

Comments on Basic Assessment Report  
Review period 04 March 2021 – 06 May 2021  
(C&RR: Point 1)

## APPENDIX C7(5): COMMENTS RECIEVED

## Key Stakeholders and Interested & Affected Parties

## Savannah Public Process

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**From:** Ntombodidi Dilima  
**Sent:** Thursday, March 4, 2021 8:03 AM  
**To:** Savannah Public Process  
**Subject:** Re: WIND GARDEN WIND FARM and FRONTEER WIND FARM: Notification of availability of BARs for review and comment  
**Attachments:** image002.gif

Good day

Let me take this opportunity to thank you on bringing the development close to our rural area. I thank you for the information.

Regards  
Dbongs Trading (Pty)Ltd  
Ntombodidi Solo :Director

On Wed, 03 Mar 2021, 19:09 Savannah Public Process, <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)> wrote:

### WIND GARDEN WIND FARM AND FRONTEER WIND FARM, EASTERN CAPE PROVINCE

Dear Stakeholders and Interested & Affected Parties,

The development of the Wind Garden Wind Farm with a contracted capacity of up to 264MW which will include up to 47 wind turbines and the Fronteer Wind Farm with a contracted capacity of up to 213MW which will include up to 38 wind turbines are proposed to be developed near Makhanda within the Cookhouse Renewable Energy Development Zone (REDZ), Sarah Baartman District Municipality, Eastern Cape Province..

This notification serves to inform you, as a registered Interested and Affected Party (I&AP), that the Basic Assessment (BA) Reports are available for a 30-day review and comment period from **Thursday, 04 March 2021** until **Wednesday, 07 April 2021**.

The BA Reports are available for downloading from our public participation platform <https://savannahsa.com/public-documents/energy-generation/eastern-cape-cluster-of-renewable-energy-facilities/>.

The attached notification letter also provides further details regarding the availability of the BA Reports.

Kind regards,



Nicolene Venter

**Public Process**

t: +27 (0)11 656 3237  
f: +27 (0) 86 684 0547

e: [Publicprocess@savannahsa.com](mailto:Publicprocess@savannahsa.com)  
c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015



## Savannah Public Process

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**From:** Magnus van Rooyen  
**Sent:** Thursday, March 4, 2021 8:44 AM  
**To:** Savannah Public Process  
**Subject:** Re: WIND GARDEN WIND FARM and FRONTEER WIND FARM: Notification of availability of BARs for review and comment

Hi Nicolene,

Baie dankie vir die laat weet.

Onthou net om die kommentaarperiode ook aan te pas :-)

Mooi loop,

Magnus

On Thu, Mar 4, 2021 at 8:23 AM Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)> wrote:

Beste Magnus,

Baie dankie dat jy dit onder my aandag gebring het – die registrasie en kode is geoutomatiseerd, maar blyk my daar is 'n tegniese probleem. Ek rapporteur en bespreek dit met ons diensverskaffer.

Die kode soos versoek is: 3dLVEW

Magnus, dit blyk dat die tegniese probleem ook die oplaai van die verslae beïnvloed het. Ek laat weet jou die oomblik wat die verslae opgelaa is.

Vriendelike groete,

---

**From:** Magnus van Rooyen  
**Sent:** Thursday, March 4, 2021 6:15 AM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Re: WIND GARDEN WIND FARM and FRONTEER WIND FARM: Notification of availability of BARs for review and comment

Hi Nicolene,

Ek sien die skakel op julle webwerf benodig 'n kode voordat ek die dokumente kan aflaai, ek kan nie 'n kode kry op die epos waarin my registrasie bevestig is nie.

Kan jy asseblief vir my 'n kode stuur sodat ek toegang tot die dokumente kan kry.

Groete,

Magnus

On Wed, Mar 3, 2021 at 7:09 PM Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)> wrote:

### **WIND GARDEN WIND FARM AND FRONTEER WIND FARM, EASTERN CAPE PROVINCE**

Dear Stakeholders and Interested & Affected Parties,

The development of the Wind Garden Wind Farm with a contracted capacity of up to 264MW which will include up to 47 wind turbines and the Fronteer Wind Farm with a contracted capacity of up to 213MW which will include up to 38 wind turbines are proposed to be developed near Makhanda within the Cookhouse Renewable Energy Development Zone (REDZ), Sarah Baartman District Municipality, Eastern Cape Province..

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The attached notification letter also provides further details regarding the availability of the BA Reports.

Kind regards,



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Nicolene Venter

**Public Process**

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c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

## Savannah Public Process

---

**From:** Shanè Gertze  
**Sent:** Friday, March 5, 2021 10:33 AM  
**To:** Savannah Public Process  
**Subject:** RE: Savannah Environmental - Public Process Registration

Good Morning Nicolene

Hope you are well.

Please can you provide me with the shapefile/s of the locality for this project.

Regards,

Shan'e

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

**From:** [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com) <publicprocess@savannahsa.com>  
**Sent:** Friday, 05 March 2021 10:31  
**To:** Shanè Gertze  
**Subject:** Savannah Environmental - Public Process Registration

Hi Shanè Gertze

Thank you for your registration.

Use the following code to access the documentation for Eastern Cape Cluster of Renewable Energy Facilities:  
Fronteer WEF

3dLVEW

Regards  
Savannah Environmental

### Disclaimer

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## Savannah Public Process

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**From:** Bronwyn Jackson  
**Sent:** Tuesday, March 9, 2021 2:05 PM  
**To:** Savannah Public Process  
**Subject:** RE: WIND GARDEN WEF: Acknowledgement of Registration



Hi Nicolene,

Hope you are well?

Whilst our company is extremely well versed in the renewable space, I am fairly new to it and would like to connect with you if you don't mind.

Just to ask a few questions around the 9 eastern cape projects.

Would you be open to a teams chat tomorrow sometime?

Bron

Kind Regards,

**Bronwyn Jackson**  
Area Sales Manager – Border Region



How would you rate our service?



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**From:** Savannah Public Process <publicprocess@savannahsa.com>  
**Sent:** 9 March 2021 12:42

**To:** Bronwyn Jackson  
**Subject:** WIND GARDEN WEF: Acknowledgement of Registration

Dear Bronwyn,

Please receive herewith confirmation of your registration on the Fronteer WEF database.

Kind regards,



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f: +27 (0) 86 684 0547

**Nicolene Venter**

Public Participation & Social  
Consultant

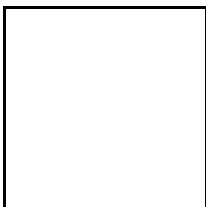
e: [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)  
c: +27 (0) 83 377 9112

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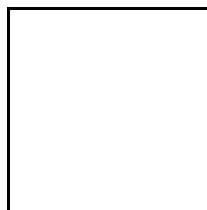
**From:** [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com) <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Sent:** Tuesday, March 9, 2021 11:32 AM  
**To:** [savannahpublicprocess@gmail.com](mailto:savannahpublicprocess@gmail.com)  
**Subject:** Savannah Environmental - Public Participation Registration

FirstName: bronwyn  
LastName : Jackson  
Email :  
PhoneNumber:  
Project: Eastern Cape Cluster of Renewable Energy Facilities- Wind Garden WEF

<https://savannahsa.com/public-documents/energy-generation/eastern-cape-cluster-of-renewable-energy-facilities/>



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**Nicolene Venter**

Public Process

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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

This communication contains privileged and confidential information intended only for the use of the addressee named above. If you are not the intended recipient of this message, you are hereby notified that you may not disseminate, copy or take any action in reliance on it. If you have received this message in error, please notify Ernst Basson Attorneys. Any views expressed in this message are those of the individual sender, except where the sender specifically states them to be views of Ernst Basson Attorneys.

BASIC ASSESSMENT PROCESSES AND PUBLIC PARTICIPATION PROCESS

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA, EASTERN

November 2020

Return completed registration and comment form to: **Nicolene Venter** or **Ronald Baloyi** of **Savannah Environmental**

Phone: 011 656 3237 / Mobile (incl. 'please call me'): 060 978 8396 / Fax: 086 684 0547

E-mail: publicprocess@savannahsa.com Postal Address: PO Box 148, Sunninghill, 2157

Your registration as an interested and/or affected party will be applicable for this project only and your contact details provided are protected by the PoPI Act of 2013

Please provide your complete contact details:

Name &	PATRICK BILLSON
Surname:	
Organisation:	BUFFALO BILLSON FARMING & WILDLIFE
Designation:	OWNER
Postal Address:	11 SUNDOWN AVE MINK PARK P.O. BOX 6001 OR
Telephone:	
Mobile:	
E-mail:	

Please indicate on which project/s you would like to register as an interested and affected party (I&AP)? (please tick the relevant box)

Wind Farms

Hamlet	Rippon	Redding	Aeolus	Wind Garden	<input checked="" type="checkbox"/>	Fronteer	<input checked="" type="checkbox"/>
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Solar Energy Facilities

Solaris Fields	Sun Garden
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REDZ 3 Power Grid Corridor 400MTS

Grid Connection Corridor
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**Note:** In terms of EIA Regulations, 2014, as amended, Regulation 43(1), you are required to register as an I&AP to receive further correspondence regarding the Basic Assessment process and comment on the Reports being made available for comments, and to disclose any direct business, financial, personal or other interest which you may have in the approval or refusal of the application (add additional pages if necessary):

Please list your comments regarding the Environmental Impact Assessment process (add additional pages if necessary):

WE OWN AND OPERATE A LOCAL AND INTERNATIONAL HUNTING OPERATION AND IT IS A REQUIREMENT THAT WE OFFER AN UNSPOILT ENVIRONMENT, WHICH INCLUDES VISUAL POLLUTIONS.

**Please provide contact details of any other persons who you regard as a potential interested or affected party:**

Name & Surname:

HAROLD VAN DER SCHYF

Postal Address:

96 11 SNOWDEN AVE MILL PARK PK 6001

Telephone:

Mobile:

E-mail:



## Nicolene Venter

---

**From:** Carl van Zyl  
**Sent:** Friday, March 12, 2021 9:51 AM  
**To:** Nicolene Venter  
**Cc:**  
**Subject:** Woodlands Safari Estate Opposes any Wind Farm Development...

Dear Nicole

I received your notice regarding the meeting on Monday.

To be 100% crystal clear - Woodlands Safari Estate Opposes any wind farm development in the Fish River Valley and surrounding regions to Grahamstown, namely; **WIND GARDEN WIND FARM AND FRONTIER WIND FARM, EASTERN CAPE PROVINCE.**

As a game reserve/ecotourism/hunting operator we have major concerns with these proposed wind farms. Please could you address the following:

1. Cape Vultures - We have a large Cape Vulture flock 20-60 birds regularly visiting Woodlands Safari Estate. How do you propose that these endangered vultures are protected and not harmed? I would gladly provide video evidence. We have hundreds of videos and evidence of their regular presence.
2. Bats - It is common knowledge that the endangered bat species are being wiped out on the Bedford flats due to the existing wind farms located there. Farmers openly talk about the amount of dead bats found under the towers. How will a new wind farm have any less effect on the bats?
3. The view - Towers spread across our view will have a negative impact on our tourism business. How do you propose we deal with this matter? Who will be accountable for damages?
4. Birds of Prey - We provide a large amount of hectares for these birds to nest and thrive in - How will these birds be affected? Many of them are endangered.

Lastly, your convenient choice of an on-line meeting largely excludes our previously disadvantaged communities who do not have access to technology. While Covid restrictions limit the options on public meetings, it is still imperative that these people who WILL be affected negatively be included as to be heard.

I look forward to an honest assessment of the above mentioned issues.

Regards,

Carl van Zyl

Woodlands Safari Estate

**BASIC ASSESSMENT PROCESSES AND PUBLIC PARTICIPATION PROCESS**

**DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA, EASTERN**

November 2020

Return completed registration and comment form to: **Nicolene Venter** or **Ronald Baloyi** of **Savannah Environmental**

**Phone:** 011 656 3237 / **Mobile (incl. 'please call me'):** 060 978 8396 / **Fax:** 086 684 0547

**E-mail:** publicprocess@savannahsa.com

**Postal Address:** PO Box 148, Sunninghill, 2157

**Your registration as an interested and/or affected party will be applicable for this project only and your contact details provided are protected by the PoPI Act of 2013**

**Please provide your complete contact details:**

Name & Surname:	Danie Jordaan		
Organisation:	Private capacity		
Designation:	Interested and affected party and representative of interested and affected parties		
Postal Address:			
Telephone:		Fax:	
Mobile:			
E-mail:			

**Please indicate on which project/s you would like to register as an interested and affected party (I&AP)?**  
(please tick the relevant box)

**Wind Farms**

Hamlet	<input checked="" type="checkbox"/>	Rippon	<input checked="" type="checkbox"/>	Redding	<input checked="" type="checkbox"/>	Aeolus	<input checked="" type="checkbox"/>	Wind Garden	<input checked="" type="checkbox"/>	Fronteer	<input checked="" type="checkbox"/>
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**Solar Energy Facilities**

Solaris Fields	<input checked="" type="checkbox"/>	Sun Garden	<input checked="" type="checkbox"/>
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**REDZ 3 Power Grid Corridor 400MTS**

Grid Connection Corridor	<input checked="" type="checkbox"/>
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**Note:** In terms of EIA Regulations, 2014, as amended, Regulation 43(1), you are required to register as an I&AP to receive further correspondence regarding the Basic Assessment process and comment on the Reports being made available for comments, and to disclose any direct business, financial, personal or other interest which you may have in the approval or refusal of the application (add additional pages if necessary):

<p>I declare that I do not have a direct interest in the bidding entities and the outcome of the application in relation to the bidding parties' interests in the proposed projects.</p> <p>There are, however, have a range of business, financial, personal and other interests that will be directly and irreversibly harmed in the event that the applications are approved, seperately and jointly as a whole project and in combination with other projects.</p>
--

**PLEASE TURN OVER PAGE**

**Please list your comments regarding the Environmental Impact Assessment process** (add additional pages if necessary):

I reserve my rights to comment on the Environmental Impact Assessment process and the outcomes of the Environmental Impact Assessment and any other assessments and reports that flow from this process

**Please provide contact details of any other persons who you regard as a potential interested or affected party:**

Name & Surname:

Postal Address:

Telephone:

Mobile:

E-mail:


## Savannah Public Process

---

**From:** Lisa Opperman  
**Sent:** Tuesday, March 23, 2021 9:26 AM  
**To:** Christopher Pike  
**Cc:** Savannah Public Process  
**Subject:** RE: Fronteer Wind Farm

Dear Chris,

The surrounding land use and activities of the area have been investigated and where sensitive land use activities have been identified these are assessed within the Socio-Economic Impact Assessment (Appendix L of the Basic Assessment Report) and considered in the Basic Assessment Report. Which includes impacts to eco-tourism and the related activities.

My request for more detail of the specific land use on the game reserve in question is to obtain your inputs in terms of understanding whether there are any other specific sensitive land use activities that must further be considered or addressed by the specialists and included in the Basic Assessment Report. The aim of the public participation process is for the sharing of information between the Environmental Assessment Partitioner and the Interested and Affected Parties which enables a thorough process in providing the Department of Environment, Forestry and Fisheries with all information to make an informed decision.

I look forward to hearing from you.

Kind regards  
Lisa

---

**From:** Christopher Pike  
**Sent:** Tuesday, 23 March 2021 09:06  
**To:** Lisa Opperman <lisa.o@savannahsa.com>  
**Cc:** Savannah Public Process <publicprocess@savannahsa.com>  
**Subject:** Re: Fronteer Wind Farm

Dear Lisa  
Surely you should have investigated the surrounding land use during your basic assessment?  
Regards  
Chris Pike  
Lukhanyo Game Reserve

On Mon, Mar 15, 2021 at 9:34 PM Lisa Opperman <[lisa.o@savannahsa.com](mailto:lisa.o@savannahsa.com)> wrote:

Dear Chris,

Thank you for your email. Your objection to the project, as an adjacent landowner, is noted.

I acknowledge your concern pertaining to the impact of the project on your current land use. Please can you provide more details of what your current land use entails so that the concerns may be addressed accordingly. I take note that your property forms part of a game reserve.

## Savannah Public Process

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**Sent:** Tuesday, March 23, 2021 9:26 AM  
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**Sent:** Tuesday, 23 March 2021 09:06  
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I look forward to receiving your feedback.

Kind regards

Lisa

savannah  
environmental

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**Lisa Opperman**  
Environmental Consultant

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c: +27 (0) 84 920 3111

[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

---

**From:** Christopher Pike  
**Sent:** Monday, 15 March 2021 17:10  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Fronteer Wind Farm

Att: Savannah Environmental

I would hereby reserve our right to strongly oppose this planned windfarm, which has already failed on 2 separate occasions before.

As a direct neighbour to the proposed properties for development, the windfarm will have a strong negative effect on our land use.

Regards

Chris Pike

Lukhanyo Game Reserve

## Savannah Public Process

---

**From:** Christopher Pike  
**Sent:** Monday, March 15, 2021 5:29 PM  
**To:** Savannah Public Process  
**Subject:** Fronteer Wind Farm - CBAs

Att: Savannah Environmental

In the BA 8.4.3 / IV CBA's

You state that 1 turbine will be situated in CBA 1 and 7 in CBA 2 and most of the affected area is in ESA zones. You then disregard this (the East Cape Biodiversity plan) over assumptions on why the areas were proclaimed as such and place the turbines in this area.

Please could you explain this?

Regards  
Chris Pike  
Lukhanyo Game Reserve

## Savannah Public Process

---

**From:** Christopher Pike  
**Sent:** Monday, March 15, 2021 5:39 PM  
**To:** Savannah Public Process  
**Subject:** Fronteer Wind Farm - Birds

Att: Savannah Environmental

On looking through your Avifaunal reports I have found a few things I would like clarified.

- 1.) You have noted a Verreaux's Eagle nest and its buffer zones - but then still place a turbine in this zone?
- 2) As a direct neighbour to the development, you have not attempted to make contact to do studies of areas that fall within the proclaimed buffer zones around your turbines.
- 3.) Lukhanyo has several cliff areas that hold raptors which are in close proximity to the proposed turbine positions!
- 4.) Please could you explain how a complete study of the area was done considering the Extended lockdown period in 2020 where you would not have been allowed to operate? This would include all your study programs?

Regards  
Chris Pike  
Lukhanyo Game Reserve



## Savannah Public Process

---

**From:** Christopher Pike  
**Sent:** Monday, March 15, 2021 4:32 PM  
**To:** Savannah Public Process  
**Subject:** Fronteer Wind Farm

Att: Savannah Environmental

I will be attending this evening's online meeting but will not be able to attend tomorrow's due to Load shedding.

This however brings into question why there will only be online meetings.

With Covid regulations set at Level 1 there is an allowance for gatherings of up to 100 persons indoors and 250 outdoors. Why is this not being done?

Online meetings discriminate highly against those within the affected area that do not have access to devices, or signal and or data that allows them to participate.

I find this to be an unacceptable practice that has been adopted.

A fully inclusive meeting plan needs to be found!

Regards

Chris Pike  
Lukhanyo Game Reserve

## Savannah Public Process

---

**From:** Christopher Pike  
**Sent:** Monday, March 15, 2021 5:45 PM  
**To:** Savannah Public Process  
**Subject:** Fronteer Wind Farm - Visual mitigation

Att: Savannah Environmental

Please could you explain how you are going to mitigate the visual effect of 2 turbines directly in front of the Lukhanyo lodge and well at several others visible from the decks.  
Destruction of this pristine view is not acceptable! It will have a massively negative effect on our tourism.

Regards  
Chris Pike  
Lukhanyo Game Reserve

## Savannah Public Process

---

**From:** Lisa Opperman  
**Sent:** Tuesday, March 23, 2021 9:51 AM  
**To:** Christopher Pike  
**Cc:** Savannah Public Process; Jo-Anne Thomas  
**Subject:** RE: Fronteer Wind Farm - CBAs

Dear Chris,

Thank you for the confirmation.

The Ecological Specialist (as per the Ecological Impact Assessment which is included as Appendix D of the Basic Assessment Report) has considered the impact of the project on the CBAs as well as the on-ground conditions and reasons for the areas being defined as CBA. The specialist report indicates (section 3.6 of Appendix D):

*The majority of the site is classified as ESA, while there is a small extent of CBA 1 within the central part of the site and some CBA 2 in the south and west of the site. The areas classified as "other natural areas" are simply natural areas that do not fall into any of the other categories and are not required to meet any targets. The reasons layer associated with the CBA map indicates that the CBA 1 is based on the presence of two vegetation types (Albany Broken Veld and Kowie Thicket) as well as the presence of a listed reptile, which although not specified can be assumed to be the Albany Sandveld Lizard. Although this reptile was previously listed as Near Threatened, it has been down listed to Least Concern in the most recent assessment. The CBA 2 in the west of the site is based on the presence of two vegetation types (Albany Broken Veld and Bhisho Thornveld), while the CBA 2 in the south of the site is due to the presence of the same two vegetation types as well as the presence of a listed plant species which isn't identified.*

*Based on the above information, the CBAs within the site are based largely on ecological processes such as transitions between vegetation types. The development of the wind farm would add to transformation in the area and increase fragmentation of the landscape to some degree. However, the total footprint is however low and very unlikely to compromise the overall ecological functioning of the affected CBAs and the landscape in general. Since, the CBAs are not based on the known presence of specific biodiversity features of high value, the wind farm is considered largely compatible with biodiversity maintenance in the area and as such, the potential impact on the affected CBAs and ESAs is considered acceptable.*

Considering the above, the CBAs have not been disregarded, but rather considered in terms of what on-ground features and characteristics the CBAs represent, as well as the extent of the development footprint proposed within such areas. The specialist indicates that due to the lack of specific biodiversity features of high value the project is largely acceptable in terms of impact considering the on-ground conditions.

Please let me know should you have any further queries in this regard.

