

**FINAL ENVIRONMENTAL IMPACT ASSESSMENT  
REPORT**

**Boulders Wind Farm**

**Vol. 4**

**APPENDIX F-5**

**Proofs of submissions received  
from Farmers and Other I&APs &  
Petitions (cont.)**

September 2019







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## PROOFS OF SUBMISSIONS RECEIVED FROM I&APs

### Petitions

#### *NoWindFarms for Paternoster*

1 and 2 July

The below comments were received via email from 31 respondents whose names and relevant designation within the community are provided in the table which follows.

#	Name	Designation
1	Alan Duncan	Homeowner
2	Andries scheepers	Homeowner
3	Charles Griss	Homeowner
4	Charlotte Baker	Very Regular Visitor
5	Cheryl de Porte	Homeowner, business Owner
6	Christiaan Lodewyk Wentzel	Permanent resident
7	Chris Wilkin	Regular Visitor
8	Christo Terblanche	Homeowner
9	Cleo Groenewald	Homeowner
10	Colette van der Merwe	Homeowner
11	Ernesta Van Deijl	Homeowner
12	Esti Du Plessis	Homeowner
13	Frances Hepbur	Resident & employee at tourism based business
14	Frederick Johanness Wessels	Homeowner
15	Hannes Jacobus Kleynhans	Resident, homeowner, business owner
16	Jacques Sherman	Homeowner
17	Jerry& Debbie Van Rooyen	Resident homeowner
18	Kenneth & Carla Pattison	Homeowner
19	Laura Jacke	Regular Guest
20	Leon Lubbe	Homeowner
21	Margeurite du Preez	Homeowner
22	Marion Lubitz	Farr Out Guest House
23	Marlene Anderson	Resident and guest house owner
24	Mr KH Bresselschmidt	Homeowner
25	Mrs Mariana Scherman	Regular visitor
26	Paul Vorster	Homeowner
27	Peggy Lannon	Resident/homeowner/business owner
28	Prof Dr Sudeshni Naidoo	Homeowner
29	Simone Jacke	Hotel Owner
30	Tertius Marais	Guest House Owner & Property Investor
31	Tamasine and Phil Ramwell	Owner/Residents



NO

BOULDERS

WIND

FARM

## COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT

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 in Paternoster**, who have invested in this very successful village. 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 owners, have invested in the success of Paternoster, but 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.



- 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

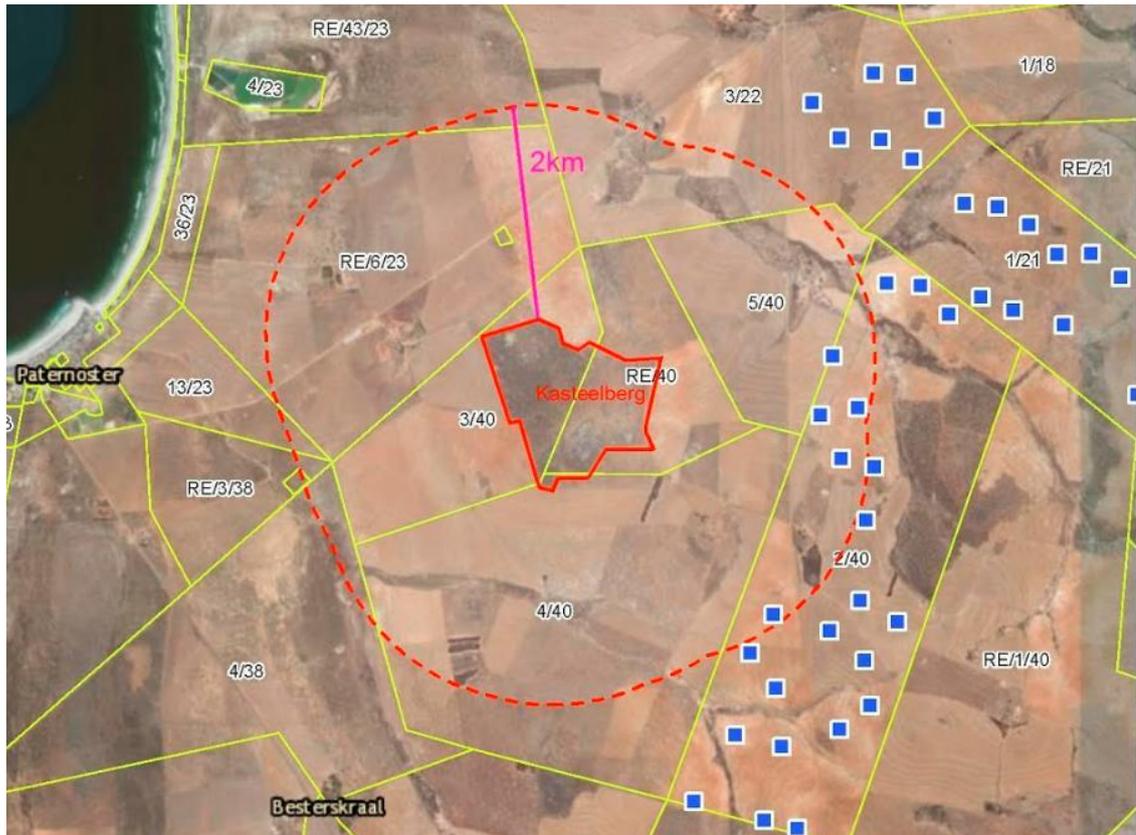


spoiled by the Boulder project. *The Integrated Heritage Impact Assessment and Assessment of Economic Impacts* both refer to the importance of Vredenburg-Stompneus Bay and Paternoster- Stompneus Bay roads but totally ignore the historic, scenic and visual qualities of the Vredenburg-Paternoster Road, 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 m<sup>2</sup> 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 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.



#### HERITAGE IMPACT

- According to Klein & Cruz-Urbe 1989; Smith et al 1991 there is to be no development/change to this heritage 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 a heritage site.



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.
- **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 the Boulders proposal. 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 effect.

#### 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 IS2 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 and is not water dependent and is not dependent on sun or wind.



- The fact that **wind conditions are less favourable during winter** (when demand is highest) means that Escom 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?
- **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 magnitude are still in the beginning stage of development.
- 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.
- 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

- There is a perception 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– please note the earlier condition under Heritage Impact.
  - Elru -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.**

*Section 2 of NEMA contains principles (see Table 4-1) 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**

<b>(2)</b>	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.
<b>(3)</b>	Development must be socially, environmentally and economically sustainable.
<b>(4)(a)</b>	Sustainable development requires the consideration of all relevant factors including the following: <ul style="list-style-type: none"> <li>i. That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;</li> <li>ii. That pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;</li> <li>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.</li> </ul>
<b>(4)(e)</b>	Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle.
<b>(4)(i)</b>	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.
<b>(4)(j)</b>	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.
<b>(4)(p)</b>	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.
<b>(4)(r)</b>	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.



Britannica Heights Petition of 106 People

**PETITION TO THE MINISTER OF ENVIRONMENTAL AFFAIRS REGARDING BOULDERS WIND FARM**

I, the undersigned, am aware of the proposed Boulders Wind Farm on the West Coast Peninsula, including its supposed benefits and potentially negative impacts. I am also aware that the proposed Boulders Wind Farm will offer the local community no relief from Eskom tariff increases or local power outages, nor will it employ a significant number of people beyond the two-year construction phase.

I am of the opinion that the impact of the proposed Boulders Wind Farm, combined with the existing West Coast 1 Wind Farm, will have many long-term negative social, economic, environmental and aesthetic impacts for our community, and that these far outweigh any benefits.

The West Coast Peninsula is a unique part of our country that is increasingly driven by a rapidly growing tourism and hospitality industry. If Boulders Wind Farm is approved, its giant turbines will dominate the landscape. Tourists will choose to go elsewhere and the hospitality sector will suffer a major loss of income. Retrenchments are likely and thousands of jobs that could have been created will never exist.

I hereby register my opposition to the Boulders Wind Farm and associated infrastructure, and I encourage the developer, Saldanha Bay Municipality and the national Department of Environmental Affairs to propose alternative sites where the negative impacts are much reduced while the positive ones are retained.

