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Attention:

Ms Fatima Rawjee and Mr Mahlatse Shubane
Department of Environmental Affairs
CD: Integrated Environmental Authorisations
Directorate: Integrated Environmental Authorisations

14 August 2012

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Dear Madam and Sir

CALEDON WIND FARM ENVIRONMENTAL IMPACT ASSESSMENT (EIA) (DEA Ref. No.: 12/12/20/1701)

Following your meeting with Caledon Wind (the Applicant) on 18 July 2012, it is understood that in order for the Department of Environmental Affairs (DEA) to consider the Environmental Authorisation for this project, a request was made that the concerns of CapeNature and the Western Cape Department of Agriculture (WCDoA) be addressed.

The Applicant met with Ms Samantha Ralston, Manager, of Scientific Services CapeNature in Stellenbosch on 25 July 2012 regarding the CapeNature concerns. A written response was hand delivered to Ms Ralston on 30 July 2012. A copy of this response was forwarded to the DEA on 6 August and is attached. In this response, the Applicant has agreed to remove all the contentious turbines as indicated by the Avifauna and Flora (Botany) specialists and to commit the Renosterveld on the proposed land to the CapeNature Stewardship program.

The Applicant has also had a meeting with the WCDoA on 6 and on 9 August 2012. At the meetings the WCDoA stated their concern regarding the placement of turbines in agriculturally productive land.

In order to submit in Round 3 of the IPP Procurement Programme process the Applicant requires feedback by 15 August 2012 as to whether a positive or negative decision will be received. The reason is that a positive Environmental Authorisation has become a condition from various service providers and shareholders before resources are committed to bid submission preparation. With this in mind, the Applicant respectfully request that you indicate by return mail whether this would be possible.

This letter provides the consolidated responses to the issues raised by CapeNature and the WCDoA as well comments received by the DEA.

**1. WESTERN CAPE DEPARTMENT OF AGRICULTURE (WCDoA), LETTER TO DEA 1
APRIL 2012**

Western Cape Department of Agriculture Comment (1.1)

Many of the proposed wind turbine sites are on actively cultivated lands in a region considered to be the best winter small grain producing areas in the Western Cape and on slopes that varies moderately steep to steep and that were contoured with government subsidies for the purpose of preventing soil erosion and food security.

The regulations set out by the National Department of Agriculture, Forestry and Fisheries specifically states: *No renewable energy structure, its foot print service area supporting infrastructure or access routes in any form or for any purpose will be allowed on areas currently being cultivated (cultivated fields/ production areas) or on land that have been cultivated in the last ten years. This relevant to cultivated land utilized for dry land production as well as land under any form of irrigation.*

Due to the above and the cumulative impact of the total development the Western Cape Department of Agriculture cannot support the application.

Please Note:

- That this is only a recommendation to the relevant deciding authorities in terms of the Subdivision of Agricultural Land Act 70 of 1970, the Conservation of Agricultural resources Act no 43 of 1983 and the Land Use Planning Ordinance 15 of 1985.
- The Western Cape Provincial Department of Agriculture reserves the right to request further Information and revise initial comments based on any additional information that might be received.

Response to Western Cape Department of Agriculture (1.1)

Subsequent to receiving the comments from the WCDoA, three months after the submission of the Final EIR (Environmental Impact Assessment Report), the Applicant has had two meetings with the WCDoA on 6 August and on 9 August 2012. At the meetings the WCDoA stated their concern regarding the placement of turbines in agriculturally productive land. Although it is important to the Applicant to address the concerns of the WCDoA, the possible mitigation measures are limited due to the limitations placed on turbine layout post EIR submission and in the light of the interests of other stakeholders.