Kind regards  
Lisa

---

**From:** Christopher Pike ·  
**Sent:** Tuesday, 16 March 2021 15:02  
**To:** Lisa Opperman <lisa.o@savannahsa.com>  
**Cc:** Savannah Public Process <publicprocess@savannahsa.com>; Jo-Anne Thomas <joanne@savannahsa.com>  
**Subject:** Re: Fronteer Wind Farm - CBAs

Dear Lisa

Yes, my mistake. My mail query was in regards to the CBA's was in regards to the Wind Garden Wind Farm

Regards

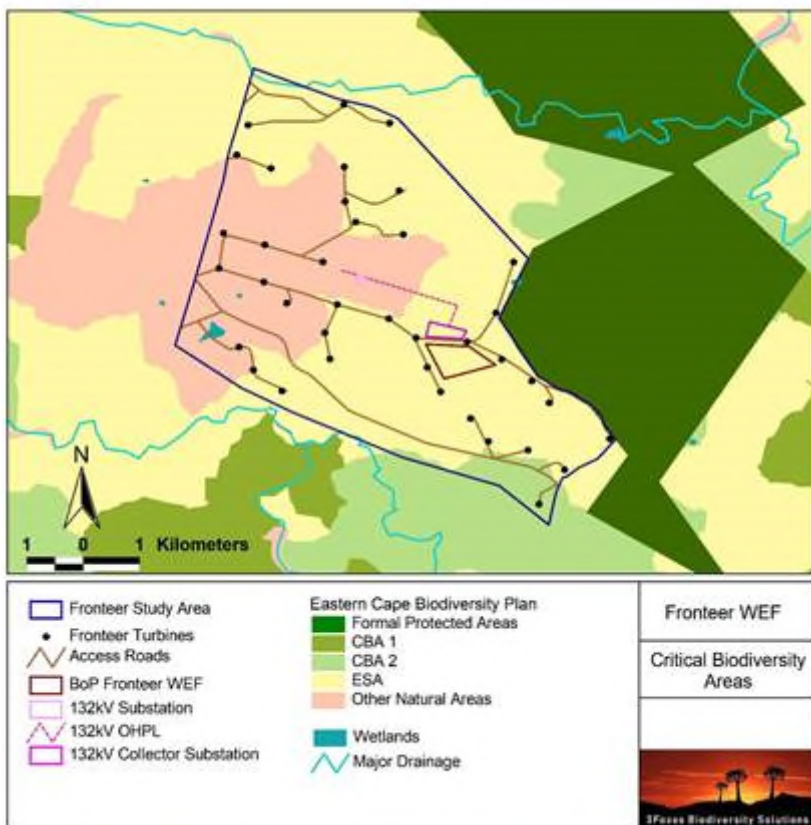
Chris Pike  
Lukhanyo Game Reserve

On Mon, Mar 15, 2021 at 9:33 PM Lisa Opperman <[lisa.o@savannahsa.com](mailto:lisa.o@savannahsa.com)> wrote:

Dear Chris,

Thank you for your query below.

Just for confirmation, please can you advise whether your query below is for the Fronteer Wind Farm or the Wind Garden Wind Farm, as the Fronteer Wind Farm does not include any areas considered to be CBA1. Please see the map below for Fronteer for ease of reference (as sourced from the Ecological Impact Assessment).



I look forward to hearing from you.

Kind regards

Lisa



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f: +27 (0) 86 684 0547

**Lisa Opperman**  
Environmental Consultant

e: [lisa.o@savannahsa.com](mailto:lisa.o@savannahsa.com)  
c: +27 (0) 84 920 3111

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**From:** Christopher Pike  
**Sent:** Monday, 15 March 2021 17:29  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Fronteer Wind Farm - CBAs

Att: Savannah Environmental

In the BA 8.4.3 / IV CBA's

You state that 1 turbine will be situated in CBA 1 and 7 in CBA 2 and most of the affected area is in ESA zones.

You then disregard this (the East Cape Biodiversity plan) over assumptions on why the areas were proclaimed as such and place the turbines in this area.

Please could you explain this?

Regards

Chris Pike

Lukhanyo Game Reserve

## Savannah Public Process

---

**From:** Savannah Public Process  
**Sent:** Monday, May 3, 2021 3:03 PM  
**To:** Christopher Pike  
**Subject:** RE: Water usage on the Fronteer and Wind Garden

Dear Christopher,

Please receive herewith acknowledgement of your comments submitted in your e-mail below.

It is forwarded to the project team for a response.

Kind regards,



t: +27 (0)11 656 3237  
f: +27 (0) 86 684 0547

Nicolene Venter  
**Public Process**

e: [Publicprocess@savannahsa.com](mailto:Publicprocess@savannahsa.com)  
c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

---

**From:** Christopher Pike  
**Sent:** Friday, April 30, 2021 4:32 PM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Water usage on the Fronteer and Wind Garden

Hi Savannah

I would like to point out what I find to be a fatal flaw in both the proposed Fronteer and Wind Garden Windfarms. The water usage figures during construction are stated at 24 453 430L for the Fronteer Wind Farm and 31 701 100L for the Wind Garden Wind Farm.

That is an overall usage of just over 56 Million Litres of water, which your BA report states will be taken from local boreholes.

As a farmer directly neighbouring this proposed windfarm, I find this figure to be unattainable.

Please can you share the studies conducted showing the availability of this water and assist in answering the following questions:

- A: What will the permanent effect on ground water levels be on the properties where the proposed windfarms will be situated?
- B. Water availability for the watering and production of stock on these properties - how will this be affected during construction and after.
- C. What cumulative effect will this withdrawal have on the surrounding area's ground water levels?

Please consider this a subject close to every farmer in the area's heart! We are in an extended period of drought and ground water is the lifeline our stock, our wildlife and ourselves rely on for survival!

Regards

Chris Pike  
Lukhanyo Game Reserve

I look forward to receiving your feedback.

Kind regards

Lisa

savannah  
environmental

t: +27 (0) 11 656 3237  
f: +27 (0) 86 684 0547

**Lisa Opperman**  
Environmental Consultant

e: [lisa.o@savannahsa.com](mailto:lisa.o@savannahsa.com)  
c: +27 (0) 84 920 3111

[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

---

**From:** Christopher Pike  
**Sent:** Monday, 15 March 2021 17:10  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Fronteer Wind Farm

Att: Savannah Environmental

I would hereby reserve our right to strongly oppose this planned windfarm, which has already failed on 2 separate occasions before.

As a direct neighbour to the proposed properties for development, the windfarm will have a strong negative effect on our land use.

Regards

Chris Pike

Lukhanyo Game Reserve



## Savannah Public Process

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Chris Pike  
Lukhanyo Game Reserve

## Nicolene Venter

---

**From:** Nick Orphanides  
**Sent:** Thursday, May 6, 2021 8:25 PM  
**To:** Nicolene Venter  
**Cc:** Savannah Public Process; Richard Summers  
**Subject:** Comments

Dear Nicolene

I wish to table following as concerns as i don't see the discussions we had at the public forum reflected in your recent documents.

1. In the wind relic BARs the entire western boundary of Clifton farm boundary has been impinged upon by the Wind garden footprint by between 600m and 700m. This must be rectified, it is a glaring oversight and an unacceptable display of lack of attention to detail.
2. The very proximity of the windmills on Thursford will be intrusively visible from the main dwelling on Clifton, as they are approximately 800m away. The one is destined to occupy prime position on top pf a hill adjacent to the homestead. This pertains not only to the visual effect of the turning blades, potential flicker but also the bright strobe lights. The Waainek windmills 20km away are glaringly visible as are the industrial scale wind farms near Cookhouse, a minimum of 55 km away.
3. The sound generated by the windmills being upwind (south and south west) most of the year constitutes a totally unacceptable invasion on the quiet, rural setting in which we have invested and tried to capture for the future.
4. In both of the BARs it claims that there will be 52 million litres of water used in the construction to commissioning phase of the frontier and wind garden developments. How is that magnitude or volume of water to be found in an area that has such a notoriously fragile subterranean water system. I would be extremely concerned if that amount of water was attempted to be extracted. Many boreholes in the area are generally being utilised on a minimal extraction basis, if at all, and we have just had the supposed rainy season!
5. Given that we are employing a decent number of staff from neighbouring properties, the destructive effect of the wind farm on the propects of the commercial viability of the investments made in the property, these employees will lose their jobs - fact. Many of these people are employed to remove alien and invasive plant species in a concerted effort to restore the biodiversity integrity of the property.
6. The underlying premise of our business proposition at Clifton is that we have made significant investment in the lodging and infrastructure gearing toward the peaceful experience and the notorious East Cape sense of place. This has been designed to combine strongly with the striking natural features and vast unimpeded views from various parts of the property. The result of the wind farm development will be to completely eradicate any prospect of a natural experience and also the investments to date as well as the future investments on the property.
7. Diminution of value of the surrounding properties. I saw a link on your online documents somewhere that referred to a Danish system whereby a valuation is done and if the decrease in value is >1% then the developer has to compensate the landowner in full! Interesting.
8. The concept of 200-600 workers in the area for a period of 2-3 years will have potentially threatening consequences vis a vis security, traffic, transgressions and potential crime. The word "mitigate" doesn't magically make these types of problem disappear.
9. The premise that the wind farm generates employment does not sit well. There are a mooted 31 employees, of which 5 or so I worked out were to be locals. Its well known that

the same teams and contractors move around from site to site and cobble together the windmills and then move on. I struggle to see the pouring of money into local economy...

Regards  
Nick Orphanides

## Savannah Public Process

---

**From:** Nick Orphanides  
**Sent:** Thursday, May 6, 2021 4:51 PM  
**To:** Savannah Public Process; Nicolene Venter  
**Cc:** Richard Summers  
**Subject:** Incorrect boundaries for the wind garden wind farm

Dear Nicolene

As I raised in the public meeting in Grahamstown the boundary for of the eastern side of the Portion 4 Remainder of Van der Merwes Kraal no 132 is completely incorrect. It encroaches upon approximately 700m of Clifton property all the way down the western boundary. The boundary of Clifton has a fair amount of land on the WEST of the R350 along the old R350 to Bedford as well. Please redraw your documents accordingly. This is an oversight of some gravity.

Regards  
Nick Orphanides

## Savannah Public Process

---

**From:** Savannah Public Process  
**Sent:** Tuesday, March 30, 2021 3:52 AM  
**To:** Giles & Jennifer Gush  
**Subject:** Comment on Wind Garden Wind Farm & Fronteer Wind Farm: Response from Social Specialist

Dear Giles,

With reference to my e-mail below, herewith the response from the Social Specialist.

Urban-Econ Development Economists undertook an independent specialist Socio-economic Impact Assessment Report (SEIA) for both proposed wind farms of Fronteer and Wind Garden.

In both studies, an entire chapter was dedicated to exploring the business potential impacts on the local tourism industry. [Note Chapters 6 in both aforementioned studies]. In addition, a specific chapter also explored potential impacts associated with property values of surrounding farms and tourism business enterprises. [Note Chapters 7 in both aforementioned studies].

From a scientific research methodology perspective, a combination of primary and secondary research analysis and reviews were undertaken. Of worthy mention:

- Reviews of internationally published literature exploring the impacts of wind farms on nearby tourism businesses and similar enterprises (pertaining to changes in visitor numbers and business performance)
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Reference is hereby made to some of the key findings stated in both reports pertaining to the potential impacts of the proposed wind farms on the local tourism industry:

- *Scenery can be said to have a monetary value, and attractive landscapes and natural beauty are important factors for tourists visiting a specific area.*
- *The overall attitude towards wind farms (either positive or negative) does not always translate into action, i.e. a negative attitude towards wind farms does not imply that a tourist will not visit or come back to the area. Therefore, research undertaken reveals that the actual losses of tourists, if any, are usually considerably smaller than the share of people with a negative attitude towards wind farms.*
- *Local residents in close proximity to wind farms, are more likely to have negative perceptions and attitude towards wind farms than tourists due to the NIMBY syndrome. This is particularly the case for those residents or stakeholders who are not involved and benefiting from the project.*
- *Overall, public opinion with regard to the negative impacts of wind farms on tourism is higher during the planning and construction stage and considerably lower during the operation stage.*
- *Studies undertaken in other Eastern Cape areas in which windfarms have been developed have shown that game farm business owners have not noted any material change to their business activities post-development.*



## Savannah Public Process

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- *Studies undertaken in other Eastern Cape areas in which windfarms have been developed have shown that game farm business owners have not noted any material change to their business activities post-development.*

- *The net positive impacts associated with the development and operation of the proposed wind energy facility are expected to outweigh the net negative effects. The project is also envisaged to have an overall positive stimulus on the local economy.*

Kind regards,



t: +27 (0)11 656 3237  
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Nicolene Venter  
**Public Process**

e: [Publicprocess@savannahsa.com](mailto:Publicprocess@savannahsa.com)  
c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

---

**From:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Sent:** Tuesday, 23 March 2021 05:11  
**To:** \_\_\_\_\_  
**Subject:** RE: Comment on Wind Garden Wind Farm & Fronteer Wind Farm

Dear Giles

Thank you for the comments submitted as owner of Woodbury Tented Camp on Amakhala Game Reserve, all part of Indalo Protected Environment.

The comments are forwarded to our social specialist (covering tourism impacts) for assessing and addressing the comments submitted.

Kind regards,



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---

**From:** Giles & Jennifer Gush  
**Sent:** Wednesday, March 17, 2021 8:43 AM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Cc:** Nicolene Venter <[nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)>  
**Subject:** Comment on Wind Garden Wind Farm & Fronteer Wind Farm

Dear Nicolene

Giles Gush commenting as an owner of Woodbury Tented Camp on Amakhala Game Reserve, which is part of the Indalo Protected Environment.

The Eastern Cape has become a world renown wildlife tourism and safari destination over the last twenty years, in spite of great competition from other more well know areas such as in Mpumalanga and Limpopo. This has created many job opportunities for a wide spectrum of people from unskilled labour, through to house keepers, barmen, maintenance staff, cooks, chefs, guides, anti-poaching units, ecologists, lodge and wildlife managers and business owners. The positive knock on effect of the wildlife tourism and safari industry to the whole economy of the Eastern Cape should not be underestimated.

It is my opinion that the development of wind farms in the Eastern Cape puts the whole wildlife tourism and safari industry at risk of collapse. The industry has developed in an environment which is already in a fairly developed space, with main roads and towns already detracting from the guest experience. I am fairly certain that the visual impact of wind farms will tip the balance in favour of other wildlife destinations with our guests and tour operators closing down a whole industry.

I believe that the negative impact on the safari and tourism industry will be far greater than any benefit that the wind farms will generate.

Regards

Giles Gush

IMPORTANT NOTICE: The information contained in this email is confidential and may contain proprietary information. It is meant solely for the intended recipient. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted in reliance on this, is prohibited and may be unlawful. No liability or responsibility is accepted if information or data is, for whatever reason corrupted or does not reach its intended recipient. No warranty is given that this email is free of viruses. The views expressed in this email are, unless otherwise stated, those of the author and not those of Urban-Econ Development Economists (PTY) LTD registration 2012/220355/07 or its management. Urban-Econ Development Economists (PTY) LTD registration 2012/220355/07 reserves the right to monitor, intercept and block emails addressed to its users or take any other action in accordance with its email use policy.

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**Nicolene Venter**

---

**From:** Raymond Goncalves  
**Sent:** Friday, March 19, 2021 1:41 PM  
**To:** Savannah Public Process  
**Subject:** Re: Comment on Wind Garden Wind Farm & Fronteer Wind Farm

Hi Savannah

Thank you I am happy to be registered on these data bases.

Kind Regards

Raymond

**RAYMOND GONCALVES**  
*Chief Operating Officer*



[www.lionroars.com](http://www.lionroars.com)

FOLLOW US:   

On 19 Mar 2021, at 13:31, Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)> wrote:

Dear Raymond,

Thank you for the comments submitted below on behalf of the Owners of Bukela and Hlosi Game Lodge on Amakhala Game Reserve, all part of Indalo Protected Environment.

The comments are forwarded to our social specialist (covering tourism impacts) for assessing and addressing the comments submitted.

Raymond, I took the liberty of registering you on these two projects' databases (see proof attached) – please confirm that you agree to this approach.

Kind regards,

<image012.png>

t: +27 (0)11 656 3237  
f: +27 (0) 86 684 0547

Nicolene Venter  
**Public Process**

<image013.gif> e: [Publicprocess@savannahsa.com](mailto:Publicprocess@savannahsa.com)  
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---

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**Sent:** Thursday, March 18, 2021 12:27 PM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Comment on Wind Garden Wind Farm & Fronteer Wind Farm

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Raymond Goncalves

**RAYMOND GONCALVES**  
*Chief Operating Officer*

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## Savannah Public Process

---

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**Sent:** Tuesday, March 30, 2021 3:47 AM  
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- *The overall attitude towards wind farms (either positive or negative) does not always translate into action, i.e. a negative attitude towards wind farms does not imply that a tourist will not visit or come back to the area. Therefore, research undertaken reveals that the actual losses of tourists, if any, are usually considerably smaller than the share of people with a negative attitude towards wind farms.*
- *Local residents in close proximity to wind farms, are more likely to have negative perceptions and attitude towards wind farms than tourists due to the NIMBY syndrome. This is particularly the case for those residents or stakeholders who are not involved and benefiting from the project.*
- *Overall, public opinion with regard to the negative impacts of wind farms on tourism is higher during the planning and construction stage and considerably lower during the operation stage.*
- *Studies undertaken in other Eastern Cape areas in which windfarms have been developed have shown that game farm business owners have not noted any material change to their business activities post-development.*



- *The net positive impacts associated with the development and operation of the proposed wind energy facility are expected to outweigh the net negative effects. The project is also envisaged to have an overall positive stimulus on the local economy.*

Hope you find above-mentioned in order.

Kind regards,



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Nicolene Venter  
**Public Process**

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c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

---

**From:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Sent:** Friday, 19 March 2021 13:32  
**To:** Raymond Goncalves · \_\_\_\_\_  
**Subject:** RE: Comment on Wind Garden Wind Farm & Fronteer Wind Farm

Dear Raymond,

Thank you for the comments submitted below on behalf of the Owners of Bukela and Hlosi Game Lodge on Amakhala Game Reserve, all part of Indalo Protected Environment.

The comments are forwarded to our social specialist (covering tourism impacts) for assessing and addressing the comments submitted.

Raymond, I took the liberty of registering you on these two projects' databases (see proof attached) – please confirm that you agree to this approach.

Kind regards,



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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

---

**From:** Raymond Goncalves  
**Sent:** Thursday, March 18, 2021 12:27 PM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Comment on Wind Garden Wind Farm & Fronteer Wind Farm

Dear Nicolene

Raymond Goncalves commenting on behalf of Owners of Bukela and Hlosi Game Lodge on Amakhala Game Reserve, which is part of the Indalo Protected Environment.

The Eastern Cape has become a world renowned wildlife tourism and safari destination over the last twenty years, in spite of great competition from other more well known areas such as in Mpumalanga and Limpopo. This has created many job opportunities for a wide spectrum of people from unskilled labour, through to house keepers, barmen, maintenance staff, cooks, chefs, guides, anti-poaching units, ecologists, lodge and wildlife managers and business owners. The positive knock on effect of the wildlife tourism and safari industry to the whole economy of the Eastern Cape should not be underestimated.

Development of wind farms in the Eastern Cape puts the whole wildlife tourism and safari industry at risk of collapse. The industry has developed in an environment which is already in a fairly developed space, with main roads and towns already detracting from the guest experience. I am fairly certain that the visual impact of wind farms will tip the balance in favour of other wildlife destinations with our guests and tour operators closing down a whole industry.

The negative impact on the safari and tourism industry will be far greater than any benefit that the wind farms will generate.

Regards

Raymond Goncalves

**RAYMOND GONCALVES**

*Chief Operating Officer*



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## Savannah Public Process

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**From:** Savannah Public Process  
**Sent:** Monday, April 12, 2021 3:38 PM  
**To:** Andre van der Spuy  
**Subject:** WIND GARDEN & FRONTEER WIND FARMS: Response to e-mails  
**Attachments:** WindRelic Public Participation Plan-01.10.20.pdf; DEFF PP Plan approval email.pdf; SE2602 Wind Relic BID (Eng).pdf; POD - 88814373534 - Andre.pdf; Re: WIND GARDEN & FRONTEER WIND FARMS: Second Extension of BA Reports review and comment period

Dear Mr Van der Spuy,

Thank you for your e-mails dated 23 March 2021 and 31 March 2021.

Below the responses applicable to the above-emails:

- Tuesday, 23 March 2021:
  - E-mail was acknowledged on 23 March 2021 @ 05h37
  - Your e-mail dated 24 March 2021 @ 13h04 was responded to on the same day @ 18h27
  - Response:

The public consultation being undertaken for the Wind Garden and Fronteer Wind Farms is in accordance with the approved public participation plan for the project. This plan considers the requirements of the EIA Regulations as well as the restrictions imposed by the Regulations to reduce the risks associated with COVID-19. As such, virtual public meetings were arranged to present the findings of the BA Reports for the projects and obtain comments and inputs from I&APs. The face-to-face public meetings were requested by I&APs during the virtual public meeting held on Microsoft Teams virtual platform on 15 March 2021 at 19h00. To accommodate as many I&APs as possible four (4) public meetings were scheduled and I&APs also had the opportunity to join virtually on Microsoft Teams. Details of the public meetings and virtual platform were provided in the invitation letter and to be COVID-19 compliant to Level 1 Regulations, I&APs were requested to register their attendance for the face-to-face public meetings, although anyone could join the public meetings virtually. To avoid the link becoming corrupt or technical issues arising, I&APs who registered their attendance virtually, the Microsoft Teams link was e-mailed to them.

Your comment regarding landowners who have not been consulted is noted. It will be appreciated if you can provide us with the two (2) landowners and the one (1) occupier affected by these proposed developments who informed you that they are unaware of the public participation process being undertaken.

Our responses also to your numbered comments:

1. The Public Participation Plan (refer to Appendix C1 of both the BA Reports and the attached was approved by the Department of Environment, Forestry and Fisheries (DEFF) – refer to e-mail approval from the DEFF dated 02 November 2020 attached, included in Appendix B of the BA Reports.
2. Occupiers of the affected and adjacent properties are consulted and will continue to be consulted, as per the approved Public Participation Plan, through the Ward Councillor and subsequently, her Ward Committee Members, property owners and identified / informed community representative organisations. Written notice (letters and background information document) has been supplied to all identified adjacent landowners. Proof of this notice is contained in Appendix E of both BARs. Although not all landowners may have been identified at the start of the EIA process, this is an on-going process during the EIA. Consultation with the directly and adjacent property owners are also being undertaken to determine the best way to consult with occupiers / tenants on their properties.

