

**FINAL ENVIRONMENTAL IMPACT ASSESSMENT
REPORT**

Boulders Wind Farm

Vol. 4

APPENDIX F-1

**Proofs of submissions received
from Authorities and Paternoster
IAPs**

September 2019





TABLE OF CONTENTS

Proofs of submissions received from I&APs 4

Authorities and Regulatory Bodies 4

Cape Nature 4

Saldanha Bay Municipality 6

Birdlife 7

DEA&DP..... 9

DEA 16

DWS 21

DRDLR 24

WC DM..... 25

West Coast Bird Club..... 26

Heritage Comments: IACom and APM 28

Paternoster Residents and Business 30

Muller, Cotzee 30

Slabig Hedwig 34

Brand, Deon 37

Kleynhans, Andre..... 43

Pickford, Peter..... 44

Wilkinson, Ian 47



PROOFS OF SUBMISSIONS RECEIVED FROM I&APs

Authorities and Regulatory Bodies

Cape Nature



CONSERVATION INTELLIGENCE

postal Private Bag X5014 Stellenbosch 7599
 physical Assagaibosch Nature Reserve Jonkershoek
 website www.capenature.co.za
 telephone +27 21 866 8000 fax +27 21 866 1523
 email astumar@capenature.co.za
 reference SSD14/2/6/1/8/4/WindEF_Boulders_Vredenburg
 date 21 June 2019

Dr Alan Carter
 CES East London
 25 Tacoma Street
 Berea
 East London
 5214

By email: info@cesnet.co.za

Dear Dr Carter

Re: Proposed Boulders Wind Farm in Saldanha Bay Municipality – Draft Environmental Impact Report.
 DEA Ref: 14/12/16/3/3/2/1057

CapeNature would like to thank you for the opportunity to comment on this application. Please note that whilst we are aware that a range of impacts have been identified, our mandate is to comment mainly on those which will have an impact on biodiversity.

Thank you for providing a comprehensive DEIR and associated specialist studies and Environmental Management Programme.

Terrestrial and freshwater ecology:

- Historically, most of the site was covered by Saldanha Granite Strandveld, with Saldanha Flats Strandveld occurring to the east. Although agricultural activities have transformed large portions of most of the site there are some remaining remnants of natural vegetation which are of high conservation importance. All remaining areas of natural vegetation have been determined as Critical Biodiversity Areas (CBAs)¹ due to the presence of endangered vegetation, the presence of rare and endangered plant species and special habitats. The findings of the botanical specialist has confirmed this. We are therefore please to note that no turbines will be located within areas of natural vegetation and that the new roads will not pass through any high sensitivity areas.
- The mitigation measures recommended for watercourse crossings should be adequate to reduce potential impacts on freshwater ecology and must be strictly implemented and monitored.

¹ Please use the Western Cape Biodiversity Spatial Plan (WCBSPP) 2017 which is hosted on behalf of CapeNature on SANBI's BGIS website.
 The Western Cape Nature Conservation Board trading as CapeNature
 Board Members: Prof Dorner Handricks (Chairperson), Prof Gavin Manaveldt (Vice Chairperson), Ms Margolette Bond-Smith, Mr Marvyn Burton, Dr Colin Johnson, Prof Aubrey Roddinghuis, Mr Paul Slack



Impacts on Bats and Avifauna:

3. We are generally satisfied with the monitoring and findings of the bat specialist study. Post-construction monitoring should occur for at least 2 years post-construction.
4. Impacts on avifauna remain of some concern especially as the adjacent wind energy facility, West Coast One is known to be causing fatalities of certain species and the potential cumulative impact is difficult to ascertain. As stated previously, the expected impacts based on the pre-construction data for West Coast One have been quite different to the actual impacts recorded post-construction.
5. The avifaunal specialist report did not provide detailed data regarding numbers of birds and flight paths and it is therefore difficult to determine whether the proposed mitigation measures are sufficient (although admittedly these are fairly standard across most wind farms). The report also does not evaluate the powerline linking the windfarm substation to the Eskom grid as the route had not yet been determined at the time that the avifaunal specialist report was compiled. However, Bioinsight have stated that where powerlines must cross sensitive avifaunal sites, that the powerlines must be marked (with bird-diverters) and the poles must be "bird-friendly" which CapeNature supports.
6. Taking into account the layout of the turbines, it is of some concern regarding how the construction teams are going to access all of the 45 turbine sites without impacting on the avifaunal no-go areas. There are a number of existing farm roads but these will have to be upgraded to enable transport of the large and heavy equipment. Where these roads pass through sensitive avifaunal sites, upgrades must be kept to an absolute minimum and new roads should not be located in the sensitive avifaunal areas at all.
7. We do note that one improved aspect of the proposed layout is that large portions of the north and west parts of the site are now free of turbines. This area has been determined to support substantial bird activity (specifically waterbirds).
8. The key part of the mitigation is the post-construction monitoring. The specialists have used the term "adaptive management" and this is important as situations change not only seasonally but also over the course of several years. The applicant must be made aware of the range of mitigation measures that may need to be proposed and be prepared to accept financial consequences. This applies for all mitigation measures laid out in the DEIR and EMPr and a statement from the applicant that he is willing and able to implement all proposed mitigation measures should be provided.

Environmental Management Programme (EMPr):

9. The EMPr provided is very comprehensive and we support the inclusion of inter alia a detailed rehabilitation plan and open space management plan. Strict and thorough implementation of the EMPr should ensure that environmental degradation is kept to an acceptable level.
10. With regard to plant and animal species relocations, please ensure that the necessary permits are applied for well in advance of site clearing needing to take place.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely

Alana Duffell-Canham

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Manau oidi (Vice Chairperson), Ms Margaerite Bond-Smith, Mr Marvyn Burton, Dr Colin Johnson, Prof Aubrey Rodlinghuts, Mr Paul Slack



Saldanha Bay Municipality



SALDANHA BAAI BAY
MUNISIPALITEIT | MUNICIPALITY | uMASIPALA

REF NO:
12/1/2/71

ENQUIRIES:
N. Duarte,
Ms

Ms Maura Talbot

REGISTERED MAIL

Coastal and Environmental Services (PTY) Ltd info@cesnet.co.za
m.talbot@cesnet.co.za

Dear Madam

RE: DEIAR: PROPOSED BOULDERS WIND FARM, WEST COAST DISTRICT MUNICIPALITY, WESTERN CAPE PROVINCE

1. The draft Environmental Impact Assessment report for the Proposed Boulders Wind Farm, West Coast District Municipality, Western Cape Province dated May 2019 refers.
2. The comments which were made at the Focus Group Meeting 20 June 2019 by the Environment and Heritage Manager is still relevant.
3. Saldanha Bay Municipality can use the subsoil material from the excavations as cover material for the Vredenburg Landfill. Please contact roberto.coetzee@sbm.gov.za should the proposed wind farm be authorised and the project commences.
4. Please make contact with the Khoi and San representatives in the Saldanha Bay Municipality jrasa169@gmail.com and zelda.williams05@gmail.com as Interested and Affected Parties.

T: (022) 701 7000 • F: (022) 715 1518
mun@sbm.gov.za • www.sbm.gov.za
Private Bag X12 • Vredenburg • 7380

S.M.A.R.T Future Through Excellence



5. TR2160 is currently undergoing an Environmental Impact Assessment process for widening and tarring of the road.

A handwritten signature in black ink, appearing to be 'pp'.

pp MUNICIPAL MANAGER

Date: 02 July 2019

Birdlife

On 10 Jul 2019, at 11:47, Greer Hawley McMaster <g.hawley@cesnet.co.za> wrote:

Good morning Sam

Hope all is well on your side? Crazy down here!

Our Cape Town office have been working on another Wind Farm application in the Western Cape. The CES CT office sent out notifications, but they are concerned that they have not received comment from Birdlife. Are you intending to submit comment? If so, when do you think you will submit?

Regards

Greer

From: Samantha Ralston-Paton [mailto:energy@birdlife.org.za]

Sent: Wednesday, 10 July 2019 15:27

To: Greer Hawley McMaster <g.hawley@cesnet.co.za>

Subject: Re: Birdlife comment on the Western Cape Boulders Wind Farm

Importance: High

Hi Greer

Many thanks to you and your team for checking in. I don't get around to commenting on all EIAs and I try to be strategic about the ones I do spend time on. It sounds like there have been plenty of I&AP interest, including from bird people so have not applied my mind to Boulders.

Take care

Sam



From: Greer Hawley McMaster

Sent: Wednesday, 10 July 2019 15:42

To: Maura Talbot <m.talbot@cesnet.co.za>

Subject: FW: Birdlife comment on the Western Cape Boulders Wind Farm

Importance: High

Hi Maura

Please see response from Birdlife below. My interpretation is that they will not be submitting comment due to the already significant involvement of other professional bird specialists.

Regards

Greer



DEA&DP



BETTER TOGETHER.

ENQUIRIES:

Ms Adri La Meyer (Directorate: Development Facilitation)
 Mr Rainer Chambeau (Directorate: Development Management)
 Ms Xoliswa Mazana (Directorate: Waste Management)
 Ms Shehaam Bitnikhulis (Directorate: Pollution and Chemicals Management)
 Mr Peter Harmse (Directorate: Air Quality Management)

DEPARTMENTAL REFERENCES:

16/3/3/6/4/2/1/F4/23/3167/19 (Development Management)
 19/2/5/3/F4/23/WL0083/19 (Waste Management)
 19/3/2/4/F4/23/DDF033/19 (Pollution and Chemicals Management)
 19/4/4/1/B51 – Boulders WEF (Air Quality Management)

DATE: 2 July 2019

The Board of Directors
 CES Environmental and Social Advisory Services
 25 Tecoma Street
 Berea
 EAST LONDON
 5214

For attention: Ms Maura Talbot

Tel: (043) 726 7809

E-mail: m.taibot@cesnet.co.za**PER E-MAIL**

Dear Madam

COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED BOULDERS WIND FARM ON PORTIONS 2 AND 5 OF FARM BOEBEZAKS KRAAL NO. 40, PORTION 2 OF FARM FRANS VLEI NO. 46, PORTION 3 OF FARM SCHUITJES KLIP NO. 22 AND PORTION 1 OF FARM HET SCHUYTJE NO. 21, VREDENBURG (DEA REF: 14/12/16/3/3/2/1057)

1. The Draft Scoping Report ("DSR") dated March 2018, the Department's comments thereto dated 3 April 2018, the e-mail correspondence received on 16 May 2019 indicating the availability of the Draft Environmental Impact Assessment ("EIA") Report, the Draft EIA Report dated May 2019 as received by the Department on 29 May 2019, this Department's e-mail of 29 May 2019 to the environmental assessment practitioner ("EAP") regarding the delivery of the Draft EIA Report, and the e-mail of 30 May 2019 granting further extension to provide comments on the Draft EIA Report, refer.