	Name	Suburb/town	Tel/cell number	Signature	Keep me updated: Y/N
1	ANN TROMP	LANGEBAAN	073 184 6020	<i>[Signature]</i>	Y
2	PATTY COLLETON	AURORA	084 639 0310	<i>[Signature]</i>	Y
3	Delene du Plessis	Dwarskloppers	082 672 9008	<i>[Signature]</i>	Y
4	Valle McDonald	Dwarskloppers	084 680 2655	<i>[Signature]</i>	Y
5	A.M. STEWART	HOTEFIELD	072 3866360	<i>[Signature]</i>	Y
6	G.M. STEWART	KOPEFIELD	072 7366673	<i>[Signature]</i>	Y
7	PIPPA HAARTHOFF	LANGEBAAWEG	083 2896902	<i>[Signature]</i>	Y
8	MARGOT HARPER	S.H. BAY	064-9627014	<i>[Signature]</i>	Y
9	Fiona E. Gomes	S. Helena Bay	082 7127451	<i>[Signature]</i>	Y
10	DESIRÉE CIBSIO	S Helena Bay	0849229782	<i>[Signature]</i>	Y

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

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	Name	Suburb/town	Tel/cell number	Signature	Keep me updated: Y/N
11	C.J. BLAKE	hangebaan	076807 8240		Y
12	R. HARRISON	Vredenburg	022-7133026		Y
13	W. van Ryswyck	hangebaan	—	— (W. van Ryswyck)	Y
14	Alste v.d. Linde	Veldhof	022 783 0834		N.
15	N. McLean	Vaalkop	0845862 689	N. McLean	Y
16	V. Ward	Jacobsbaai	082 771 9622	V. Ward	Y
17	G. RICHARDS	Rangebaai	083 2737162		Y
18	C. Mendelow	Langebaai	084 44 99302		Y
19	B. Mendelow	"	082 8978117		N.
20	P. Sutton	Jacobsbaai	082 574 4647	PP P. Sutton	N



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	Name	Suburb/town	Tel/cell number	Signature	Keep me updated: Y/N
21	R. Roefs	Langebaan	0730847262		Y
22	H. Whiteman	BRITANNIA BAY	0829517429		Y
23	M. DUFFIELD	ST HELENA	0731725917		Y
24	G. WHITEMAN	BEIT. BAY	082 8053652		Y
25	M. van Rouwen	Vredenburg	0932614200		Y
26	K. HARRISON	Vredenburg	022-7133026		Y
27	M. Bezuidenhout	Jacobsbaai	0844862736		Y
28	A. Hoogenboezem	Vredenburg	0844034151		Y
29	D. van Rijswyck	Langebaan	082 923 1594		Y
30	M. J. Roefs	WEST COAST	0229581669		Y



### PETISIE AAN DIE MINISTER VAN OMGEWINGSAKE MET BETREKKING TOT BOULDERS WINDPLAAS

Ek, die ondergetende, is bewus van die voorgestelde Boulders Windplaas ontwikkeling op die Weskus Skiereiland, insluitende die veronderstelde voordele en potensiële negatiewe impak daarvan. Ek is ook bewus dat die windplaas nie aan die plaaslike gemeenskap verligting sal verskaf van ESKOM tariefverhogings of plaaslike kragonderbrekings nie. Dit sal verder ook nie werk verskaf aan meer as 17 mense na die twee-jaar konstruksiefase nie.

Ek is van die opinie dat die gekombineerde impak van die voorgestelde Boulders Windplaas met die bestaande een 'n baie negatiewe sosiale, ekonomiese, omgewing en estetiese impak op ons gemeenskap sal hê wat die voordele daarvan by verre sal oorskry.

Die Weskus Skiereiland is 'n unieke deel van ons land wat gedryf word deur toerisme en die gasvryheidsindustrie.

Hierdie besighede, die vakansiegangers en die konstruksie-industrie sal nie bevoordeel word deur 'n verdere windplaas nie, maar sal eerder verliese ly as gevolg daarvan.

Ek registreer hiermee my teenstand teen die Boulders Windplaas en gepaardgaande infrastruktuur en ek moedig die ontwikkelaar, Saldanha Munisipaliteit en die Nasionale Departement van Omgewingsake aan om alternatiewe areas voor te stel waar die negatiewe impakte minder sal wees terwyl die positiewe impak behoue sal bly.

Naam	Woonbuurt	Tel/selnommer	Handtekening	Hou my op hoogte: J/N
1 M. Zeelie.	Doffmarbaai	022 742 1590		N.
2 F. Coetzee	SHELLEY POINT	079 372 9225		J.
3 L. Coetzee	SHELLEY POINT	07 11 405 475		J.
4 W. Puaak	CAPE ST MALDEN	083 653 9708		J.



### PETITION TO THE MINISTER OF ENVIRONMENTAL AFFAIRS REGARDING BOULDERS WIND FARM

I, the undersigned, am aware of the proposed Boulders Wind Farm on the West Coast Peninsula, including its supposed benefits and potentially negative impacts. I am also aware that the windfarm will offer the local community no relief from Eskom tariff increases or local power outages, nor will it employ a significant number of people beyond the two-year construction phase.

I am of the opinion that the impact of the proposed Boulders Wind Farm, combined with the existing one, will have many negative social, economic, environmental and aesthetic impacts for our community, and that these far outweigh any benefits.

The West Coast Peninsula is a unique part of our country that is increasingly driven by tourism and the hospitality industry. These businesses, holidaymakers and the local construction industry will not benefit from placing a further wind farm in such close proximity to the existing one and will suffer a major loss of business as a result.

I hereby register my opposition to the Boulders Wind Farm and associated infrastructure, and I encourage the developer, Saldanha Municipality and the national Department of Environmental Affairs to propose alternative sites where the negative impacts are much reduced while the positive ones are retained.

Name	Email	Tel/cell number	Business name/sector	Total no. of employees (regular and casual)	Signature	Keep me updated: Y/N
1 WALDMAN JORDAAN	JORDAAN.BUSINESS@GMAIL.COM	0825505500	OWNER OF AFFECTED PROP. ESTATE AGENT	1		Y
2 Meka	meka03@yahoo.com	0838436902	Resident.	1		Y
3 J. CRONJE	JOHANNL1@GMAIL.COM	0836353359	RESIDENT Plot 1787	1		Y
4 T. CRONJE	SAME AS ABOVE	0832261572	RESIDENT PLOT 1787	1		Y
5 M. RALPHS	maryralphs@murch.co.za	0227175594	Resident	1		Y
6 C. Saunders	cheryl@gmail.com	0722830566	Resident	-		Y
7 P. Saunders	" "	0791613022	Resident	-		Y
8 J. ERASMUS	-	0827513298	RESIDENT.	-		Y
9 E. Ware	ronelmore@yahoo.co.uk	0845632524	Resident	2		Y

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PETITION REGARDING BOULDERS WIND FARM

	Name	Email	Tel/cell number	Business name/sector	Total no. of employees (regular and casual)	Signature	Keep me updated: Y/N
11	Anna Todd	toddbat@iafrica.com	083 650 9717	Resident	-	A-Todd	Y.
12	MATTHEW MARX	marxem@web.co.za	022 792 1309	RESIDENT	-	MARX	Y
13	Ronel Woir	dagomascottage@gmail.com	086 563 2527	da Gomas Cottage self-catering	2	RWoir	Y
14							
15							
16							
17							
18							
19							
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21							
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Name	Email	Tel/cell number	Business name/sector	Total no. of employees (regular and casual)	Signature	Keep me updated: Y/N
1 GAYNOR PORTSMOUTH	helle@hiltophideaway.co.za	074 217 6968	HILTOPHIDEAWAY VENUE/WEDDINGS/TOURISM	1	<i>Helle</i>	Y
2 Doug PORTSMOUTH	doug@portsmouth	072 143 9106	Resident	-	<i>Doug</i>	Y
3 Julie Coetsee	juliecoetsee@gmail.com	060 900 6610	Resident	-	<i>Julie</i>	Y
4 Pam Duffield	duffield.pamela@gmail.com	023 702 1978	Res	-	<i>Pam</i>	Y
5 Sandy Hunt	sandyh@hills.com	022 666 5510	NA	-	<i>Sandy</i>	Y
6 CHRISTA BOTHA	christa.botha@gmail.com	073 954 7500	Resident	-	<i>Christa</i>	Y
7 FREDY NEBBOT	fredy@eguzul.com	012 408 5531	Visitor (Family Resident)	-	<i>Fredy</i>	Y
8 John Todd	toddj2@africa.com	083 659 8383	Resident	-	<i>John</i>	Y
9 Annelie Engels	annelieengels@gmail.com	082 658 6599	Resident Britannica Heights	-	<i>Annelie</i>	Y
10 Louis Engel	lrengels@mweb.co.za	082 966 8008	"	-	<i>Louis</i>	Y

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PETITION REGARDING BOULDERS WIND FARM

Name	Email	Tel/cell number	Business name/sector	Total no. of employees (regular and casual)	Signature	Keep me updated: Y/N
11 Berna	berna@wo.co.za	079052907			Berna	N
12 P. Sima	GARTH@ANTCOLL.CO.ZO	0845781155			[Signature]	N.
13 N. Sima	NAOS@ANTCOLL.CO.ZO	0849539823			[Signature]	N
14 P. Potgieter	paulejpc@energy.net	0734556648			[Signature]	Y
15 P. Potgieter	"	0737305468			[Signature]	Y
16 N. Louder	nialanlouder@6304.com	07646235			[Signature]	Y.
17 M. Griffith	menzgriffine@gmail.com	084407464			[Signature]	
18 T. BETZ	trishwoodward2018@gmail.com	0826624470			[Signature]	YES.
19 W. Woodward	w.woodward2018@gmail.com	"			[Signature]	YES.
20 A. Masteri	azmos.jb@gmail.com	0836514572			[Signature]	NO
21 S. Pool	"	"			[Signature]	NO
22 J. David		0825671059				N
23 W. Wilson	westcoastcactus@gmail.com	0837633942			[Signature]	N
24 M. Brin	brann.cross@gmail.com	0715291115			[Signature]	Y
25 L. Brin		0785402675			[Signature]	Y

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



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Name	Email	Tel/cell number	Business name/sector	Total no. of employees (regular and casual)	Signature	Keep me updated: Y/N
1 A.M. ADENDORF		082 309 6453	RETIRED	-	<i>[Signature]</i>	Y
2 B.M. Adendorf		0729962060	Country Cabin s/a.	-	<i>[Signature]</i>	Y
3 M. Pezzer		082 6923478	Retail	-	<i>[Signature]</i>	Y
4 S Olive	susan.olive@gmail.com	0726994161	Retired		<i>[Signature]</i>	✓
5 T.L. THEDET	theresa.thb@gmail.com	083 5158006	Ind. Pract.	-	<i>[Signature]</i>	Y
6 C Pretorius	ciclie@waw.co.za	0733507142	St Helena Centre	20	<i>[Signature]</i>	Y
7 I. Hey		082 9012374	Retired.	-	<i>[Signature]</i>	✓
8 T. Danton		0711857498	Retired	-	<i>[Signature]</i>	Y
9 EDUARDUS	elmoniedupe8@gmail.com	081 270 2035	SELF EMPLOYED	-	<i>[Signature]</i>	N
10 SCHRISTEN		0825779505	Shelky Point Oystercatcher lodge		<i>[Signature]</i>	✓

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## Farmers/ Land Owners

*Heydenrych Pierre*

Ek wil graag die volgende kommentaar lewer op BOULDERS WINDFARM se Omgewingsproses: MY AGTERGROND: Ek die skrywer boer al die afgelope 50 jaar in die omgewing.

I want to provide the following comments on the BOULDERS Windfarm's Environmental Process: MY BACKGROUND: I the writer am farming for the past 50 years in the area.

Ek is gebore op die plaas waar ek tans boer. Ek is een van die grootste belastingbetalers in die omgewing en is net so geregtig om ekonomiese geleenthede te benut soos almal.

I was born on the farm where I am currently farming. I am one of the biggest/largest tax payers in the area and am just as entitled to the utilisation of economic opportunities as everyone else.

Ek het al meer grond afgestaan aan die gemeenskap van Paternoster as enige ander persoon.

I have been giving more land to the community of Paternoster than any other person.

Ek is meer vertrouwd met die omgewing as enige inwoner en veral die beswaarmakers.

I am more familiar with the environment than any other resident and especially than the people objecting.

BOERDERY Net 'n kort opsomming, dit dit raak vir my onmoontlik om hier onder normale praktyke verder te boer daarom het ek dit goed gedink om my na alternatiewe soos Windenergie te wend nadat ek genader is deur die instansie oor die goeie "windmetings" wat hier gedoen is.

FARMING Just a short summary, it becomes impossible for me to under normal practice farm any further hence me considering alternatives such as Wind energy after I have been approached by the institution/company regarding the good 'wind measurements' that was done here.

Ek word blootgestel aan ernstige veediefstal en honde vanaf Paternoster en omgewing wat my skape vang en verskeur van onbeheerde eienaars.

I am especially exposed to serious livestock theft in the area and dogs from Paternoster of owners not controlling them, that catches my sheep and rip them apart.

Dit is alombekend dat aardverwarming besig is om 'n baie groot rol by ons omgewing te speel en dus 'n baie groot impak op my Boerdery omstandighede te hê.

It is well known that global warming are playing a very big role in our environment and that it has a huge impact on my Farming circumstances.

Omdat ek hier gebore is kan ek sien hoe die reënval al minder raak en hoe die seevlak styg.

Because I was born here, I can see how the rainfall are getting less and how the sea level are rising.

Dit wil vir my voorkom asof plaaslike Boerdery gestaak moet word om hulle wil af te dwing, ek kan ongelukkig nie hiermee saamgaan nie.

It appears to me that local Farming has to be stopped to force their will on to it, I can unfortunately not go with this.

TOERISME Die sogenaamde toerisme waarvan daar so baie opspraak gemaak word is besig om stadig maar seker ons infrastruktuur te vernietig as gevolg van toeloop van mense in die omgewing.

TOURISM The so called tourism of which so much hype is made of, is slowly but surely busy destroying our infrastructure as a result of the volume of people to the area.

Toerisme lewer geen bydrae tot my Boerdery nie. Ek moet daagliks drade en paaie instand hou as gevolg hiervan.



Tourism adds no value to my Farming. I have to maintain fencing and roads on a daily basis as a result.

Ek moet mense inspan om vuilgoed (plastieksakke) wat op my lande waai op te tel, want as 'n bees of skaap 'n plastieksak kry sal hy hom vreet en daaraan doodgaan.

I have to allocate people to pick up plastic bags blowing on to the land, because if cattle or sheep get hold of plastic and eat it, they will die.

Drie jaar terug het ek byna R300 000 verlies gehad van onbeheerde rondloperhonde van inwoners sowel as toeriste se honde wat my skape gevang en verskeur het.

Three years ago I nearly had R300 000 worth of loss as a result of uncontrolled stray dogs of residents as well as tourists' dogs that caught my sheep and killed them.

Dit was so erg dat die SABC 'n program daarvoor gemaak het en dit op Fokus uitgesaai het.

It was so bad that SABC made a programme about it and it was broadcast on the 'Focus' programme.

Geen inwoner of Toeris het my as Boer probeer help of probeer bystaan deur dit nie.

No resident or Tourist tried to help or support me as a Farmer; through this.

Die aansoek van die nuwe Windplaas is slegs 'n uitbreiding van die bestaande Windplaas en kan ek nie sien waarom die beswaar makers so besorg is nie, want die bestaande Windplaas het geen invloed op die inwoners van Paternoster en omgewing nie, en in ander dorpe wêreldwyd en in Suid-Afrika word dit reg langs dorpe gevestig.