Nevertheless every turbine position and access roads were evaluated, in consultation with the WCDoA, in terms of the possibility of reducing the impact on agricultural land by the slight adjustment of the positions of turbines and access roads, whilst making sure that the adjustments do not contradict or interfere with other limitations. The area impacted during construction is 335 025m² and includes the roads (160 400 m²), turbines with hardstands (97 125m²), substation (33 000m²) and temporary laydown area (44 500m²). After construction, the temporary laydown area will be vacated (+ 44 500) and hardstands will be covered with 15 - 30cm of topsoil, allowing farming activities to continue (+82 325m²). The total area impacted after construction will then be 208 200m² or 20,8 ha. This is a total of 0.70% of the 2 978ha of the total farmland involved.

Furthermore turbine construction will be very carefully managed. Existing access roads will be used (wherever possible) and construction hardstands will be of a temporary nature and returned to their original use after construction. Topsoil will be stripped and properly managed. Agricultural practises will be encouraged to return around the bases of the towers. Actual long term agricultural losses will therefore be minimal. Existing roads will also be returned to the pre-construction width after construction and topsoil replaced.

The financial viability of the farms involved in the scheme will be improved as a result of the income from the project, thereby improving the overall sustainability of the agricultural component of the farms.

On decommissioning of the project, all access tracks and turbine positions can be fully rehabilitated – therefore no (or very little) permanent loss of agricultural potential will result from the project.

Lastly it should be borne in mind that the Applicant has already had to reduce the number of proposed turbines from the 150 to the current 37 due to limitations placed on the project by various other stakeholders. This is also close to the minimum number of turbines required for a feasible project and the loss of further turbines will jeopardise the viability of the project. The Applicant further proposes to reduce the total number of turbines by a further 3, in consultation with the WCDoA, in order to reduce the most significant impact on agriculture.

2. WESTERN CAPE DEPARTMENT OF ENVIRONMENTAL AFFAIRS, LETTER DATED 14 JUNE 2012

Having considered the information contained in the aforementioned, the Department wishes to raise the following concerns related to the proposed Wind Energy Farm:

Western Cape Department of Environmental Affairs Comment (2.1)

The comment from Nick Helme Botanical Surveys (dated 30 September 2011) states that a number of recommended mitigation measures (outlined in his Table 1 of the same correspondence) have not been taken into account, including the removal and moving of some turbines. He specifically requests that these points be noted by DEA as outstanding issues that must be resolved prior to final approval. This Department recommends that the DEA request that the above botanical recommendations are addressed in an amended site layout for the turbines. The botanists' recommendations should be made conditional in any authorisation issued. The conditions must include the mitigation measures in section 11 of the botanical report dated November 2011 as well as the recommended mitigation in Table 1 of the botanists' correspondence dated 30 September 2011.

Response to Western Cape Department of Environmental Affairs (2.1)

All the turbines referred to in the Nick Helme Botanical Surveys report, being T3a, T5a, T17, T20 and T36, have been removed.

Western Cape Department of Environmental Affairs Comment (2.2)

The Department notes Cape Nature's comment dated 2 December 2011 wherein it is stated that impact studies on bat and bird populations should have been conducted over a year (as per EWT/Birdlife Africa's best practice guidelines). The Department is concerned about the Applicant's response that "the nature of the EIA process and engineering design process" makes it difficult to commission studies over an entire year. This Department is of the opinion that a sound decision requires sound information. If a full year study of bat and bird movement is required to produce accurate information on the impact of the proposed development then this should be done. Specialists are in a position to be able to advise on the best study periods for their assessments as soon as they are appointed. The EIA process should be informed by and structured around these requirements.

Response to Western Cape Department of Environmental Affairs(2.2)

The work done by Mr. Chris van Rooyen on the Caledon Wind project was completed prior to the Avifauna Guidelines being formulated. As you are aware, he is a joint author of these Guidelines. We acknowledge that there is some uncertainty regarding the impacts, since it has not been possible to complete the monitoring recommended in the Guidelines prior to the EIA submission. Nevertheless, in the absence of firm monitoring data, Mr van Rooyen made conservative recommendations, so as to ensure that any areas that could prove to be of particular bird sensitivity would be protected.