3. All information relating to all projects is included in the BID for the project (attached hereto for ease of reference), and is also detailed in the BA Reports.
4. The appointed Case Officer for both the applications is Lunga Dlova ([LDlova@environment.gov.za](mailto:LDlova@environment.gov.za)).
5. Your objection regarding the public participation process has been captured in the Comments & Responses Report that will be submitted to the DEFF with the final BA Reports.
6. As your request for an electronic copy was not specified, i.e. CD or other platforms, please be informed that the BA Reports were sent on Thursday, 01 April 2021 via WeTransfer. You were also notified by e-mail and WhatsApp on 01 April 2021. Following your request for a CD, a CD and a USB containing the two BA Reports have also been couriered to you (please refer to attached proof of delivery – waybill).  
The minutes of the pre-application meeting with the DEFF are included in Appendix B of the BA Reports and attached for ease of reference.

- Wednesday, 31 March 2021

- In order to provide I&APs a reasonable opportunity to comment on the project, Savannah Environmental has, to date, undertaken the following:
  - Distribution of the project BID on 17 November 2020, providing identified parties with information on the project and inviting comment on the projects.
  - Advertising of the EIA process in two (2) newspapers i.e. a local community newspaper and a provincial newspaper on 12 November 2020 inviting parties to register on the project database, obtain information on the projects and provide comments.
  - Advertising of the availability of the BA Reports and the virtual public meetings for Wind Garden and Fronteer Wind Farms on 04 March 2021 in the same local and regional newspapers
  - Radio announcements on Radio Grahamstad.
  - Face-to-face public meetings (at the request of I&APs) in Grahamstown
  - Extension of the review period for the reports to 06 May 2021 at the request of registered parties. This extension was advertised in the above-mentioned newspapers on 01 April 2021 and 08 April 2021 respectively and all registered parties were notified via email.

As Savannah Environmental had been informed in your e-mail dated 23 March 2021 that as you live in Cape Town, it is not possible for you to attend the face-to-face public meetings, we offered you the opportunity to meet with our team member, Lisa Opperman, who was in Cape Town on Monday 29 March 2021. The purpose of this meeting would have been for her to present the same presentation as provided at the public meetings (virtual and face-to-face), providing a key summary of the environmental findings as documented in the BA Reports, and give you an opportunity to raise any issues or comments on a one-on-one engagement platform.

We took note of your 'out of office' notice (attached – 26 March 2021 @ 11h27) applicable to the extension of the BA Reports' review and comment period. Unfortunately, it did not indicate clearly when and for how long you would be out of office and how to contact you, should it be necessary.

As the review period for the BA Reports is ending on Thursday, 06 May 2021, you are most welcome to request a meeting once you have had an opportunity to review the reports. The purpose of such a meeting would be to provide you with an opportunity to raise any issues and comments regarding the proposed projects and provide an opportunity to discuss these further and provide responses as far as possible.

Your notes for the record is noted and addressed above.

As requested, and as per my response dated 24 March 2021, the e-mail correspondence to date, is shared with Jo-Anne Thomas, the registered EAP for the projects.

Mr Van der Spuy, please confirm whether your comments are applicable to both the Wind Garden Wind Farm and the Fronteer Wind Farm applications.

Kind regards,



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Nicolene Venter  
Public Process

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**From:** Andre van der Spuy  
**Sent:** Wednesday, March 31, 2021 11:08 AM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Cc:** 'Muhammad Essop'  
**Subject:** RE: WIND GARDEN & FRONTEER WIND FARMS: Attempts to secure a face-to-face discussion

Dear Ms Venter

Below refers in regard to the opportunity provided to me to meet with the team and have a “discussion” on the relevant projects (per your telephone message of Friday 26/3/2021).

It is a condition of the NEMA EIA Regulations that I&APs be granted a “reasonable” opportunity to comment on the application. Your current actions do not constitute such a “reasonable” opportunity and are clearly more of a charade and are merely a disingenuous effort to tick a procedural box.

How can you as the person evidently responsible for the public participation process continue to permit the withholding of the DBAR (and other important information) from us and which I requested (my email of 23/3/2021) over a week ago and yet you allow the continuance of the current comment period? Why are you withholding this information from us? You have offered a meeting opportunity in the absence of having provided me with this critically important information which is an obvious prerequisite for me to engage in any such meeting in a properly informed manner - I would never accept a meeting under such prejudicial circumstances as those that you offered and as a professional PPP consultant I would have expected you to ensure that such proper and obvious conditions and associated rights were correctly established **prior** to the suggested meeting. Your below effort to describe my failure to respond as a “missed ...opportunity” leads me to question your independence and integrity and you have accordingly not upheld my NEMA-prescribed rights.

For the record, I was out of town (and office) from Friday until Monday night and thus received your telephone message re the proposed meeting yesterday morning in the first instance (and I had important matters to deal with yesterday). Despite your past numerous emails to me you strangely failed to also issue the meeting invitation by email to me – had you done so you would have received an automated message informing you of my absence. I have no idea why my cellphone did not provide opportunity for you to leave a message but I had a number of other messages on it. Also, why did you fail to send me a sms which would have registered your message? With this in mind you will agree that it is rather hypocritical of you to rely solely upon cellphone and sms means to pretend to engage the “occupier” sector of the affected community when this technology’s failings are clearly apparent even here in the urban context.

To issue an invitation to meet with me on only the (business) day before implies that you think I am readily available to respond to you interests instantaneously – and your below response implies that you even consider that you have acted reasonably in the instance. Notwithstanding my work and other commitments you should also realize that I require sufficient time beforehand to liaise with other entities and the legal advisor before any meeting.

And so for the record:

- I was anyway not available on Monday for any meeting.
- I did/do not anyway have the (requested) information necessary for me to engage in a proper “discussion”.
- I am extremely busy and will be so for the next 2 weeks or so (and will be away) and thus unable to meet. However, I can meet with you thereafter conditional upon having inter alia been timeously provided with the DBAR and other requested information. I would also appreciate having the purpose of the meeting set out in writing beforehand.
- For the stated reasons your above email heading “Attempts to secure a face-to-face discussion” is misleading and false.

Please kindly advise which persons you have sent your below email to and to whom persons my above response will be sent.

Sincerely

Andre van der Spuy

---

**From:** Savannah Public Process [mailto:publicprocess@savannahsa.com]  
**Sent:** 31 March 2021 03:46 AM  
**To:** Andre van der Spuy  
**Subject:** WIND GARDEN & FRONTEER WIND FARMS: Attempts to secure a face-to-face discussion

Dear Mr Van der Spuy,

Please be informed that I made two attempts last week to contact you to discuss the possibility of meeting with my colleague, Lisa Opperman, who was in Cape Town Monday and yesterday.

Unfortunately one cannot leave a message on your mobile number as the automated answering service informs the caller that the number is not currently available and one needs to try again later.

It is unfortunately that we missed this opportunity.

Kind regards,

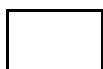


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DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Commencement of Basic Assessment & Public Participation Processes

Deborah Vromans  
To Savannah Public Process; Dr William Fowlds

Reply Reply All Forward  
Wed 3/24/2021 9:26 AM

Dear Nicolene

Please could I get the shapefile(s) for the properties associated with the WEF EIAs. We need to assess it against the Albany Biodiversity Corridor Network - Addo to Great Fish Biodiversity Assessment (by Wilderness Foundation Africa, also associated with INDALO PE - which is an amalgamation of nine private game reserves that have PA status).

I have the latest DEFF data, but would prefer the associated data direct from Savannah as I have experienced errors with the DEFF data.

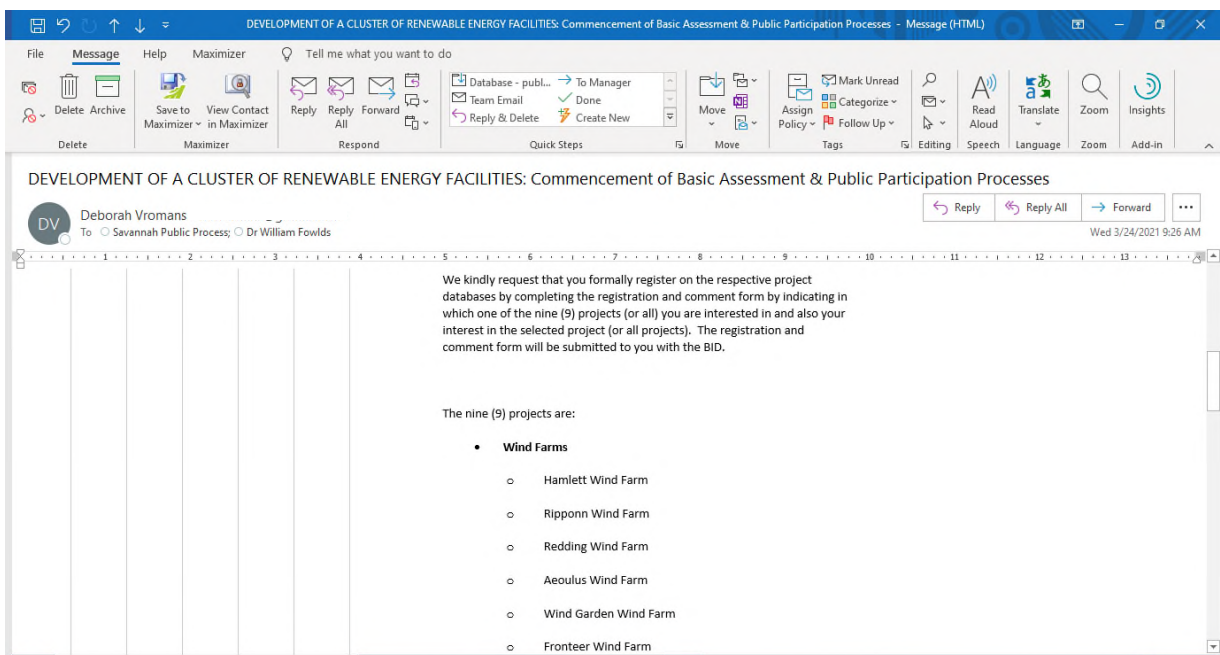
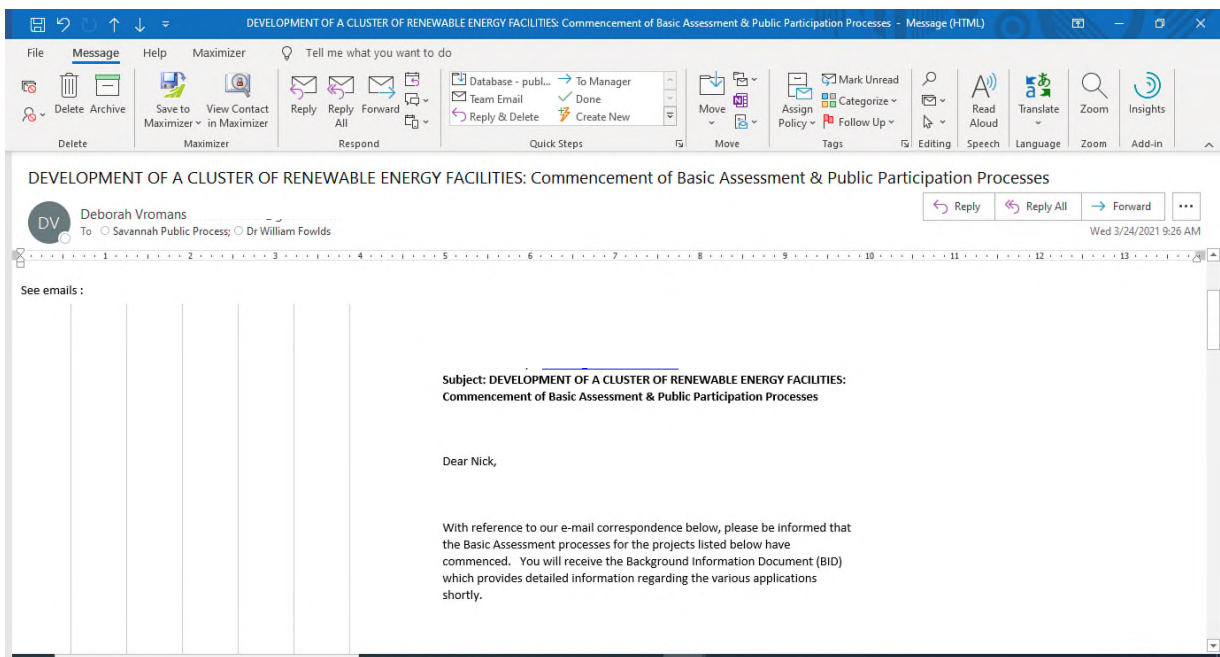
I did email last week and have not received a response. Please kindly respond.

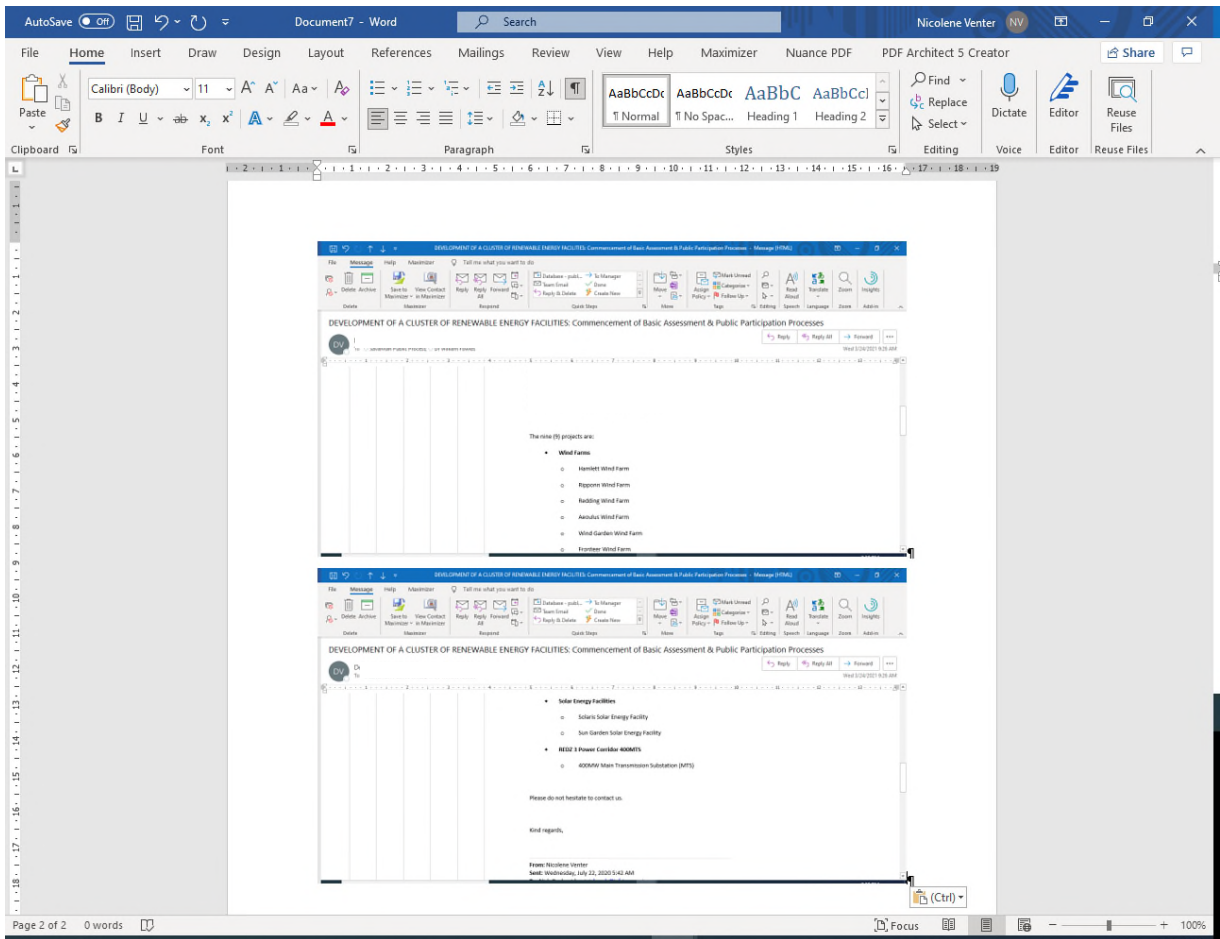
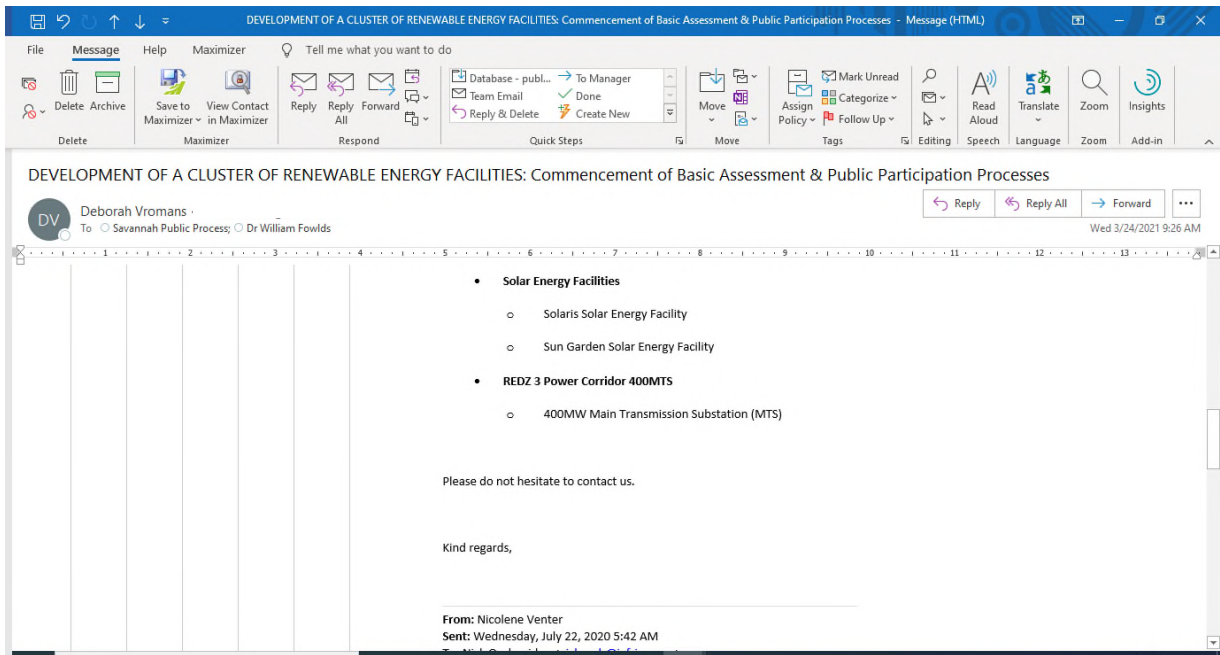
I am assisting Wilderness Foundation Africa, associated with the Nick Orphanides correspondence.

See emails :

Cc: Ronald Baloyi <Ronald@savannahsa.com>  
Subject: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES:  
Commencement of Basic Assessment & Public Participation Processes

Dear Nick,







DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Commencement of Basic Assessment & Public Participation Processes - Message (HTML)

File Message Help Maximizer Tell me what you want to do

Delete Archive Save to Maximizer View Contact in Maximizer Reply Reply All Forward Respond Quick Steps Move Assign Policy Categorize Follow Up Tags Editing Speech Language Zoom Add-in

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Commencement of Basic Assessment & Public Participation Processes

DV Deborah Vromans  
To: Savannah Public Process; Dr William Fowlds  
Wed 3/24/2021 9:26 AM

-----Original Message-----  
From: Nick Orphanides  
Sent: Tuesday, July 21  
To: Nicolene Venter <  
Subject: Wind Relic

Nicolene

I do believe that I have registered as an interested and affected party. Please confirm this to be the case or please register me for this.

Regards  
Nick Orphanides

Kind Regards  
Ms Deborah Vromans  
Environmental Scientist : Biodiversity Services Professional  
MSc: Biology, Zoology, BSc: Environmental & Geographical Science, B2D Horticulture  
Research, Planning, Monitoring and Basic Ecological Assessment, GIS Mapping

**BASIC ASSESSMENT PROCESSES AND PUBLIC PARTICIPATION PROCESS**

**DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA, EASTERN**

November 2020

Return completed registration and comment form to: **Nicolene Venter** or **Ronald Baloyi** of **Savannah Environmental**

**Phone:** 011 656 3237 / **Mobile (incl. 'please call me')**: 060 978 8396 / **Fax:** 086 684 0547

**E-mail:** publicprocess@savannahsa.com

**Postal Address:** PO Box 148, Sunninghill, 2157

**Your registration as an interested and/or affected party will be applicable for this project only and your contact details provided are protected by the PoPI Act of 2013**

**Please provide your complete contact details:**

Name & Surname:	James Harrison		
Organisation:	My wife and I are property owners and residents of Riebeek East.		
Designation:	Mr J.A. Harrison (MSc, MA)		
Postal Address:			
Telephone:		Fax:	
Mobile:			
E-mail:			

**Please indicate on which project/s you would like to register as an interested and affected party (I&AP)?**  
(please tick the relevant box)

**Wind Farms**

Hamlet	<input type="checkbox"/>	Rippon	<input type="checkbox"/>	Redding	<input type="checkbox"/>	Aeolus	<input type="checkbox"/>	Wind Garden	<input checked="" type="checkbox"/>	Fronteer	<input checked="" type="checkbox"/>
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**Solar Energy Facilities**

Solaris Fields	<input type="checkbox"/>	Sun Garden	<input type="checkbox"/>
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**REDZ 3 Power Grid Corridor 400MTS**

Grid Connection Corridor	<input checked="" type="checkbox"/>
--------------------------	-------------------------------------

**Note:** In terms of EIA Regulations, 2014, as amended, Regulation 43(1), you are required to register as an I&AP to receive further correspondence regarding the Basic Assessment process and comment on the Reports being made available for comments, and to disclose any direct business, financial, personal or other interest which you may have in the approval or refusal of the application (add additional pages if necessary):

I was involved in the EIA as field observer for avifaunal assessments on the Fronteer and Wind Garden sites.
--

**Please list your comments regarding the Environmental Impact Assessment process** (add additional pages if necessary):

I wish to object in principle to the proposed Fronteer and Wind Garden developments, based on the following points:

- 1) the presence of resident populations of threatened (Red Listed) bird species on the sites
- 2) the proximity of the sites to protected areas
- 3) the location of the sites adjacent to a route (R350) of scenic beauty and tourism significance.

