

## WIND GARDEN WIND FARM, EASTERN CAPE PROVINCE

### COMMENTS AND RESPONSES REPORT

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The Wind Garden Wind Farm Basic Assessment (BA) Process was announced together with the Development of a Cluster of Renewable Energy Facilities located between Somerset East and Makhanda, Eastern Cape Province on Tuesday, 17 November 2020. The Background Information Document was distributed together with a notification letter which served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have on any of the proposed developments or all. All written comments received during the BA process to date have been included in the table below and included in **Appendix C7** of the Basic Assessment (BA) Report.

The Basic Assessment (BA) Report is available for a 30-day review and comment period from **Thursday, 04 March 2021** until **Wednesday, 07 April 2021**. The Comments and Responses Report (C&RR) will be updated with comments received during the review and comment period and included in **Appendix C7** of the final Basic Assessment Report.

#### LIST OF ABBREVIATIONS / ACRONYMS

BA	Basic Assessment	BAR	Basic Assessment Report
BID	Background Information Document	CIPC	Companies and Intellectual Property Commission
EAP	Environmental Assessment Practitioner	PE	Protected Environment
WEF	Wind Energy Facility		

## 1. COMMENTS RECEIVED DURING THE COMMENCEMENT OF THE BASIC ASSESSMENT PROCESS

### 1.1. Organs of State

No.	Comment	Raised by	Response
1.	<p>Please find attached Eskom general requirements for works at or near Eskom infrastructure and servitudes. Please also find attached the Eskom setbacks guideline the applicant needs to consider during planning of the layouts and positioning of infrastructure.</p> <p><b>Renewable Energy Generation Plant Setbacks to Eskom Infrastructure document was submitted and is included in Appendix C7 of the BAR. The requirements listed below forms part of the set of documents attached to the e-mail.</b></p> <ol style="list-style-type: none"> <li>1. Eskom's rights and services must be acknowledged and respected at all times.</li> <li>2. Eskom shall at all times retain unobstructed access to and egress from its servitudes.</li> <li>3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.</li> <li>4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.</li> <li>5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.</li> <li>6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous</li> </ol>	<p>John Geeringh Senior Consultant Environmental Management Land and Rights Eskom Transmission Division</p> <p>E-mail: 19 October 2020</p>	<p>The requirements for development at or near Eskom infrastructure servitudes are noted. These requirements have been submitted to the developer for their attention and consideration for the development of the Wind Garden Wind Farm.</p>

No.	Comment	Raised by	Response
	<p>written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.</p> <p>7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.</p> <p>8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.</p> <p>9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager.</p>		

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	<p><u>Note:</u> Where and electrical outage is required, at least fourteen work days are required to arrange it.</p> <p>10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.</p> <p>11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.</p> <p>12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993).</p> <p>13. Equipment shall be regarded electrically live and therefore dangerous at all times.</p> <p>14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.</p> <p>15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.</p> <p>16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.</p>		

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	<p>17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.</p>		
2.	<p>SANRAL has the following comments, with regards to the proposed above mentioned subject development, within the Blue Crane Local Municipality (R63/N10) and Makana Local Municipality (N2/R67):</p> <ul style="list-style-type: none"> <li>• No installation of any infrastructure inside the Road Reserve.</li> <li>• The wind turbines must be erected at least 200 metres from the National Road Reserve boundary, if this requirement cannot be met, then a good motivation has to be submitted to SANRAL as to why the wind turbines should be erected closer.</li> <li>• All other buildings / structures should be erected at least 60 metres from the National Road Reserve boundary and / or 500 metres from any intersection.</li> <li>• If access is required from the National Road, an approval from SANRAL is required, otherwise access can be obtained from the nearest numbered route.</li> <li>• A formal application together with the plans of the proposed wind farm must be submitted to SANRAL.</li> <li>• Construction of all work may only commence after written approval has been obtained from SANRAL.</li> </ul>	<p>Chumisa Njingana Engineer SANRAL</p> <p>E-mail: 22 November 2020</p>	<p>It can be confirmed that there will be no infrastructure within the National Road Reserve as the development of the Wind Garden Wind Farm is not planned to take place near any national roads.</p> <p>It can be confirmed that there will be no infrastructure (including wind turbines) within 200m from a National Road as the development of the Wind Garden Wind Farm is not planned to take place near any national roads.</p> <p>It can be confirmed that there will be no infrastructure (including buildings) within 60m from a National Road or within 500m of an intersection which includes a national road as the development of the Wind Garden Wind Farm is not planned to take place near any national roads.</p> <p>It can be confirmed that there will be no intersections required over national roads as the development of the Wind Garden Wind Farm is not planned to take place near any national roads.</p> <p>The required applications will be submitted to SANRAL if applicable.</p> <p>The required approvals will be obtained from SANRAL if applicable.</p>

No.	Comment	Raised by	Response
3.	Can you please send a kml/kmz file of the localities for this proposed project?	Shanè Gertze Environmental Planner Eastern Cape Parks & Tourism Agency  E-mail: 03 December 2021	The requested KMZ file was submitted to the stakeholder via email on 05 January 2021.