Mr. van Rooyen further acknowledged that despite the fact that wind power has been a feature of the energy industry in the developed world for more than a decade, best practices with regard to bird mitigation are still far from clear and universally accepted. He observed that it must be accepted that

appropriate best practices and mitigation measures with regard to impacts on birds in a South African context will take a number of years to crystallize, and a measure of trial and error will inevitably be part of the process.

Caledon Wind has appointed experts for both bird and bat monitoring, subject to being granted environmental authorisation. The Applicant expects that it will be possible to gather a minimum of a year's data prior to construction, as required by the recommended mitigation in the Guidelines. Caledon Wind (the Applicant) has committed to working with the appointed specialist avifauna consultants and Cape Nature Conservation to resolve any problems that are identified as a result of the monitoring in relation to the approved turbine positions. This includes the more drastic measures suggested by the specialist, Mr. van Rooyen, in the event that no other reasonable alternatives can be agreed upon. In a worst case, turbines will be relocated.

Western Cape Department of Environmental Affairs Comment (2.3)

The faunal impact assessment only dealt very briefly with bats and does not constitute a detailed study on their activity and presence in the area or the anticipated impacts thereon.

Response to Western Cape Department of Environmental Affairs (2.3)

Please refer to Response 2.2

Western Cape Department of Environmental Affairs Comment (2.4)

Sections 17.3.1 - 17.3.4 of the EIA report state that a number of specialist recommendations e.g. the movement of some turbines will not be adhered to. No explanation is given for this.

Response to Western Cape Department of Environmental Affairs (2.4)

17.3.1 Flora: Turbines 17 and 20 have now been removed as well, leaving no turbines in sensitive Renosterveld areas.

17.3.2 Avifauna: All the turbines in the avifauna report that are considered to be in potentially high risk areas for avifauna have been removed, being turbines T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71, and T72.

17.3.3 Heritage: All the turbines have been placed at least 400 m from identified noise receptors. Turbines T32 and T42 have been removed and T26 has been moved.

17.3.4 Noise: All the turbines have been placed to be at least 400 m from identified noise receptors. Turbines T32 and T42 have been removed due to recommendations made by the avifauna specialist and T26 has been moved to adhere to the 400 m limit from noise receptors. In the case of the proposed development the some of the most sensitive receivers will be the landowners themselves who support the development and will benefit from it.

Western Cape Department of Environmental Affairs Comment (2.5)

There is a list of issues raised by CapeNature in its comment dated 2 December 2011 that are not responded to by the Applicant. For example, it noted that the turbine layouts will not be changed in response to the ornithologists' recommendations. No explanation is given for this by the Applicant. Specialist recommendations must be considered and implemented as they are the mitigation measures essential for sound environmental decisions. They cannot be declared "not feasible, without adequate detailed motivation and sound reasoning. There are several other comments not responded to regarding fire management and challenges related to the Applicant not being the land owner. These are important issues that have not been addressed.

Response to Western Cape Department of Environmental Affairs (2.5)

While the Draft EIA does not reflect this, the Applicant has undertaken not to construct any of the **turbines that have been proposed in areas identified as high risk from a biophysical perspective** by Mr van Rooyen. These include the following turbines: T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71 and T72 (see attached map in the response to CapeNature (Appendix B).

Fire management has been addressed in the Draft Environmental Management Plan under Section 6.4.18. The recommendations are as follows:

- The Contractor shall take all reasonable and precautionary steps to ensure that fires are not started as a consequence of his activities on site.
- The Contractor shall ensure that there is basic fire-fighting equipment available on site. Fire-fighting equipment must be in working order and serviced to date.
- The Contractor shall appoint a Fire Officer who shall be responsible for ensuring immediate and appropriate actions in the event of a fire and shall ensure that employees are aware of the procedures to be followed. The Contractor shall forward the name of the Fire Officer to the ECO for his approval within 7 days of being on site.
- Flammable materials should be stored under conditions that will limit the potential for ignition and the spread of fires.
- Smoking shall not be permitted in those areas where there is a fire hazard, e.g. fuel storage areas and areas susceptible to the rapid spread of fires.
- The Contractor shall hold fire prevention talks with staff to create an awareness of the risks of fire.