Please find consolidated comments from various Directorates within the Department on the Draft EIA Report.

11th Floor, 1 Dorp Street, Cape Town, 8001
 Tel: +27 21 483 2887 Fax: +27 21 483 4185

Private Bag X9086, Cape Town, 8000
www.westerncape.gov.za/eadp



2. Directorate: Development Facilitation – Ms Adri La Meyer (Adri.Lameyer@westerncape.gov.za; Tel: (021) 483 2887):
- 2.1 The Final Scoping Report (“FSR”) dated April 2018 for the proposed Boulders Wind Farm was accepted by the competent authority on 6 June 2018. The competent authority requested specific information requirements to be included in the EIA Report. This Directorate notes that the Draft EIA Report has not adequately addressed or included the following information requested by the competent authority, which must either be addressed in the Final EIA Report, or in a Revised Draft EIA Report, to be made available to all registered interested and affected parties (“I&APs”) per regulation 23(2) of the EIA Regulations, 2014 (as amended):
- 2.1.1 Comment xii: *All turbines located in the “not preferred” and “no-go” areas must be relocated or removed from the development.* This requirement has not been adhered to as the preferred recommendation of the Integrated Heritage Impact Assessment compiled by Katie Smuts dated November 2018 was not adopted by the applicant. (In this regard, also refer to paragraphs 2.6 and 3.2 below.)
- 2.1.2 Comment xv: *The bat and avifaunal specialist assessments must assess and make recommendations for definite measurements for the preferred hub heights and rotor diameter.* The Avifaunal Final Impact Assessment Report compiled by Bioinsight (Pty) Ltd dated July 2018 recommended that the “wind turbine lower blade tip has a minimum height of 55m as it is considered to minimise the risk of collision by elevating the rotor swept area above the movement flux of most of the bird species observed in the area.” It is not apparent from the Draft EIA Report and Environmental Management Programme (“EMPr”) dated May 2019 whether the recommendation of the avifaunal specialist will be implemented. The Draft EIA Report indicates that the wind turbines will have a maximum hub height of up to 120m and a tip height of up to 165m. Please indicate whether the wind turbine’s lower blade tip will have a minimum height of 55m as recommended in the Avifaunal Final Impact Assessment Report?
- 2.1.3 Comment xvii: *The EIA must include a detailed cumulative assessment of the facility if there are other similar facilities within a 30km radius of the proposed development site.* The Draft EIA Report fails to report on the cumulative impacts of the proposed development and the two other wind energy facilities (“WEFs”) within a 30km radius of the proposed site. Whilst the Draft EIA Report adequately assesses the cumulative impacts of the proposed development and the existing West Coast 1 WEF, it does not refer to the Isivunguvungu WEF (approved but not yet constructed). The Integrated Heritage Impact Assessment, Avifaunal Final Impact Assessment Report, Bat Specialist Study Final Impact Assessment Report compiled by Gaia Environmental Services (Pty) Ltd dated November 2018, and the Transport Impact Assessment compiled by Innovative Transport Solutions dated November 2018 have however assessed the cumulative impacts of the proposed development in relation to the existing West Coast 1 and yet-to-be constructed Isivunguvungu WEF.
- 2.1.4 Comments xxvi and xxvii: *An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.* The applicable specialist studies did provide a layout map of the proposed wind turbines and associated infrastructure superimposed on the environmental sensitivities/constraints. Ideally, the environmental sensitivity map of each specialist study should have been included in Section 9 (Key Findings of the Specialist Studies) of the Draft EIA Report. Since the location



of the proposed wind turbines and associated infrastructure were not indicated in Figure 11-3: (Specialist Specific Site Sensitivities) of the Draft EIA Report, it is difficult to determine how the various environmental sensitivities were considered in determining the final development layout. It is further recommended that a separate appendix containing the environmental sensitivity map of each specialist study, be included in the Final EIA Report.

- 2.2 The competent authority in its acceptance of the FSR, requested that the following information be included/ addressed in the EMPr:
- 2.2.1 Comments iv and v: *An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. Please see paragraph 2.1.4 above for comment regarding this requirement.*
- 2.2.2 Comments vi – xvi: Various plans to be included in the EMPr (i.e. Alien Invasive Management Plan; Plant Rescue and Protection Plan; Avifauna Monitoring and Management Plan; Re-Vegetation and Habitat Rehabilitation Plan; Open Space Management Plan; Traffic Management Plan; Transportation Plan; Storm Water Management Plan; Fire Management Plan; Erosion Management Plan and Fuel Storage Measures) are very generic and not specific to the proposed development and the proposed site. A revision of the plans, with specialist input, is required.
- 2.3 Table 2.3 of the Bat Specialist Study Final Impact Assessment Report dated November 2018 shows the “bat species which may be present at the proposed Boulders Wind Farm according to their modelled distribution”. Six of the bat species’ probability of occurrence were listed as “confirmed” in said table. However, Table 6-1 of the Draft EIA Report (Bat Species Likely to be Present at the Boulders Wind Farm Project Site) only lists four bat species as “confirmed”. The Draft EIA Report lists the Egyptian free-tailed bat, Cape Serotine, Long-tailed Serotine and the Namibian long-eared bat (all with a conservation status of “least concerned”) as confirmed. However, the Bat Specialist Study Final Impact Assessment Report, listed the Cape Horseshoe (near threatened), Geoffrey’s horseshoe (least concerned), Egyptian free-tailed bat, Cape Serotine, Long-tailed Serotine and the Natal long-fingered bat (near threatened) as confirmed on the proposed site. The discrepancies must be explained.
- 2.4 The Draft EIA Report did not indicate what the slope of the proposed site is. The Revised Draft or Final BA Report must include a slope analysis map/layer that include the following slope ranges:
- (i) Less than 8% slope (preferred areas for wind turbines and infrastructure);
 - (ii) Between 8% and 12% slope (potentially sensitive to wind turbine and infrastructure);
 - (iii) Between 12% and 14% slope (highly sensitive to wind turbine and infrastructure); and
 - (iv) Steeper than 18 % slope (unsuitable for wind turbine and infrastructure).
- 2.4.1 This Directorate notes that the Agricultural Assessment Study: Soils and Soil Suitability and Agricultural Economic Assessment compiled by F. Ellis and Johann Laubscher dated November 2018 does refer to the slopes on the site. For example, on page 4 of the Agricultural Assessment Study it is stated that “The highest points in the landscape and also with the steepest slopes (slopes up to 20 % and heights about 180 m above sea level) occur on the south eastern farm Portion 1 of Schuitje No 21” [sic]. Page 36 of the Agricultural Assessment Study indicates that “Regarding CARA requirements we can



mention that turbines are not planned to be placed on slopes exceeding 12%." Please indicate the slopes of the properties identified for the proposed development.

- 2.5 Comment from Heritage Western Cape on the proposed development must be obtained and included in the Final EIA Report to be submitted to the competent authority.
- 2.6 The Integrated Heritage Impact Assessment dated November 2018 indicated that "The preferred recommendation, in order to limit impacts to the cultural landscape, is that all turbines west of the Vredenburg-Stompneus Bay road be relocated or removed (Turbines 1-3, 5, 6, 15, 19, 21, 27, 31, 33, 36, 43)". Per the Integrated Heritage Impact Assessment, the positioning of wind turbines to the west of the Vredenburg – Stompneus Bay Road represents a very high negative impact to the cultural landscape of the Vredenburg Peninsula. The applicant however indicated that the preferred recommendation could render the project fatally flawed in terms of viability and an alternative proposal was adopted by the applicant, which includes the relocation of all turbines north of Kasteelberg to the west of the road.
 - 2.6.1 The Draft EIA Report does not provide a detailed description of the public participation process ("PPP") undertaken since the submission of the Application Form to the Department of Environmental Affairs ("DEA") and the acceptance of the FSR by DEA. It is thus difficult to determine why the applicant did not consider alternative layouts or sites, since the applicant initially applied for the proposed development over 10 land parcels. The Department, in its comments on the DSR, cautioned the applicant that the preliminary combined environmental sensitivity map for the proposed Boulders Wind Farm showed that the northern portion of the development site appeared unsuitable for the proposed development. The applicant was further advised that "the proposal of 45 wind turbines may not be feasible within the reduced developable footprint and that the final layout will be determined based on the findings of the various specialists in the EIA phase." Please also refer to paragraph 3.2 below.
- 2.7 The methodology for impact assessment (specifically the significance rating) was not consistently applied throughout the specialist studies. The Agricultural Assessment Study dated November 2018 used significance ratings of "virtually zero (i.e. an ignorable negative impact)" and "ignorable, small negative impact". Furthermore, the Agricultural Assessment Study referred to various annexures; however, Annexures 1 – 5 were not included in the specialist study.
- 2.8 The City of Cape Town's Floodplain and River Corridor Management Policy dated 2009 as referred to in the Freshwater Impact Assessment compiled by Scientific Aquatic Services dated November 2018, is not relevant to the proposed development.
- 2.9 The Sensitivity Map (Figure 7) of the Fauna & Flora Specialist Impact Assessment Report compiled by 3Foxes Biodiversity Solutions dated December 2018 must be updated to indicate the following:
 - 2.9.1 Numbering of the wind turbines; and
 - 2.9.2 Provide a legend to indicate what the environmental sensitivities are (e.g. red = critical biodiversity area).