Points 1 and 2 are beyond dispute and are well documented (in the EIR). Point 3 could be debated, but is relevant in our opinion.

**Please provide contact details of any other persons who you regard as a potential interested or affected party:**

Name & Surname:

Postal Address:

Telephone:

Mobile:

E-mail:


Savannah Environmental  
PO Box 148, Sunninghill, Gauteng, 2157

Public Participation Process

Dear Ms Nicolene Venter

**OBJECTIONS TO THE PROPOSED WIND GARDEN AND FRONTIER WIND-FARM DEVELOPMENTS, AND COMMENTARY ON AVIFAUNAL IMPACTS**

I refer to the specialist report on avifauna and to the peer review of that report (both obtained from the Savannah Environmental website). My comments are these:

1. While I have no fundamental problems with the manner in which the avifaunal study was carried out, I do wish to note that, as a contributing consultant (listed as JAH Environmental Consultancy), I was at no stage asked to comment on a draft report, which I believe to be an unfortunate oversight on the part of East Cape Diverse Consultants.
2. I draw attention to comments made in the peer review. That review highlights various deficiencies in reporting and interpretation of data.
3. My most important objection related to birds is the fact that it is abundantly clear that there is significant potential for negative impact on birds, included Red Listed species. These impacts include collision with wind-turbine blades. To characterize the impacts on birds as “low to medium” (Executive summary, page 4 of the specialist report) is illogical. I say this because:
  - a. The Red Listed species, especially those classified as Vulnerable or Endangered, are at levels of threat of extinction which require that every individual bird be viewed as being of high importance.
  - b. The relevant species of eagle and bustard are species with very low reproductive rates and are also very sensitive to disturbance when breeding. This means that, although relatively few individuals are at risk of negative impacts, the consequences of such impacts on the species populations in the district may be very high.
  - c. The exclusion zones for wind turbines, as defined in the report, are not adequate. The distribution modelling maps (Appendix 2) clearly show that relevant birds are likely to occur well within the development areas, even if only occasionally. A bird of a threatened species needs to hit a turbine blade only once to be eliminated from the breeding population, with the consequences highlighted under point (b), above.
  - d. I am aware that the proposed wind farms fall within a REDZ, meaning that numerous wind farms already exist in the area, and many more are planned. Without wanting to enter into a discussion on the questionable nature of the REDZ itself, it must be noted that the cumulative impact of many wind farms in the region will be significant for highly mobile species such as birds.

4. The proposed wind farms lie on either side of the R350 which is the main arterial road linking Makhanda, Riebeek East and Bedford. This is a region in which game farms and game reserves are numerous and an important sector of the local economy, through the hospitality, hunting and game breeding industries. The wind farms will radically alter the wild sense of place and negatively impact this sector. I am aware that relevant IAAPs are making submissions in this regard, therefore I will not expand on this point.
5. As a resident and property owner (in the name of my wife, Dr G.D. Harrison) in Riebeek East, I object to the impact of the wind farms on the local sense of place. Although the wind farms would not be visible from Riebeek East, they would lie on the commute route between Riebeek East and Makhanda which all residents of Riebeek East need to drive very regularly.

In view of all of the above, I register my fundamental and strong objection to the proposed Wind Garden and Fronteer wind farms which I believe should not proceed in any form or configuration.

I request that this letter be entered into the record of the public participation process, and be responded to.

Yours faithfully

James Harrison (MSc, MA, Pr.Sci.Nat.)

JAH & Son Consultancy



**25 March 2021**

Ms Nicolene Venter  
Savanah Environmental (Pty) Ltd  
5 Woodlands Drive Office Park  
Woodmead, 2191  
(Tel: 060 978 8396)

By E-mail: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

**COPY TO:**

Messrs Richard Summers Inc

By Email:

**Your Ref:** 14/12/16/3/3/2/1055  
**Direct Tel:**

**Our Ref:** E0000006  
**Direct email:**

Dear Madam,

**BASIC ASSESSMENT REPORTS: WIND GARDEN AND FRONTIER WIND ENERGY FACILITIES (DEA Ref: 14/12/16/3/3/2/1055)**

1 We represent the Indalo Private Game Reserve Association (“Indalo”), the statutory assigned Management Authority in terms of section 38(2)(b) of the National Environmental Management: Protected Areas Act, No. 57 of 2003 (“NEMPAA”) of the Indalo Protected Environment (“Indalo PE”), a declared Protected Area (“PA”). The Indalo PE includes nine (9) internationally renowned private game reserves (“member reserves”) in the Eastern Cape Province of South Africa which has brought some 76 000 ha of land under formal protection.<sup>1</sup> The Indalo PE borders

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<sup>1</sup> These PGRs are the Amakhala Game Reserve, Hopewell Game Reserve, Kariega Game Reserve, Kwandwe Game Reserve, Oceana Beach and Wildlife Reserve, Pumba Game Reserve, Shamwari Game Reserve, Sibuya Game Reserve, and the Lalibela Game Reserve.



and/or is located within the buffer zone of the Addo Elephant National Park and Great Fish Provincial Nature Reserve and other provincial protected areas and is a Biodiversity Stewardship site under the National Environmental Management: Biodiversity Act, No. 10 of 2004 (“NEMBA”). Various members of the Indalo PE and, or other nearby declared protected areas are directly or indirectly affected by the cumulative impacts of various planned and or constructed Wind Energy Facilities (“WEFs”), amongst other by the proposed Wind Garden and Frontier projects.

- 2 Indalo is competent to make these representations as Interested and Affected Party (“IAP”) to protect the rights of all its members as well as other affected proclaimed protected areas in the interest of the environment. Indalo’s comments will also support the concerns of one its members, Kwandwe Game Reserve (“Kwandwe”), with whom you have been communicating in the past through its own legal representative Messrs Richard Summers Inc. The submissions by Indalo must be read in support of and not exclusionary of the comments by Kwandwe.
- 3 We refer to your public Notice of Availability of Basic Assessment Reports for Review and Comment (“Savanah Notice”) of 3 March 2021 in which you indicated that the draft BAR for Wind Garden and Frontier are available from 4 March 2021 until 7 April for the 30 period of review and comment by Interested and Affected Parties (“IAPs”). The Savanah Notice also advised that online public meetings will have taken place on 15 March 2021 at 18h00 and on 16 March 20201 at 10h00.
- 4 Our instructions are that Indalo member reserves as well as other neighbouring property owners made attempts to join the public meeting of 15 March 2021. It is understood that the meeting was abandoned after participants that eventually succeeded in obtaining access to the meeting resolved that the meeting should be cancelled and a physical public meeting be held. You are hereby requested to include Indalo and its member reserves in your list of registered IAPs (if they have not already been added) and that you will inform them about the future physical meeting(s) and other information so that their representatives can attend and respond, where necessary.



- 5 We also refer to the letter of 10 March 2021 by Messrs Richard Summers Inc. (“Request for Extension”) to you requesting a further extension of 21 days to comment on the draft BARs due to the voluminous nature of the information contained in these two draft reports and the accompanying specialists reports which exceeds 4000 pages.
- 6 Furthermore, we refer to your response on the same day (10 March 2021) to the Summer’s Request for Extension wherein you only agreed to extend the period of public comment with 10 calendar days until 19 April 2021. This is 11 calendar days short of the requested period and is clearly inadequate in the factual context of the Wind Garden and Frontier applications.
- 7 Our instructions are to respectfully request you, which we hereby do, to reconsider your decision of 10 March 2021 and to extend the deadline for public comments with 30 days from 7 April 2021 until 6 May 2021.
- 8 The reasons for our Client’s request are as follows:
- 8.1 The High Court in *Earthlife Africa v Director General Department of Environmental Affairs and Tourism*<sup>2</sup> confirmed that the constitutional right to procedural fairness of IAPs in terms of section 24(4)(a)(v) of NEMA means that Indalo must have a **reasonable opportunity** to make comments to which regulation 3(8) of the EIA regulations stipulates a minimum timeframe of 30 days for public comment.
- 8.2 The public participation process forms a key component of the process by which landowners will discover the impact of new developments on their property and environmental rights. The Courts have held landowners (such as the traditional communities involved in those cases) to be a special category of interested and affected parties (IAPs) whose rights will be infringed by a deficient public participation process that hinders the timeous discovery and adequate investigation of defects in the reports of planned developments. Consequently, affected

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<sup>2</sup> 2005 (3) SA (C).





landowners have the right to **adequate and meaningful consultation** during the public participation process for environmental (and mining right) authorisations.

- 8.2.1 As recent as 11 September 2020 in *Baleni and Others v Regional Manager: Eastern Cape Department of Mineral Resources and Others* the High Court accepted that the early availability of the requested information through the public participation process is necessary to provide adequate opportunity for the landowner (community) to meaningfully consult with the applicant and relevant authorities about the impact of the mining development on their land.<sup>3</sup>

*“Meaningful consultation entails discussion of ideas on an equal footing, considering the advantages and disadvantages of each course and making concessions where necessary.”*<sup>4</sup>

- 8.2.2 In *Bangwenyama Minerals Pty Ltd and Others v Genorah Resources (Pty Ltd and Others)*<sup>5</sup> the Constitutional Court confirmed, amongst other, that:

*“The Community was entitled to adequate notice of the nature and purpose of the administrative action that was proposed in relation to the Genorah application. It **was entitled to a reasonable opportunity to make representations** in relation to the Genorah application. Once the administrative decision was taken the Community was entitled to a clear statement of the administrative action...”*<sup>6</sup> [Our emphasis.]

- 8.2.3 The above jurisprudence confirms that IAPs must have adequate time to receive and engage with the information provided in the two BARs about the two WEFs. The IAPs must have adequate time to employ scientists and specialists to do so on their behalf should the need for this become clear in their process of evaluating the reports. This will enable IAPs to comment meaningfully on the information in the reports about how the proposed wind farms will affect their property and environmental rights. In the present matter of Wind Garden and Frontier, the EAP

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<sup>3</sup> JOL Case 96628/2015 NGHC at para [89] – [95].

<sup>4</sup> At para [89] and [90].

<sup>5</sup> 2011 (4) SA 113 (CC) at para [63]-[70], [75]-[80].

<sup>6</sup> At para [80].



allowed **inadequate time** for the IAPs to meaningfully consider and respond to the information in the BARs about the two wind farm developments.

- 8.3 As alluded to by the Summers Request for Extension, IAPs are required to comment on applications for two WEFs which comprise about 20 specialist reports covering more than 4000 pages of information. This is a vast volume of information that IAPs must critically evaluate and where necessary familiarise themselves with specialist studies comprising complex subject material, including but not limited to sense of place and visual impact, the noise impact assessment and relevant SANS Standards, the socio-economic assessment, and the use of social accounting matrices, to mention but a few. It is an **unreasonable** expectation that the IAPs can complete this process within the allowed 40 days if comments are to be comprehensive and reasonably informed as the EIA regulations require.
- 8.4 We remind you that Indalo is **exercising its fundamental rights** to protect the environment and its members' property and environmental rights, to receive relevant information, and that a fair process is followed to do so during the Basic Assessment. These rights are protected in sections 24, 25, 32 and 33 of the Constitution read with their statutory provision in section 24 of the National Environmental Management Act, No. 107 of 1998 ("NEMA") and the EIA Regulations, 2014 and sections 3 and 6 of the Promotion of Administrative Justice Act 3 of 2000 ("PAJA"), amongst other.
- 8.5 To fulfil these constitutional rights, regulation 3(8) of the EIA regulations provides **discretionary power** to the EAP to allow more time if requested by IAPs such as the Summers Request for Extension and presently by Indalo. It is established law that a decision-maker's discretionary power must be exercised in a reasonable manner which is objectively evaluated in accordance with the fundamental rights and values of the Constitution. We submit that the EAP's decision to only allow 10 calendar days extension are unreasonable as it merely pays lip service to these fundamental rights and values to ensure that IAPs fairly participate in environmental decision-making. Given the limitations brought about by the public holidays and COVID pandemic, the EAP effectively denied IAPs' the right to a substantially fair



comment process which is why Indalo makes this request to you to provide a proper period of 60 calendar days for public comments.

- 8.6 Further to the above reasons, the failure to hold a **properly constituted and accessible public meeting** on 15 March 2021 as well as focus group meetings with amongst others property owners and conservation groups is reason to further extend the comment period to allow for such meetings to take place. If this does not happen in future, the public participation process will not be procedurally fair as it does not provide a reasonable opportunity as envisaged by section 24(4)(a)(v) of NEMA and regulation 41(6)(b) of the EIA Regulations during which IAPs can effectively (adequately and meaningfully) participate in environmental decision-making.
- 9 We advise that the failure of the EAP to comply with Indalo's request for further extension –
- 9.1 will constitute a material breach of the EAP's constitutional duty to ensure a substantially fair and reasonable EIA process for public participation by IAPs in accordance with statutory and constitutional prescripts that may affect the authorisation of the Wind Garden and Frontier WEFs;
- 9.2 may reflect poorly on the independence of the EAP by pointing to a reasonable appreciation of bias in favour of the applicant that arguably fall short of the high standard of professional conduct that is expected of EAPs; and
- 9.3 will infringe upon to Indalo's rights and may cause damages to its members.
- 10 Indalo strictly reserves all its rights, including the right to continue to submit further comments directly to the competent authority at the Department after expiry of the EAPs allocated time for public comment which the latter is obliged to consider before taking a decision. In *Earthlife Africa* referred to above, the Court confirmed that section 24(4)(a)(v) of NEMA allows Indalo a reasonable opportunity to raise its



concerns directly with the DEFF before it takes a decision.<sup>7</sup> Also refer to the judgement in *Escarpment Environment Protection Group and Another v Department of Water Affairs and Others*, 2013.<sup>8</sup>

- 11 We trust that you will reconsider your decision and act in a reasonable manner by extending the time for public comment **until 6 May 2021** as requested above. Kindly confirm to us in writing your decision **before 17h00 on 1 April 2021**, failing which it is assumed that you have refused to grant the requested extension, whereupon our Client will exercise its legal remedies.
- 12 Please confirm written receipt of this letter by **17h00 on 29 March 2021**, failing which receipt of same is assumed.

Yours faithfully

(Deemed signed, transferred electronically)

Per: Dr Ernst Basson

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<sup>7</sup> Paras [100] and [101], see also paras [95] and [98].

<sup>8</sup> 2013 JDR 2700 (GNP).

## Nicolene Venter

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**From:** Chad Comley  
**Sent:** Tuesday, April 13, 2021 3:53 PM  
**To:** Nicolene Venter  
**Subject:** Wind Relic

Hi Nicolene

Just catching up after the meeting in Grahamstown

1) Will there be a follow up meeting with WR its directors ,its partners Dimsum and Energy exchange .

If you are going to arrange a meeting could you please not on a Monday and Friday .I have children I need to pick up from school .

2) could you pls provide me with Wind Relics offices address

3)I noted at the meeting a lot of amendments were going to be made to the individual study . Would this involve a extended review period once the study have been amended .

4) When will the notes of the meeting be made available to the us .if you have any available I would like them please .

5) I would also like you to clarify who is the applicant as the application was granted to WR from the DEA .in the adverts and pamphlets it was the SPV

Thanks for your assistance in these matters

Kind regards  
Chad Comley

## Nicolene Venter

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**From:** Grant Soulé  
**Sent:** Thursday, April 15, 2021 11:42 AM  
**To:** Nicolene Venter  
**Subject:** Wind Garden wind farm and Fronteer wind farm

Hi Nicolene

I have been through the BAC report and have some objections to what seems to be a biased report.

1. The effects of the wind farm on property prices: Being a eco tourism/Hunting operation our business/Farm relies mainly on foreign visitors, I have engaged and documented clients reactions to the possibility of a wind farm being on our boundaries, and they have stated that they would not be interested in visiting properties that have wind farms surrounding them. This would result in a loss of income and a business that has no clients. Your report states that the wind farm would have little impact on property prices. Has your report taken into consideration the effect of these developments on game reserves, or just rural properties in general?? Please explain why the direct correlation between wind farms and property value / market value has been disregarded. Homesteads, residences, lodges, game reserves and tourism operations are all directly affected.
1. Socio economic effect. We currently employ 12 staff on our reserve and in season that number increases to 23. The net result would be a loss of about 80% of our work force. The reality of these farms is that post construction phase, very few local people are employed by the wind farm. Job losses will exceed any possible employment creation. Has a proper study been done to evaluate, or weigh up the difference between short term job creation versus long term losses in the tourism sector, or is your evaluation just a general one.
2. Visual/ Noise/ Traffic impact. Our lodge and housing will be severely affected by all of these, we have full view of all turbines on the Browns, Dells and Whites farm. The visual impact as a neighbouring farm is immense. There is no part of our farm that will not see most if not all Turbines as they are mostly erected on higher ground. As a neighbour we have not been visited to asses the visual/noise impact. Have simulations/photomontages been provided from all sensitive viewing areas as informed by local conditions and I&APs.
3. You speak of the increase in income for farms that benefit from the wind farms, but make no mention of the loss of income to game reserves/Eco tourism properties.
4. As a direct neighbour to the proposed development, we have not been asked to comment on the development, nor have any of our other neighbours. They however stated that farms in cookhouse and Oyster bay were asked to comment. Please explain what relevance this development has on those properties, and why we were not afforded the opportunity to comment.
5. Are there any material project flaws identified by specialists where the impact is not capable of mitigation?
6. What information gaps were known to the specialists undertaking the assessment and that were not declared / adequately articulated in the specialist reports that were released to I&APs?

On the basis of the public meeting process, (Where your expert for the socio economic study, eventually conceded that his report was flawed) is the report going to be redrafted, or is the BAC report your final submission. We were also told that we would be provided with details of all the parties interviewed for the socio economic study, can you please provide those details.

Please also provide me with the minutes of all the public meetings held.

Regards  
Grant Soulé  
Director  
E'scape Airtours Charters & Transfers  
Inyahi Game Services

Co-Ordinates: S 33°13'17" E 026°17'54"  
Postal address: Postnet Suite 243, Private bag X40106, Walmer, 6065, South Africa



Nicolene Venter  
Savanah  
Email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

21 April 2020

Dear Nicolene

**Re: Draft Basic Assessment Reports for the Proposed Wind Garden and Fronteer Wind Farms in the Eastern Cape**

Thank you for the opportunity to comment on the above application.

BirdLife South Africa supports the responsible development of renewable energy in South Africa. We recognise the contribution renewable energy can make towards mitigating climate change whilst meeting our country's energy needs. However, renewable energy must be deployed with due sensitivity to the natural environment.

The proximity of the proposed development sites to protected areas and the overlap with Critical Biodiversity Areas suggest that a precautionary approach must be adopted when evaluating the impacts. The desired state of most of the site and surroundings is that it remains in natural or near-natural condition. With this in mind, we have the following comments:

1. We welcome the inclusion of a peer review of the avifaunal assessments. However, many of the recommendations in the peer reviews have not been addressed in updated avifaunal assessment reports. We suggest that the avifaunal assessments should be updated in response to those recommendations.
2. Several key references are missing from the assessments, including SANBI's Species Environmental Assessment Guidelines (2020), Perold et al. 2020 (which summarises the diversity of birds killed by turbine collisions in South Africa) and BirdLife South Africa's Guidelines on Black Harrier (*Circus maurus*) and Wind Energy. The avifaunal assessments also do not reference a single scientific paper by Dr Murgatroyd, South Africa's leading expert on Verreaux's Eagle (*Aquila verreauxii*), despite the potential risk the proposed development poses to this species.
3. The avifaunal assessment reports do not include species' scientific names, and common names were not consistently used (e.g. Southern Black Korhaan (*Afrotis afra*) and Southern Black Bustard were used interchangeably).
4. The avifaunal assessments claim to have complied with Best Practice and with the Guidelines for Verreaux's Eagle and Wind Energy "as far as possible". The reports do not highlight the shortfalls or justify changes to the recommended approach.
5. We question if the monitoring approach was in line with the above guidelines. The Best Practice Guidelines recommend increased survey effort in potentially sensitive environments and it does not appear that the guidelines for Black Harrier and Wind Energy have been applied. Similarly, the Guidelines for Verreaux's Eagle recommended increased survey effort (i.e. 72 hours per vantage point) if there is a potential overlap with Verreaux's Eagle territories. If a precautionary approach to avoidance is not adopted for the proposed layout of turbines, the guidelines recommended that monitoring continues for two years. These recommendations have not been implemented. At most, vantage points were surveyed for 52 hours, and only the smallest nest buffers for Verreaux's Eagle have been applied. Development has not been excluded from the recommended precautionary buffers or other features associated with a high collision risk.