Other measures in the EMP also include:

- The contractor must ensure that open fires on the site for cooking or heating are not allowed except in designated areas;
- The contractor must ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include clearing working areas and avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high risk dry, windy summer months;
- The contractor must provide adequate fire fighting equipment on-site;
- The contractor must provide fire-fighting training to selected construction staff. This must take place before construction activities commence; and
- As per the conditions of the Code of Conduct, in the advent of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate farmers for any damage caused to their farms. The contractor should also compensate the fire fighting costs borne by farmers and local authorities.

GIBB regards these measures as sufficient guarantee, for the purposes of Environmental Authorization, that fire risks will be properly managed.

In terms of the land lease agreement associated with the proposed project, the proponent, through the lease, will hold tenure over the property, and as such will have the authority to enter into a Land Stewardship Agreement with CapeNature for the duration of the lease.

Western Cape Department of Environmental Affairs Comment (2.6)

The mitigation measures put forward by the Bird Impact Assessment Specialist in Chapter 5 of the report dated November 2011 must be made conditions in any authorisation issued.

Response to Western Cape Department of Environmental Affairs (2.6)

Your comment is noted and GIBB confirms its agreement with this recommendation. The ornithologist suggested that the following turbines are situated in areas of high risk to birds: T10, T11, T19, T32, T34, T42, T44, T45, T46, T51, T63, T69, T71 and T72. GIBB has therefore suggested that these turbines be removed from the Application and the Applicant has agreed to this (see also response 2.5). The Applicant has also agreed to the monitoring proposals made by Mr van Rooyen, which will

provide a year's data prior to construction, and has committed to implementing any necessary mitigation measures that arise from this monitoring.

Western Cape Department of Environmental Affairs Comment (2.7)

The Environmental Management Programme ("EMP") must contain the mitigation measures for each turbine and must specify search and rescue procedures on the footprints of the various turbines located in the sensitive areas.

Response to Western Cape Department of Environmental Affairs (2.7)

All turbines in areas of biological sensitivity will not be constructed if the project proceeds. In our opinion the recommendations set out in the Draft EMP are appropriate for the management of the other areas. The Final EMP will be updated to include requirements to fence off areas where construction of the turbines is close to untransformed Renosterveld.

Western Cape Department of Environmental Affairs Comment (2.8)

A stewardship agreement should be signed between Cape Nature and the landowner and developer to facilitate the on-going conservation of the site.

Response to Western Cape Department of Environmental Affairs (2.8)

The Applicant agrees that this could be a valuable offset. A lease agreement has been negotiated between the land owner and Caledon Wind. In the event of authorisation of the project, this agreement will be implemented. The lease encompasses all of the land in the study area, which is approximately 2 700 ha in extent. Caledon Wind would therefore be entitled to enter into a Stewardship Agreement with Cape Nature.

As part of the Stewardship Agreement Caledon Wind has agreed to make available to CapeNature as much of the Renosterveld under its control as is required provided that environmental authorisation is granted and its bid under the Independent Power Producers process is successful. This is confirmed in the attached letter from the company's director. The ground truthing prepared for the EIA has shown that there are approximately 300 ha of untransformed Renosterveld within the lease area. The period of this commitment would be for the full term of the agreement with the Department of Energy, which in terms of the Independent Power Producer's RFP is for 20 years, extendable by agreement with the Department of Energy.