- 2.10 Section 12 (Conclusions and Recommendations) of the Draft EIA Report do not provide specific conditions for approval as recommended by the EAP. The EAP merely indicated that "The mitigation measures for all impacts identified in the EIA must be incorporated into the EMP and must be used by the engineers during the detailed Planning & Design Phase, by the contractors during the Construction and Decommissioning Phases and by Vredenburg Windfarm (Pty) Ltd. during the Operation Phase". It is unclear whether all the recommendations of the various specialist studies are implementable and would be adhered to by the applicant, especially considering that the preferred recommendation of the Integrated Heritage Impact Assessment would not be implemented. The Avifaunal Final Impact Assessment Report Ltd dated July 2018 provided specific mitigation measures for the protection of the Secretarybird nest found in the centre of the Boulders Wind Farm site. Per regulation 3(1)(q) of Appendix 3 of the EIA Regulations, 2014 (as amended), the EAP must provide "a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation." (own emphasis).
3. Directorate: Development Management (Region 1) – Mr Rainer Chambeau
Rainer.Chambeau@westerncape.gov.za; Tel: (021) 483 8349;
- 3.1 Activity 24 of Listing Notice 1 of the EIA Regulations, 2014 (as amended) is not applicable to the development as the proposed roads will not have a road reserve and will not exceed a width of 8m.
- 3.2 According to the Draft EIA Report, Alternative Layout 2 (the preferred layout) was informed by the EIA process and associated specialist assessments. The Draft EIA Report further states that seven of the wind turbines were relocated to accommodate recommendations of the heritage and visual specialists and I&AP concerns. Reasons why only 7 of the recommended 13 turbines (west of the Vredenburg – Stompneus Bay Road) have been relocated must be provided in the Final EIA Report to be submitted to the competent authority.
- 3.3 Although the Draft EIA Report provides a summary of the key issues raised during the scoping phase, copies of the comments must be provided in the Final EIA Report to be submitted to the competent authority.
- 3.4 Proof of the PPP conducted must be included in the Final EIA Report to be submitted to the competent authority. Please note that the proof must include, *inter alia*, the following:
- 3.4.1 A copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication; and
- 3.4.2 Photographs showing the notice displayed on site and a copy of the text displayed on the notice.
- 3.5 With regards to the written notices provided, please note that the following must be provided:
- 3.5.1 If registered mail was sent, a list of the registered mail recipients, as obtained from the post office;
- 3.5.2 If regular mail was sent, a list of the mail recipients, as obtained from the post office;
- 3.5.3 If a facsimile was sent, a copy of the facsimile report;
- 3.5.4 If an electronic mail was sent, a copy of the electronic mail and delivery reports; and
- 3.5.5 If a "mail drop" was done, a signed register of "mail drops".



- 3.6 Section 10.4, page 73 of the EMPr states that "Guidance on appropriate fines for environmental damage or EMPr transgressions can be sourced from the City of Cape Town: Standard Environmental Specifications". Please be advised that appropriate fines for environmental damage and transgressions related to the proposed development must be stipulated in the EMPr.
- 3.7 The co-ordinates of the proposed roads must be included in the EMPr. Please further be advised that the co-ordinates of roads in Table 2-6 of the Draft EIA Report must be provided in degrees, minutes and seconds using the Hartebeesthoek94 WGS84 co-ordinate system.
- 3.8 The EMPr must include procedures for managing incidents and emergency situations in terms of section 30 and section 30A of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") respectively. (In this regard, also refer to paragraphs 4.2 and 5.3 below.)
- 3.9 General
- 3.9.1 It is noted that a separate application for environmental authorisation was submitted to the DEA for the proposed powerline and that 5 alternative powerline routes are being considered. According to the Draft EIA Report the co-ordinates of the proposed powerline alternatives are included in Table 2-2 of the Draft EIA Report. Please note that the co-ordinates were not included in Table 2-2. (In this regard, please also refer to paragraph 9 below.)
- 3.9.2 Originally signed declarations as completed by the applicant, EAP and specialists must be indicated in the Final EIA Report to be submitted to the competent authority.
4. Directorate: Waste Management – Ms Xoliswa Mazana (Xoliswa.Mazana@westerncape.gov.za; Tel: (021) 483 5845):
- 4.1 All actions stipulated in the EMPr must be adhered to and implemented throughout the various phases of the proposed development to ensure that the proposed development does not result in pollution or environmental degradation.
- 4.2 Incidents that fall within the ambit of section 30 of the NEM, 1998 must be dealt with as required. Incidents must be reported to, inter alia, the Environmental Officer at Saldanha Bay Municipality and this Department's Pollution and Chemicals Management Directorate.
- 4.3 A letter confirming Saldanha Bay Municipality's capacity to accept and dispose of solid waste generated by the development must be included in the Final EIA Report.
5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Shehaam.Brinkhuis@westerncape.gov.za; Tel: (021) 483 8309):



- 5.1 The EMPr should include management measures to be implemented in the event of bird mortalities, as these may be vectors for the spread of avian disease and result in contamination of the affected environment.
- 5.2 The following suggested additional technology alternatives are provided. Please indicate whether these suggestions are feasible and implementable:
- 5.2.1 The use of blade illumination (brightly coloured blades) to deter birds;
- 5.2.2 The use of radar technology to detect birds within proximity of the wind turbines; and
- 5.2.3 The use of ultrasonic acoustics to deter birds from coming within proximity of the wind turbines.
- 5.3 Per paragraph 4.2 above, any event resulting in spillage or leakage of hazardous substances onto land or into water resources must immediately be reported to the relevant authorities, including this Directorate, in accordance with section 30 of NEMA. Information related to the incident must include the reporting, containment and remediation procedures of such incidents and all necessary documentation must be completed and submitted to the relevant authorities within the prescribed timeframes.
6. Directorate: Air Quality Management – Peter Harmse (Peter.Harmse@westerncape.gov.za; Tel: (021) 483 8343):
- 6.1 It is anticipated that dust and exhaust emissions and noise will be generated during the proposed development. The generation of dust must comply with the National Dust Control Regulations (Government Notice No. R. 827 of 1 November 2013), promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). The EMPr must be amended to include the requirements of the National Dust Control Regulations.
- 6.2 The Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013 must be included in Section 1.4 (Legal Requirements) of the EMPr.
7. The applicant is reminded of the “general duty of care towards the environment” as prescribed in section 28 of the NEMA, which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”
8. Please direct all enquiries to the officials indicated in this correspondence should you require any clarity on any of the comments provided.
9. Please provide this Department with 1 x hard copy and 3 x CDs of the Draft Basic Assessment Report for the proposed Boulders Wind Farm powerline project (DEA reference 4/12/16/3/3/1/2010), marked for the attention of Ms Adri La Meyer at the Directorate: Development Facilitation.

Page 7 of 8

10. The Department reserves the right to revise initial comments and request further information based on any information received.

Yours faithfully

pp HEAD OF DEPARTMENT

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Copy to: Mr Lungu Dlova (DEA)

E-mail: LDlova@environment.gov.za



DEA



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447-PRETORIA 0001- Environment House 473 Steve Biko, Arcadia-PRETORIA
Tel (+ 27 12) 399 9372

DEA Reference: 14/12/16/3/3/2/1057

Enquiries: Mr Lunga Dlova

Telephone: (012) 399 8524 E-mail: LDlova@environment.gov.za

Dr Alan Carter
Coastal & Environmental Services (Pty) Ltd
PO Box 8145
EAST LONDON
5214

Telephone Number: (043) 726 7809
Email Address: a.carter@cesnet.co.za

PER E-MAIL / MAIL

Dear Dr Carter

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR PROPOSED BOULDERS WIND FARM WITHIN WEST COAST DISTRICT MUNICIPALITY, WESTERN CAPE PROVINCE

The application form and draft Environmental Impact Report (EIAr) dated May 2019 and received by this Department on 20 May, refers.

The Department has noted that the draft EIAr has complied with the requirement of EIA regulation, 2014 as amended.

- A detailed motivation not to consider other alternative sites was provided in the draft EIAr.
- Also the alternatives for placement of the Boulders Wind Turbines and associated infrastructure outside sensitive areas were considered in the draft EIAr.
- Efficient public participation process (PPP) during circulation of the final scoping report was undertaken and comments were addressed in the draft EIAr.

However, the Department draws your attention to the following:

- Please ensure that "road coordinates for the proposed Boulders Wind Farm project" on page 26 of the draft EIAr are presented in "Degrees-Minutes-Seconds" format.
- All Specialists are required to make use of the "Details of the specialist, declaration of interest and undertaking under oath" template, and include them when submitting the final EIAr. The Departmental template can be accessed on the Departmental website: <https://www.environment.gov.za/documents/forms>
- You are reminded to ensure that all issues raised and comments received during the circulation of the draft EIAr from registered I&APs and organs of state (**especially from Heritage Western Cape, BirdLife, DEA Biodiversity & Conservation**), which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr.
- Furthermore, ensure that proof of correspondence with the various stakeholders during the draft EIAr must be included in the final EIAr.
- Should you be unable to obtain comments, proof of the attempts that were made to obtain comments must be submitted to the Department for consideration.



General Comments

The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

You are further reminded that the final EIR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Environmental Impact Assessment Report in accordance with Appendix 3 and Regulation 23(1) of the amended EIA Regulations, 2014.

Please note; you are expected to submit the final Environmental Impact Assessment Report on or before 31 October 2019, not as previously mentioned in the letter signed by the Department on 07 May 2019.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.

Yours faithfully

Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Environmental Affairs
Signed by: Ms Pumeza Mngcisa
Designation: Deputy Director: National Infrastructure Projects
Date: 11/06/2019

cc	HD Ketselis	Vredenburg Windfarm (Pty) Ltd	Email: Cedric.ketselis@enerpon.co
	Pieter van Zyl	WC: Department of Environmental Affairs & Development Planning	Email: Pieter.vanZyl@westerncape.gov.za
	Nazoema Duzte	Sederha Bey Municipality	Email: nazoema.duzte@sedibem.gov.za

**environmental affairs**

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Inquiries: F Ditinti

Tel: (+27 21) 819 2499 Fax: (+27 21) 819 2445 E-mail: fditinti@environment.gov.za

CES - Environmental and social advisory services

67 African street

Grahamstown

6140

Tel: 046 622 2364 / Email: m.talbot@cesnet.co.za / m.johnson@cesnet.co.za

Dear Maura Talbot

SUBJECT: COMMENTS ON THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED BOULDERS WIND FARM

This letter serves to acknowledge receipt of the Background Information Document for the Proposed Boulders Wind Farm. The Department of Environmental Affairs Forestry & Fisheries Branch Oceans & Coasts (DEFF: O&C) has reviewed the report in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act") and further notes that the proposed development site is located 7km away from the coast. Thus, the proposed development activities will not have any potential impact on the coastal zone. DEFF: O&C will not be providing comments on this application.

