

22 April 2022

To whom it may concern.

SUBJECT: CHANGE OF WIND GARDEN AND FRONTEER TURBINE LOCATIONS, FRONTEER AND WIND GARDEN

Dear Sir / Madam,

The Biodiversity Company was requested to comment on the affect that a change of wind turbine locations will have on the outcomes of existing agricultural compliance statements completed in 2020 for the Wind Garden and Fronteer developments. Figure 1 illustrates the comparison between those wind turbines initially proposed versus what is currently proposed (amended locations). A final optimised layout of the wind farms has been produced which has reduced the number of turbines from 38 down to 19 for Fronteer and 47 down to 23 for Wind Garden. The turbines proposed to be used will also be slightly smaller having a hub height of 115m instead of the originally proposed 120m. The rotor diameter will remain at 150m, but with a reduction in blade tip height from 200m to 190m. The change would also necessarily result in a reduction in the extent of turbine access roads and associated infrastructure. The said revision to the layout was implemented in order to address outstanding concerns from I&APs.

The majority of the initial proposed wind turbine locations were located in Very Low-Low sensitivity with only a few turbines located in Moderate sensitivity. In the optimised layout majority of the turbines that were removed from the project were located in areas of Very-Low Sensitivity and majority of the turbines left (i.e. forming part of the optimised layout) are located in Moderate sensitivity. No new sensitivities were triggered (see Figure 2). Regardless of the fact that higher sensitivity land potential resources will be affected than initially thought, it is the specialist's opinion that the final impact statement and impact ratings will not change. The impact statement is as follows;

It is the specialist's opinion that the baseline findings concur with the land capabilities identified by means of the DAFF (2017) desktop findings in regard to land capability sensitivities. No "High" land capability sensitivities were identified within proximity to any of the proposed activities. Considering the lack of sensitivity and the measures put in place in regard to stormwater management and erosion control, it is the specialist's opinion that all activities will have an acceptable impact on agricultural productivity. Furthermore, no measures in regard to moving components in their micro-setting were required to avoid or minimise fragmentation and disturbances of agricultural activities.

Therefore, it is the specialist's opinion that the proposed activities may proceed as have been planned without the concern of loss of high sensitivity land capabilities or agricultural productivity.

This impact statement is still applicable, due to the fact that no "High" sensitivity resources will be impacted by the optimised layout. The change in wind turbine locations will therefore not affect the outcome of the project in relation to impacts to land potential resources and may therefore still be favourably considered.

Regards,



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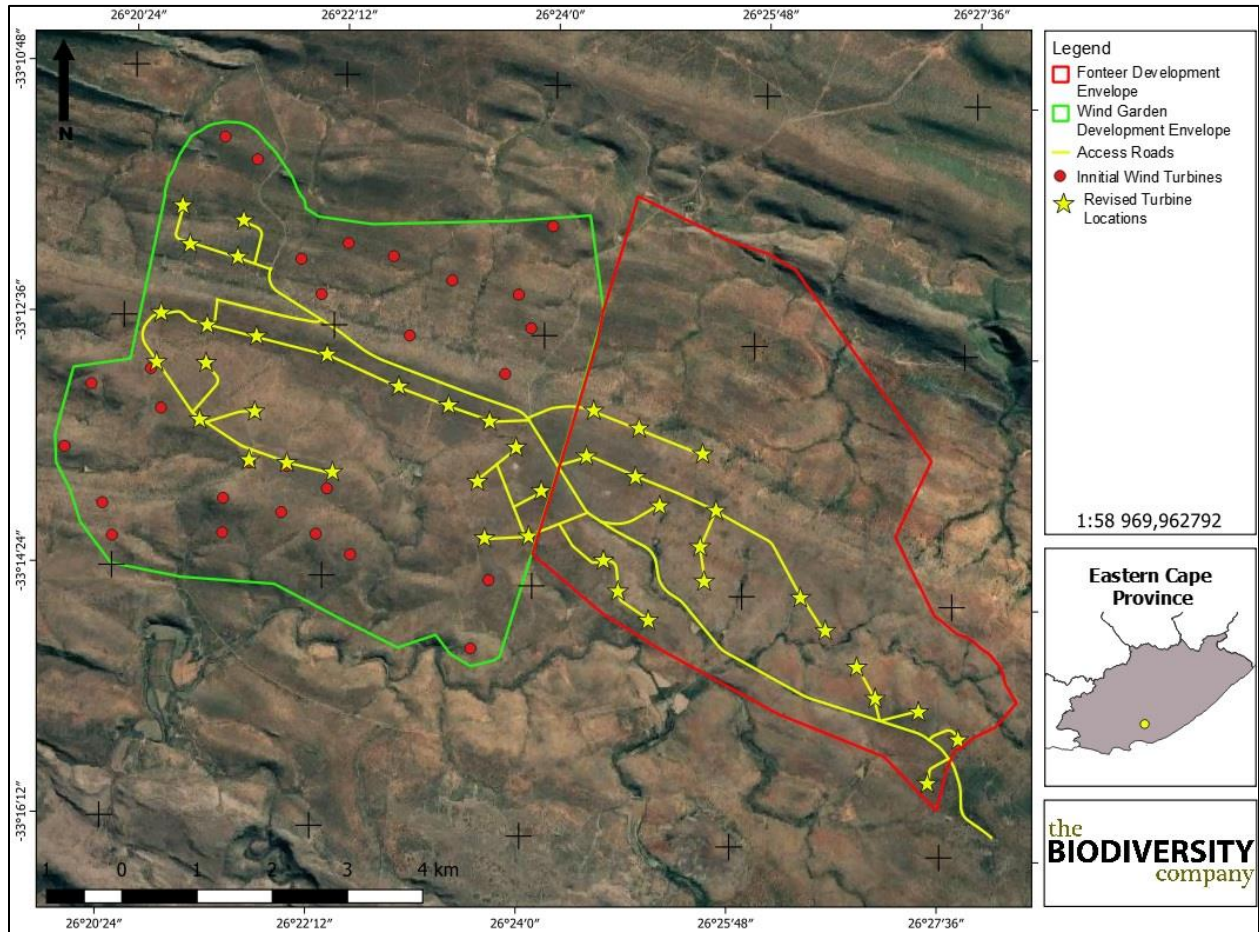


