. What is the feasibility of collecting seeds or taking cuttings if they must be destroyed?		
	Page 44: The Department agrees with the content of Section 7.		Noted.
	Page 46: Refer to comment on Page 23.		Noted & addressed.
	Page 46: DEDEA is now DEDEAT: Department of Economic Affairs and Tourism		Noted and addressed.
Page 46: Section 78.3: ‘last paragraph: See comment on Page 40.	Noted.		
Pages 47 to 48: Was data from the S A Frog Atlas, S A Butterfly Atlas, SABAP1 SABAP2 and other such initiatives consulted?	SABAP 1		
Page48: The reference Victor and Dold is incomplete.	Noted and addressed.		
Avifaunal Impact Assessment			

NAME	ISSUE	DATE	RESPONSE
Alan Southwood	Figures 1, 2 and 9: Add the following: North Arrow; N2; boundary of study area.	31.05.2012	Noted and addressed.
	Appendix 2: Where were the Bird Numbers sourced?		Southern African Bird Atlas Project (1997).
	Appendix 3: The Table needs headings.		Noted and addressed.
Specialist Bat Sensitivity Analysis			
Alan Southwood	Page 5: 2 to MW?	31.05.2012	Noted and corrected.
	Page 9 and Page 10 (Figure 3-2): What is the reference for the vegetation units?		Mucina L & Rutherford MC, 2006, <i>The Vegetation of South Africa, Lesotho and Swaziland- Strelitzia 19</i> , South African National Biodiversity Institute, Pretoria.
	Page 15: Figure 4-2: The colour for Tadaria and Miniopterus is very similar so it is difficult to see the localities on the map.		Noted and addressed.
Visual Impacts			
Alan Southwood	Page 33: 6.1.4.3: The tall trees are alien invasive trees (refer to Figure 6-4 on Page 37). There is most probably a legal requirement to remove them (CARA).	31.05.2012	Noted. The relevant landowner will be informed.
Agricultural Resources			
Alan Southwood	Page 6: Map 3: Indicate the boundary of the study site.	31.05.2012	Noted and addressed.
	Page 7: Map 4: From what reference was the map taken?		Mucina L & Rutherford MC, 2006, <i>The Vegetation of South Africa, Lesotho and Swaziland- Strelitzia 19</i> , South African National Biodiversity Institute, Pretoria.
	Page 11: $(11.79/2\ 500)*100 = 0.476\%$?		Correction noted. $(11.79/2\ 500)*100 = 0.4716\%$
General comment			
Alan Southwood	The recommendations made by most of the Specialists that fairly small changes in locality of some of the wind turbines will reduce their impact on a number of environmental parameters should be seriously considered.	31.05.2012	Noted and addressed.
	Mitigation measures recommended by all the Specialists must be incorporated into the EIR and the EMP as is stipulated on Page 33 of the EMP.		Noted and addressed.
EMP			
Alan Southwood	Use of verbs: we suggest consistency in the use of “shall”, “must”, “will”, “should”, “are to be”, “can be” and so on, as they all have slightly different meaning.	31.05.2012	Noted and addressed.
	Page 6: The paragraph “Current wind turbines “is duplicated.		Noted and corrected.

NAME	ISSUE	DATE	RESPONSE
	Page 15: Will the public be informed of the availability of the Policy?		Yes
	Page 16: Specify the Provincial legislation as it requires development will impact on Protected Plants.		Noted and addressed.
	Page 16: Specify from whom Protected Plant Permits namely DAFF and DEDEAT.		Noted and addressed
	Page 21: We suggest that a representative from this Department serve on the Liaison Committee to monitor compliance of the Authorization and EMPr.		Suggestion noted.
	Page 37: Provide more detail about buffer zones as recommended in Specialist Reports.		Addressed in Revised Final EIR.
	Page 37: Power must be transmitted from turbines to the substation via underground cables. The only overhead line should be the high-voltage Eskom line that takes the power to the national grid.		2 alternatives for connection to existing overhead 132 KV are proposed. Both entail overhead 132 KV lines from a substation. Please see p 19 & 20 of the Revised Final EIR.
	Page 37: Intermittent lighting must be used unless it contravenes aviation regulations.		Comment noted and addressed.
	Page 37: A higher cut-in speed for the turbines, as recommended in the Specialist Report, should be seriously considered to reduce the potential impact on bats.		Comment noted and addressed.
	Page 38: There is no yellow highlighted protocol.		Comment noted and addressed
	Page 39: Please quote any references used.		Comment noted and addressed
	Page 39: The Section “However, it must be confidence.” seems out of context (“cut and paste”)?		Comment noted and addressed
	Page 39: If bird records are submitted to SABAP2 they can be analyzed as part of a formal protocol.		Comment noted.
	Page 42: The Section “In addition to specialist.” seems out of context (“cut and paste”)?		Comment noted and addressed
	Page 42: Monkeys / Baboons (or any other scavengers) must not be able to open drums even if they are knocked / blown over.		Comment noted and addressed.
	Page 52: No construction on Public Holidays.		Comment noted
	Page 52: Alien vegetation should not be burned (legal requirements; danger of runaway fires).		Comment noted and addressed in EMP.
	Page 53: Turbine foundation should be located in flat areas (5°).		Comment noted and addressed.
	Pgg. 5.5 What are the Civil Aviation regulations regarding the lighting of turbines?		Lights on the nacelle need to be illuminated at night.





O. Crous
Honeykop Farm
Grahamstown
6140
Fax 046 6228474
cell 0826609974
12/12/2011

Hylton Newcombe
CES
67 African Street, Grahamstown
6140

Concerns Re: Plan 8 Wind Energy Project Ref 12/12/20/2523

As a neighbouring landowner (farm no. 361 and 362) of the above wind energy project, I wish to make my concerns known and taken note of.