6. The avifaunal assessments do not address the implications of a recent paper by Murgatroyd et al. 2021. This study highlights that the previously recommended nest buffer (3 km) for Verreaux's Eagle nests is inadequate and suggests that a precautionary buffer of 5.2km would be more appropriate (in the absence of applying the Verreaux's Eagle Risk Assessment Model). This oversight is surprising given that the peer review drew attention to the paper.
7. The proposed buffers for Martial Eagle nests are also significantly less than recommended in most other impact assessments (i.e. 5-6 km). Van Eeden et al. (2017) 's research tracking Martial Eagles in the Kruger indicated a 50% Kernel Density with an average of 16.5km<sup>2</sup> - which would suggest a buffer with a radius of 2.9 km from a nest would be necessary to avoid just the core territory. Martial Eagle territories are likely to be much larger in the area of the proposed development.
8. We welcome the inclusion of spatial modelling, but we are concerned that the model may lack statistical rigour due to the limited input data (discussed above). It is also unclear how the thresholds for the predicted use categories for were determined. Importantly it is not clear how the output of these models has influenced the layout (or development envelope), if at all. As far as we can ascertain, only avoidance of small nest buffers has been proposed, and all other areas are "available" for development.
9. The map indicating the location of nests (Figure 4) suggests that nests of Secretarybirds are surrounded by proposed turbines, but the reports note that no breeding sites were found. The potential locations of roosts, breeding sites and leks of large terrestrial birds requires further investigation and assessment, and clearer reporting.
10. The avifaunal assessments makes no reference to National Environmental Screening Reports, which flag that there is potential Black Harrier breeding habitat on sites. This is not explicitly interrogated further and it is unclear if these areas were verified or not, and how this influenced the impact assessment and mitigation strategy.
11. Appendix 2 refers to buffers around Cape Vulture roosts. This is confusing since no Cape Vultures were recorded on site. We presume that this relates to other proposed development sites, but this should be clarified.
12. Confidence in the fatality rates predicted by the Collision Risk Model is very low for a number of reasons, including:
  - a. Inadequate vantage point data. This is discussed above. Furthermore, Scottish Natural Heritage (2017) recommends 72 hours per vantage point per year and two years of data collection to account for interannual variation. Given the current drought, we expect marked interannual variation at these sites and monitoring reports from other South African wind farms suggests that there can be was substantial interannual variation in both eagle activity and in fatality rates.
  - b. Avoidance rates and flight speeds for different species were used instead of drawing on data and knowledge of local species experts for the species actually at risk.
  - c. The predicted fatality rates vary markedly depending on the assumptions - this highlights that the assumptions and limitations require careful consideration.
  - d. Monitoring reports from South African wind farms suggest that Verreaux's Eagle may be at greater risk of collisions than predicted by the collision risk models. Five out of six wind farms that overlap with Verreaux's Eagle territories have reported two or more fatalities of Verreaux's Eagle (these wind farms have been operational between two and five years). The average fatality rate across the six wind farms was 0.02 Verreaux's Eagle per turbine per year, not far from the 0.05 per year predicted by Thaxter et al. (2017). but these data do suggest that that fatality rates could be higher than predicted by the collision risk models.
13. The output of Collision Risk Models should therefore be considered with caution, but it does give a sense of the potential magnitude of risk under different scenarios. It is, therefore,

BirdLife South Africa is a partner of BirdLife International, a global partnership of nature conservation organisations.  
Member of IUCN (International Union for Conservation of Nature).  
Reg No: 001 – 298 NPO  
PBO Exemption No: 930004518

- disappointing that reports did not assess the predicted impacts associated with different layouts. It is therefore unclear if the best practicable environmental option has been identified.
14. The predicted impacts were also not contextualised (e.g. with reference to the local or regional population size, background mortality, and/or population viability analysis). This is problematic as a) it is difficult to interrogate the claim that the impacts will not be significant, and b) there is no benchmark to test if impacts observed during operation are significant and will require further mitigation. BirdLife South Africa suggests that unless evidence is presented to indicate otherwise, the management objective (reflected in the EMPr) for threatened species, especially species with declining populations, should be zero fatalities.

In conclusion, given the desired state of the habitat and surroundings (i.e. natural or near-natural) and the number of threatened species potentially affected, BirdLife South Africa is of the opinion that a) the survey effort has been inadequate, b) insufficient effort has been made to minimise impacts through amending the layout of turbines, and c) it is not appropriate to adopt a "wait and see" approach to mitigate impacts during the operational phase - a much more proactive approach to minimising predictable risks to biodiversity will be necessary.

Yours sincerely



Samantha Ralston-Paton  
Birds and Renewable Energy Project Manager.



Chairman of Indalo PGRA

Postnet Suite 80, Private bag 1672  
Grahams town 6140  
Sidbury Sports Club, N2  
Eastern Cape, South Africa



General Manager: Park Planning and  
Development

P.O Box 76693  
Nelson Mandela University, 6031  
Eastern Cape, South Africa

### **Re: Review of findings of Environmental Noise Impact Assessment of Proposed Wind Energy Farm, Wind Garden Wind Power (Pty) Ltd.**

#### **1. Introduction**

1.1 The following report was commissioned at the request of Theo Fischer of EScience Associates (Pty) Ltd, email: theo@escience.co.za, tel: 011 718 6380, mobile: 082 094 9990 on behalf of Indalo Chairman of Indalo PGRA and General Manager: Park Planning and Development SANParks.

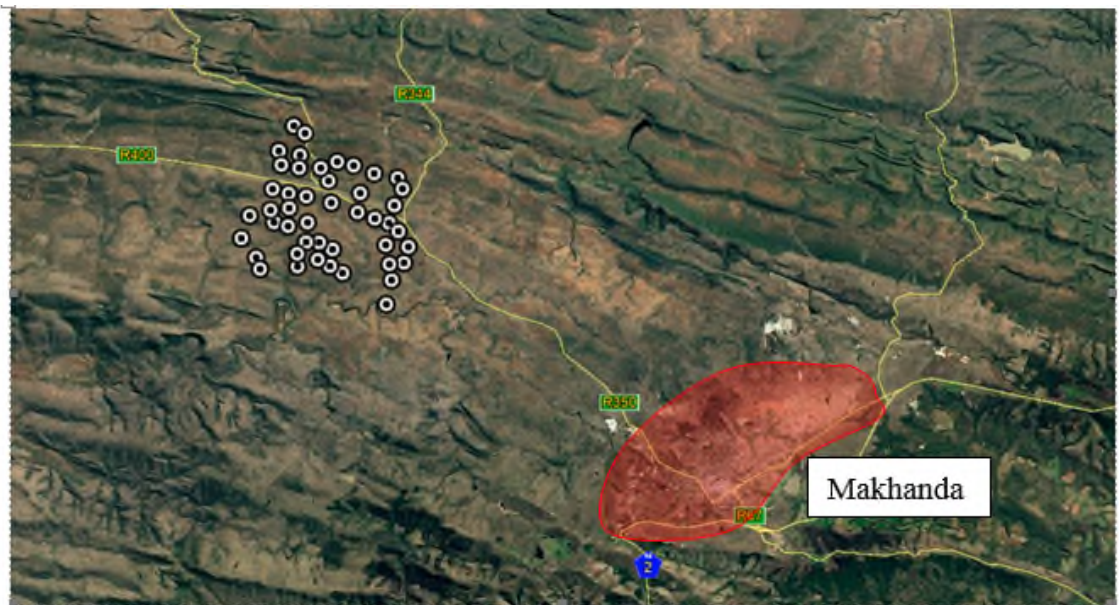
1.2 This report has been written to review the Noise Impact Assessment conducted by Enviro Acoustic Research,

De Jager, M. 2020: "Environmental Noise Impact Assessment for the proposed Wind Garden Wind Farm and associated Infrastructure Near Makhanda (Grahamstown), Eastern Cape Province".| Enviro-Acoustic Research, Pretoria

T.E. Mackenzie-Hoy Pr. Eng. Bsc (Elec) M.S.A.I.E.E., M.S.P.E., IngP (Eur), AmASA (Director)  
Rachel Viljoen BEng (Mechatronics), M. Attwood (Adv Dip S.Eng), G. Viljoen DiplQS

1.3 Henceforth referred to as the Wind Garden NIA.

1.4 Wind Garden Wind Power (Pty) Ltd proposes to construct a Wind Energy Facility (WEF) of up to 264 Megawatts (MW) installed capacity on a number of farms situated 17 km north-west of Makhanda (Grahamstown). The wind farm will host up to approximately 47 turbines, each with a capacity of 5.63 MW. It is indicated in the noise impact assessment by Enviro-Acoustic Research CC that the hub height for each turbine will not exceed 120 m “worst case scenario” and rotor tip is anticipated to reach a maximum of 200m “worst case scenario”. T The Wind Garden WEF will be immediately north-west of Makhanda / Grahamstown. The situation is geographically as below:



Proposed turbine locations shown as white circles / black dots.

## 2 Discussion

### 2.1 Ad. Paragraph 2.2: Project Description.

- 2.1.1 The report indicates that the capacity of the installation will be 264 MW and that there will be 47 wind turbines. This implies that each turbine is rated at 5,5 MW. The noise impact assessment by Enviro-Acoustic Research CC uses the data for a Vestas V150-4.2 WTG at a height of 120 m. This is a 4.2 MW turbine.
- 2.1.2 It is not known why a 4.2 MW turbine is used for the noise impact assessment by Enviro-Acoustic Research CC since it makes less noise than a 5.63 MW turbine. The 4.2 MW turbine has a sound power of 105 dBA while a 5.63 MW turbine has a sound power of 107 dBA. Due to the logarithmic nature of the decibel scale this is a 30 % increase in loudness. To use a turbine with lower power and lower noise than the proposed turbine is misleading and unscientific.
- 2.1.3 The report further states that “Land use is mostly wilderness (ecotourism) with agricultural activities (game, sheep and cattle farming).
- 2.1.4 The report ignores impacts on other sensitive environmental receptors. The report fails to mention that the turbine placement area is located within an area which has extensive game reserves with elephants, rhino and other wildlife as well as game farms. By confining the noise impact assessment to only consider noise impact on human beings the effect of the turbine noise on animals is ignored. For instance Garstang (2003)<sup>1</sup> some 15 years prior NIA comprehensively investigated elephant communication and reports that “The pervasive use of low-frequency sounds by elephants is now well established together with increasing evidence of the distances traveled and complex social functions of vocalizations at low frequencies.” In view of the wide spread literature relating to elephant communication between elephants which occurs at low frequencies (including infrasound - below audible range) this omission is fundamentally incorrect.

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<sup>1</sup> Garstang, M. Long-distance, low-frequency elephant communication. J Comp Physiol A 190, 791–805 (2004).

<https://doi.org/10.1007/s00359-004-0553-0>

[https://www.researchgate.net/publication/8363461\\_Long-distance\\_low-frequency\\_elephant\\_communication](https://www.researchgate.net/publication/8363461_Long-distance_low-frequency_elephant_communication)

T.E. Mackenzie-Hoy Pr. Eng. Bsc (Elec) M.S.A.I.E.E., M.S.P.E., IngP (Eur), AmASA (Director)

Rachel Viljoen BEng (Mechatronics), M. Attwood (Adv Dip S.Eng), G. Viljoen DiplQS)

## 2.2 **Ad. Para 3: Policies and Legal Context**

2.2.1 The report cites many regulations and standards but fails to note that the project area for the location of the Wind Garden Wind Energy Farm (WEF) falls within the Metropolitan Area of the Nelson Mandela Metropolitan Municipality (NMMM). This means that the noise pollution caused by the WEF is regulated by the NMMM Noise Control By-Law (LAN. 37 of 2010 published in PG No. 2322 of 24 March 2010) which requires measurement of environmental noise under SANS 10103:2008.

## 2.3 **Ad Para 3.6: International Guidelines**

2.3.1 There is an extensive list and listing of various international guidelines, none of which are relevant to South Africa.

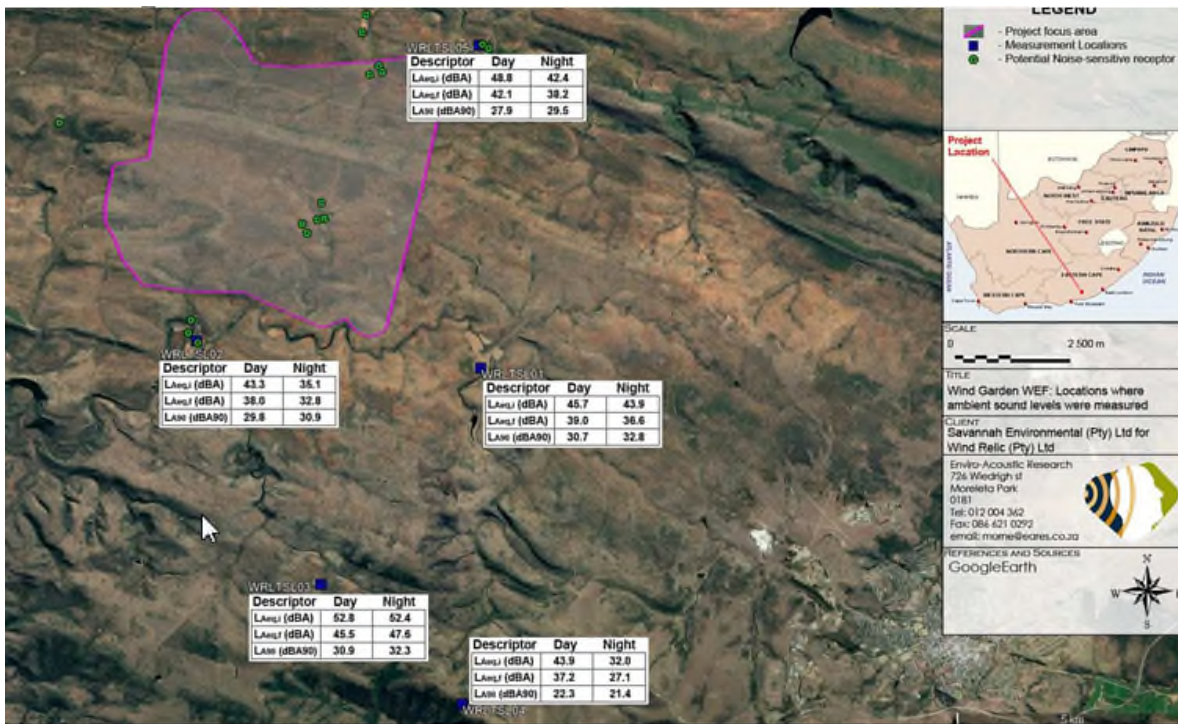
## 2.4 **Ad Para 4.2 : Ambient Sound Levels**

2.4.1 The measurement protocols are noted as being in accordance with the South African National Standard SANS 10103:2008 "*The measurement and rating of environmental noise with respect to land use, health, annoyance and to speech communication*", which is correct.

2.4.2 The measurements were conducted at five locations.

2.4.3 At none of the eight noise sensitive locations within the proposed WEF area were ambient sound levels measured, see below:





The report records residual / ambient noise measurements at five locations. There are however twenty three noise sensitive locations (as stated in the report) and thus for eighteen of them there is no measurement record of existing conditions.

2.4.4 No residual / ambient noise measurements were taken within the proposed WEF area. It is impossible to evaluate turbine noise effect on residual / ambient noise levels if none are known.

2.4.5 Thus:

- No measurements were taken within the WEF area.
- No measurements were taken at the noise sensitive locations.
- The choice of residual / ambient measurement location seems to be arbitrary and thus meaningless.

2.4.6 Of the five residual / ambient noise level measurements, four have equipment measurement lists similar to that as below:

**Table 4-1: Equipment used to gather data at WRLTSL01**

Equipment	Model	Serial no	Calibration Date
SLM	SVAN 977	36176	January 2020
Microphone	ACO 7052E	49596	January 2020
Calibrator	Quest CA-22	J 2080094	June 2020
Weather Station	WH3081PC	-	-

\* Microphone fitted with the RION WS-03 outdoor all-weather windshield.

Comment:

- i. To determine existing noise levels with just five measurements in a ~650 Hectare is not in accordance with section 5 of SANS 10103: *The measurement and rating of environmental noise with respect to annoyance and to speech communication*. Conformance with SANS 10103 is required by the regulations.
- ii. Thus these measurements are meaningless.
- iii. Note must be taken of the above:

**Table 4-1: Equipment used to gather data at WRLTSL01**

Equipment	Model	Serial no	Calibration Date
SLM	SVAN 977	36176	January 2020
Microphone	ACO 7052E	49596	January 2020
Calibrator	Quest CA-22	J 2080094	June 2020
Weather Station	WH3081PC	-	-

\* Microphone fitted with the RION WS-03 outdoor all-weather windshield.

In particular the note below the table:

- \* Microphone fitted with the RION WS-03 outdoor all-weather windshield.
- a. It is common for a sound level meter to be fitted with a weather shield if used outdoors. However, the sound level meter used is a Svantek Svan 977, made in Poland.



The above note records that the weather shield used was a Rion WS-03 which is a weather shield for a Rion sound level meter made by Rion in Japan.

A Svantek meter should have a Svantek SA 277 and SA 270 d Weather Protection and Dehumidifier.

In discussion with Joanna Werner at Svantek calibration laboratory in Poland she stated that the readings of the Svan 977 meter with a Rion weather shield could not be guaranteed as accurate and should not be accepted.

- b. Thus the reading of existing noise levels must be repeated.

## 2.5 Ad Figure 8-4

2.5.1 The above figure shows a noise contour map, as per below:

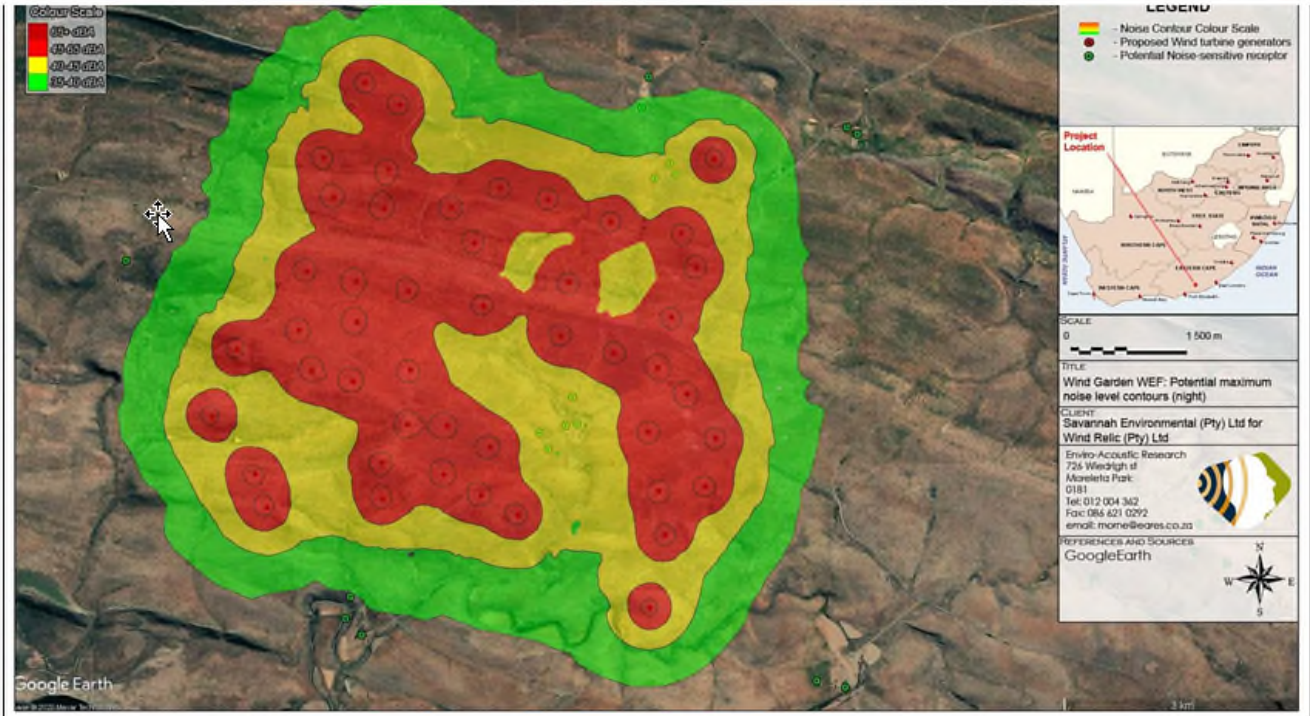
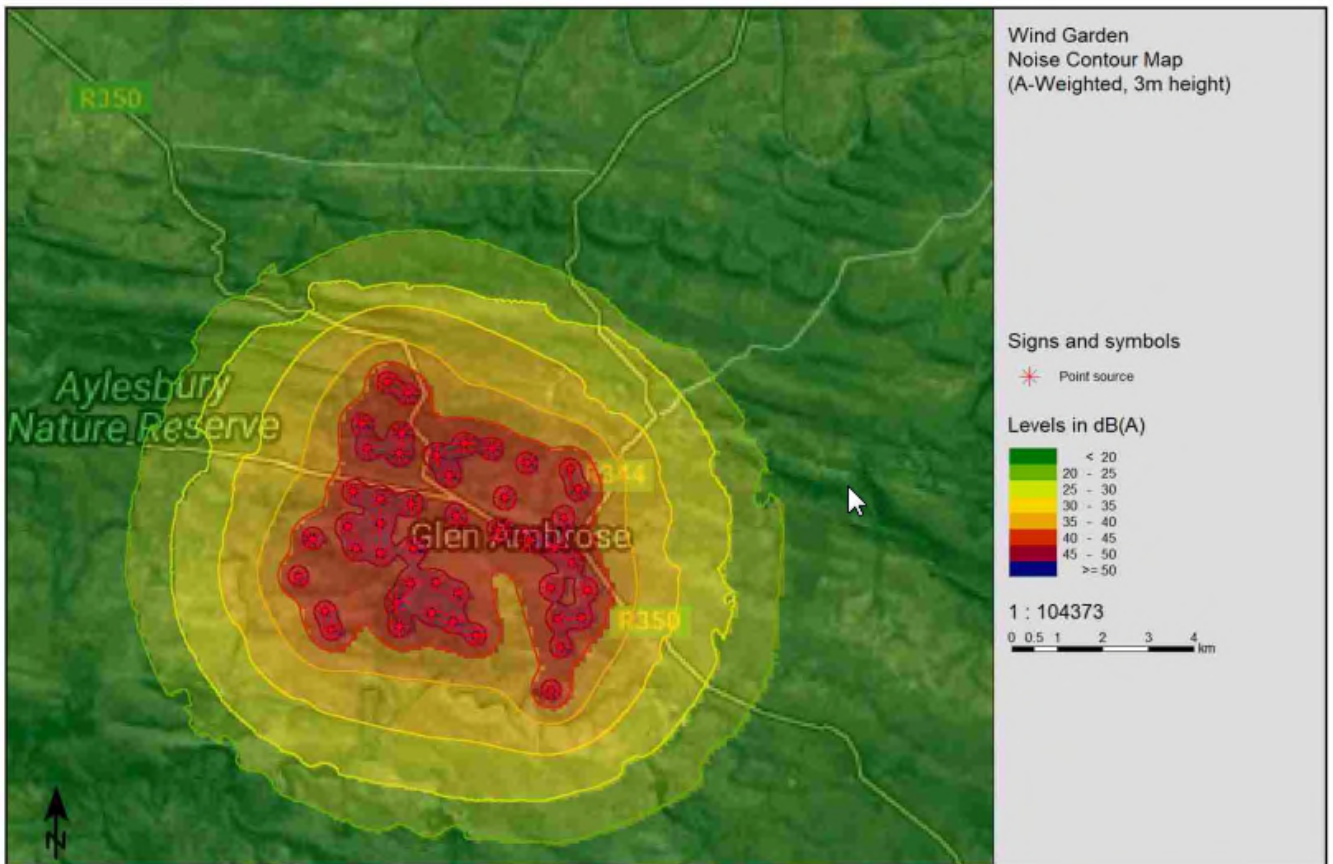


Figure 8-4: Projected maximum night-time operational noise rating levels due to operation of Wind Garden WF

2.5.2 On the following page is shown a noise contour map, produce using the German software, SoundPLAN:



## SoundPLAN Noise Contour Map for Wind Garden

2.5.2 The Figure 8.4 map and the SoundPlan map differ in many respects:

- Sound levels in the Figure 8.4 map are not the same as the SoundPlan map.
- The contour shapes differ.