## 1.2. Key Stakeholders and Interested & Affected Parties

No.	Comment	Raised by	Response
1.	I suggest that your half page advert in The Herald today is possibly not legal. The headline refers to an area between Somerset East and a town that I believe no longer exists. Perhaps you should consult your lawyers on the matter to ascertain the correctness of the issue.	Unknown recipient  E-mail: 12 November 2020	The I&AP was contacted to obtain his name and contact details. He informed the project team that there is no need to register him on the project's database (refer to <b>Appendix C7</b> of the BAR). The use of the name Grahamstown has been rectified in the project documentation, which now refers to Makhanda.
2.	I was just looking at your cluster of renewable energy projects project and was wondering if all the wind farms are being developed by 1 developer or multiple developers?	Jessica Els I&AP  E-mail: 12 November 2020	The various renewable energy facilities that form part of the cluster are proposed by the same umbrella company but are assessed under separate special purpose vehicles as per the list of applicants provided via e-mail to the I&AP on 12 November 2020 (refer to <b>Appendix C6</b> of the BAR). The Applicant for the Wind Garden Wind Farm is Wind Garden (Pty) Ltd.
3.	Major affect on tourism based game reserves. Has direct impact on grading of our lodges, but more importantly, the noise & danger impact on our flora & fauna.	Neale Howarth Chairman Indalo Protected Environment  Comment Form: 18 November 2020	The concerns raised by the I&AP regarding the impacts on the game reserves and the associated tourism, noise impacts and threats and disturbance to flora and fauna have been noted as part of the EIA process.  Independent specialist studies have been undertaken as part of the BA process to assess these issues raised by the I&AP. The Socio-Economic Impact Assessment ( <b>Appendix L</b> ) assessed the impact of the Wind Garden Wind Farm on the local tourism

No.	Comment	Raised by	Response
			<p>and game farming industry which has indicated that the impact will be of a low significance during construction and operation, with the implementation of the recommended mitigation measures.</p> <p>The Ecological Impact Assessment (<b>Appendix D</b>) has assessed the impact of the development on flora and fauna. The results indicate that there will be a medium impact on vegetation and protected plant species and a low impact on fauna during the construction phase with the implementation of the recommended mitigation measures. During the operation phase there will be a low impact on fauna, with the implementation of the mitigation measures. No impacts to flora have been identified by the specialist for the operation phase, except for alien invasion for which appropriate mitigation measures have been identified.</p> <p>The Avifauna Impact Assessment (<b>Appendix E</b>) has assessed impacts on avifauna species present within the project site. The Avifauna Impact Assessment identified that all impacts associated with the development of the Wind Garden Wind Farm development footprint will be of a medium significance before mitigation and can be mitigated to an acceptable level of impact (i.e. medium or low significance, depending on the impact being considered). No impacts of a high significance or fatal flaws are expected to occur with the implementation of the recommended mitigation measures.</p> <p>The Bat Impact Assessment (<b>Appendix F</b>) has assessed impacts on bats. Five of the bat species (and potentially more unidentified species) that were recorded on site exhibit behaviour that may bring them into contact with wind turbine</p>

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			<p>blades. Based on the bat activity recorded at the Wind Garden Wind Farm, the significance ratings for the majority of the impacts to bats posed by the development are predicted to be medium or high before mitigation. After mitigation, all impacts are predicted to be low. Based on the opportunity for reduction of the impacts through appropriate mitigation measures from a high or medium significance to a low acceptable significance no fatal flaws are expected to occur.</p>
4.	<p>As an Eastern Cape resident I have a keen interest in the development of the province and these projects could bring much needed development and jobs to the region.</p>	<p>Stevon Hobson Engineering Advice &amp; Services (Pty) Ltd  E-mail: 18 November 2020</p>	<p>The place of residence and interest of the I&amp;AP in the project is noted. It is confirmed that the I&amp;AP has been registered on the project database (<b>Appendix C2</b>).</p> <p>A Socio-Economic Impact Assessment (<b>Appendix L</b>) was undertaken for the project which considers the positive impacts associated with the development, including employment opportunities and economic development.</p>
5.	<p>My company is a specialist piping fabricator and constructor and we, as a team, would like to engage in more renewable energy projects as opportunities present themselves. Our interests lie in wind, Solar and gas to power projects.</p>	<p>Grahame Britchford Project Manager: Arminco Piping Projects  E-mail: 18 November 2020</p>	<p>The interest of the I&amp;AP is noted. It is confirmed that the I&amp;AP has been registered on the project database (<b>Appendix C2</b>). The details of the I&amp;AP have been provided to the developer for their records.</p>
6.	<p>We require the BA before final comments.</p>	<p>Angus Sholto-Douglas Managing Director C-SA Properties (Pty) Ltd  Comment Form: 18 November 2020</p>	<p>The Basic Assessment (BA) process formally commenced on 17 November 2020 and the I&amp;AP has been registered on the project database.</p> <p>The I&amp;AP was notified of the availability of the BAR via email on 03 March 2021, which included the details of where the report can be accessed.</p> <p>All comments raised by the I&amp;AP on the Wind Garden Wind Farm BAR will be recorded, included and addressed within the final BAR to be submitted to the DEFF for decision-making.</p>