Western Cape Department of Environmental Affairs Comment (2.9)

The Department is also concerned about the "pre-construction monitoring programme" and site surveys that are proposed to identify dangers and risks etc. These are proposed to take place post-authorisation. This information should be available to the competent authority in order to inform the decision and required mitigation. It should not be retrospective.

Response to Western Cape Department of Environmental Affairs (2.9)

It is assumed that the "pre-construction monitoring programme" refers to the monitoring referred to in your Comment 2.2. We refer you to our Responses 2.2 and 2.6.

Western Cape Department of Environmental Affairs Comment (2.10)

One of the responses to Cape Nature's concern regarding wetlands states that "should during construction, a wetland or stream be found to be impacted on, construction will need to be halted and this area will be required to be delineated and construction removed from that particular area...". Impacts and risks must be identified during the EIA process so that damage can be avoided and mitigation implemented. This cannot be retrospective as it would undermine the purpose of the EIA process. The Impact that the proposed development may have on wetlands and related water bodies and their ecological functions have not yet been determined. There has been no wetland study conducted. This Department requests that a specialist wetland assessment be undertaken before any authorisation is issued. In any event, construction within 32 meters of a watercourse, which includes

wetlands, also triggers the activity (Item 11 of GN No. R544 and Item 16 of GN No. R646) and will require environmental authorisation.

Response to Western Cape Department of Environmental Affairs (2.10)

No wetlands were identified during the EIA as being affected by the proposed development and the two turbines which required a river crossing have been removed from the latest layout. In the light of the above GIBB believes that no specialist wetland study is required.

Furthermore all of the wind turbines are currently located on the top of hills where the wind blows and watercourses/ wetlands are therefore specifically avoided. The Applicant acknowledges that care needs to be taken during construction to avoid sedimentation risks as a result of access roads, trenching for cabling and clearing and excavation around the turbines, but this can be managed through careful management of the construction contractor's activities. The Draft EMP includes measures to ensure that stormwater from disturbed areas is properly managed so as to avoid sedimentation or other impacts on aquatic ecosystems (Section 6.4.14). GIBB will make the recommendation for the involvement of a specialist aquatic scientist to assist the ECO, in the event that issues arise during construction that requires specialist knowledge. These commitments will be included in the Final EMP. GIBB does not expect that there will be any significant risk of sedimentation during the operation of the turbines.

Western Cape Department of Environmental Affairs Comment (2.11)

The comments and responses report does not respond to all of the comments raised by interested and Affected Parties, despite the Issues being important. Many comments are not responded to at all, whilst other comments are responded to with "comment noted and captured accordingly" but with no actual response to the Issue raised.

Response to Western Cape Department of Environmental Affairs (2.11)

The Comments and Response Report has been reviewed and populated with detailed responses in instances where this is required. These responses will be provided to Interested and Affected Parties directly as well as to the Department of Environmental Affairs. The issues covered in this letter deal with all of the important comments made by Interested and Affected Parties, and these responses are reflected in the revised Issues and Response Report.

Please see the revised Comments and Response Report attached as Appendix C.

Western Cape Department of Environmental Affairs Comment (2.12)

No comment was obtained from Heritage Western Cape, the Department of Agriculture or the local and district authorities.

Response to Western Cape Department of Environmental Affairs (2.12)

Heritage Western Cape is included in the Stakeholder Database and as such was consulted as part of the Public Consultation process for the EIA. The comments from Heritage Western Cape are addressed later in this letter.

Please find comment from the WCDoA and local municipalities attached as Appendix C. Comment on the issues raised by the Department is included under our responses in 1.1 above.

Western Cape Department of Environmental Affairs Comment (2.13)

The proposed development will require access roads, staff housing (four new facilities), power lines etc. These structures and infrastructure were stated to have been assessed in the specialist studies but this does not appear to be the case. There are no layout plans in the report for the proposed location of the staff housing, control room etc. No detail is provided on the footprint size of these structures/infrastructure nor are alternatives considered for these structures/infrastructure (except for basic figures illustrating power lines and roads on page 4-7 and 4-9). No written descriptions of alternatives for these are provided.

