

**FINAL ENVIRONMENTAL IMPACT ASSESSMENT  
REPORT**

**Boulders Wind Farm**

**Vol. 4**

**APPENDIX F-2**

**Proofs of submissions received  
from Britannica Heights I&APs**

September 2019







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## PROOFS OF SUBMISSIONS RECEIVED FROM I&APs

### Britannica Heights Residents

*Christa Botha*

From: Christa Botha <christabotha.queenie@gmail.com>  
Sent: Tuesday, 02 July 2019 16:52  
To: Louise Van Aardt <info@cesnet.co.za>  
Cc: Maura Talbot <m.talbot@cesnet.co.za>  
Subject: PROPOSED BOULDES WIND FARM

Herewith are our concerns about the proposed erection of the above-mentioned windfarm adjacent to our residences on Britannica Heights in St. Helena bay:

#### VISUAL IMPACT:

We purchased this property for the peace, serenity and uninterrupted views it offers. Now we are being "bullied" into having these HUGE, ugly, noisy structures erected right in front of our properties overlooking Paternoster.

#### PROPERTY VALUES:

In the meeting recently held at 26 Columbine Crescent we were told that estate agents in St. Helena Bay mentioned there have been no property values affected by Vredenburg 1 Windfarm. There are NO properties located as close to that windfarm as WE will be to the Boulders turbines, so of course that first windfarm had no affect on property values.

In the USA there have been studies done by various organisations, of which one is Forbes and Jude C Forbes asks the following question:

WHY WOULD ANYONE CHOOSE TO BUY A PROPERTY OVERLOOKING A WINDFARM?

Michael Mc Cann appraisal LLC based in Chicago concludes:

RESIDENTIAL PROPERTY VALUES ARE ADVERSELY AND MEASURABLY IMPACTED BY CLOSE PROXIMITY OF INDUSTRIAL-SCALE WIND ENERGY TURBINE projects. Approximately up to 40%+ of value loss.

Johan L. Goodwin (real estate broker in CANADA) states that wind turbines absolutely do impact property values and TURBINES COMPLICATE YOUR PROPERTY ENJOYMENT PERIOD and that alone spells depreciated values.

Ontario Superior Court of Justice: determined that land owners living near large wind farms DO suffer from lower property values - up to a 55% reduction.

There are too many studies to mention which have proved this point.

South Africa are just erecting turbines everywhere without the proper impact studies have been made regarding erecting windfarms in close proximity to residential areas.

#### HEALTH:

In various studies done in many countries the following problems were affecting residents of nearby wind farms: Noise - grating and incongruous sounds that distract rest (sleep),



headaches, fatigues, temporary feelings of dizziness, nausea, insomnia, palpitations, tinnitus - which are all cause a reduced quality of life.

Families are suffering adverse health effects and undue hardships caused by the IRRESPONSIBLE placement of industrial wind turbines around their homes/properties.

Then there is the FLICKERING of light by day AND night, as well as the blades glinting in the sun. How on earth can we as residents who were here FIRST be subjected to this????

Birds/bats will be severely affected and this area is so rich in birdlife.

Turbines also produce LOW FREQUENCY NOISE which causes

"vibroacoustic disease" which is harmful infra sounds on the inner ear of humans. I can just imagine how this must affect all animals close to the turbines as well!

We are not against wind turbines for enegy, BUT NOT right in our faces and virtually on our doorsteps as we will only be negatively affected, so will tourism, jobs will be lost and the "jobs" promised to the community by these turbine companies are not true. Specialists are imported to upkeep these turbines mostly from other countries.

There are MANY other perfect locations for this proposed windfarm, so please relocate Boulders to another location more suitable.

S.C. Botha

J. Botha

28 Columbine crescent

Britannica Heights

St. Helena Bay

*Gaylene Booyesen*

Booyesen, Gaylene:

From: Gaylene Booyesen [mailto:gaylenebooyesen@gmail.com]

Sent: Tuesday, 02 July 2019 14:03

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

Subject: Objection: Boulders Windfarm Draft EIA

Good day,

As interested and affected parties my family and I wish to raise an objection against the Boulders Windfarm development.

Green energy is welcomed, but a more environmentally friendly site further removed from our rural communities is the answer, or else we will suffer the consequences on our tourism trade, business, property value, crime figures and the character of our sleepy villages. We will shortly commence building on our Erf in St Helena Bay, Britannica heights and do not want to live next to these ugly turbines

This development is unwanted in our beautiful valley, please consider our objection.



Thank you,

Regards

Gaylene Booysen

0733243131

[gaylenebooyesen@gmail.com](mailto:gaylenebooyesen@gmail.com)

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*Engels, Anneline*

From: Anneline Engels <annelineengels@gmail.com>

Date: Tue, Jul 2, 2019 at 2:57 PM

Subject: OBJECTION TO BOULDERS WIND FARM DEVELOPMENT - RESIDENT BRITTANICA HEIGHTS

To: <info@cesnet.co.za>

Dear Ms Talbot, Mr Johnson and company

OBJECTION TO BOULDERS WIND FARM DEVELOPMENT

Anneline Engels

Erf nr.1867

17 Columbine Crescent

Brittanica Heights

St Helena Bay

Retirement property:

I am a property owner of a small holding in Columbine Crescent, Brittanica Heights, St Helena Bay.

My husband and I bought this small holding of about 1 hectare in Columbine Crescent at the end of 2015, property transfer took place in beginning of 2016, and we thought we had a fantastic deal with retirement in sight - the small, low maintenance farmhouse with a solar power system, grey water storage tank, indigenous water saving garden, wild life like Steenbökkies, tortoises, porcupine, hare, mongoose, guinea fowl, and a selection of birdlife roaming freely on the property and on the hill of this small holding development.

The building guidelines suited us perfectly: "To retain the rural character of the development, one may only clear a max of 2500 sqm of the natural fynbos for



development of the homestead and garden. The remainder of the stand may not be cleared and needs to remain in its original natural state.”

We loved the view across the valley of the neighbouring farms and Paternoster in the distance. We even had a sea view from the elevated position of our property, with no obstructions possible due to the building guidelines prescribing a height of 7m (double storey) at the highest of any dwellings in front of us.

We are planning to retire to this quiet, peaceful and virtually crime free rural neighbourhood with our dogs as soon as we can sell our current residence in Saldanha.

I have to emphasize, we were not in any stage of buying the property informed or warned either by the previous owner or the estate agency SEEFF of this planned wind farm development right next to us on the neighbouring farms and in our face!

If we were informed, we would not for a second have considered buying this piece of land that seemed to be everything a retired couple could wish for, after residing in a busy, industrial and crime ridden town like Saldanha.

Now we are confronted with this application for the Boulders Wind Farm introducing 45 turbines of 165m in height, with the closest one only about 4 km away! With these turbines right in our view, we would be able to see every turbine in full length, al 45 of them. And they won't be in our BACKYARD, but right in our front view where we expected to have a very scenic view of farmland and the sea.

So it is understandable that at this stage we are FURIOUS and feel cheated, and we would like somebody to be held responsible for this.

Please find attached my OBJECTIONS to the proposed Boulders Wind Farm, and my reviews of the impact studies conducted by certain specialists.

Regards.

Anneline Engels

Cell: 082 658 6599

2 July 2019

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## OBJECTION TO BOULDERS WIND FARM DEVELOPMENT

Anneline Engels

Erf nr.1867

17 Columbine Crescent

Brittanica Heights

St Helena Bay

### Retirement property:

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#### 8.13.3 Floor size and building height

No max area for the main house, however the main house must be at least 120 sqm in size and must precede any 2nd dwelling or outbuildings. You may build up to a height of 7m at the highest parapet - basically a double storey home or outbuildings. Later added: you may build a second dwelling (labourers' cottage), but it may not exceed 100 sqm in size.

#### 8.13.4 Fencing

No concrete (slab) or brick built boundary walls will be allowed. Only natural round or half-round wooden poles or slats (latte) may be used. These allowed methods may not exceed 1.5m above the natural land height.

#### 8.13.5 Additional development restrictions pertaining to stands 1759 - 1773, 1798 - 1852, 11500 - 11502:

To retain the rural character of the development, one may only clear a max of 2500 sqm of the natural fynbos for development of the homestead and garden. The remainder of the stand may not be cleared and needs to remain in its original natural state.



We were impressed that farm animals were allowed: Large animals like horses, cows, donkeys, smaller animals like sheep and goats, poultry, etc. so I was happy that my dogs were allowed. (I am involved in Animal Rescue so sometimes have more than the normal amount of dogs in my foster care.)

**Restriction on 'farm animals' kept:**

- Large animals like horses, cows and donkeys: 1 animal per every 2000 sqm in total will be allowed;
- Smaller animals like sheep and goats: 1 animal per every 2000 sqm in total will be allowed;
- No pigs will be allowed whatsoever and no exceptions;
- Poultry allowable only under the standard prescribed regulations governing the keeping of poultry.

We loved the view across the valley of the neighbouring farms and Paternoster in the distance. We even had a sea view from the elevated position of our property, with no obstructions possible due to the building guidelines prescribing a height of 7m (double storey) at the highest of any dwellings in front of us.

See the untouched farm views from our property across the valley to Paternoster and the sea in the background.





In the next picture the turbines of West Coast One can be seen in the distance on the left hand side of our view. (The much higher turbines of Boulders Wind Farm are going to obstruct this view up to 4 km's from our property.)



We are planning to retire to this quiet, peaceful and virtually crime free rural neighbourhood with our dogs as soon as we can sell our current residence in Saldanha.



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See extract:

### Sellers must disclose property defects

09 Feb 2011

*The full disclosure of property defects will be made even more important with the new Consumer Protection Act (CPA) which will be published in March 2011. "What is clear is that in the residential property marketing sector, full disclosure of any defects or potential defects will become essential," says Tony Clarke, managing director of Rawson Properties. "It will in fact be illegal not to mention these – and to put them in writing," says Clarke and adds that the failure to disclose a defect could lead to the cancellation of the sale agreement and the refunding of the full sale price. The seller should also then disclose upfront any problems he may have experienced with noisy neighbours (or their dogs), crime in the area, traffic or municipal services – and because this can deter a minority of buyers, he should also mention if there has been a death in the home recently.*

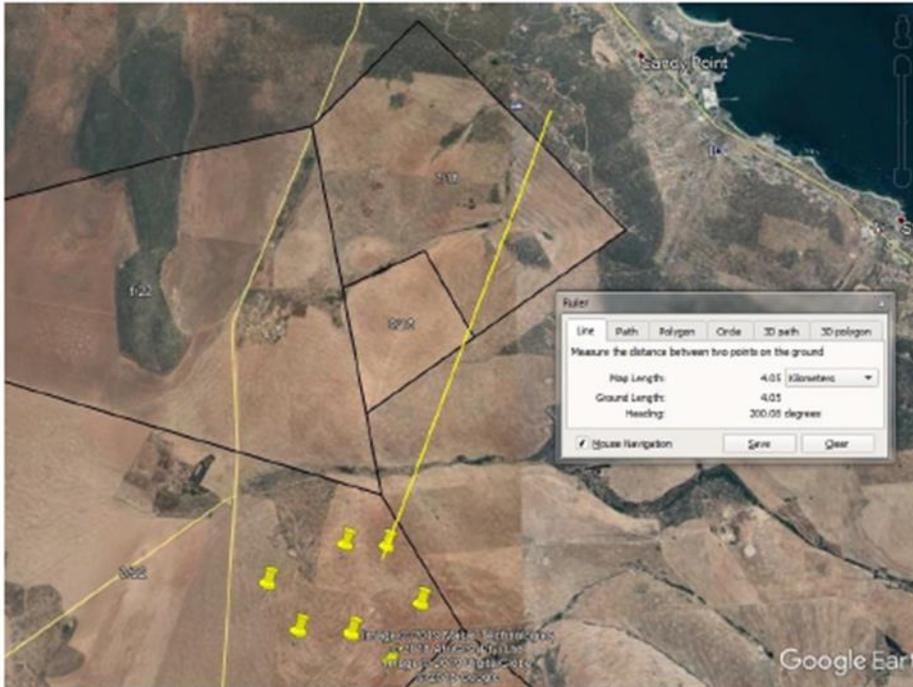
*It is particularly important to reveal any short- or long-term plans for rezoning in the area, says Clarke.*

*"Non-disclosure here could, again, be regarded as an illegal act."*

<https://www.property24.com/articles/sellers-must-disclose-property-defects/13092>

