

**FINAL ENVIRONMENTAL IMPACT ASSESSMENT
REPORT**

Boulders Wind Farm

Vol. 4

APPENDIX F-3

**Proofs of submissions received
from I&APs from Britannica
Heights, St Helena Bay and the
Petitions**

September 2019





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PROOFS OF SUBMISSIONS RECEIVED FROM I&APs

Britannica Heights Residents



Marx, Matthew

Boulder's Wind Farm EIR: Feedback from IAP

2 July 2019

IAP name: Matthew Marx

Address: Britannica Heights

Preamble

The residents of Britannica Heights are not unacquainted with the EIA process and those who manage it. This is the third resurrection of the EIA for the above project. While the previous two EIA practitioners manifested all the usual tactics for avoiding questions, diminishing concerns, sprouting mantras and so on, CES has proven unique in not attempting to disguise their contempt for any IAP's who don't fall into line with the aspirations of their paymasters.

The degree to which the EIR is loaded in favour of the developer's objectives is quite unprecedented for us. The level of bias and distortion, conscious or otherwise, in order to produce a favourable outcome for the developer is alarming - especially for professional practitioners who have signed a commitment to neutrality.

This attitude was also reflected in the cavalier, box-ticking approach adopted for the IAP engagement meetings. The IAP's were left with the clear impression that their valid concerns, both locally and in the bigger picture, were of no importance and that they are really small-fry in a big world. They're probably right on the second point. Nonetheless, the degree to which they have sacrificed their authentic role as protectors of the environment needs to be made very clear to them. Likewise, the degree to which they are comfortable with the meaningless double-speak that economists have subtly introduced into their work needs to be pointed out.

Herewith some points that should be reflected upon:

- Nothing we human beings do to meet our insatiable demand for energy and "stuff" works in harmony or balance with the environment. There might be a few surviving hunter-gatherers in the Amazon who wisely refuse to partake of our system, but that's it.
- Everything we do to acquire our needs causes harm to the environment, to a greater or lesser degree. This is especially true of the relatively affluent, but unfortunately also true of the less affluent.
- We largely all aspire to a lifestyle which is more affluent and increases the burden on the biosphere. Witness the rise of China, where per capita differences in impact with the greedy West are rapidly diminishing.
- "Sustainable growth" and "sustainable development" are meaningless oxymorons. You can't have endless growth (in population or per capita demand) in a finite biosphere. Period. But Oooh the politicians, economists and EIA practitioners love this one!
- The wild spaces in the biosphere, together with their enormous diversity, provided the arena in which life appeared and thrived. Only wild space growth within nature's constraints enhances the health of the biosphere.

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- Human intervention in all its forms inevitably destroys wild spaces and hence the health and resilience of the biosphere. This includes the burning of fossil fuels and the commandeering of vast swathes of land for renewable energy forms.

We humans are not good at accepting sobering truths that threaten our "rights", enjoyment of affluence and aspirations to affluence. We're even worse when those threats are predicted to roll out over decades rather than days or months.

The EIA process was conceived to give the environment a voice through the EIA practitioner. As such the EIA practitioner is right not to be a neutral party. They should be shouting for the environment. The IAP's will generally shout to defend against threats to their personal experience of life, asset values and speak for a few favourite animals. The developer blunders forward towards realising a profit for his shareholders. Who really speaks for the environment?

The EIA practitioner's capacity to provide that crucial voice is compromised in several ways:

- They have to survive in the current environmentally destructive economic model
- The developer is assigned to be their paymaster
- If they don't meet the developers aspirations, they will be replaced - as has been done twice in this particular wind farm application
- If they become known for stopping new developments in their tracks, or even curtailing part of the development, no developer will approach them for their services
- Their stance is subject to human pressures for job creation, poverty alleviation and so on. This in a legislated framework which still favours distributing the larger percentage of returns on fewer individuals.

In view of these constraints, it is hard to imagine that the EIA process can do more than slow down or temporarily delay any new development. The wild places will inevitably be degraded, the human cancer will continue to thrive. When a place is partially degraded by some development, it becomes much easier to push the next one through. The process in effect feeds itself. Once the local valley is full of wind turbines, who will bother to stand in the way of mining or heavy industry for example. The valley will be dead and the existing EIA process can do little other than tick the boxes towards its demise.

On a lighter note, one can respond to CES' dismissive attitude towards the local IAP's by becoming enraged. I have elected to bury my rage and respond to you by making use of satire - both to illustrate how your major dominant members come across and what we might conclude about your attitude to our concerns. Enjoy and feel free to poke fun at us in return. We can all learn something from satire.

So without further ado:

CES Cast of Characters:

1. "The Reasonable Man"

Every EIA group has one. The leader. The sensible, fatherly presence who overlays the fraught, tempestuous public engagement process with the lubricating oils of mature, reflective "reasonableness". He represents the only "neutral" figure in the drama, a facilitative conduit between the raging IAP's on the one side and the members of his team who fight for the cause of their Paymaster on the other. He diffuses tense situations by encouraging the moaners to commit their concerns to paper: "Please, please do so - that we may tick the right boxes and get this tedious "requirement" out the way. We don't intend to waste any time giving you meaningful feedback at this face-to-face meeting or, for that



matter in the final EIA report, (particularly for those awkward questions!), so we simply employ deflection techniques to gently show you how irrelevant you all are in the big picture".

2. "The Drama Queen"

The IAP's have been through several EIA teams on this project. CES is the first to include this thespian master of eye-rolling, huffing, puffing and desperate facial contortions to demonstrate in no uncertain terms how monumentally stupid this motley collection of rustics are. That incomprehensible French fellow, with a PhD in electrical engineering, rabbiting on about "infrasound" ("he's from Barcelona" as the nice English-woman helpfully put forward). Or that grim-faced woman who worried about "shadow-flicker", when everybody knows that at this location the sun is never behind the proposed site. Or that obnoxious, bald-headed twit who presumed to challenge the Paymaster's clearly unbiased comments on wind-power economics.

How did it get to this? Part of a team of once bright-eyed worshipers of the wild places. Now facilitating the roll-out of the vast behemoths of humankind's technological dream into what remains of these spaces. Evaluating the fate of the local fauna and flora, not in terms of the majesty of their individual being, but as statistics. To feel ok about whacking them out of the sky if they have not yet been classified as "red-listed". Perhaps feeling some pang of despair if they are endangered. But immediately feeling better again at the thought that their flight paths will probably not lie in the 55-120 m height range of the vicious turbine blades - as suggested by the armchair specialist. God help those flying at 56 or 57 meters! But we will put in some traffic signs to guide them and, with great relief, condone the impact ranking from shockingly High to comfortably Numb.

As for the bats? We'll get somebody to count the carcasses every day and add the numbers to our statistical data base to *inform* the next wind farm project - those that haven't of course been spirited away by the wind farm company before the counting begins. We'll also investigate frightening them out of the general area by blasting them 24/7 with the bat equivalent of heavy metal. After a few months of this, we feel sure that the carcass count will show negligible fatalities. Those cynical IAP's will probably suggest that this follows from there being no more bats in the area - stupid bumpkins!

3. "The Turbine Junky"

There was always going to be one. The odd bird, who, from years of familiarity, has gone and done it. Fallen in love with a wind turbine. In fact two wind turbines. Moderately tall, graceful structures that peep alluringly at him every morning from behind the local petrol station near his holiday home in old Blighty. With an almost indecent sense of pleasure, he gazes longingly back in return - so close, but so unreachably far! The passionate, unrequitable tension is hardly bearable.

What's to be done? Go evangelical of course! How can you IAP's be so blind to the beauty of these sensual machines? You lucky, lucky bastards! I've got to settle for two little tadgers back home - and here you have the promise of 45 soaring 165 meter high beauties to choose from! On your doorstep no less! Add to that 47 existing temptresses already close to you - not short themselves at 125 meters - and you're complaining!?

4. "The Paymaster"

The icy winds cut south from the gun-metal-grey of the Baltic sea on Germany's northern coastline. The tall, imposing figure of the Paymaster paces gloomily before the heaving waters. He glares balefully at the off-shore wind turbines, part of the wind energy system that



meets 20% of Denmark's energy needs. Damned Danes! Clever idea that in hindsight. We in Germany decided go onshore - extending our few remaining natural forests with forests of giant wind turbines. Penetrating and submerging our ancient fields, meadows and vales with wind turbines. Now there are rumblings from the people. Kickback they call it. Those same once silent places are where Beethoven walked, drawing inspiration for his glorious symphonies. What cacophony would he have produced if he had emerged after many hours, head spinning, from a vast array of monotonous wind turbines?

The people are beginning to know this. In fact the Paymaster is beginning to know this. The need to go global has been evident for years. We in Europe will never meet our vast energy needs from renewables - our population is far too large and the available land area far too small for "country-sized" installations. That damned late David McKay! His book showed clearly the implications for the UK going totally renewable. And as for that decrepit Father of Gaia theory, James Lovelock! He was supposed to be a Greeny and here he is croaking out his hatred of wind turbines (wind-mills he calls them) and advocating nuclear power. Nuclear power! After Fukushima?! We shut all ours down after that event. Now we have to burn dirty lignite coal to make up and run every now and then to France for some of their nuclear power. Horrors! Despite all our well-meaning efforts, our carbon emissions are still going up!

But Africa. South America. Mmmm. Vast land area, relatively small populations. But generally poor. The Paymaster likes the poor. They are desperate enough to believe any positive spin placed on any new development. Although we had better hurry up and get a foot in the door. Even the poor are becoming cynical, what with repeated promises that never materialise. South Africa's West Coast looks particularly good. But those damned Danes got there first! And what a killing they made. An enormous R3.3 billion rand for 47 relatively puny 125 meter turbines - just a few years ago; nameplate capacity of only 94 MW. Peanuts.

What's worse is that the Danes got the only spot on the West Coast where the wind blows. It's in a rather pleasant section of mixed agricultural and wild land, a few low hills, some signs habitation by ancient cultures and pleasingly close to the sea. The Danes have grabbed the best spot, on a high point before the land sweeps through a valley towards the sea. We will have to build into the valley. Unheard of for wind farms - and partly downwind of the existing wind farm for much of the year. We have nonetheless measured the wind speeds with our masts and we can still make a good profit here. We haven't bothered to measure the wind speed anywhere else, from which it may be concluded that the wind doesn't blow anywhere else. We are really obsessed with burying what's left of this particular valley under giant wind turbines and flatly refuse to consider alternative sites - regardless of the requirement of the local legislation to do so.

The locals in the area keep asking why we are so stuck on this spot. I don't know myself to be honest, and if I did know, those troublesome IAP's would be the last to be informed - especially that collection of yahoo's from Britannica Heights. The government wind map shows vast areas available to us. We foolishly admitted to the IAP's in a previous meeting under the auspices of Savannah that the power transmission cost is a very small fraction of the total project cost - so we do have great flexibility to look elsewhere.

Our own calculations of cost look rather surprising. Where the existing wind farm invested R3.3 billion for 47 x 2 MW turbines, we are managing to invest R1.52 billion for 45 x 3.1 MW turbines. Enormous beasts that dwarf the local mountains! How do we do it? So much less investment for so much more hardware. Again, I'm not sure - but we'll think up something. It's little wonder we can claim that wind power is so cheap. Of course we ignore that fact that it leans heavily on coal, gas, hydro, nuclear in the grid to ensure reliability of supply. We dare not factor in that cost or the cost of huge battery banks which will be required to even begin a cost comparison with the competitors. Just assure the dim locals that their electricity will get cheaper!



33% of our surprisingly low investment gets spent in South Africa. In order to keep the country's GINI coefficient nice and high, a few percent of the returns go to the local black community for social / economic upliftment (several thousand indigent people in the area). A few more percent goes to local shareholders from the black communities (far fewer people). A whopping 21% goes to BEE consortiums (a relative handful of lucky people). And 67% goes back to Germany. Under COP 21, rich first-world countries were encouraged to offset their emissions by investment in third world countries, without the expectation of vast profits. The Paymaster presumably knows this. In fairness to him, this extraordinarily skewed distribution of profits is actually set by local legislation. We've clearly misunderstood all along. Money flush Africa should be honoured to donate something to spin all those impoverished Europeans out of their cycle of poverty.

But we will create jobs! About 20 permanent jobs at a cost of about R78 million per job. Wow! Better keep that figure under wraps. But don't let us stop the facts from allowing us to trumpet the extraordinary job-creating capacity of wind farms and renewable energy in general.

We had better downplay the benefits for the local farmers. Two farmers receiving a monthly stipend for each turbine on their property. We must remain cagey about the magnitude of the stipend, but these irritating locals are throwing around numbers of about R10 000 to R20 000 per turbine per month. One of the farmers hosts 31 turbines, the other 14. What a return! Millions of rand per annum without investing a cent.

The Paymaster turns his face away from the wind. No! The project must continue. We will proceed as we have during all the years we have been bullying the project through this tedious EIA process. We've already fired two EIA companies. Hopefully CES will come to the party. Just to make sure, I'll re-enforce their neutrality by being present at all their public engagements - just to make sure we're on the same page!

5. The Visionary

This poor soul is burdened with one of the most glaring impacts of the wind farm. The LOGIS chap had a good bash at the visual impact study. For some reason, CES seems to have repeated the study, using the skills of the rather youthful, but capable Mr Johnson and rubber-stamped by a PhD of plant science / accountant - huh?

Both studies seem to rely on some procedure which attempts to quantify or assign a "ranking" to the unquantifiable. Visual impact can be very simply assessed by considering the following parameters:

- To what degree does the imposed structure differ from the arena in which it will be placed?
- How does the size of the installation compare with the size of the dominant features / terrain of the arena?

The proposed wind farm's visual impact is staggeringly high on both counts. It doesn't "take-off" from anything in its local environment. A vast army of glaringly white towers, 120 m high, each supporting a huge 103 m rotor - which happens to be moving for part of its life. Taller than the local hills and ridges! Flashing lights at night.

And the local arena? Low level scrubland, farm land, very small pockets of rural settlement and a few low hills and ridges. Anything in common? Nothing at all.

The main EIR blatantly diminishes the impact of the wind farm by greatly inflating the distance of Britannica Heights (part of St Helena Bay for those who don't know) from the wind farm. The nearest turbine is about 3.9 km from Britannica Heights. The "7 km" given in the text puts St Helena Bay about 1 km into the sea. Nothing like a bit of number massaging.



The main EIR also downplays the scale of the wind farm. Limiting the calculation of the size of the installation to the sum of the areas of equipment footprints and roadways ignores the massive area and volume *spanned* by the installation. The road areas and turbine foundation areas contribute little to the visual impact. The spanned area and spanned volume are what matter. The spanned area of the installation is above 800 ha, while the spanned volume is about 1.5 km³. Compare that to the 24 ha given in the report. The volumetric span isn't even mentioned. For comparison, Tesla's gargantuan Gigafactories have a footprint of about 100 ha and are one to two stories high. Small fry! Would anybody seriously propose putting a gigafactory in the valley? Lord forbid!

And finally, there are the visual simulations of the installation from various view points. The most visually affected area is unquestionably Britannica Height. The valley towards Paternoster is the main view and from its elevated perch - about 160 m above sea level - the most breathtaking view. This was made very clear to the CES folks who met up with IAP's on the hill during June 2019. What was also made clear was the stark visibility of the existing West Coast One wind turbines.

The LOGIS study made some attempt to simulate the future view by superimposing the new turbines on a landscape view clearly taken with a camera. Anybody who has used a camera to try and capture the majesty of a big, red sun at sunset or a big, white moon at moonrise, will know the disappointment that follows the discovery that cameras are not good at capturing the scale of distant objects. They don't see vistas like the human eye. The LOGIS images fail on three counts:

- The exaggerated diminishing of distant objects in the image
- The image was taken from immediately behind one of the local houses. Cameras greatly exaggerate the size of nearby objects. Thus we have a huge house in the foreground, making the wind turbines look very small.
- The horizon behind the wind farm happened to be hazy and white, masking the white turbine blades in the image.

The CES simulation was almost comically bad. It would be comical if it wasn't so shocking at biasing this major impact out of the picture as it were. The terrain looks bizarre, as if CES didn't even bother to take his photograph from the site, but rather employed a "stand-up" view from google.maps. The location doesn't even resemble the local terrain, with the hills and ridges smoothed out and the foreground presenting as a blur of God-knows-what. The "before" shot of West Coast One shows turbines that are barely perceptible without the use of a magnifying glass. Pleasingly for the Paymaster, the new giants are also not obviously present.

But everybody at the June 2019 meeting with CES agreed on one thing - the view of West Coast One in the studies bore no remote resemblance in scale to what they could actually see from site. If just one example of outrageous bias could fatally flaw this EIA, this would be it.

Jordaan, Deborah

From: Debora Jordaan <debora.jordaan@gmail.com>
Sent: Thursday, 16 May 2019 12:44 PM
To: Michael Johnson <m.johnson@cesnet.co.za>; Maura Talbot <m.talbot@cesnet.co.za>; Samuel Smit <samuel.smit72@gmail.com>; Wally Jordaan <jordaan.business@gmail.com>
Subject: Important: Boulders Windfarm PPP Advert



Good day Michael & Mara

Thank you for your mail below.

I hereby strongly object against the proposed Boulders Wind Farm.

1. Me and my family are property owners and permanent resident in Britannica Heights which is right next to one of the proposed sites namely Davids Fontyn 18 portion 7/18 - I mean the proposed wind turbines **will be next to our back yards.**
2. The proposed towers will be much much taller then the existing farm and be much much closer to our residential homes negatively impacting our property values, our health, our sleep etc. not to mention the blade noise levels during the night and the detrimental effect it will have on our general health and way of life.
3. Re the Boulders Wind Farm Final Scoping Report Appendix A, Page 27 Par 2.4.1; There should be another bullet as a site selection Driver namely:
>> NOT right next to a residential community's homes.

We do get the facts regarding alternative power solutions, job creation, availability of wind and connection stations etc etc BUT why can't it be further away from our residential properties - NO wind farm should be done on Davids Fontein 18 (both portions) or Schuitjes Klip 22 portion 1/22. We as property owners and residents have to defend our rights against these wind farm developers on a regular basis and it is starting to feel like harassment. This close to our homes should be a permanent NO.

Regards

Debora Jordaan

Affected party & resident Britannica Heights, St Helena Bay

From: Debora Jordaan <debora.jordaan@gmail.com>

Sent: Tuesday, 28 May 2019 17:33

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

Cc: samuel.smit72@gmail.com; Michael Johnson <m.johnson@cesnet.co.za>

Subject: Re: BWF - acknowledgement of receipt

Hi Maura

Thank you. Please also ad Samuel Smit (copied in on the mail) as an affected party and owner of property in Britannica Heights Smallholdings St Helena Bay.

I take note of what you say regarding the proposed farm areas. If so, then I don't understand the scope doc which forms the basis of the application. To get the correct facts, **can you therefore send us a map (1 page document please) of the properties/areas/farms that are now indeed part of and proposed to be suitable and included in the wind farm's proposed site plan?**

Regards

Debora

From: Debora Jordaan <debora.jordaan@gmail.com>

Sent: Wednesday, 29 May 2019 13:16



To: Maura Talbot <m.talbot@cesnet.co.za>
Cc: samuel.smit72@gmail.com
Subject: Re: BWF - acknowledgement of receipt

Hi Maura

Thank you for directing me to the maps.

I made a copy of the map and indicated with a Red Circle the proposed wind farm areas that are too close to Britannica Heights Smallholdings - a large residential area in St Helena Bay. See picture attached.

Wind towers so close to our homes will negatively impact our sleep, health, peace & quiet, views and property values. This is not what we signed up for when we bought out properties as far back as 2011.

These proposed monsters will be much taller than the ones already in operation today. We strongly object against it.

Regards
Debora



Morley Robert

From: Robert Morley <robert.morley@pamgolding.co.za>
Sent: Tuesday, 11 June 2019 11:18
To: Louise Van Aardt <info@cesnet.co.za>
Cc: Michael Johnson <m.johnson@cesnet.co.za>; Maura Talbot <m.talbot@cesnet.co.za>
Subject: Proposed Boulders Wind Energy Facility, Western Cape Province



Dear Sirs

With regards to above proposed Boulders Wind Energy Facility I wish to register as an interested/affected party.

In addition, I strongly object to this proposal for the following primary reasons:

1. The proposal represents gross visual pollution in terms of its location in the heart of a popular tourism hotspot as well as a pristine unspoiled natural area.
2. The proposal will lead to noise pollution, vibrations and consequent interference with natural birdlife and migratory paths.
3. There are more than sufficient alternative areas on the West Coast for such proposed installations, where no established and existing development/infrastructure will be adversely affected by introducing new wind energy developments
4. The “polluting” effect of the proposed wind farm activities will seriously affect tourism development in the greater St Helena Bay area as investors in property in this area are those seeking an unspoiled natural environment

Yours faithfully

Robert Morley

232 Golden Mile Boulevard

Britannia Bay

St Helena Bay

Tel: 082 4140604

Email: robert.morley@pamgolding.co.za

Anne and John Todd

25 June 2019:

COMMENTS DEA project reference number (14/12/16/3/3/2/1057)

The resident all support and are in favour renewable energy, but the siting of this facility is not acceptable!

We feel the following points need **SERIOUS** consideration:

1. Residents in this area do not want a WEF farm which will be seen from the local towns and for many kilometres around. (From the initial EIA, an area of at least 4500 sq.km.) Why is this the only site being considered and no alternative sites investigated?



2. The visual impact, especially for the properties on Britannica Heights which will have the WEF in their front yards.
3. The possible/certain drop in the value of properties especially on Britannica Heights where the WEF will be in their front yards and faces 24/7. Even if your expert does not even mention the suburb.
4. The noise factor, especially downwind from the predominant SE winds i.e. St Helena Bay and surrounding suburbs.
5. The proposed WEF is on the flight line for birds from the IBA's at Velddrift and Langebaan Lagoon. Not only will the WEF impact, but also the associated infrastructure – HV Lines, substations, roads, etc - will impact on flight lines and habitat. This has already been the case with bird fatalities from WC1.
6. The tourism will be affected as the often used gravel road between St Helena Bay and Paternoster will lie between the turbines, and they will be visible from the popular dune tourist road between Paternoster and Duiker Eiland. To state that the turbines are aesthetically pleasing and will be a tourist attraction is absurd. Foreign tourists are going to visit the RSA to view windfarms when they probably have more than enough to view in their own country?
7. The gravel road used by many between St Helena Bay and Vredenburg will not take all the extra heavy vehicles – especially during construction - and will become dangerous from heavy traffic and surface condition. **This road is already frequently in a bad condition with ruts and corrugations and is not graded as often as necessary. In the rainy season, certain sections of the road are extremely muddy as the road is lower than the surrounding ground level and has no drainage.**
8. While West Coast Biosphere Reserve, SANParks, West Coast DM, West Coast Way, AWOAHR and others are trying to promote tourism on the West Coast thus preserving and creating jobs, Vredenberg WEF's and others are trying to destroy tourism with a project that will create minimal jobs.
9. The crime and disease rate will probably/definitely increase, especially during the construction phase.
10. The 1:10 00 orthophoto - 3217DB25 gives the highest point on Britannica heights as 164 m ASL this means that at 165m high, the turbines, even if placed at sea level, will be higher than this point, but when place on the highest ridges, as with WC1 will tower high above all surrounding areas. Are they not the height of two rugby fields end to end?
11. "As part of the Feasibility Assessment undertaken by the project developer, the developer engaged with numerous stakeholders to obtain a sense from key entities regarding the acceptability of the proposed wind farm facility on the planned site. In response, letters supporting the development were received from", CES then lists many stakeholders who are in favour of the project, **BUT not one who is opposed to it.** Is this because the developer never engaged with those in opposition, considers them not key entities worthy of obtaining a sense regarding the acceptability, or that the developer & CES are ignoring their concerns and are just trying to bulldoze the project through.

We look forward to your reply & thank you in anticipation & in hope of a reply.

Kind regards

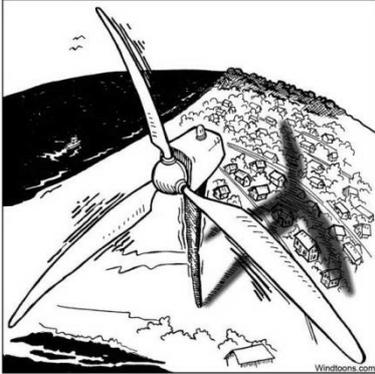
Anne & John Todd



1 July 2019:

COMMENTS **DEA project reference number (14/12/16/3/3/2/1057)** **Proposed Boulders Wind Farm**

The future of the West Coast Peninsula!



- 1 Can CES please clarify whether the seven turbines (15, 19, 21, 27, 31 ,33 , 43) moved from West to East were as a result of the Kasteelberg Heritage site, OR so as to not cause conflict when CES's other project for the proposed mine prospecting gets underway.
- 2 Although the seven turbines have been moved Eastwards "to avoid impacting on Kasteelberg", they have now been moved further into the faces of Britannica Heights residents, especially those one Km further East from where the CES presentation took place and which no one from CES has visited.
- 3 Why are the operational monitoring results from WC1 not available for bird and bat impacts to allow for mitigating measures to be put in place during the construction phase instead of waiting for the deaths of these creatures to be observed during the operational stage at BWF before mitigating measures are put in place?
- 4 Why are the Radar monitoring results not available to I&AP's, is there something that needs to be hidden? Surely **ALL** monitoring results should be available to **ALL** people to allow them to form an unbiased, objective opinion of the project!
- 5 Why are all I&AP's not notified re presentations or meetings, but one member in a community is notified and requested to contact others? Is this notification not the duty of the EAP and is notifying **ALL** I&AP's not set out in the regulations?
- 6 Why in the meeting with DEA re the complaint of bias were only four I&AP's – all Ward committee members - interviewed out of the many registered I&AP's and this considered to be a random selection of all affected people? It has also come to light that originally only three were "invited" by DEA and the fourth only invited after intervention by SBM. Is this considered to be an objective review of the bias complaint, and does DEA's action not hint at bias on their part?
- 7 CES states that alternative sites were considered, and rejected as they were in NO-GO areas. Are these sites in the Langebaan Road AFB exclusion area, and if so were they taken over from Savannah who considered them before the AFB exclusion area was known? If this is so, why did CES consider these same sites if it was known they were in the exclusion area and not investigate other alternative sites, or



were they just taken over irrespective, to just tick the box for alternate sites, and no other sites considered? Can CES please advise which other sites were considered.

- 8 One of the big plusses that CES puts forward is job creation. What percentage of the WT components are manufactured in RSA, or are we as tax payers creating jobs in Germany? This project will cause MANY outsiders to flood into the area seeking work, and then if they do not get work or when the work is completed they will most likely, as has happened in the past, remain in the area and not return to their original areas. This will increase the crime rate and also the pressure on SBM infrastructure with the demand for housing and services which will lead to riots when not provided, as has already happened. What guarantee do long time local residents have that they will be considered for jobs before incomers?
- 9 From the Google Earth map provided it is seen that many turbines are placed on the edge of No-go areas which means that the rotor, with a diameter of 103m, will encroach 51,5m into the No-go areas. Is a No-go area not a No-go area for **ALL** wind turbine components, access roads, power lines, etc? Also number 16 is placed in an enclosed area roughly 115m x 50m and number 17 in an area roughly 170m x 50m this means they are going to encroach heavily on No-go areas, and how will access roads be constructed and construction performed without encroaching on the No-go areas?
- 10 Obviously none of the negative effects of the BWF will concern the developers (Enercon, EnergieQuelle, and Saertex) – they will be in another country taking their profits out of RSA, or CES they will be in other parts of RSA unaffected by the negative effects of the BWF – the farmers – they will be extremely well compensated which will make negative effects immaterial to them. So it is only local residents and tourists who will have to live with the “temporary” negatives for twenty five years.
- 11 Are the developers in RSA because they wish to benefit the country and its people, or because there is too much opposition to WF’s in their own country, and it is easier to make money and take it home from here? From what we read electricity in France using Nuclear power is half the cost it is in Germany, which cost has risen by a reported 50% since wind and solar were introduced in 2006.





- 12 As brought up at the Britannica Heights presentation no consideration is given to the ill effects of Low Frequency Infra Sound. Why is this not given attention? Ronald Bach states “There is no scientific evidence that infrasound below human perception levels has any impact on human health” Is there any scientific evidence that infrasound below human perception levels has NO impact on human health? He then gives studies that are obviously going to back up his theory. Did Enercon recently not have to admit in open court that their wind turbines damage the health of nearby residents in Ireland? There are however other studies that dispute his statement, why does he not quote from these? **“The pilot study carried out in Satakunta and Northern Ostrobothnia in Finland shows that the damage caused by infrasound from wind power plants will only decrease significantly more than 15 kilometers away from wind turbines. The study was carried out by the Finnish Association for Environmental Health (SYTe) in the spring 2016.”** or “Wind Turbines and Proximity to Homes, the Impact of Wind Turbine Noise on Health by B J Frey & P J Hadden”, has he even bothered to read these? Obviously the ill effects of IS is a new problem and needs much more research with the latest technology, so why must residents be the guinea pigs before proper research is done?
- 13 CES states the BWF will provide “Security of electricity supply, where over the last few years, South Africa has been adversely impacted by interruptions in the supply of electricity”, has a reliable means of storing the electricity been developed for the many times when there is NO wind? From some reports WF’s are only productive 30% of the time on average. This means a reliable backup system will be necessary, which has to be maintained and operated when necessary; this needs to be added to the cost/kWh of that produced by wind, as must all the other costs applied before the electricity reaches the consumer – line fees; substation building, operation and maintenance costs; plus all the other costs ESKOM adds. This will greatly increase the cost to the consumer compared to what CES gives as the price from the developers.
- 14 How will the WT components be disposed of at the end of their life cycle, how much can be recycled or will they contribute to the ever growing problem of waste and destruction of the environment?
- 15 The attached photos show the existing WC1 which give a better view of what the area will look like than the dull superimposed WT’s in the picture shown by CES. Now one must add another 45 turbines, 10% larger, and one can understand the visual impact on the environment. These are from the Duyker Eiland – Paternoster dune road, fourteen km’s away, which is used by many tourists, and not from the much closer Britannica Heights.







Anne & John Todd

Registered I&AP's

2nd July

AVIFAUNAL COMMENTS

DEA project reference number (14/12/16/3/3/2/1057)

It seems strange that people who have not been in the country that long and therefore do not have the years of experience of the birds of RSA are chosen to research the Avifauna when there are many local specialists; still one of the previous EIA's used a paediatrician to produce the report on effects of WF's on health.

The surveys of the bird community monitoring programme including the initial reconnaissance of the area and selection of sampling locations were conducted between June 2014 and May 2015. This is now four years ago and could have changed significantly, especially with the WC1 now being operational. Could birds, and bats, not have moved out of the WC1 area and into the proposed BWF area due to the turbine activity, thus increasing the numbers in this area?

It is stated that SABAP 2 was consulted, but "the number of lists submitted for this area in the SABAP 2 is not yet adequate for the single use of this more recent data source". It appears that SABAP 2 has not been consulted since 2015 as there is a competent resident in the area who has been doing monthly monitoring of the affected pentad for the last two years. Would these records not be available and beneficial to the assessment?

"The specialist conducted a reconnaissance site visit in October 2017 and it was confirmed that the general characteristics of the study area have not changed since the initial bird pre-construction monitoring campaign". This site visit was conducted two years after the original assessment, it has been two years since the visit and WC1 has become operational in this time. Is one reconnaissance site visit considered adequate for determining there has been no change to the bird population and their habit's?

"If there is a significant gap (i.e. more than three years) between the completion of the initial pre-construction monitoring and impact assessment, and the anticipated commencement of



construction, it may be advisable to repeat the preconstruction monitoring (or parts thereof) to assess whether there have been any changes in species abundance, movements and/or habitat use in the interim”.

As there has been a significant gap (more than three years) between the completion of the initial pre-construction monitoring and impact assessment, and the anticipated commencement of construction, which gap will be larger by the time construction commences if the project goes ahead, will the preconstruction monitoring be repeated?

“Additionally, it is our opinion that the bird community in the area has also not substantially changed since the end of the previous monitoring programme. Thus, the characterisation of the bird community present at the time, as well as the impacts assessed are still considered to be valid and applicable to the area currently proposed for development”

This is based from monitoring done sitting behind a desk and on one site visit?

“The quantification or even evaluation of cumulative impacts is uncertain as there is not a generalised knowledge of the large scale movements or connection between bird populations within the Peninsula. If present, cumulative impacts will be reflected on a very rapid decline of bird populations far from expected from a single wind energy facility operation”

Should this “generalised Knowledge” not be gained before there is a very rapid decline in bird populations, by which time it will be too late for many birds?

“Considering all of the above, we can conclude that the original bird pre-construction monitoring studies conducted at Vredenburg WEF are still valid and accurately represent the bird community trends expected to occur at the Boulders Wind Farm Project in this current EIA process” This conclusion is considered valid and accurate even though four years have passed?

It is stated that Blue Cranes generally fly very low and over short distances - their usual reaction when disturbed - but observations were recorded at Rotor Swept Height. We have observed them circling at an estimated 200-300 m above Britannica Heights (350 – 450 above MSL) and then heading for the proposed BWF site area, so they must at some stage fly higher than 10m and for longer distances!

There is also no mention made of Cranes nesting in the area, we have seen parents with chicks in the area on a few occasions and these were reported to previous studies, nor is there mention of the numbers of cranes present in the area, often more than 100.”

Blue Cranes were mostly observed close to drainage lines and the associated habitats in the southern section of the study area” We have observed Blue Cranes in crop lands feeding.

There is only mention made of Verreaux’s Eagle some thirty km to the South, we recently had one flying and settling on Britannica Heights. There is also no mention of Fish Eagles or Ospreys which fly over the area.



Is it not of concern that 25% of raptor contacts were frequently observed flying at rotor swept height with many of these raptors having an unfavourable conservation status?

Over what area does turbulence created by turbines in close proximity and downwind from each other create problems for birds by them getting caught up in it and possibly deflecting them into the blades, even if they do not fly directly into the blades?

It is of concern to note that the specialists consider passerines to have a “Least Concern” conservation status. Many tourists visit Britannica Heights to view the five Larks and not the forty five wind turbines. Also that it is acceptable if many are killed or displaced as they are plentiful and reproduce rapidly, this appears to give the attitude of the **specialists** to this report!

No-go areas which must be avoided from the proposed WF development in order to reduce impacts on sensitive bird species to a minimum, and yet the layout shows turbines right on the edge of some of these areas, with rotor blades encroaching up to 51.5m into these NO_GO AREAS.

Throughout the WC1 projects’ first 14 months of operational monitoring, 54 bird fatalities were found – 57% birds of prey - (Bioinsight EIA) = +/- 1200 over WC1’s lifespan along with other WEF’s, pollution, poisoning, etc. then add the accumulative effect of the BWF and the creation of an even smaller flyway between the two IBA’s and what does this number increase to?

“Turbine placement will probably lead to the loss of a portion of hunting and feeding grounds, which could be detrimental to small passerines, Raptors, Falcons, Bustards and Cranes. Nevertheless the areas required for the turbine platforms represent only a small percentage of the total area of the Boulders WF”. The areas might only be small for each turbine, but when one considers the dangers to birds flying between turbines in the overall BWF area the area is large.

“Construction impact Duration (Very short)”. Two years, at least, is very short?

A concern is the increased barrier affect that the two sites will have on the known flyway between the two IBA’s. It is suggested the flyway may have moved to the West which would place the propose BWF in the path of the flyway. The proposed area of BWF is in an acknowledged bird flight path between the IBA areas of Langebaan Lagoon and Velddrif. Radar monitoring should confirm this, especially data collected during night time hours, or has it confirmed this and is this why the data is not available to I&AP’s.



Why is the use of trained dogs not insisted upon to search for bird carcasses as this has been proven to be one of the most effective methodologies with detection rates of up to 96% of all the carcasses present in the field, opposed to the approximately 10 to 20% efficiency of human observers, this especially during the crop season?

Will local and visiting birders and interested parties be allowed to visit the area of the WT's to witness for themselves any ill effects to the birds? This should be a preconditional agreement with land owners.

“However, it is also worthwhile to note that the intensity of disturbance will also get less as the developments start getting decommissioned one-by-one”. This in twenty five years time when nobody knows how much damage will have been done, or if any birds and bats will be left - especially considering terms used in the report such as “**If** this is to be true, **may** be avoiding, **Assuming** this is true, **not suspected** to result in any unacceptable loss or impact, it can be **assumed**” – these terms do not sound as if Bioinsight have much confidence in their report. It is also stated elsewhere in the report that technology will probably have increased to the stage where the WF will be refurbished and not decommissioned.

Doug Portsmouth

From: Portsmouth <mail@portsmouth.co.za>

Sent: Monday, 01 July 2019 18:35

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

Subject: BOULDERS WIND FARM - DRAFT EIA REPORT COMMENTS

Many thanks for arranging our recent focus group. I appreciate that such events are not always comfortable for the participants on either side of the fence.

I have attached my comments in relation to the Boulders Draft EIA report for your inclusion.

If you have any problems opening the report or have any queries, please do not hesitate to contact me.

Kind regards

Doug Portsmouth

(Attached)



Ms Maura Talbot
Public Participation Coordinator
Coastal and Environmental Services (PTY) Ltd
The Point, Suite 408, 4th Floor
76 Regent Road, Sea Point
Cape Town
8060

PO Box 124
St Helena Bay
7390

30th June 2019

Dear Ms Talbot

BOULDERS WIND FARM – DRAFT EIA REPORT

Further to your notification of the availability of the Draft EIA Report of the above application, I would like to submit the following comments for your records:

- 1. I object to this application as it is located in an inappropriate setting, namely:**
 - In direct view of our property
 - In an area of unique beauty and sense of place
 - In an area that is utilised heavily by resident and transitory birdlife
 - In an area that is significantly reliant on tourism for its economy

It is my belief that the Boulders Wind Farm will have unacceptable adverse effects on all of these factors.

2. COMMERCIAL ENTERPRISE AND LOCATION

The developer of the above application is a commercial enterprise and thus their prime motivation and decision-making is driven by the need to maximise profit and return on investment.

Within the Draft EIA Report, representations have been made that the Wind Farm project must be granted approval as it will yield benefits to many parties, ranging from The Nation to local residents seeking work. Whilst this is possibly true, these benefits will accrue wherever a wind farm is located.

With this in mind, it is reasonable to draw the assumption that the real reason that the developer prefers the location selected is that it will maximise their profits and return on investment.

Whilst these commercial motivations are normal in a capitalist economy, I believe that these commercial motivations should not be allowed to take precedence over and to the detriment of the existing residents, businesses and environment.

The developer should be encouraged to seek an alternative location for this project, where these conflicts are not present. The West Coast is a large region with many other locations suitable for this project.

If the profitability of other locations cannot match that of the location in this application, then as is normal in a commercial business, the business model must be redesigned to optimise the situation – for example lower turbine site rentals for land owners.

3. RENEWABLE ENERGY GENERATION AND LOCATION

I support the need to generate energy from renewable resources.

However, the implementation of a renewable energy strategy must be carried out with regard to exercising correct selection of sites, especially as both wind and solar installations are very disruptive to the environment.

It is my belief that the choice of site of this application is entirely wrong and the application should be denied.



4. VISUAL IMPACT

I am concerned that the Boulders WEF will visually intrude on the views that we enjoy from our property on Britannica Heights.

Britannica Heights is a residential suburb of St Helena Bay that sits on top of the escarpment overlooking the proposed Boulders WEF.

The West Coast One WEF is partially intrusive to our views, but fortunately it is situated out of the direct view down the valley to Paternoster. This WEF provides us with a direct visual reference to be able to state that the Boulders WEF must not be allowed to encroach beyond the line of sight between us and West Coast One WEF.

The Visual Impact Assessment Report has concluded that the visual impact of Boulders WEF will be severe. Nevertheless, the Visual Impact Assessment is deficient in its pictorial portrayal of the visual impact of the wind turbines as viewed from Britannica Heights. Despite my request at the scoping report stage for a pictorial representation to be made from my & neighbouring properties, the specialist chose to show only one property, which is further away from the turbines.

In the light of this I have to question the impartiality of both CES and the specialist as they are either ignoring the request or are taking steps to avoid the negative effect that a number of proper visual representations will make to the application.

Further, whilst mitigation of the visual impact is strongly recommended in visual impact assessment, the nature of the landscape allows for no mitigation.

It is my belief that the severity of the visual impact creates a fatal flaw to this application.

5. SENSE OF PLACE

I am concerned that the sense of place that is enjoyed by our communities and businesses will be destroyed by the intrusion of the Boulders WEF.

The countryside between Britannica Heights and Paternoster creates a unique and beautiful sense of place. It is a rare part of the country where a harmonic balance between coast, landscape, agriculture and nature has been established over a long period of time.

It is for this sense of place that our local tourism economy is so long established and successful.

It is my belief that the unacceptable risk of loss of the sense of place creates a fatal flaw to this application.

6. TOURISM AND EMPLOYMENT

As a rural location, employment and business opportunities in our community are very limited.

Fortunately, due to the beauty of the countryside and the sense of place that it creates, tourism is a viable option.

Whereas, the Draft EIA Report alludes to the creation of 17 job opportunities during its operational phase, the amount of employment that our tourism economy generates certainly dwarfs this number.

As a resident of Britannica Heights, I have first-hand knowledge of the number of tourism-related businesses started and run by our community. We have ourselves just opened a tourism business, which leverages the view from our escarpment across the countryside to Kasteelberg and Paternoster.

All of these tourism businesses create employment. Indeed, the main source of employment in Paternoster is undoubtedly tourism.

It is of grave concern that Boulders WEF will negatively impact on the attraction of our businesses, resulting in less visitors and a consequent downturn in viability and therefore employment.



7. BIRDLIFE AND BATS

It is a universally known fact that wind turbines have a highly detrimental impact on birds and bats.

The location chosen for the Boulders WEF is rich in many species of birds.

As a resident, I regularly observe numerous species of raptors, including the rare Verreaux's eagle. I have the privilege of hearing daily the distinctive calls of blue cranes, who live in the field adjacent to our property.

In addition to these birds, it is well known that, at night, birds commute from St Helena Bay/Berg River across the proposed site of Boulders WEF to Saldanha Bay.

Whilst the Draft EIA Report goes into detail about the exclusion zones where turbines will not be sited, to allow bird access, such an exercise is entirely unrealistic as birdlife cannot read maps and tend to fly in straight lines.

I would state that in my view the avian impact study is deficient as in certain sections, the specialist refers to certain birds &/or behaviours that suggest the specialist actually has a lack of knowledge of South African birds.

As a long-time resident of Britannica heights, we have never had a problem with mosquitoes. However, in the last 2 years the number of mosquitoes invading our house during summer has risen to the point that we have been forced to buy a mosquito net. As we are in a period of drought and there is no standing water in our environment, the only conclusion I can draw is that the bat mortality rate due to the West Coast One WEF is so high that the mosquito population is no longer under control.

If this is true then, Boulders WEF will only compound this problem.

This is a small point, but yet another reason why the Boulders WEF application is requesting an inappropriate location.

8. WEST COAST ONE WEF

My final comment concerns the West Coast One WEF, which we can see quite clearly from our property.

The location of this WEF is in the direction of Vredenburg and far enough away from our view line to Paternoster so as to be partially intrusive.

In short, we have learned to live with this development (even having a skyline full of blinking red lights at night). It should be noted that this development was approved with no genuine consultation with or knowledge of the residents of Britannica Heights.

It is in my view, false thinking of future developers, that if we can learn to live with one WEF, then we can learn to live with more and more. The cumulative effect of adding to the West Coast One WEF is unacceptable and any plans to do so should be rejected.

I hope that my concerns and reasoning are adequate for your needs. Should you require clarification of any point or additional information, please do not hesitate to contact me.

Kind regards

Doug and Gaynor Portsmouth
26 Columbine Crescent
(ERF 1789)
Britannica Heights
St Helena Bay

ST Helena Bay Residents

Smith Dereck

From: Derek Smit <rooihond@gmail.com>



Sent: Monday, 01 July 2019 13:31
To: Louise Van Aardt <info@cesnet.co.za>
Cc: Maura Talbot <m.talbot@cesnet.co.za>
Subject: Re: Boulders Windfarm Draft EIA Comments Closure reminder

Hi Maura !

The only comment I have is "Wind farms are great" the more the better !

We need the power !

rgds

Derek

De Kock Colin

01 July 2019

Draft Environmental Impact Assessment Report for the proposed Boulders Wind Farm
West Coast District Municipality
Western Cape Province
DEA Ref. No: 14/12/16/3/3/2/1057

01/07/2019

My comments regarding the Draft Environmental Assessment Report are attached:

1. The extract noted below is extremely concerning as it would appear that this iteration of the Avifaunal Final Impact Assessment Report was, in the main, a mere desk-top exercise using old, out-dated data, by foreign consultants with little experience of the area.

No apparent effort was made to interrogate possible population and distribution changes caused by the erection and operation of the West Coast 1 WEF.

As basis to the impact assessment, this report refers to the findings of the bird pre-construction monitoring surveys conducted at the proposed Boulders Wind Farm (WF), between June 2014 and May 2015.

2. It is of concern that the actual numbers of the sensitive species which were reported by the specialist observers and which have been recorded by the relatively high number of ADU atlassing cards, have not been adequately recorded and/or listed in the specialist study. It would appear that the transects which were walked by the specialists were not carried out, in the main, in areas of higher density of birds.

3. The effects of this proposed WEF when added to the existing West Coast 1 WEF will place in excess of 90 wind turbines over the established gathering and breeding areas of the resident Blue Crane grouping which is consistently in excess of 100 birds.



As a result of the Avifaunal Final Impact Assessment Report depending on old, quite possibly no longer relevant, data collected in 2017 at the time of a previous EIA (subsequently withdrawn), the current Avifaunal Final Impact Assessment Report makes no mention of the effect the construction of the West Coast 1 WEF has had on the distribution of bird populations which used to extend over the full area of the West Coast peninsula and which, as a result of the construction of West Coast 1, have moved territory and clustered in the area of this proposed development. It is currently a common experience to count higher numbers in bird groupings in the proposed area whilst carrying out regular censusing of bird numbers and species.

4. There are several established flyways over the West Coast peninsula which cross over the already established West Coast 1 WEF as well as the installation proposed by this application. In addition to the high number of migrant waterbirds transiting between the Verlorenvlei/Berg River wetlands and the Langebaan Lagoon, which usually fly at night, these flyways are also used by birds such as African Fish Eagle and Osprey.

The flyways extend, amongst other routes, over a significant portion of the range of hills to the west of St Helena Bay. The established West Coast 1 WEF and the proposed Boulders WEF combined will place an extended dense array of wind turbines over the same portion of the hills. Waders, and other birds, particularly when migrating south in large groupings, flying over St Helena Bay, will increase their altitude to overfly the hills and be faced immediately with a barrier of wind turbines placed across the full width to their flightpath. The same would obviously apply when approaching from the south.

It is common cause that the client has withheld radar mapping data which means that the Avifaunal comment on radar data, particularly that of migrating species, cannot be checked for veracity.

Obstruction of flyways is in contravention of several international conventions to which South Africa is a signatory, e.g. the Ramsar Convention on Migratory Species, UNEP Convention on the Conservation of Migratory Species of Wild Animals, Afro-Eurasian Waterbird Agreement and the Benguela Current Convention.

5. Placing of wind turbines

This comment is made based on the information in Fig 1-2: Project Layout of the proposed Boulders Wind Farm contained in the DRAFT Environmental Impact Assessment Report – May 2019.

It is common cause that variations have been made to the final proposed layout, and that I&APs have not been provided with this information as required by the Act and neither has the diagram Figure 1-2 of the Report available on the CES website been amended.

The comment, however, is made with reference to both the documented layout as well as to any revised layout.

The draft refers to Environmental Sensitivity Mapping which reflects no-go areas located within the project site.

The Sensitivity Map reflects a particularly broken up, patchwork series of no-go areas, over the entire proposed site, with some non-no-go areas wholly, or almost wholly, encircled by no-go areas.



The patchwork nature of the defined no-go areas is not acceptable. A discrete monolithic area should be defined as such, without a patchwork of go areas encircled by the larger no-go area.

To design the wind turbine siting as is, is almost an invitation for birds will fly in the greater no-go area, only for them to be confronted, here and there, by wind turbines.

On the farm Het Schuytje 21, the row of turbines 28, 29, 30, 32,34 35 is placed adjacent to a no-go area and the row of turbines 15, 22, 23, 24, 25 is similarly placed adjacent to another no-go area situated with a distance of approximately 300 – 400 m between the two rows of wind turbines.

With the wind turbines having a blade disc diameter of $\pm 90\text{m}$ and allowing for the rotor swept area not impinging on the no-go areas and for spacing between wind turbines, the corridor between the rotor swept areas of the wind turbines could be less than 100m.

Turbines 12, 14, 16, 17, 18 and 20 are placed in no-go areas or immediately adjacent to no-go areas.

It is an unacceptable risk to compel birds to attempt to navigate the proposed lethal hazard.

As it is not possible for birds to determine the immediate transition from no-go to go to no-go areas, there should be a medium sensitivity (transition) buffer of at least 200m around any no-go area. This proposed requirement is backed up by the statement by the Avifaunal Report consultants regarding 200m no-go areas and more particularly by the 2000m medium sensitivity buffer requirement noted in the extract below:

'500m no-go areas buffer, and 2000m medium sensitivity buffer around the active Secretarybird nest identified during the pre-construction monitoring period. 500 metres around this active raptors nest must be considered as a NO-GO area (no wind turbines are proposed for this area). Additionally, a 2000m buffer has been established around the nest to prevent disturbance of these particular individuals during the construction phase.'

The result of rational sensitivity mapping including no-go and transition areas, and excluding irrational patchwork, would mean that there is no likelihood of this proposed development being able to comply.

Mention is made of a minimum blade tip height of 55m above ground level. On level ground this may well allow for some slight measure of avoidance, however, on this site the hilly nature of the site means that whilst individual blade tip heights may be no less than 55m above the immediate ground level, a bird flying through the wind farm would be faced by an array of wind turbines placed at various heights., which is unacceptable.

The conclusion in the extract noted below is questionable as the birds would have been flying above sloping ground well below sight horizon height and would have, at best, provided questionable radar returns. Once again, the withholding by the developer of radar data is questioned.

Overall, of all flights recorded by the radar, only 1% of flights were shown to occur within the rotor swept zone, and most of these flights were recorded along lines of natural vegetation and along slopes facing the dominant prevailing winds in the area (SW).

The mention of 'less than 10m height' noted in the extract below is generally incorrect as Blue Cranes are regularly sighted at heights in excess of 20 - 30m, particularly when transiting between feeding and/or breeding areas. It is common cause that flights post-



flushing are usually for a short distance and of low height merely to exit the immediate area when disturbed.

'Due to its abundance and conservation status, the Blue Crane is a species of concern since it may be prone to collision at certain times (e.g. when commuting between roosting and feeding sites or commuting after farming activities which increase food availability). However, the species has been observed flying at rotor height only during very brief periods during the monitoring programme. In the remaining observations, Blue Cranes were mostly observed close to drainage lines and the associated habitats in the southern section of the study area, in large flocks, feeding or resting on the ground. On some occasions, the observers' presence flushed some birds. However, flights were still generally very low (less than 10m height) and short distanced.'

Of concern is the fact which the report downplays of the disturbances throughout the duration of the construction contract is that the total time-line of project activities from road creation to final commissioning of the WEF, which will impact directly, and negatively, on the resident bird populations. The time-line which could be up to three years would extend through at least two, and possibly three, breeding seasons, thereby causing breeding disturbance and the high likelihood of causing abandonment of further breeding and elimination of currently resident species.

All of this disturbance would be prior to the long-term after-effects of an operational windfarm.

It has been difficult to obtain during-construction and post-construction records of bird fatalities from many WEF's in the Western Cape area as alluded to in the extract below.

The potential impacts of wind turbines on South African bird communities are still largely unknown and still being determined and refined as more information is made available (Ralston-Paton et al., 2017). Therefore, data collection and further investigation is needed and pre- and post-construction monitoring should be implemented to fill these gaps and promote the sustainability of wind energy developments in South Africa.

A contractual mechanism which ensures the public availability of the results of such monitoring must be put in place.

6. Numbers of the construction issues are of serious concern should permission be given for erection of the wind farm:

6.1 The excavation for a mass base for each tower means that in the order of 1800 m³ (assuming base dimensions of 15m x 15m x 5m) of material will be excavated ($\pm 1125 \text{ m}^3 + \pm 60 \% \text{ bulking}$) per tower.

That gives total excavated material from tower bases of in excess of 80000 m³. There is no apparent indication of how and where this material will be stored during excavation or where it will be permanently disposed of. A major concern is the dispersal of this material. There are no adequate dispersal sites in the area and the potential for a major dust problem for the residents of Britannia Bay and Paternoster in windy conditions is extremely high.

The tower foundations are large reinforced concrete footings. It is assumed that the material removed during excavation will be utilised within the site to create hardstand areas for the cranes

and in reinstating the site after construction.



The comment above from the ITS Transport Impact Assessment is incorrect in that very little, or any, of the excavated material will be suitable for such hardstands.

There is no indication of any dust mitigation actions to be applied during the construction phase.

6.2 The Stompneusbaai/Vredenburg road DR2160 is due to be upgraded and in addition, in excess of 10km of access roads will have to be constructed.

The documentation refers to upgrading of farm roads for access roads. This is disingenuous as the farm roads referred to, and which will be subject to upgrade, are currently very little more than farm tracks. These tracks will have to be converted to full specification access roads ab initio so as to be able to cope with the load masses of the tower base heavy plant, the load masses of trucks removing excavated material, the load masses of pre-mix concrete delivery to each base, the load masses of the delivery of turbine elements (mast, gondola and rotor blades) and the load masses of the heavy-lift mobile cranes which will unload mast elements and then hoist mast elements, so comment referring to upgrading is disingenuous.

The sub-base and wearing course material requirement will be in the area of 6 - 9 m³/linear meter of road construction, that is 6000 - 9000 m³/ km of constructed access road.

The internal access roads will be constructed mainly of local materials sourced from the local surrounding areas and these roads will be retained and used for inspection and maintenance of

the wind turbines during the operation phase

The extract above from the ITS Transport Impact Assessment is incorrect as there is no known supply of material suitable for road construction in the local area and all such material would have to be trucked in from distant excavation sites. The volume of traffic by large tipper trucks through St Helena Bay and/or Vredenburg is unacceptably high as is the potential for damage to the existing road system.

There is no indication of any dust mitigation actions to be applied during transport and storage of road materials during the construction phase.

6.3 The volume of concrete to be delivered to the turbine bases by mixer-trucks (1125 m³ at 10 m³/load = ± 112,5 return road trips/turbine base) which indicates high potential for damage and destruction for surrounding road infrastructure.

Even if the concrete is mixed on site, in which case there would be further damage and degradation surrounding a batch mixing plant and its concomitant materials storage areas, the base materials (sand/stone/cement) will have to be delivered through St Helena Bay and/or Vredenburg causing serious traffic congestion and high potential for road damage for surrounding communities.

The ITS Transport Impact Assessment makes no apparent finding on the impact of this material delivery from remote suppliers to the site.

6.4 The delivery of turbine elements will have extreme disruptive and negative impacts for traffic, and road damage, in the St Helena Bay and/or Vredenburg areas as the road infrastructure has no capacity to manage such traffic congestion.



The ITS Transport Impact Assessment refers to, in comment 6.0 Existing Conditions, the dimensions and state of MR533 St Helena Bay Provincial Main Road

The reference is correct only from the R399 up to the entrance to Laingville, whereafter the road narrows, the condition of the road surface deteriorates and there are few hard shoulders.

The above assessment makes no reference to the state, width and incline of Stompneus Bay Provincial Divisional Road DR 2160 from the turn off in Stompneus Bay over the hills or its suitability for the delivery of extreme loads.

Colin de Kock
0832505217
coldek@icon.co.za
P.O. Box 597
St Helena Bay
7390

Cloete Gerald

From: gerald Cloete [mailto:cloetegerald@yahoo.com]
Sent: Tuesday, 02 July 2019 13:31
To: Louise Van Aardt <info@cesnet.co.za>
Subject: SUPPORT BOULDERS WIND FARM PROJECT

Hi

As a resident in the St Helena Bay area I, Gerald Cloete, after having attended and read the report, support the establishment and favourable consideration of this project from all the relevant government departments.

My reasons are as follows;

St Helena Bay economy has been historically based and dependent on the marine sector. This industry is seasonal orientated and has in recent years reached their ceiling with employment opportunities. Apart from this fishing stocks has been going down each year and seasonal workers are currently working less than 7 months for the year. As a result many households are being left with very little to get along.

Apart from the fishing industry there are no other industry absorbing unemployed citizens and this is adding to many social evils that exists in this area.

Furthermore the current situation is also responsible for the youth not venturing into any other opportunities as the sea is viewed as their only outcome.

I am further convinced that the windfarm would have a positive outcome on employment opportunities and also professional opportunities.

The current scope of the project are also making is hopeful that if the amount of turbines could be increased it would also mean more corporate social investment and also employment opportunities.

It is for these reasons that I am very positive and proud to support this project 100% and urge all relevant departments and institutions to give the go ahead for this project.



Regards
Gerald Cloete

Shane

SMS received from 071 596 5413- Shane
02 July 2019

My name is Shane and I'm a resident of St Helena Bay. I herewith would like to express my support for the Boulders Wind farm development. Our country is really under tremendous pressure and this project can assist with unemployment, skills development and poverty alleviation. With the major pressure on our environment I think this development can contribute to create greener energy in our areas. Regards Shane

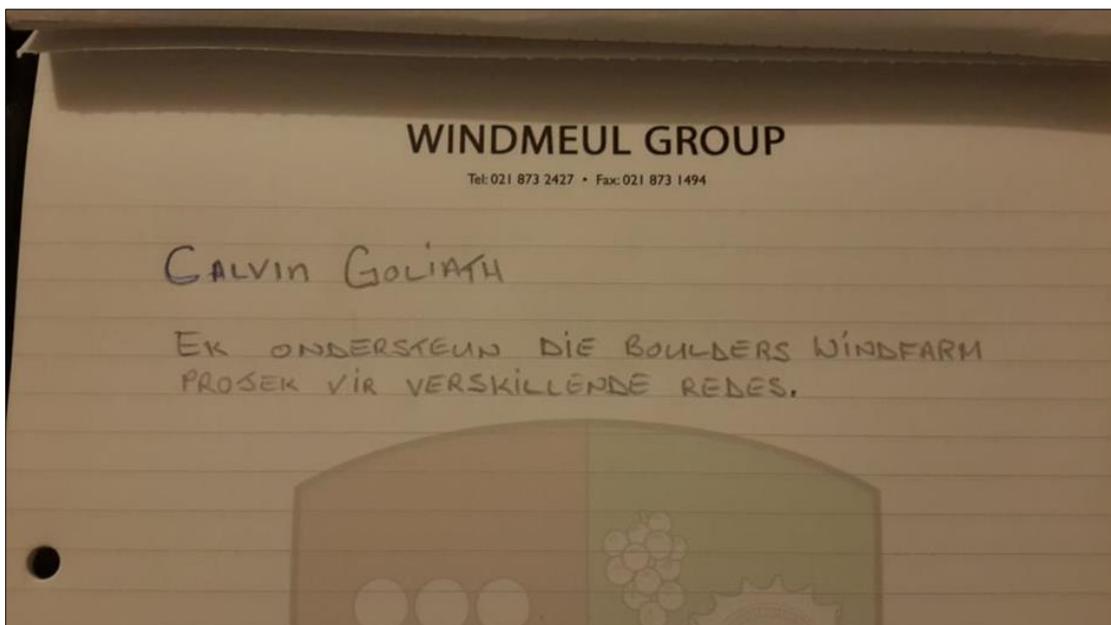
Magerman, Wilfred

Message received on 2 July via Whatsapp

Wilfred Magerman ondersteun die Boulders Windfarm projek.
4 4347

Calvin Goliath

Image received via Whatsapp 071 940 0660
03 July



Petitions



Roon Petition Paternoster

2019.07.02

Attention Maura Talbot -m.talbot@cesnet.co.za
Michael Johnson -m.johnson@cesnet.co.za
CES – ENVIRONMENTAL & SOCIAL ADVISORY SERVICES

Copy Lindsey Gaffley -Lindsey.Gaffley@sbm.gov.za
Gary Tomlinson -Gary.Tomlinson@sbm.gov.za
Nazeema Duarte -nazeema.duarte@sbm.gov.za
Safwaan Abrahams -Safwaan.Abrahams@westerncape.gov.za
Dorethea Kotze -westcoastdm@wcdm.co.za

ROON
ARGITEKTE . ARCHITECTS
MvN C.E. Roon BArch PArch MArch CA

KRIEDORINGWEG / ROAD 10
POSBUS/ PO BOX 325
PATERNOSTER 7281
WESKAAP WESTERN CAPE
T/F: 022 752098
S/C: 083365281
E-PM: a@m.roon@gmail.com

COMMENTS ON THE SCOPING REPORT FOR THE BOULDERS WIND FARM
FARMS BOEBEZAKS KRAAL 2/40,-3/40,-5,40, FRANS VLEI 2/46, SCHUITJES KUP 3/22,-1/22, DAVIDS FONTYN 9/18,-7/18, HET SCHUITJE 1/21, UITKOMST RE/6/23

Maura Talbot / Michael Johnson

*This letter under the name of **Aksie Paternoster Action** was sent to **138 rate payers** in Paternoster through a MailChimp campaign email with a total of **116 replies** (all but 2, supporting the following comments) – please see email addresses attached. In addition please find a handwritten petition list as well.*

Sustainable energy sources must be provided, but not at our expense!

We are of the opinion that sustainable energy generation is definitely part of the solution to our electricity shortages. However, this may not be to the detriment of all of us, who already have invested and contributed to existing economic undertakings beneficial to Paternoster.

Only German companies (Enercon, EnergieQuelle, and Saertex), a few farm property owners and very few South Africans (who do not live in Paternoster) will benefit from this venture. We, as ratepayers and property- and business owners, stand to only loose from this proposed Boulders Wind Farm.

VISUAL IMPACT

- Wind turbines change the **silhouette** of the environment and have an adverse impact on the attractive appearance of Paternoster currently seen as the fisherman's village in an intact natural/ rural environment.
- Where the West Coast One turbines are approximately 150m high, the Boulders proposal is for even **15m higher turbines**.
- The most disturbing effect is the **white flashing lights during the day and red at night**, - as if you were heading down the main street in Johannesburg instead of walking along a wide open beach.
- According to the report 3.4.5 *The anticipated visual impact of lighting of the WEF at night is likely to be moderate* The Report under 6.2.8 refers to *Residents and visitors to this area are therefore seen as sensitive visual receptors. Within a 10km radius, viewer incidence increases*. We argue the example of Hopefield Wind Farm, which is a visual distraction at night already at a 30km distance on the road from Malmesbury.



Paternoster main beach completely put off by the towering wind mills

- The total proposed number of 45 turbines (in addition to the West Coast One Wind Farm), create the effect of a **forest of moving structures** with a height higher than all buildings in Cape Town.
- The Noticeable **negative visual effect**, without a doubt, will result in a decline in tourism.
- The R45 towards Paternoster is regarded a **scenic route** and as such may not be spoiled by the Boulder project. *The Integrated Heritage Impact Assessment and Assessment of Economic Impacts* both refer to the importance of Vredenburg-Stompneus Bay and Paternoster-stompneus Bay roads but totally ignore the historic, scenic and visual qualities of the Vredenburg-Paternoster Road, particularly in relation to views towards the visually prominent Kasteelberg koppie against a backdrop of moving wind turbines.
- According to Conditions of the previous Environmental Authorisation 12/12/20/1581 par. **10.7.4 Turbines must be placed at least 2km from the local road to Stompneus Bay**. If this was adhered to, 13 less turbines would have been placed on West Coast One project and 30 could not be placed with the Boulders proposal.
- Another very negative aesthetic impact is caused by the **construction of power lines**. No visual picture is provided, and in any case should be a requirement that no new power distribution may be erected above ground.
- The 1200 m² platform at each turbine along with the approximate doubling of roads to all turbines have a negative **impact on the landscape**.

SENSE OF PLACE

- Referring to the impact on the SENSE OF PLACE under Report 6.9.1 and 6.9.2 - *An impact on the sense of place is one that alters the visual landscape to such an extent that the user experiences the environment differently, and more specifically, in a less appealing or less positive light. The potential cumulative visual impact of the wind farms on the visual quality of the landscape. - The cumulative visual impact of the West Coast 1 WEF and the Boulders WF is expected to be of high significance.*
- Paternoster is characterised by West Coast architecture *that offers a picturesque view of the residential area against the backdrop of large areas of low sensitivity croplands alternating with occasional intact or near-natural fragments of indigenous vegetation and rocky outcrops.* In terms of 4.1.3 *the cumulative impacts, when considered in conjunction with the West Coast 1 facility, the study found the Visual Absorption Capacity of the receiving environment to be low, as a result of the vegetation and open vistas that are largely uninterrupted by urban development. This combined with the height of the proposed wind turbines results in unavoidably HIGH visual intrusion. It was also noted that the landscape is close to, if not already visually saturated and can possibly not accommodate the additional turbines without irrevocably changing the cultural landscape. Further to*



Boulders Wind Farm seen from Kasteelberg

INTERNET AND AIR SPACE

- Problems exist with the **quality of the internet due to interference** from the turbines. The Report's answer under 10.1 *is If complaints are received from surrounding landowners regarding this issue, the developer must investigate and mitigate these issues to the best of their abilities.* What mitigation measures are the best of their abilities?
- As mentioned under 4.1.9 *potential of wind turbine generators to interfere on radio navigation equipment* the BWF falls outside the 35km distance from the Langebaanweg Aerodrome, but is only 15km away from the Saldanha Aerodrome. In addition farmers (on whose land wind turbines will be built) no longer seem to have a need for crop **spraying by planes**, adjacent farmers still might regard this as essential?
- Also mentioned under 4.1.9 *much care should be taken to consider visual flight rules routes, proximity of known recreational flight activity such as hang gliders, enroute navigational facilities etc.* **Light aircraft and microlights** using the area regularly for recreation will be negatively influenced by the BWF.
- The developer's **bird studies** refer to NO-GO areas eg. water ways and beacon points (for hunting, feeding nesting grounds). Obviously birds will fly between these points and this is exactly where the turbines are supposed to be erected.
- Referring to Bat mortality and mitigation *by curtailment plans (once a threshold of fatality is reached): increasing the cut-in speed for specific turbines with high bat fatality rates at specific times of night, under specific environmental conditions when fatality is greatest.* This impact may be minimised by siting turbines away from important habitat features for bats, as well as bat roosts. Our concern is that monitoring and control of the cut-in speed at night will not be enforced.