The application of the new Windfarm is only an extension of the existing Windfarm and I cannot see why the complainants would be so concerned, as the existing Windfarm has no influence on the residents of Paternoster or environment, and in other towns all over the world, and in South Africa, it is established right next to towns.

Dit is vir my onregverdig teenoor my om deur Paternoster- en omgewing se inwoners te besluit waarmee ek mag boer of nie.

For me it is unfair towards me, to be decided by Paternoster and environment/area's residents of what I am allowed to farm with or not.

Die inwoners van veral Paternoster is onder die indruk dat Paternoster en omgewing te "gesog" is vir 'n Windplaas, daar is baie ander toeriste dorpe wat ook Windplase het en dit het geen effek nie.

The residents of especially Paternoster is under the impression that Paternoster and area are too prestigious for a Windfarm, there are many other tourism towns that also have Windfarms and it has no effect.

Die verhoogte toerisme in Paternoster speel 'n belangrike rol in die vernietiging van plantegroei ensv. Hier word meer diere soos bokkies, jakkalse, voëls en eende doodgery as wat enigiets anders kan skade doen.

The increased tourism in Paternoster plays an important role in the destruction of vegetation etc. We have more animals such as buck, jackal, birds and geese as road kill than anything else that could do harm.

Ek patroleer die paaie tussen my plase meer as enigiemand in hierdie omgewing daagliks en is seker van my feite wat ek stel, en word hier nie goed uit my duim gesuig soos die beswaarmakers nie.

I patrol the roads between my farms more than anyone else in the vicinity on a daily bases to be sure of the facts that I state, and therefore do not thumb suck as with the opposers.

ALGEMEEN Gegewe die agtergrond waar die aansoek twee keer deur inwoners probeer stop is, deur die sabotering van die proses is dit vir my duidelik dat dit 'n PERSOONLIKE agenda is, want die Department het by twee geleenthede die besware opgehef.

GENERAL Given the background where the application were attempted to be stopped by the residents, two times, by the sabotaging of the process, it is clear to me that it is a PERSONAL agenda, because the Department had at two occasions lift the objections.

Ek kan myself nie insien waarom die projek nie moet voortgaan nie.

I cannot see why the project should not go ahead.

Ek was by twee van die huidige inligtingsvergaderings bygewoon, en die besware wat geopper is blyk definitief na 'n PERSOONLIKE agende en dra dus geen objektiewe feite vir die kansellering van die projek nie.



I have been present at two of the current information meetings, and the objections that were made definitely seem to be PERSONAL agendas and therefore carry no objective facts for the cancellation of the project.

Dieselfde persone wat ek opgemerk het by die vergaderings is dieselfde persone wat voortdurend beswaar maak met wat ek ookal wil doen of beplan hetsy ontwikkeling of hersonering van grond ensv.

It is the same people I have seen at the meetings who continuously makes the objections with whatever I want to do or plan whether it be development or rezoning of land etc.

Sommige van die beswaarmakers is nie Suid-Afrikaanse Burgers nie en sommige nog nie eens 2 jaar inwoners nie.

Some of the 'objectors' are not South African citizens, and some not even residents for 2 years yet.

Die belastingbetalers en inwoners is gou om oor kleinighede besware te opper, maar ek vra die volgende:

The tax payers and residents are quick to object to minor issues, but I ask the following:

- Drie jaar terug het ek R300 000 verloor met honde wat skape vang en niemand het my probeer help nie.

- Three years ago I lost R300 000 with dogs catching my sheep and nobody attempted to help me.

- Niemand doen iets oor die wettelose steel van my vee en die knip van my drade nie.

- Nobody did anything about the lawless theft of my small stock and the cutting of my fencing.

-Hoekom word die internettorings nie verwyder wat sonder 'n EIA gedoen is nie.

-Why do the internet towers not get removed which were done without EIA's?

-Hoekom reageer hulle nie oor onwettige bou van geboue in Paternoster nie?

-Why do they not react to the illegal construction of buildings in Paternoster?

- Hoekom reageer hulle nie oor onooglike warmwater silinders wat aangerig is op RDP huise nie?

- Why do they not react on unsightly warm water cylinders that were constructed on RDP houses?

Dit wil vir my voorkom asof die beswaarmakers plaaslike Boerdery wil staak om hulle sin te kry. Ek kan ongelukkig nie hiermee saamgaan nie.

It appears to me as if objecting people wants to stop local farming to get their way. I can unfortunately not agree with this.

Ek glo aan 'n ordelike en wetlike proses wat gevolg moet word, maar daar word gedurig ingemeng deur oningeligte inwoners deur 'n verkeerde gesindheid te openbaar voordat hulle al die feite het.

I believe in an orderly legal process to be followed, but there are continuous interference by uninformed residents through an incorrect attitude displayed before they have all the facts.

Hierdie projek gaan 'n baie groot ekonomiese inspuiting bring vir die plaaslike omgewing, asook vir die plaaslike Gemeenskap, wel by die oprigting en permanete basis.

This project will bring a very big economical injection for the local environment, as well as for the local Community, at the construction and permanent basis.

Die huidige kragstudasie in Suid-Afrika is geen geheim nie en die Regering se beleid om trent skoon energie.

The current electricity situation in South Africa is no secret and the Government's policy around clean energy.

Die Kaapste Metro is besig met 'n hofsak om Eskom te verplig om direk by onafhanklike kragvoorsieners krag aan te koop.

The Cape Metro is currently busy with a court case to obligate Eskom to directly purchase electricity from independent power suppliers.

Ek wil graag op rekord plaas dat enige sinnelose vertraging wat veroorsaak word deur die beswaarmakers wat ge-opper word met 'n eis vir skadevergoeding indien ons onregverdig verdrag word met die Windplaas projek.



I want to place on record that any senseless delay that are caused, by objecting people, that are raised, will result in a damage claim in case we are unfairly delayed with the Wind Farm Project.

Ek vertrou dat my inset as positiewe bydrae tot die bevestiging van hierdie broodnodige SKOON ENERGIE projek sal wees.

I trust that my input will be a positive contribution to the confirmation of a much needed CLEAN ENERGY project.

### Other Residents around the Peninsula

*Kotze Danie*

Boulders Wind Farm

30 June 2019

This is with regard to Boulders Windfarm with DEA Reference number 14/12/16/3/3/2/1057

I have the following comments and concerns.

#### 1. Visual and Noise Impacts:

The West Coast One Wind Farm is situated nearby and the closest wind turbines to my house is 2.4 km. When the dominant wind from the southeast or east are blowing the swoosh sound from the turbine blades can be heard very easily.

The shadow flicker during the day and night flickering of the lights would definitely be a disturbance, but the effect thereof cannot be determined, because I have not lived closer than 2.4 km from a turbine before?

I do not know if the close proximity of the proposed turbines would cause sleep disturbance for my family or farm workers or not?

The residents of Klipheuwel farm (part of the West Coast One WEF) was evacuated due to noise and visual impacts.

Why do the residents of Brittanica Heights and Paternoster have the right to decide that the visual and noise impacts from the proposed windfarm would be disturbing and that the developer mitigated the layout to support this, but my family and farm workers don't?

The people living close or nearby turbines are generously compensated by income from the wind turbines on their property, but my family and farm workers won't.

A buffer zone of 500 m from my house is definitely inadequate for visual and noise impacts for my family and farm workers.

#### 2. Water Resources:

We do not have natural water supplies and use mainly Municipal water, which was interrupted 4 times this year for 1 day or more.



Where will this project get its water from and how will it influence our supply?(This was not answered in DSR?)

Every December month our water supply is under great pressure because of the increase in consumption over the holiday period.

We are currently under heavy water restrictions, with increased water tariffs that causes higher inset costs.

We live in a low rainfall area and the past five years we are experiencing an ongoing drought that caused huge losses in income and we had to sell or reduce livestock to make ends meet.

In the DSR the Saldanha Bay Municipality clearly stated that a project of this scale not be approved at this time due to lack of water. (What happened about the fact that we are still experiencing restrictions due to the ongoing drought?)