See aerial view of the proposed placement of 45 Boulders turbines, very close to the NO GO areas (Dark Red, ) as well as environmentally sensitive areas (Light Red.) The "pink" turbines are supposed to be moved to where the green





Now, I find myself being called one of the “NIMBY’s” (Not In My Back Yard,) also called a “free rider,” apparently a much hated and ridiculed and bullied party to this whole process. Let me illustrate the unfair classification of my objection as “Nimbyism” by these following extracts:

Explaining NIMBY Opposition to Wind Power

Eric R. A. N. Smith

<http://smith.faculty.polsci.ucsb.edu/wind.pdf>

*“Opposition to facility siting is conventionally equated with the Not-In-MyBack-Yard (NIMBY) syndrome. This phenomenon has been analysed in many different cases of infrastructure facilities (e.g., the siting of hazardous, nuclear, and conventional waste facilities, nuclear and conventional power plants, offshore oil drilling, roads, railroads etc.) and of social facilities as well (e.g., mental health care, housing, aids nursing homes etc.). Since the application of wind power began, developers have faced resistance with turbine siting, and ever since, these problems have been explained by appealing to the NIMBY argument. (“Explaining NIMBY Opposition to Wind Power” -*

*“The criticisms presented by opponents are many. Most notably, critics identify noise, visual intrusion, electromagnetic interference, harm to birds and other wildlife, distrust of developer*



*objectives, and lack of local ownership as the foremost reasons why they oppose wind farms (Erp 1997; Krohn and Damborg 1998; Simon 1996; Wolsink 1996)."*

*Apparently, the common sense phrase 'wind power is perfectly fine, but not in my backyard' is a very poor explanation for the opposition against wind power developments. In fact, very few people exhibit free rider behaviour in this social dilemma context. Moreover, the common sense view of NIMBY-ism is damaging to the implementation of wind power. A clear view on the NIMBY-concept is needed, because the current use of the concept has large consequences for all parties involved in the siting process ([13], p. 87). The concept simply does not allow any distinction to be made among the broad range of attitudes. By labelling all protests as NIMBY one misses the multitude of underlying motivations [16]. Looking at the possible positions people can have towards any infrastructure facility, we can distinguish different roots of opposition."*

*Resistance Type A:*

*A positive attitude towards wind power, combined with opposition to the construction of a wind farm anywhere in one's own neighbourhood. This attitude-behaviour combination reflects the only true NIMBY standpoint.*

*Resistance Type B.*

*Rejection and opposition to a wind farm in the neighbourhood because one rejects wind turbine technology in general. This position is sometimes called 'NIABY', or Not-In-Any-Backyard. This kind of opposition is based on concerns about the general consequences of wind power on the scenery.*

*Resistance Type C.*

*A positive attitude towards wind power, which becomes negative as a result of the discussion surrounding the proposed construction of a wind farm. This type shows the significance of the dynamics in attitudes, as it reflects a NIABY attitude resulting from changing risk perceptions during the decision-making process.*

*Resistance Type D.*

*Resistance created by the fact that particular projects are considered faulty, without a rejection of the technology as a whole. This type advocates the generation of wind power, but only under some conditions. This opposition is particularly limited to proposed wind farms on specific locations, as it is based on concerns about the consequences of a wind power plant, on primarily the scenery and, to a lesser degree, on interference and nuisance. People here may be unconvinced about the suitability of the selected site. They may expect interference or they may consider the landscape on the chosen location too sensitive, especially when other available locations nearby are considered more suitable. The dominant position of utilities also creates little institutional capacity for successful siting of wind-power facilities. Rather, it underpins the planning fallacy.*

*Although siting is recognised as the most important factor in the development of wind energy, those active in the electricity sector tend to view this as merely a 'market imperfection' or a 'bureaucratic obstacle' [20].*



*Such a narrow view is hardly conducive to effective planning."*

Should I say I find myself as a Resistance Type D Nimby, due to the following reasons:

1. The consequences of such a industrial type development (which this wind farm will eventually be) on the socio-economic situation of the St Helena bay area:

We have been residents of Saldanha Bay since 1987, for about 32 years. In our time, being beach front property owners in Saldanha Bay, we have seen this beautiful fisherman's village we found in 1987 develop into a major industrial town, suffering, amongst others, the discarded litter on our beaches from the cargo ships in the harbour, the red dust pollution due to the Transnet iron ore industry, the rise of Saldanha Steel, Namakwa Sands and the development of the IDZ, thousands of desperate jobless people streaming into fast expanding squatter camps, the rising in crime incidents almost daily in our neighbourhoods, the drop in our property values even right on the beach, (our retiring neighbour had his renovated beach front house in the market valued at R3,2 m, but it could only fetch R2m on auction!) the closing down of hundreds of businesses and restaurants in town who just couldn't survive throughout the years, and the growing trend for local residents to rather move and invest in property outside of this " industrial" town, like Langebaan, Jacobs Bay, Paternoster, St Helena Bay or Port Owen in Velddrif, where they were assured their property would increase in value, not be degraded by industrial development. Nobody wants to invest in Saldanha residential property, because there is no guarantee you will get your investment back!

That is also the reason we bought the smallholding in Brittanica Heights, to retire and get away from the stifling circumstances of living in a town so close to industrial zoning, with pollution and crime rising as more and more people stream to this area looking for work, but not finding any and resorting to crime.

After all, the reality is, we live in South Africa, where the unemployment rate rose to 27.6 percent in the first quarter of 2019 from 27.1 percent in the previous period. It is the highest jobless rate since Q3 2017, as the number of unemployed went up by 62 thousand to 6.20 million and employment fell by 237 thousand to 16.29 million.

<https://tradingeconomics.com/south-africa/unemployment-rate>)

Apart from a huge shortage of jobs, we also have a high rate of drug and gang related crime in the local communities which got worse as industrial development were introduced and poverty increased.



So, while economic and social upliftment were promised to us with the proposal of the IDZ development, it never happened!

Instead we live in fear in our neighbourhoods, with residents forming volunteer neighbourhood patrols trying to keep us safe day and night due to the police being overwhelmed, outnumbered, underpaid and even corrupted.

Law abiding citizens of this country are feeling progressively threatened and bullied by government departments to accept new developments claiming to benefit the socio-economic structures in their communities, but there is no trust in these claims.

Why?

2. Corruption in our government, even local municipalities are running rampant.

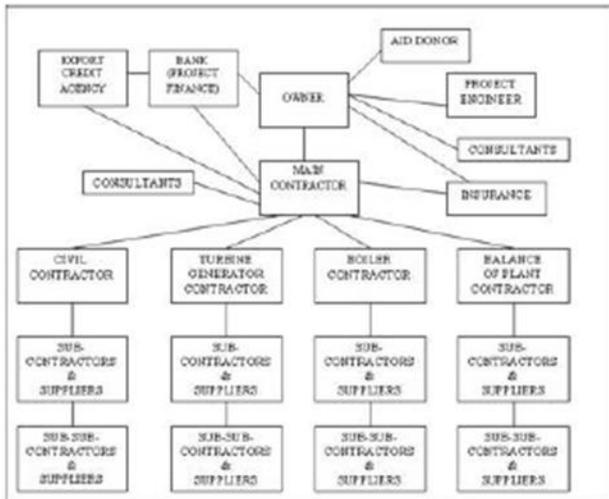
*"Corruption in [South Africa](#) includes the private use of public resources, bribery, and improper favoritism.<sup>[2]</sup> The 2017 [Transparency International Corruption Perceptions Index](#) assigned South Africa an index of 43 out of 100, ranking South Africa 71 out of 180 countries.<sup>[2]</sup> This ranking represents a downward direction change with a drop of two points down from 45 (2016 CPI).<sup>[2]</sup> Countries with scores below 50 are believed to have serious corruption problems.<sup>[4]</sup> "[https://en.wikipedia.org/wiki/Corruption\\_in\\_South\\_Africa](https://en.wikipedia.org/wiki/Corruption_in_South_Africa)) We are now so used to hear how government individuals pocketed bribe money.. "*

*"Anti-corruption efforts have not been successful as politicians and government officials seek personal gratification first at the expense of public interest."*

*"The cost of corruption can be divided into four main categories: political, economic, social, and environmental. "*

*"The nature of infrastructure projects facilitates corruption. In particular, the complex contractual structure, the diversity of skills, different project phases, the large size, uniqueness and complexity of projects, the concealment of some items of work by other items, the lack of transparency in the industry, and the extent of government involvement all contribute to an environment in which bribery, extortion and fraud can be difficult to prevent and detect."*

*"There is no culture of transparency in the infrastructure sector. There is little or no requirement for funders, project owners or project participants to make public details of the funding, the underlying project and the identity of the project participants, including the identity of the contractor, joint venture partners, sub-contractors, consultants and agents. Costs are as far as possible not disclosed, even when public money is spent. Commercial confidentiality has historically taken precedence over public interest. There may, therefore, be inadequate inspection of books and records which could uncover malpractice. Without such transparency, it is more difficult to detect, for example, suspicious funding arrangements, suspicious relationships between the participants which may facilitate corruption, projects which may have a corrupt purpose, projects which have been granted planning permission corruptly, or fraudulent contract pricing."*



"The extent of government involvement in infrastructure is significant. Most major international infrastructure projects are government owned. Even privatised projects normally require government approvals, such as planning permission, or agreements with government as to the terms on which the public may use the end product. The power wielded by government officials in this regard, when combined with the structural and financial complexity of the industry referred to above, makes it relatively easy for government officials, for example, to commission projects for their own purposes or to extract large bribes in exchange for the award of contracts or for approving inflated contract prices or fraudulent claims." ([http://www.qiacentre.org/why\\_corruption\\_occurs.php](http://www.qiacentre.org/why_corruption_occurs.php))

An example of such corruption can be seen in the following article:

*Feathers fly over Watson wind farm plan*

10 April 2019 By [John Yeld](#)

*Watsons planned to shoot Black Eagles, says Bosasa employee*

"The Watsons' Inyanda-Roodeplaat wind farm project, high in the Groot Winterhoek mountains near Uitenhage, has received environmental approval from the national department of environmental affairs (DEA). However, several appeals have been lodged.



*Legally, it is environment minister Nomvula Mokonyane who must adjudicate these appeals, but testimony at the Zondo commission has linked her to massive bribes in the form of cash, goods and services from Bosasa – and hence a huge possible conflict of interest.*

*The DEA had issued environmental approval for the wind farm. This had been recorded in a letter dated 5 April 2018, signed by Sabelo Malaza, chief director: integrated environmental authorisations.*

*Asked by GroundUp for an explanation, DEA spokesman Albi Modise confirmed that the department's team had decided that there was a need for an external review of the avifaunal assessment and had started with the procurement process to appoint an expert. "However, due to further delays with the procurement of specialists to undertake the review and additional financial implications to the department, it was decided that a decision must be made with the available information," Modise said.*

*But environmentalists close to the project say conversations with officials suggest that pressure from either top-ranking DEA officials and/or political players was brought to bear for a decision to approve the EIA. The DEA minister at the time was the late Edna Molewa.*

*Then acting Environmental Affairs Minister Lindiwe Zulu upheld five appeals against the 187.2MW, 47-turbine Inyanda-Roodeplaas wind farm. She noted that, according to the appellants, the proposed site and its surroundings had inherent conservation value as these were located in the near-pristine environment of the Groot Winterhoek Mountain and were between separate sections of Groendal Nature Reserve (Wilderness Areas) – "and thus very close to a World Heritage Site". Also, the site was within national and provincial Protected Area Expansion Strategy Focus Areas, and most of it had been identified as a Critical Biodiversity Area that included important habitat for a number of threatened species, including birds.*

*She wrote that the appellants had argued that issuing the Environmental Authorisation (EA) was fatally flawed because of the impact the project would have on birds, visually and on the "sense of place".*

[\(https://www.timeslive.co.za/news/south-africa/2019-04-10-feathers-fly-over-gavin-watson-family-wind-farm-plan/\)](https://www.timeslive.co.za/news/south-africa/2019-04-10-feathers-fly-over-gavin-watson-family-wind-farm-plan/)

### **3. Unreliable and biased study reports riddled with mistakes and irregularities:**

So, apart from major trust issues with our local government departments handing out approvals even though we as property owners seriously object against a development such as the enlargement of the existing West Coast One Wind farm, (which also got approval although residents of Paternoster were objecting to the detrimental effects of such a development on that particular site - see newspaper article "An ill wind blows in Paternoster " -



21 APR 2011 - FIONA MACLEOD) I believe that the different impact studies presented by CES is not representing the true implications for us as affected residents, i.e.:

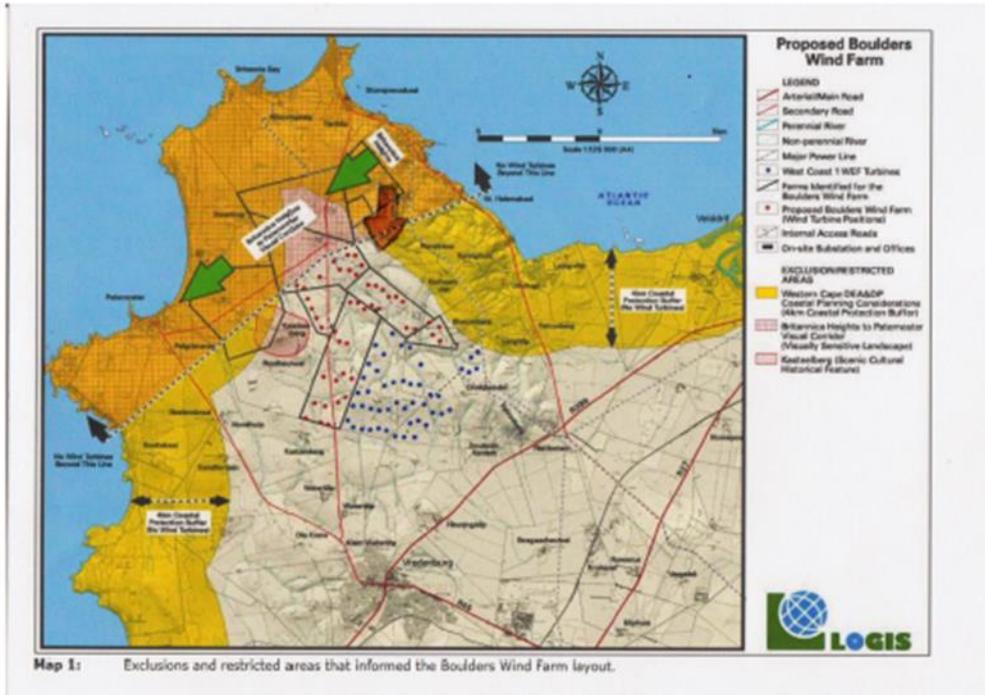
- a) the importance of the Visual Impact study (VIA) proving the visual impact being HIGH is not taken seriously enough,
- b) as well as the absolute nonsense that was dished up as the *BOULDERS WIND FARM PROPERTY EVALUATION STUDY REPORT of 27 July 2018 prepared by J.F. du Toit*,
- c) and the baseline bird study that was conducted by Miguel Mascarenhas of Bioinsight South Africa, was challenged by Andrew Jenkins in June 2019 in a "Peer review of the bird impact study for the proposed Boulders Wind Farm,"

The shortcomings of these "unbiased" studies should be taken into careful consideration when deciding whether this application is not threatened by a "fatal flaw" regarding the impact on Paternoster and St Helena Bay.

To me, the visual implications is the first and foremost detrimental effect this development is going to have on our daily lives.

See extractions from the Visual Impact Study by Lourens du Plessis (t/a LOGIS)

1. *The turbine layout adheres to a 4km coastal protection exclusion zone, as prescribed by the Western Cape Province's Department of Environmental Affairs and Development Planning (DEA&DP) Wind SEA (Strategic Environmental Assessment). The project proponent recognises the inherent value of the Atlantic seaboard and West Coast coastline as a scenic resource and tourist attraction, and subsequently agreed to not position any wind turbines within this zone.*



See red arrow on above layout, which indicates the view from Britannica Heights that will be taken away from us as property owners by the 45 turbines placed across the valley. All the turbines will be clearly visible from as close as 4km away.

How can this fact not have a very high visible impact from our point of view?

How can our property values NOT be severely impacted as well?

The “Boulders Wind Farm Property Evaluation Study Report,” prepared by J.F. du Toit Professional Valuer / Chartered Surveyor (FIVSA)(MRICS) is an absolute joke. Mr du Toit should be ashamed of this report with all its irregularities and incomplete findings. Nowhere in this study is there any mention about the Britannia Heights small holding development with about 118 properties, of which about 50 on the valley side of the hill would be impacted regarding property values due to the wind farm turbines right on their front door step!

And then he mentions the holiday towns “in the St Helena Bay area of the Britannia Bay, Golden Mile, Louville, Sandy Point, Shelley Point, St Helena Views and Stompneusbaai,” having no “real price influence in these towns due to the West Coast One. To correct him, Louville is not a “holiday town,” but a township for the poorer community in Vredenburg, right on the other side of the town. Maybe he meant Laingville, the township and squatter camp on the



outskirts of St Helena Bay, also further removed from the wind farm than any other community. I would never call Laingville a “holiday town,” it is a struggling community where many people are jobless, it’s crime ridden, with drugs and gangsters causing havoc. To mention “price influence” here due to the existing wind farm is just stupid and irrelevant, as clearly West Coast One did not bring any change for them!

*BOULDERS WIND FARM PROPERTY EVALUATION STUDY REPORT*

*Prepared by J.F. du Toit Professional Valuer / Chartered Surveyor (FIVSA)(MRICS)*

*“As can be seen there is generally an upward trend in prices. Price fluctuation is primarily due to the fact that this is a holiday town, with coastal and non-coastal properties, as well as an area where a very large number of properties are for sale in the market. Also, similar reports for the holiday towns in the St Helena Bay area of the Britannia Bay, Golden Mile, Louville, Sandy Point, Shelley Point, St Helena Views and Stompneusbaai would have been informative. I did an analysis of these and could not find any real price influence in these towns due to the West Coast One.*

*As can be seen from Figure 2 some of the properties of West Coast One slope in the direction of Vredenburg, where those properties of Boulders mainly slope away from the surrounding towns, including Vredenburg, which means that visually Boulders is less amplified than West Coast One. Figure 3, which depicts the location of the West Coast One and Boulders wind turbines and the topography of the area. This shows that in addition to the slope towards Vredenburg, some of the West Coast One wind turbines are also slightly closer to this town 2.5.7 With the before mentioned in mind it can be concluded that the case study conducted by Urban Econ in this respect, points to an even less intrusive impact by Boulders than West Coast One.”*

**This report is totally useless and I would suggest CES find a better “specialist” to conduct a realistic representation with proper viewsheds from every perspective, of what REALLY would happen with property values in ALL the affected communities surrounding the valley and the proposed site for the wind farm.**

***The Value of a View***

***“A home with a view will generally sell for more than a home without one. But just how much value does a view add?”***

*“There have been a number of court cases in recent years concerning new developments or home alterations that have threatened to obstruct the view from a neighbouring property, so there is no doubt that homebuyers put a value on having a view – of the sea, the mountains or sometimes of the city lights.*

*This is also evident, says Gerhard Kotzé, MD of the [RealNet estate agency group](#), from the fact that in any suburb with varied topography, the homes “on the hill” that offer a view will generally sell for more than those below. Similarly, at the coast the homes or stands with a good sea view always fetch higher prices than those without views or with only “partial”*



views." <https://www.privateproperty.co.za/advice/news/articles/what-should-you-pay-for-a-view/5842>

See court case regarding a building that “*derogate from the value of the adjoining or neighbouring properties.*” I can think of nothing worse that can derogate from the value of our property than 45 wind turbines at a height of 165 m on neighbouring land!

**“Neighbouring building plans ruining your scenery?”**

**“Constitutional Court rules that legitimate expectations of property owners should be considered”**

“On 19 February 2019, the Constitutional Court (CC) handed down its judgment in the consolidated matters of Trustees of the [Simcha Trust v Da Cruz and Others and City of Cape Town v Da Cruz and Others \(Simcha Trust\)](#) in which it had to decide whether there was an obligation on local authorities considering a building application, to apply the legitimate expectations test when considering whether the surrounding area where the building is to be erected would likely be disfigured or whether such a building would be unsightly or objectionable. Section 7 (1)(b)(ii)(aa) of the [National Building Regulations and Building Standards Act \(Act\)](#) sets out certain disqualifying factors whereby local authorities must refuse a building application, namely where the proposed building would:

(aaa) disfigure the area in which it will be erected;

(bbb) be unsightly or objectionable; or

(ccc) derogate from the value of the adjoining or neighbouring properties.

In 2010, the CC in [Camps Bay Ratepayers and Residents Association v Harrison](#) described the legitimate expectations test as a positive obligation on a local authority to satisfy itself that a hypothetical purchaser of a neighbouring property would not harbour legitimate expectations that the proposed application would be denied because it was so unattractive or intrusive.

In that case, the legitimate expectations test was only considered in relation to whether the building application would derogate from the value of neighbouring properties as envisaged in section 7(1)(b)(ii)(aa)(ccc) above and did not consider whether the legitimate expectations test would be applicable when evaluating the other disqualifying factors such as whether the proposed building would disfigure an area or where it would be unsightly or objectionable.



*The CC in Simcha Trust considered this question in light of a building application that had been approved by the City of Cape Town (Municipality) which allowed for the construction of four additional stories on a building owned by Simcha Trust, the effect of which would be that the newly erected stories would be built so as to touch the balconies on three stories of a neighbouring property.*

*Following litigation, the Simcha Trust had re-submitted the new plans to the Municipality which invited comment from interested parties. The Municipality received a number of submissions from neighbouring property owners opposing the application and thereafter granted the application. Litigation again ensued resulting in the High Court setting aside the development approval and which ultimately led to the CC being asked on appeal to consider a narrow point of law, namely the proper interpretation of s7 (1)(b)(ii)(aa) of the Act and whether the legitimate expectations test applies to all of the disqualifying factors in the section and not just the derogation of the value of adjoining or neighbouring properties in s7(1)(b)(ii)(aa)(ccc).*

*The CC held that the legitimate expectations test is an objective test, based on the relevant facts available to the local authority and when applied to each of the disqualifying factors in s7(1)(b)(ii)(aa) is an accurate translation of the duties of local authorities under the Act and the Constitution of the Republic of South Africa, 1996. The legitimate expectations test would accordingly require the decision maker to consider the impact of the proposed development on neighbouring properties from the perspective of a hypothetical neighbour.*

*In addition to this, the CC reaffirmed that the local authority when considering a building application, must be positively satisfied that there are no disqualifying factors present, and that such factors should be considered separately from the compliance with the other requirements of the Act.*

*The CC also emphasised that the application of the legitimate expectations test to all of the disqualifying factors does not place any additional obligations on local authorities to consult with the public above and beyond the existing requirements of law and stated that the decision maker should consider whether the proposed building will probably, or in fact, be so disfiguring of the area, objectionable or unsightly that it would exceed the legitimate expectations of a hypothetical owner of a neighbouring property.”*

**“This judgment is significant in that local authorities are now to apply the legitimate expectations test to all the disqualifying factors in order to make decisions which are geared towards preserving the value of surrounding properties and the appearance of the area as a whole, ultimately ensuring that the interests of property owners in the surrounding area are adequately protected.”**

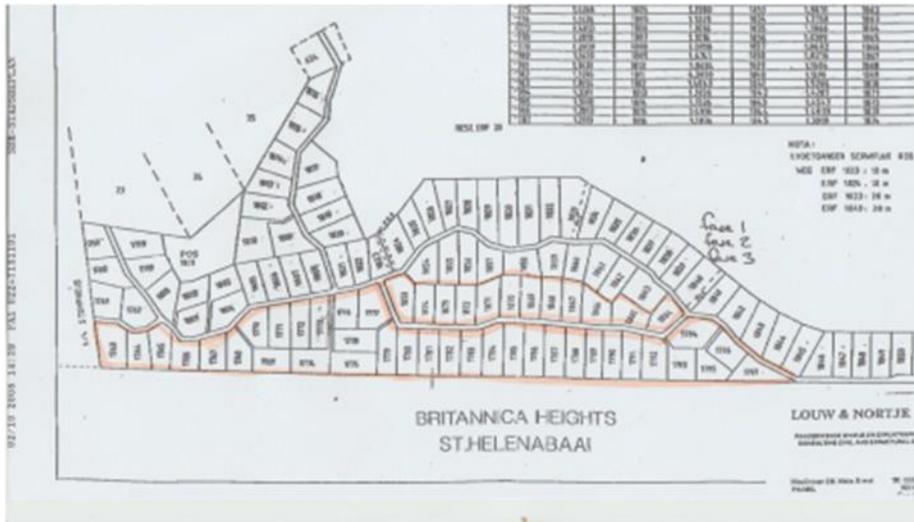
<https://www.bizcommunity.com/Article/196/368/190681.html>



Originally the land where Britannica Heights was developed were sold by the farmers in the valley “to make money.” Still zoned as “farm land,” 118 small holdings were sold to people like us wanting nothing more than peace and quiet in the natural environment on the hill above the farms below.