Kindly note that DEFF: O&C reserves the right to revise its initial comments and may request further information. It is, therefore, a recommendation of DEFF: O&C that the EAP ensures that they submit all future reports for development within the coast via the address provided below. Please note that this should include both a hard copy and an electronic copy. All future correspondence and documentation submitted to this office should be addressed for attention to **Funanani Ditinti Physical Address: Department of Environment Affairs Forestry & Fisheries (DEFF), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.**

**environmental affairs**

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447- PRETORIA - 0001- Environment House - 473 Steve Biko Road, Arcadia, PRETORIA
Tel (+ 27 12) 399 9372

Reference: 14/12/16/3/3/2/1057

Enquiries: Seoka Lekota

Telephone: 012-399 9573 E-mail: siekota@environment.gov.za

Dr Alan Carter
Environmental and Social Advisory Services
25 Tecoma Street
BEREA, EAST LONDON
5214

Telephone Number: +27 (43) 726 7809
Email Address: info@cesnet.co.za

PER E-MAIL

Dear Dr Alan

COMMENTS ON THE PROPOSED BOULDERS WIND FARM FACILITY, WEST COAST DISTRICT MUNICIPALITY, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned report and its specialist's studies. The does not have any objection to the proposed development. It was noted that the site falls within the Critical Biodiversity Areas (CBAs) and most of which are in a natural state and also falls within the West Coast Biosphere Reserve.

In order to achieve the overall objective of minimizing the loss of biodiversity the following recommendations must be included in the Final Environmental Impact Assessment Report

- The Directorate recommend that a site visit be conducted, together with Cape Nature and Western Cape Department of Environmental Affairs and Development Planning before final Environmental Impact Assessment Report is finalised;
- Turbines must not be placed within high and very high sensitive areas within the proposed development site, and away from important habitat features for bats as well as bat roosts;
- The Search and Rescue of all protected species and species of biodiversity concern must be conducted before areas are cleared, and
- The Plant Rescue and Protection Plan must be compiled by ecological specialist and be implemented. The affected species must be trans-located to a similar habitat outside the development footprint and marked for monitoring purposes;



- All sensitive habitats must be clearly demarcated as No-Go Areas with fencing or orange mesh netting. Barricading measures to be utilized must not restrict the movement of fauna in the project area;
- No structures should be located within 32m of any surface water feature such as the water courses, wetlands and farm dams;
- Cape Nature and Western Cape Department of Environmental Affairs and Development Planning must be consulted for recommendations;
- Concurrent rehabilitation and alien vegetation control program within all sensitive areas must be implemented;
- The recommendations proposed in the Ecological, Avifauna and Bats assessment specialist reports are supported and must be implemented during construction and operational phases; and
- All protected fauna and flora species of conservation concern must not be disturbed or removed prior to permit approval from relevant National and Provincial authorities.

The major impacts due to the proposed development, include habitat destruction and loss of protected plant species. Therefore, in order to achieve the objective biodiversity the above mentioned recommendations must be adhered to.

Yours faithfully

PP
Mr Stanley Tshitwamulomoni
Control Biodiversity Officer (Gr B): Biodiversity Conservation
Department of Environmental Affairs
Date: 05/07/2019



DWS



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

WESTERN CAPE REGION

Private Bag X 18, Bantierhof, 7532 / 02 Voorbeker Road, Bellville 7530
Tel #: (021) 941 8000 Fax #: (021) 941 8077

Enquiries : N. Ndobini
Tel # : (021) 941 8140
Email : ndobini2@dwsc.co.za
Reference : 16/27/G10MA/11

CES
25 Tecoma Street, Berea
EAST LONDON
5214

Dear Madam

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED BOULDERS WIND FARM, SALDANHA BAY

Reference is made to the above-mentioned document dated May 2019 with DEA reference number 14/12/16/3/3/2/1057.

This Department has perused the abovementioned documents for the establishment of a wind farm and has the following comments:

- The proposed development area is located within a 500m boundary radius from the edge of a wetland i.e floodplain wetland, hillslope wetland and numerous channeled valley bottom wetlands. This triggers a water use in terms of section 21 (c) "impeding or diverting the flow of water in a watercourse and section 21 (i) altering the bed, banks, course or characteristics of a watercourse of the National Water Act, 1990 (Act 36 of 1998). Please advise your client to apply for and obtain a Water Use Authorisation from this Department prior to commencing with any of the activities, as per Government Gazette No. 40229 in Government Notice 509 dated 28 August 2016, with the completion of a Risk Matrix (Appendix A). The risk matrix can be found on the Department's website www.dws.gov.za under Document Library – Documents – "Section 21 (c) and (i)" – click all scroll down to "Final Risk Assessment Matrix".
 - You are hereby advised to arrange for a water use authorisation pre-application meeting with the Department to advise on the water use authorisation process. Please note that as from January 2018, this Department ONLY accepts electronic water use applications.
 - Water use applications can be submitted by following <http://www.dws.gov.za/projects.aspx> and then click on e-wulas.
 - No pollution of surface water or ground water resources may occur due to any activity on the property.
- Measures to control illegal dumping of construction waste must be put in place as this may result in pollution to the surface water run-off.



NATIONAL DEVELOPMENT PLAN
Our Future - make it work



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

- No abstraction of surface or groundwater may be done without prior authorisation from this Department, unless it is a Schedule 1 Use or an Existing Lawful Use.
- Storm-water runoff must be controlled to ensure that on-site activities do not culminate into off-site pollution.
- All the requirements of the National Water Act, 1998 (Act 36 of 1998) in terms of water use and pollution control management must be adhered to at all times.

Please do not hesitate to contact the above office should there be any queries.

Yours sincerely

REGIONAL HEAD:	WESTERN CAPE
Signed by:	Ms N Ndobeni
Designation:	Control Environmental Officer
Date:	12 AUGUST 2019



NATIONAL DEVELOPMENT PLAN
Our Future - make it work



DRDLR



rural development & land reform

Department: Rural Development and Land Reform REPUBLIC OF SOUTH AFRICA

PROVINCIAL SHARED SERVICES CENTRE: WESTERN CAPE, 14 LONG STREET, CAPE TOWN Private Bag X9159, Cape Town, 8000 Tel: 021 409 0300 Web: www.drdir.gov.za

21 May 2019

CES Environmental and Social Advisory Services Coastal and Environmental Services (Pty) Ltd. The Point Suite 408 76 Regent Road Sea Point 8005

Attention: Maura Talbot or Michael Johnson e-mail: cesct@cesnet.co.za

BOULDERS WIND FARM: COMMENT ON DRAFT EIA REPORT (MAY 2019)

To whom it may concern,

I herewith confirm receipt of a copy of the Draft Environmental Impact Assessment Report from CES dated May 2019.

The Department of Rural Development and Land Reform (DRDLR) has no objection to the development of the proposed wind farm with the implementation of the associated mitigation measures, with specific focus on agricultural practices and protection of water resources. None of our current Rural Development and Land Reform Projects are directly impacted by the proposed development.

In addition to our role in Rural Development, the Department is also the custodian for the Spatial Planning and Land Use Management Act 16 of 2013 (SPLUMA). It is noted that this legislation is reflected under "Other Legislation" under Section 4.1.17 on page 52 of the Draft Report and should be elevated to a key National Legislation dealing with all land development in South Africa in the final EIA Report. This legislation is the Framework legislation for the Western Cape Provincial Land Use Planning Act (LUPA), which replaced the Land Use Planning Ordinance 15 of 1985 in the Saldanha Municipality, even though the Section 8 regulations still apply to the rural area. The Saldanha Municipality will consider this land development proposal in terms of their Municipal Planning by-laws. Please amend the draft EIA Report (Section 4.2.4 on page 53) to reflect the legislative changes accordingly.

Do not hesitate to contact us should you require additional information.

Yours faithfully

Ms E van Zyl



Departement van Landelike Ontwikkeling en Grondverreeming - Ukhaywigo Wezokuthulakwa Kweziqandiso Zamaqhaya Hahngqulako Kweziqandiso - Mntsho wa Mvelo/Idolo ya Mafayeni ne Ibundzoboko ya Mvelo - Hahngqulako ya Nkululeko wa Mafayeni ne Ibundzoboko wa Mvelo - Lafayite la Tihobozo ya Mqale la Hahngqulako ya Mafayeni - Lafayite la Tihobozo ya Diboko wa Mafayeni - Igqirya ya Tihobozo ya Dingenengwe la Phawuyizoboko ya Mqale - Sibeko loPhuhliso kwamaPhando noMafayeni Hahngqulako - Ukhaywigo wokuTuthulakwa (Iziko zamaqhaya) nokukhulakwa kwamaqhaya - Ukhaywigo wokuTuthulakwa kwamaqhaya Hahngqulako kwamaqhaya



WC DM

From: Doretha Kotze <dkotze@wcdm.co.za>
Sent: Tuesday, 18 June 2019 16:09
To: Louise Van Aardt <info@cesnet.co.za>
Cc: Michael Johnson <m.johnson@cesnet.co.za>; Maura Talbot <m.talbot@cesnet.co.za>; Collaborate Mailbox <westcoastdm@wcdm.co.za>
Subject: RE: Boulders Windfarm PPP Advert

Ref: 13/2/12/3/4

Sir/Madam

I refer to the Draft EIR for the proposed Boulders Wind Energy Facility.

The West Coast District Municipality has the following comments on the DEIR:

1. The West Coast District Municipality deems the visual impact of the proposed Boulders WEF unacceptable.
2. The existing West Coast One WEF already has a negative visual impact on the environment and an additional WEF will exacerbate this situation.
3. Furthermore, the turbines proposed for the Boulders WEF will be significantly higher than those at West Coast One WEF.
4. The area in question is considered important in terms of tourism in the West Coast Region and the development of another WEF on this peninsula will detract from the scenic beauty of the area and cannot be supported.

Regards

Doretha Kotze
Stads- en Streekbeplanner/Town and Regional Planner
Weskus Distriksmunisipaliteit
Langstraat 58 Long Street
Posbus 242 PO Box
MOORREESBURG 7310
Tel: 022 433 8523
West Coast District Municipality





West Coast Bird Club



WEST COAST BIRD CLUB

PO Box 1404, Vredenburg 7380

Affiliated To Birdlife South Africa

From, Keith Harrison, Conservation.

P.O. Box 1404, Tel, 022 – 7133026.

Vredenburg, Email. keithhbharrison@lando.co.za

7380,

To Maura Talbot, Coastal Environmental Services (Pty) Ltd. (CES).

Tel, 021 – 045 0900.

Email, m.talbot@cesnet.co.za

Date 30th. June 2019

Ref:- Proposed Boulders Wind Farm, Western Cape Province. DEA 14/12/16/3/3/2/1057.

Dear Maura Talbot,

Thank you for the link to the above project and the public meeting (Tourism) at Paternoster, the information was well presented and able to be understood. However there are several comments and questions that I have been asked to make.