2.5.3 On this basis it must be concluded that the Figure 8.4 map is not computer generated and is thus incorrect.



## 2.6 Ad. Appendix E: Photos of Measurement Locations

2.6.1 Photographs are provided of measurement locations. These are as follows:



**Photo B.1: Measurement location at WRLTSL01**



**Photo B.2: Measurement location at WRLTSL02**





**Photo B.3: Measurement location at WRLTSL03**



**Photo B.4: Measurement location at WRLTSL04**





**Photo B.5: Measurement location at WRLTSL05**

2.6.2 It is noted that :

- a. In paragraph 2.4.4 above it is noted none of the measurement locations is at a identified noise sensitive location or with in the WEF area.

In SANS 10103:2008 "*The measurement and rating of environmental noise with respect to land use, health, annoyance and to speech communication*" it specifically states that "At each measuring point, the microphone should be placed at a height of between 1,2 m and 1,5 m for general investigations, and, if practicable, at least 3,5 m away from walls, buildings and other large flat vertical surfaces." It is clear that from photographs B3 and B4 that the microphones are less than 3,5 m from "walls, buildings and other large flat vertical surfaces" and consequently these measurements are not valid.

- b. Further, to only measure near domestic dwellings and to extrapolate these to be residual / ambient levels for a 600 hectare area is clearly incorrect.

## 2.7 Conclusions

- 2.7.1 The report examines the impact of a 4.2 MW Turbine on noise levels when a 5.5 MW turbine, 30% louder, is proposed.
- 2.7.2 The report ignores impacts on other sensitive environmental receptors. The report fails to mention that the turbine placement area is located within an area which has extensive game reserves with elephants, rhino and other wildlife as well as game farms.
- 2.7.3 The report cites many regulations and standards but fails to note that the project area for the location of the Wind Garden Wind Energy Farm (WEF) falls within the Metropolitan Area of the Nelson Mandela Metropolitan Municipality (NMMM). This means that the noise pollution caused by the WEF is regulated by the NMMM Noise Control By-Law (LAN. 37 of 2010 published in PG No. 2322 of 24 March 2010) which requires measurement of environmental noise under SANS 10103:2008.
- 2.7.4 At none of the eight noise sensitive locations within the proposed WEF area were ambient sound levels measured.
- 2.7.5 The report records residual / ambient noise measurements at five noise sensitive locations. There are however twenty three noise sensitive locations (as stated in the report) and thus for eighteen of them there is no measurement record of existing conditions.
- 2.7.6 No residual / ambient noise measurements were taken within the proposed WEF area. It is impossible to evaluate turbine noise effect on residual / ambient noise levels if none are known.
- 2.7.7 The measurements are incorrect due to mismatched equipment: In discussion with Joanna Werner at Svantek calibration laboratory in Poland she stated that the

readings of the Svan 977 meter with a Rion weather shield (as was done) could not be guaranteed as accurate and should not be accepted.

2.7.8 The noise contour map and a calibrated SoundPlan map (as used by the German government ) differ in many respects:

- a. Sound levels in the noise contour map are not the same as the SoundPlan map and in some instances differ greatly.
- b. The contour shapes differ.

2.7.9 In SANS 10103:2008 "*The measurement and rating of environmental noise with respect to land use, health, annoyance and to speech communication*" it specifically states that "At each measuring point, the microphone should be placed at a height of between 1,2 m and 1,5 m for general investigations, and, if practicable, at least 3,5 m away from walls, buildings and other large flat vertical surfaces." It is clear that from photographs B3 and B4 that the microphones are less than 3,5 m from "walls, buildings and other large flat vertical surfaces" and consequently these measurements are not valid.

2.7.10 Further, to only measure residual / ambient levels domestic dwellings and to extrapolate these to be residual / ambient levels for a 600 hectare area is clearly incorrect.

*Mackenzie-Hoy*

Eng. T.E. Mackenzie Hoy PrEng Bsc (Elec)

T.E. Mackenzie-Hoy Pr. Eng. Bsc (Elec) M.S.A.I.E.E., M.S.P.E., IngP (Eur), AmASA (Director)  
Rachel Viljoen BEng (Mechatronics), M. Attwood (Adv Dip S.Eng), G. Viljoen DiplQS)



**Registered professional engineer number 840428**  
**for: Mackenzie Hoy Consulting Acoustics Engineers**

## Savannah Public Process

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**From:** Amakhala Foundation  
**Sent:** Tuesday, May 4, 2021 7:35 PM  
**To:** Savannah Public Process  
**Subject:** WIND GARDEN & FRONTEER WIND FARMS

To whom it may concern

**WIND GARDEN WIND FARM AND FRONTEER WIND FARM NEAR MAKHANDA, EASTERN CAPE PROVINCE  
(DFFE Ref.No.: 14/12/16/3/3/1/2314 and 14/12/16/3/3/1/2315 respectively)**

Jennifer Gush commenting as Director of the Amakhala Foundation which operates within the communities in and around Amakhala Game Reserve, an Indalo Protected Environment.

The Eastern Cape has become grown into a well-known wildlife tourism and safari destination over the last twenty years, providing significant levels of employment, for people with little or no skills all the way through to highly skilled ecologists and business owners. The economic activity within the areas in which game reserves occur has also drastically increased along-side this industry. The knock on effect of the wildlife tourism and safari industry to the whole economy and community development of areas around game reserves of the Eastern Cape should not be underestimated.

I am of the opinion that the development of wind farms in the Eastern Cape puts the wildlife tourism industry at a high risk of collapse. The industry has developed in an already fairly developed space, with towns and roads networks detracting from the guest experience. I am fairly certain that the visual impact of wind farms will tip the balance in favour of other wildlife destinations with our guests and tour operators closing down a whole industry which contributes greatly to the communities and economy within the Eastern Cape. The closing down of such an industry would have devastating effects on the economy and communities.

I believe that the negative impact on the safari and tourism industry will be far greater than any benefit that the wind farms will generate.

Regards

Jennifer Gush



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# BRACKKLOOF

*Farm*

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James Selwyn Brown t/a J.S Brown

To whom it may concern

RE: Wind Garden Wind Farm Proposal and the benefits of such a project in our area.

We as landowners strongly believe that the positive impact of such a proposed wind farm will be greatly beneficial not only to the local area but the Eastern Cape as a whole.

The advantages of wind energy are more apparent than the disadvantages. The main advantages include an unlimited, renewable resource (the wind itself), economic value that enables SA industry growth and creates much needed job opportunities. Land is available to construct turbines on, without effecting food security and sustainability, and it is an efficient use of land space.

The proposed wind farm will help grow the agricultural industry in our area as more resources will be available to expand our businesses and create more permanent job opportunities. Not only will it positively impact the rural areas but the town as well. Wind is recognised as a key source of renewable energy and has broad public support for the industry. It is generally accepted in the community.

We are extremely impressed with the studies done in the proposed area and cannot commend enough the persons who undertook these studies.

Some of the effective parties has lodge grievances regarding the visual aspect of such a project, but they fail to acknowledge that we had to take on large power lines running though our properties to accommodate them in the past with little to non-regards to the visual impact it holds. The visual impact on our properties will not affect us as landowners and residence and will not negatively impact our lively hood or our tourism business. From our properties the Waainek turbines are visible, and just a short drive the Bedford projects. The turbines have become part of our visual life with hardly any negative comments from the communities, clients, and towns nearby. It opens positive conversations regarding sustainability and a greener future.

Long term monitoring of the area (since 2011) makes it clear that the proposed wind farm has been correctly and effectively been studied and monitored.

Unfortunately, the game industry has been on a downwards spiral for the last couple of years and is not a viable source of income for us, nor does it contribute greatly to food security and sustainability in our area. It offers limited growth and unfortunately will not be sustainable or viable should another pandemic strike our country. Game farms not in the tourism side, but hunting will not be affected as most clients do not mind should turbines be visible. The other tourism businesses are a substantial distance away from the proposed

project and offers no help nor contributes positively to the majority of landowners businesses and the sustainability of them.

We would like to propose that the project gets involved and support the local farming community in the combating of crime and assist in security upgrades in the area. This will insure a safer area for all. ( Table Hill Conservancy Area)

I would also like to encourage the developers to get involved and support the local firefighting association (Table Hill Fire Association) in the project area. This helps to ensure that all fires that break out in the area gets extinguished as soon as possible without causing untold damage.

Should you have any queries please do not hesitate to contact us.

Kind Regards

James & Aletta Brown

Nicolene Venter  
Public Process Savannah Environmental

Per email: publicprocess@savannahsa.com

To whom it may concern,

6 May 2021

**RE: SUBMISSION ON WIND GARDEN WIND FARM AND FRONTEER WIND FARM NEAR MAKHANDA, EASTERN CAPE PROVINCE (DFFE Ref. Nos.: 14/12/16/3/3/1/2314 and 14/12/16/3/3/1/2315 respectively)**

1. I refer to the above matter and write this submission on behalf of the concerned residents of the following affected properties:
  1. 1.1. Remaining Extent of Farm Brackkloof No 183
  2. 1.2. Portion 5 of Farm Hilton No 182
  3. 1.3. Portion 8 of Farm Hilton No 182
  4. 1.4. Portion 4 of Farm Vandermerweskraal No 132
  5. 1.5. Portion 1 of Farm Thursford No 183
2. This submission is made on behalf of the approximately 40 people living on these farms who are likely to be affected by the proposed wind farm should it go ahead. Approximately 20 of the 40 people are adults and their names and contact details are recorded in the table below.

Name	ID Number	Cell Number
Nosipho Khamani		
Maziwe Nkompo		
Zwelinzima Khamani		
Nozodwa Mtombo		
Nomangesi Sali		
Mbulelo Zuzani		
Zukiswa Mtombo		
Siyabulela Khamani		
Simphiwe Mtwalo		
Nonkwenkwe Mtombo		
Nontsikelelo Khamani		
Nomalay Mtombo		
Vuyiswa Dyonashe		
Simphiwe Zilani		
Thensiwe Zono		
Nomalungelo Duda		
Bongani Solani		
Philip Stemele		
Nonkosi Khamani		
Thembinkosi Marawu		

## **Concerned parties**

3. I am a 31 year old female residing on Thursford Farm with my parents, two siblings, two nephews, and my son. My family and I have been residing on Thursford Farm since 1992 (29 years). I am currently employed as a housekeeper at the neighbouring Clifton Farm.
  4. Out of a family of eight members, all residing in one house, my sister and I are the only ones that are employed. The salary we receive from working as a housekeeper is used to look after the remaining members of our family. The only additional income my sister and I receive is from social grants, which are used to look after our children.
5. Nomalady Mtombo is a resident at Brackkloof Farm. She lives with both her parents and her two children in one house. She works as a “thorn-weed” picker. Just like me, she works at Farm to provide for her family that lives with her.

## **Loss of employment and living circumstances**

6. My sister and I are concerned that the construction and operation of the wind farms will force our employer to close the game farm business it runs at Clifton Farm. This concern is shared amongst other employees of neighbouring game farms whose businesses will be affected by the wind turbines. Many of the surrounding farms rely directly on the income generated by tourists who visit the game farms to view animals or to hunt. We believe that many tourists will not come to these farms if there are wind turbines in plain view. The tourists will choose to go to other game farms in other areas of the country where they won't see wind turbines when they are looking for and photographing animals. The construction of the wind turbines will have a direct impact on the livelihoods of our people as they will lose their jobs and primary source of income if the surrounding businesses close as a result of the wind farms.
7. Most people working in those businesses are residents of the farms where the proposed wind farms will be built. This will be a major concern for us not only because the job we have is our only source of income (apart from social grants), but because our living circumstances will be put at risk.
8. Regarding myself and those residents working at Clifton game farm, many of us were unemployed before we were given opportunities to work at Clifton Farm about two years ago. The Clifton Farm business gave many of us an opportunity to make a living and to provide for our families instead of depending on social grants. The old-age grant that our parents receive, and the child grants that we receive, are not enough to maintain our families and so our jobs are very important to us. We fear that this opportunity will now be taken away if we are retrenched because of the impact the wind farms will have on the game farm and tourism businesses.
9. Another major concern we have is that we will lose our homes if the wind farms are placed where we live. We fear that the location of the wind turbines will mean that our families will have to leave their homes and find alternative accommodation. For myself

and most of the residents living in the area, this is simply not possible. Our families have been living in our current homes for 29 years. This is where we have grown up and lived for most of our lives. If the wind turbines are situated so close to our homes, it will most likely cause damage to our property. It is also possible that the noise from the wind turbines will cause a disturbance. Even worse, we fear that we might be asked to leave our homes to make room for the wind farms.

10. My employer has looked at a map of the proposed wind farm and shown it to me. He has indicated to me that one of the proposed wind turbines will be placed extremely close to our home. I do not think I will be able to remain in my home if the turbine is placed there and do not know where we will go. As a family we all live in this area.

11. The other residents and I are worried about our parents and their safety if they had to be moved for the wind turbines. We would have nowhere to go and nowhere to live. We have been here for 29 years, my father started working on the farm then.

12. Some residents have been getting assistance from their landlords with getting water by allowing residents to use their water tanks or delivering water for them to their homes. These residents are worried that if they were moved to another area they will not get the same assistance with getting water. There is also not enough water in the area in general. If more people come to reside in this area because of the construction of the wind farms we are worried that our supply of water will be limited.

13. There are many residents living in the community that are elderly (for example, Mrs Nozodwa Mtombo who is 65 years old). They have the same worries as us but they are more serious for them because they are elderly and vulnerable. For example, the impact that construction and operations may have on their health and wellbeing could be very negative.

14. We are concerned that our children will also be disturbed by the noise from the wind farms when they need to do their homework or from the sounds from the windfarms when they want to sleep. Furthermore, our children often travel by foot to get to their transport which takes them to school. We are concerned that if there are any holes on the land due to construction, this may become a risk of harm to our children. Many of the children residing in the area are under 10 years of age, and so there is a serious concern about how safe they will be if such a large infrastructure project takes place.

### **Consent and participation**

15. The residents living on the farms and listed above are very vulnerable and worried about our future and livelihoods should the wind farms be constructed. We do not have permanent employment, meaning that we may not have income to take care of our family and children. If we are asked to leave our homes to make room for the wind farms, our families will be left homeless. Our homes are all we have.

16. Neither the concerned residents or I living on the farms have attended any meetings regarding the placing of wind turbines near our homes. Five of us did attend a public hearing in March 2021 in Grahamstown, but it did not answer our questions. I raised some of my concerns at the meeting, but there was NO response to our questions. None of us received a letter, a message or a report which tells us where these wind turbines will be placed in relation to our homes and the impact it will have on us. It is not possible for us to properly comment on

the proposed wind farm when we don't know what is being proposed and how it will affect us. We want a lot more information and transparency and honesty about how it will affect us. But we will definitely oppose the construction of the wind turbines if it means that we will be removed from our homes and if it means that we will lose our jobs. Because of these risks, we believe that no decision can be taken if there has not been any meaningful engagement with the residents that will be affected by the construction and operation of the wind farms. As of today we say NO to the windmills in our area.

17. Some of the questions we would like to know are:

17.1. What will happen with our families when the wind turbines are put up?

17.2. Will our houses be affected by construction or operation of the wind turbines?

17.3. How safe (in terms of security and disturbance) will the residents be with all the construction workers that will be coming into our area? Will our safety be guaranteed?

17.4. How far away will the wind turbines be from our homes?

17.5. Is it safe to have the wind turbines near our homes? What is the impact on our health and safety?

17.6. Who will be building the wind turbines and where will they live? How many people will come to build the windmills

17.7. As the area is a water scarce area, what water will the persons constructing and operating the wind farms use? How will the building and then the windmills affect the water we have now?

17.8. What impact will the construction have on the landscape?

17.9. Are we likely to lose our jobs which are closely linked to the nearby game farming businesses? The whole area over the years has moved to Game and game farms.

17.20 Will you guarantee and ensure all our jobs are safe and/or our salaries are not cut? Rec

18. We have heard that some of these issues may have been set out in a report published by your offices. However, we cannot be expected to understand such a report. Many of us residents will struggle to understand these complicated words and what they mean for us. We believe that someone must come and explain to us the impact of these proposed wind farms in simple language that we can all understand, and in isiXhosa. We made this point at the public hearing held at the public hearing in March 2021. That was 5 weeks ago but no one has approached us.

19. Since the proposal for the wind farms were made public, we were not, and still have not been informed, consulted or contacted by either the landowners of the farms we reside on or the company that is proposing to build the wind farms. Given the negative impact the wind farms will probably have on our livelihoods, we believe that all the families residing on the affected farms should have been informed and consulted before we were asked to comment.



20. The residents of the farms have not been asked whether they are happy with the wind farms being placed so close to their homes. The residents submit that someone should ask us before the windmills are placed near our homes. We are not happy that we have not been consulted on this.

21. We believe that the decisions to construct and operate the wind farms have a direct impact on our livelihoods and so we have a right to be involved in this process. At the very least, we ask that the details of the proposed windfarm be explained to us in isiXhosa, and there be a summary translation of the Assessment report into isiXhosa – particularly those aspects which deal with the likely impact of the proposed wind farm on our employment, our houses, and our safety. Only then we will be able to comment on the proposal in an informed manner and partake in any negotiations and decision-making processes so that our rights and concerns can be heard.

Your faithfully

**NOSIPHO KHAMANI**

**AFFIDAVIT OF FARM EMPLOYEES AND RESIDENCE**

**BRACKKLOOF FARM**

I, Simphiwe Julius Mtwalo, \_\_\_\_\_, Zukiswa Sylvia Mtombo \_\_\_\_\_ | the undersigned, as a member of a group of farm workers permanently employed by Mr James & Aletta Brown at Brackkloof Farm, hereby declare under oath as follows;

- 1) I have been made aware that my name is included in a list of farm workers in a letter of objection addressed to Savannah Environmental dated 6 May 2021.
- 2) Of the 20 workers listed in the letter 2 workers, 2 retired workers, Nozadwa Mtombo \_\_\_\_\_ Jimmy Nonkwenkwe \_\_\_\_\_ ) and 1 casual, Nomalady Mtombo \_\_\_\_\_ reside on Brackkloof Farm employed by Mr James and Aletta Brown. And 3 more permanent staff. Candice Fortuin \_\_\_\_\_ Bulelani Mhlaba \_\_\_\_\_ , Mxolisi Jongile \_\_\_\_\_
- 3) I have not given any person consent or authority to use my name or Id number in this regard and was done without my knowledge.
- 4) The said letter sets out various grievances and concerns relating to the development of the Wind Garden and Fronteer Wind Farms and the perceived negative impact on the farm workers.
- 5) The listed grievances, amongst others, include loss of employment/living conditions and lack of participation/consent in the development process.
- 6) At a meeting held with the workers on 11 May 2021, Mr James Brown and Aletta Brown informed us as follows;
  - a) None of the workers currently employed by him will lose their employment once the windfarm is completed.
  - b) All workers currently housed on the farm will continue to do so and according to their employment contracts.
  - c) Farming will continue as normal and will not be impacted on by the wind farm.
  - d) Farm workers will be continually kept abreast of progress of the wind farm by Mr James Brown and Aletta Brown.
- 7) Given the above explanation I would like to add
  - a) That information given to Savannah Environmental is incorrect and inaccurate.
  - b) That I have no objections to the proposed wind farm, as it will better our lives and the rural community around us, provide jobs and opportunities for growth.
  - c) Secure our jobs and employment for the future.



- d) That Aletta and James Brown has explained to me in isiXhosa the preposed wind farm, how it will effect our daily lives for the better, and should we have any questions that we can ask them at any time to explain or clarify.
- e) I have received a information document showing the preposed wind farm, preposed layout, project description, BA process and results and the way forward.
- f) That a field trip to nearby windfarm will be scheduled.
- g) I have signed this document out of my own free will.

Signed on 11 May 2021 at Blackleaf Farm by the following workers/residents.

Simphiwe Julius Mtwalo, 

Zukiswa Sylvia Mtombo, 

Nozadwa Mtombo 

Jimmy Nonkwenkwe 

Nomalady Mtombo 

Candice Fortuin 

Bulelani Mhlaba 

Mxolisi Jongile 

James Brown (OWNER) 

Aletta Brown (OWNER) 

**AFFIDAVIT OF FARM EMPLOYEES AND RESIDENCE**

**BRACKKLOOF FARM**

I, James Brown,  
Brackkloof Farm.

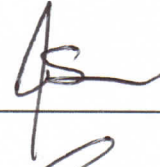
<sup>6 1</sup>  
Aletta Brown

the undersigned, as land owner of

- 1) I have been made aware that the farms name and title deeds, as well as permanent staff, casual staff and residence is included in a letter of objection addressed to Savannah Environmental dated 6 May 2021.
- 2) Of the 20 workers listed in the letter 2 permanent workers, 2 retired workers, Nozadwa Mtombo and 1 casual, Nomalady Mtombo, Jimmy Nonkwenkwe, reside on Brackkloof Farm employed by Mr James and Aletta Brown. And 3 more permanent staff. Candice Fortuin, Bulelani Mhlaba, Mxolisi Jongile
- 3) I would like to inform Savannah Environmental that information pertaining to our property have been given incorrectly and falsely.
- 4) It states that there are persons who reside on this property does so on Portion 5 of Farm Hilton No 182 – this is incorrect as no person resided on this area.
- 5) It states that there are persons who reside on the property on Portion 8 of Farm Hilton No 182 – this is incorrect as no person resides on this area.
- 6) The listed grievances, amongst others, include loss of employment/living conditions and lack of participation/consent in the development process has been address with relevant parties on the 11<sup>th</sup> of May 2021.
- 7) In paragraph 15 it is mentioned that persons living on the farms are not permanently employed. This is incorrect and we would like to state that persons residing on the farm are permanently employed by us with the exception of 2 elderly person who have retired, and one casual cleaning lady.
- 8) That our staff has informed us that they never attended a meeting with, given permission or instruction to Nosipho Khamani to represent them in this regard, or talk on their behalf.
- 9) That we are a livestock farm and not a game farm and do not get any assistance nor any benefit from nearby game farms and reserves.