Now those same farmers have no problem taking away our beautiful view we thought was secured when buying the small holdings from them, they rather see us as the (selfish) enemy trying to prevent them claiming a highly desirable income per turbine in the next 25 years!

See the map of the layout of the Britannica Heights small holdings, where the 47 - 50 small holdings on the valley side of the hill, marked with orange, will be visually impacted by the proposed placement of the 45 wind turbines:



2. No wind turbines to be placed on or in close proximity (a minimum of 500m from the undisturbed (from agriculture) extent) of the Kasteelberg cultural historical site (as prescribed in the Visual Assessment Scoping Report). It must however be noted that Kasteelberg has not been formally proclaimed as a national or provincial heritage site. • The delineation of a visual protection corridor aimed at preserving the visual corridor (scenic pastoral landscape) between Britannica Heights and Paternoster (see Figure 1 below). No wind turbine structures will be placed within this corridor.

Only a minimum of 500m from the undisturbed (from agriculture) extent of the Kasteelberg cultural historical site, because it’s not “formally proclaimed as a heritage site! So, they don’t care, it is less worthy of being protected?



3. *The Britannica Heights to Paternoster Visual Corridor, indicated as a dashed line beyond which no turbines are to be located, is a spatial representation of the landscape view featured in Figure 1 above. The intention is to ensure that no direct visual intrusion of wind turbines affect observers located at Britannica Heights, when they look south-west towards Paternoster and the Atlantic seaboard, thereby protecting the pastoral character of the view corridor. This line is slightly bent in order to include observers/residents further south-east of Britannica Heights (up to Sterbakenkop hill). It should further be noted that the line represents a view corridor and not a viewshed from any specific observer or vantage point.*

As we don't trust the impact studies presented by CES, I believe we should follow other GIS methods to follow "the visual Guideline document (that) has been established by the Department of Environmental Affairs and Development Planning (DEA and DP) of the provincial government of the Western Cape (PGWC), which cover the VIA portion of an EIA on any project, not specifically related to wind farms. These guidelines are applied in a specific manner when assessing wind farms."

<https://www.ee.co.za/article/assessing-visual-impact-wind-farms-comprehensive-local-solution.html>

### **WIND FARMS VISUAL IMPACT ASSESSMENT**

#### **Assessing the visual impact of wind farms: A comprehensive local solution**

4. December 14th, 2017, Published in [Articles: Energize](#)

5. by Mike Rycroft, EE Publishers

*"Objections to large structures such as mobile phone towers, electricity pylons and other large structures are common, and justified. Large wind farms can have significant visual impacts for affected receptors, particularly those related to the tourism industry. Scenic resources also form part of the 'National estate' and are therefore protected by heritage legislation. Wind energy producers need to understand these issues when planning a wind farm to be successful in their applications."*

*"Many wind farm applications worldwide have been rejected because of visual aspects. This seems to be common in England and Scotland, which are understandably lands of great scenic beauty. Objections to wind farms are based on a number of common issues, included alleged health problems, threat to wild life, and in some cases claims that they are stealing the wind, but the visual aspects seems to be the most common, the most reasonable and also the most assessable."*



*"In spite of there being unrealistic objections, there is no doubt that some planners have attempted to steamroller any objection to wind, and to play down the impact of wind farms on a community or a place. Common arguments are based on the greater common good and financial benefits. One argument offered is that they are symbolic of the change to clean energy and should therefore be accepted irrespective of their impact. No doubt an obsession with renewable energy, and the profit motive has clouded the vision and dulled the sensibilities of numerous people, who fail to see any problems with wind turbines."*

**Assessment methods, standards and practices**

*"Although there are a number of accepted impact assessment methods and standards in use, there appears to be a wide variation in interpretation and application. In an attempt to develop a "best practice" approach for visual specialists, EIA practitioners and authorities involved in the EIA process, a visual Guideline document has been established by the Department of Environmental Affairs and Development Planning (DEA and DP) of the provincial government of the Western Cape (PGWC), [3] which cover the VIA portion of an EIA on any project, not specifically related to wind farms. These guidelines are applied in a specific manner when assessing wind farms."*

Table 2: Category of impact [2].

Categories of impact expected	
Very high visual impact	Potential significant effect on wilderness quality or scenic resources. Fundamental change in the visual character of the area. Establishes a major precedent for development in the area.
High visual impact	Potential protrusion on protected landscapes or scenic resources. Noticeable change in visual character of the area. Establishes a new precedent for development in the area
Moderate visual impact	Potentially has some effect on protected landscapes or scenic resources. Some change in the visual character of the area. Introduces new development or adds to existing development in the area.
Minimum visual impact	Potentially low level of intrusion on landscapes or scenic resources. Limited change in the visual character of the area. Low key development, similar to existing development in the area.



“Even with a VIA there are many interrelated problems [1]:

- The sites selected for wind farms, based on wind potential, are often in conflict with scenic and heritage resources, as well as protected wilderness areas. There is an inherent conflict between renewable energy resources and landscape. Wind turbines not placed in urban areas but in the country, which naturally increases the chance of encroaching on country or scenic areas which are valued. High wind sites are often located on ridges or high places, which are seen as local scenic places.
- Unlike heritage resources, for which there is a national data base and rating system, as well as legislation, there is no similar data base for our scenic resources, or even what constitutes a scenic resource. Scenic value and “sense of place” can be very subjective.
- Although guidelines are available for visual specialists, there are still wide discrepancies in approaches to visual assessments and rating of scenic resources.”

“A wide range in the standard of visual impact assessments (VIA) that are carried out. The guideline lists some of the current problems associated with visual and aesthetic assessments undertaken as part of the EIA process include the following [4]:

- A lack of understanding of the landscape processes that are responsible for specific visual qualities or scenic resources of the area.
- A lack of clarity in the methodology and determination of impact ratings, as well as inconsistency between different assessments.
- A lack of objectivity, or conflict of interests, especially where the assessment is carried out by the same firm that is representing the proponent.
- The risk that the ratings of impacts are tempered by the fact that the proponent is paying for the VIA.
  - Guidelines
  - The guidelines have simplified the process by means of a matrix formed by the visual rating of the area and the category of development involved. Table 1 shows the categories of development covered in the guideline.”

Table 3: Impact matrix [2].

Type of environment	Type of development (see box 2) Low to high intensity				
	Category 1 development	Category 2 development	Category 3 development	Category 4 development	Category 5 development
Protected/wild areas of international, national, or	Moderate visual impact expected	High visual impact expected	High visual impact expected	Very visual impact expected	Very visual impact expected



regional significance					
Areas or routes of high scenic, cultural, historical significance	Minimal visual impact expected	Moderate visual impact expected	High visual impact expected	High visual impact expected	Very high visual impact expected
Areas or routes of medium scenic, cultural, historical significance	Little or no visual impact expected	Minimal visual impact expected	Moderate visual impact expected	High visual impact expected	High visual impact expected
Areas or routes of low scenic, cultural, historical significance disturbed	Little or no visual impact expected. Possible benefits	Little or no visual impact expected	Minimal visual impact expected	Moderate visual impact expected	High visual impact expected
Disturbed or degraded site / run-down urban area / wasteland	Little or no visual impact expected. Possible benefits	Little or no visual impact expected. Possible benefits	Little or no visual impact expected	Minimal visual impact expected	Moderate visual impact expected

- From Table 1 it can be seen that wind farms fall into category 5.
- Table 2 lists the degree of impact expected
- The impact matrix is shown in Table 3
- From Table 3 can be seen that wind turbines should normally range from moderate to very high visual impact, and would justify a visual impact assessment in all cases.

From this visual Guideline document it can be seen that wind farms fall into category 5 - **“Very high visual impact expected”** regarding “Areas or routes of high scenic, cultural, historical significance,” which is what we have in this area with Brittanica Heights, Paternoster and other surrounding holiday or tourist destinations.

See the following extract:



*“Incorporating the visibility of coastal energy infrastructure into multi-criteria siting decisions”*

Panel: RobertGriffin<sup>a</sup>NicolasChaumont<sup>a</sup>DouglasDenu<sup>a</sup>AnneGuerry<sup>a</sup>Choong-KiKim<sup>f</sup>MaryRuckelshaus<sup>b</sup>

<https://www.sciencedirect.com/science/article/pii/S0308597X15002754>

*“Visual features on the landscape play significant and wide-ranging roles in people’s lives. Research has found links between nature viewing and many aspects of well-being [1], [2], real estate prices and views [3], [4], and a general public preference for natural and agricultural views accompanied by modest levels of development [5], [6]. Recent high profile opposition to offshore wind farms in the U.S. and Europe has demonstrated how visual impacts can play a significant role in determining the level of public support for large scale development in sparsely developed land and seascapes [7], [8], [9], [10]. Commonly standing 100 m or more, wind turbines are visible from as far as 30 km away [11]. The exposure that produces favorable wind conditions coincides with high inherent visibility and the potential for negative visual impacts to neighboring communities. Evidence from communities adjacent to land-based wind farms indicates that, while support for development is conditional on many factors [12], visibility concerns are consistently and frequently cited [13], [14]. In coastal settings they are a top concern [7], [15] and surveys have shown that coastal residents [16], [17], [18] and visitors [19], [20] are willing to pay to site wind farms further from shore where they are less visible.*

*Public opposition to infrastructure development imposes a financial burden on local communities and developers via costly litigation and, in the context of wind energy, threatens the growth prospects of a globally important renewable energy source. Despite this, landscape-level siting decisions for wind energy development are largely conducted without formal consideration for visibility prior to the siting decision. While visual impact analysis has reached a remarkable degree of sophistication over the last 30 years [21], the post-hoc nature of this analysis means that site selection is missing potentially important impacts and tradeoffs related to visibility, resulting in social welfare losses even in the absence of litigation [22].*

*To incorporate visibility considerations into infrastructure siting requires inverting the traditional lens of analysis from assessing visibility from a given point source to assessing where people in the study area can see over the landscape. The 360° range of visibility from an observation point, commonly known as a viewshed, is limited by such factors as the acuity of the human eye, intervening topography, the curvature of the earth, and*



*weather. In the fields of landscape planning and archeology, overall landscape visibility has been conceptualized by the term cumulative viewsheds, the aggregate visibility from multiple observation points [23]. This approach is beginning to attract attention in siting infrastructure [24], [25]; however to-date it has been conducted only from the perspective of a handful of observation points – generally scenic overlooks and population centers.”*

As a tourist destination which attracts large numbers of tourists and creating an increasing number of jobs in the tourist industry, as well as a quiet and safe retirement destiny for a large number of elderly people, it would be detrimental rather than beneficial to develop another ugly industrial wind farm killing birds and bats, and covering large areas of rural farm land otherwise contributing to the beautiful scenery and “feel” of our West coast fisherman’s villages.

Who would find it acceptable to develop a wind farm with 45 turbines right next to a retirement village? Britannica Heights mostly has elderly retired/ residents, a lot of these small holding property owners are overseas or elsewhere, and were never contacted to inform them of this proposed development right next to their investments!

Paternoster as tourist destination was recently featured in a well-known holiday magazine, the “WEG.”