1. CES is involved in three major projects which can effect environmentally upon the West Coast Peninsula,
 - (a) Coastal Management Plan for the West Coast District Municipality.
 - (b) Boulders Wind Farm.
 - (c) Prospecting for Phosphate ore on Duiker Eiland, which is the third largest known deposit in South Africa. Therefore the decision not to place turbines to the West of the Paternoster/Strompneus Bay gravel road could be due to a conflict of projects, although it was requested to protect a bird flyway.
2. Boulders is to be built adjacent to West Coast No.1 with no corridor between the two sites. The priority is to extract 140 MW from available land. A map is required showing the position of turbines for both sites along the boundary at 23, 28 30,4,42 and 1. There appears to be a wide gap going over the ridge and all that is required is a 200 metre wide corridor. This section is where African Fish Eagles from the Berg River cross the ridge on their way to Paternoster, return by flying over the sea.



This corridor will also be mitigation for Bats hunting the northern ridge.

3. The observation of the action of Sea Fog confirms the problems encountered and evening observations are required, unfortunately a Sea Fog event cannot be predicted (I had the problem while counting Cape Cormorants entering the Berg River) only that the fog comes with a Northern wind. There has been a large kill of Common Terns on the West Coast road North of Laaiplek of birds disorientated by fog and colliding with telephone lines.
4. Collisions are not all caused by turbine blades, there are collisions with the towers and infrastructure, transformers and buildings, could towers and buildings be painted a more distinctive colour (not black birds do not see black)?
5. Outside lights to be motion activated so as not to cause light pollution and attracting insects. This would also be mitigation for Bats.

Has the effect of sound and vibrations from the turbines upon ground nesting species as recorded in the USA been considered?

6. The area is a large 'natural' habitat where natural fauna has had access, therefore access points must be designed in sections of fences to allow large mammals passage to their traditional feeding areas. Similarly, sections of fencing to be raised above ground level to allow small mammals and reptiles passage.

All farm, turbine and natural dead animal and bird carcasses to be immediately removed upon finding to prevent the attraction of carrion feeding birds to the site, which can result in collisions.

7. Road access to site, dangerous large Lorries and vehicles transporting sections of turbines cannot be routed through Vredenburg High Street. The R27 to R399 and West Coast No.1 route must be used.
8. Where is the large amount of excavated spoil from foundations to be disposed of?
9. Labour, all semiskilled and unskilled labour to be recruited from Paternoster, St. Helena Bay, with proven residence for 5 years or on the Voters Roll. The reasons are the negative social effects of in-migration during construction phases being without employment when construction is completed.
10. For alien species clearance and maintenance there are teams trained by local NGOs available, for example CWCBR.
11. Vehicles, of Developer, Contractors and Subcontractors to be registered with the Vredenburg Traffic Department in order that some portion of the licence fees can be utilised for road infrastructure maintenance.
12. Off-sets should be considered and are where a development finances conservation of local endangered habitats to compensate for the loss of habitat due to the development. There are areas on the West Coast, for example the WWF area at Jacob's Bay.



13. Bats, the report indicates weather conditions have a significant bearing upon bat activity, temperature below 11 degrees C, rain for the night above 4mm and wind speed above 9 m/sec. could these be factored into start up procedures?

Bat activity on the North West edge can during daylight be mirrored by the swifts and swallows which can be seen feeding upon insects blown over the ridge by the South wind.

14. Mitigation, due to objections caused by visual pollution and cumulative effect of Boulders basically doubling the area of West Coast No.1, possibly a solar project could replace the WEF approach? There are three solar projects close by in the EIA process which would feed into the 132kV power line to Aurora switching station.
15. The West Coast Bird Club objects to the project until a map showing the turbines and distances bordering upon the two WEFs is available.

Sincerely,

Keith Harrison.

(Sent by Email 2.7.2019)

Heritage Comments: IACom and APM

From: Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>
Sent: Friday, 28 June 2019 15:21
To: Katie Smuts <katie.smuts@gmail.com>
Cc: Maura Talbot <m.talbot@cesnet.co.za>
Subject: RE: Boulders wind farm Draft EIA

Good day Katie

Please see below the comments from IACom and APM. I will only have the signed various possibly next week.

APM comment

Comment

The proposed nomination of Kasteelberg and Cape Columbine light house as PHS's is strongly supported.

The 2km buffer around Kasteelberg archaeological complex to be maintained.

The recommendation that no turbines are to be constructed to the west and north west of the Paternoster-stompneus bay link road is supported.

The cumulative impact of wind farms on the archaeological sites and cultural landscape the Vredenburg peninsula should be indicated graphically on a map.

Decision

APM proposes that the Kasteelberg archaeological complex is graded II and is nominated as a Provincial Heritage Site.



IACOM comment

DISCUSSION

Amongst other things, the following was discussed:

It was noted that the application was tabled with HWC at this stage, in order to obtain interim comment from HWC, and to ensure compliance with the provisions of s38(3)(e) of the NHRA.

Concerns raised by the objectors were primarily in respect of the impact of the proposed wind farm on the cultural landscape, and the impact of the development on the town of Paternosters economy, particularly as a tourist attraction.

The primary concern with the visual impact was in respect of the Kasteelberg, which was noted to have been recommended as a Provincial Heritage Site (PHS) previously, as well as the Columbine Lighthouse.

In response the consultant noted that the issue of the declaration of the Kasteelberg as a PHS is something that must be addressed by HWC, however notwithstanding, the Kasteelberg is regarded as a significant Heritage Resource.

The recommendations contained in the HIA, are to further mitigate the impact of the Turbines on the landscape, and that new turbines, noted as being smaller than ones existing, are recommended to be relocated, or removed from the West of the Vredenburg-Stompneus Bay Road.

The Committee noted the recommendations, and endorsed these in principle. It was however suggested that the HIA and VIA be expanded to include an assessment of the view corridor from the Kasteelberg to the Coast. It was also recommended that the impact of light pollution from the Turbines at night is also assessed.

The VIA should include a more realistic montage showing the impact of the Turbines on the cultural landscape.

It was recommended that the HIA and VIA as tabled must also be submitted to the APM in order to obtain a holistic comment.

INTERIM COMMENT:

The Committee will await the updated submission for Final Comment

Kind regards,

Stephanie-Anne Barnardt Heritage Officer (Archaeology)

Heritage Western Cape

3rd Floor, Protea Assurance Building

Green Market Square

Cape Town





8001

t) 021 483 9689

Paternoster Residents and Business

Muller, Cotzee

POLICY FOR SUSTAINABLE COASTAL DEVELOPMENT IN SA: RELEVANCE TO THE PROPOSED BOULDERS DEVELOPMENT NEAR PATERNOSTER.

Seeing this fourth attempt now at developing the same site (each time under a different name) for a 45- turbine wind farm on actively farmed coastal land, I cannot but have a feeling of great disappointment in the way our Coastal Policy for SA, that achieved international recognition as an example of best practice policy are simply being ignored in the EIA of the above proposed wind farm.

In order to demonstrate the relevance of the Coastal policy, I will highlight some of the key messages in the White Paper,

*“At present, management efforts related to development are typically **focussed on the short-term, and are reactive, fragmented and uncoordinated.** As a result, **development opportunities are being squandered.** A dedicated Coastal Policy is needed to promote integrated management of the coast as a system, in order to harness its resources for sustainable coastal development”*

1. Key messages of the coastal policy directly relevant to the proposed wind farm

*“It is essential that coastal management contributes to achieving the **Constitution’s commitment to improving the quality of life of all citizens, while protecting the natural environment for the benefit of present and future generations.**”* – Our coast is unique and Paternoster is probably the best example of good coastal development in SA, attracting tourists from all over the world. The proposed wind farm has the potential of reducing the quality of life, negatively impacting on the sense of place. This while **the wind farm will not benefit the local community at all**, except the farm owners who will be leasing their land to the Wind Farm Developer. The wind energy will be pushed into the Eskom grid and may benefit someone somewhere, but not necessary on the coast. That is if Eskom survives. The coastal town of Paternoster, needs to make many sacrifices in order to allow:

- **local farmers** producing milk and wheat to let huge portions of their farms to a Private Energy Company that possibly has no association with Paternoster. Will the farmers still maintain an inter
- The **private developer** to generate wind energy that is sold to a near bankrupt Eskom
- **Eskom** feeds the wind energy into the national grid which supply electricity users elsewhere in SA. What is going to happen if Eskom no longer needs the wind energy or cannot afford to pay a fair price.



- Will the wind farm remain in use and be maintained?
- Would the farmers still have an interest in farming with milk cows, wheat etc. when they can live of the income from the wind farm leases. Are these farms going to become a windblown sandy and eroded landscape?
- Will the tourists still be interested in coming to Paternoster. If not, the shops, restaurants and rental apartments will have to close their doors and the local community that is dependent upon these tourist related activities will become poverty stricken.

“Failure to invest in coastal management now through a dedicated coastal policy will result in a degraded coastal environment and leave many coastal communities in poverty, thereby reducing options for future development in South Africa”.

“In addition to direct and indirect benefits, to which a value can be given, our coast has significant aesthetic, cultural educational, scientific and spiritual value and the attractive lifestyle, recreational and tourism opportunities offered by a coastal location. These features depend on the maintenance of a high-quality coastal environment through effective coastal management. Our valuable coastal assets and future development opportunities will be squandered, unless we maintain a healthy coastal environment. “

“The new approach moves away from a “command-and-control” approach to coastal management to one in which effective enforcement of legislation where necessary is combined with a new emphasis on creating incentives for effective coastal management. The new management style put forward in this Policy seeks to facilitate rather than simply to regulate, and to build a co-operative approach to effective coastal management. It is also a people-centred approach that recognises the importance of harnessing the positive and creative energies of all stakeholders in realising sustainable coastal development”. The question is whether public input really matters in the decision-making processes of National and Provincial Government. It is often observed that the public makes a lot of effort to make objective input to EIA processes and not even receives acknowledgement or an informed response to the comment received.

“With regard to the environment, Section 24 of the Constitution states that everyone has the right to an environment that is not harmful to their health or wellbeing and the right to have the environment protected for the benefit of present and future generations.”

There are numerous cases where residents near wind farms complain over the persistent humming noise, that cannot be switched off and driving them crazy. Birding in the area is also a popular tourist activity and therefore there is great concern as to how the wind farm will effect birds passing by on their migratory paths.

The Coastal Policy notes that the potential exists in our West Coast Region for the development of small-scale industries that add value to fishing, horticulture and mariculture, and for tourism-promotion initiatives, including the development of rail and air links.



VISION

We, the people of South Africa, celebrate the diversity, beauty and richness of our coast and seek an equitable balance of opportunities and benefits throughout it.

We strive for sustainable coastal development – involving a balance between material prosperity, social development, cultural values, spiritual fulfillment and ecological integrity, in the interests of all South Africans.

We strive for a time when all South Africans recognise that the coast is ours to enjoy in a spirit of community.