No.	Comment	Raised by	Response
	The map of Kwandwe Protected Environment is incorrect.		The information for the area was sourced from the most recent DEFF South Africa Protected and Conservation Areas.
	The impact of a WEF on a border of a border of a PE and in the Biodiversity expansion corridor is of grave concern and questionable intent.		It is confirmed within the Ecological Impact Assessment ( <b>Appendix D</b> ) that the development does not fall within a National Protected Areas Expansion Strategy (NPAES) Focus Area. The Wind Garden Wind Farm is not located directly adjacent to a protected area.
	We reserve all our right to strongly oppose this poorly conceived plan which has failed twice before!!		The opposition raised by the I&AP to the development of the Wind Garden Wind Farm is noted.
	When can we expect to receive the Basic Assessment so we can comment on the detail of the proposed development?	E-mail: 19 November 2020	All registered I&APs have been notified of the availability of the BAR for their review and comment (refer to <b>Appendix C6</b> of the BAR). The availability of the report has also been advertised in the Herald (a provincial newspaper) and Hartland Nuus (a local community newspaper) (refer to <b>Appendix C3</b> of the BAR).
7.	<p>Kwandwe Private Game Reserve lies in the Great Fish River Valley, east of the R67 between Grahamstown and Fort Beaufort. Presently Kwandwe permanently employs 260 people, most of who originate from the immediate area. Kwandwe has made significant investment in the local economy, including, but not limited to the Fort Brown Primary School, the Mgcamabele Community Centre and the establishment of the Ubunye Foundation.</p> <p>Kwandwe and its subsidiaries inject an average R3,8million per month directly into the Makhanda economy through salaries and support of local business.</p> <p>Kwandwe has numerous neighbours who will also be adversely affected by the proposed Wind Garden and Fronteer Wind Farms, namely Clifton Wildlife Estate, Hay Lodge, Lukhanyo</p>	<p>Hendrik Odendaal General Manager C-SA Properties (Pty) Ltd Kwandwe Private Game Reserve</p> <p>Letter: 23 November 2020</p>	<p>The position of the I&amp;AP and the contributions of the Kwandwe Private Game Reserve to the community are noted.</p> <p>The main concern raised by the Reserve is the potential impact of the wind farm development on their tourism and game farming activities. These concerns are individually addressed in the responses which follow.</p>

No.	Comment	Raised by	Response
	<p>Game Reserve, Vaalkrans Game Reserve, Lanka Safaris, Hellsport Game Reserve, Woodlands Safari Estate and Ezulu.</p> <p>Kwandwe prides itself on a conservation record that has spanned twenty years, conserving a wide variety of endangered species. Renewable energy is of critical importance to our planet and we as a group support this. We do, however, believe that Wind Energy Facilities need to be placed responsibly where minimal impact on the avifauna and wildlife based tourism ventures occurs.</p> <p>We firmly believe that the position of these WEF's, will have significant impact on the tourism ventures of our greater area, especially Kwandwe Private Game Reserve.</p>		
	<p>1. THE VISUAL IMPACT OF THE PROPOSED FRONTIER AND WIND GARDEN WEF'S</p> <p>The clientele of Kwandwe is made up of mainly international guests, bringing much needed foreign currency into our economy. These guests are looking for experiences in wildlife areas that have as little exposure to visual and sound pollution. The proposed 130m high masts on the ridges on our south-western boundary will consequently detract from the sense of place and wildness of the experience we offer to our guests and have gained a reputation for over the past twenty years. The Socio-Economic value of private game reserves in the Eastern Cape is well researched and studied by:</p> <p>2.1. Nelson Mandela University, Centre for African Conservation Ecology Report No. 60, August 2011 titled "Combining conservation and socio-economic development: An assessment of eco-tourism-based</p>		<p>A Visual Impact Assessment (<b>Appendix K</b> of the BAR) has been undertaken as part of the BA process. It was concluded that the Wind Garden Wind Farm could have a high visual impact on objecting landowners and residents of (or visitors to) homesteads and tourist facilities within a 10 - 20km radius of the wind turbine structures. This includes residents of/visitors to Shenfield (Lanka Safaris), Peninsula and Fonteinskloof, Douglas Heights, Cranford, Heatherton Towers, Melton, Beaumont and Vetteweiden (all located within Kwandwe Nature Reserve). No mitigation of this impact is possible (i.e. the structures will be visible regardless), but general mitigation and management measures are recommended as best practice. Even though the above impact rating could be high, and in spite of the fact that no mitigation of this impact is possible (i.e. the structures will be visible regardless), the rating should be viewed in the context of the following potential moderating factors:</p>