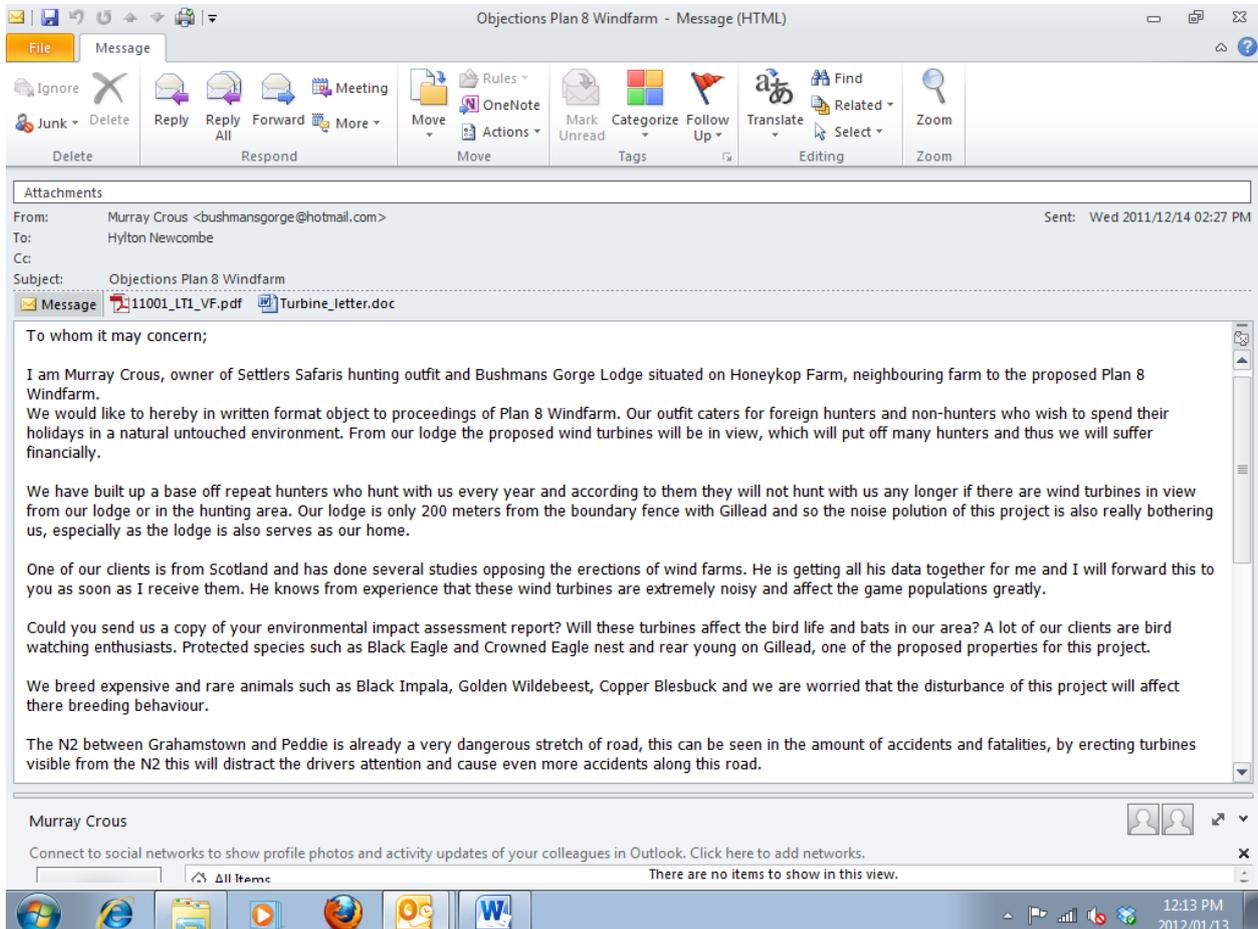
1. Any lights on structures to shine up into the sky and not sideways or downwards
2. Painting of structures to blend in with sky and surrounding countryside, not plain white colour.
3. I want to know what the noise level would be if the wind blows in the direction of my homestead.
4. What is the distance from the nearest turbine to my homestead or boundary and how many would be seen from the homestead?
5. The project must not negatively affect television, cell phone, Telkom landline or internet reception.
6. Has any research been done on the long-term breeding patterns of wild game within a distance of one kilometre of a forest of wind turbines? We are breeders of rare and expensive species of game.
7. Has any studies been done on the affect or disruption of birds in particular protected birds of prey such as black eagles, crown eagles and martial eagles which breed around and on the properties effected by the project.
8. I feel strongly that it should not be just the landowners on whose property the turbines are going to be erected to gain financially from the project, but the surrounding landowners who have got to suffer the effects of the wind turbines. Spoiling landscape, noise, lights, loss of business from hunting lodge, decreased property value etc.

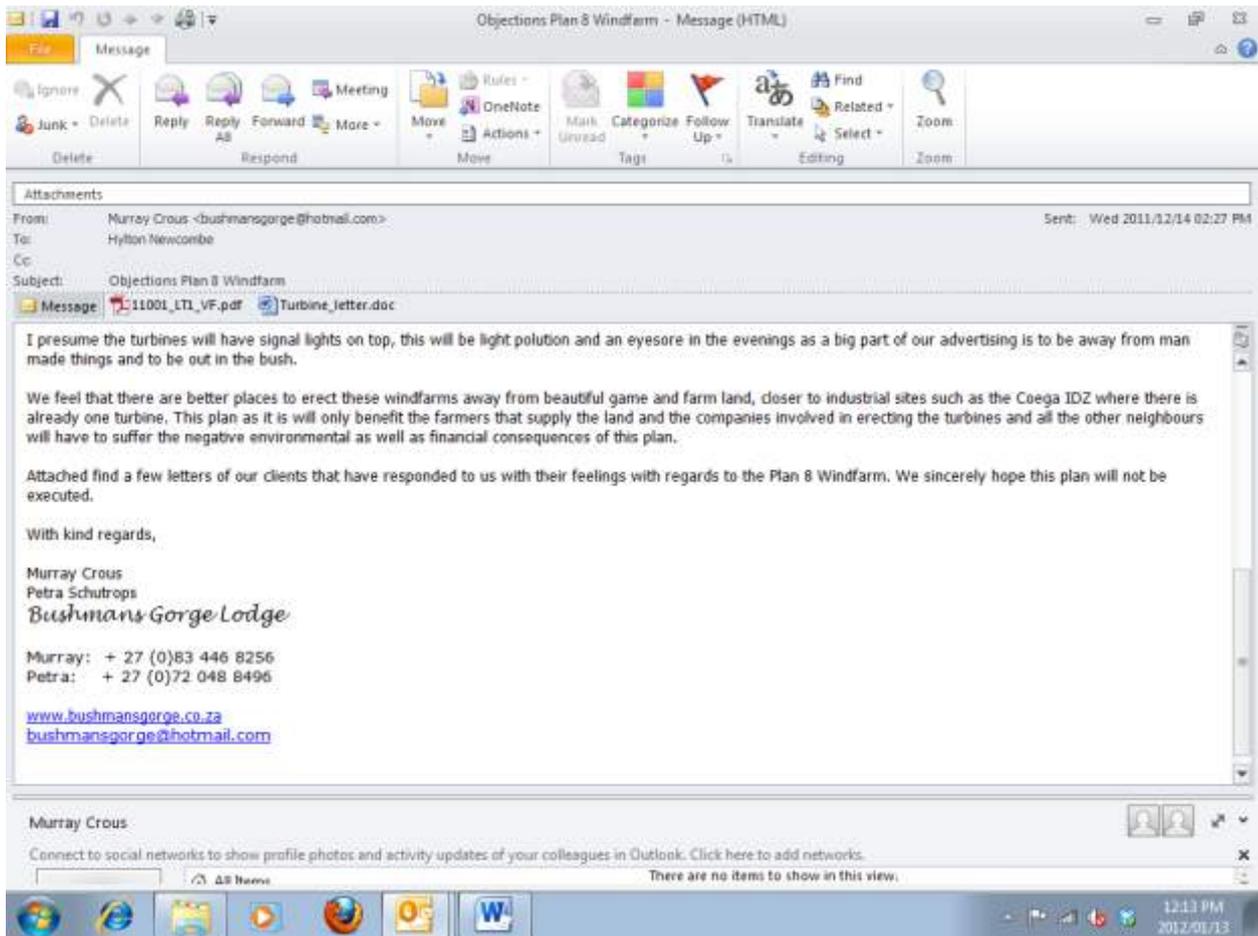
9. Regarding the 2% benefit to the community, I feel it should be benefiting the surrounding community who are affected by the project and not some distant urban community who are not affected by the project.
10. Regarding above point 8, I want to see the Coombs Agricultural Association being involved. This association being for the benefit of the farmers in this area as well as the farm workers and their families.

I wish to be kept informed of meetings and discussions where my concerns would be addressed and discussed.