We look forward to a time when all South Africans assume shared responsibility for maintaining the health, diversity and productivity of coastal ecosystems in a spirit of stewardship and caring.

We seek to guide the management of our coast in a way that benefits current and future generations, and honours our obligations and undertakings from local to global levels.

“It is important to state explicitly that the development of the national vision, as well as the principles, goals and objectives for coastal management, are based on an assumption of the need to respect and cherish the rich and diverse heritage of our coast. Different parts of our coast have distinct qualities, offering comparative and competitive advantages for future development.”

One would expect that anyone doing an EIA on the coast should at least reflect on the Vision and Principles underpinning the vision as outlined in the Coastal Policy, which Government seem to have forgotten in their often naïve commitment towards economic development at all cost.

KEY PRINCIPLES

National asset

The coast must be retained as a national asset, with public rights to access and benefit from the many opportunities provided by coastal resources.

Economic development

Coastal economic development opportunities must be optimised to meet society's needs and to promote the wellbeing of coastal communities.

Social equity

Coastal management efforts must ensure that all people, including future generations, enjoy the rights of human dignity, equality and freedom.

Ecological integrity

The diversity, health and productivity of coastal ecosystems must be maintained and, where appropriate, rehabilitated.



Holism

The coast must be treated as a distinctive and indivisible system, recognising the interrelationships between coastal users and ecosystems and between the land, sea and air.

Risk aversion and precaution

Coastal management efforts must adopt a risk-averse and precautionary approach under conditions of uncertainty.

Accountability and responsibility

Coastal management is a shared responsibility. All people must be held responsible for the consequences of their actions, including financial responsibility for negative impacts.

Duty of care

All people and organisations must act with due care to avoid negative impacts on the coastal environment and coastal resources.

Integration and participation

A dedicated, co-ordinated and integrated coastal management approach must be developed and conducted in a participatory, inclusive and transparent manner.

Co-operative governance

Partnerships between government, the private sector and civil society must be built in order to ensure co-responsibility for coastal management and to empower stakeholders to participate effectively.

Some other important Goals of the Coastal Policy as adopted by Government, but not applied by Government.

COASTAL PLANNING AND DEVELOPMENT GOALS

“Goal C1 : To promote the diversity, vitality and long-term viability of coastal economies and activities, giving preference to those that are distinctly coastal or dependent on a coastal location”

Surely the proposed wind farm is not coastally dependent and can be and has been developed all over the country. In any case the electricity generated by the wind farm will not be supplying electricity to Paternoster, as it will disappear in the National grid.

Examples of coastally dependent development includes: Ports and related development. Mariculture, Tourism, leisure and recreation.

Goal C2 : To alleviate coastal poverty through proactive coastal development initiatives that generate sustainable livelihood options.

Wind farm will not contribute towards achieving this at all. In fact it may significantly compromise the ability to achieve this goal

“Goal C3: To maintain an appropriate balance between built, rural and wilderness coastal areas”.

Not respected by the Wind farm developers

Goal C4: To design and manage coastal settlements to be in harmony with local and regional aesthetic, amenity, biophysical and cultural opportunities and constraints



Paternoster has been able to achieve this to some extent. However, the wind farm may very well compromise the achievement of this goal.

*“Our coast is a special **national asset** that should be planned for and managed in the long-term public interest. All South Africans, particularly organs of State, have a responsibility to ensure that its use is planned and managed in the public interest.”:*

- Prevent exclusive use
- Ensure that more people benefit from coast
- Minimise adverse impacts on environment
- Promote the preservation and protection of archaeological sites

“Coastal planning and management should be undertaken proactively to optimise sustainable development opportunities”.

- Diversify coastal economies
- Consider alternative livelihood opportunities
- Promote mariculture opportunities
- Retain revenues generated in local areas
- Promote local benefits from tourism
- Promote tourism and local cultural values
- Improve infrastructure for tourism
- Encourage the establishment of buffer and transition zones
- retain aesthetic values

Prepared by Muller Coetzee, Family Tides, 58 Mosselbank road, Paternoster.

jdmcoetzee@gmail.com, 0833258732

Slabig Hedwig

From: Hedwig <slabigh@gmail.com>

Sent: Tuesday, 02 July 2019 21:07

To: Maura Talbot <m.talbot@cesnet.co.za>

Subject: Boulders Wind Farm Comment

Hello Ms Talbot

I am forwarding this to you on behalf of my friend Kiffie Smit, as he has been away from home, (and computer) keep well Hedwig Slabig

My name is Christopher Johan Smit,

kiffie smit <soutpanh@gmail.com>



I live and more work at Paternoster Oyster Company oyster farm situated on the old Salt pans between a portion of Uitkoms and Swartrug Farms and have a life rights to my residence.

I have lived here for approximately 20 years and my view from my house is of the salt pans with a daily display of water birds, and to the east, Kasteelberg where the sun and moon rises, and now for the past few years, approximately 20 visible Wind turbines. The visual impact of more turbines, larger and more bulky, both during the day (in a duplicate, is they reflect on the water) and the flashing lights at night, would it be totally unacceptable.

I wish to question the accuracy of the Avian Study as only once or twice, to my knowledge, there were people monitoring the birds on the Salt pans.(they had to drive past my house and ask permission to be there) The Pans are home to 100s of smaller water birds e.g. Ducks and waders, but it is specifically the flamingos that are year -round visitors as the pans do not dry up completely.

Now that the farm is again operational, the pans will be full year-round and attract even more birds.

Blue cranes use the pans as their Night roosts, landing after dark and flying away before first light.

Both the flamingos and the blue cranes use the pans as their base and leave to forage in other areas, often flying in flocks of between 70 - 150 birds in the direction of the proposed Wind turbines.

The safety and conservation of wildlife in the area has never been priority to the farmers of the vicinity and there has been a long and agonising history of poisoning animals, wild and domestic at random, also leading to secondary death of carnivorous animals and birds.

In contrast to this, of the coastal properties on either side of the salt pans, one is a declared private nature reserve and the other earmarked for eco-development and no mitigation measures could be put in place that would justify Wind turbines in this layered and special landscape.

Kiffi Smit

From: Hedwig <slabigh@gmail.com>
Sent: Wednesday, 03 July 2019 01:01
To: Maura Talbot <m.talbot@cesnet.co.za>
Subject: Boulders Wind Farm

Attention Ms Talbot
Re Proposed Boulders Wind Farm DEA14/12/16/3/3/2/1057

1] I support the comments submitted by Alvin Roon/action Paternoster aksie.

2] I am submitting the Environmental Authorisation for Moyeng/West Coast 1 Windfarm and will refer to it in my comments as WC1 and the relevant point numbers.(see above)

As it are adjacent to the proposed Boulders dev, the same criteria should apply.

I again raise the Cumulative Effect of the 2 Wind Farms right next to each other.

It becomes a Giant farm with 92 turbines and should be seen in the VIA and Avian study as such.



3] HERITAGE

Were any representatives from the Khoi-Khoen approached to comment about Kasteelberg?

It is now finally agreed that all Turbines will be 2 km from Kasteelberg?

Turbines of the same height as WC1 will be far more acceptable.

All the roads around Kasteelberg have recently been included in a heritage and cultural study done for SBM by O'donahue and Kaplan as a Scenic route/drive.

This report has been accepted by the SBM.

It therefore follows that WC1 10.7.4 must strictly be adhered to and that turbines must be placed at least 2 km from the local road from Vredenburg to Stompneus Bay.

It would also make sense to ask for an offset in the form of the landowner agreeing to the formal declaration of Kasteelberg as provincial heritage site.

4] TOURISM:

President Ramaphosa in his speech at the Tourism Indaba in Durban said that Tourism is SA's 'new Gold'

Paternoster has been 'mining' this Gold for many years.

The hotel and Tietiesbaai Camping site has had a loyal following for many, many years.

Until the 1990's Paternoster had no individual land ownership.

Land was zoned Agricultural and the farms belonged to 3 large Fishing Companies..

The houses forming the village were on Agricultural land.

Early 1990's empty land was sold off to developers and Mosselbank/Bekbaai was subdivided and the SBM initiated a "building style" similar to the local vernacular and an Ethics committee was appointed.

Kliprug residents got ownership of their houses and a self-build housing initiative started for other residents.

With the lack of areas with zoning for Business, historical properties were converted to Shops and Restaurants,

'Granny flats' were allowed by SBM for a fast-growing self-catering market. This extra income was a good selling-point and the village was busy all year round.

Local women retrenched from fishing-factories in St Helena Bay started being trained/upskilled and working in tourism-related jobs.

A DTI initiative was to tar the dirt road in 2000 and Paternoster has never looked back.

The historical layers, "sense of place", beautiful landscape and the sea and the beach need individuals from all walks of life that put effort and money and pride in to make Tourism work.

All this is swept away as being insignificant against the "greater good" of Electricity generation (with very little direct benefit to Paternoster) that could happen in almost any windy area in SA.

I suggest that your Tourism/Property/Socio-economic Studies seriously be revisited.

5] BOTANICAL

Please register the West Coast branch of Botanical Society as I&AP again, it seems it got lost in the re-registration process.

I will be the contact person.

I draw your attention to WC1 10.2.12 re Contract nature reserve and strongly suggest that the area around Kasteelberg go into Stewardship.

I suggest that SANBI/CREW be allowed to walk the areas now in the growing season to draw up an independent plant list if they deem it necessary.



Keep well
Hedwig Slabig

Brand, Deon

02 July 2019

1. Background

I am a Paternoster property and business owner, I represent the following entities in addition to myself:

- (i) Strandloper Ocean Boutique Hotel (“SOBH”);
- (ii) Leeto Restaurant (“Leeto”);
- (iii) The La Baleine Beach House Collection (“LBBHC”);
- (iv) The Cottage Collection (“CC”);
- (v) The Laureate Private Resorts Trust;
- (vi) The Strandloper Investment Trust;
- (vii) La Baleine (Pty) Ltd (“LB”);
- (viii) The Paternoster Beleggings Trust;
- (ix) Erf 1050 Paternoster (Pty) Ltd (“Erf 1050”).

Over a short period of time Paternoster has made big strides to change its economy from fishing to tourism. The inhabitants of the town (it has a population of approximately 2000 people) primarily remain fishermen who have been living in Paternoster for generations. Income that can be attained from fishing is drastically diminishing and the town relies on tourism to provide for the livelihood of its people. The livelihood of the town is therefore highly vulnerable to any threats to its tourism industry and this risk is fundamental to my analysis of the BWF Project.

I have witnessed Paternoster’s transformation and growth throughout the past fifty years and am one of the first investors in the town when its development started about 20 years ago.