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	<p>private game reserves in the Eastern Cape by Andrew Muir; Andrew Skowno and Graham Kerley.</p> <p>2.2. Centre of African Conservation Ecology Report No 56. "COMBINING CONSERVATION AND DEVELOPMENT ON PRIVATE LANDS: AN ASSESSMENT OF ECOTOURISM BASED PRIVATE GAME RESERVES IN THE EASTERN CAPE" by Jeffrey A. Langholz and Graham Kerley.</p> <p>2.3. J. D. Snowball and G. G. Antrobus: (2008) Ecotourism and Socio-economic development: The impact of the conservation, economic and social activities of private game reserves in the Eastern Cape. Rhodes University, Department of Economics and Economic History.</p> <p>Renato Johnsson's paper "The Benefits of Wildlife Tourism in the Eastern Cape." (unpublished) refers. Johnsson's paper comments on the Socio-economic studies conducted above.</p> <p>2.4. A 2019 Socio-Economic Research paper will be published by Rhodes University later in the year, giving an updated perspective on the socio-economic value of Private Game Reserves in the Eastern Cape.</p>		<ul style="list-style-type: none"> <li>» In most instances the wind turbines will only be partially exposed.</li> <li>» Fewer turbines is expected to be exposed to the north due to the shielding effect of the escarpment.</li> <li>» The generally longer distances of observation (i.e. beyond 10km) is expected to mitigate the impact to some degree.</li> </ul> <p>Additional to this, and according to the Socio-Economic Impact Assessment (<b>Appendix L</b>), objections are more likely to be received during the pre-construction stage of the Wind Garden Wind Farm, with more tolerance shown during operation. This is attributed to the fact that initially perceived negative impacts associated with wind energy facilities do not always come to fruition.</p>
	<p>2. NEGATIVE IMPACT ON ECO-TOURISM</p> <p>Private Game Reserves are an important magnet that attracts tourists to the region, notably foreign tourists. For a large proportion of the estimated 1.5 million foreign tourists who visit South Africa every year, <b>scenery and wildlife</b> is the primary attraction, with 45% of them visiting at least one wildlife or nature reserve during their trip (Hall, 2007 cited in Indalo 2008.)</p> <p>Ecotourism, as opposed to agriculture is an activity more likely to achieve economic and ecological sustainability in the long</p>		<p>The Socio-Economic Impact Assessment (<b>Appendix L</b>) has assessed the impact of the development on the local tourism and game farming industry during both the construction and operation phases due to the associated noise and visual impacts of a wind farm. It was concluded that during the construction phase, The presence of construction machinery, increased traffic to and from the site (transporting staff, equipment, and material) and staff on or near the site will likely be the largest disturbances. The longer construction continues, the greater the disturbances will likely be. As the towers of the wind turbines are erected there is likely to be an increased</p>

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	<p>run, with greater benefits for the local communities in terms of employment, empowerment and general upliftment.</p> <p>The original TERU report of 2004 found that ecotourism-based game farming has long been described as a sustainable alternative to livestock farming, especially in semi-arid areas — such as in the Eastern Cape - where low rainfall precludes cropping and livestock production is marginal. The study finds that:</p> <p>"As a land- use, eco-tourism-based game farming is an economically and ecologically desirable alternative to other land uses, including mohair and dairy farming. Not only does it generate more income per unit area, but it also creates more jobs that are better paid" (2004: 20) "Private Game Reserves seek to blend earnings with ecology and business with biodiversity" (2006: 4)</p> <p>This report provides the main findings of the studies; the employment effects of the conversion from farming to ecotourism resulted in more and better jobs being created, and which has featured the upskilling of local workers in order for the local communities to be able to become involved in the ecotourism ventures. The studies also revealed the contribution of ecotourism to the wider economy, including attracting tourists to stay in the region longer. The move towards eco-tourism has further increased the conservation estate in the Province and provides for the conservation of the rural wildlife for the enjoyment of future generations.</p> <p>3. IMPACT ON COMMUNITY OUTREACHPROGRAMMES AND EMPLOYMENT</p>		<p>disturbance as towers and turbines become increasing visible in the surrounding area. During this period, the full negative impact may be experienced by local tourism. Once construction is completed the disturbances associated with the vehicular traffic, equipment and staff will be reduced and the remaining disturbance will be that of the wind farm itself. The impact can be mitigated to a low significance. The examination of the wind farm impacts on tourism from literature have indicated that no lasting impacts to tourism are likely to occur. According to the literature review it was revealed that during pre-planning and planning, the negative impacts would be noticed the most, however, once operational, the impacts experienced during pre-planning and planning will most likely dissipate.</p> <p>The full extent of the negative impact will, however, most probably be achieved during the operation phase of the project when the word about the proximity of the project to local game farms spread amongst potential tourists and repeat visitors and when the turbines are fully operational and visible. The negative effects of wind farms on tourists' interest to visit the area have not been confirmed. However, based on the initial analysis of surrounding product owners, the effect of the existing Waainek Wind Farm did not impact the number of tourists visiting the area after its construction. The primary concern amongst residents was that of an ailing economy, crime and poor infrastructure.</p> <p>While it is noted that there is low probability of any negative impacts occurring, there is a possibility that the development of the wind farm may decrease the number of visitors to the region. The impact was identified to be of a medium</p>