Yours Faithfully

.....
O.Crous







SETTLERS
SAFARIS

Ultimate African Hunting

MURRAY CROUS

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Grahamstown, 10th of June 2012

ATTN: The Project Manager
CES
Grahamstown

RE: Objections to Plan 8 Wind farm Coombs

Dear Sir,

Hereby I wish to put forward my concerns and objections against your proposed wind farm. I reside and conduct my business Settlers Safaris from the farm Honeykop directly adjacent to the proposed site with the closest proposed turbine at 532 meters. Our lodge called "Bushmans Gorge Lodge" where we accommodate groups of up to 12 people, mainly foreign hunters, but also local hunters as well as tourists visiting Grahamstown, is situated on Honeykop farm. Besides the hunting I breed expensive species of game on Honeykop farm, such as Black Impala, Copper Blesbuck, Golden Wildebeest just to name a few.

My main concern is the loss of income I am expecting to incur. I have consulted with my return clients and their comments have been handed in to your company. They are all negative with regards to your project and since a lot of them come from countries where wind farms are common I value their comments. None of them show interest in travelling great distances to come and stay within sight of wind turbines let alone hunt in their shadows. One of them Mr. Arthur Newton has experienced personal loss by the erection of a wind farm directly next to his property in Scotland. Their comments in combination with a study I found, A PROBLEM WITH WIND POWER by Eric Rosenbloom 2006 which states that in surveys conducted by wind farm promoters, tourists indicate that 25 to 30% would no longer come if wind turbines would be installed, makes me very concerned for my livelihood as well as the livelihood of my workers. We have raised these concerns at your various information meetings and so far no literature has been provided that proves otherwise.

My second concern is the negative impact the project will have on property values. Even though no data is available locally, I find the outcome of a study conducted by a firm called Appraisal One with funding from the Calumet County Citizens for Responsible Energy (CCCCE) (Calumet County, Wisconsin) a good indicator. They found that land values decreased between 24 and 43% depending on the type of property. I personally as well as my neighbours have invested great amounts of money in our properties, to say that no studies have been performed locally and thus this impact cannot be proven I find naïve.

Bushmans Gorge Lodge, Honeykop Farm, P.O. Box 562, Grahamstown, 6140



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The visual impact of your project is enormous, a photomontage of the project shows that 14 of the 27 turbines will be visual from my lodge. I am highly concerned with regards to your visual impact assessment, I find it incomplete and biased. The photomontage is very limited to sites that are ranging between 6 and 12 km away which show minimal impact of the project. I find it strange that legal requirements towards the notification process dictate that only direct neighbours need to be notified, but when it comes to the visual impact assessment it is accepted to ignore the neighbouring farms which are most affected by this project.

The conclusion of the report states that the area is not pristine or scenic, I find very offensive and a personal opinion of the specialist, which should not be included in a scientific report. The paragraph that suggests that the traffic along the N2 will not have high visibility of the turbines due to tall alien trees, is nonsense, the traffic will have clear views of the turbines 10 kilometres each way from the turbines. Alien trees only cover a small section along the N2 about 10 kilometres away from the wind farm. The way it is describes in your report it is made to believe that most of the N2 is covered by alien trees.

A fourth concern is the noise factor, again I find your report very ill prepared. Not only is it only limited to 2 receptor points of which one is further away from the turbines than our lodge, it also shows that a night noise test was never completed due to rain. Seen the time frame that was available for completing this report, surely another day could have been scheduled in to do this important report. The fact that your turbine expert from Nordex is not willing to put in writing that I will not suffer negative noise impact from this project shows me that this is actually a possibility. We breed expensive game species and as we all know animals have more sensitive hearing than humans. I am concerned that the noise level and so called infra-sounds may have a negative effect on the breeding behaviour of my animals and thus on my income. Can you prove that this wind farm will have no negative effect on our animals?

I cannot understand why no alternative locations have been identified. In my opinion there are other more suitable locations that will have less impact on the environment like state land or industrial areas which also have good consistent wind speed, if not better. Our area is mostly a game farming and conservation orientated environment of which the Great Fishriver Bushveld is of great historical value.

Another concern is due to the wind farm, my income will be considerably reduced, thus I will have to retrench staff. If this wind farm goes ahead as you plan, local game farmers will have no option but to retrench a number of staff due to loss of income! This wind farm will cause almost no job creation for people in the immediate local area, especially for the long term.

Bushmans Gorge Lodge, Honeykop Farm, P.O. Box 562, Grahamstown, 6140



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This wind farm is causing major anti- social behaviour in our local community, people that have been friends for a long time and even family have turned on each other as only 3 farmers benefit from this project while all the surrounding farmers feel that the wind farm is detrimental to them.

- Please can you make sure that the noise test can be done from our lodge.
- I requested the minutes from our meeting at the Graham hotel, date 6th May 2012, could please make sure that I am emailed these minutes as soon as possible, as well as our latest meeting dated the 4th June 2012.
- Have you taken the airstrip on Stoneyvale farm into consideration?
- Can you guarantee that the wind turbines will not exceed above 7db above the ambient noise from our lodge?
- If it is not accepted that wind turbines be allowed in areas such as Kruger National Park, then this proves that there are negative effects on tourism from these turbines, so why should we accept them on our doorstep when we depend on tourism for our and our staff's livelihood? The hunting industry in South Africa generates around R 606 million rand per year and the Eastern Cape is number three in most visited province by foreign hunters, according to Professional Hunters Association South Africa.
- What is the carbon footprint from these 27 wind turbines going to be once erected, taking into consideration all aspects, i.e foundation, manufacturing mast etc?
- Has a geological study of the soil composition been done, as there are clay mines in the area and this might affect the foundations of the turbines?

Please could you address my questions and requests accordingly?

With kind regards

Murray Crous

Petra Crous

Bushmans Gorge Lodge, Honeykop Farm, P.O. Box 362, Grahamstown, 6140



Karball Trading 99 CC t/a
The Hills Game Estate
P.O. Box 362
Grahamstown, 6140
Phone/Fax: 046 622 8474
VAT number 401 024 0523

Grahamstown, 10th of June 2012

The Project Manager
CES
Grahamstown

Proposed Plan 8 Wind farm – Frasers Camp

As a game farmer, one of many in the immediate vicinity of the proposed wind farm and reliant on the custom of the mostly foreign hunters and tourists, we are vehemently opposed to the project.

It will not only affect our business negatively, but the future land value of the property negatively. This area is mostly game farming orientated, of great historical background around the Great Fish River and must not be intruded upon by landscape changing turbines.

In our opinion there are other more suitable areas for the erection of these visual impacting structures such as on state land, where they will have less impact than on mostly conservation orientated environment.

Yours faithfully,

K. Rawstron
N.Rudy
O.Crous

Owners of The Hills Game Estate, Farm number 206

To: j.schmidt@cesnet.co.za

From: Mr Fred Pittaway
BOX 2225

Grahamstown 6140..... Phone 0466223663

Date: Tuesday, 22 May 2012

Subject: **PROPOSED PLAN 8 GRAHAMSTOWN WIND ENERGY PROJECT,
GRAHAMSTOWN AREA, MAKANA MUNICIPALITY, EASTERN
CAPE PROVINCE OF SOUTH AFRICA.**

Dear Sir,

With reference to an email I read yesterday, 20 May 2012, which was submitted by Mr Dave Young, I would like to introduce myself and respond.