*PATERNOSTER in die WEG-tydskrif...*

*“Jy weet al van Paternoster se heerlike seekos, maar het jy geweet dié visserdorpie is ’n uithangplek vir kunsliefhebbers? Die Paternoster-kunsroete is 2,5 km lank en huisves pragtige kuns- en beeldhouwerk en fantastiese fotografie.*

*Die volgende galerye is ingesluit: Die At Botha-kunsgalery, Magda Art, pb Ceramics en Stone Fish Studio and Gallery. Die studio bied klasse en werksessies vir besoekers aan en word deur Di Heesom-Green besit en bestuur.*

*Dit is ook die sameroeper van die Paternoster-kunsroetes. Die roete loop ook nog langs die galerye van Uro Erichsen, Wayne en Sandy Attrill, Wilko Roon en Linda Tsanga.”*

*Translation: “You already know about Paternoster’s delicious sea food, but did you know that this fisherman’s village is also a hang-out for art lovers? The Paternoster Art Route is 2,5 km long where beautiful art and sculpture creations, as well as fantastic photography can be found.*

*The following galleries are included: The At Botha art gallery, Magda Art, Ceramics and Stone Fish Studio and Gallery. The studio presents classes and work sessions to visitors and is managed by Di Heesom-Green.*

*The studio is also the convener of the Paternoster art routes. This route also includes the galleries of Uro Erichsen, Wayne and Sandy Attrill, Wilko Roon and Linda Tsanga.”*



[https://www.netwerk24.com/Weg/Nuus/25-lekker-dinge-aan-die-weskus-20190610?fbclid=IwAR0Ovp\\_LrEKc4dfZQPFKsVainAFQKOlgrifDwwiqiifpOGfRseKvJDOgT6s](https://www.netwerk24.com/Weg/Nuus/25-lekker-dinge-aan-die-weskus-20190610?fbclid=IwAR0Ovp_LrEKc4dfZQPFKsVainAFQKOlgrifDwwiqiifpOGfRseKvJDOgT6s)

Regarding West Coast One, see the newspaper article where Paternoster residents described themselves as being “bullied” by government and developers forcing the wind farm development to be erected so close to a tourist destination as well known as Paternoster.

See newspaper article:

## *An ill wind blows in Paternoster*

**Fiona Macleod** 21 Apr 2011 00:00



*“Residents of scenic fishing village Paternoster on the Cape West Coast are in high dudgeon over plans to erect hundreds of wind turbines as part of a scramble to meet the government’s renewable energy targets.*

*Environmental authorisation has been granted for 55 turbines at Paternoster, north of Saldanha Bay, and locals say they fear at least 200 more are in the pipeline.*

*The Paternoster project, called West Coast One, is the first of numerous commercial wind farms planned along the coastline from Darling to*



*Namaqualand. It is being implemented by Moyeng Energy, jointly owned by Investec Bank and French multinational energy company GDF Suez.*

*Keri Harvey, an environmental writer who lives in Paternoster, said residents object to the giant turbines being placed in their backyard because of the noise they make, their visual impact and their effect on the natural and historical heritage.*

*“We have no problem with green energy, but why place the turbines in the oldest and most beautiful, traditional fishing village on the West Coast? The wind farms should be moved away from civilisation and tourist attractions,” she said.*

*Local businessman André Kleynhans said companies are buying land close to the coastal towns for wind farms with an eye to capitalising on renewable-energy reimbursements from the national energy regulator as well as internationally funded carbon offset programmes.*

*“We are being bullied into this. There’s lots of wind further inland, where farmers are struggling, and hundreds of kilometres of uninhabited coastline that would be more suitable,” Kleynhans said.*

*Paternoster’s ill winds are the first sign that government plans to increase renewable energy to 42% of new power—with wind providing 6%—and may lead to similar friction with the local green lobby as those occasioned by Europe’s “wind rush” in the past decade.*

*Objections to the thudding vibration of the turbines and links to health problems such as headaches, anxiety and nausea have led to the United Kingdom, Denmark, Holland and Germany scaling down ambitions to combat fossil fuel-fired climate change by using wind energy.*

*Paternoster’s natural stone houses and village atmosphere draw tourists, who generate about R100-million a year and at least 500 jobs. It is also home to well-preserved neolithic heritage sites at Kasteelberg.*

*With nearby Britannia Bay and Vredenburg—where more wind farms are planned—the town forms part of the proposed West Coast Biosphere Reserve. The*



*sleepy fishing villages attract retired people “who want to walk on quiet, safe beaches”, Kleynhans said.*

*Residents of Britannia Bay expressed concern about the impact of construction and access roads to a wind farm proposed by Terra Power Solutions. The planned site is designated a critical biodiversity area, with limestone strandveld and two other endangered endemic vegetation types.*

*They are worried the 100m-high wind towers will cause fatal collisions with endangered bird species found in the area, which include blue cranes, Ludwig bustards, greater flamingos, secretary birds and a variety of seabirds.”*

It is clear that Paternoster residents are not at all happy with West Coast One, so would be even more disgusted at the development of another wind farm with turbines so closely placed, the term “forest effect” comes to mind.

So how can the presented study of property values being affected or not, by J.F. du Toit, PROPERTY EVALUATION STUDY REPORT of 27 July 2018 even TRY to convince us that our properties would be higher in value, or even easily sold with the close proximity of the 45 wind turbines forming this typical “forest effect,” with mitigation on a much smaller area and combined with West Coast One? No, we are NOT convinced!

Objections raised by me during the former Savannah Environmental company’s EIA were ignored in the recent proposal, convincing me that the developers and assessors have NO concern for us as residents and view our objections as irrelevant!

See previous objections:

*“The most important issues that are likely to be raised and will need to be assessed during the EIA include:*

Local communities and individuals

- *Potential impact on rural sense of place (this will be closely linked to the visual impacts);*



- *Potential negative impact on tourism, both locally and regionally (this will be closely linked to the visual impacts from routes currently serving a scenic/ touristic function, specifically the MR 533 and R 399);*
- *Potential impact on property prices in the area;*
- *Influx of job seekers into the area during the construction phase. The influx of job seekers may result in an increase in sexually transmitted diseases, including HIV/AIDS; increase in prostitution; increase in alcohol and drug related incidents; increase in crime; and creation of tension and conflict in the community;*
- *Traffic impacts associated with the construction phase and impact on local residents and tourists;*
- *Cumulative impact, specifically visual and associated impact on rural sense of place and the landscape character of the area;*

#### Farmers on and adjacent to the WEF site

In terms of potential impacts on local farmers in the area the following issues will need to be assessed:

- *Potential threat to farm safety due to increased number of people in the area and construction workers;*
- *Potential damage to farm infrastructure (during the construction and operational phase);*
- *Potential damage to roads by heavy equipment and increased traffic volumes (during the construction and operational phase);*

#### Tourism as key economic growth sector

The key tourist attractions include annual wildflower displays and the scenic beauty of the coastal settlements. The environmental setting plays a key role in both regards, and *protection of the landscape and scenic amenity are identified as pivotal to the region's tourism development strategy and management plan.* Marketing focus should be on promoting the SBLM as preferred eco-tourism destination in the West Coast region. Focus should be on the protection and development of the region's natural assets, especially in Paternoster, Langebaan and St Helena Bay. The siting of these projects are important from a spatial land use viewpoint in as far as large tracts of land are typically required to accommodate them. Furthermore, with regard to WEFs, *the turbines are typically visible over long distances.* The key principles reiterated include:

- *Excluding commercial WEF developments from areas with high aesthetic landscape value;"*



I had the opportunity to view the “Peer review of the bird impact study for the proposed Boulders Wind Farm, by Andrew Jenkins, AVISENSE Consulting, prepared in June 2019 for a group of concerned residents.

His comments were really disturbing, for instance: “p 25, para 5 lists “other wind energy projects present in or planned for the general area”. Are there any future plans to develop the NW half of the Vredenburg Wind Farms potential development area, perhaps as a second phase of the company’s overall development plan? If so, this intention should be openly acknowledged in the report and considered in assessments of possible cumulative impacts on the area’s birds.”

We fear that the Boulders Wind Farm would only be the second stage in a planned strategy to squeeze MORE wind farm development into our area, with these developer having no perception of our challenges in South Africa, living with crime and political instability and corruption. South Africa is NOT Germany or Holland or Denmark, we have a different set of challenges that those First World countries can not even comprehend.

The recommendations in the Bird impact study for the proposed Boulders Wind Farm had me stunned:

“Construction phase

- *Minimise areas of construction to the maximum extent possible;*
- *Clearing of natural vegetation during construction should be kept to a minimum;*
- *Proper training should be provided to all the construction personnel. Everybody working in the area should be aware of the sensitive areas and be alert to the potential impacts of the construction phase on the bird community;*
- *The removal of trees should be minimised and undertaken with extreme care due to its importance as roosting, nesting and as foraging habitat for birds.*
- *Structures should be designed to reduce the availability of perching sites in the area close to the turbines.*
- *All power lines linking wind turbines to each other and to the internal substation should be buried. In cases where this is not feasible, lines must be fitted with bird flight diverters and bird flappers and must be made visible especially during the night time. Eskom-approved bird friendly pole structures should be used.*
- *The use of guyed towers should be minimised and if necessary steps should be taken to increase the visibility of the guy wires through the use of markers, especially visible at night.*



*• No chemical spills or any other material dumps should be conducted within the intervention area, with special focus in areas nearby riparian vegetation or drainage lines. All the maintenance of vehicles must be carried out in specially designated areas to prevent any type of pollution on the area."*

*• Specific mitigation within the 2000m buffer around the Secretarybird nest:*

*An Environmental Control Officer (ECO) should use this opportunity to firstly identify if this nest is currently still in use or not – which will serve as important information for subsequent project phases. This ECO should also oversee the construction work and inform workers if there is a need to stop work (due to a risk situation), with specific reference to the secretarybird nest. If an ECO cannot oversee this task, then it will be compulsory for an avifaunal specialist to do so. Regardless, an appropriate avifaunal specialist should train the ECO in identifying risk situations.*

*This mitigation measure applies to the general breeding season of the species, but should place specific emphasis on the fledging period, which is estimated to occur between November and February. It also only applies to the buffered areas around the secretarybird nest. Where possible, construction work should preferably be planned to avoid these crucial periods."*

*"Operation phase*

*Considering that the hypothesis of bird fatalities occurring at the Boulders WF cannot be excluded, a monitoring plan is recommended during operational phase and, if significant mortalities are observed during this phase, then management actions should be put into action to mitigate fatality. Besides this, the following actions are recommended as a minimum:*

- Maintenance staff should be encouraged to keep noise and other disturbances to a minimum. If any confirmed nesting location of sensitive species is confirmed within the wind farm maintenance should take place outside of the breeding season of the respective species, if possible.*
- Maintenance staff should report bird mortalities through a formalised reporting system. This should be additional to formal carcass searches.*
- It is recommended that any sheep or cattle carcasses be removed from the surroundings of the turbines as soon as possible. This could attract carrion birds and some raptors that act as facultative scavengers.*
- Hunting of birdlife should be prohibited on site.*
- The utilisation of guyed infrastructures should be avoided (e.g. meteorological and communication towers) or if unavoidable, visible markers should be used to improve the visibility of the wires (APLIC 2012). Bird carcass searches around these structures should be included in the operation phase monitoring programme and conducted on a regular basis.*
- If turbines are to be lit at night, lighting should be kept to a minimum and should preferably not be white light. Flashing strobe-like lights should be used where possible;*



[https://www.youtube.com/attribution\\_link?a=07FxnT3i2Kc&u=%2Fwatch%3Fv%3DciYLA7n912o%26feature%3Dshare&fbclid=IwAR37Kpz9s3egimAYwYc5NdLdtrMMIUtQM4HX9jVbuDVXhkbiUIMLw-BR750](https://www.youtube.com/attribution_link?a=07FxnT3i2Kc&u=%2Fwatch%3Fv%3DciYLA7n912o%26feature%3Dshare&fbclid=IwAR37Kpz9s3egimAYwYc5NdLdtrMMIUtQM4HX9jVbuDVXhkbiUIMLw-BR750)

These are all ideas that seem to be wishful thinking on the part of the developers and environmentalists. I don't believe for one second this will really be practical and feasible in our country. Transnet was recently responsible for masses of young pink flamingo's being killed after colliding with their power lines close to the Kamfer Dam near Kimberley, because of bird flappers gone missing from these lines and never being replaced. Exactly the same will happen with the Boulders Wind Farm mitigation recommendations. This is South Africa!



*"Transnet did put up bird diverters along the lines, but not the entire length around Kamfers Dam. Since then many have fallen off or broken due to wear and tear (as expected) and others have slid to the middle of a section of line. So they are no longer effective and never really were 100% effective. Transnet has been negligent in its duty to check those diverters and to replace missing and broken ones with the most effective, newest diverters since 2012."*

[https://www.facebook.com/groups/18851482307/?ref=group\\_header](https://www.facebook.com/groups/18851482307/?ref=group_header)



Andrew Jenkins had other drastic problems with this bird study report, i.e.