Response to Western Cape Department of Environmental Affairs (2.13)

Staff housing will no longer be located on site. The Applicant has confirmed that the control room is and has always been off site. The substation will still be on site as is described in the Final Environmental Impact Assessment Report.

Furthermore, the alternatives as presented in Chapter 4 were initially evaluated in the specialist reports i.e. the do nothing alternative, layout and design alternatives, size of the wind turbines, transmission power lines and access roads and cable trenches.

Due to the sheer number of restrictions emanating from the specialist reports, the number of alternatives that needed to be evaluated also increased significantly on a turbine for turbine basis. For example, no turbines in high risk avifauna areas, no turbines in any indigenous Renosterveld, minimise disturbance of existing agriculture, cables to follow roads so as not to disturb additional land, no digging of cable trenches in Renosterveld, no turbines within 400 m of any noise - sensitive receptors and turbines to be placed at least 1, 5 times tip height from any borders or structures. Due to the number of alternatives that needed to be evaluated for each turbine, it was decided to use the specialist inputs to find the optimal layout and not to try to describe all the alternatives that played a role in every turbine placement.

Due to all these restrictions, the project size has had to be reduced from an initial 150 turbines to the current 37, placed in positions acceptable according to the various specialist reports.

Western Cape Department of Environmental Affairs Comment (2.14)

The Department notes the information previously requested by DEA (as summarised on page 6-9 of the EIA report). In this Department's opinion, several of the requests have not been satisfied in the report.

Copies of all original comments were not included in the EIA report e.g. this Department's comments on the Draft report (dated 8 December 2011) were not included. The Department notes the responses to this Department's comments in the comments and responses report (page 29). In this Department's opinion, the responses to the following concerns were not adequate:

- i. The consideration of alternatives with regard to the layout of wind turbines and internal road access routes, which are also inadequately addressed in the final EIAR.
- ii. The Department requested that alternatives that avoid sensitive areas must be identified and reported on in the final EIAR. A limited number of wind turbines have either been moved or removed. No substantial explanation has been given for other wind turbine alternatives not being considered, which are still proposed to be situated in sensitive areas (see for example, the botanists comment dated 30 September 2011).
- iii. No comment has been sought from this Department's Directorate: Pollution Management, with specific reference to the noise regulations and the impacts of noise pollution as a result of the proposed development (contact person: J. Leaner - 021 483 2798). Please refer to the Issues and Response Report on page 31 of the Final EIAR.
- iv. The storm water management plan contained in the EMP is inadequate as it does not fully indicate how sediment and erosion from runoff will be reduced and prevented.
- v. The Applicant did not respond to this Department's request for a road maintenance plan. There is no road maintenance plan contained in the EMP and where reference is made to the rehabilitation of the access roads after construction has been completed, no details are provided for how this will be done.
- vi. The applicable 2010 EIA listed activities should also be identified and included. The impacts of these activities have to be assessed and reported on.
- vii. In summary, this Department is of the opinion that insufficient information is available to authorise this proposed development. There are a number of shortcomings in the

report that need to be addressed. The Department recommends that the above be addressed before authorisation can be considered.

Response to Western Cape Department of Environmental Affairs (2.14)

Please provide GIBB with a copy of the Department's comments on the Draft report (dated 8 December 2011).