I suggest that all building projects be cancelled till we can overcome this dreaded drought, that's the worst in 100 years.

### 3. Roads:

How will the gravel road from Vredenburg to Stompneusbay (P2160) be maintained, because it will carry heavy loads, many trucks and other vehicles involved in this project.

If not properly maintained who will be held responsible?

We already struggle with the West Coast District Municipality to maintain the road, which are 95% of the time in a horrible condition.

Our vehicles get a beating on these roads every day as it is and no one takes responsibility for the damages.

The WCDM do not have the funds to maintain this road, according to them, and how will this be overcome?

### 4. Security:

This is a big concern because my farming activities mainly consist of Sheep and Cattle farming and we already have a big problem with theft of livestock.

The proposed windfarm will have security at the entrances of the farms included in the project, but we as neighbours won't .

How will we be protected against the rise in activity and unknown people claiming to be part of the project.

At night who will be responsible for securing my livestock and assets?

If any livestock loss or theft occur by workers or contractors from the proposed development, Boulders Windfarm will be held responsible

### 5. Heritage:

I have a Heritage resource on my farm (KBS) Kasteelberg and there are a 3.5 km no wind turbine buffer zone around it set by Heritage Western Cape's CEO Mr. Andrew Hall on 2 November 2011 and no turbines within 2km on both Western and Eastern Side of the Stompneusbay gravel road(P2160) to protect sense of place of this Grade 2 Heritage site.



### 5.1. BackGround

If you are not aware, my farm Boebezaks Kraal 0/40 and 4/40 was part of The West Coast One Wind Energy Facility project but was excluded from the project due to a 3,5 km no wind turbine buffer zone around Kasteelberg (KBS) set by Heritage Western Cape (HWC Case Number 1152) and no turbines within 2km on both the western and eastern side of the Stompneusbay gravel road(P2160)

These heritage buffer zones resulted in my farm being excluded from the WEF resulting in a huge loss of income for me, my family and farmworkers.

### 5.2. History

During the EIA process and development of the West Coast One WEF (WC1 WEF), 19 turbines was placed on my farm on the lower slopes of Kasteelberg and to the Southern part of my farm.

The heritage specialists as part of the EIA process, recommended in the HIA, not less than 2km buffer zone around Kasteelberg and a 500 m buffer on both sides of Stompneusbay road.

These Heritage buffer zones resulted in less footprint for turbines on my farm and the remaining 12 turbines was placed on the southern part of my farm outside of Kasteelberg 2km and road 500 m buffer zones suggested by HIA specialists.

Heritage Western Cape (HWC) then commented on EIA on 3 November 2010 (attached please find HwcCommentonEIA.pdf) and recommended a NO GO option for the West Coast One WEF with the reasons stipulated.

The DEA somehow disregarded this comment by HWC and the Environmental Authorisation(EA) was granted on 13 March 2011 with the 2km buffer around Kasteelberg, with condition that the Heritage buffer zones be further discussed and agreed upon between WEF developer and HWC(please find WCOneAuthMarch2011.pdf) on page 14 and 15 (10.7.1 and 10.7.4).

HWC then appealed against Environmental Authorisation on 19 April 2011 (please find HWCAppealWC1.pdf) and in this document HWC clearly states reasons for the High Heritage Significance of Kasteelberg and the NO GO option for the WEF.

- a) The High Heritage Significance of the Kasteelberg Archaeological sites.
- b) Impacts of Sense of Place and Cultural Landscape.

The grounds for appeal was given on page 3 of this document and at the bottom of page 3 and top of page 4, HWC clearly states that 2 km buffer zone around Kasteelberg was inadequate and that a buffer of at least 5 km, possibly more should be placed.

The NO GO option for the West Coast One WEF was given by HWC.

This document was signed by CEO of HWC, Mr. Andrew Hall.



The developers of WC1 WEF and myself tried numerous times to persuade the CEO of HWC to reduce the 5 km buffer zone, by corresponding with HWC with no positive response. The WEF developers asked HWC if a mitigated layout of no turbines on western side of gravel road to Stompneusbay would be approved, but still no positive response from HWC.

On 14 September 2011 Kasteelberg was nominated as Provincial Heritage Site (PHS) due to its importance as Grade 2 Heritage site by HWC.

Me and my family was worried about security and asked for more information from HWC due to people visiting this PHS without our consent, with no reply from HWC.

At this stage the developers mitigated the layout of the WC1 WEF to only having turbines on the Eastern side of Stompneusbay road (P2160) with 500 m buffer from this road on eastern side, with no turbines on western side, excluding my farm from WC1 WEF completely, due to the 5 km buffer zone set by CEO of HWC.

The developers replied to DEA, against Appeal from HWC, and asked for approval if they set a 3.5 km buffer around Kasteelberg with no turbines placed on western side of the road, excluding my farm from the WEF.

### 5.3. Decision

On 2 November 2011 at an Impact Assessment Meeting held at offices of HWC, the CEO of HWC and IACOM members agreed to support the mitigated layout of the WC1 WEF developers with the 3.5 km buffer around Kasteelberg.

I was present at this meeting where the CEO of HWC, Mr. Andrew Hall supported this revised layout and set the 3.5 km buffer zone around Kasteelberg and 2km on either side of Stompneusbay road (P2160) for future development.

The Minutes of this meeting was done by Me. Jenna Lavin.

The lack of feedback from HWC resulted in the nomination for PHS of Kasteelberg being put on hold.

The DEA then approved and amended the EA for WC1 WEF.

My farm was excluded from the WC1 WEF and that was the reason why the buffer zone was not changed in the amended EA.

This decision made by the CEO of HWC, Mr. Andrew Hall resulted in my farm being excluded from the West Coast One WEF, resulting in total loss of income from this WEF, for my family and farm workers.

### 5.3 New Heritage Impact Assessment



The Heritage Impact Assessment(HIA) from Archeological Contracts Office (ACO) for the Boulders windfarm varies drastically from the HIA for West Coast One Wind Farm also compiled by ACO!

A Heritage officer/specialist of ACO was present at the IACOM meeting held on 2 November 2011 at HWC where the 3.5 km buffer zone was implemented.

So ACO should know the extreme significance of this site, and should have implemented a 3.5 km buffer zone from the start.

It is exactly the same kind of development and impacts stay exactly the same, so the outcome of the HIA should be exactly the same or even higher buffer zones should have been implemented.

Why was?

- a) The 2km buffer zone around Kasteelberg reduced to 1.5km on eastern side.
- b) The 500 m buffer zone from Stompneusbay road was reduced from 500 m to 250 m
- c) Why is this proposed PHS Kasteelberg with Grade 2 Significance now suddenly not so important by ACO?

The reasons given by ACO in HIA are unfair and ungrounded and was merely the opinion of one of their own heritage specialists.

The viewsheds from the existing WC1 WEF towards Kasteelberg is still unchanged.

The viewsheds from Vredenburg on Stompneusbay road towards Kasteelberg to the western side is still unchanged.

The viewsheds from Brittanica Heights(Stompneusbay/St Helena Bay) to Kasteelberg is unchanged with turbines to the far east, 3.5 km away.

The viewsheds from Paternoster PHS and the sea to Kasteelberg is unchanged with turbines in the far back with 3.5 km space in between.

Apparently the independence and integrity of ACO was compromised in the compiling of this HIA, or my farm was apparently victimized by ACO during the compiling of WC1 WEF HIA?

Alternative:

In the FSR it is stated that there was no alternatives for this project, but during the EIA process done by Aurecon for IDP Power there were alternatives!

Boulders Windfarm have lease agreements for some of these farms.

See attached map(IDPMap2011.pdf)

How is it possible to state that there was no alternatives?

Conclusion:

I am a struggling farmer in a low rainfall region with no other income than farming.

The income from Wind energy from the WC1 WEF was the only way to insure income for the future for my family and farm workers.

Due to a heritage resource on my farm, this income was lost, and I had to sell livestock to make ends meet during this drought stricken times and with the weak economy.



At the IACOM meeting at HWC on 2 November 2011 the CEO of HWC proposed that he will speak to the Minister Of Cultural Affairs for compensation for landowners of High Heritage graded Sites, but till today no response from either.

I have sent numerous emails to HWC informing them of my intentions below with no response.

My conclusion in this regard are, if any Wind Turbines from Boulders Windfarm be approved within this 3,5km buffer zone from Kasteelberg(KBS) and within the 2km Stompneusbay gravel road(P2160) buffer zones on both western and eastern sides of P2160, I will take Legal action against Heritage Western Cape, its Governing Authorities and the Department of Environmental Affairs for Loss of Income, Tort and Victimization.

If any documents are unclear do not hesitate to contact me!

Yours Sincerely

Danie Kotze

Rooiheuvel Trust

Rooiheuvel

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Vredenburg

7380

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E-mail: [danierooiheuvel@gmail.com](mailto:danierooiheuvel@gmail.com)



Our Ref: HM/WEST COAST/SALDANHA BAY/VARIOUS FARMS/  
PROPOSED WEST COAST ONE WIND ENERGY FACILITY  
Case No: 1152

Enquiries: Jenna Lavin  
Tel: 021 483 9685  
E-mail: [rwiltshire@pgwc.gov.za](mailto:rwiltshire@pgwc.gov.za)

03 November 2010

Savannah Environmental (Pty) Ltd  
Unit 606  
1410 Eglin Office Park  
14 Eglin Road  
Sunninghill  
2157

**HERITAGE COMMENT:**

**PROPOSED WEST COAST ONE WIND ENERGY FACILITY AND ASSOCIATED  
INFRASTRUCTURE ON SITE NEAR VREDENBURG**

Portion 1 (remaining extent) and Portion 4 of Boebezaks Kraal 40, Portions 1, 2, 3,  
4, 5, 6 and 9 of Frans Vlei 46 and Portion 4 and 5 of Zoutzaksfontyn 95 on the  
Vredenburg Peninsula, Western Cape.

The Draft Environmental Impact Assessment for the above project was discussed at the  
Heritage Western Cape Impact Assessment Review Committee on 3 November 2010.

It was noted that:

1. The Kasteelberg Archaeological Site and Cultural Landscape is being proposed for declaration as a Provincial Heritage Site.
2. The Kasteelberg contains at least 32 archaeological sites of varying ages.
3. Amongst the archaeological occurrences on Kasteelberg are the sites known as KBA and KBB that provide information on Khoekhoe herders with sheep, and later cattle, at the Cape around 2000 years ago. They also contribute more broadly to the debates around the development of pastoralism in South Africa.
4. Kasteelberg is considered to be the most significant pastoralist site of this time period excavated in South Africa and is therefore of provincial, national and even international heritage and scientific significance.
5. Kasteelberg is considered to be of cultural significance and special value to the national estate in terms of section 3(3) of the National Heritage Resources Act because of its contribution to South Africa's history; its uncommon and rare heritage resources; its importance in demonstrating the principle characteristics of a particular class of South Africa's cultural places and its importance in demonstrating a strong and special association with direct descendants of Khoekhoe pastoralist communities for social, cultural and spiritual reasons.
6. The Kasteelberg Koppie is a prominent feature of the local landscape. It has important scenic value as part of a cultural landscape in a region that has a high tourism appeal.

*with cattle found*

*for whom*

[www.ecpe.gov.za/culture\\_sport](http://www.ecpe.gov.za/culture_sport)

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Our ref: HM/WEST COAST/SALDAHNA BAY/VREDENBURG/VAROUS

**FARMS/WEST COAST ONE WIND ENERGY FACILITY:**

**PROJECT REFERENCE NO. 12/12/20/1581**

**Case No: 1152**

**Enquiries: Jenna Lavin  
Tel: 021 483 9685  
Email: jlavin@pgwc.gov.za**

19 April 2011

The Minister of Water and Environmental Affairs  
Private Bag X313A  
PRETORIA  
0001

For attention Mr T Zwane,  
fax no 012 320 7561;  
email [twane@environment.gov.za](mailto:twane@environment.gov.za)

Dear Minister

**APPEAL AGAINST ENVIRONMENTAL AUTHORIZATION FOR:  
PROPOSED WEST COAST WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE,  
WESTERN CAPE PROVINCE**

Heritage Western Cape, which is mandated in terms of the National Heritage Resources Act, No 25 of 1999, as the Western Cape Provincial Heritage Resources Authority, hereby appeals against the National Department of Environmental Affairs authorization (DEA Ref No. 12/12/20/1581, dated 16 March 2011) of the application by Moyeng Energy (Pty) Ltd for the construction of a wind energy facility and associated infrastructure on a site near Vredenburg (Portion 1 (Remainder) and Portion 4 of Boebezaks Kraal 40, Portions 1,2,3,4,5,6 & 9 of Frans Vlei 46 and Ptns 4 & 5 of Zoutzaksfontyn 95) on the West Coast of the Western Cape Province.

Heritage Western Cape (HWC) supports the principle of renewable energy and acknowledges that Wind Energy Farms are to become a common feature in the Western Cape. However, in the absence of a strategic environmental plan including a comprehensive heritage component, HWC's ability to comment on the cumulative heritage impacts of such facilities is often compromised. But it is clear that there are certain cultural landscapes of high heritage significance (and intactness, representivity and integrity) which must be avoided in terms of large scale infrastructural development. The Vredenberg Peninsula and the landscape associated with the Kasteelberg Archaeological Sites is one such example.

**The High Heritage Significance of the Kasteelberg Archaeological Sites**

There is general scientific and historical agreement that Kasteelberg is the most important known herder site in the Cape, and as such it must be protected. This will be done by proclamation, by HWC, of the immediate area as a PHS, but the site must retain, as far as possible, an unspoilt sense of place and cultural landscape in order to conserve its integrity and authenticity. There is no other complex of sites that will produce the equivalent prehistoric information we have from Kasteelberg on early pastoralist economy, ritual behaviour and culture. Most other sites of this period were ephemeral camp sites.

[www.capegateway.gov.za/culture\\_sport](http://www.capegateway.gov.za/culture_sport)

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	Staatadres: Profeta Asuranda-gebou, Groentemarkplein, Kaapstad, 8000 • Posadres: Private Bag X9067, Kaapstad, 8001 • Tel: +27 (0)86 142 142 • Fax: +27 (0)21 483 9642 • E-pos: <a href="mailto:hwc@pgwc.gov.za">hwc@pgwc.gov.za</a>



7. The cultural landscape comprises the Kasteelberg Koppie and associated archaeological sites as well as historic ruins, groves of trees and two occupied 19<sup>th</sup> Century farmsteads (Rooiheuvel and Klipheuvel).
8. The wind energy facility will negatively impact on the significance of the cultural heritage resources as well as the cultural landscape.
9. There is no mitigation that will ameliorate the negative visual impacts anticipated for these entities and sites.
10. A land use conflict exists with regard to the private nature reserves and conservancies that exist within the West Coast Biosphere Reserve as the visual intrusion of the turbines would impose limitations on conservation based development and opportunities.

The Impact Assessment Review Committee of Heritage Western Cape agreed that:

1. Kasteelberg is of provincial, national and even international cultural heritage and scientific significance
2. **The proposed West Coast One Wind Energy Facility and associated infrastructure near Vredenburg should not be approved as it will adversely affect the cultural heritage values of Kasteelberg.**
3. Heritage Western Cape must be informed of the final decision taken on this matter by the Department of Environmental Affairs and Development Planning in the Western Cape in case Heritage Western Cape wishes to exercise its right to appeal. Heritage Western Cape must be informed of the process for appeal.

Yours faithfully

Jenna Lavin

**Heritage Officer (Archaeology)**  
**For: Accounting Authority: Heritage Resources Management Services,**  
**Pp Heritage Western Cape**

[www.eop.gov.za/ewc/ewc\\_sport](http://www.eop.gov.za/ewc/ewc_sport)

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Kasteelberg has at least 30 sites around it, some as old as the Middle Stone Age (over 100,000 years old). Its main significance, however, is that it was occupied by herding Khoekhoen from about 1800 years ago until the colonial period. The site was well researched in ten years of scientific excavation and a monograph on this work was published by Prof. Andrew Smith in 2006. More ephemeral sites in the area have since been investigated by an international team of South African, French, and German archaeologists, as published by Karim Sadr *et al.* in 2004 and 2006.