1. *"The Secretarybird nest located within the potential development envelope was an important find of the study and is appropriately highlighted as an important component of the impact profile of the proposed WF. However, the buffer distances put forward – 500 m no-go and 2 km High Sensitivity – may not be sufficient considering the red-list status of the species, its wide-ranging nature, and the scarcity of known nest sites in the West Coast region. In my opinion the clearances around this site should be much larger – 2 km No-Go, 5 km - High Sensitivity...?"*
2. *p 43, para 8 makes reference to the findings of the Year 1 West Coast One post-construction bird study and concludes that this study found no significant impacts on birds. This was definitely not the case. In fact, the report (Jenkins et al. 2017) states that the collision rates of raptors at West Coast One were unacceptably high, possibly unsustainable, and warranted further intensive and dedicated research to determine causality and options for operational mitigation. The report fails to adequately acknowledge the severity of raptor fatality rates recorded at the nearby, operational West Coast One facility (Jenkins et al. 2017) and the strong likelihood that the Boulders WF will record similar numbers of collisions by birds of prey.*
3. *Also, the report refers to the lack of Blue Crane collisions reported at West Coast One but doesn't allow for the possibility that the Boulders development area supports much larger numbers of cranes and hence could feature an escalated risk of collision for this species.*

*In my opinion, these two failings render the Medium pre-mitigation impact rating for collision at Boulders as too permissive. West Coast One is already inflicting unpredicted and (as yet) unmitigated impacts on the birds of prey of the Columbine Peninsula (Jenkins et al. 2017)."*

4. *"The risk remains real and would surely be increased by the significant extension of the turbine-populated area on the peninsula resulting from the construction and operation of the proposed Boulders WF. Allowing for these concerns alone, it is difficult to see how the residual cumulative impact ratings for the Boulders project could be considered Medium.*

*Again, this finding suggests a bias towards development, a refusal to concede the possible importance of key uncertainties in the assessment process, and a failure to assess and report strictly in terms of the Precautionary Principle."*

*(Andrew Jenkins, AVISENSE Consulting, June 2019)*

These comments from Andrew Jenkins convinced me that the study reports presented by CES are NOT reliable, and that we should not TRUST any further



presentations from this Environmental impact assessment. Clearly they don't have our local environment's best interests at heart, and it's all about making money for the developers.

My suggestion: there are many other sites in our country that can be successfully developed as wind farms.

*"The potential to produce electricity from wind turbines in South Africa is significantly greater and much more widely spread than initially thought, a recent study by the Council for Scientific and Industrial Research (CSIR) reveals.*

*More than 80% of South Africa's land mass has enough wind resource for economic wind farms with very high annual load factors of greater than 30%;*

<https://www.csir.co.za/wind-power-potential-south-africa-par-solar-recent-csir-study-shows>

So it is difficult for me to understand why a beautiful, scenic, environmentally sensitive valley has to be offered on the altar of wind farm development, causing detrimental effects on the animal life, the property owners, the tourist trade, and the character of the surrounding peaceful fisherman's villages.

For job creation? Only 17 maintenance jobs in the 25 year term?

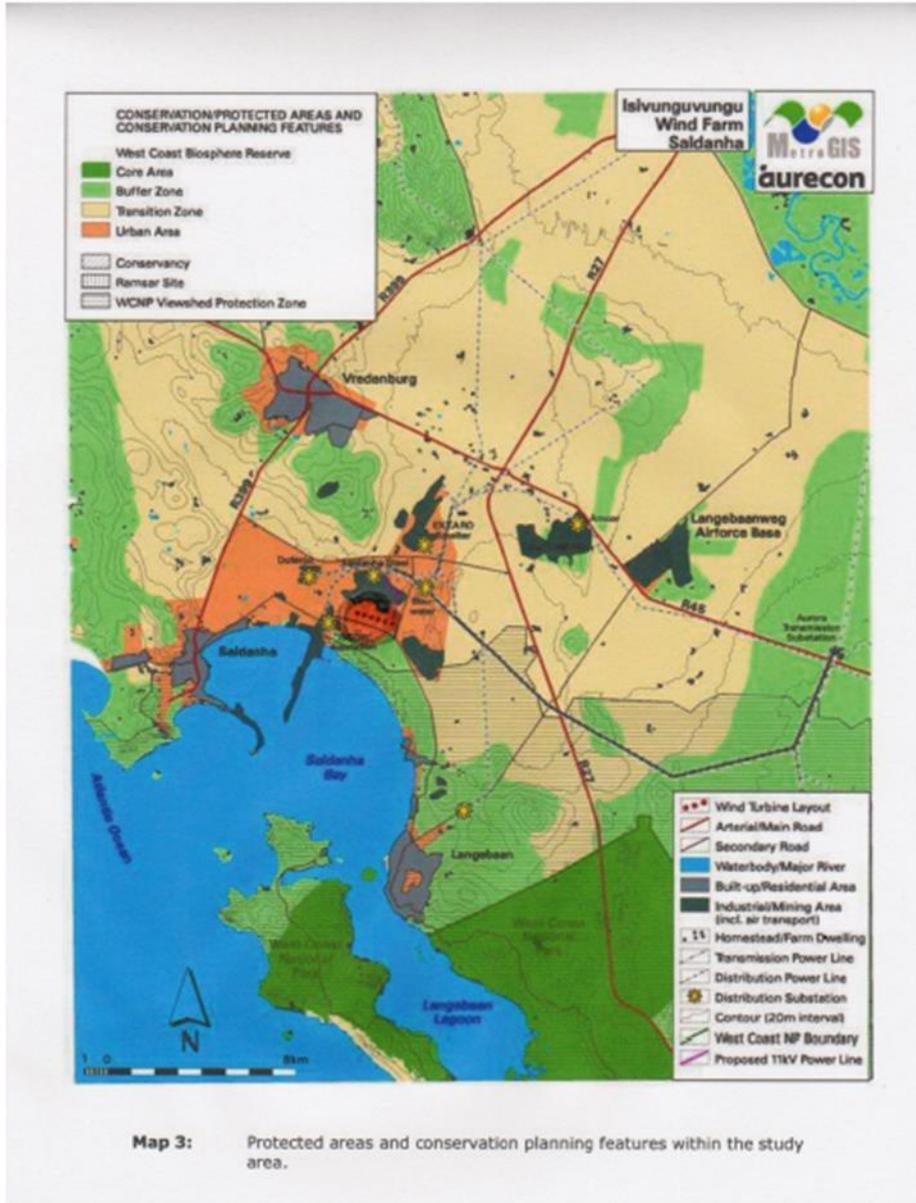
We have seen the outcome of industrial development in the Saldanha area. To me a much more acceptable site would be in close vicinity of Saldanha Steel, Duferco and the IDZ development areas on the outskirts of Saldanha. A wind Farm development of 6 turbines is already approved (although as residents of Saldanha we were never informed to register as Interested and Affected Parties of this development...)

*"The project is being pursued in partnership with Isivunguvungu Wind Energy Converter (I-WEC), which recently unveiled a 52-m mould, which will be used to manufacture wind turbine blades in Cape Town. The cost of a turbine produced at the I-WEC facility, including transport, foundation costs and erection on site, is currently estimated at between R15-million and R17-million a Megawatt."*

<https://www.engineeringnews.co.za/article/saldanha-steel-mill-supports-wind-energy-project-2011-12-06>

See map with layout of planned *Isivunguvungu* wind farm next to SaldanhaSteel, containing 6 turbines. ( Interesting to me is the West Coast National Park Viewshed Protection Zone marked on the map, where wind farm development HAS to consider the view from an environmental landmark, but in the Paternoster/St Helena Bay area the environmental No Go or Sensitive areas, or the Cape Columbine Nature Reserve, or the Groot Paternoster Private Nature Reserve are NOT protected from the viewshed of the proposed Boulders Wind Farm.)

The site of the 6 turbines is marked in red.



This site is perfectly suited to a wind farm development, as industry zoning has already damaged the surrounding land with the construction of Saldanha Steel, Duferco, and the Transnet Port Terminal's (TPT) Saldanha Iron Ore plant. Even from the hill in Saldanha town, nobody can claim an interrupted view of high scenic value or property values being affected!



See photograph taken from the hill in Saldanha across the valley. There is absolutely no comparison between the impact of a wind farm in this region and the scenic valley in the Paternoster / St Helena Bay vicinity.



**Conclusion:** It is not fair that we, as property owners in the St Helena bay area paying our property taxes, be ignored and bullied to accept a development that is detrimental to our property value, our environment by killing protected birds and bats, to the tourism industry in Paternoster, Shelly Point, etc., to our safety and peace of mind by causing more crime due to influx of desperate jobless people, and to our future plans and daily lives as retirees.

In our home in St Helena Bay, we have a solar power system saving electricity during the day and supporting us when Eskom has a power outage. This has convinced me that South Africans should rely more on these home solar power systems to be self sufficient and not rely on a bankrupt Eskom riddled with corruption.

South Africa has unique problems that hinder sustainable development on all fronts. Therefore to have trust in the fair consideration of the rights of this country's citizens, is impossible. Corruption and crime force law abiding citizens to try and survive whatever is thrown at them by politicians.



International Wind Farm investors in South Africa are dependent on Eskom's management, and wind farm developments can only be successfully implemented and sustained if all other parties are supporting the whole system.

Is this possible? I don't believe so.

See article by *Andrew Kenny* :

***Renewable energy is a disaster and will collapse SA's electricity supply system***

*Andrew Kenny 2019-04-12 02:01*

*"South Africa is lurching towards another electricity disaster to make the Eskom disaster even worse.*

*It comes from "renewable energy", which here usually means solar and wind.*

*These are excellent for off-grid uses, such as solar water heating, wind pumps on farms, and small electricity supply for households.*

*But they are useless for grid electricity (electricity on national electricity networks, such as Eskom's).*

*The sun never makes electricity when it is most needed – on winter evenings just after sunset.*

*With wind you never know when it will make electricity.*

*Both are staggeringly expensive and hopelessly unreliable.*

*South Africa has more than three years of data showing how bad solar and wind electricity is here.*

*This comes from REIPPPP – the Renewable Energy Independent Power Producers Procurement Program.*

*Under it Eskom is forced to buy extremely costly solar and wind power from independent power producers.*

*I have the production figures for REIPPPP. They are terrible, showing wild, unpredictable ups and downs in power production.*

*According to Eskom's latest annual report for the year ending 31 March 2018, Eskom's average selling price is about 89 cents/kWh (kilowatt-hour).*



*The average price it is forced to pay for renewable electricity is 222 cents/kWh – over double its selling price.*

*But this is the price Eskom pays for REIPPPP electricity; it is not the cost to Eskom, which is much more. This is because of the system costs.*

*The most important equation in costing renewable electricity: cost of renewable electricity = price of renewable electricity to the grid + system costs.*

*The system costs are the huge costs of incorporating the fluctuating, unreliable solar and wind power into the grid so that it can provide reliable electricity at the right frequency and voltage.*

*They include the back-up generators; the extra costs incurred by these generators ramping up and down to match the renewables and so using more fuel and incurring more stresses; spinning reserve (generators running at below optimum power); storage; extra transmission lines; and increased shut-downs caused by the renewables.*

*If the price of renewables to Eskom was 20 cents/kWh, the system costs would still make it prohibitively expensive.*

*We perhaps can get some idea of them by looking at the one honest renewable technology that covers its own system costs.*

*This is Concentrated Solar Power (CSP) with storage. The latest CSP plants charge Eskom about 500 cents/kWh at peak times.*

*This is probably something like the true costs to Eskom of wind power and solar PV (photovoltaic panels, making electricity directly from sunlight).*

*The system costs explain this paradox.*

*Week by week the greens tell us the price of renewable energy is coming down but all around the world the cost of renewable energy is going up.*

*It is far more costly than anyone predicted twenty years ago and getting worse all the time.*

*The system costs are ignored by green energy modellers.*

*A prime example is the absurd model devised by the Council for Scientific and Industrial Research (CSIR) and now used by IRP2018 (our statutory plan for sources of electricity until 2030).*



*Under this mad plan the "least cost option" is a mixture of renewables and a "flexible" energy source, meaning gas – which would be imported.*

*The renewable power companies are no doubt making a fortune by forcing us to buy their costly electricity. This is why their spokesmen campaign in our media for renewables.*

*After REIPPPP had proved an expensive failure, the then minister of public enterprises, Lynne Brown, ordered Eskom to sign up for 27 more of these ruinous renewable power contracts.*

*Malusi Gigaba, then finance minister, agreed.*

*Eskom has been wrecked with bad management, mad ideology, awful policy decisions and rampant corruption.*

*Our electricity supply system is heading for collapse. Forcing South Africa to abandon coal and nuclear for wind and solar will make it collapse altogether."*

*- Andrew Kenny is a professional engineer and a freelance journalist*

<https://city-press.news24.com/Voices/renewable-energy-is-a-disaster-and-will-collapse-sas-electricity-supply-system-20190412>

**More bad news:**

*"In 2018, Eskom purchased IPP power at an average cost of 222c/kWh. In the previous financial year, the power utility bought 11 529GWh of energy from IPPs at R21.7 billion, at an average cost of 188c/kWh.*

*Eskom's general manager for energy trading, Callie Fabricius, explained the IPP programme is a government decision with limited Eskom participation in deciding which IPPs to buy from and the prices paid to it.*

*"In terms of Regulations of Electricity Regulation Act, the minister of energy makes a determination that Eskom becomes the buyer of energy from IPPs. And regulation says we must implement this," he said.*

*Fabricius added that the output of IPPs to the system will increase from this year to the end of the MYPD period by 64%.*

*"Even though the relative cost of particular technologies is decreasing over time, Eskom costs associated with renewable IPPs will continue to increase due to commitments from the earlier bid windows."*

<https://www.itweb.co.za/content/Gb3Bw7WoDRk72k6V>



We are part of a group of concerned residents willing to fight tooth and nail, using all our resources to fund resistance and stop this development or have it moved to another, more acceptable site with less detrimental impact. Petitions are circulating in St Helena, Shelly Point and Paternoster for signing by everyone opposed to the Boulders Wind Farm Project.