I am Fred Pittaway, a cattle and game farmer and neighbour to the above wind project. I am, owner of the farms Kalkvlei and Valleyview on which I have been farming cattle and game for more than 50 years.

I am astounded that the above project has received so much opposition. The generation of electricity by means of harnessing the wind is one of the older alternative means of generating power and I am convinced that renewable energy is the answer to our dependence on fossil fuel energy.

Wind power not only has the advantage of being a clean energy source but another added bonus is that the energy source is free and inexhaustible!

In addition to all the benefits of wind power I personally do not find the visual aspect of the turbines to be unsightly. They will enhance our skyline, reminding all that we are tapping into a clean and non polluting power source. Showing foreigners that we care about the environment. I am amazed that many of the people claiming to want to “protect” our environment are actually opposed to wind power, specifically if the wind turbines are in their view and in their “space” yet, no environmental pollution is created through the generation of electricity this way.

Surely Eco-Tourists will appreciate the sight of wind generators knowing that they are providing for a cleaner and less polluted environment.

It begs the question as to what the real reason for the opposition is ? Surely the benefits of “green energy”, job creation and benefit to the surrounding community cannot be overlooked simply because it might slightly affect someones personal income potential?

It is unfortunately the natural response of humans to envy that which is beneficial to others but does not seem to advantage them.

I personally feel the area on which your proposed Wind Energy Project is planned for is ideally suited for the purpose. My reason for this statement is that the natural veldt is very stony and grazing is generally of poor nature, so the economic viability of the area will be enhanced and it is perfectly situated from a wind perspective. I am dead against the building of Nuclear Power Stations with the potential disastrous and deadly health implications for people and animals in their vicinity and coal fired power stations that belch out their filthy

gases and smoke into the atmosphere. I cannot understand why the South African Government is not accepting more Wind Projects and making provision for more Wind and solar Energy Power to the national grid.

In my experience of game, they will only be concerned for a very short time and only those on the property that the turbines are actually on. Even they will get used to them and not be affected in the least. I am sure that even erecting a normal windmill will initially have the same effect. One can just look at how animals adjust being close to a road or national highway, after a while it does not bother them in the least. In fact I am sure that hunting and culling using helicopters create more stress in animals than any wind turbine could ever do.

It is also my opinion that it will not have any negative affect on the price of adjacent properties. My own being immediately adjacent to Houkoers.

To close I would like to state that I completely support the proposed scheme as it is currently envisaged and I have no doubt in my mind that should this proposal become a reality that not only will it be beneficial to those directly involved in the project but also better utilise the area and create an upliftment in the area due to the financial input.

It will create more job opportunities, especially on the manufacturing side, provide cleaner, sustainable and most needed electricity to the benefit of all South Africans .

There arises a new business opportunity for Mr.Dave Young to modify, produce, and sell blinkers such as those used on horses and donkeys to his esteemed foreign clients so that they may protect their hypersensitive eyes from the horrific sight of the wind turbines while enabling them to concentrate better on their telescopic sights.

Yours Sincerely,

Fred Pittaway.

WITHOUT PREJUDICE

Monday, 21 May 2012

Mr Jadon Schmidt,

Coastal and Environmental Services,

PO Box 934,

Grahamstown.

6140.

PER E MAIL: j.schmidt@cesnet.co.za

Dear Sir

PROPOSED PLAN 8 GRAHAMSTOWN WIND ENERGY PROJECT, GRAHAMSTOWN AREA, MAKANA MUNICIPALITY, EASTERN CAPE PROVINCE OF SOUTH AFRICA.

I am unsure as to whom I should address this letter of comment. For reasons stated later on I have not attended any meetings, registered as an interested party or interacted with any of your people. Could I please therefore request that you hand a copy to the relevant person concerned in order to ensure that my comments and objections are noted?

I address this letter to you, as a director and, on behalf of George Building Supplies (Pty) Ltd a company duly registered and incorporated within the Republic of South Africa. I am mandated via a resolution of the directors to act on behalf of George Building Supplies (Pty) Ltd who are the registered owners of Chertsey Game Farm which is registered as Portion 4 of the farm Chertsey in the Bathurst district, in extent 947 hectares.

The business of the farm includes, but is not limited to

1. The breeding of game for resale
2. Hunting
3. Letting and accommodation
4. Eco tourism

The farm is bordered on the South by the Kap River, on the North by the Coombs River, on the East by the farm Elephant Park and on the West by Mr Glyn Dixon. The farm is game fenced and we have various game species which include Kudu, Nyala, Zebra, Hartebeest, Impala, Eland, Blesbuck, Mountain Reed Buck, Blue Wildebeest and Black Wildebeest. Species that also occur naturally and in abundance include Bushbuck, Duiker, Blue Duiker, Warthog as well as a vast number of other species that are too varied to list. In addition we have a large population of birds which include most of the

Raptor species as well as a healthy population of Owls and Knysna Louries, all of which reside in our pristine forested areas.

On Thursday 17 May 2012 I received an e mail from Glyn Dixon giving me late notice of a meeting to be held at the Graham Hotel that evening at 6pm. The purpose of the meeting was to discuss a proposed wind tower plan. Unfortunately I could not attend as I had a prior meeting of the Port Alfred Benevolent Society. Later that evening I got an opportunity to open the e mail and have a look at what is contained within the proposal and the draft EIA that was enclosed. This is the first time that I and my fellow shareholders and directors became aware of the scheme which is now in an advanced stage of planning.

At the outset I wish to vehemently place on record my objection to the fact that we have been informed of this project in this manner, and at such a late stage. Whilst it would appear from the report that your firm went to a reasonable degree of trouble to inform and involve most of the stakeholders we somehow were never informed. I reside in Port Alfred and I read The Talk of The Town. Not one of the parties involved, including your company, questioned why we, with a substantial investment in the game farming industry, were not concerned with a scheme of this nature and magnitude on our doorstep, and furthermore why we never attended any meetings.

I have conducted some enquiries and it would appear that some other major role players who are directly involved as stakeholders in the Game Farming Industry are also not aware of the danger that this scheme presents to us. I am thus now attempting to ensure that this proposal is fully understood by all parties concerned. As an example Elephant Park has expressed surprise when I informed them of the magnitude of this proposal. The foreign owner of this large reserve (at the date of this letter) is still not aware of this scheme as well as the significant impact that this proposal will have on his investments.

Like me I suspect that it will come to him as a horrible surprise.

The draft report that I have received is, as I understand it, now open for public comment until 6 June 2012. Kindly correct me if this is not the case. The report is lengthy and has been comprehensively prepared. It is indeed difficult, as a layman, to be able to fully absorb all that has been said but herewith my comments and observations.

VISUAL IMPACT ASSESSMENT

I am not satisfied that this report deals with this item honestly and in an unbiased manner. My assertion is based on the wholly inadequate photomontage that accompanies this report. Not a single photo comparison was taken at Chertsey Game Farm, and others, where the impact will be significant. Most of the photos taken and included were from far away distances in order to show minimal impact (6.726km, 5.686km and 11.819km) and I find this disturbing.

From your report I have no idea as to the actual visual impact on Chertsey Game Farm as I have not been consulted and no photos were presented or included for comment.

My understanding however is that we will be significantly affected, as will other parties, and this is not fully or properly addressed in the report.