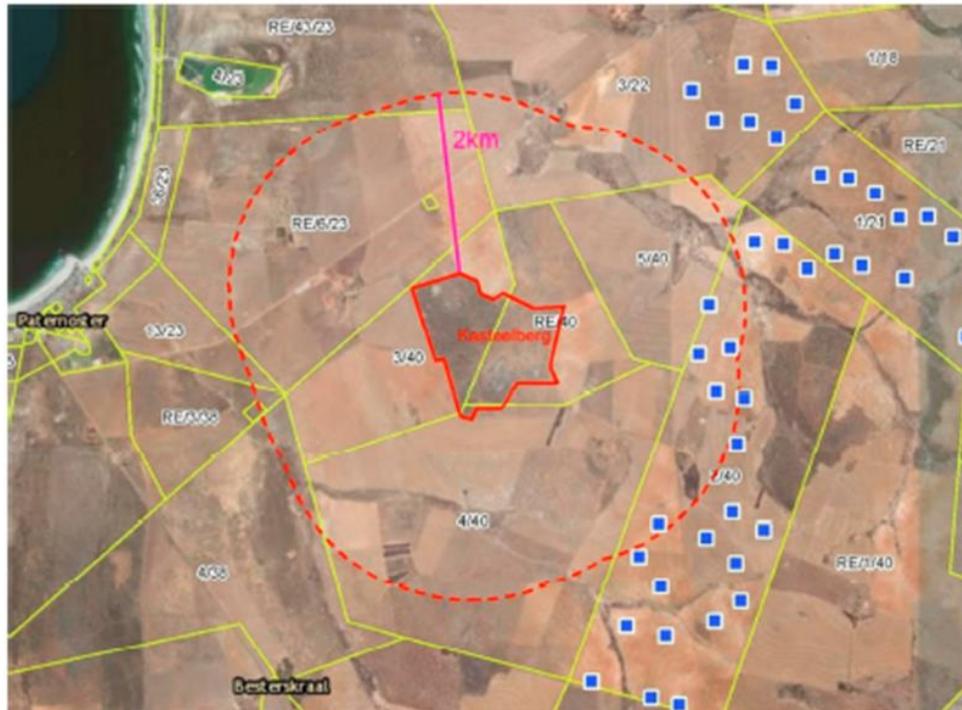
HEALTH ASPECTS

- Although this may not be seen as important enough, animals (domestic and wild) may well be affected, specifically with regard to **vibration** and the **stroboscopic effect** of the turbines. We argue that this might chase them away even from the NO-GO areas. Can the Developer refer to studies in this regard?
- People become aware of **noise** as soon as this is 3– 5 dBA above the ambient noise. The report shows that the minimum effect will be more than 7dBA above ambient noise. Distance plays a major role but low frequencies (of the turbines) travel much further.



this, the greater size of the Boulders turbines makes them far more imposing and intrusive when viewed from the same distance as West Coast 1 turbines, and generally more visible when viewed at a distance. In addition 5.1.3 mentions that the greatest impact arising from visual intrusion is loss of sense of place and degradation of the significant rural landscape. These factors can have negative impacts on the significance of heritage resources and the cultural landscape that is difficult to mitigate due to the size of the turbines and their visibility in the landscape.

Even with the proposed moving of 7 turbines to the east these well-defined descriptions in the Report are still applicable and enough reason NOT to proceed.



The 2km radius measured from the bottom of the koppie

HERITAGE IMPACT

- According to Klein & Cruz-Urbe 1989; Smith et al 1991 there is to be no development to this heritage site area within a 2km radius from **Kasteelberg**. However this stipulation does not specify from what point of Kasteelberg (top of the koppie or where the ritual sites were?) The difference may well have an effect of an extra 1km, which might impact on 5 turbine positions.
- One of the demonstrated supporters (K Sadr- School of Geography, Archaeology and Environmental Studies at WITS) put in a conditional support, stating- *as long as no turbines and associated infrastructure are constructed anywhere higher than the 80m (above sea level) contour line of the hill Kasteelberg*. Most of the proposed turbines are positioned at more than 80m above sea level. Considering that both tops of Britannia Heights and Kasteelberg are approximately 150m above sea level and the turbines positioned at an average level of 95m plus 165m will dwarf Kasteelberg with more than 100m. This leaves little ambience for heritage site.



- **Noise and health** impact studies in the Report downplay the effect because the turbines are not positioned close (2km) to dwellings. AS per 11.3.1 *The developer must investigate any reasonable and valid noise complaint if registered by a receptor staying within 2,000 m from the location where construction activities are taking place or from an operational wind turbine.* It seems unlikely that in a case of such legitimate claim the turbine installation would be dismantled.
- In a recent law case in Ireland the wind energy company, Enercon had to admit in open court that their wind turbines damaged the human health of nearby residents.

PROPERTY VALUES

- If the Applicant argues that *some property owners may often have unsubstantiated perceptions concerning the negative impact of renewable energy projects on property prices in general, which is why it is a frequent concern raised by the I&APs. The above shows that such perceptions cannot be corroborated with any empirical evidence, therefore, it is important to dispel these as early as possible i.e. during planning stages of the project.* We argue the opposite, that the Developer is absolutely unable to prove that renewable energy projects have a positive effect on property prices.
- The report refers to the increase in property values over a 10-year period, but can in no way prove that it will be better than without the BWF. **The BWF cannot have a positive effect on property values.**
- The Report refers to a **financial impact comparison** made before and after completion of the **West Coast One** wind farm. This is a futile exercise because the WCO is situated largely 'behind' Paternoster and does not have the same effect as what is proposed now. We should rather insist on a study why European countries have stopped erecting turbines?
- Referring to 2.3 regarding Property Values, Tourism and Economic Issues- *The key causes for the declining performance, as derived from interviews with tourism facilities' owners, are the drought experienced in 2017/2018, increased competition, and affordability for the tourists.* No mention is made about **crime as a major factor in decline in visitors.** This directly relates to the void left when job seekers cannot find employment on a permanent basis. Property prices in Paternoster did not increase at the same rate as for instance in Vredenburg. To mention that according to *Four quoted overseas studies - It could find no statistically-significant evidence that proximity to a wind turbine affects home values* cannot be submitted as proof, since many more overseas installations have caused a huge uproar. What reference is used when stating that *some of the local tourism product owners have experienced a positive effect on their business activities as a result of the development of West Coast One Wind Farm during its construction.* Our view is that MOST of the local tourism product owners have experienced a **NEGATIVE** response from visitors.

JOB OPPORTUNITIES AND SOCIAL IMPACT

- **Creation of job opportunities** and skills development, are largely unfounded. Experience from West Coast One, jobs did not materialize, except for one contractor appointed to erect not much more than a few carports at the site offices.
- The Report argues that- *The proponent should implement a "locals first" policy, specifically with regard to unskilled and low skilled opportunities. The focus should be in communities in Paternoster and St Helena Bay.* We regard the influx of a high volume of job seekers over a 2 year time span as a huge problem. Past experience has shown that at the end of their 2-year employment low skilled labourers don't return where they came from and aggravate local unemployment. This unemployment is a contributing factor to crime, which in turn is directly responsible for decrease in property values.



- It would be interesting to know which **training opportunities** *will be offered to qualified local people to be up-skilled to undertake certain roles during the construction and operation.* We understand that at least a substantial number of projects are necessary to warrant a local manufacturing plant of e.g. the rotor blades. Until such time, however, this effectively means that we as taxpayers are subsidising jobs in Germany.
- The Social Impact Assessment Report boasts *that the procurement spend over the 20 year operation phase for BW1 to BW4, 1S2 and 1S2 will be in the region of R 75 billion* – does this mean that we have to anticipate 3 further Boulders Wind farms?
- The number of jobs created by the Paternoster tourism industry on a permanent basis outweighs that of the BWF many times over and cannot even start to compare.

ALTERNATIVE ENERGY SUPPLY

- Under Alternatives 5.3 reference to *dependence of nuclear energy generation on high volumes of water preclude its development on the proposed site.* This is not true with a pebble bed reactor, which is safe, is not water dependant and does not depend on the weather.
- The fact that **wind conditions are less favourable during winter** (when demand is highest) means that Eskom still must provide for maximum demand. Until energy from renewable resources cannot be stored, a reliable source as a back-up (eg nuclear) must be provided. If this is available, then the wind farm becomes obsolete again?
- Furthermore the Report argues that *it is essential that the Western Cape increases its resilience against external energy supply disruptions and the massive price fluctuations caused by national or international decisions with regard to energy commodities (coal, oil)*-The Western Cape electricity supply has not been separated from the rest of South Africa and even were this to become reality should still not be to our detriment.
- **Gas generated electricity**, (being able to switch on and off when not enough power is generated by the wind farms) is very expensive. Similarly battery systems of this size are still in the beginning stage of development. Therefore
- It is incomprehensible why the State does not have a **coordinated plan** with all available technologies (solar/ wind/ coal/ hydrologic/ gas etc) to establish where developers are allowed to initiate with a particular solution.
- The Methodology For Assessing Impacts and Alternatives under 7.3.1 mentions that if *An irreversible and permanent change to the affected system(s) or party(ies) which cannot be mitigated. For example the permanent loss of land. These impacts would be considered by society as constituting a major and usually permanent change to the (natural and/or social) environment, and usually result in severe or very severe effects, or beneficial or very beneficial effects.* Though the turbines are presented as only a 25+year installation, we argue that even this so called temporary development has a life time negative consequence of **VERY HIGH significance**.
- Boulders' ideal location, **due to low cost** (close to electrical- and road infra structure and nearby harbour), certainly is very profitable for the developer. We as ratepayers were instrumental in establishing this infra structure which the developer now hopes to profit from to our detriment.

DECOMMISSIONING

- When the Report 2.3.5 refers to **decommissioning of the Wind Farm** after say 25 years, the Applicant must not be surprised at our skepticism. Similar 'rehabilitation' of mines has shown that these are sold close to the end of their life expectancy with a new owner not being able to pay for these cost, conveniently going bankrupt, leaving the responsibility to the State. The



State, in turn opts for doing nothing, leaving a previously beautiful area devastated for our grandchildren to 'enjoy'.

- In case of Non Compliance according to 10.1 *Any non-compliance with the agreed procedures of the EMP is a transgression of the various statutes and laws that define the manner by which the environment is managed. Failure to redress the cause must be reported to the relevant authority for them to deal with the transgression, as it deems fit.*- This questions who would be allowed to access the farms to check compliance – for instance would bird watchers be allowed to do regular checks?
- There should be a **trust** to which the developer from the beginning deposits enough money that allows for the removal of the **turbines, platforms, roads, 300 to 700 tons concrete foundations, and rehabilitation of the environment**

SUPPORT FOR THE BOULDERS WIND FARM

- We perceive that **public participation** is used only to meet legislative requirements. As ratepayers we are afraid that the public participation process is used to demonstrate due diligence without giving enough attention to valid objections/comments.
- **Demonstrated supporters** for Boulders Wind Farm are:
 - Uitkoms boerdery, Geldenhuys Jonker Attorneys and Saretec- who stand to profit from the development
 - Western Cape Government Dept. Economic Development and Tourism, Cape Chamber of Commerce and Industry, City of Cape Town Energy, Western Cape Transport Administration and Licensing, Wesgro Cape Town and Western Cape Tourism, Trade & Investment – to these departments our response should be if they would consider putting up a wind farm on Table Mountain.
 - University of the Witwatersrand (K Sadr School of Geography, Archaeology and Environmental Studies) put in a conditional support stating – please note the earlier reference to this condition.
 - Elu -Building Tomorrow Today- strange to draw support from a Cape town kids education centre
- Organizations submitting a single document with many signatures of opposition are only registered as a single source of comments. Simultaneously the above letters of support from parties outside the affected area as well as parties who stand to benefit are handled on par with hundreds of objectors thrown in as one?
- Rate payers would like to have insight in how **restrictions are enforced**. It is important that a method be implemented whereby residents can see how all objections or concerns are addressed.

There is absolutely no reason why anyone in Paternoster should support the intended Boulders Wind Farm.

Yours sincerely



Section 2 of NEMA contains principles (see Table 4-1 and Government Notice 982) relevant to the proposed wind farm, and likely to be utilised in the process of decision making by DEA

Table 4-1. NEMA Environmental Management Principles

(2)	Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.
(3)	Development must be socially, environmentally and economically sustainable.
(4)(a)	Sustainable development requires the consideration of all relevant factors including the following: <ul style="list-style-type: none"> i. That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied; ii. That pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied; iii. That waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner.
(4)(e)	Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle.
(4)(l)	The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.
(4)(j)	The right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected.
(4)(p)	The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment.
(4)(r)	Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.

GOVERNMENT NOTICE 982, ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED 2017). APPENDIX 3: SCOPE OF ASSESSMENT AND CONTENT OF ENVIRONMENTAL IMPACT ASSESSMENT REPORTS

- 3.** An environmental impact assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include—
- (h)** A full description of the process followed to reach the proposed development footprint within the approved site, including:
 - (v)** The impacts and risks identified including the nature, significance, consequences, extent, duration and probability of the impacts, including the degree to which these impacts—
 - (aa)** Can be reversed;
 - (bb)** May cause irreplaceable loss of resources; and
 - (cc)** Can be avoided, managed or mitigated.
 - (vi)** The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;
 - (vii)** Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
 - (viii)** The possible mitigation measures that could be applied and level of residual risk;
 - (i)** A full description of the process undertaken to identify, assess and rank the impacts of the activity and associated structures and infrastructure will impose on the preferred location through the life of the activity, including—
 - (i)** A description of all environmental issues and risks that were identified during the environmental impact assessment process; and
 - (ii)** An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.
 - (j)** An assessment of each identified potentially significant impact and risk, including—
 - (i)** Cumulative impacts;
 - (ii)** The nature, significance and consequences of the impact and risk;
 - (iii)** The extent and duration of the impact and risk;
 - (iv)** The probability of the impact and risk occurring;
 - (v)** The degree to which the impact and risk can be reversed;
 - (vi)** The degree to which the impact and risk may cause irreplaceable loss of resources; and
 - (vii)** The degree to which the impact and risk can be mitigated.



Signatories of the Petition

To date 114 objectors to the Boulders Wind Farm in support of the above comments are;

<i>fagvisser@gmail.com</i>	<i>info@weskus.com</i>	<i>npitcher@truworths.co.za</i>
<i>maryralphs@mweb.co.za</i>	<i>hy-tech@mweb.co.za</i>	<i>Welma.Nicolson@absa.africa.com</i>
<i>ernst@iccgroupp.co.za</i>	<i>kirstenboerdery@yahoo.com</i>	<i>theominne@gmail.com</i>
<i>nichtererna22@gmail.com</i>	<i>sansley@westcoastmail.co.za</i>	<i>juniedv@gmail.com</i>
<i>andrew@gelukkie.co.za</i>	<i>h.vdberg@me.com</i>	<i>pottersrestpaternoster@gmail.com</i>
<i>deonb@bassonblackburn.com</i>	<i>zabethvdwm@gmail.com</i>	<i>roger@bfcc.co.za</i>
<i>jdmcoetzee@gmail.com</i>	<i>westbrookd3@gmail.com</i>	<i>bpickford59@gmail.com</i>
<i>meiring@bfstax.co.za</i>	<i>mias.nieuwoudt@gmail.com</i>	<i>andries.scheepers@sap.com</i>
<i>anita@telkomsa.net</i>	<i>mvanderm71@gmail.com</i>	<i>tertius@marais.co.za</i>
<i>elbecifiers@gmail.com</i>	<i>klauspsotta@telkomsa.net</i>	<i>duplessism@ampath.co.za</i>
<i>mike@occuvision.com</i>	<i>Ensa@dotthet.co.za</i>	<i>jdmcoetzee@gmail.com</i>
<i>pieterb@bidpaperplus.co.za</i>	<i>cneergaard@hotmail.com</i>	<i>dehoekie@telkomsa.net</i>
<i>shirley.ard@gmail.com</i>	<i>daniel.pikkie57@gmail.com</i>	<i>Anton.Rauch@psg.co.za</i>
<i>rossmclean10@gmail.com</i>	<i>marina.enslin@seeff.com</i>	<i>hilton@pawssa.co.za</i>
<i>ronell@weskaapbakwerke.co.za</i>	<i>deirdre@voyageyachts.co.za</i>	<i>francoisgwelgemoed@gmail.com</i>
<i>tom@voyageyachts.co.za</i>	<i>sypanthera@me.com</i>	<i>allan@bandcagri.co.za</i>
<i>ladylawsonanna@yahoo.com</i>	<i>vosloo.bekker@gmail.com</i>	<i>shanejvr@gmail.com</i>
<i>duplessism@ampath.co.za</i>	<i>suemelck@gmail.com</i>	<i>nkilalh@gmail.com</i>
<i>acairns001@telkomsa.net</i>	<i>Danie.vanTonder@rmb.co.za</i>	<i>june.perrett@pamgolding.co.za</i>
<i>ingridt13@gmail.com</i>	<i>iwilkins@mweb.co.za</i>	<i>johanmeyer3@me.com</i>
<i>marion@farout.co.za</i>	<i>tanyak@msct.co.za</i>	<i>ianchalkin@gmail.com</i>
<i>eat@gai'tjie.co.za</i>	<i>martin.treadaway@gmail.com</i>	<i>esley@effectivelirishes.co.za</i>
<i>laynivs@icloud.com</i>	<i>sehm@global.co.za</i>	<i>p.ranwel@mweb.co.za</i>
<i>ianch@globalhope.org.za</i>	<i>camillanichter34@gmail.com</i>	<i>maryralphs@mweb.co.za</i>
<i>wkritzer@yahoo.com</i>	<i>elmarie1.els@gmail.com</i>	<i>johurst31@gmail.com</i>
<i>robsmailes@yebo.co.za</i>	<i>info@thesquarespoon.co.za</i>	<i>bloubergvetcc@gmail.com</i>
<i>kiddiescollege@gmail.com</i>	<i>deonbrand@yahoo.com</i>	<i>johan@snymandebt.co.za</i>
<i>dwentz1948@gmail.com</i>	<i>slabigh@gmail.com</i>	<i>wj@cornergate.com</i>
<i>paul@paternosterbrew.co.za</i>	<i>johand@mtrloaded.co.za</i>	<i>kerih@icon.co.za</i>
<i>diehoekie@telkomsa.net</i>	<i>eddie.nieuwoudt@gmail.com</i>	<i>pieterb@bidpaperplus.co.za</i>
<i>dheesomgreen@gmail.com</i>	<i>rinawenhold@gmail.com</i>	<i>iancmac@hotmail.com</i>
<i>deon@farout.co.za</i>	<i>philip@jhblank.co.za</i>	<i>pieterb@bidpaperplus.co.za</i>
<i>manager@sphoa.co.za</i>	<i>j.tonder@atair.co.za</i>	<i>hesterb@bassonblackburn.com</i>
<i>karlheinz.berthold@gmail.com</i>	<i>coachinglab@me.com</i>	<i>Adri@privatedient.co.za</i>
<i>kackermann@yahoo.com</i>	<i>paternoster@absamail.co.za</i>	<i>riel@profileeeds.co.za</i>
<i>gabydunn@gmail.com</i>	<i>orlando@anjaspantry.co.za</i>	<i>manager@sphoa.co.za</i>
<i>bpickford@gmail.com</i>	<i>tania.scherman@gmail.com</i>	<i>Mari.vanderWesthuizen@mazars.co.za</i>
<i>lerj6971@gmail.com</i>	<i>carlap@absamail.co.za</i>	<i>tertius@marais.co.za</i>

2 respondents did not object to the Boulders Wind Farm and did not support the above comments:

ben@thejcs.co.za

fanie@radionet.co.za

a Number of interested ratepayers on the mailing list did not receive the above comments, neither did we receive all replies. We therefore make the statement that the reaction, if better coordinated, is going to be even more convincingly in opposition.



In addition please find a petition with 38 signatures also opposing the Boulders Wind Farm

PETISIE TEEN BOULDERS WINDPLAAS - PETITION AGAINST BOULDERS WIND FARM

DEA project reference number 14/12/16/3/2/1057

NAAM NAME	Epos Email	Telefoon/ Sel Telephone /Cell	BESIGHEID BUSINESS	Aantal werknemers No of employees	Handtekening Signature	Hou my op hoogte Keep me updated
RRR. S. NARISO	sunrisec@live.nl.za	082 085 0721				✓
HR. H. BRESLER	hrb@freesat.net	082 278 5472	Apogee			✓
B.A. PETERSEN	B.A.Petersen@freesat.net	082 278 5472	Potters 2417	3		✓
Prof. J. Scherman	j.scherman@uct.ac.za	082 235 7057	47 Middelburg Str	2		✓
T. NARAS	info@naras.co.za	072 609 812	B. Schuurman Rd	2		✓
D. BALSABROCK	dearbalsabrock	0834025778	13 Schuurman Rd ST	2		✓
S. BIRCH	S.birch@afica.com	0834001784	9 KOCHAAN	1		✓
A. KUNDELI	makunda@kunda.com	082 66 98 702	MANIE ST.	2		✓
Annaes Mostert	annaesmostert@qmail.com	082 4 455 270	4 Jacobslip	2		✓
D. K. Mostert	orkunde@k.sturz.com	082 449 0715	6 Jorden Klip	2		✓
V. Hellewell	vanhellewell22@gmail.com	0725816753	10 Kelders	2		✓
O. Rossouw	rossouwof@qmail.com	082 540 3460	3 Malack	1		✓
L. Gray	roncgray@qmail.com	0763244309	15 Versanger	1		✓
R. Gray	roncgray@qmail.com	0727677215	15 Versanger	1		✓
M.A. Bousman	bousman@kwa.com	071 304 2671	13 Versanger	1		✓
Wilma Kruger	wilma@yab.com	0722764510	Ciro	1		✓
Jane de Villars	jurisd@qmail.com	082 66 9480	Marcel Floss	1		✓
Conrad Botha	conrad@botha.com	071 264 1527	Triloka Park	2		✓
D. HOPKINS	deurdels@getnet.co.za	0825728	34 Quest Meer			✓
V. E. van der Merwe	vanmerwe@qmail.com	082 236 7795	Groenboom			✓
L. Vermeulen	lvermeulen@qmail.com	082 855 9472	Wolke Valley	2		✓
P. Breyerbach	p.breyerbach@qmail.com	082 872 6122	P. b. Cerameis	1		✓
O. Kow	owk@qmail.com	083404986	Sugar + Spice	2		✓
G. LOUW	george@gimscards.co.za	0834497020	Sugar + Spice	2		✓
M. Zinin	mzinin@pakistaner.com	0733227590	Stay in Pakistaner	9		✓
C de la Roste	clerost@delaroste.com	082 783 1508	Joune Ruffels	2		✓
S. ATTRILL	sattrill@y.co.za	082 416 600		2		✓
G. DUNN	gdunn@qmail.com	0824906778		2		✓
M. Hopkins	SY.Park@qmail.com	0825188315	Green Lawn	1		✓
M. RISSON	info@heademont.com	082 286 2835	TRINITY	2		✓
M. Louper	madelen.louper@cloud.com	078 286 2835	Milk Mayretye	2		✓
G. Schrader	g.schrader@qmail.com	071 281 451	Stay in Pakistaner	8		✓
F. Hopman	frank.hopman@qmail.com	071 326 5075	Stay in Pakistaner	8		✓
J. Pectro	janis@pectro.com	071 365 2931	Stay in Pakistaner	2		✓
B. Moller		082 955 2078		2		X
S. van Zyl	shirvan@zyl.com	071 449 3772	Stay in Pakistaner	8		✓
A. Oesterbaai	oesterbaai@family.com	0824152837	Hedley			✓
K. HARVEY	kenharvey@qmail.com	0832524174	trouwen	1		✓