The site has an important link with the sea - shellfish and other marine resources were an important component of the prehistoric diet of the occupants of Kasteelberg. The herders were culling seals and brought them up to the hill to use both the meat and the fat as part of their economic and ritual life. Mixed with ochre, the fat was smeared over the bodies of the Khoekhoen as a symbol of wealth. More than 100 grinding grooves in the bedrock granite boulders around Kasteelberg B site as well as portable ones in the archaeological deposit have been found. The evidence suggests that these were used for grinding ochre, and they attest to this important behaviour.

It is considered important that the view-shed from the site and particularly the visual link between the hill and related sites should be protected. Kasteelberg forms part of a collection of sites which derive their heritage value as part of a broader cultural landscape context (in this case relatively intact and highly representative). Appendix 1, which is Figure 2 from the SAHRA nomination documentation, indicates some of the Kasteelberg sites recorded in the late 1990s. Many other surveys have since been done expanding this evidence. The coast of the Vredenburg peninsula is among the richest archaeological resources in the province and includes the Paternoster shell midden that is already a Provincial Heritage Site.

Kasteelberg is the most important site we have reflecting the lifeways of the herder ancestors of the Khoekhoen of the Cape. "As such it is symbolic of the people whose willingness to trade with European sailors from the late fifteenth century onwards encouraged the establishment of the DEIC refreshment station in 1652, but led subsequently to the demise of their society" (SAHRA nomination documentation 1999).

#### Impacts on Sense of Place and Cultural Landscape

Kasteelberg is a prominent place in the landscape, and has important scenic value. It can be seen from all the main roads around it: Vredenburg to Paternoster, Vredenburg to Stompneusbaai and the link between the Stompneusbaai Road and Paternoster at Schuiljiesklip Farm. As indicated in the Visual Impact Assessment, the development will have high impact on the scenic aspects of the area and the integrity of this important cultural landscape.

The current view-shed from the granite kopie on which the main Kasteelberg site resides provides a rural landscape overlooking grasslands that is not inappropriate as the cultural landscape of a Khoekhoen herder site. This, we contend, would change dramatically with the introduction of an industrial landscape in the form of wind turbines.

Heritage Western Cape is thus of the opinion that:

- a) The scale and nature of the proposed development will dramatically alter and negatively impact the wilderness and rural landscape setting of the Kasteelberg Archaeological Sites which are soon to be a Provincial Heritage Site.
- b) The introduction of large scale vertical elements in the form of 55 X 80m high wind turbines and associated overhead powerlines within the centre of the Vredenburg Peninsula will dominate the skyline from various perspectives and thus negatively impact the landmark qualities of Kasteelberg and visual-spatial connections between sites.
- c) The proximity of a number of turbines to the base of the Kasteelberg will have a negative impact on the experiential and landmark qualities of this site including views to and from the site.
- d) The proximity of a number of turbines to the public routes across the Vredenburg Peninsula will impact the public visual appreciation of this important cultural landscape.



### Grounds for Appeal

1. Heritage Significance of Kasteelberg:
  - a) The extremely high heritage significance of Kasteelberg and related sites in the surrounding landscape has been recognised by archaeologists and historians worldwide. No other site has as much detailed evidence of the lifestyle and sustained presence of Khoekhoe herders along the west coast between about 1800 and 500 years ago.
  - b) Kasteelberg is in the process of being declared by Heritage Western Cape (HWC) as a Provincial Heritage Site (PHS), in terms of the National Heritage Resources Act, Act No. 25 of 1999.
2. Process: A) The no-go option, recommended by HWC because of the uniqueness of the site, was disregarded by DEA and no reason was given:
  - a) HWC submitted its comment (Appendix 2) on the Heritage Impact Assessment by the Archaeology Contracts Office, undertaken in the scoping phase. In most respects HWC endorsed the findings of the Heritage Impact Assessment. **HWC, however, proposed that the project NOT be approved, because of the significance of the site and the impact of the proposed development on its sense of place.**
  - b) In the final EIA, the HWC objection was included in the Public Participation Section, but not in the discussion (table) and not in the appropriate section for the comments from commenting-authorities.
  - c) Misleading information was supplied on page 135 implying that the Minister of Arts and Culture did not support nomination of the site as National Monument in 1998. In fact, the Minister had placed a moratorium on the declaration of any sites at that time, indicating that it would be more appropriate to wait until the new National Heritage Resources Act (25 of 1999) had been promulgated.
  - d) There is no discussion of the HWC Authority's objection to the development of a wind energy facility here in the body of the EIA. No reasons were given for disregarding the heritage authority's comment requiring a no-go area.
  - e) HWC is therefore concerned that its comment may not have been adequately presented to the Department and therefore the Department did not reflect in its decision the extremely high significance of the site – both regionally and nationally.
3. Process: B) The process followed by DEA in not informing HWC of the decision was flawed:
  - a) Heritage Western Cape required that HWC "must be informed of the final decision taken on this matter" ... "in case Heritage Western Cape wishes to exercise its right to appeal".
  - b) Heritage Western Cape did not receive the final Environmental Impact Assessment (EIA) for authority review, nor was it informed of the final decision, as requested.

It is noted that the Department indicated that "No turbines, substations, roads, cable trenches and other associated infrastructure should be located around the foot of the archaeological site of Kasteelberg (this includes Turbines 53, 52, 50, 47, 45, 44, 42, 40, 39, 38 & 38 (sic)" after the recommendation of the Archaeology Contracts Office in its Archaeological Heritage Impact Assessment. Included in the DEA authorisation is that "the buffer of at least 2 km, around Kasteelberg must be discussed and agreed upon further by the applicant and Heritage Western Cape prior to commencement of the project. Such agreement must be submitted to the Director Environmental Impact Evaluation at the Department (and the rest of Point 10.7 on pages 14 and 15 of the Department of Environmental Affairs Environmental Authorisation Reg. No. 12/12/20/1581)".

HWC, in requiring the no-go option in its original comment, indicated that 2 km is an inadequate buffer for one of the most important heritage sites in the province. HWC considers that given the archaeological and historic significance of the site it should be preserved as a Khoekhoen legacy for future generations.



The preference of HWC would be to exclude all wind farms and the associated infrastructure and power lines entirely from the view-shed of this significant site. In particular, HWC would wish to retain the sense of place and the visual appreciation that this was an important historical cultural landscape.

HWC suggests that the "no go" zone should include **the extent of the proposed PHS on the koppie, with a buffer around that of at least 5 km, possibly more depending on viewsheds** (Figure 1). It should include the Paternoster PHS, visual connections between the berg and sea, prominent views from scenic route corridors, etc. The spatial extent of the suggested 5 km "no go" zone may not be a regular "polygon" given specific topographical conditions and a hierarchy of visual-spatial relationships.

#### Heritage Western Cape Recommendation

Therefore:

**HWC, in considering the heritage significance and scenic value of this site, appeals the decision and recommends that in order to protect this proposed provincial heritage site, the application NOT be approved.**

Although we would prefer not to have to do this, HWC regards this site as being of such importance that should this appeal fail, HWC will consider using other mechanisms at its disposal to prevent this development.

We look forward to your response.

  
Andrew Hall

**Chief Executive Officer  
Heritage Western Cape**

Attached:

Appendix 1: Figure showing Kasteelberg and related sites, which had been identified in archaeological surveys, from a figure that appeared in the SAHRA nomination documentation. Very many other sites have been mapped in surveys undertaken since then, but given the time constraints, this figure has been used.

Appendix 2: The Heritage Western Cape response to the Draft EIR submission for the Moyeng West Coast One Wind Energy Facility.



WCI Authorisation March 2011  
12/07/2011

Department of Environmental Affairs  
Environmental Authorisation Reg. No. 12/12/2011/581

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### Decision

The Department is satisfied, on the basis of information available to it and subject to compliance with the conditions of this environmental authorisation, that the applicant should be authorised to undertake the activities specified below.