As the EIA draft and its specialist reports contain such vast amounts of information which is very challenging to study in its entirety, I focused on the following reports:

- (i) The Visual Impact Assessment of Mr Lourens du Plessis (the “VIA”);
- (ii) The Urban-Econ report which deals with Property Values, Tourism and Economics Issues Assessment Report (the “UE Report”) the;
- (iii) The Social Impact Assessment by Mr Tony Barbour (the “SIA”);
- (iv) The Heritage Impact Assessment by Ms Katie Smuts (the “HIA”).



I was responsible for the appeal which was lodged due to the scoping report being biased. This is still in process. Although better care was given in the latest studies than in the scoping report, the draft EIA is still showing significant bias in favour of the developer and seems like an attempt to demonstrate compliance biased in favour of the developer.

2. The Visual Impact Assessment (“VIA”)

I would like to bring the following to the attention of Mr Du Plessis, the author of the VIA:

- (i) Langstrand, the beach to the north of Paternoster which stretches between first and second Mosselbank, is the main walking beach of inhabitants and visitors to Paternoster. It is the beach which international tourists often refer to as one of the best beaches in the world and is one of the most important tourist attractions in Paternoster. A viewshed analysis is therefore required from this beach especially in respect of the proposed turbines to the north of Kasteelberg.

- (ii) Par 6.8.1 includes a list of properties within a 5 km radius of the wind turbine structures which will experience a high visual impact. We own the following properties which are included in this list:
 - (a) Swartrug
 - (b) Portion 37/23
 - (c) Portion 36/23
 - (d) Farm 1050

Stand 1518 which borders the above properties and on which SOBH is built, should be added to this list.

Mr Du Plessis states that no mitigation is possible in respect of these properties.

Viewshed from these properties are required to evaluate the visual impact.

- (iii) Seemingly the author did not consider that in terms of the Saldanha Bay Spatial Development Framework two of these properties, Farm 1050 and Portion 37/23, had already been designated for the future extension of the town — see Annexure “A”. These areas front onto Langstrand and cover approximately 35 ha. They are being targeted for the development of tourism facilities which will have a connection to SOBH. When the question was raised at one of the recent public participation meeting in Paternoster, as to how these areas were treated in the VIA, the response was that only already developed areas were taken into account. Although it is acknowledged that an EIA still needs to be done for this area, this approach seems incorrect as it is highly likely that these areas will be developed. Some approvals in fact already exist and Farm 1050 had been re-zoned to “Resort 2”. A more realistic approach would be to allocate a realistic probability to the development of these areas which should then be taken into account in the VIA. Furthermore, an in principle agreement had been reached with Groot Paternoster



Nature Reserve (“GPNR”) that the remaining area between the northern border of the town on the SDF and GPNR as well as a part of Swartrug, will be re-wilded and consolidated into the GPNR. A number of glamping sites will be established on the re-wilded areas. It needs to be considered that these highly impacted areas will be populated by highly sensitive receptors who will especially be affected by the turbines to the North of Kasteelberg.

- (iv) The authors impact statement on page 91 states that the construction of the proposed BWF would have a high visual impact on the Kasteelberg Hill and proposed as mitigation that the wind turbines to the west of the Vredenburg-Stompneus Road be relocated to the east of this road. This mitigation had not been included in the current proposals. He also proposed that the reduction of the wind turbine size to match that of WC1, but this has also not been included.

He continues in his conclusion that if the Paternoster plateau and/or Kasteelberg had a formal environmental status it would have been considered a fatal flaw from a visual impact perspective.

I want to bring to his attention that the only reason why Kasteelberg had not been declared as a heritage site (grade II) is because the land owners refused to sign such a declaration. A conflict of interest also exists as one of the land owners (Kasteelberg straddles over two farms), is also a proponent of the BWF project. HWC indicated during a recent meeting that for purposes of the evaluation of the proposed BWF project that Kasteelberg should be treated as a heritage site despite the fact that the declaration could not have been completed when it was attempted in the past.

I also refer him to page V of the HIA where Ms Smuts states:

“The intrinsic value of both the cultural landscape and Kasteelberg is of unquestionable significance and not dependent on visual receptors.”

- (v) I also would like to bring to his attention the tourism node which is indicated on the Saldanha Bay Municipal SDF in Annexure A. This tourism node will include a hotel, restaurants, etc. It will therefore be populated by highly sensitive occupants.

- (vi) I also would like to bring the comment in 4.1 below to his attention.

3. Property Values, Tourism and Economic Issues Assessment Report by Urban-Econ (the “UE-report”)

The UE-report is flawed and does not provide a sensible analysis of the relevant issues.



One of the fundamental problems is the selection of the Key Respondents interviewed. The selection is not representative of the tourism market, eg:

- (i) The biggest section of the tourism market in Paternoster, holiday accommodation has more than 200 cottages for rental, but only a single cottage is selected in the interview sampling process.
- (ii) I contacted the largest manager of holiday accommodations, stay in Paternoster to find out whether they were in any way part of the sample. Although they are managing more than 100 cottages, they were not approached at all. Similarly, ourselves who have the No 1 rated Tripadvisor holiday accommodation property (La Baleine Beach House Collection – 10 cottages), the No 1 Tripadvisor restaurant (Leeto) and the leading hotel operation (Strandloper Ocean Boutique Hotel), were also not contacted.
- (iii) There are strong pointers as to the importance of international tourism for the town. It is in fact home to the best restaurant in the world in 2019 and of one of South Africa's most successful international hotels – refer Annexure B, par 9. This market is not analyzed at all.
- (iv) The flaw of selecting a non-representable sample showed up in par 2.3 with its conclusion “*Visitor numbers and revenues has decreased for the majority of the business interviewed*”. This shows some conflict with the statement in Par 4.1.1 that the Catering and Accommodation Services had grown by 93% over the past 5 years (Quantec 2017). This conflict was not looked into further. Our experience is totally different from their conclusion and our businesses showed growth of approximately 120% over the past 5 years. Stay in Paternoster indicated that the number of houses which they are managing also increased from around 60 to 100 over the past 5 years, an increase of more than 65%.

3.1 UE's assessment of potential wind farm effect on tourism and property values

- 3.1.1 Although UE states in the opening paragraph of their assessment that they would identify the factors that impact on the tourism trends historically, this was not done. Without identifying these factors and looking at any potential impact on them by the proposed project, it is not possible to determine how tourism in Paternoster can potentially be affected. Nevertheless in Par 2.3 they concluded

Considering that the location of the proposed BWF is inland and not expected to obstruct beach views for tourists visiting the coastal towns (ie Paternoster and St Helena Bay), the above-mentioned concern of obstructed beach views is likely unrealized and no potential negative on leisure tourism is expected.

This is a shocking oversimplification, basically reducing the impact on tourism to beach views. It falls short in so many respects that it is challenging to even critique specifically as it is so lacking in its entirety.

- (i) Firstly I would like to use our experience at Strandloper Ocean Boutique Hotel to explain how important the views over the Paternoster plateau are to tourists and that it is not only the beach views which matter: We have 2 types of suites at the hotel, namely Ocean Suites and



Nature Suites. The Ocean Suites are directly on the ocean and the Nature Suites overlook the Paternoster plateau. The rates for both suites are the same at around R8 000 per night during peak season December to April.

It is possible to compare the experience of guests staying in these suites through their reviews on booking.com. Booking.com is the most used tourism booking portal in South Africa and also one of the largest worldwide. It requests all guest who book through them to provide a review after their stay. We are able to access these reviews which are broken down into 7 components, one of them being “**Location**”.

As part of our last rate assessments, we reviewed this rating for the

previous 12 months period and the Ocean Suites had an average rating of 9.79/10 and the Nature suites 9.87/10. To put these ratings further in perspective, the only five star hotel in Cape Town which has a rating close to this is the Silo Hotel at 9.50 (followed by Cape Grace and the One and Only at 9.4);

(ii) As a second step I made a historical summary of the development of Paternoster’s tourism and property markets since it origins about 20 years ago – see Annexure A. This enabled me to identify the factors which most impacted tourism and property values over this period. The following ones will be negatively impacted by the proposed BWF project.

Crime: From the history it is clear that crime proved to be the achilles heel of tourism in Paternoster – see Annexure B, par 16. During the construction phase there will be a big influx of job-seekers the risk of crime increase. What is even more concerning is the impact on crime in the post-construction phase when unemployment will increase. What makes these risks even worse is that the reputational risk for a tourism destination takes many years to turn around (as we are experiencing in Paternoster at the moment). The influence of crime on property prices and tourism had therefore been overlooked and need to be considered further by UE. In order to quantify the financial impact of crime on property values, the following example in Paternoster is insightful: It deals with two stands, Stands 2043 and 2044 in Paternoster. These stands are next to each other and exactly the same size (227 m²). Stand 2044 had been sold in 2018 and Stand 2043 other only recently after a comprehensive security system was introduced in the area. The selling price of Stand 2044 was R550 000 and 2043 at a price 50% higher at R827 500.

International tourism Although there is the following reference to international visitors in par 2.2, the international tourism market is not analyzed at all:

*“Other have noted that some international visitors particularly commented that wind energy were good for energy security **but bad for the environment.**”* What does this statement mean? Ironically it indicates a negative impact on international tourism which UE strangely did not notice. Environment is a key determining factor in a guests’ decision where he/she will spend their holiday. If the perception is that the environment will worsen, a negative effect can be expected.

This issue therefore also needs further investigation by UE. Langstrand beach

As mentioned in 2 (i) above, Langstrand, the beach to the north of Paternoster is the main walking beach for inhabitants and visitors to Paternoster. It is the beach which international tourists often refer to as one of the best beaches in the world and is one of the most important tourism attractions in Paternoster. The proposed turbines to the north of Kasteelberg will directly come into the view of this beach.



Industrialization

Fishing and Tourism are the only economic activities in the town. Even retail is just for necessities and a few souvenir shops. There is a total lack of any industrial activity. A large commercial wind farm will change this. Although feelings towards windfarms are mixed, the net impact can only be negative as some tourists will be deterred, it is only the percentage which is uncertain.

The above therefore needs further investigation by a specialist.

3.2 Assessment of Economic impacts by Urban-Econ

From Paternoster's point of view it is essential to estimate what the expected economic return for the town will be and how does this weigh up against the economic and other risks?

This calculation should be provided by an appropriate specialist.