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	<p>Another important feature of the private game reserves of the INDALO association, which was highlighted in the study conducted by Rhodes University, was the extent to which PGRs have developed linkages with the communities in their area, "not because of any legal requirement, but rather from a sense of corporate responsibility."</p> <p>"A lesser known feature of Indalo PGRs is the extent of their engagement in community outreach programmes. All the reserves in the study reported some involvement in current community development projects. The engagement includes involvement with local institutions such as schools, taking less privileged children on game drives, in environmental and conservation awareness programmes, AIDs education, facilitating volunteer programmes at an AIDs orphanage, training of family members in small business activities and providing outlets for the sale of products such as vegetables and curios, and sponsoring recreational facilities and activities".</p> <p>From the onset the INDALO Private Game Reserves have demonstrated a commitment to job creation and community development through the retraining and conversion of their local workers to make the change from agriculture to the tourism industry. This includes employing local staff despite a lack of skills and, in many cases, illiteracy and providing them with skills training.</p> <p>For most of the INDALO PGRs strict human resource and procurement policies are in place to employ previous farm workers and to recruit staff from the local community, with a long-term objective to implement skills development and</p>		<p>significance which can be reduced to a low acceptable level with the implementation of the recommended mitigation measures.</p> <p>Considering the above, the Wind Garden Wind Farm is not expected to impact on the community outreach programmes and employment being provided by the Kwandwe Private Game Reserve. The development of the Wind Garden Wind Farm will also contribute to the surrounding communities and local residents through socio-economic development and employment opportunities, rather than detracting from the current contributions made by the Kwandwe Private Game Reserve.</p> <p>The proposal provided by the I&amp;AP for a 10km buffer around protected areas is noted. It must however be considered that the impacts from a socio-economic perspective were assessed to be of a low significance with the implementation of mitigation. Visual impacts were identified to be of a high significance due to the nature of the development, however this is not considered to be a fatal flaw by the specialist <b>(Appendix K)</b>.</p>

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	<p>employment equity plans. Due to a lack of hospitality-related skills, substantial in-house training is required. Training may take as long as 18 months to 5 years. Skills required on the PGRs include an ability to speak English, numeracy, literacy, hospitality skills, game ranging, security, anti-poaching, chef skills and public relations.</p> <p>While the reliance on local rural population to provide an upscale tourism service presents a daunting challenge, the 2006 report considers that INDALO PGRs "are finding creative ways to meet tourists' high expectations for superb service while also honoring their commitment to local communities."</p> <p>4. IMPACT ON WIDER ECONOMY AND SOCIAL STRUCTURE</p> <p>Ecotourism's Contribution to the Wider Economy:</p> <p>There is an urgent need for national and provincial government to acknowledge the important contribution this industry is making towards the country's economy. The studies have shown that 3 500 people are dependent on income gained working in Private Game Reserves (PGR's). In terms of multiplier effects the revenue generated by these eco-tourism businesses translates into an infusion of R180 million into the regional economy.</p> <p>Multiplier effects occur in the economy because guests to PGRs purchase further items during their time in the Eastern Cape. These includes buying crafts and souvenirs, staying in hotels, renting cars, buying petrol, purchasing clothes, visiting other attractions, and dining in restaurants. Therefore the tourists' true</p>		

No.	Comment	Raised by	Response
	<p>economic impact in the region is much wider than what is spent at the PGRs.</p> <p>The INDALO studies sought to determine the general contribution to the economy by the visitors attracted to the region by the private game reserves. The 2004 study estimated that a 70% multiplier effect applied to gross incomes of R87.2 million generated by 12 existing PGRs in 2002/2003 would imply that visitors made direct and indirect expenditures close to R150 million (2004: 16). The 2006 study, using the same equation, found that R105.8 million in revenue generated by PGRs in 2004/2005 translates into a total infusion of R180 million into the regional economy (2006: 12). The spending of overseas guests also generates important foreign exchange earnings for the South Africa treasury.</p> <p>In addition to economic multiplier effects there are also social multiplier effects, the study by the University of Port Elizabeth remarked:</p> <p>"Eco-tourism lends itself very well to developing and building partnerships with communities. An array of potential initiatives exists, with regard to previously disadvantaged communities and informal settlements within and around the PGRs. Potential initiatives include promoting development in townships / settlements through arts and crafts; introducing local children to environmental education; conservation outreach programs within the communities themselves and linkages with teachers in local schools."</p> <p>5. KWANDWE PRIVATE GAME RESERVE</p>		

No.	Comment	Raised by	Response
	<p>Kwandwe's website introduction is as follows:</p> <p>"Nestled in the heart of South Africa's unspoilt Eastern Cape province lies Kwandwe Private Game Reserve, a world-class Big Five safari destination. The 22,000 hectares of pristine private wilderness stretches either side of the Great Fish River which meanders for 30 kilometres through scenic landscape and comprises just twenty-six rooms split across five very individual and distinct safari lodges and villas, according it one of the highest land to guest ratios in South Africa. Renowned for quality guiding, understated luxury and the thousands of animals and wildlife that call the Reserve home, Kwandwe offers a range of safari activities and accommodation options to make every African Dream come true". <a href="http://www.kwandwe.com">www.kwandwe.com</a>.</p> <p>Kwandwe is committed to making a positive and lasting difference in the rural Eastern Cape, one of South Africa's least developed provinces. Working through its social development partner, the Ubunye Foundation, Kwandwe invests in projects that improve lives and create sustainable livelihoods opportunities in marginalised rural communities. <a href="http://www.ubunvefoundation.co.za">www.ubunvefoundation.co.za</a> <a href="https://youtu.be/D_-HvZulvFU">https://youtu.be/D_-HvZulvFU</a></p> <p>Kwandwe has been trading for 18 years and has an established track record of conservation and community development. These efforts have led to Kwandwe being declared a <b>Protected Environment</b>. There is a projected further 6,500 hectares that will be added into the Kwandwe Protected Environment, this will be done on the basis that we are secure in the knowledge that the sense of place and "wildness" of the Great Fish River Valley is not compromised by visual pollution.</p>		



No.	Comment	Raised by	Response
	<p>It is our proposal that Protected Environments should receive protection from the visual pollution of WEF and <b>an exclusion zone of at least ten kilometers around all Protected Environments</b> should be observed. This said, should a proposed WEF still pose a significant visual threat to the business activity, this exclusion zone should be considered on the merits of each application.</p> <p>Every guest staying at Kwandwe makes a direct contribution to community development through the Conservation and Community Levy (funds raised from this levy are split equally between these two initiatives).</p> <p>Kwandwe Private Game Reserve firmly believes that WEF's in the two areas proposed above, pose a significant threat to their eco-tourism business. The visual impact of turbines is well-documented, and it is believed that such visual impact will result in reduced numbers of tourists visiting the private game reserve, which will in turn result in a reduction of employment.</p> <p>The Wildlife Economy Lab run by the National Department of Environmental Affairs and the Department of Tourism plotted out an ambitious and attainable plan, which has been endorsed by all stake holders. There is a green economy that underpins the rural economy, it is clearly evident in the Great Fish River Valley with consumptive use, non-consumptive eco-tourism as well as Provincial Nature Reserves. It is clear that a sustainable and long-standing wildlife economy has been developed.</p>		
6.	In conclusion		The comment has been noted and responses to specific issues provided above.

No.	Comment	Raised by	Response
	<p>President Cyril Ramaphosa stated that the tourism sector "... is a sector that is thriving and that has tremendous potential for further growth and for the creation of jobs. There is growing global consensus on the need for countries to pursue paths of sustainable development, to grow and transform our respective economies while minimising our impact on nature.</p> <p>Tourism has an extensive value chain, stimulating economic activity in manufacturing, in the services sector and in the creative and cultural industries. We have set ourselves a bold target to raise over \$100 billion in new investment over five years. Tourism plays a critical role in that strategy." 4 May 2019, South African Tourism Indaba, Durban.</p> <p>I firmly believe that the proposed WEF's pose a significant threat to our eco-tourism business, and in turn on the valuable socio-economic role of Private Game Reserves and Protected Areas.</p>		
8.	<p>Could you please provide details about who the applicant is?</p>	<p>Shaun Taylor Enel Green Power</p> <p>E-mail: 26 November 2020</p>	<p>The information requested, together with the BID, was e-mailed to the I&amp;AP on 26 November 2020 (refer to <b>Appendix C7</b> of the BAR).</p>
9.	<p>I hope you are well? I presume that BirdLife South Africa is a I&amp;AP for these projects and that our Cape Vulture Guidelines are being applied, but just double-checking?</p>	<p>Samantha Ralston-Paton Birds and Renewable Energy Project Manager BirdLife South Africa</p> <p>E-mail: 30 November 2020</p>	<p>BirdLife SA is a registered stakeholder I&amp;AP on the project's database.</p> <p>An Avifauna Impact Assessment is included as <b>Appendix E</b> of the BAR.</p>
10.	<p>We have received information (two documents) from a farmer about the envisaged projects.</p>	<p>HO De Waal Director: Spiny Cactus Processing (Pty) Ltd</p> <p>Letter: 02 December 2020</p>	<p>The content of the letter dated 02 December 2020 was acknowledged on 02 December 2020 and was submitted to the applicant for record purposes (refer to <b>Appendix C7</b> of the BAR).</p>

No.	Comment	Raised by	Response
	<p>Alien invader cacti, predominantly the spiny <i>Opuntia ficus-indica</i> and <i>O. engelmannii</i> have infested to various degrees the Eastern Cape Province.</p> <p>Our Company, Spiny Cactus Pear Processing (Pty) Ltd has been involved in preparing the construction sites for the erection of a wind turbine project near Bedford. We were specifically engaged to clear the invader alien spiny cacti from the access roads and platforms stands for the contractors to erect the wind turbine towers and auxiliary facilities.</p> <p>Considerable competency and expertise have been developed in harvesting and processing alien spiny invader plants as livestock feed.</p> <p>Attached please find a document providing some background in this regard. We assume our expertise will be required to implement the envisaged projects. Please advise how and with whom we can engage to participate</p>		
11.	<p>Ek het met Andries Troskie gesels en hy het genoem dat julle besig is met werk aan die groep windplase Wes van Middleton.</p> <p>Soos ek kortliks aan Mnr Chris Buchner genoem het, is ek tans werksaam op die Golden Valley Wind Energy Facility as EPC Site Civil Engineer vir Goldwind Africa. Die projek nader sy einde en ek wil hoor of ek die ontwikkelaar en/of kontrakteur(s) se kontakbesonderhede by u kan kry. Ons projekspan is almal op kontrakbasis aangestel en die kontrakte verstryk in Maart 2021. Indien dit moontlik is, sal ek graag my CV by die HR Departement wou uitkry, sodat ek aansoek kan doen vir 'n moontlike pos.</p>	<p>Francois Havenga I&amp;AP</p> <p>E-mail: 03 December 2020</p>	<p>The BID containing the technical and process related information regarding the proposed development was distributed to the I&amp;AP (refer to <b>Appendix C6</b> of the BAR). The I&amp;AP has been registered on the project database (<b>Appendix C2</b>).</p> <p>Savannah Environmental has been appointed to conduct the environmental impact studies and is not part of the construction / operational phase of the projects.</p> <p>The I&amp;APs e-mail and attached CV was forwarded to the Applicant for record purposes.</p>

No.	Comment	Raised by	Response
	<p>Aangesien ek woonagtig is in Somerset Oos, is ek redelik naby aan die verskillende ontwikkelings wat Dries Troskie aan my genoem het. Sy plaas is blykbaar deel vand Hamlet Wind Farm, maar die ander aangrensende ontwikkelings en selfs die in Grahamstad, is bereikbaar naby.</p> <p>Indien ons kan gesels, sal ek baie waardeer.</p> <p><b>Translation:</b> I spoke to Andries Troskie and he mentioned that you are working on a group of wind farms west of Middleton.</p> <p>As briefly mentioned to Mr Chris Buchner, I am currently working at the Golden Valley Wind Energy Facility as EPC Site Civil Engineer for Goldwind Africa. The project is nearing its end and I want to hear if I can obtain the developer and / or contractor (s) contact details from you. Our project team was appointed on a contract basis which will expires in March 2021. If possible, I would appreciate it if my CV can be forwarded to the HR Department to apply for a possible position.</p> <p>Since I live in Somerset East, I am quite close to the various developments that Dries Troskie mentioned. His farm is apparently part of Hamlet Wind Farm, and the other adjacent developments and those in Grahamstown, are within easy reach.</p>		
12.	<p>I hereby write to you as an owner of two neat self catering units that are available in Adelaide. The units are in a secure location in the central town of Adelaide. Each unit consists of bedroom, a small lounge, a kitchen and a bathroom with a shower and toilet.</p>	<p>Charles Hanyani I&amp;AP  E-mail: 10 December 2020</p>	<p>The information received regarding the self-catering facilities was submitted to the Applicant for record purposes.</p>

No.	Comment	Raised by	Response
	<p>Please assist if there are any Windfarm projects which would want to utilize our cosy accommodation.</p> <p>These units are located on my property, which has a 3-bedroomed house that I am willing to rent out. The main house is fully furnished.</p>		
13.	<p>Please acknowledge the request.*</p> <p>I will also appreciate it if you can give me a schedule or time frame for the submission of comments to the process.</p> <p><b><i>*List of I&amp;APs to be registered on projects' databases.</i></b> <b><i><u>Wind Relic WEF Opposing Landowners map included in Appendix C7 of the BAR</u></i></b></p>	<p>Gwen Theron LEAP: Environmental Planner</p> <p>E-mail: 15 December 2020</p>	<p>The registration of Dr Theron and additional stakeholders listed in the email was confirmed and proof of the registrations were attached to the acknowledgement e-mail (refer to <b>Appendix C6</b> of the BAR).</p> <p>An I&amp;AP on the list could not be registered as no details were provided for <a href="mailto:pa@wrsa.co.za">pa@wrsa.co.za</a>. Information was requested from the stakeholder and the information has not been received to date.</p> <p>All registered I&amp;APs have been notified of the availability of the BAR for their review and comments (refer to <b>Appendix C6</b> of the BAR). The availability has also been advertised in the Herald (a provincial newspaper) and Hartland Nuus (a local community newspaper) (refer to <b>Appendix C3</b> of the BAR).</p> <p>The map indicating opposing landowners to the development is noted.</p> <p>All comments received from the I&amp;APs during the 30-day review period of the BAR will be recorded, included and addressed within the final BAR to be submitted to DEFF for decision-making.</p>
14.	<p>This mail is based on a notification for upcoming events at Kommadagga, as per your notification, in the region of the Eastern Cape</p>	<p>Gerhard Kapp I&amp;AP</p>	<p>The information regarding the availability of farm land for wind energy facilities has been submitted to the applicant (refer to <b>Appendix C7</b> of the BAR).</p>

No.	Comment	Raised by	Response
	<p>There is an opportunity to view more farm land, in the Kommadagga region, which I think might be of interest to you. Therefore , I want to invite you and your development Team to investigate the possibilities for a possible wind farm project.</p> <p>We can arrange accommodation, if need be, however it is subjected to confirmation in advance by email and phone call.</p> <p>I'm looking forward to hearing from you, and we'll be in touch</p>	<p>E-mail: 15 December 2020</p>	
15.	<p>Socio Economic impact on local communities.</p> <hr/> <p>Visual impact on the natural heritage area.</p> <hr/> <p>Long term ecological impact of proposed projects.</p>	<p>Louise Bussell Reservation Manager Kwandwe</p> <p>Comment Form: 16 December 2020</p>	<p>The socio-economic impacts associated with the development of the Wind Garden Wind Farm, including impacts on the existing communities, has been assessed within the Socio-Economic Impact Assessment (<b>Appendix L</b>). Both positive and negative impacts during construction and operation have been identified.</p> <hr/> <p>The Heritage Impact Assessment (<b>Appendix I</b>) considers the impact of the project on the cultural landscape of the area. The impact will be of a medium significance, however the impact can be reduced to a low impact with the implementation of the recommended mitigation measures.</p> <hr/> <p>The Ecological Impact Assessment (<b>Appendix D</b>) has identified impacts of medium significance to be associated with the development of the Wind Garden Wind Farm prior to the implementation of appropriate recommendation and mitigation measures. With the implementation of the mitigation measures, the majority of impacts would be reduced to a low significance, with only one impact of a medium significance. All impacts are considered to be acceptable. No impacts of a high significance or fatal flaws are expected to occur after implementation of the recommended mitigation measures.</p>

No.	Comment	Raised by	Response
16.	<p>Toe hulle hier was einde 2020 het hulle vir ons die 2 plaaskaarte gegee en met die kruisies aangedui waar die turbines sal wees. Die titelaktes van die plaas is Restant van die plaas [REDACTED].</p> <p><b>Translation:</b> When they were here at the end of 2020, they gave us the 2 farm maps and indicated with crosses where the turbines would be.</p> <p>The title deeds of the farm are Remainder of the farm [REDACTED].</p>	<p>Lucia Froehlich Landonwer</p> <p>E-mail: 02 February 2021</p>	<p>The properties that were discussed with the landowner do not form part of the Application for Environmental Authorisation for the Wind Garden Wind Farm.</p>
17.	<p>This is to confirm Wind Relic and Dimsum partnership from yesterday question.</p> <p>Pls could you also supply me with answer to the following questions:</p> <ol style="list-style-type: none"> <li>1. who is the project manager of the clusters of renewable energy facilities</li> <li>2. who are the directors of wind relic and all the applicants company's</li> <li>3. could you pls provide me with the shareholders certificates in wind relic and all the other applicant companies</li> <li>4. it would be appreciated if you could get back to me with a response as soon as possible. Maybe by the end of the week</li> </ol>	<p>Chad Comley I&amp;AP</p> <p>E-mail: 17 February 2021</p>	<p>The queries / requests relating to company information and/or matters do not fall within the ambit of the BA process undertaken for the Wind Garden Wind Farm.</p> <p>The information requested regarding shareholding and directorship can be obtained from the Companies and Intellectual Property Commission (CIPC).</p>
18.	<p>I hope you are well. I wonder if you could please assist me with a development. I came across in a Town Planning Notice for</p>	<p>Estelle Pillay</p>	<p>Savannah Environmental is the appointed EAP undertaking the various environmental studies for the BA process and is not</p>

<sup>1</sup> This information is protected by POPI Act and is only submitted to the decision-making authority

No.	Comment	Raised by	Response
	<p>the development of a cluster of renewable energy facility between Somerset East and Grahamstown, Eastern Cape.</p> <p>I do not have any objections, I am an interested party and I wanted to know if you would please provide me with the details of the client or any professionals involved.</p> <p>I am interested in following the progress of the various stages of this development from the town planning stages, through design and construction. I follow all the building and construction projects in South Africa and Africa right from the conceptual stages up until construction is complete.</p> <p>EIA Consultant: ? Town Planners: ? Client: ? Private Developer: ?</p> <p>Please can you provide me with the copy of the Background Information Document for this development.</p>	<p>Regional Content Researcher Projects Leads2Business</p> <p>E-mail: 22 February 2021</p>	<p>associated with or responsible for the Town Planning application. Savannah Environmental is also not part of the procurement / construction phase of these projects.</p> <p>The responses to the requested information are:</p> <ul style="list-style-type: none"> <li>• EIA Consultant: Savannah Environmental</li> <li>• Town Planners: Not part of the BA process scope of work</li> <li>• Client: Information for all the projects are included in the Background Information Document</li> <li>• Private Developer: Yes</li> </ul>