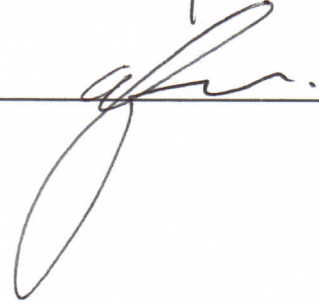
a) Signed on 11 May 2021 at Braddkloof by the following workers/residents.

James Brown (OWNER)



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Aletta Brown (OWNER)



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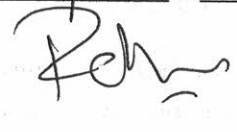








AFFIDAVIT

I, the undersigned, as a member of a group of farm workers and ex-farm workers employed by Mr Robert Dell, hereby declare under oath as follows:

1. Have been made aware that my name is included in a list of farm workers in a letter of objection addressed to Savannah Environmental dated 6 May 2021.
2. Of the 20 workers listed in the letter 12 workers reside on Mr Robert Dell's farm and are mostly employed by him.
3. The said letter sets out various grievances and concerns relating to the development of the Wind Garden and Fronteer Wind Farms and the perceived negative impact on the farm workers.
4. The listed grievances, amongst others, include loss of employment/living conditions and lack of participation/consent in the development process.
5. At a meeting held with the workers on Monday 24 May 2021, Robert Dell informed us as follows:
  - a. None of the workers currently employed by him will lose their employment due to the development of a windfarm.
  - b. There will be no change to housing due to the wind farm.
  - c. Normal farming will continue during development of the windfarm as well as on completion.
  - d. Any relevant questions regarding the windfarm will be attended to and answered.

Signed on 24/5/21 at Hounslow by the following workers/residents;

Rob Dell  Thengile Zono  
• Mbulelo ZUZANI    
Nomalungelo Duda   
Siphiso Zilani   
Zandizima Kamani   
Thembiso   
Nomangesi Sylvia Sali  
N/S Sali



**WRSA**  
WILDLIFE RANCHING SA

**Wildlife Ranching South Africa**

Reg No: 2006/010722/08 - Vat No: 4200 228 098  
Building number 9, 3 Bauhinia Street, Oxford Office Park  
Highveld Techno Park, Centurion, 0157

*Our*  
**GAME**

6th May 2021

Ms Nicolene Venter

Savannah Environmental

([publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com))

P.O. Box 148

Sunninghill

2157

Dear Ms Venter

**RE: PUBLIC COMMENTS ON SAVANNAH ENVIRONMENTAL (2021) BASIC ASSESSMENT REPORT FOR THE FRONTEER WINDFARM AND ASSOCIATED INFRASTRUCTURE, EASTERN CAPE PROVINCE.**

Kindly receive the attached document with Wildlife Ranching South Africa's comments to the Basic Assessment Report made available for review on 4 March 2021.

Please confirm in writing on receiving of this e-mail.

Kind Regards

Richard York

WRSA – CEO

Gerhard Heyneke

WRSA – Chairman

**CEO/HUB:** R York

**Chairperson/Voorsitter:** G Heyneke **Vice-chairperson/Visevoorsitter:** C Engelbrecht  
**Direkteure/Directors:** M Davey, C du Toit, P. Ernst Jr, T. Jurgens; Dr T. Lesoli;  
K Maphai; N. Mayathula; T Mogashoa; Dr P. Oberem; R Nel; LLS vd Watt



**WRSA**  
WILDLIFE RANCHING SA

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Building number 9, 3 Bauhinia Street, Oxford Office Park  
Highveld Techno Park, Centurion, 0157

*Our*  
**GAME**

## WILDLIFE RANCHING SOUTH AFRICA

Wildlife Ranching South Africa (WRSA) as an organisation represent the interests of ranchers or private landowners. These ranchers conserve and protect numerous species, whilst securing vital biodiversity habitat for some of the most endangered and iconic species of our country. With an excess of over 200 game ranchers in the Eastern Cape Province that are members of our association, we represent the view of numerous ranchers who will suffer directly as a result of these proposed windfarms.

South Africa has the largest wildlife industry in Africa and possibly the world. According to the Department of Environmental Affairs annual statistics, after the Limpopo Province, the Eastern Cape Province is the second largest provincial destination for eco-tourism and international wildlife tourist. The wildlife industry in the Eastern Cape of South Africa has grown tremendously in the last 30 years and international tourists form a very important part of this growth in the industry.

Excluding the contributions of the East Cape provincial parks and reserves, the private wildlife ranchers in the Eastern Cape account for more than **2-3 million hectares** of converted farm land dedicated to the sustainable & wise use of at least **43 indigenous game species, totalling between 1 and 1,5 million heads of game**, including everything from blue duiker to elephant, and provide protection to significant numbers of rare species such as rhino, oribi, bontebok, Cape mountain zebra and some of the most progressive 'cattle disease free' Buffalo herds in South Africa.

Tourism related activities in the Eastern Cape, safeguards at least **50 200 sustainable livelihoods** in some of the most rural areas of the province.

It is important to note that WRSA does not oppose renewable energy sources such as wind turbines. However, we object to the planned positioning of the proposed Fronteer and Wind Garden windfarms in the Makhanda area as these will have dire consequences on the wildlife and tourism industry, which is the biggest economic revenue stream for the local community in this rural area.



**CEO/HUB:** R York

**Chairperson/Voorsitter:** G Heyneke **Vice-chairperson/Visevoorsitter:** C Engelbrecht  
**Direkteure/Directors:** M Davey. C du Toit; P. Ernst Jr; T. Jurgens; Dr T. Lesoli;  
K Maphai; N. Mayathula; T Mogashoa; Dr P. Oberem; R Nel; LLS vd Watt





## SUBMISSION

- a. WRSA hereby submits our written comments.
- b. These comments are general comments requesting clarity surrounding our concerns and do not represent a scientific report.
- c. WRSA reserves the right to add, amend and alter these comments.
- d. WRSA anticipates each point made in this document to be substantially addressed and answered, such answers should be in writing and be substantiated with evidence supporting the responses provided.
- e. WRSA anticipates all comments made by our association, our members, the community and industry specialists during the public participation process to be substantially addressed and answered, such answers should also be in writing and be substantiated with evidence supporting the responses provided.

**GEO/HUB:** R York

**Chairperson/Voorsitter:** G Heyneke **Vice-chairperson/Visevoorsitter:** C Engelbrecht  
**Direkteure/Directors:** M Davey, C du Toit; P. Ernst Jr; T. Jurgens; Dr T. Lesoli;  
K Maphai; N. Mayathula; T Mogashoa; Dr P. Oberem; R Nel; LLS vd Watt



## INTRODUCTION

1. This document serves as further input in the public participation process in relation to the Basic Environmental Assessment of the proposed Frontier and Wind Garden windfarms in the Makhanda area. This document serves as comment on the impact assessment of both of these developments jointly and separately.
2. The document should be read together with the inputs made by and on behalf of the game, wildlife ranching and associated sectors and the underlying businesses on a range of online and physical public meetings. As such these inputs should be considered together as whole for and on behalf the interested and affected parties.
3. As an interested and affected party, we submit the following comments.

## DRAFT DOCUMENT

4. The socio-economic report is a Draft document and it is completely unfitting to present a report that is still a draft for public comment by interested and affected parties when the whole document could still change.

## METHODOLOGY

5. The tools to assess the primary and secondary socio-economic impacts of the proposed intervention are noted.
6. The difficulties with assessing the cumulative effects of intervention are also noted.
7. In terms of the tool to assess the secondary impacts the use of a provincial input output and/or social accounting matrix is arguably inappropriate to determine the socio-economic of the proposed project on a local level:
  - 7.1. The model used in the basic assessment is purportedly the version developed in 2006. This makes the model outdated to represent current conditions in 2021 and therefore the underlying tool to conduct the main body of the socio-economic assessment is not fit for purpose and the results cannot be accepted at face value nor any findings or recommendations based on any such findings. The report does not offer any information to the contrary.
  - 7.2. While the input output and/or social accounting matrix is presented “as is” as the tool to conduct the socio-economic impact for the proposed projects the model has not been published nor is there any proof that the model has been subjected to any peer review process, as would be an acceptable professional practice. The bone fides of the model are therefore not beyond doubt and consequently neither are the findings and recommendations that flow from the use of the specific model in the specific context.
  - 7.3. Typically using input output and/or social accounting matrix models are used to model country wide policy effects. The report offers no justification for using an economy wide policy analysis tool to conduct a socio-economic impact analysis at a very local level where particular

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projects are developed at a local level. Arguably the proposed model does not use local level data to model local level impacts and therefore the results are unlikely to be a true reflection of the local level impacts – like, for example, in the rural economy of the Makhanda district. While the projects will have provincial level impacts, they will also have more localized effects and which granularity is typically not captured in high resolution by economy wide models.

7.4. Cumulative negative effects at a local level not modelled satisfactory.

## DATA COLLECTION

8. The data collection process is noted. The specific steps of the data collection process include:
  - 8.1. Reviewing of planning documents
  - 8.2. Literature review
  - 8.3. Interviews with stakeholders
9. In terms of the review of planning documents it is noted that the review is incomplete and underrepresented, as discussed below and that robust and balanced conclusions cannot be made from the review in its current form.
10. In terms of the literature review it is noted that the literature review is insufficiently nuanced, as discussed below, and that a range of different conclusions could be reached with a more nuanced consideration of the literature.
11. Overall, the data collection process appears incomplete at worst and insufficient at best when all of the elements thereof are considered collectively

## VISUALLY AFFECTED STUDY AREA

12. The depiction of the visually affected study area is noted.
13. The total extent (in hectares and square kilometres) of each of the affected areas, per category, should, however be explicitly stated in each of the individual reports to provide a reader with a concrete extent of the impact. This impact is currently not clear.
14. A distinction of both the day and night views are required with all towers fully lit, to demonstrate the total extent of both these modes. This impact is currently not clear.
15. It is uncertain whether any ground truthing of the depiction has been conducted to ensure an accurate and true reflection of the visually affected area. Consultation with other interested and affected landowners suggest significant discrepancies in the current assumptions regarding visual impact with landowners able to clearly observe other windfarms from their properties that are supposedly not visible. In this regard the visually affected study area cannot be accepted as is, specifically if it is not substantively (and not theoretically) confirmed.



## POLICY AND PLANNING ENVIRONMENT AND NEEDS AND DESIRABILITY

16. Review of policy and planning environment is incomplete and under representative:
  - 16.1. The basic assessment report covers a range of policies related to economic development, state of the economy and specifically renewable energy at the national, regional, provincial and local level. The overview of the range of policies are used as a platform to justify and motivate for the establishment of the projects in terms of the needs and desirability of the proposed projects.
  - 16.2. The report is, however, completely silent or vague on a range of policies and strategies related to the natural environment, bio-economy, tourism, wildlife economy, natural corridor development, biodiversity preservation, etc at the international, national provincial and local level that are highly relevant to the specific project and context. The complete absence or under-emphasis of any reference to a range of policies and strategies in this domain is highly irregular and unthinkable in the context of an independent report that should consider the matter at hand holistically and fairly. As with the policies and strategies that are in the report and which are used to motivate for the development of the projects, a consideration of the bouquet of environmental policies and strategies that are not in the report will likely support the undesirability of the proposed projects.
  - 16.3. This document purposefully does not list the bouquet of policies and strategies related to the natural environment, bio-economy, tourism, wildlife economy, natural corridor development, biodiversity preservation, etc at the international, national provincial and local level that are very relevant to the project because this is the work that should have been done in the assessment. In this regard the assessment is flawed and one-sided.
  - 16.4. At the very least all of the policies and strategies that are relevant to the specific context must be considered in the report to provide a balanced view of the question at hand. It is our view that the need and desirability of the projects are, at best, inconclusive in the policy and strategic context having regard for the range of policies that exist at the local, provincial, national and international level.

## SOCIO- ECONOMIC PROFILE OF THE STUDY AREA

### Municipal profile

17. The socio-economic profile does not record the contribution of the general tourism sector, specifically, to the economic profile of the study area. Presumably this contribution is lumped with another sector and therefore hidden from view. It is, however, critical in the context of the specific project to consider the contribution of tourism to the economy because of the nexus between nature-based tourism and recreation in the localities, a pristine natural environment and the visual impact of the proposed projects. It is a significant flaw of the assessment if the contribution of the tourism sector, in its widest sense, is not visible.



18. In the specific context of the nature-based value chain the contribution of whole value chains from primary, secondary and tertiary sectors is not considered or depicted and therefore the whole value chain including activities like game ranches and reserves, hospitality institutions, hunting outfitters, game capture and translocation, game breeding, taxidermies, tour operators, butcheries, transport, veterinary services, goods and services into and from the value chain, are not considered in the economic profile as an interdependent grouping of economic activities. Disregarding the interdependent nature of these nature-based value chains is problematic in assessing the economic impact of the proposed projects because the full extent of the impact on the value chain is not considered and the explosive effects that would develop on the whole value chain remains hidden. Interdependency in the value chain and the rippling effects into the value chain must therefore be considered to provide a balanced view of the economic contribution of the whole value chain.
19. It is improper, in an independent report, for the contribution of the electricity, gas and water sectors to be the only highlighted sector in their tabular depiction.

#### Local profile

20. The profile the local area is noted. The source(s) of this profile is, however, uncertain and arguably incomplete or misleading.
21. Whereas the predominant land-use in the local area is identified as agriculture the basic assessment does not mention that the local area is extensively surrounded by a mosaic of protected and conservation areas over a large swathe of the area between the Great Fish River Reserve in the east and the Addo Elephant National Park in the west covering an area of almost 400,000 ha of land attributable to the bio-diversity economy and land-use (Source: Albany Biodiversity Corridor Spatial Assessment)
22. The basic assessment makes no mention of the very prominent bio-diversity economy, nature-based land-use in the immediate vicinity of the proposed project sites and only seems to consider the properties themselves. The impact of the proposed development on the local and regional bio-diversity economy, nature-based land-uses should not be disregarded in assessing the local profile. This land-use and the features of the regional nature thereof should be a very prominent consideration in the assessment of the projects and their appropriateness in the specific landscape.
23. In the context of the game ranching sector it is also specifically noted that a very high density of game ranches and game reserves are located in the Makhanda region. These businesses depend on 1.) trophy hunting, 2.) local hunting, and 3.) eco-tourism to exist (Source: An assessment of the economic, social and conservation value of the wildlife ranching industry and its potential to support the green economy in South Africa). The very extensive wildlife-based enterprises in the region of the proposed projects are also not mentioned and the basic assessment which is a very significant shortcoming of the report. As noted herein and as widely accepted such businesses depend on a pristine environment and natural landscape to offer an authentic experience for 1.) trophy hunting, 2.) local hunting, and 3.) eco-tourism and





consequently their prominence in the particular landscape cannot be disregarded or be made irrelevant to the specific windfarm developments.

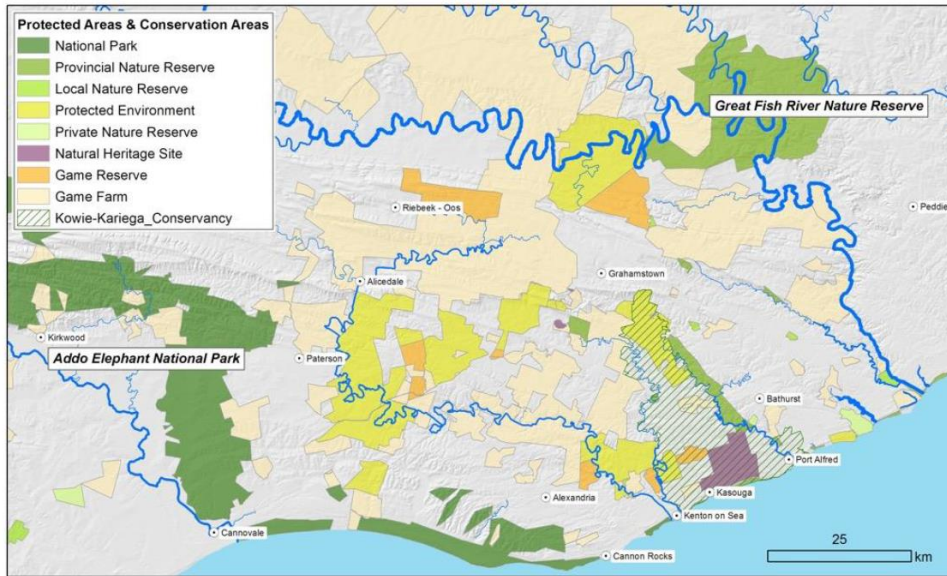


Figure 1 – Protected and conservation areas in the Albany Biodiversity Corridor

SOURCE: Albany Biodiversity Corridor Spatial Assessment

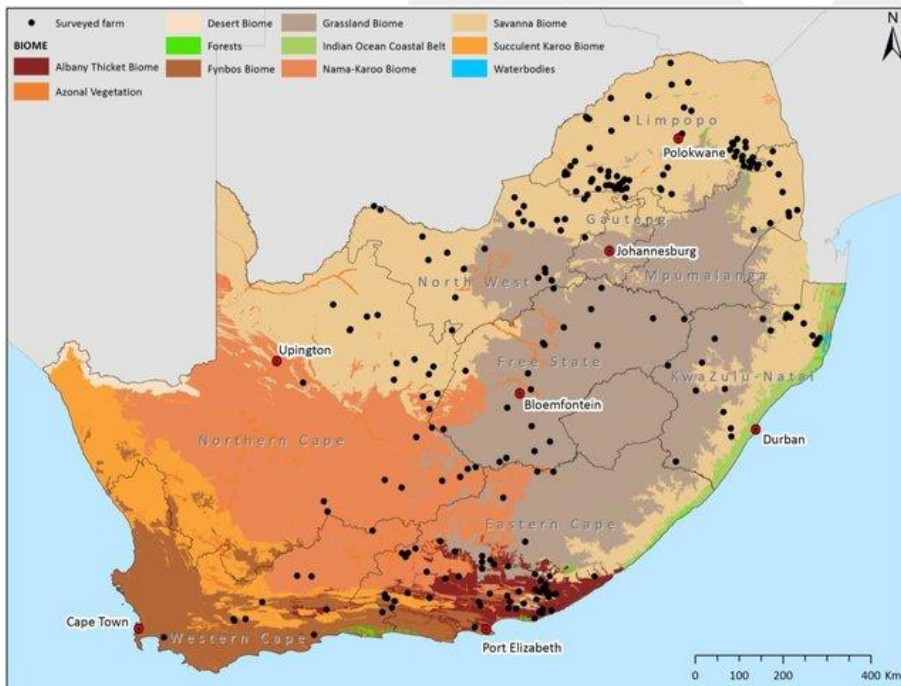


Figure 2 – Distribution of surveyed wildlife ranches across South Africa (n=251)

SOURCE: An assessment of the economic, social and conservation value of the wildlife ranching industry and its potential to support the green economy in South Africa

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## IMPACT ASSESSMENT ASSUMPTIONS

24. The number of employment opportunities that are projected should be split into high, medium, and low skilled categories for both the construction and operational phases. This is necessary to demonstrate the actual impact on the local employment situation. Moreover, the basic assessment only assumes that there will be a creation of employment opportunities as a result of the projects and that there will be no destruction of employment opportunities. Not considering the employment losses is a flaw in even-handedly weighing the impacts of the proposed project.
25. The actual wages and salaries for individual employment opportunities should be revealed to substantiate the costs linked to the employment opportunities.
26. The fact the refurbishment of the plant is foreseen after the initial period should be factored into the overall assessment of the duration of the project because the facility is for all practical purposes expected to be a permanent installation and the many of the associated impacts can be considered permanent, irreversible impacts.

## POTENTIAL ECONOMIC IMPACTS

27. Refer to the shortcomings in the methodology noted earlier, especially in depicting the impacts at local and sub-local levels
28. There are a range of businesses that will suffer negative direct and indirect impacts as a result of the development of the proposed projects.
29. No consideration of the cumulative economic effects is noted in the economic impact assessment. Arguably the cumulative effect is significant and should not be ignored or side-stepped. As noted earlier a range of nature-based businesses operate in the general region of Makhanda and the proposed area of development. The
30. The economic impact assessment is void of any assessment of the sunk costs that have been invested in a range of businesses in the bio-diversity economy and nature-based land-use enterprises. These sunk costs to develop the particular nature-based enterprises are also investments that have been made into the local economy in the past and which are endangered by the development of installations that are detrimental to the operation of such businesses. The basic assessment does not quantify the consequences of likely disinvestment and negative economic fall-out in this whole segment of businesses as a result of the development of the projects due the windfarm development. This is a particularly important shortcoming of the current basic assessment, particularly because many of the present nature-based business in the whole value chain are sustainable, employment creating enterprises in the rural economy of the area. The risk that the proposed projects pose to these enterprises and their value chains is disregarded and therefore underplays the possible negative consequences of the development of the windfarms and overplays the alleged positive impacts. This is not a balanced consideration of the matter at hand.



31. Beyond the economic effects there is also no consideration of the conservation externalities that are created by enterprises in the nature-based value chain. It is precisely because the nature-based land use and accompanying enterprises are sustainable that there is a positive conservation outcome. If the sustainability of these nature-based enterprises is negatively affected by the development of the windfarm projects the conservation gains made by these enterprises will be lost due to disinvestment from the land-use. This important conservation externality is also not considered in detail, especially in terms of the linkage to the economics of the specific land-use. It is, however, argued that this is also an important consideration of the impact of the projects, if they were to be developed.
32. It should also be noted that the negative impacts of disinvestment and job losses in nature-based business will fall on the more vulnerable members of society that can least afford such developments.

#### POTENTIAL TOURISM IMPACTS

33. The literature review in relation to the potential tourism impacts is insufficiently nuanced to effectively reflect the gradation of impacts of windfarm development in the literature.
  - 33.1. The report relies on a range of literature of mainly international research that consider a range of impacts and perceptions about the establishment of windfarms.
  - 33.2. The report generally concludes that international literature indicates that there is not a generally negative impact of windfarm development on, amongst others, tourism, tourism businesses, property prices, etc. If there is, however, any impact it is considered to be negligible. On this basis and with limited interviews the basic assessment concludes that the proposed windfarm projects are not expected to generate negative externalities for the tourism sector in their vicinity and that any concerns or objections in this regard are unfounded.
  - 33.3. However, the approach in the basic assessment lacks nuance to present a balanced view of the impacts of windfarms on tourism in the literature. The specific elements thereof are:
    - 33.3.1. The current approach used in the basic assessment report considers the impacts on the tourism sector in very broad terms and does not account for the local context of the specific projects. Some literature specifically states that location, design and context matter in the impact of windfarm development on their surroundings. In assessing the literature, the basic assessment has not been sensitive to the local context and location. The basic assessment transposes international literature on the local context without any qualification of the appropriateness thereof in addressing the local question. In this regard it is questionable whether the international literature on the topic is sufficiently authoritative to make local conclusions, especially when the context is vastly different.
    - 33.3.2. The case in point in terms of reading the literature in a nuanced way is that none of the international literature assesses the impact of windfarm development on a sector that offers an African wilderness experience where the main features of the experience centre around an authentic African wilderness setting and an experience as free as possible of





anthropogenic interference. Arguably tourist travel to destinations that offer them what cannot be experienced elsewhere or what no longer exists elsewhere.

- 33.3.3. A further example of the need for nuance in considering the literature is that international literature that specifically focusses on the impact of windfarms and similar installations on the tourism sector in a wilderness context is very much conclusive that windfarm development has a negative impact on the wilderness experience and that natural scenic areas as well as recreational areas are not suitable to the development of windfarms.
- 33.3.4. Literature also confirms that a number of sensory impacts of windfarms might negatively affect tourism and recreational activities in the areas that surround these installations. The literature specifically notes that if tourists have a negative experience of the nature-based experience they are likely to stop visiting venues in the particular area. If there is a decline in tourists visiting an area it will unavoidably result in economic losses, specifically for the nature-based enterprises that depend on the quality of the natural landscape and experience as their unique selling points and proposition to their clients.
- 33.3.5. The general area in the area of Makhanda and the Sarah Baartman District Municipality hosts a very high concentration of nature based economic activities including provincial nature reserves, local nature reserves, protected environments, private nature reserves, game reserves and game farms all of which depend on the relative wilderness features and pristine landscapes that can be offered. In this regard it is argued that the basic assessment should have considered this nuance and specific local context in the reading and portrayal of the literature on the topic and in the conclusions reached in this regard.
34. This document purposefully does not list the literature noted above because this is the work that should have been done in the assessment.
35. The specific South African case studies used to assess the tourist impact in the case of the specific are completely inappropriate and no conclusions or recommendations can be drawn from these interviews. None of the respondents represent a nature-based enterprise like a game ranch, protected area, private game reserve, hunting farm and therefore the outcomes of these interviews cannot be interpreted as if for nature-based enterprises. This flawed methodology in assessing local impact on nature-based enterprises and the fact that no nature-based enterprises were consulted discredits the conclusions and recommendations of the basic assessment in this specific regard.
36. In terms of the section that considers local business performance due the windfarms and visitors to the establishments it is argued that the feedback from these respondents do not carry any weight and cannot be considered at all as an accurate reflection of the impact on nature-based businesses like game farms, game reserves, hunting farms, eco-tourism farms because none of these respondents operate such business that rely on a pristine environment as the basis for their unique offering. It is dishonest and malicious to make use of the views of respondents that are in no way able to provide an relevant opinion to project the impact on the range of nature-based businesses that will be affected by the development of the windfarms.
37. The veracity of the study by Terblanche (2020) and its conclusions is disputed since it is merely an impact assessment for the Albany Wind Energy Facility and it is not a peer reviewed,



academic study published in an academic journal. The use of this report is wholly inappropriate to substantiate that windfarms do not have an impact on game farms.

38. Based on discussions in one of the public participation hearings we also have it on good authority that the specific reference to the windfarms not having any impact on the specific operation of game farms in the area has been misconstrued and applied completely out of context. One of the owners or operators of the one of these game farms confirmed that they had been questioned about the impact of windfarms more than 130km away from their game farm operations. Clearly it is a nonsensical query to make about the impact of windfarms on game farm or reserve operations where these are so far from each other. It is also absurd to surmise from this information that windfarm development has no impact on game farm operations at all. Arguably the whole section that addresses this issue in the basic assessment report should be withdrawn since there is no evidence in the sections to support the assertions and the ways that these assertions have been arrived at are unfounded and unprofessional.
39. The section that describes the losses due to the windfarm development is tainted due to the reliance on a section of the report that is unjustifiable in terms of the impact of windfarms on the game farms and windfarms.
40. The assertion that biltong hunters primarily hunt for meat and are not demanding in terms of their environment is arguably an unfounded opinion by the authors of the report. Literature notes that the Eastern Cape is a prime destination for South African hunters and that experiencing nature, contributing to conservation and teaching others about nature are amongst the top three priorities for South African hunters in terms of hunting. It is therefore untrue, as stated in the basic assessment, that South African hunters are not concerned about the environment when hunting. The ambiance and experience of a natural environment is, in actual fact, a significant priority for hunters and as such South African hunters have similar environmental requirements to eco-tourist and international hunters.

#### POTENTIAL PROPERTY VALUES IMPACTS

41. Considering the assessment of the potential impact on property values the analysis of residential property values is arguably a moot exercise because the development of the proposed windfarms is not near urban residential areas.
42. The impact of windfarms on the attractiveness of the properties for the development of game farms, game reserves and similar types of properties is noted in this section. The agents rebut the assertions in the basic assessment that windfarm developments have no impact on nature-based properties like game farms. It should be emphasized that agents report that in locations like Cookhouse where windfarms have been established there were difficulties in securing investors for tourism in game properties. This view of actual market conditions in localities where windfarms have been developed clearly contradicts the assertions made in the basic assessment report that there is no such impact on nature-based properties and land uses. Practically speaking windfarms have an impact on nature-based properties and investors' willingness to be invested in such properties like game ranches, game reserves, eco-tourism

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properties, etc. It would also follow from this deduction that properties in the general area of windfarms would only be suitable for traditional agricultural purposes, like livestock farming not particularly for nature-based land uses. This deduction is important considering the historical development of game ranching and nature-based properties where livestock properties were transformed to nature-based properties because of the unprofitability tendency of livestock in these areas.

## INTERVIEWS WITH STAKEHOLDERS

43. No substantiation provided that the number of stakeholders that were consulted are statistically representative of the population to ensure that robust conclusions can be made from the interviews.
44. In the alternative to a statistically robust number of interviews, as above, no substantiation is provided of the bone fides of the stakeholders that were actually interviewed in relation to the specific matter at hand is provided either.
45. It is also very clear that a number of stakeholders have not been consulted in the process of the development of the basic assessment report. The list of stakeholders that were actually consulted has not been found in the pack. However, a reasonable consultation process would have consulted local and provincial organizations representing farmers, game ranchers, professional hunters, local and international hunters, taxidermy operations, tour operators, eco-tourism businesses, farm workers, staff working in the hospitality sector on nature-based properties, civil society, the local business chamber, etc.
46. Arguably the range and depth of consultation in terms of developing a robust and balanced socio-economic assessment of the project is limited having regard for those stakeholders that were consulted and those that were not. The extent and weight of the consultations completed in the basic assessment are therefore constrained and arguably very little can be taken from this process.

## IMPACT ASSESSMENT MODEL AND ASSUMPTIONS

47. The impact assessment model is unsuitable to demonstrate the true impacts as reported in the document and the and conclusions and recommendations based on the model are not fit for purpose.
  - 47.1. The assignment of each of the particular values in the impact assessment model is arbitrary and at the full discretion of the author of the report. Generally, there is no absolute quantification of the each of variables to justify the choice of scoring at all. The model is therefore, at best, a view of the author of the report.
  - 47.2. The consequence is that, for example, the large impacts are camouflaged which, in turn, can result in a very large misrepresentation of the actual impacts. See table and graph below that illustrate the principle and show the difference between using categories versus actual impacts.



Table 1 – Calculation of changes in impact per factor category or actual impact

Impact factor category	1	2	3	4	5	Overall change
		R100 000,00	R1 000 000,00	R10 000 000,00	R100 000 000,00	400%
Actual impact	R10 000,00	000,00	000,00	000,00	000,00	999900%
Change in impact factor category		100%	50%	33%	25%	
Change in actual impact		900%	900%	900%	900%	

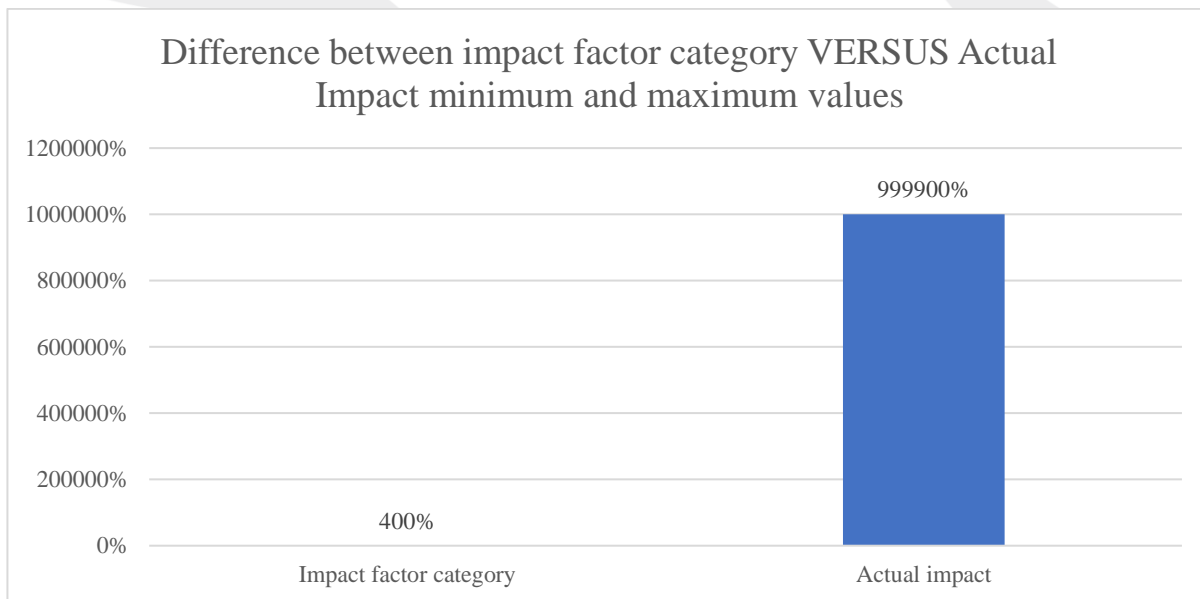


Figure 3 – Difference between two approaches of presenting impacts

- 47.3. The probabilities used in the proposed model also seem arbitrary and in the discretion of the authors of the reports. There is no supporting evidence offered to substantiate the probabilities that are employed in the model. In this regard the probabilities can only be considered as subjective and any outcomes, conclusions and recommendations generated with these probabilities are, at best, also subjective. Moreover, while these subjective probabilities might be the view of an expert such an expert is not exempted from substantiating a particular view.
- 47.4. The probability distributions for each of the variables used the impact model are not expressly noted and it is assumed that these distributions are not known. In opining on probabilities in the impact it is arguably important for the report to consider and substantiate the underlying probability distribution for each of the variables. In the absence of any consideration of the probability distribution any opinion about general probabilities in an impact framework is at risk of being substantially flawed. The current report does not consider the probability distribution of each of the relevant variables and therefore any opinion about the probabilities in this context are risky and may be an inaccurate representation of the actual probabilities. Any conclusions or recommendations that are borne from these probabilities will suffer the same shortcomings.

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- 47.5. The equal weighting of the factors under consideration is also not justified. The current proposition is that, for example, skills development weighs the same in the model as the impact on the tourism sector. Logically this weighting is not a true reflection of the gravitas of these variables by themselves in the context of their socio-economic impact. Practically this arrangement is an inaccurate representation of the true structure of the impacts which, in turn results in an unbalanced and misrepresentation of the impact that then leads to misinformed conclusions and recommendations about the socio-economic impacts.
- 47.6. Considering the comments, it is argued that the impact assessment model should be reworked given the range of comments and then presented again in an improved format for further consideration.
- 47.7. Whereas the specific impact model approach might be argued as 'best practice' it is still not necessarily appropriate, and a number of shortcomings exist in the approach. These shortcomings are not noted in the report in the framework is presented as robust. However, these shortcomings, if not dealt methodically and appropriately, may well flaw the analysis completely and result in dubious conclusions and recommendations.
- 47.8. This comment notes these flaws and shortcomings in the impact assessment approach and the consequences thereof. The comment does not attempt to resolve these issues on behalf of those tasked to undertake the independent assessment.

## CONCLUSION

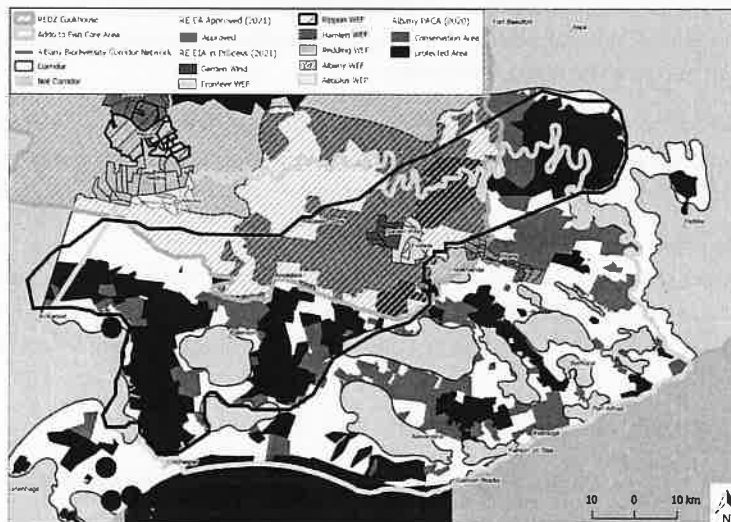
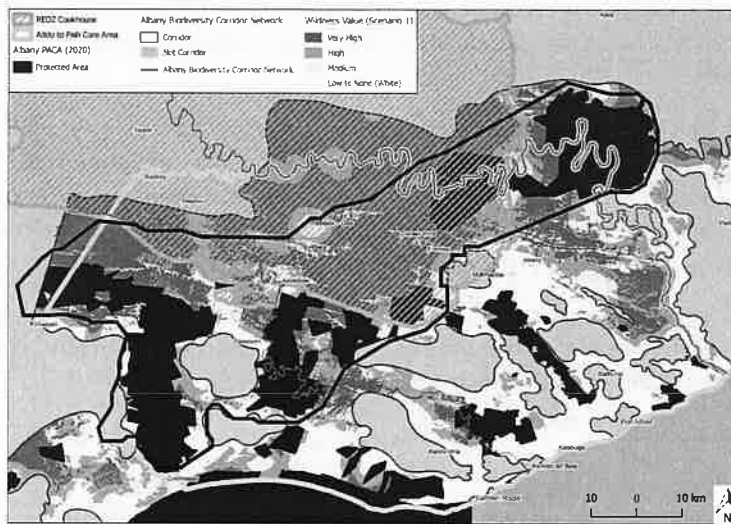
48. As alluded to in our introduction we object to the positioning of these wind farms, as the development of these wind farms will have a devastating effects on the local tourism and wildlife industry and jeopardise the main economic income of vital habitat for numerous endangered and critically endangered species.
49. We anticipate all our concerns listed in this document to be substantially addressed and systematically answered. We also anticipate that our comments raised on the public participation process will also be addressed and substantially answered.



## Letter submitted by Mr Rob Gradwell 07 May 2021

We are commenting on the Wind Garden Wind Farm and Fronteer Wind Farm (DFFE Ref.No.:14/12/16/3/3/1/2314 and 14/12/16/3/3/1/2315 respectively) as a concerned landowner, protected area manager and nature and wildlife tourism operator as well as a member of the larger Indalo Protected Environment which has experienced wind energy development directly and these comments are borne from first-hand experience.

Indalo is working to expand through further amalgamation of southern, central and northern nodes into large agglomerations of private reserves (>50 000Ha) in central area, and public private partnerships with Addo National Park and Great Fish Provincial Reserves in the south and north respectively with common traversing agreements and unified conservation management as part of the so-called Albany Mega-Reserve (also referred to as Albany Biodiversity Corridor or Addo to Great Fish Corridor as set out in below figures).



## 1 HISTORY / BACKGROUND

Lalibela was formed by the amalgamation of land previously used for stock farming and substantial effort was made to remove human-made structures including fencing and powerlines and further to rehabilitate disturbed areas to return the landscape to a natural state.

Like the other Indalo reserves (and many others in South Africa and in Africa in general); Lalibela focusses on nature and wildlife tourism that relies on the wilderness character of the reserve and surrounding area. Lalibela is managed as a formal protected area (as dictated by the Indalo Protected Area Management Plan) not only to conserve wildlife and biodiversity but also its wilderness character and its natural untrammelled state which as forms the basis for visitors to experience.

Again, like other Indalo reserves Lalibela is looking to expand its area under management and is working actively to link up with neighbouring Shamwari and Pumba reserves to form one of the protected area clusters toward the development of the larger Albany Mega-Reserve (also referred to as Albany Corridor).

Through nature and wildlife tourism biodiversity stewardship Lalibela has made a substantial contribution to the conservation of both black rhino and white rhino and protection of landscapes of ecological importance along with contributions to numerous other objectives as set out in the Indalo Protected Area Management Plan. The plan requires each reserve to secure the required financial resources to ensure achievement of the protected area management objectives.

These resources are derived from nature and wildlife tourism which is dependent on a natural environment largely free from the structures and signs of modern civilisation (often from which they come to get away) and the impact of which is not considered in the WEF BARs.

## 2 TOURISM SERVICES

Lalibela offers an African safari experience, and an increasingly rare wilderness experience of being in the bush and experiencing unspoilt scenery characterised by a diversity of landscapes within which to appreciate wildlife and unique vegetation of different biomes i.e. a wildlife experience in a natural setting (an experience of natural places, and interaction with nature and wildlife that illicit various emotional responses overall increase well-being)

We offer accommodation in three lodges each located to be in a scenic setting and offer guest game drives and views on upland plains, ravines, over valleys, into kloofs, and with vistas looking over high ground and more distant mountains with little if any sign of man-made infrastructure (with a few very notable exceptions).

Furthermore, lodges have been sited so as to offer a scenic location with vistas devoid of intrusion by human-made structures and other disturbance. We have taken great effort to use natural materials sourced from the site in the lodge construction and to offer guest a glimpse of a part of South Africa's unspoilt beauty.

## 3 IMPACT OF WIND FARM DEVELOPMENT

Nature and wildlife tourism is travel for the purpose of enjoying undeveloped natural areas or wildlife. An important component of an African wilderness experience or safari as many foreign tourists would refer the experience as is being in the bush and experiencing the wilderness and the absence of man-made structures such as modern buildings, roads, telephone lines, electricity pylons, and wild turbines specifically due to their size and intrusiveness.

Wind turbines of the Waainek facility have significantly impacted Lalibela's Kichaka lodge from where the turbines are partly visible and further impacts our visitor experience on game drives that cross the reserve's highland plateau grassland where turbines now intrude the skyline and at night the pulsing aviation warning lights dominate a part of the landscape. Views from Kichaka lodge look straight over a water hole upslope onto three turbines in the distance which guests have made numerous negative remarks about the aviation lights at night. Although the impact to Kichaka lodge is partially ameliorated by the rich landscape scenery during daylight hours the turbine lights is a significant intrusion in the night and have drawn comment from visitors to the extent that we be implementing special lighting around the lodge and on the water hole so as to distract from the turbine light intrusion.

We note with utmost concern the statements in the Wind Garden and Fronteer SIAs that references what is purported to be published literature in the form of "Terblanche (2020)" but which on review of reference is given as "*Terblanche, M. 2020. Socio-economic Impact Assessment Report: Proposed construction of the Albany Wind Energy Facility,*" when this is in fact a Draft Socio-economic Impact Assessment Report and which is littered with falsehoods including making false representation with respect to statements by Pumba Reserve manager.

The Wind Garden and Fronteer SIAs state that :

*"All tourism product owners, who were engaged with during the interviews, stated that they felt there was no impact from the wind farms on their business performance. Additionally, no complaints about the nearby wind farms were received by the owners from customers. Interviewed product owners further noted that the initial landscape change created a 'visual shock' but, notably the community has come to accept the changes to the landscape. ... Additionally, it has been noted in a study performed by Terblanche (2020) that the game farm owners in and around the Cookhouse and Waainek wind farms (located near Cookhouse and Makhanda in the Eastern Cape) had no complaints from guests and have noted no changes to performance of their game farms as a result of the presence of the wind farms. The reason stated for this was that overseas visitors are used to the sight of wind farms and were unlikely to be negatively impacted by their presence".*

AND

*"Terblanche (2020) further indicated that three game farms (including Amakhala) unsuccessfully appealed the Environmental Authorisation of Waainek Wind Farm in 2011 but, since wind farm operation have reported no effects on their eco-tourism and game/hunting business."*

We interpret the statements to imply that the Waainek WEF has no effect on eco-tourism in the area as "*three game farms (including Amakhala) unsuccessfully appealed the Environmental Authorisation of Waainek Wind Farm in 2011*". This is misleading as it fails to qualify that the Waainek Wind Farm application proposed for 27 Turbines which was eventually reduced to 8 Turbines after the appeal.

We are gravely concerned about the what appears to be cherry picking in both the VIA and SIA where a of false statements and a fallacy incomplete evidence is propagated so as to seemingly confirm a particular position with respect to impact to nature and wildlife tourism while ignoring evidence and data that may contradict that position which Lalibela along with Indalo members have first-hand experience of and which we take exception to.



Indalo has retained experts to advise on the Wind Garden Wind Farm and Fronteer Wind Farm BAs and specifically fundamental problems with the Socio-economic Impact Assessment (over and above what has been set out above already), Visual Impact Assessment, Noise Impact Assessment Avifaunal and Ecological Impact Assessments and will make comprehensive comments.

#### 4 OBJECTION

Although Indalo strongly supports all sustainable renewable energy development, we object to any development that will prevent the greater Indalo to develop as part of the Albany Mega-Reserve and to take its rightful place as a world class African nature and wildlife destination and curtail or intrude potential protected area expansion through partnership with Addo and Great Fish Provincial reserves.

We herewith object to the Wind Garden and Fronteer WEFs BARs as they are materially deficient and various omissions beguiles the assessment to find the proposed development to be acceptable when in fact it is fatally flawed.