I hope that this time our objections are valued and considered, and that the survival of our beautiful West coast towns are more important than handing over our resources to international developers and a few farmers on a mission to make millions.

**WHY WE SAY  
NO, NEE, HAYI  
TO BOULDERS WIND FARM**

*The proposed Boulders Wind Farm will not lower the cost of electricity or prevent load-shedding on the west coast. What it will do is dominate the landscape, dwarfing the 47 turbines already installed at West Coast 1. The combined impact of the two wind farms will be disastrous for this area for many reasons, including:*

- Growing numbers of tourists and residents visit the West Coast Peninsula to enjoy its rich culture and natural scenic beauty. The visual and environmental impact of a second massive wind farm with much taller turbines will deter visitors. Hotels, guesthouses, shops and restaurants that welcome holidaymakers and residents to Paternoster, St Helena Bay and all the surrounding areas will lose business and income. Retrenchments will follow and thousands of permanent jobs will be lost. Thousands more will never be created.
- The proposed Boulders Wind Farm will create less than a handful of local jobs. All turbines will be imported. Local workers will be able to apply for short-term contract work during the two-year construction phase. For the next 20 to 25 years, no more than 17 permanent jobs will be available.
- Tens of thousands of birds, including many critically endangered ones, use the peninsula as a flyway between Langebaan or the West Coast National Park and the Berg River mouth. Too many birds are being killed by the existing turbines. Adding more and much larger turbines will be catastrophic. The loss of more birds will also put millions of other creatures and plants at risk.

Yes, Eskom is in crisis and the shift to clean energy is essential. However, it makes no sense to fill this unique and tiny peninsula with wind turbines where they will cause unemployment and endanger millions of life forms.

Alternative sites exist that offer the same energy benefits but create less social and environmental havoc. These must be explored.

***Please sign the petition available at the St Helena Bay Library***  
**Let's not blight the land that feeds us!**

*Colin De Kock*

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 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 censussing 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 m<sup>3</sup> (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 m<sup>3</sup>. 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 m<sup>3</sup>/linear meter of road construction, that is 6000 - 9000 m<sup>3</sup>/ 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 m<sup>3</sup> at 10 m<sup>3</sup>/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  
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P.O. Box 597  
St Helena Bay  
7390

*Engels, Louis*

***(Translated into English below)***

**From:** Louis Engels [<mailto:drengels@mweb.co.za>]

**Sent:** Monday, 01 July 2019 11:45

**To:** Louise Van Aardt <[info@cesnet.co.za](mailto:info@cesnet.co.za)>

**Subject:** Brittanica Heights Boulders Windplaas

Dear Louise,

About proposed Boulders Wind Farm

I would like to object to the development of the intended Boulders Wind Farm for the following reasons:

1. Negative visual impact

- I own a house on a smallholding at Brittanica Heights with unobstructed views of Paternoster and the sea. The construction of wind turbines will undoubtedly have a negative impact on my view.
- The peaceful rural atmosphere will definitely be disturbed.
- The height above the horizon of the turbines and its movement will lead to serious obstruction of my view.
- The flashing lights day and night will be seriously disturbing.

2. Economic impacts

- There is no chance of increasing the value of my property through the proposed development - only reduction.

So I stand seriously against the above development.

Sincerely

Louis Engels

*Adendorff, Barbara*

From: Country Cabin St Helena Bay <[countrycabinsthelenabay@gmail.com](mailto:countrycabinsthelenabay@gmail.com)>

Sent: Wednesday, 26 June 2019 15:00

To: Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>



Subject: Boulders Windfarm

Dear Maura,

Re: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT BOULDERS WIND FARM I herewith enclose my objections as an affected and interested party regarding the above as follows:

1) The proposed Wind Turbines have a direct highly negative visual effect on the properties of Britannica Heights.

We bought our properties here because of the uninterrupted views of the natural/rural environment.

2) The continuous flashing lights day and night of the proposed Wind Turbines and the acoustic impact is altogether detrimental to our health.

3) The natural beauty and bird life of this area would be replaced with a forest of moving structures of a height that is higher than all the buildings in Cape Town.

4) Our Properties's will drop drastically by approximately 80% and we would insist on compensation with the help of legal advice.

5) Our Tourism Business would drop to zero. Who on earth would book a holiday looking on to flashing lights day and night?? Again we would insist on compensation for the loss of business for our B&B's and self-catering establishments.

6) We therefore suggest that you relocate your planned Wind Farm by continuing the expansion of the Westcoast One Turbines to the area of the R399, where there is no interference to residential areas and it would be financially more viable as it would be next to an already established road.

Kindly confirm the receipt of my objection.

Kind regards,  
Barbara Adendorff  
32 Columbine Crescent, Britannica Heights, St Helena Bay.

---

From: Country Cabin St Helena Bay <[countrycabinsthenabay@gmail.com](mailto:countrycabinsthenabay@gmail.com)>  
Sent: Tuesday, 02 July 2019 16:32  
To: Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
Subject: Proposed Boulders Windfarm

Dear Maura,

I the undersigned am the husband of Barbara Adendorff, the owner of Erf 1792, Britannica Heights, which overlooks the proposed Windfarm .

Here are my comments:

1) Visual Effects: if implemented, the Windfarm would totally destroy the view from our property over the farmland towards Paternoster and the tranquility of the area, which is the main reason why we settled here. When Eskom for example planned the extension of their power line to Stompneus Bay, a prospective buyer of the plot adjacent to ours withdrew his offer. Following objections from plot owners of Britannica Heights, Eskom rerouted the



Power line along the valley on the adjacent farm. The visual impact of the proposed Wind farm would be INFINITELY WORSE THAN THE POWER LINE.

2) Health Effects: in terms of the WHO:

“Wind energy projects have profound implications for people who live close to Windfarms , including annoyance and sleep disturbances “.

“ Developers and Policy Makers should engage seriously, honestly, open and inclusively with affected communities “ “Wind Turbines emit noise at sufficient levels to propagate over large distances.”

The National Research Council, Energy projects 2007 NRC , Washington DC:

“Wind Energy projects create negative impacts on human health and wellbeing “ The proposed Wind farm is therefore totally unacceptable.

3) Alternatives: In terms of the NEMA EIA Regulations all Scoping Reports must contain a description of any reasonable alternative and comparable Assessment.

In this regard I wish to point out that there are alternative sites which are out of sight of property owners. Another alternative would be solar power.

A.M. Adendorff

Registered I&AP

*Ralphs, Mary*

**From:** mary <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
**Sent:** Thursday, 16 May 2019 16:43  
**To:** Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
**Subject:** Re: Boulders Windfarm PPP Advert  
 Dear Maura

With reference to the advert in Appendix A of the Draft EIA, the deadline for written comment is 21 June, but the email sent today gives this date as 18 June.

Please clarify.

Assuming 21 June is the correct date, holding the public meeting on 19 June, allows IAPs just two more days to submit comments.

This seems exceptionally tight. Please let me know what the regulations are around timing?

With thanks

Mary Ralphs (registered IAP)

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**From:** mary <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
**Sent:** Wednesday, 22 May 2019 20:20  
**To:** Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
**Cc:** Barbara Adendorff <[countrycabin@telkomsa.net](mailto:countrycabin@telkomsa.net)>; Portsmouth <[DougandGay@portsmouth.co.za](mailto:DougandGay@portsmouth.co.za)>; Anne Todd <[toddbat@iafrica.com](mailto:toddbat@iafrica.com)>; Engels <[annelineengels@gmail.com](mailto:annelineengels@gmail.com)>  
**Subject:** Re: Boulders Windfarm PPP



Dear Maura

Thank you for getting back to me and for providing clarity on the deadline for responses. The turnaround time still seems exceptionally short given the amount of text we have to wade through, and especially as we thought the process of drawing up the EIA and commissioning the specialist reports was all placed on hold while the legal appeals were underway.

It is disconcerting to find that this process all merrily continued behind the scenes, as we were led to expect that IAPs would have opportunities to give input to the specialists while they conducted their research and evaluations.

In terms of a meeting with residents of Britannica Heights, I think it would be best if you arrange a venue in St Helena Bay (perhaps at the hotel or civic centre?) and then notify all the Britannica Heights IAPs about it. There are quite a number of us now and we are unlikely to fit in anyone's lounge. It would be unfortunate if residents were prevented from attending because the venue is not large enough. This is, in fact, precisely what happened when Savannah last organised a meeting for residents of the Heights. We were asked to keep numbers small and then they arrived with a large contingent that all but outnumbered the locals. We sincerely hope CES won't resort to this kind of bulldozing.

Thank you for offering to respond to queries via email in the meantime. I do have a question related to the visual impact of the turbines.

I am sure you are aware that the proposed wind farm has been on the cards for some years and IAPs have had to engage with it several times. Each time, we have asked that a set of photographic images be provided showing the site landscape with a mock up of accurately placed and sized turbines superimposed on it. Given that the visual impact will be high, we think we have a right to be given a pretty good idea of what the turbines will look like from Da Gama Road and Columbine Crescent in Britannica Heights, but also from St Helena's main through-road, the entrance to Paternoster, the marina at Veddrif, etc.

At the scoping document stage, we were told that such mock-ups could not be provided because the placement of the turbines had yet to be determined.

Now that a definite proposal around turbine placement is in place, please could CES provide and circulate these images as a matter of urgency. They are a vital and very basic piece of visual information and we are astonished that they have not been included in the EIA.

Regards

Mary

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From: mary <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>

Sent: Thursday, 23 May 2019 11:05

To: Louise Van Aardt <[info@cesnet.co.za](mailto:info@cesnet.co.za)>; Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>

Subject: Re: Boulders Windfarm I&AP Public Review Extension

Dear Maura

I missed this email yesterday. It is utterly disingenuous to frame the correcting of the contradictory dates on CES's documents as an "extension of the review period".

I know some of us like to live in a post-truth world but, really?



What I originally asked for was some information about what the regulations are for the public review period. Please could you clarify what the minimum and maximum periods are?

Regards

Mary

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From: mary <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
Sent: Friday, 24 May 2019 15:07  
To: Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
Cc: Peter Pickford <[pbpickford@gmail.com](mailto:pbpickford@gmail.com)>  
Subject: Re: Boulders Windfarm I&AP Public Review Extension

Dear Maura

Since CES have allocated the legal minimum amount of time to the review period, I would like to request that this be extended to 31 July.

Failing that, I would like to add my support for Peter Pickford's request that you take into account that many of the IAPs likely to be most directly affected by the wind farm work in the hospitality industry and will be extremely busy from 14 to 18 June because of the June 16 public holiday, and beyond that until 8 July because of school holidays.

It seems only reasonable that this be taken into account. If a real (as opposed to a fake) extension is not possible, please supply reasons for this.

Sincerely

Mary

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From: mary <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
Sent: Monday, 10 June 2019 20:11  
To: Michael Johnson <[m.johnson@cesnet.co.za](mailto:m.johnson@cesnet.co.za)>  
Cc: Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
Subject: Re: High resolution images of the Boulders Wind Farm

Dear Michael

With respect, relocating seven turbines might make you feel better but is going to make zero difference to how much damage the turbines do on several levels if the project is allowed to go ahead.

Please do send me the other images. I will make sure that people I show them to know that the layout they show is not final.