The significance of the adverse affects of these wind turbines from a visual impact and intrusion point of view are as follows:

1. The current and future value of the surrounding farms will be significantly reduced as a consequence of having to look at these huge turbines. If anyone has any doubt as to the size of these behemoths then drive to Port Elizabeth and have a look at how just one of these monsters dominates the surrounding area. Who wants to buy or own a property looking onto this proposed scheme vs. the current bush covered rolling hills.
2. Those operations dependant on hunting as a source of income will be negatively affected. Hunters, especially foreigners whom many of the farmers depend on for an income, will certainly not choose an African bush experience staring at a landscape dominated by large spinning turbines. These clients will go elsewhere.
3. Eco tourists would far prefer to look at scenic hills rather than spinning turbines and they will also take their business elsewhere.

At night instead of looking at the stars we will all be presented with a plethora of the statutory blinking red lights covering the hills and horizons. During the daytime they will be highly intrusive due to their size and Civil Aviation rules stating that they must be brightly painted.

The myth of believing that the scheme will in all perpetuity be limited to the proposed number of turbines is naive and a pipe dream. Once the infrastructure is allowed to take hold you can be assured that more will follow and once this phase is off the ground it will be difficult to stop or object to future phases.

Furthermore it is difficult for me to comprehend how we can rely on data from England and Wales in order to determine how the values of our properties are to be affected by the siting of these wind turbines. One can appreciate that the concept of wind farms is new to Southern Africa and few if any studies are available. I would suggest that instead of relying on vague data that a comprehensive study is undertaken as millions are at stake and people's livelihoods can be affected.

LOW SENSITIVE AREA

I naturally strongly disagree with the view expressed and your generalisation that the landscape character is not pristine and low sensitive to a development of this nature. With respect this is less than the truth and should you care I will take be happy to take you on a tour in order to show you pristine forested areas.

NOISE

I am not satisfied that any studies have been undertaken as regards the noise that these turbines emit and the specific effect that that this noise has on the naturally occurring game species on Chertsey as well as the other farms in the area.

Furthermore I have no indication as to what effect this noise will have on my introduced herds of Kudu, Eland, Nyala and Wildebeest, and whether this will affect the areas that they inhabit as well as their breeding and feeding patterns.

You are well aware that these animals have hearing capabilities far greater than humans.

I also have no indication as to what noise levels we and our guests will be exposed to on the various areas of our farm as we have not been consulted or given any information whatsoever.

BIRDS

For information purposes I would be interested to hear what effects, if any, that these turbines will have on the night owls, Bustards, fledgling raptors and slow flying Knysna Louries that are common in the forested areas which occur in the immediate vicinity of some of the proposed turbines.

CONCLUSIONS AND RECOMENDATIONS

Your report acknowledges that a high number of game farms occur within the study area. You also conclude that they will be subjected to very high levels of visual intrusion from this development.

You further conclude that the area is not scenic or pristine. My simple question to you is that if this beautiful area of ours is so unattractive then why have so many game farms been established and why have so many people invested huge sums of money in this area? To label the Kap, Coombs and Fish River areas as not being scenic and furthermore as low sensitive areas is in my opinion biased in favour of the developers, subjective and irresponsible.

In order to substantiate your conclusion the report then introduces the subject of wind energy being clean and sustainable. This is not in question and is accepted by all. Clean and sustainable power is however irrelevant in terms of the argument as to whether this is the best site.

In my view the glaring contradictions contained within the reports conclusions and recommendations render the argument in favour of these turbines fatally flawed.

The report is silent on the future extension of such a scheme and the suitability of neighbouring terrain. This to me is more of a threat than the current proposal, as once established it will be hard to stop more from being erected. There is no indication that by accepting this proposal that it will be the end. Conversely my view is that we will open the floodgates.

There are indeed far better places to site wind farms other than in the middle of a scenic area with an established game farm, tourism and hunting industry. Those properties that will be subjected to the proposed and future visual intrusion represent a material amount of capital and employ a large number of people. What this scheme proposes is to severely impact on the visual beauty of this area and negatively affect its existing potential as well as the viability of many of its stakeholders.

In conclusion I am left in no doubt that should this proposal, in its current form, become reality and I am forced to look at the proposed turbines, then the value of my property and lifestyle will be compromised. This in itself is unacceptable to me. Together with others, we are not prepared to accept that our rights be compromised by this scheme which will only benefit a few individuals. I am sure they are well meaning and only acting in their own best interests, but unfortunately this is to the detriment of other stakeholders with severe financial implications.

George Building Supplies (Pty) Ltd hereby gives notice that we reject the scheme, as it is currently envisaged, in its entirety. In this regard we reserve all of our rights under law.

Yours faithfully

DC Young

Director

E Mail davey@datimbers.co.za

Tel 082 7791372

G.B.Dixon
Coombsvale
7/5/2012

CES
Grahamstown

Dear Anton

I have read through the specialist reports as well as EMPr Draft. A few issues came out of them for me.

The first issue is the finding of the old ox drawn plough on Gilead which was photographed and the specialist suggested placing it in area to be fenced off around two graves I showed him. That plough belongs to me and I put it there having come from my other farm. I was using it as a lever to open and close my neck clamp I made at the end of my cattle race! It is not something that has been there for hundreds of years and left there by our ancestors!

Secondly; the girl; was it Lee-Anne who did the study on vegetation; took pictures and I recognize a few of them on my farm and she speaks of over grazing and how that has affected the vegetation of the area. From my farm Gilead's perspective in the last 33 years or so I have been farming it post my father, overgrazing has not occurred. The recommended stocking rate to my knowledge is 1LSU to 7 ha and not 6 as was stated there.....never the less I have been running about 1 LSU to 10ha which does not make cattle farming too profitable here, hence the need to make these farms more profitable by wind farming and making them more viable economically.

In the Visual Specialists report, I see the Kapp River Reserve as being in close proximity to project and marked in red from a visual perspective. I would like to point out that NOTHING ever happens here. It does not even have game guards staying there let alone visitors or sightseers, because there is just virgin bush here and fynbos and scrub on the top of the Coombs ridge.

In my opinion there should be more effort throughout South Africa to have as many as possible of these renewable energy projects and less obstacles thrown before them. Coal driven electricity plants must be killing thousands of people indirectly everyday from all that soot and smoke and ruining the atmosphere and ozone layer. To me regardless of whether or not I benefit from this project, I find these turbines attractive and serene, utilizing GREEN, renewable energy.

Kind Regards.

Gavin Dixon

Moll Property Trust

ET 689/96

RESIDENTIAL ADDRESS:

Trumpeters Drift Farm 612
Albany District
GRAHAMSTOWN
RSA

TEL: +27 (46)6225731
CELL: +27 0828041669
FAX: +27 (46)6368901
E-mail: azaclm@intekom.co.za

POSTAL ADDRESS:

P O Box 6105
Market Square
GRAHAMSTOWN
6141
RSA

Coastal & Environmental Services
P O Box 934
Grahamstown
6140

10th June 2012

For Attention: Mr. Jadon Schmidt

Dear Mr. Schmidt

Re: PLAN 8 / GRAHAMSTOWN WIND ENERGY PROJECT

I refer to our meeting held on Monday 4th June 2012 held at your premises at 11:00am as well as to your email dated 5th June 2012 at 03:53pm.

As brought to your attention, I have been completely unaware of the PROPOSED INFINITE PLAN 8 GRAHAMSTOWN WIND FARM.

Those of us who attended the meeting were informed that you had complied with your legal requirements when publishing the matter in the Grocott and EP Herald, the placement of your notice boards and informing the immediate neighbors to the proposed site.

At the outset I'd like to point out, that we as farmers do not have access to the newspapers you refer to on a daily basis and hence the chances are slim that we would have seen such a notice. No notice board was erected at the junction of the N2 and the Committees Drift Road or the Fort Beaufort and Committees Drift Road, which constitutes the only road running through the Fish River Valley from the N2 in the East to the Fort Beaufort Road in the South West and which happens to be the road along which all the large game farms in this valley are situated. To my knowledge none of the farmers in this region belong to the Coombs Farmers Association and would not have been aware of any discussions held at this forum. It was by a pure chance meeting in town, with Mr. Murray Crouse that this matter was brought to my attention.

Since receiving your email, setting the deadline for our input as being Monday 11th June 2012, which constitutes only 3 working days, it has been a mad rush to download all your documentation, try to read and assimilate the contents thereof and to contact the various farmers in the Fish River Valley to discuss the matter. As of today I have managed to contact 16 land owners, which comprises of 33 farms and together with those owners who have already registered as affected and interested parties with yourselves, comprise in excess of 90% of the total land ownership between the N2, Committees Drift turn off and the Fort Brown, Echo Pass Fort Beaufort Road junctions as well as the affected area in the Coombs Valley. The only people who do not want to be represented are those who will benefit financially from the wind turbines on their farms and a few of their immediate family members. There are four farms which have been recently purchased by the government and I do not know who to contact with respect to these farms.

I would like to state for the record that not a solitary farmer or game rancher in the Fish River Valley was aware of the proposed wind farm. We are of the opinion that for a project with such far reaching implications to so many of us, you should have gone beyond the mere legislative requirements that you followed.

Each and every one of them has asked me to reflect in this letter that they wish to be recorded as affected parties and their concerns are primarily those that will be set out below but are not limited thereto. These affected parties who wish to be noted as affected parties will be set out on an attached schedule "A".

Please note that we are still endeavoring to contact foreign land owners for their comment.

It is also an impossible task in such a short period for any of us as lay-men to read and understand the full meaning/impact of the opinions reflected in your study. The affected parties have therefore decided to obtain the services of an Environmental Specialist to study your findings in more detail to assist us to what we believe will result in the eventual legal actions.

A number of concerns which you asked me to document and which we believe will have a devastating impact on us are listed below and not necessary in order of severity and will obviously not include additional factors as established by the affected persons appointed specialist.

PROPERTY DEVALUATION

We as game farmers/tourism operators have invested hundreds of millions of Rand's into the Fish River Valley and the Coombs Valley. Our properties in many instances are our greatest assets and we have spent years building up our properties and our business operations which we conduct from these premises. The hunting, photographic and tourism industry as well as the breeding and relocation of game is one of the largest income producers in the poorest province of the our country and the Fish River Valley and the Coombs Valley, contribute significantly to Provincial and Government coffers.

There is no way that anybody who can afford to buy established game farms and/or stock farms today will do so where twenty seven 150 meter high structures are clearly visible from their properties. We believe that should we want to sell we will be unable to do so, resulting in catastrophic financial implications to the land owners who will be affected in one way or another by the proposed wind farm.

International clients do not even want to see an internal fence on the property, let alone Eskom lines, so the visual impact created by these monstrous turbines which will be visible from the coast in the East to the Croomy Mountains in the West and far North to the town of Peddie, will not result in the African experience which foreign clients demand.

I would like to point out that five of the 27 proposed turbines will be less than 500 meters from the South Eastern border of the largest game farm in the Fish River Valley, which has only recently brought in foreign direct investment of approximately Forty Million Rand into the area. We believe that the loss of value to this direct foreign investment will have serious consequences.

VISUAL IMPACT

This is a further extension to the above paragraph and we would once again stress that our investment into the Fish River Valley and the Coombs Valley was done because of the natural beauty and the indigenous valley bushveld which prevails through the area. We believe that these wind turbines (150 meters high each, equating to twenty seven 50 story buildings) will scar the landscape forever. There is no way that these monstrosities can in any way enhance the beauty of these valleys.

I do not believe that the numerous tourists' who visit the valley for one reason or another, including all the historical tours of the various battle fields and historical monuments, will be impressed by the visual effect of this wind farm project.

As you are aware the N2 National Road is being upgraded, with work having already reached the Fish River cuttings and aerial markers have already been placed along the N2 adjoining our farm and passing the proposed wind farm site. This is due to the increase traffic along this route and one only has to see the number of tourist busses passing along this route to understand that thousands of visitors and tourists will have to pass through this wonderful valley and will be able to see wind turbines from other side Peddie to the top of Green Hills, close to Grahamstown. This will most certainly detract from the natural beauty that these visitors and tourists experience whilst passing through this area at present.

I note from your specialist documentation, it is stated that the traffic on the N2 through the proposed area will be screened by high trees. This is nonsense as there are no high trees except for the few positioned immediately to the West of the main entrance of Mr. Nortje's property (proposed site). I doubt whether this expert has been to site. Further more from your report and your photographs the high impact visibility sites marked in red are only indicated around the proposed turbine sites on the proposed properties. The distances given by your specialists as to being able to view the wind milling turbines are completely inaccurate as those of the erected one at Coega can be seen to be wind milling far in excess of 10Km distance.

LOSS OF REVENUE

To those of us who constitute ownership of the largest part of the land in this area and who operate photographic / hunting / tourism businesses from our premises, believe that our revenue stream will severely be curtailed. Most of us have or endeavour to have a return client base of approximately 65% or greater. Our clients travel from all corners of the earth and expect an African experience whilst on our properties. Internal fences, escrow lines and the likes have a negative impact on their expectations and now the addition of the proposed wind farm will result in many first time visitors not returning and we believe a number of existing clients will do the same, finding an alternative African destination.

GAME RESERVES

The Double Drift Game Reserve, Andries Vosloo Kudu Reserve and the Sam Knott Reserve, which combined constitutes the second biggest Government Game Reserve area in the Eastern Cape will also be directly affected by the negative visual impact, being imparted to all the tourist and nature lovers who frequent these reserves. I am unaware whether the Provincial Nature

Conservation Department and Eastern Cape Parks Board are aware of the proposed wind farm and their response to this.

NOISE LEVEL

We note that from the noise impact assessment which we downloaded that a wind speed of 12m/sec was used to establish certain criteria; however what would the impact be, between 12m and 18m per second? Predominantly we have South Westerly prevailing wind and we believe that twenty seven 150 meter high turbines will generate a significant noise factor when flowing down the escarpment and into the Fish River Valley. It is fact that animals are extremely skittish in windy conditions.

We are concerned not only to the noise impact on humans, but on our game and we are unaware of what effect this will have on our breeding cycles and character on the game at large. Will they remain reasonably tame or will they become wild and skittish. Will they attempt to flee our properties and get killed or injured in the game fences or worse dsappear into neighboring farms from where we will be unable to retrieve them, this resulting in further financial losses. This must also be constituted as a safety hazard on the National and Secondary Roads situated around our properties.

For the record, the owners living at Coombs Vale are able to hear when traffic passes over the reflective markers on the N2 as well as music emanating from taxis passing this locality. You are now proposing to place wind turbines between the N2 and his property, this will have a huge impact on all those land owners living around the proposed site.

We however believe that the noise levels and the effects thereof have not been adequately researched in your findings as presented.

POLLUTION OF WATERWAYS

At present, Mr. Botha Van Niekerk's farm, Spekboomvel and my own farm in the Blue River Basin are affected by the clay mines on Mr. Nortje's farm where the proposed wind turbines will be placed. The "caolin" deposits are evident in all the steep valley waterways draining from the escarpment (proposed site) down through our properties to the Fish River. This clay seals the ground and as you are aware negates any growth where deposited.

We would like to know what effect the runoff from the new erection sites will be, specifically whether or not there will be an increase of "caolin" in our waterways.

The above are some of the concerns we as affected persons would like recorded on the environmental impact study. Further professional advice and findings will be forwarded to yourselves within the 30 day period following the 11th June 2012.

All the affected parties listed on the attached schedule have specifically asked that you record them as affected persons in this matter and that you keep them informed accordingly.

Please acknowledge receipt of this letter and we look forward to further discussions with you in due course.

Yours Faithfully



Mr. Pieter de Villiers Moll

SCHEDULE "A"

AFFECTED PARTIES

<u>OWNER</u>	<u>FARM NAME</u>	<u>FARM NO.</u>
1. Moll Property Trust	Buffels Drift	No. 210
2. Moll Property Trust	Koodoo Kop	No. 211
3. Moll Property Trust	Trumpeters Drift	No. 612
4. Moll Property Trust	Long Vale	No. 635
5. Richard Palmer	Bridgewater	Portion of 206
6. Richard Palmer	Ashtondale	No. 119
7. East Cape Game Properties (Pty) Ltd.	Munster	No. 614
8. East Cape Game Properties (Pty) Ltd.	Runford	Portion of 127
9. East Cape Game Properties (Pty) Ltd.	Ulster	No. 128
10. East Cape Game Properties (Pty) Ltd.	Lakeside	No. 203
11. Coetzee Investment Trust	Woodvale	No. 201
12. Coetzee Investment Trust	Glenn Dew	No. 202
13. Coetzee Investment Trust	Portsmouth	Portion of 203
14. P E Investment Trust	Southey's Hoek	No. 212
15. Botha Van Niekerk Trust	Spekboomvale	No. 216
16. Albatros Investment Trust	Sutherland	Com 4
17. B K Webber	Connaught	No. 125
18. B K Webber	Athlone	No. 119-2
19. B K Webber	Leinster	Unknown
20. Connaught Farming Trust	Portion of Glenboyd	Portion of 204
21. Munster Trust	Glenmelville	No. 197
22. Munster Trust	Glendew	No. 200
23. Munster Trust	Glenelg	No. 199
24. Munster Trust	Cotswold	No. 202
25. Munster Trust	Portion of Boskydell	No. 195
26. Munster Trust	Portion of Southerland	No. 221
27. M Coetzee	Blydemoed (Coombs)	Title Deed No. 20633/1984
28. M Coetzee	Percival (Coombs)	Title Deed No. 0205/1984
29. Percival Farm Trust	Percival (Coombs)	No. C7
30. M D Coetzee	Coombs Vale (Coombs)	To be advised
31. New Heights cc	Bakers Farm	No. 1486
32. A Smailes	Glendowan	No. 205
33. K Bates	Drivebush (Coombs)	To be advised

WITHOUT PREJUDICE

4 June 2012

Att: Jayden Schmidt

Coastal Environmental Services

P O Box 934

Grahamstown

6140

Objection to:

Proposed Plan 8 Grahamstown wind farm project, in the Grahamstown area, Makana Municipality, Eastern Cape, South Africa.

Objector:

Edcot Trust t/a Huntshoek Safaris & Huntshoek Lodge cc

Nature of business:

- 1) The breeding of game for resale
- 2) Exclusive trophy hunting
- 3) Luxury accommodation

The farm Huntshoek was acquired in August 2005 for the purpose of game farming, hunting and tourism.

The farm has an abundance of, kudu, nyala, impala, duiker, bushbuck, zebra, wildebeest and warthog to name but a few.

Huntshoek is also home to elusive aardvark, batear foxes and a healthy population of tortoise and home to several breeding pairs of the magnificent Fish Eagle.

Huntshoek vegetation is commonly referred to in this area as “fishriver valley bush” type vegetation, which includes euphorbia, spekboom and many other delicate flora, which lends a special splendour to this area.

This area also extremely rich in history, folk lore and African culture; is a popular destination to avid nature lovers, historians and overseas tourists that come and enjoy this rugged, diverse and beautiful area and enjoy all things African.

Investment:

Since August 2005 we have invested millions of rand in upgrading facilities and infrastructure on the farm and therefore contributed greatly to the land value in this area.

Our investment is large and our commitments great and we would want to continue to contribute positively to this area and its communities.

Huntshoek and other game farms, lodges, eco estates and the community all have a vested interest to make this area “the frontier country” a top tourist destination in our country and ensuring that this area remains the biggest contributor to the health, wealth and security of the communities affected.

Information neglect:

It was with absolute horror and surprise that we were informed of a meeting that was to be held in Grahamstown on the 17 May 2012 to discuss the proposed wind farm project, already in an advanced state of planning.

Totally floored, that we as one of the major contributors to this area’s wealth, was completely ignored in the onset stages of a project of this magnitude, we could not begin to understand why???

As a responsible landowner, we no doubt, see the bigger picture and understand the need for alternative energy as a way forward, and have; ourselves; invested in such projects elsewhere. So we are well aware of the benefits, drawbacks and processes involved in alternative energy projects.

But how do we support a project if it does not support us.

We fail to understand that a project of this magnitude is discussed with a few landowners who are in the minority and they are able to voice **their** opinions and make decisions on a project of this size, without so much as to consider the opinions of the **majority** landowners in the area.

How can a minority decide on the impact that such a project will have on game farms, hunting and tourism in this area, when they themselves are not even involved in such business. It gives the impression that deliberate steps were taken to keep this project quiet for the benefit of a mere few until a point of no return was reached.

Notifications that were placed in the Grocotts Mail and EP Herald newspapers failed to supply such important information to a large portion of landowners in the area. To take it for granted that everybody in this area reads the Grocotts Mail and EP Herald is unfortunate and we yet to see a notice board !!!

Negative Impact:

The area in its entirety is marketed as the “Frontier Country” an area rich in history and attracts many folk from all over the world to come and experience the true Eastern Cape flavour.

The impact on game farms and tourism most definitely would be a negative one, as we rely extensively on the pristine beauty and untouched landscapes to attract visitors to our area and should these wind turbines mar this picture, which it will, visitors to most of the game farms and lodges in this area will drastically decline as no one wants to sit and watch noisy wind turbines whilst they paid to come and experience nature.

Would a project of this nature guarantee NO decrease in the value of land, or can it guarantee the increase in value of land? We fear none of the above is possible. The negative impact on investment return is great, as future investors would not want to purchase land that overlooks an “industrial area” or a farm that would not be able to benefit from tourism and hunting. Tourist and hunters would be scared off by the visual impact these monsters will have on their “African safari” and most certainly start looking at alternatives.

Surrounding communities stand to also lose a good source of income through employment that is offered by game farms and lodges, should these enterprises cease to exist or scale down.

Huntshoek together with other game/tourism business concerns, in this area are not prepared to have our right to make a living compromised by

this project, while it would only benefit a few individuals with almost no vested interest in this community.

Conclusion:

As mentioned before the benefits and importance of alternative energy is great and should be pursued in an effort to extend the future of our precious planet.

But at no time should the pursuance of such projects enforce unreasonable / uninformed sacrifices.

Ask the question; why am I expected to sacrifice my livelihood to someone who did not even have the decency / respect to inform me that he/she/it was going to take it away????

It then leaves us with no alternative but to vehemently object to this project and request that we are immediately recorded as an affected party and have the recognition we so duly deserve.

We reject this project in its entirety, and in this regard we reserve all our rights under law.

A Timm

Huntshoek Lodge cc

Edcot Trust t/a Huntshoek Safaris

Dear Sir or Madam:

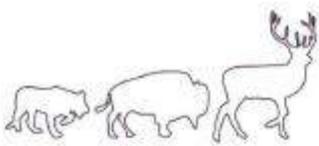
We are hunters from the United States that have repeatedly enjoyed the hospitality of Professional Hunter Murray Crous who runs Settler's Safari's and lodge manager Petra Schutrops at Honeykop farm at Bushman's Gorge Lodge. Our hunts have always proved successful due most certainly to their valiant efforts, professionalism and high ethical standards of operating such a business. We have recommended Murray and Petra to many of our friends and acquaintances and we plan to continue to hunt exclusively with them only in the future due to the high quality hunts they have always provided. However, we are quite concerned as we now understand that there is a possibility that turbines might be erected on or near this peaceful and tranquil hunting area. We believe that this will have a very profound and negative effect on what is now a very superbly managed hunting ranch. If this does happen, we will be forced to look to other area ranches to hunt on as it will obviously have a very negative effect on the animals and the hunting there. We have seen this happen here in the U.S. and sadly as it is to admit, the outcome was very negative to the natural environment as it changed so very drastically that several species of indigenous animals virtually became non-existent. We strongly suggest and highly recommend that you re-consider your thoughts on this decision as it will most definitely cause us to reconsider where we might hunt in the future. It would be shameful to see such a lovely place be wasted so. If you would like, we welcome you to contact us personally for further discussion.

Sincerely,

Jerry W. Ford
 955 Highway 10
 Hartsville, TN 37074 USA
 615-374-2337 615-374-2337

Kimberly Ford Wrinkle
 1015 Oglesby Road
 Hartsville, TN 37074 USA
 615-519-6917 615-519-6917

Jason Ford
 230 Sulphur College Road
 Hartsville, TN 37074 USA
 615-633-3385 615-633-3385



Preparace Pekař spol. s r. o.
Taxidermy
Průmyslová 1895/1, 568 02 Svitavy
Czech Republic
IČ: 275 52 365

Murray Crous
P. O. Box 362
Grahamstown
6140
South Africa

<u>Your letter</u>	<u>Our sign</u>	<u>Person</u>	<u>Svitavy, date</u>
	11001_LT1_VF	V. Fila	12. 12. 2011

Case: Consideration

Me Vladislav Fila and my clients where hunting with Murry Crous at "Honeykop lodge" and "Bushmans Gorge Lodge" the last years. We are in hunting business "Settlers Safaris".

We are planning to hunt there also in future, but when in the close area would be wind turbines we would not come! Me and my clients would like to visit virgin nature of Africa and no view with wind turbines.

| Bc. Vladislav Fila
 |
 | Preparace Pekař spol. s r. o.
 | Průmyslová 1895/1, 568 02 Svitavy
 | Průmyslová 1895/1, 568 02 Svitavy, Czech Republic
 | v.fila@seznam.cz
 | GSM: +420 739 633 688



Adrian Sailor
14 Lawnsfield Walk
Parkside
Stafford
ST16 1TS
UK

Dear Murray

I am saddened to hear of this potential wind turbine issue. After hunting with Settlers Safaris I know a problem like this will obviously cause an issue with your business at Bushmans Gorge. This will affect the animal numbers and quality and hence my clients may think twice about rebooking. This has consequences for your business and also mine.

I am certainly against this proposal. There are plenty of other locations these can be housed, certainly not anywhere near a game reserve such as yours.

Please let me know how things progress.

Yours faithfully

Adrian

Dear Murray and Petra at Settlers Safaris.

I have heard the news about the wind turbine plans nearby Honeykop...

I have allways enjoyed to hunt with you guys at Settlers Safaris at Buschmanns Gorge, Honeykop and have had the pleasure of doing it several times.. And the friends I have brought there has also had the best hunting time in SA ever.

But I'm sorry to tell you, that this project will make me and my friends consider finding an other place to hunt, because we know from Denmark that the animals don't like to live nearby turbines - and we don't wanna travel so far for hunting without result.

I'm sorry - I really do hope that this decision will be changed so we can go hunting again in 2012 at Buschmanns Gorge, Honeykop.

We will be planning next SA- hunt during the next couple of months, so please keep me informed

Best regards from

**Sussie Torné Roed
Karensvej 15
4440 Moerkoev
DENMARK**

Date: December 13, 2011
From: Charles A. Krauss, Esquire
Subject: HoneyKop Farm/Bushman's Gorge Lodge/Settler's Safaris

To whom it may concern:

My name is Charlie Krauss and I am a U.S. citizen and work as a patent attorney in the New York City, NY area of the United States. For the past six years I have visited and hunted with Settlers Safaris on HoneyKop farm and stayed at the Bushman Gorge Lodge. I have been so impressed with the quality of hunting and pristine beauty of the land that I have brought several groups of friends and family with me over the years. I estimate that me and my guests have spent almost R1,000,000,000 over the years all in or near the HoneyKop farm. One of the main reasons people visit Africa is to see that pristine beauty of the land and enjoy the outdoor wildlife.

I was horrified to learn that beauty is potentially going to be ruined by the presence of enormous wind turbines. I can only ask why? Does the community know what kind of economic impact this will have? I cannot think of too many Americans who would want to take a 20 hour flight to sit amongst wind turbines. If they wanted to do that they would not have to fly to Africa. In short, the impact on HoneyKop, Bushman's Gorge and Settlers Safaris would be devastating.

Please contact me at the address below if you would like further elaboration.

Sincerely,

Charles A. Krauss, Esquire
2 Longview Road
Tewksbury, NJ 08833 USA
charliekrauss@gmail.com

Re: If you have some time please read this email!

From: **DeFord, John** (John.DeFord@crbard.com)

Sent: 17 December 2011 08:08:54 PM

To: Murray Crous (bushmansgorge@hotmail.com)

Murray:

I'm so sorry for the delay in responding to your previous email. I was very surprised and shocked to learn that your neighbor is planning to install wind mills/ turbines near Honeykop Farm and Bushmans Gorge Lodge. As you know, it's a highlight of my year to travel to Settlers Safaris to both hunt and relax. The pristine bush and beautiful habitat is a real treat and will certainly be disrupted by the installation of wind mills. If this is to continue, please advice me on other possible locations to visit and hunt as we'll have to think carefully about coming back to Honeycop.

Sincerely,

John A. DeFord, Ph.D.
Senior Vice President, Science, Technology & Clinical Affairs
C.R. Bard, Inc.

Confidentiality Notice: This e-mail and any attachments are intended only for the use of those to whom it is addressed and may contain information that is confidential and prohibited from further disclosure under law. If you have received this e-mail in error, its review, use, retention and/or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message and any attachments..[v1.0]