- i. Please refer to Response 2.5 and 2.6;
- ii. Please refer to Response 2.5 and 2.6;
- iii. It is the Western Cape Department of Environmental Affairs' responsibility to solicit comment from internal Directorates. A Noise Impact Assessment was however conducted and the recommendation from the specialist has been included in the Draft EMP in section 6.4.16;
- iv. Stormwater management requirements are included in Section 6.4.14 of the Draft EMP. The construction contractor is required to prepare a method statement concerning stormwater management that is to be reviewed by the ECO and Project Manager before implementation. Proposed stormwater controls during construction will be carefully checked by the ECO in order to ensure that they are adequate. Provision is made in the EMP to monitor drainage works to ensure that they are adequate, both during and after construction.
- v. A Road Maintenance Plan will be submitted to the Department upon receipt of Environmental Authorisation;
- vi. In our view the transitional provisions of the 2010 EIA Regulations provide for the consideration of this application under the 2006 EIA regulations. Further, not one activity listed under the 2010 EIA Regulations and not under the 2006 EIA Regulations is triggered.

3. HERITAGE WESTERN CAPE LETTER DATED 15 FEBRUARY 2012

Heritage Western Cape Comment (3.1)

Your NID dated 1 February 2012 was tabled and the following was discussed;

1. This application is for the first 2 phases of the Wind Energy Facility comprising of 70 turbines on 3500ha between Botrivier and Caledon
2. The associated infrastructure includes internal access roads, transmission lines, underground and overhead cables, a substation and a control centre compound in an existing building
3. Structures on site will be visually impacted
4. The development is situated within an agricultural cultural landscape
5. Archaeological resources have been identified
6. Both marked, the old farm family graveyard, and unmarked graves may be present on site
7. An HIA was submitted at the NID phase, however, no colour version of the report was provided
8. The HIA is insufficient as visual concerns have not been addressed and none of the heritage resources have been graded
9. Turbines fall within 500m of the structures and graves
10. The proposed Wind Farm is positioned on the R43 and will be visible from the Houw Hoek Pass, N2, Caledon, Riviersterend Valley and the Botrivier Valley, also the towns of Genadendal and Greyton
11. 19 turbines will be within 350m of the R43

Decision;

An integrated HIA is required that consists of an adequate record of the archaeological material including GPS co-ordinates associated with a photographic record, an assessment and grading of the identified structures including an assessment of the impact that the proposed development will have on the significance of these structures by a suitably qualified professional, an assessment of the visual impact of the development on the identified heritage resources including scenic routes and historical towns by a suitably qualified professional. An integrated set of recommendations is required. The full original studies must be appended in full.

Response to Heritage Western Cape (3.1)

The Heritage resources that will be affected by the proposed development are known and the impact of the turbines on them has been investigated and described in the Heritage Impact Assessment which forms part of the EIA. Turbine positions are further than 500 m from any Heritage Resources and it is therefore GIBB's opinion that no further studies are required.

The impacts on the 'cultural landscape' are visual and have been assessed in the Visual Impact Assessment. Please refer to the details of this study, included in Appendix P of the Final EIA, and to Chapter 15 of the EIA itself. The EIA found that the visual impact of the project will be highly significant, and that micro-positioning of the turbines will not assist in reducing this impact.

Nevertheless, the EIA points out that:

- It appears that no tourist facilities (except for the views from the top of Swartberg in the Caledon Nature Reserve,) will be directly visually affected, such facilities as the Caledon Spa and Casino being shielded from views of the wind farm; and
- The visual impacts are entirely reversible should the wind farm be decommissioned after the initial 20 year lifespan of the turbines.

The information in terms of Heritage Resources is therefore available to the Competent Authority for decision making purposes in the Final EIR as well as the Heritage Impact Assessment

We hope you find the above in order.

Yours faithfully



Project Scientist



Project Director



GIBB General Manager

APPENDIX A - COMMENTS PROVIDED TO MR WILMANS ON 25 JULY 2012 FROM CAPE NATURE, THE WESTERN CAPE DEPARTMENT OF AGRICULTURE AS WELL AS THE WESTERN CAPE DEPARTMENT OF ENVIRONMENTAL AFFAIRS

APPENDIX B – RESPONSE TO CAPE NATURE

APPENDIX C – REVISION OF RELEVANT SECTIONS OF THE COMMENTS AND RESPONSE REPORT