Figure 1 Illustration of initial and amended turbine locations (2020 vs 2022)

Wind Garden and Frontier - Optimised layout

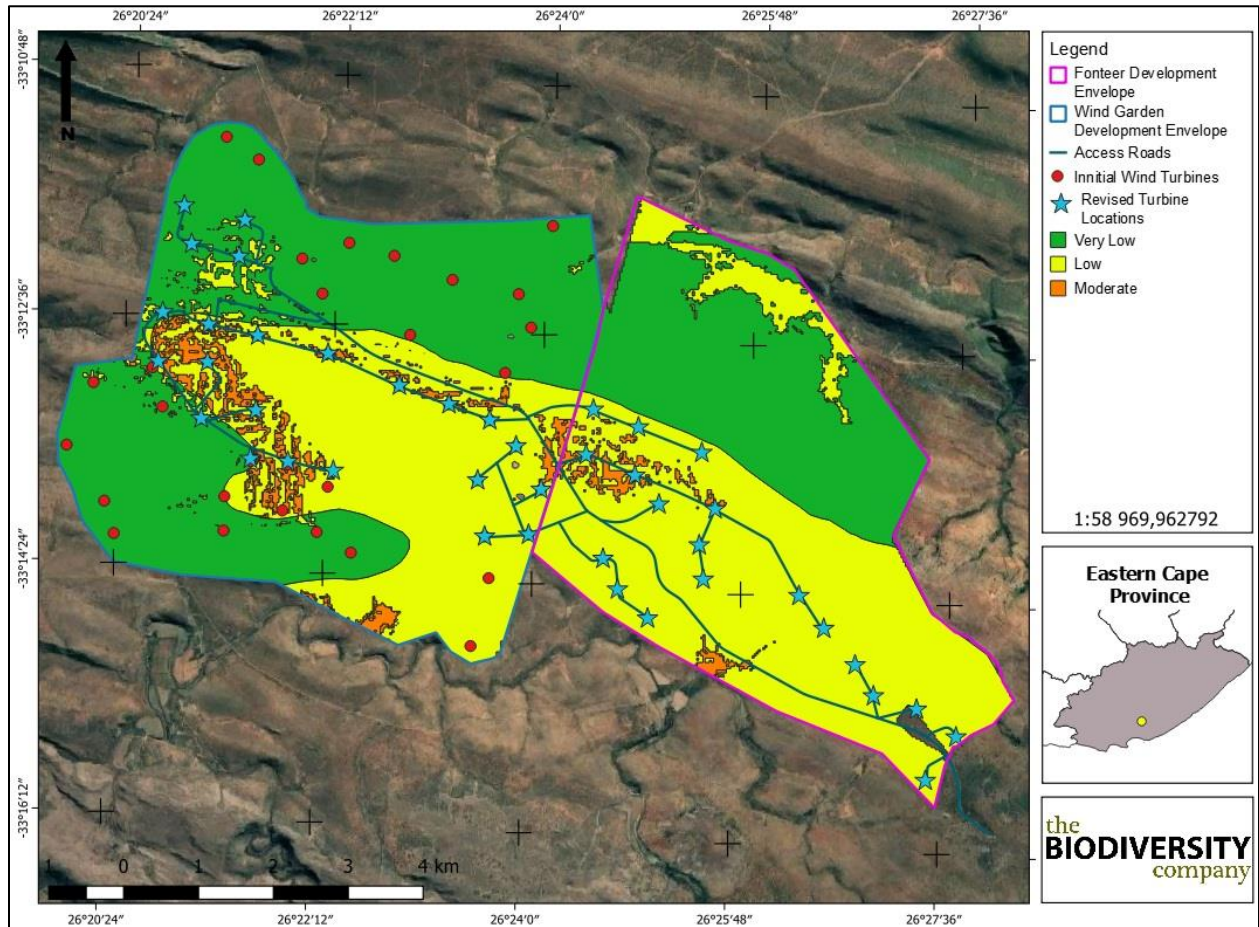


Figure 2 Sensitivities associated with the Frontier and Wind Garden development envelopes