4.0 The Social Impact Assessment by Mr Tony Barbour

4.1 Wind is an abundant resource which can be harvested/"mined" in many places. WF's differ from conventional mines in that there are abundant locations suitable for the harvesting of wind. In this case a project is proposed in a sensitive position which compromises the environment. Mr Basfour state in this regard on page ii of the SIA:

*Of specific relevance the West Coast Districts Municipality SDF notes that wind farms should be located where they will cause least visual impact taking into consideration the viability of the project and located where their visual and environmental impact will be the lowest. **The Saldanha Bay SDF and IDP refer to the principles contained in the 2006 DEA&DP Regional Methodology document, specifically that large commercial WEF developments should be excluded from areas with high aesthetic landscape value.***

Mr Basfour concludes in respect of the above that:

These issues will need to be considered by the authorities when considering the application.

Surely it must have been possible to discuss this issue with the Saldanha Bay municipality before providing I&AP's with the SIA? This is very important information which should be provided to I&AP's.

4.2 During the Construction Phase the impact from influx of job seekers and the presence of construction workers are rated as Low (-). Whilst this may be the case for the other surrounding towns, this assessment should be re-evaluated for Paternoster considering that crime had been proven to be the achilles heel of tourism in Paternoster – see Annexure B Par 16. It has to be considered that the reputational risk for Paternoster to crime has a long term effect as it takes many years to change negative perception of tourists in respect of an important issue like crime.

4.3 On completion of the Construction Phase, employment opportunities will be greatly reduced. This will increase the exposure of Paternoster to crime again. The risks in 4.2 and 4.3 should be quantified and evaluated.

4.4 Paternoster made great strides to change its economy from fishing to tourism – see Annexure B. The proposed WF project is not labour-intensive and very few jobs will accrue to Paternoster's people. A very small part of the operation costs of the project will also flow into the Paternoster's economy. Despite this the Paternoster economy will be exposed to considerable risks. Overall Paternoster's economy therefore seems to benefit relatively



little but carries the biggest risk of all stakeholders. This position needs to be quantified for evaluation.

4.5 Socio-economic opportunities and benefits for historically disadvantaged, rural communities are used to motivate the project. Whilst this is welcomed, it needs to be put in perspective. Real difference come foremost from the creation of jobs. If jobs get lost and are compensated for by socio economic benefits, the overall impact will most likely be negative. There must be guarded against that communities are misled by promises of small amounts in order for investors to achieve their goals. In a few years the turbines may be turning and the investors will get their returns, but the local communities will have to live with the consequences. As is the case for 4.4, this needs to be quantified.

4.6 In respect of the impact on tourism the SIA concluded that there is limited evidence to suggest that the proposed BWF would impact on the area's tourism industry. If the EIA-preceding the WF project is done correctly, this should be the case but the Draft EIA is seriously lacking in this regard – see Par 3 above.

4.7 Impact on property values: the approach is again simplified. Most properties in Paternoster are used to earn tourism income. If this income reduces, the value of these properties will be reduced. The impact on property values in the case of Paternoster is therefore dependent on the impact on tourism. Once this is analysed, an estimate on the impact on property values should be done.

5.0 The Heritage Impact Assessment (the “HIA”)

I would like to bring the following to the attention of Ms Smuts, the author of the VIA:

- (i) My comments in respect of the VIA above;
- (ii) My comments respect of the UE report above and that the UE report seems fundamentally flawed;
- (iii) My comments respect of the SIA above;

On page VII she confirms that the impacts to the cultural landscape are unmitigable except by removal of the turbines from the landscape. She however seems to assume that the value of the socio-economic benefits exceeds the damage to the cultural landscape by such a margin that the project should still be considered. I could not find a valuation of the socio-economic benefits in order to evaluate this assumption and requires this valuation

Kleynhans, Andre

From: Andre [<mailto:paternoster@absamail.co.za>]

Sent: Monday, 01 July 2019 17:21

To: Louise Van Aardt <info@cesnet.co.za>

Subject:

Goeie middag,

Ek is die eienaar van verskillende eindomme in Paternoster, in die naam van my Trust, ANKER TRUST IT 1381/2004, geregistreer.



Ek bly al 31 jaar in Paternoster en dit is ONDENKBAAR, om teen so 'n kosbare stukkie van ons erfenis, 'n Windplaas te bou. Hoewel nie een van ons hier teen groen energie is nie, kan ons nie toelaat dat die laaste Vissersdorpie aan ons kus, met 'n Windplaas besoedel word nie.

Ek is dus heeltemaal daarteen gekant en hoewel ek male sonder tal al vele beloftes gehoor het, wat NOOIT nagekom is nie en ook weet dat u Publieke deelname as net nog 'n blokkie"tick", u verseker kan wees dat die stof nie sal gaan staan oor hierdie een nie.

Ek het egter vir u 'n alternatief in die posisie van die Windplaas en my deur staan oop om dit te bespreek.

Vriendelike groete,

Andre Kleynhans,

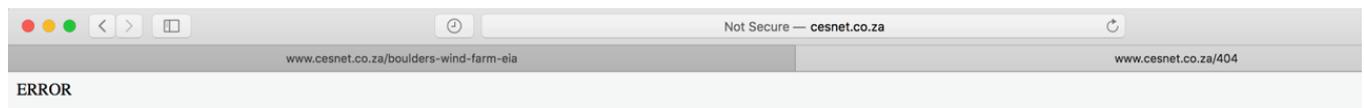


Pickford, Peter

From: Peter Pickford [<mailto:pbpickford@gmail.com>]
Sent: Thursday, 23 May 2019 12:41
To: Louise Van Aardt <info@cesnet.co.za>
Cc: Gustav Bester <gustav@bexgroup.co.za>; Deon Brand <deonbrand@yahoo.com>; Alvin Roon <alvin.roon@gmail.com>; Mary Ralphs Britannica Heights <maryralphs@mweb.co.za>; Lunga Dlova <LDlova@environment.gov.za>; Andre Van Der Spuy <avdspuy@iafrica.com>; Limpho Makotoko <lmakotoko@environment.gov.za>; sl.cyrus@outlook.com
Subject: Re: Boulders Windfarm PPP Advert

Dear Ms Talbot, Mr Johnson,

In downloading the 1st Draft of the EIA documents for the proposed Boulders Wind Energy facility, I note with concern that Appendix D3 the Bat Impact Assessment does not load and instead one is presented with the following error message:



I have received notice of the same malfunction from other I&APs prior to today.



It becomes incumbent on CES therefore to repair the malfunction and to begin the public participation process again from the date on which such malfunction is repaired.

The public cannot comment on documents that are not available.

I look forward to your response.

Kind regards,

PETER PICKFORD

www.wildlandphoto.com

www.pickfordwildlifephotography.com



T: [+27 0\)827629219](tel:+270827629219)

E: pbpickford@gmail.com

P.O. Box 1311 Vredenburg 7380 South Africa



Please consider the environment before printing this email

From: Peter Pickford <pbpickford@gmail.com>

Sent: Tuesday, 28 May 2019 09:04

To: Maura Talbot <m.talbot@cesnet.co.za>

Cc: Ralphs <maryralphs@mweb.co.za>; Deon Brand <deonbrand@yahoo.com>; Alvin Roon <alvin.roon@gmail.com>; Andre Van Der Spuy <avdspuy@iafrica.com>; Johnny Copeland <jc@hci.co.za>; Richard Butt <butt@iafrica.com>; Chris Sivertsen <cpsivertsen@gmail.com>; NoWindfarmsPaternoster <nowindfarmspaternoster@gmail.com>

Subject: Re: Boulders Wind Farm EIA - extension of PPP period.

Dear Maura,

Thank you for your email.



Your comment and the extension of the public review period is noted and appreciated, thank you.

I confirm that you shall confirm this extension to all I&APs.

Kind regards,
PETER

www.wildlandphoto.com
www.pickfordwildlifephotography.com

PLEASE VIEW OUR RECENT VIDEO ON LIVING CONSCIOUSLY:

<https://www.youtube.com/watch?v=UxHWzP6frTs&t=9s>



T: [+27 0\)827629219](tel:+270827629219)
E: pbpickford@gmail.com
P.O. Box 1311 Vredenburg 7380 South Africa



Please consider the environment before printing this email

From: Peter Pickford <pbpickford@gmail.com>
Sent: Wednesday, 29 May 2019 11:14
To: Maura Talbot <m.talbot@cesnet.co.za>
Cc: Gustav Bester <gustav@bexgroup.co.za>
Subject: proposed Boulders Wind Farm Avifauna report

Dear Maura,

I note that the avifauna report by BioInsight for the proposed Boulders Wind Farm makes mention of a radar report. Such radar report does not appear to be attached to any of the reports or be submitted as an independent report. Please can I ask for a copy of the said radar report as it bears on the avifauna impact of the proposed Boulders Wind Farm and as a consideration of the conclusions in the BioInsight report it is most relevant.

I would further note that this same report was mentioned by Ms Karen Jodas of Savannah Environmental as the then EAP during the public meeting at Paternoster where I asked for a



copy of the said report. I note that I never received this and did mention such lack of receipt in my comments on the scoping report.

I trust that you will be able to amend the omission.

Kind regards,

PETER

www.wildlandphoto.com

www.pickfordwildlifephotography.com

PLEASE VIEW OUR RECENT VIDEO ON LIVING CONSCIOUSLY:

<https://www.youtube.com/watch?v=UxHWzP6frTs&t=9s>

T: +27 0)827629219

E: pbpickford@gmail.com

P.O. Box 1311 Vredenburg 7380 South Africa



Please consider the environment before printing this email

Wilkinson, Ian

From: Ian Wilkinson <ian@sothebysrealty.co.za>

Sent: Tuesday, 18 June 2019 18:25

To: Maura Talbot <m.talbot@cesnet.co.za>

Subject: Windfarm - Paternoster



Lew Geffen | Sotheby's
INTERNATIONAL REALTY

Explore Homes ▶



Hi

Great presentation today. I am firmly behind the development as presented.

For your info – there is likely to be strong opposition from various sources.

One of the spokesmen for one of these sources recently asked me (as Principal of an Estate agency in the area – Paternoster and St Helens bay) for comment.

My view is :

- The feeling of our prospective buyers is neutral – some for, some against.
- Tracking property values since the implementation of Westcoast 1 – no negative effect on property values . Values have increased – but I cannot ascribe that to the windfarm.
- We also have an office in Hopefield – and have had no negative comment.

I hope you have a successful visit in Paternoster.

Kind regards

Ian

Ian Wilkinson

17 Voortrekker Road, Vredenburg,

Office: (022) 713 2858

Fax: 086 671 0488

Mobile: 083 289 4848

Email: ian@sothebysrealty.co.za

Web: www.sothebysrealty.co.za