Details regarding the basis on which the Department reached this decision are set out in Annexure 1.

### Activities authorised

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2006 the Department hereby authorises –

**MOYENG ENERGY (PTY) LTD**

with the following contact details –

Mr Tommie Potgieter  
Moyeng Energy (Pty) Ltd  
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2196

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to undertake the following activities (hereafter referred to as "the activities"):

SP

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Page 2 of 23



Department of Environmental Affairs  
Environmental Authorisation Reg. No. 12/12/20/1561

consideration should be given to limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time.

- 10.5.5 Roads must be designed so that changes to surface water runoff are avoided and erosion is not initiated.
- 10.5.6 Internal access roads must be located away from drainage bottoms and avoid wetlands, if feasible.
- 10.5.7 Internal access roads must be located to minimize stream crossings. All structures crossing streams must be located and constructed so that they do not decrease channel stability or increase water velocity.
- 10.5.8 Existing drainage must not be altered, especially in sensitive areas.

#### 10.6 Noise

- 10.6.1 Turbines 4, 6, 8, 13, 23, 24, 25, 28, 29, 37, 38, 39, and 40 must be relocated to an area where it is more than 1km from the downwind receptors. Should the layout change significantly, the new layout must be remodelled/reviewed in terms of the potential noise impact by an independent acoustics specialist. This includes the situation when the existing layout is slightly modified, yet some of the potentially problematic turbines are still within a radius of 1km from a potentially sensitive receptor.
- 10.6.2 The applicant must appoint an approved noise inspection authority to conduct noise monitoring at the potential sensitive receptors on a quarterly basis. Annual feedback regarding noise monitoring must be presented to all stakeholders.
- 10.6.3 The applicant must ensure that all equipment and machinery are well maintained and equipped with silencers.
- 10.6.4 The applicant must provide a prior warning to the community when a noisy activity is to take place.

#### 10.7 Historical/ Paleontological Resources

- 10.7.1 No turbines, substations, roads, cable trenches and other associated infrastructure should be located around the foot of the archaeological site of Kasteelberg (this include Turbines 53, 51, 50, 47, 45, 44, 42, 40, 39, 38 and 38). The buffer of at least 2km around Kasteelberg must be discussed and agreed upon further by the applicant and Heritage Western Cape prior to

SPI



commencement of the project. Such agreement must be submitted to the Director: Environmental Impact Evaluation at the Department.

- 10.7.2 If there are any changes to the layout of the turbines, then additional survey work will be required in order to ensure that no sites are directly impacted and/or to identify the need for an excavation permit.
- 10.7.3 Heritage sites in proximity of Turbine 2, 32, 37 and 47 must be fenced off by an archaeologist to ensure that they are not impacted by roads or tower footings.
- 10.7.4 Turbines must be placed at least 2km from the local road to Stompneus Bay, 2 km from the R45 route to Patemoster and 500m from the farmsteads of Rooiheuwal and Klipheuwal.
- 10.7.5 Field samples of natural and artificial rock exposure within the study area as a whole must be undertaken by a qualified palaeontologist to identify specific areas or horizons of palaeontological sensitivity on the ground and to determine if fossils could occur.

**10.8 Hazardous Materials and Waste Management**

- 10.8.1 No dumping or temporary storage of any materials may take place outside designated and demarcated laydown areas, and these must all be located within areas of Low botanical sensitivity.
- 10.8.2 Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions. Hazardous substances must not be stored where there could be accidental leakage into subterranean water.
- 10.8.3 The applicant must ensure that an effective monitoring system is put in place to detect any leakage or spillage of all hazardous substances.
- 10.8.4 Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions. Furthermore no chemicals must be stored nor any vehicle maintenance must occur within 350 m of the temporal zone of wetlands, whether a drainage line with or without an extensive floodplain or hillside wetlands.
- 10.8.5 An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste shall be disposed of at a landfill licensed in terms of section 20 (b) of the National Environment Management Waste Act, 2008 (Act No. 59 of 2008).

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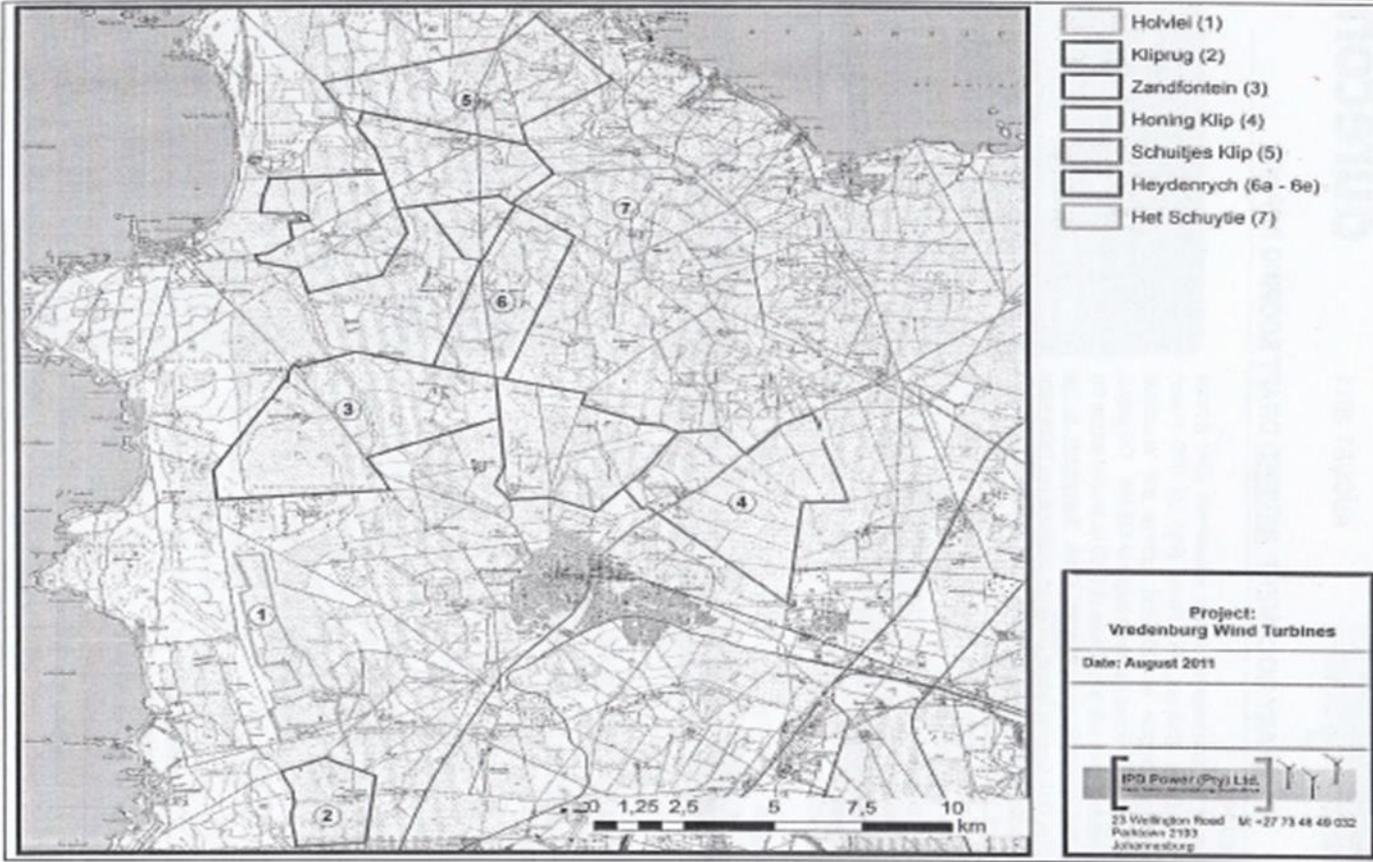
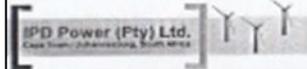


Figure 1: Locality Map