The problem with the set that I have is that they are not comparatively sized - the turbines are closer to Britannica Heights than to Paternoster but the size of the turbines shown is smaller.

I want to see if the earlier set is more accurate.

Thanks and all the best

Mary

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**From:** mary <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
**Sent:** Monday, 17 June 2019 18:50  
**To:** Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
**Cc:** Michael Johnson <[m.johnson@cesnet.co.za](mailto:m.johnson@cesnet.co.za)>; [mark@egelliott.co.za](mailto:mark@egelliott.co.za); Portsmouth <[DougandGay@portsmouth.co.za](mailto:DougandGay@portsmouth.co.za)>; Anneline Engels <[annelineengels@gmail.com](mailto:annelineengels@gmail.com)>; Anne Todd <[toddbat@iafrica.com](mailto:toddbat@iafrica.com)>; Barbara Adendorff <[countrycabin@telkomsa.net](mailto:countrycabin@telkomsa.net)>  
**Subject:** Re: BRITANNICA HEIGHTS IAP'S BOULDERS WIND FARM FOCUS MEETING - WEDNESDAY 19TH JUNE 2019

Dear Maura

Several key residents have indicated that they are unable to make either of the meetings to be held this coming Wednesday.

Is there any chance of CES changing the date and time to accommodate them? Ideally we would like an event to be held either on a weekend or from about 5.00pm on a weekday.

In addition, if only one hour is to be allocated for this meeting, we would like to request that CES limit their presentation to no more than 20 minutes.

Most residents have have heard four or five such presentations since 2010 so we don't really need to hear the general and basic information again. We would, instead, like to focus on specific questions and would appreciate it very much if you could comment on the following in your presentation:

- 1) Why have you not considered any alternative sites in this immediate area - please bring a slide that shows an accurate wind map and the exclusion zones linked to the airfield etc. to elucidate your response.
- 2) Why are all the objections we and others made to the scoping report absent from the draft EIA, while letters of support from the farmers involved etc, are included?
- 3) Please clarify the process from this point onwards, that is: what are the time constraints? to whom do we address our objections to the final EIA? if the final EIA is approved by the Dept of Environment, what other agencies still have to give their approval, and to whom do we appeal?
- 4) Why are two visual impact studies included in the draft EIA and why does the main report largely ignore the findings of the LOGIS study?



5) The heritage report states: "Impacts anticipated as a result of the proposed WEF to visual character and sense of place are not possible to mitigate. There is also no mitigation to ameliorate the negative visual impacts on tourist access routes and tourist destinations within the region." Please clarify why the conclusions of the main report ignore these statements.

6) The author of Appendix 9 on property values appears to be entirely unaware of Britannica Heights, and fails to mention the area even once in his report. Please clarify how this can be rectified?

7) Are you aware of other wind farm proposals in South Africa that have been successfully relocated and how was this achieved?

With many thanks

Mary

From: Maura Talbot  
Sent: Tuesday, 25 June 2019 16:13  
To: 'mary ralphs' <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
Subject: RE: Follow up from Britannica Heights focus group

Dear Mary

See my responses to your questions below in capitals.

Regards

Maura

-----Original Message-----

From: mary ralphs <[maryralphs@mweb.co.za](mailto:maryralphs@mweb.co.za)>  
Sent: Tuesday, 25 June 2019 15:20  
To: Maura Talbot <[m.talbot@cesnet.co.za](mailto:m.talbot@cesnet.co.za)>  
Cc: Portsmouth <[DougandGay@portsmouth.co.za](mailto:DougandGay@portsmouth.co.za)>; Georges Schleger <[ve2ek@yahoo.ca](mailto:ve2ek@yahoo.ca)>;  
Anneline Engels <[annelineengels@gmail.com](mailto:annelineengels@gmail.com)>; Anne Todd <[toddbat@iafrica.com](mailto:toddbat@iafrica.com)>  
Subject: Follow up from Britannica Heights focus group

Dear Maura

Arising from the meeting held with Britannica Heights residents last week, please could you respond to the following issues:

1) The proposed hub height of the turbines: the main report mentions the maximum height of 120m, but at the meeting, reference was made to the fact that they will be "not much higher" than the existing turbines at West Coast 1. Please provide the accurate hub height and indicate where in the draft EIA this information provided.

THIS INFORMATION IS IN THE PROJECT DESCRIPTION SECTION 2.2.1.



2) Similarly, there is some confusion about the turbine layout; please could you confirm that the final proposed turbine layout is as per the draft EIA.

SEE ATTACHED KML FILE WITH LOCATION OF TURBINES ON GOOGLE EARTH. SEE ALSO FIGURE 2-4 ON PAGE 21.

3) As noted during the meeting, a slide that contained a table summarising the social impacts of the wind farm was illegible to participants. Please send us a copy of that slide.

SEE ATTACHED WORD DOC

4) Please also email us a copy of the poster that summarised the proposed shareholding in the wind farm. You might remember that one of the development team tried to hold this up against the wall at the meeting, but the information it contained was too small to be visible from where we were sitting. SEE ATTACHED POSTER.

5) During the meeting, one of the residents questioned why none of your reports deal with the health impacts related to very low frequency sound generated by wind turbines. One of the members of your team undertook to send us some further information about this. IT WAS THE CLIENT WHO MENTIONED THIS. I WILL NEED TO SOURCE THAT FROM THEM AND SEND LATER.

6) We have found little reference in the draft EIA to post-construction monitoring of bird and bat fatalities at the West Coast 1. Although we are now aware that this information is available and it seems logical that it should have informed both the scoping report and the draft EIA. Please could you indicate if the findings from these reports have studied and where in the draft EIA this information is reflected?

THIS MONITORING DATA WAS REVIEWED BY THE BIRD SPECIALIST AND IS DISCUSSED IN THIS SPECIALIST REPORT. See page 6.

7) While you responded briefly to the emailed question about timeframes, please could you put this in writing as well? That is,

\* When must the final EIA be ready? WE HAVE UNTIL OCTOBER AT THE LATEST TO SUBMIT BUT WILL SUBMIT WHENEVER IT IS FINISHED. WHEN THAT WILL BE DEPENDS ON THE AMOUNT OF TIME IT TAKES TO ADDRESS ALL THE COMMENTS AND FINALISE THE REPORTS WITH INPUT FROM THE SPECIALISTS AND THE CLIENT.

\* If the final EIA is approved by the Dept of Environment, what other agencies still have to give their approval, and by when? ALL THE OTHER REGULATORY AUTHORITIES WILL BE SUBMITTING COMMENTS AS PART OF THE PUBLIC REVIEW PROCESS. IF THE DEVELOPERS RECEIVE ENVIRONMENTAL AUTHORISATION, THEY WILL STILL HAVE TO SUCCESSFULLY GO THROUGH A COMPETITIVE BIDDING PROCESS FOR THE IPPPP WHICH IS CURRENTLY ON HOLD.

\* To whom would we appeal against such approval and within what timeframe would we have to do so?



THERE IS A SPECIAL APPEALS BODY FOR EIA'S. CES WILL NOTIFY YOU OF WHO AND WHERE TO SUBMIT YOUR APPEAL WHEN WE NOTIFY YOU OF THE DEA DECISION ON THE APPLICATION FOR AUTHORISATION. WE HAVE TO NOTIFY ALL IAPS ABOUT THE DECISION WITHIN 10 DAYS OF RECEIPT OF SUCH. ANYONE WISHING TO APPEAL WILL THEN HAVE 20 DAYS TO SUBMIT AN APPEAL. THE APPEAL PANEL THEN HAS 60 DAYS TO MAKE THEIR DECISION.

As you are aware the 2 July deadline is fast approaching so we would appreciate your response to these questions as soon as possible.

Yours sincerely  
Mary



Ms Maura Talbot  
Principal Environmental Consultant and Socio-Economic Specialist  
CES  
The Point, Suite 408, 4th Floor,  
76 Regent Road, Sea Point,  
Cape Town, 8060

30 June 2019

Dear Ms Talbot

Re: Response to Draft Environmental Impact Report for the proposed Boulders Wind Farm Energy Facility, DEA Reference: 14/12/16/3/3/2/1057

News of the publication of the draft EIA for the controversial Boulders Wind Farm was delivered to IAPs on 16 May 2019 with notice that we had until 18 June 2019 to respond – two days more than the legal minimum prescribed for a public participation process. On appeal, CES reluctantly extended this review period by 11 days. From the correspondence between you and I, as well as the exchanges we had at the two St Helena Bay meetings and on the telephone, it was apparent that CES was attempting to go through the motions of holding public meetings but can in no way be considered to have made sure that these were advertised in ways that the local community would be likely to respond to or held at times that would be convenient for them to attend.

According to Section (2)(4)(f) of NEMA, the participation of all interested and affected parties (I&APs) in environmental governance must:

- be promoted and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.

Further, the DEA's 2017 *Public Participation Guideline in Terms of NEMA EIA Regulations*, makes clear that the DEA's expectation is that public participation be 'vigorous and inclusive'. Under Point 1, the guidelines note that:

- at a minimum', and among other things 'the PPP undertaken *must* allow for the following:
  - to enable the person conducting PP to incorporate the *needs, preferences and values of potential or RI&AP's into its proposed development* that becomes the subject of an application for an environmental authorization (EA);
  - to provide opportunities for clearing up misunderstandings about technical issues, resolving disputes and *reconciling conflicting interests*;
  - to *encourage transparency and accountability in decision-making*;
  - to *contribute toward maintaining a healthy, vibrant democracy* (emphasis added)

Point 4 of the same document continues:

All potential and I&APs have a right to be informed early and in an informative and proactive way regarding proposals that may *affect their lives or livelihoods*. Early communication can aim to build trust among participants, allow more time for public participation, and *improve community analysis and increases opportunities to modify the proposal in regards to the comments and information gathered during the PPP*.

The level of public participation must be at a minimum be informed by –

- the scale of anticipated impacts of the proposed project;



- the sensitivity of the affected environment and the degree of controversy of the project; and
  - the characteristics of the potentially affected parties.
- (emphasis added)

Please indicate how the notion of 'values' (as in morals, ethics, ideals, principles as opposed to monetary value) enters any of the documentation or public discussions held regarding Boulders Wind Farm?

In what way has your PPP endeavoured to 'reconcile conflicting interests'?

Where is 'transparency' when the details of how the farmers are going to benefit from this scheme are carefully censored?

Where is 'accountability' when all you offer the local community is 17 long term jobs and a profit-dependent corporate social responsibility programme, and when you have not taken the time to quantify the size, nature and growth potential of those local business sectors in Paternoster and St Helena Bay that could be negatively impacted, thus putting a (very considerably) higher number than 17 jobs at risk.

Where is 'accountability' when you knowingly endorse a proposal to plant another 45 massive turbines in the direct flight path of thousands of birds? How do you calculate the number of acceptable bird and bat fatalities without even mentioning, much less evaluating, the millions of other creatures up and down the food chain that are put at risk in this area by these wholly unnecessary deaths? Oh yes, humans don't yet fully understand biodiversity, or how the rapid extinction of species, particularly on this peninsula, might impact our future survival. Yet the assumption seems to be, let's kill them now anyway and picket the profits, and someone someday will find a new technology that will solve the problem later.

Where is your contribution to a healthy vibrant democratic process when you schedule a focus group during working hours on a week day? Then, when no one turns up, you reconvene another event, giving potential participants one day's notice? When again, fewer than 20 people pitch up and only about five of those are from the communities in Laingville, Steenberg Cove and Stompneusbaai that you were targeting, you claim you don't know how to reach people in those areas? Do you not then think that your PPP is not working and perhaps you need to take a little time to rethink your process?

More importantly, where is your contribution to a healthy vibrant democracy when you use 'focus groups' to play into the West Coast community's social divides, assuming, for example, that none of residents of Britannica Heights had any interest in hearing the views of those in Laingville or Steenberg Cove? How can you, as an EAP, assume that different communities across the peninsula share no common interests? And having made this assumption, how can you endorse a proposal to whack a massive industrial scale development onto the landscape, knowing that it has the potential to radically change the nature, the economic base and the culture of this area, without even attempting to facilitate any public conversation about these issues?

These are lives and livelihoods you are dealing with: about 15 000 human lives and livelihoods across the peninsula, and an incalculable number of non-human lives. Is this not sufficient to warrant an inclusive and mindful PPP? Is the scale of anticipated impacts, the sensitivity of the affected environment and the degree of controversy of the project not large enough; or is it the rural character of the potentially affected parties that warrants such cursory haste and disrespect?

In framing your response, please review the following documents attached: