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CES - Environmental and Social Advisory Services
Grahamstown
Attention: Ms. Caroline Evans

Our ref: RWS/cfa/CSP20-001
DEA ref.: 14/12/16/3/3/2/1131

Per email: c.evans@cesnet.co.za

13 July 2020

Dear Caroline

RE: COMMENT ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT FOR THE ALBANY WIND ENERGY FACILITY (DEA REFERENCE NUMBER: 14/12/16/3/3/2/1131)

1. INTRODUCTION

- 1.1. Richard Summers Inc was appointed by Kwandwe Private Game Reserve (“Kwandwe”) to review and comment on the Draft Environmental Impact Assessment Report (DEIR) for the proposed Albany Wind Energy Facility¹ (“proposed Albany WEF”).
- 1.2. The game reserve and ecotourism industry in the Eastern Cape are highly significant sectors that stand to be adversely affected by the proposed Albany WEF and other developments of a similar nature. Kwandwe Private Game Reserve is situated in close proximity to the proposed Albany WEF and has a direct and material interest in the outcome of this application, as it stands to be one of the most directly affected stakeholders.
- 1.3. Kwandwe Private Game Reserve also forms part of the statutorily protected and formally declared Indalo Protected Environment (“Indalo PE”) which is represented by nine Game Reserves (measuring 76 076,59 hectares in extent).² The Indalo PE was founded with the objective to promote biodiversity conservation and ecological sustainability on a much larger

¹ DEA reference number: 14/12/16/3/3/2/1131.

² Declaration Notice in Provincial Notice 70 in *Provincial Gazette* 4030 dated 13 April 2018, page 3.

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scale than individual reserves, and to present a unified voice on issues affecting the tourism and game reserve industry.

- 1.4. In terms of the conservation and protection of vegetation biodiversity targets and the wildlife conservation value of Kwandwe and the Indalo PE, and the ecosystem protection and ecosystem services they provide, the contribution made by Kwandwe and the Indalo PE is significant. This conservation value and the environmental, social and economic benefits of Kwandwe and the Indalo PE hinges entirely on the continued, long-term economic viability of the eco-tourism businesses underpinning the sustainability of the existing operations.

2. SUMMARY OF KEY ISSUES REGARDING THE DEIR

- 2.1. The treatment of alternatives in the EIA process is deficient and fails to satisfy the legal requirements for the investigation and evaluation of alternatives to the activity during the EIA process.
- 2.2. The quantification of the socio-economic impact on game reserves and the tourism sector is one of the most significant issues identified during public participation process and this impact remains unresolved. Because of the high level of importance attached to this particular concern in relation to the proposed Albany WEF (evidenced by this concern being raised by numerous I&APs during the Scoping and Assessment phase), this constitutes a fatal flaw.
- 2.3. The nature of this obligations imposed in terms of the National Environmental Management Act, No 107 of 1998 (“NEMA”) requires the EAP to assess, among other things, the cumulative impact on the environment brought about by the proposed Albany WEF and all other existing and/or proposed WEFs that are in close proximity to the proposed Albany WEF. This in turn requires the EAP to assess the impact on the sustainability of existing game reserves and ecotourism operations. Although the socio-economic impact of the proposed Albany WEF has been identified as a concern in the DEIR and specialist assessments, the direct, indirect and cumulative impacts have not been quantified.



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A T T O R N E Y S

- 2.4. The issue of ecosystems and biological diversity cannot be determined with reference to the contents of the biophysical specialist reports alone. The fact that the site is not considered ecologically sensitive is not the only issue of relevance. Absent from the EIA process is any consideration of the impacts on the conservation estate and biodiversity benefits of the Indalo PE where this and other WEFs (directly, indirectly or cumulatively) impact on the viability and sustainability of the existing game reserves and ecotourism operations of the Indalo PE and its constituent members.
- 2.5. Key stakeholder concerns are unresolved. The Indalo Management Authority consistently raised the concern that the proposed Albany WEF may jeopardise the core eco-tourism business model of any of the game reserves comprising the Indalo PE and thereby threaten the substantial conservation and socio-economic benefits that these protected areas provide.
- 2.6. The evaluation and consideration of need and desirability of the proposed Albany WEF does not satisfy the EIA best practice, nor does it meet the peremptory requirements prescribed by NEMA in this regard.
- 2.7. None of the questions or issues identified in the *2017 Need and Desirability Guideline* has been directly and expressly addressed by the EAP in the DEIR. Section 24O of NEMA has not been complied with as there is no indication that the EAP had regard to relevant guideline published in terms of section 24J of NEMA and associated minimum information requirements.
- 2.8. The indirect, cumulative and consequential impacts on Kwandwe Private Game Reserve, and the Indalo PE (and the individual game reserves comprising the Indalo PE) have not been quantified in circumstances where the proposed Albany WEF and other projects of a similar nature adversely affect the sustainability of these game reserves, statutorily declared protected areas, and ecotourism existing operations.



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- 2.9. The scope of assessment is defective as it excludes substations and transmission lines which comprise core infrastructure for the proposed Albany WEF and which infrastructure ultimately dictates the location of the project and the development footprint.
- 2.10. The project specifications of turbines used in the assessment is inconsistent and there is uncertainty regarding the extent to which a change in turbine or technical specifications may impact on the DEIR findings relating to impacts and significance thereof.
- 2.11. The information required to aid the significance rating of certain impacts are unknown and assumptions were drawn based on previous experiences.
- 2.12. The DEIR and specialist assessments ignore the sensitivity mapping and analysis with the result that the final proposed Albany WEF layout included in the DEIR is not the optimal layout from an environmental perspective, because it fails to respect all environmentally sensitive areas as NO-GO areas.
- 2.13. The various information gaps identified in these comments have the combined effect of compromising the ability of stakeholders to engage meaningfully in the EIA process and to be able to comprehend and interpret the nature, severity and duration of project related impacts. This undermines the public participation process and renders it meaningless.
- 2.14. The DEIR omits to include an updated comments and response table in order to specifically explain to stakeholders and I&APs how various comments throughout the EIA process have been addressed. This too renders the public participation process meaningless and defective.
- 2.15. Two external reviews have been commissioned in order to review the efficacy of the VIA and the EIA process as a whole. Both external reviews have identified that the EIA and the VIA suffer from fatal flaws and material omissions and as a result cannot serve as a basis for accurate impact evaluation and/or defensible decision-making by the competent authority.



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A T T O R N E E Y S

- 2.16. The gaps and omissions in the assessment are extensive and constitute a material flaw in the EIA process. Due to the high levels of speculation and the categories of relevant information classified by the relevant specialists as unknown, the DEIR fails to comply with minimum legal requirements and cannot support reasonable or rational decision-making by the competent authority.
- 2.17. These issues are described in more detail in Sections 3 – 7 of this document, read together with the following Annexures comprising these Comments:

ANNEXURE A – EXTERNAL REVIEW OF VISUAL IMPACT ASSESSMENT REPORT DATED APRIL 2020 BY BERNIE OBERHOLZER AND QUINTON LAWSON (INCLUDING VISUAL SENSITIVITY MAPS 1 – 18 ATTACHED TO THE REVIEW)

ANNEXURE B – KWANDWE PRIVATE GAME RESERVE CLIENT SURVEY RESULTS

ANNEXURE C – EXTERNAL REVIEW OF DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT DATED APRIL 2020 BY GLOBAL GREEN.

3. ALTERNATIVES

- 3.1. The DEIR recognises that “alternatives”, in relation to a proposed activity, means *different* means of meeting the general purpose and requirements of the activity but the EIA undertaken in relation to the proposed Albany WEF fails to consider any alternatives that could be construed as *different* means of meeting the general purpose and requirements of the activity. By way of illustration, the Visual Impact Assessment (“VIA”) report claims that the EIA process involved “*evaluating the various alternatives associated with the Albany WEF proposal and the identification of the preferred alternative, is provided in the Environmental Impact Assessment Report (EIAR) for this project*”.³ This is highly misleading and incorrect.
- 3.2. This submission focusses on the manner in which “alternatives” has been dealt with in the

³ Page 26, VIA report.



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context of the EIA process for the proposed Albany WEF. The comment regarding alternatives is described in three distinct parts: (1) the manner in which the DEIR deals with alternative *technologies*; (2) the claim that alternative *layouts* have been provided by the Applicant; and (3) a brief review of the no-go option.

Alternative Technologies

- 3.3. The reliance on alternative technologies in the DEIR as “alternatives” for the purposes of the EIA Regulations is misleading. The “*alternative energy technology*” options described in section 7.2.4 of the DEIR are identified as coal fired power plants, biomass and nuclear power. None of these is a true or genuine alternative – or *different* means of meeting the general purpose and requirements of the activity - for the purposes of satisfying the EIA Regulations.
- 3.4. Regarding the assessment of technology alternatives, we point out that⁴:
- 3.4.1. Section 7.2.4 of the DEIR expressly refers to the activity or project as being for a *renewable energy development only*.
- 3.4.2. The NEMA listed activities applied for by the Applicant are described in the DEIR as being for the development of facilities/infrastructure for the generation of electricity from a *renewable resource*.
- 3.4.3. It is plain from the Applicant’s own description of the project in the DEIR that neither coal fired power plants, biomass nor nuclear power facilities constitute a genuine alternative technology option for the proposed Albany WEF which self-evidently is a renewable energy development.
- 3.5. Similarly, the options of solar and concentrated solar power identified in the DEIR as

⁴ Described in the DEIR as Alternative Energy Technologies 4, 5 and 6 on page 89, DEIR.



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alternatives are not genuine alternatives for the purpose of NEMA or the EIA Regulations.

This is evident from the following:

- 3.5.1. The DEIR states that “*only the most feasible and competitive developments are selected*” for the EIA and that “*solar plants will only be competitive if they are located in the highest potential areas*” in the Eastern Cape.⁵
- 3.5.2. The potential energy production maps reproduced in the DEIR indicate that the study area - where the Applicant wishes to undertake a renewable energy development - is most suitable for wind energy production.⁶
- 3.5.3. The DEIR confirms that the study area would not be competitive with solar plants located in the higher potential areas.⁷
- 3.6. It is evident that neither solar plants, coal fired power plants, biomass nor nuclear power are reasonable or feasible “alternatives” or different means for achieving the *project* viz a wind farm. This begs the question why these so-called alternative technologies were included and described as “alternatives” in the DEIR when it is plainly clear that they are not alternatives in any sense of the term. The reliance on these ‘options’ does not satisfy the NEMA requirement relating to the evaluation and assessment of alternatives.

Alternative layouts

- 3.7. The DEIR incorrectly claims that more than one project layout was assessed in the EIA process. This statement is demonstrably false, as illustrated by the following:
 - 3.7.1. The project entails a layout of a maximum of 66 turbines which was the only layout assessed. Although the DEIR misleadingly claims that a 90-turbine layout was also

⁵ Section 7.2.4, DEIR.

⁶ Figures 7-1 to 7-4, DEIR.

⁷ Page 84, DEIR.



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assessed, this is plainly incorrect and misleading. There are only two passing references to a 90-turbine layout in the entire DEIR.⁸

- 3.7.2. The DEIR states that all specialists assessed a 'draft layout' of 90 turbines and the results were assessed *by the developer* in order to inform the layout described in the DEIR.⁹
- 3.7.3. This so-called "preliminary layout"¹⁰ of 90 turbines and its assessment *by the developer* was never made available to I&APs at any time during the EIA process. It was rather determined *by the proponent* based on a "desktop pre-screening"¹¹. In other words, the 90-turbine layout was not assessed at any time during the EIA in accordance with the EIA Regulations but was rather considered by the proponent as an internal exercise.
- 3.7.4. The results of the desktop pre-screening by the proponent were analysed in order to inform the project layout presented in the DEIR. The only layout that was in fact assessed, was the proponent's preferred option of a 66-turbine layout.
- 3.7.5. There is no evidence that the 66-turbine layout was ever adjusted to respond to the impact assessment during the EIA. The EAP undertook that this (layout adjustment) would take place "*based on the outcomes of the specialist assessment during the EIA phase*". It is plainly evident from the DEIR that only the developers preferred layout has been assessed. At no stage was the proponents preferred layout materially modified to respond to environmental constraints.
- 3.7.6. The 66-turbine layout has also not responded to the sensitivity map. This is evident from the fact that there has been no attempt to avoid the turbines that give rise to high impacts. It is particularly concerning that none of the turbines with a VERY HIGH or HIGH negative visual impact identified during the VIA has been avoided to ensure that the layout is optimal from an environmental perspective. The EAP has thus failed to adhere

⁸ In referencing Alternative Layout 1 on page 90 and page 96, DEIR.

⁹ Page 96, DEIR.

¹⁰ Page 90, DEIR.

¹¹ Page 90, DEIR.



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A T T O R N E Y S

to the undertaking that “*all environmentally sensitive areas have been designated as NO-GO areas*”¹² in the final proposed layout.

3.7.7. The self-stated aim of the Socio-Economic Impact Assessment (“SIA”) report is to provide an appraisal of possible socio-economic consequences and make recommendations for feasible *alternatives* and realistic mitigation measures.¹³ There is no evidence in the SIA report of any alternatives recommended or assessed by the Social Specialist during the SIA.

3.8. In summary, the 90-turbine layout is not a genuine alternative. It was not subject to any independent evaluation / assessment in terms of the EIA Regulations. The correct factual position is that no layout alternatives were investigated, evaluated or assessed. Accordingly, the DEIR states the correct factual position where it records that only “*the final proposed WEF*” of 66 turbines was included in the EIA.¹⁴

No-go option

3.9. The DEIR indicated that “*all feasible alternatives*” and the “*no-go option*” will be equally assessed in order to evaluate the significance of respective impacts.¹⁵ This did not take place.

3.10. In the DEIR, the no-go alternative is portrayed only in terms of the negative impacts associated with not undertaking the proposed development. This approach unfairly emphasises only the positive impacts of allowing the project to be undertaken, whilst excluding the full cost benefit analysis required in terms of the EIA Regulations.

3.11. The selective emphasis on the fact that the benefits of the project will not be realised operates to exclude other relevant considerations. There is no balanced account of the relative assessment of all risks and benefits associated with the *status quo* i.e. the no-go

¹² Page 90, DEIR.

¹³ Page 19, SIA report.

¹⁴ Page 90, DEIR.

¹⁵ Page 118, DEIR.



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alternative. This concern is illustrated by the following examples:

- 3.11.1. With regard to the no-go option the VIA report states: *“In the case of the Albany WEF, the development can have local job-creation benefits, while at the same time adding to the energy security of the region.”* There is no attempt to balance this against the fact the no-go option will not give rise to WEF *“high visual impact on the landscape”* and *“losses of scenic resources”* identified in the DEIR.
- 3.11.2. With regard to employment related impacts, the SIA report states that the effect of the no-go option will be that *“No employment and associated benefits will accrue to local communities or the broader Makana LM as a result of this project.”* There is no attempt to balance this against the fact that the number of employment opportunities at Kwandwe (in the reserve management and hospitality components) will not be affected by the no-go option as this will not give rise to WEF impacts that threaten the sustainability of the existing ecotourism operations.

VIA alternatives

- 3.12. The VIA report recognises the fundamental importance of alternatives assessment to the EIA as follows: *“Integral to the EIA process is the consideration and evaluation of alternatives to a proposed development plan”*¹⁶. The EAP (who also acted as the visual specialist) however failed to carry this through into the assessment.
- 3.13. The fact that various alternatives were not assessed during the EIA process is confirmed by the following:
 - 3.13.1. Paragraph 3.7 (above) illustrates that only one project alternative was assessed during the EIA process.

¹⁶ Page 26, VIA.



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- 3.13.2. With regard to the location of alternatives, the VIA report confirms that only one site (the project area) has been considered in the report.
- 3.13.3. With regard to technological alternatives, the VIA report confirms that only the development of a *wind energy facility* has been considered in the VIA report.
- 3.13.4. With regard to layout alternatives, the VIA confirms that only the proponent's preferred alternative - the turbine layout of 66 turbines — has been assessed.
- 3.14. In terms of applicable policy and guidelines¹⁷ Level 4 Visual Assessment ought to consist of *inter alia* a description of alternatives and mitigation measures as some of its main elements. The investigation and implementation of alternatives in connection with the VIA and the DEIR was simply not done in connection with this project. The failure to investigate alternatives serves as confirmation that the EIA is fatally flawed and specifically the VIA has failed to satisfy the NEMA requirements regarding the evaluation of alternatives.

Summary of comment on Alternatives in the DEIR

- 3.15. The references in the DEIR to alternatives is self-serving and does not satisfy the prescribed legal requirements of NEMA. NEMA requires a genuine consideration of a range of alternatives *viz* different means of achieving the activity by stipulating that the EIA must ensure that reasonable and feasible alternatives are identified, described and evaluated with regard to the objectives of NEMA. The EAP has not assessed a different means of meeting the general purpose and requirements of the activity in question.
- 3.16. The DEIR reference to alternative technologies is misleading. The other technologies listed are not true alternatives to the project, and alternative layouts were not assessed at all.
- 3.17. The approach to alternatives in the EIA process pays lip service to the requirement regarding

¹⁷ For example, the DEA&DP NEMA EIA Guideline Series June 2005 - Involving visual and aesthetic specialists in EIA processes.



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alternatives assessment. The VERY HIGH and HIGH significance ratings of adverse visual impacts in this case make the consideration of alternative sites especially relevant to this project and this must first be satisfied in order for the NEMA requirement to be addressed.

3.18. The DEIR does not satisfy the objective in Item 2(d)(i) of Annexure 3 of the EIA Regulations regarding the obligation to determine the nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives.¹⁸

3.19. In the circumstances, no alternatives can be regarded as having been applied for, consulted on during the EIA or its impacts investigated in terms of NEMA or the EIA Regulations. The EAP has effectively bypassed the requirement to identify and confirm the preferred site and final project layout, through a detailed selection process, which ought to have included an identification of impacts and risks inclusive of identification of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological social, economic, and cultural aspects of the environment.

4. NEED AND DESIRABILITY

4.1. The need for and desirability analysis in the DEIR is superficial and fails to satisfy the NEMA requirements. The purpose of this section is to highlight the primary concerns with the need for and desirability analysis, with emphasis on the following:

4.1.1. The DEIR does not specifically and explicitly address project need and desirability *throughout* the EIA process, nor does it do so *specifically* in the overall impact summary or in dealing with individual project impacts identified.

4.1.2. The DEIR fails to specifically and explicitly address any of the pertinent need and desirability questions listed in the 2017 *Need and Desirability Guideline* (DEA: 2017).

¹⁸ EIA Regulations, Appendix 2, (1)(g)(viii) and (1)(h)(ix).



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- 4.1.3. The DEIR does not specifically and explicitly evaluate each impact (both negative and positive) in terms of the criterion of “need and desirability” for each of the aspects of the environment affected by the proposed Albany WEF project.
- 4.1.4. The need for and desirability analysis in the DEIR fails to give a balanced account of applicable policy in relation to the project, and instead selectively focuses only on policies regarding green technology and the promotion of renewable energy, thereby ignoring the associated costs and negative impacts of undertaking the development.
- 4.2. As will be described more fully below, these failures ultimately render the assessment lopsided and have the effect of favouring the approval of the project to the exclusion of a considered and balanced assessment of all relevant policies, project costs and negative impacts. The inadequate analysis defeats the foundational aim of the EIA process *viz* to identify, predict and evaluate the actual and potential risks for and impacts on the environment, including socio-economic considerations. These failures, in turn, contribute to the EAP’s failure to identify alternatives that avoid negative impacts altogether, or minimise and manage negative impacts. In these circumstances, both the EIA process and the project are fatally flawed.

Failure to explicitly address the impact mitigation hierarchy

- 4.3. Central to the *2017 Need and Desirability Guideline* is the recognition of the importance of the hierarchical approach to impact management. The DEIR falls short in this regard because it singularly fails to implement the Impact Mitigation Hierarchy. This is a critical deficiency in the EIA, which is demonstrated by the following:
- 4.3.1. The DEIR concludes that the proposed Albany WEF “*will undoubtedly have a high visual impact on the landscape*” and that “*the potential losses of scenic resources are high*”.¹⁹

¹⁹ Page 113, DEIR.



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- 4.3.2. Despite the findings of VERY HIGH and HIGH negative visual impacts, only one project “alternative” was assessed and that is the proponents’ preferred project alternative.
- 4.3.3. Throughout the Screening, Scoping and Assessment phases of the EIA, the VERY HIGH and HIGH visual impacts identified were neither avoided nor mitigated. There has been no attempt to avoid all environmentally sensitive areas by designating these as NO-GO areas.
- 4.3.4. The EAP has not demonstrated that impact avoidance is not possible either with reference to empirical evidence or in terms of accepted EIA practice.
- 4.3.5. The EAP ignores the obvious conclusion that negative impacts could be *avoided altogether* by removing turbines that give rise to VERY HIGH and HIGH negative visual impacts, but no such measures were explored or implemented to minimise or remedy these identified impacts.
- 4.4. As a decision-making tool to assist the competent authority (and I&APs) in determining whether the proposed activity satisfies the criterion of need and desirability and constitutes the best environmental option contemplated in NEMA, the EIA process is compromised because the “need and desirability” analysis reported in the DEIR completely ignores the Impact Mitigation Hierarchy. This results in flawed EIA outcomes which favour the project proponent to the exclusion of all other relevant considerations. This failing – the failure to deal with all aspects relevant to need and desirability – represents a clear and manifest breach of the principle of sustainability foundational to NEMA and the EIA process.

Failure to explicitly address any ecological considerations

- 4.5. The *2017 Need and Desirability Guideline* recognises the importance of national policies and strategies that take cognisance of strategic concerns such as climate change, food security, “*as well as the sustainability in supply of natural resources and the status of our ecosystem services*”. There is no indication in the DEIR of how project impacts on ecosystem services



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or conservation value has been considered in the need and desirability analysis (if at all). Chapter 3 of the DEIR (Need and Desirability) is devoid of reference to these ecological considerations or how this project impacts on the ecological integrity of the area and ecosystem services provided by game reserves in the area including specifically the Kwandwe Private Game Reserve and the Indalo PE.

- 4.6. The DEIR myopically focuses only on *certain* strategic concerns and the biophysical aspects of the site and ignores that fact that the spatial and temporal context required to be analysed in order to satisfy the need and desirability enquiry is broader than this (DEA: 2017).
- 4.7. The concern regarding project impacts on ecological integrity was appropriately framed by stakeholders during the public participation process in relation to the following two areas: (1) the impact on the operations of existing game reserves and ecotourism operations; and (2) the impact on the Indalo PE. Neither issues have been addressed in the EIA process and remain unaddressed and unresolved.
- 4.8. Specifically, the following considerations have not been explicitly taken into account and/or reported on in the DEIR:
 - 4.8.1. The broader potential indirect and consequential impact on Threatened Ecosystems if the sustainability of the Kwandwe Private Game Reserve and the Indalo PE is compromised.
 - 4.8.2. The impact on Critical Biodiversity Areas (“CBAs”), Ecological Support Areas (“ESAs”), and conservation targets currently secured and statutorily protected in the Kwandwe Private Game Reserve and the Indalo PE.
 - 4.8.3. The impact on global and international responsibilities relating to the environment and protected areas management.
 - 4.8.4. The impact on identified vegetation types in the study area (a significantly high proportion of which the EIA recognises are statutorily conserved in the Indalo PE and in



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a number of private reserves, including Kwandwe).

- 4.9. The impact on the Indalo PE and its contribution to the above ecological integrity considerations is simply not addressed at all in the DEIR. The comments submitted by Indalo Protected Area Management Authority remain pertinent:

“The Indalo Protected Area Management Authority opposes the proposed location of any wind energy facility that may jeopardize in any way the core eco-tourism business model of any of the game reserves within the Indalo Protected Environment and thereby threaten the substantial conservation and socio-economic benefits that these protected areas provide.”²⁰

- 4.10. The DEIR gives no consideration to the potential consequences of impacts on tourism (game reserves and associated ecotourism industry in the area) or the resultant loss or protection of biological diversity that will follow if the feasibility and/or sustainability of these operations is adversely impacted due to the VERY HIGH and HIGH visual impact on the landscape and associated loss of scenic resources that the DEIR and specialist assessments have identified *will* occur if the project is allowed to proceed.
- 4.11. Despite the EAP admitting (correctly) that it is *“vital to consider the socio-economic impacts of the proposed WEF on the surrounding game farms which form part of the Eastern Cape’s tourism industry from both an eco-tourism and hunting perspective”²¹* this was not done in either the scoping or assessment phase of the EIA. This is a fatal flaw.

Failure to explicitly address sustainability

- 4.12. The DEIR fails to address sustainability explicitly as a key consideration relevant to the need and desirability evaluation in terms of NEMA. This omission undermines the fact that ultimately the need for and desirability of the project is based on the principle of

²⁰ Page 249, DEIR.

²¹ Section 3.6, DEIR.



RICHARD SUMMERS INC.
ATTORNEYS

sustainability (DEA: 2017). This omission is illustrated by the following:

- 4.12.1. The stakeholder comment that the *“respective specialist would have to conduct a comparison of the positive economic benefits and sustainability between this development and the tourism industry of the Region where the project is proposed”*²² has not been addressed and the relevant concern is unresolved.
- 4.12.2. There is no reference in the Section 3.6 of the DEIR to sustainability as set out in the Constitution and in NEMA, or as provided for in various other relevant policies and plans, including *inter alia* the National Development Plan 2030.
- 4.12.3. There are only three references to ‘sustainability’ throughout the entire DEIR (cf. Sections 6.5.4; 6.8; and 10 of the DEIR) and none of those references explicitly relate to, or deal with, the economic, social or environmental sustainability of the project. The issue is simply not dealt with.
- 4.12.4. There is a failure to recognise and integrate into the assessment process the principle of sustainability specifically in relation to each identified project impact.
- 4.12.5. The DEIR fails to assess the impact on the sustainability of ecotourism, existing game reserves and the tourism industry which are policy objectives are consistent with Strategic Objective 1.5 of the Eastern Cape Vision 2030 Provincial Development Plan.
- 4.12.6. The DEIR does not expressly reference or integrate all policies relevant to the principle of sustainability. There is no reference at all in the DEIR to the National Sustainable Development Policy or other strategic policies that promote the principle of sustainability.
- 4.12.7. There is no reference at all to biodiversity and conservation management policies or

²² Page 251, DEIR.



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A T T O R N E E Y S

strategic objectives. There is also no reference at all to protected areas management policies or related protected areas strategic objectives.

- 4.13. The DEIR fails to address the question of need, desirability and sustainability in the manner contemplated in *Fuel Retailers Association of SA (Pty) Ltd v Director General, Environmental Management Mpumalanga and Others*.

Failure to address the strategic context

- 4.14. When evaluating need and desirability of project specific applications, such as the proposed Albany WEF, the strategic context of such applications should be considered. The DEIR fails to achieve this for the following reasons:

4.14.1. In terms of the overarching strategic context, only a small section of the proposed Albany WEF falls within Renewable Energy Development Zones (REDZ) 3 (Cookhouse). At best for the Applicant, a maximum of 20% of the site falls within this REDZ. The DEIR fails to motivate in terms of the *Need & Desirability Guideline* why the bulk of the project departs from the REDZ.

4.14.2. During the public participation process, stakeholders expressly identified that a motivation is required regarding why the development is being proposed outside the REDZ.²³ The EAP's response to this in the DEIR is inadequate and merely states that the site was selected based on both wind potential and the land use of the properties, and that "*other factors will be detailed in the EIR and various specialist studies...*".²⁴ The EAP's response does not address the stakeholder concern and nor does it provide the requisite motivation. In fact, neither the DEIR nor the specialist studies convincingly motivate why the development is being proposed outside the REDZ. The concern therefore remains unaddressed and unresolved and is a material flaw in the need and desirability analysis.

²³ Page 251, DEIR.

²⁴ Page 251, DEIR.



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A T T O R N E Y S

4.14.3. The DEIR unquestioningly relies on considerations relevant only to the proponent regarding its (i.e. the developer's) decision to undertake the proposed Albany WEF outside of REDZ. This is illustrated by the following response in the DEIR:

"...when developers identify wind resources which are economically desirable coupled with sites which are situated within a close proximity to existing Eskom distribution infrastructure. The decision, by Albany Wind Power, to investigate the proposed site stemmed from the high wind potential of the site combined with the available capacity of the Eskom substation".²⁵

Failure to address environmental context

4.15. In order to improve on the level of integration of social, economic, ecological considerations and its associated impacts, NEMA provides for the compilation of information and maps that specify the sensitive attributes of the affected environment. Appropriately responding to the identified sensitive attributes of the environment is a hallmark of the need and desirability analysis, but in this case the environmental sensitivities have been ignored in this analysis.

4.16. The Global Green review confirms this concern by concluding that the *"sensitivity map provides the location of high sensitive / constraint zones **with little thought seemingly to avoiding these sensitive locations...** The impression is that the geographical sensitivity was mapped and then **the location of the turbines ignored it.**"²⁶*

Selective and disproportionate focus on certain policies

4.17. The DEIR focuses on high level policies in order to argue that the project is compatible with the policy context such as the South African Integrated Resource Plan with no commensurate focus on directly relevant considerations applicable to project's need an desirability being

²⁵ Page 95, DEIR.

²⁶ Page 13, Global Green review.



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A T T O R N E Y S

identified.

- 4.18. There is universal support for the “need” to be cognisant of climate change in order to promote renewable sources of energy and leveraging a green economy. But this alone is not sufficient to motivate need and desirability for the proposed Albany WEF project in terms of NEMA. Chapter 3 of the DEIR (Need & Desirability) is devoid of any reference to policy objectives relating to the environmental conservation, biodiversity protection and protected areas management.
- 4.19. NEMA requires the principle of sustainability to be addressed from three components (social, economic, and ecological), which the DEIR fails to achieve. NEMA also requires the strategic policy context to be reviewed with direct reference to the bespoke project level considerations and concerns that come to light during the EIA process. Again, the DEIR does not do this. Instead the DEIR singularly focuses on generic policy goals and objectives associated with renewable energy. In doing so the EAP has diverted focus away from the principle of sustainability and issues that are directly relevant to impact assessment at project scale.
- 4.20. In summary, the exclusive reliance in the DEIR on policy in support of green energy and universally applicable high-level policy goals e.g. climate change mitigation does not satisfy the NEMA requirement relating to need and desirability.

Unsubstantiated claims

- 4.21. The DEIR relies on the following misleading and/or unsubstantiated claims:
- 4.21.1. The project “*will contribute*”²⁷ to local development objectives and socio-economic benefits but the SIA report expressly acknowledges that those benefits have not been qualitatively assessed.

²⁷ Page 32, DEIR.



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A T T O R N E Y S

- 4.21.2. The DEIR cites “*significant direct foreign financial investment*”²⁸ and benefits for local communities without substantiating this claim based on data or empirical evidence attributable to the proposed Albany WEF project.
- 4.21.3. The DEIR cites generic REIPPP “*local content requirements*” that “*can lead*”²⁹ to socio-economic benefits without in any way quantifying or qualifying this generalisation in relation to the proposed Albany WEF project especially regarding the alleged benefits for local industry, the creation of skilled and unskilled jobs in terms of which no concrete data is provided in the DEIR.
- 4.21.4. Chapter 3 of the DEIR (Need & Desirability) places a heavy emphasis on the United Nations Framework Convention on Climate Change UNFCCC and the Kyoto Protocol as being relevant to the need and desirability enquiry because, so it is claimed in the DEIR, the proposed Albany WEF project will contribute to a reduction in greenhouse gasses (“GHG”). The DEIR expressly relies on several national policies to claim a GHG emission reduction benefit associated with the project.³⁰ The claim that this project will contribute towards a reduction in GHG emissions is not substantiated anywhere in the DEIR. There is no study undertaken of existing emissions or emissions displacement by the project to support the benefit that the EAP alleges will be achieved by the project. There is also no recognition in the DEIR of international literature which shows that the emission displacement in respect of wind farm projects is in any event potentially very low.³¹
- 4.21.5. The DEIR claims that the proposed Albany WEF is consistent with the White Paper on Renewable Energy Policy and the objectives therein, “*thus contributing to sustainable development and environmental conservation*”³² The claim that this shows that the

²⁸ Page 32, DEIR.

²⁹ Page 32, DEIR.

³⁰ This same motivation is rolled out in respect of 5 other policies cited by the EAP in support of the project: National Development Plan (DEIR, section 3.4.1); National Climate Change Response White Paper (DEIR, SECTION 3.4.2); Long Term Mitigation Scenarios (DEIR, SECTION 3.4.7); Industrial Policy Action Plan (DEIR, SECTION 3.4.8); and Eastern Cape Climate Change Strategy (DEIR, SECTION 3.5.2).

³¹ Thompson et al. Marginal greenhouse gas emissions displacement of wind power in Great Britain.

³² Page 26, DEIR.



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A T T O R N E Y S

project contributes to sustainable development or environmental conservation is superficial and is not substantiated.

Irrelevant considerations

4.22. The DEIR relies on the following information that is intended to motivate in favour of the proposed Albany WEF project as being compatible with policies promoting renewable sources of energy:

4.22.1. The REIPPP is claimed to be relevant to need and desirability (DEIR, section 3.4.6). The fact that the REIPPP has gone through four bidding phases and is entering a 5th bidding phase has no direct bearing at all to the need and desirability enquiry for the purposes of NEMA.

4.22.2. The DEIR references the ANC ruling party's 2019 election manifesto to show that the project is compatible with green energy.

4.22.3. The DEIR incorrectly motivates need and desirability for the project as demonstrating South Africa's commitment to its international obligations in terms of UNFCCC and the Kyoto Protocol. This is inaccurate and misleading. South Africa has no binding obligations in terms of the Kyoto protocol or the UNFCCC.

4.22.4. The DEIR also motivates the project with regard to a description of South Africa's electricity supply constraints without any empirical data to show how the project will resolve those constraints.

4.23. In light of the above, the DEIR fails to substantiate and/or motivate how these factors are relevant to need and desirability at project level. The suggestion that these considerations are at all relevant to need and desirability is misleading, and serves to underscore that the need and desirability enquiry is based on irrelevant considerations.



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Ignores relevant policy objectives

- 4.24. Applicable policy is selectively referenced by the EAP. The DEIR highlights only those issues which show compatibility between the proposed Albany WEF project and certain identified strategic policy objectives, with the result that the need and desirability analysis fails to provide a balanced consideration of all relevant social, economic, and ecological considerations.
- 4.25. This concern is illustrated with reference to the Eastern Cape Vision 2030 Provincial Development Plan (“PDP”):
- 4.25.1. The PDP draws on other national planning documents, including the National Infrastructure Plan and the Industrial Policy Action Plan (2014 to 2016) to show that environmental challenges relate not only to climate change, but also include threats to biodiversity etc.³³ The DEIR ignores this as the need and desirability analysis is devoid of any biodiversity-related policy considerations.
- 4.25.2. The DEIR focusses exclusively on climate change and renewable energy policy and ignores equally important objectives such as the objective to nourish and protect the provincial tourism economy. In this regard, the PDP expressly identifies game reserves in the Eastern Cape Province as top attractions for international tourists and that international tourism spending is 40% greater than domestic tourism spending.³⁴
- 4.25.3. The socio-economic significance of game reserves to the strategic policy objective of growing and developing the tourism industry in the Eastern Cape Province is highlighted by the fact that the rise and success of game reserves “*and the lucrative tourism business they attract, point to the potential material and social successes to be realised if a well thought through and ambitious development of the deprived rural parts of the Eastern*

³³ Page 117, PDP.

³⁴ PDP Strategic Section 1.5.5: Grow and develop the tourism industry.



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A T T O R N E Y S

Cape were to be undertaken.”³⁵

- 4.25.4. The PDP identifies seven sectors with high potential for economic development. One of these is the Tourism Sector (and specifically includes eco-tourism). Whilst the PDP also lists the renewable energy sector, the fact is that both sectors are equally relevant. Notwithstanding, the analysis in the DEIR strongly suggests that the renewable energy is the only relevant consideration, which is clearly not the case if one views applicable policy more holistically.
- 4.25.5. Equally important is the fact that policy strategy identified in the PDP is for the Province to use its competitive advantages to grow the volume and value of eco-tourism in the Province, and to avoid activities that undermine the Tourism Sector through inappropriate and insensitively located development.
- 4.25.6. The assessment in the DEIR falls short of these strategic policy objectives as the VERY HIGH and HIGH negative visual impacts of the proposed Albany WEF directly undermine the very resource upon which the ecotourism in the area derives a significant competitive advantage. The review by Global Green confirms Kwandwe’s concern that there will be a negative impact on ecotourism operations, but the DEIR has failed to investigate and quantify this impact.

Stakeholder concerns remain unaddressed and unresolved

- 4.26. At the outset of this process, key stakeholder concerns identified that the EIA process must be able to show that *“the project will not compromise the localised Climate Change Adaptation process for the area. It should be noted that area is within one of the areas identified as a climate change corridor as well as an ecological corridor linking existing protected areas within the Province.”³⁶*

³⁵ Page 56, PDP.

³⁶ Page 250, DEIR.



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- 4.27. The EAPs response to this was that the Ecological Specialist Report *will assess* the impacts of the proposed development on the climate change corridor (and the ecological corridor linking protected areas, including the Indalo PE). The fact that this was not done is illustrated by the following:
- 4.27.1. The scope of study undertaken in the Ecological Impact Assessment is superficial – the assessment is limited to analysing only the direct impacts on the site and it completely ignores the potential indirect and consequential impact of the project (and the cumulative impact) on the ecological integrity and ecosystem services of the broader area, including the Indalo PE.
- 4.27.2. The Ecological Impact Assessment is fatally flawed as it only recognised The Beggars Bush State Forest and the ECCA Local Authority Nature Reserve within the proposed Albany WEF study area, to the exclusion of other statutorily protected areas such as Kwandwe Private Game Reserve and the Indalo PE.
- 4.27.3. Kwandwe forms part of Indalo PE which borders the proposed site. Although no turbines or associated infrastructure are proposed within Kwandwe Private Game Reserve and the Indalo PE, the extent to which the proposed Albany WEF may impact indirectly on the statutorily protected areas has not been considered, evaluated or assessed.
- 4.28. The Ecological Impact Assessment does not analyse any of the above-mentioned aspects and this is a key limitation in the need and desirability analysis in the overall EIA process which is required to consider ALL relevant issues (in this case this refers to impacts on the ecological corridor) to be viewed more holistically. There is no consideration of the broader ecological issues at all in the DEIR or the Ecological Impact Assessment and this key stakeholder concern remains unaddressed and unresolved.
- 4.29. The DEIR pays lip service to the potential costs of the project especially regarding potential impact on the tourism industry, which remains unquantified and unassessed. The DEIR claims incorrectly that the “*potential socio-economic*” impact on the tourism industry sector



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have been “*well outlined and assessed as part of the Socio-Economic Impact Assessment*”³⁷. This claim is both false and misleading. In fact, section 3.6 of the DEIR relies heavily on the SIA which it claims draws on “*evidence*” and “*conclusions*” obtained during an “*extensive study*”. This fundamentally misrepresents the correct position and overstates the efficacy of the evaluation. The SIA does not assess this impact.

Summary of comment on project need and desirability

- 4.30. As demonstrated throughout these comments, the impact assessment for the proposed Albany WEF is deficient, with various key concerns remaining unaddressed and unresolved. The need and desirability analysis – which is a critical component of the EIA process and is intended to serve as a “*mirror of the impact summary*” (DEA: 2017) – reflects this deficient and incomplete evaluation of the relevant issues.
- 4.31. Need and desirability is critical to the EIA process. It is where the integration of environmental, social and economic considerations relevant to project EIA and the principle of sustainability entrenched in section 2 of NEMA come to the fore. The DEIR undermines the relevance of need and desirability in the EIA process in the following manner:
- 4.31.1. By failing to answer the list of questions in the Need and Desirability Guideline which should be addressed when considering need and desirability of a proposed development.³⁸ This leaves I&APs at a disadvantage by depriving them of the ability to meaningfully understand the cost benefit analysis that NEMA and the EIA Regulations require.
- 4.31.2. By failing to explain how the development serves the principle of sustainability, including explaining: (1) how the development may impact ecosystems and biological diversity; (2) how the development will impact ecological sustainability; and (3) how the development

³⁷ Page 32, DEIR.

³⁸ There is no evidence that the 2017 *Need & Desirability Guideline* was taken into account or that the issues and specific questions required to be addressed are dealt with explicitly.



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will address the socio-economic impacts of the development. In these circumstances, it is not possible for I&APs to make an informed understanding of how the development will impact on their environmental rights.

- 4.31.3. By failing to explain how the development entails the balancing of the factors identified in the Need and Desirability Guideline and the impacts identified in the DEIR which, in turn, compromises the efficacy of the public participation process.
- 4.31.4. By failing to explain the proposed development in context of the ALL applicable spatial planning tools and policy instruments relevant to applicable to the study area.
- 4.31.5. By a disproportionate and biased focus on national policies and strategies that support renewable energy as a key strategic objective to the exclusion of other relevant policies that promote ecological sustainability; biodiversity and conservation management priorities for expanding the protected area network for ecological sustainability and climate change adaptation (e.g. National Protected Area Expansion Strategy For South Africa 2008).
- 4.31.6. By crudely framing the proposed development as a choice between the *status quo* (i.e. the no-go alternative) and the positive socio-economic growth the EAP attributes to allowing the proposed Albany WEF to proceed.
- 4.31.7. By the inadequate recognition of the socio-economic benefits and multiplier effects associated with the contribution of existing game reserves to the local and provincial economy. This is not expressly recognised in a way that the need and desirability of a development entails the objective balancing of all relevant factors.
- 4.31.8. By paying lip service to the potential costs of the proposed Albany WEF and particularly the potential impact on the tourism sector and game reserves in the area.
- 4.32. In summary, the main concerns identified in connection with the need and desirability



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analysis include the following:

- 4.32.1. Based on the DEIR, it is not possible to determine whether the proposed activity is the best environmental option, because the “need and desirability” component of the EIA fails to be informed by impacts identified and/or the sum of all the impacts considered holistically.
- 4.32.2. The need and desirability evaluation is singularly biased towards motivating for the proposed Albany WEF and fails to address all relevant environmental, social and economic considerations in a balanced and objective manner. The positive project-related aspects are overstated, and the negative consequences of the proposed Albany WEF project are not quantified. Key elements of the analysis are missing (e.g. impacts on land values) and have not been investigated at all.
- 4.32.3. Section 3.2 of the DEIR identifies the main drivers as only those that are compatible with the project (expanding green energy, securing and improving security of electricity supply and the socio-economic benefits associated with the green economy) and ignores other relevant considerations.
- 4.32.4. The DEIR references international conventions and local policy selectively on the basis of highlighting only those that support the drivers that operate in favour of the project as identified by the EAP. The clear impression created is that the EAP supports unequivocally the proposed development irrespective of project specific impacts or the significance and/or severity of impacts.
- 4.32.5. The need and desirability analysis is incomplete because key ecological considerations are unresolved and key impacts are unaddressed. Impacts on ecological conservation targets and ecosystem services are not addressed at all in the DEIR.
- 4.33. The need and desirability analysis categorically fails to satisfy the legal requirement imposed in NEMA and the EIA Regulations to implement a hierarchical approach to impact



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management.

5. VISUAL IMPACTS

5.1. In terms of significance ratings, the VIA report states:

*“Negative impacts that are ranked as being of “VERY HIGH” and “HIGH” significance will be investigated further to determine how the impact can be minimised or what alternative activities or mitigation measures can be implemented.... The most effective and practical mitigations measures will then be proposed”.*³⁹

5.2. This was simply not done. There has been no attempt to implement the hierarchical approach to impact management through impact avoidance to address the negative visual impacts ranked as being of “VERY HIGH” and “HIGH” significance.

5.3. The VIA report does not satisfy the requirements of a Level 4 Visual Assessment. Firstly, the VIA fails to describe or assess any genuine project alternatives. Secondly, it fails to prescribe or implement impact avoidance and/or mitigation measures required to address high impacts. Thirdly, it fails to ensure that the assessment is undertaken by an *“independent visual specialist.”*⁴⁰

5.4. Not one of the significance ratings in the VIA report has varied between pre- and post-mitigation, notwithstanding the fact that the negative visual impacts are ranked as being of high significance. This alone serves as confirmation that the EIA is fatally flawed and the VIA – as a critical component of the EIA process - has failed to integrate the findings of high negative visual impacts in the assessment process.

5.5. The visual impacts of the project were some of the key concerns identified by stakeholders

³⁹ Page 49, VIA report.

⁴⁰ GUIDELINE FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS IN EIA PROCESSES (DEA&DP).



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during the public participation process. Given the findings of VERY HIGH and HIGH significance of visual impacts, coupled with the fact that no meaningful attempt has been made to avoid and/or mitigate adverse impacts, Kwandwe commissioned an independent review of the VIA report. The review was undertaken by Bernie Oberholzer and Quinton Lawson both of whom are experts in visual impact assessment and widely recognised leaders in this field. The report by Bernie Oberholzer and Quinton Lawson (attached hereto marked “A”) must be read as if incorporated into and forming part of these comments.

- 5.6. The findings of the Oberholzer / Lawson review include the following:
 - 5.6.1. The conclusions in the VIA report are questionable, having not been adequately informed by accurate baseline information.
 - 5.6.2. The avoidance of high significance visual impacts is completely ignored.
 - 5.6.3. Several findings in the VIA report lack credibility.
 - 5.6.4. The DEIR ignores the high scenic value and wilderness quality of the study area and the negative impacts on visual scenic resources are not meaningfully responded to.
 - 5.6.5. There is limited evidence of proper screening having been undertaken during the EIA in order to avoid visually sensitive areas.
 - 5.6.6. The DEIR ignores the REDZ visual mapping which shows that this portion of the REDZ 3 is classified as very high visual sensitivity.
 - 5.6.7. The VIA was conducted ‘in house’ by the EAP and the external peer review report commissioned by the EAP cannot be relied upon as an independent expert peer review.
 - 5.6.8. The VIA report is riddled with self-contradiction. For example, on the one hand recognising the integrity and value of scenic resources and the high potential loss of such



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resources as a result of the proposed Albany WEF, but then failing to implement any measures to avoid and/or mitigate this high adverse impact.

- 5.6.9. The impact of lighting at night from critical viewpoints has not been addressed at all.
- 5.6.10. The EAP's attempt to justify the high visual impact on the landscape by stating that the lifespan of the project is only 20- 25 years is highly questionable and unscientific.
- 5.6.11. The VIA report contains too many omissions and inaccuracies, and does not serve as a basis for informed recommendations or assessments regarding the visual acceptability of the proposed Albany WEF.
- 5.7. Due to the errors and inaccuracies in the VIA, the findings in the DEIR regarding visual impacts are disputed and not regarded as credible for the purposes of satisfying the national environmental management principles in section 2 of NEMA. It is plainly evident that the concerns previously raised by I&APs about significant adverse visual impacts have been ignored and this constitutes a fatal flaw in the EIA process.
- 5.8. In terms of the implications of the significance ratings, the VIA report states: Negative impacts that are ranked as being of "VERY HIGH" and "HIGH" significance will also "*assist decision makers i.e. numerous HIGH negative impacts may bring about a negative decision.*"⁴¹ In light of the large number of turbines that gives rise to significant negative impacts ranked as being of "VERY HIGH" and "HIGH" significance, coupled with the material flaws, inaccuracies and omissions in the VIA report, the Department would be justified in refusing the application. The Oberholzer / Lawson review concludes that large portions of the proposed Albany WEF represent a fatal flaw based on the sensitivity maps analysed as part of the review.
- 5.9. The DEIR explicitly states⁴² that turbines should not be erected in direct view of lodges and

⁴¹ Page 49, VIA report.

⁴² Pages 110 and 186, DEIR.



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strategic viewpoints on surrounding game reserves such as Kwandwe. Notwithstanding, the proposed Albany WEF layout has not only not undergone any changes in response to the EIA findings, but the impact avoidance option is blatantly ignored. No attempt at all has been made to reduce “high significant” impacts on visual sensitive receptors such as Kwandwe through mitigation in order to avoid adverse impacts.

- 5.10. The concern that the visual impacts (both during day and night) of the proposed Albany WEF on Kwandwe Private Game Reserve gives rise to unacceptably high impacts which will damage the landscape and undermine the integrity of the visual scenic resource is confirmed by the independent assessment by Oberholzer and Lawson. This in turn will have a direct detrimental effect on the tourism experience offered by Kwandwe and will negatively affect the sustainability of its ecotourism and hospitality business and the marketability of the tourism product it is able to offer. In the longer term, this will undermine the financial viability and sustainability of the environmental management of the landholding and its conservation outcomes. On this basis alone, the NEMA application for the proposed Albany WEF should be refused outright.

6. SOCIO-ECONOMIC IMPACTS

- 6.1. This section counters the evidence and conclusions put forward by the Applicant in the DEIR suggesting that the socio-economic impacts of the proposed WEF on the surrounding game farms and the tourism sector have been assessed. The DEIR misleadingly states the position as follows:

“The potential socio-economic sector has been well outlined and assessed as part of the Socio-Economic Impact Assessment. This report draws on evidence and conclusions obtained during an extensive study”⁴³

- 6.2. The purpose of this section is to prove that the DEIR’s reliance on the argument that

⁴³ Page 32, DEIR.



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potential socio-economic sector has been well outlined and assessed in the Socio-Economic Impact Assessment Report⁴⁴ (SIA report) is factually incorrect. In doing so, we address several fundamental and critical limitations to the assessment and findings in the SIA report. In addition, we address the research relied upon by the SIA specialist by *inter alia* referencing other relevant literature related to impacts on tourism associated with wind farms.

Information gaps / omissions

- 6.3. The EAP has submitted the SIA report in support of the overall EIA findings but ignores the fact that the data and methodology used in the SIA report are unsuitable to infer anything about the project socio-economic impacts of the proposed Albany WEF on the surrounding game farms and ecotourism operations. The reasons for this comment include:
- 6.3.1. The SIA report is styled as a socio-economic impact assessment, but the report is prepared by a social specialist. There is no evidence that the specialist is appropriately qualified to undertake a economic impact assessment or has the necessary qualifications and expertise required to compile a specialist economic impact assessment report, or to assess and determine the significance of the socio-economic impacts required by NEMA.
- 6.3.2. Section 4 of the SIA report recognises the contradiction in the purported scope of the study. It describes the “*primary purpose of a SIA is to determine and analyse the likely impacts of a proposed development or event on a specific group of people or a community’s way of life, character and social cohesion.*”⁴⁵ The self-stated purpose of the SIA report makes no reference to the assessment of economic impacts and reaffirms that the primary focus is on social impacts.
- 6.3.3. The SIA report relies on generic benefits (such as those associated with the REIPPP) without providing any project specific information or data about the perceived socio-economic benefits relied upon by the specialist to serve as motivation for the project.

⁴⁴ Dated March 2020 prepared by Integrated Rural & Urban Development Expertise (Pty) Ltd t/a INDEX.

⁴⁵ Page 19, SIA report.



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Limited project specific data is taken into consideration, as this information is categorised in the SIA report as an “*unknown*”.⁴⁶

- 6.3.4. The SIA report relies on *other projects* to argue that local employment benefits associated with the proposed Albany WEF are “*probable*”, but the percentage of local employment at other wind farm developments in the area (the SIA only refers to Waainek Wind Farm) is classified as *unknown* and the SIA report concedes the cumulative impact cannot be rated.⁴⁷ This is a critical information gap which has not been resolved.
- 6.3.5. The SIA report reveals that the confidence rating is low in many areas of the impact evaluation due to the lack of evidence and absence of key information. Each of these represents a critical information gap in the EIA which has not been resolved:
- 6.3.5.1. Details of the procurement process and strategy for the proposed Albany WEF are unknown.⁴⁸
- 6.3.5.2. Details of specific training and skills development for the proposed Albany WEF are unknown.⁴⁹
- 6.3.5.3. The monetary value of the contribution of the proposed Albany WEF towards the local economy is unknown.⁵⁰
- 6.3.5.4. Regarding potential impact on land values, the SIA report notes “***insufficient information*** is available (*monetary values, concrete evidence of farm values, etc.*)”⁵¹
- 6.3.5.5. Impacts perceived during the decommissioning phase were not rated in the SIA report,

⁴⁶ Page vii, SIA report.

⁴⁷ Page 66, SIA report.

⁴⁸ Page 68, SIA report.

⁴⁹ Page 75, SIA report.

⁵⁰ Page 108, SIA report.

⁵¹ Page 105, SIA report. Emphasis added.



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and the specialist concedes that this is due to the limited information available.⁵²

- 6.3.5.6. The percentage of social and economic development contributions to be committed by the proposed Albany WEF is not defined and depends on REIPPP tender documents *“which are yet to be released by the DMRE and on EDF Renewables’ bidding strategy”*.⁵³
- 6.3.5.7. Where detailed information was not available, data of *other* projects in the Eastern Cape was used by the SIA specialist as baseline to determine the significance of the socio-economic impacts for *this* project. There is insufficient data /evidence to show that the reliance on other projects is a credible basis to quantify the impacts associated with the proposed Albany WEF project.
- 6.3.6. The SIA report is self-contradictory. On the one hand it acknowledges the need for the details in the Applicant’s Social and Economic Development plans to be transparently available to the local government and the community, but then detailing *“exactly what commitments the Albany WEF makes on each element would not be prudent at this stage as they are unknown.”*⁵⁴
- 6.3.7. The uncertainty regarding key impacts and lack of relevant data is compounded by the SIA report which relies on unsubstantiated statements regarding the perceived project benefits, including:
- 6.3.7.1. The number of foreigners/expatriates employed on renewable energy projects has decreased over time, as skills have gradually been transferred to South Africans.⁵⁵
- 6.3.7.2. Skilled professional would be available locally due to experience gained during

⁵² Page v, SIA report.

⁵³ Page 11, SIA report.

⁵⁴ Page v, SIA report.

⁵⁵ Page 65, SIA report.



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construction of the Waainek Windfarm and similar projects in the Eastern Cape.⁵⁶

- 6.3.8. The entire premise upon which perceived value / benefits for the proposed Albany WEF contribute to the local economy is thus inaccurate and unquantified. This severe limitation in the EIA is compounded by the acknowledged relevance of this information to a credible assessment. The SIA report itself recognises that *“All SED and ED plans should be transparently available to the local government and the community.”*⁵⁷ This has not happened. There is no transparent or accountable basis for enabling I&APs to make meaningful and informed representations regarding the relative socio-economic costs and benefits of the project due to the lack of key information.

Conclusions drawn in the SIA report

- 6.4. Overall, the SIA report cannot be relied upon as a basis for the findings in the DEIR regarding perceived socio-economic impacts for the proposed Albany WEF. The SIA specialist concedes that the assessment is fatally flawed as *“currently no direct evidence exists to state the assessment of the unique circumstances as true nor false.”*⁵⁸
- 6.5. There are several reasons why the approach in the SIA is flawed, and thus fails to provide evidence that the proposed Albany WEF’s **impact on the tourism sector** has been dealt with satisfactorily:
- 6.5.1. The SIA uses no primary research or empirical data to account for the failure to quantify the impact on tourism in connection with this project, despite the explicit recognition that negative impacts are “possible”.
- 6.5.2. No acceptable methodology was used to test the hypothesis that *“initial negative perceptions by tourists (if any) could decline overtime”*.⁵⁹

⁵⁶ Page 17, SIA report.

⁵⁷ Page 114, SIA report.

⁵⁸ Page 103, SIA report.

⁵⁹ Page 103, SIA report.



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- 6.5.3. The SIA report relies heavily on “*international research with regards to wind farms impact on tourism*”⁶⁰ but consults only a select and limited number of international studies which does not equate to, and is no valid substitute for, robust primary research.
- 6.5.4. Many of the international studies relied upon by the SIA relate to developments in Europe, some of which are offshore wind farms, and none of which is comparable to the specific project or the study area in terms of its landscape character and the unique aesthetic qualities of the scenic resources. The studies cited by the SIA are not representative of the proposed Albany WEF study area or the specific project-related impacts.
- 6.5.5. Situations equivalent to the proposed Albany WEF have not been considered or assessed in the SIA report.
- 6.5.6. In referencing “*international research*”, the SIA report makes no attempt at distinguishing between neutral, peer-reviewed academic papers and those studies which are recognised as biased and commissioned by stakeholders with a vested interest in the outcome *viz* industry commissioned studies.
- 6.5.7. The finding that “*No evidence has transpired to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism*” is highly questionable.
- 6.5.8. The failure to cite any reliable data is not justified by the fact that no development of the same scale as Albany WEF has been approved in this particular location, where landscapes and scenic resources with high tourist potential and attractiveness would be directly threatened and impacted (as proven by the VIA). A precautionary approach is therefore called for in these circumstances.

⁶⁰ Page 100, SIA report.



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- 6.6. An objective review of the international literature reveals that there are very few case studies which conclusively demonstrate that tourism is unaffected by developments of this nature. The more pertinent and relevant question is not whether or not there will be an impact (the SIA identifies that such impacts are possible) but rather the extent, severity and duration of the identified impact. This has not been quantified.
- 6.7. The studies cited in the SIA report are inadequate for several reasons, including the significance of impact is related to the scale of these projects, and many projects referenced in the international literature is entirely different from the proposed Albany WEF. Further, the location, community affected, and nature of the major tourism activity affected in the case studies is totally different from the proposed Albany WEF.
- 6.8. The SIA report makes sweeping unsubstantiated statements, including (1) that individuals become “*desensitised*” towards man-made structures; and (2) that communities become more “*tolerant*” of WEFs as they recognise the advantages of green energy. This is speculative and is unsupported by empirical data or primary research. The claim that initial negative perceptions by tourists could decline over time is a crude over-simplification (as illustrated below).
- 6.9. A more balanced account of relevant international studies in this field shows:
- 6.9.1. There is no support in the literature for the view that wind farms do not damage the tourism industry.
- 6.9.2. The reaction to turbines is affected by the landscape and where they see them. Tourists generally prefer to not see any turbines in pristine, wilderness places or coastal locations (Fialte Ireland, 2008).
- 6.9.3. The general consensus in terms of landscape protection and EIA best practice is that turbines must be located away from designated areas (e.g. protected areas, national



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parks and Areas of Outstanding Natural Beauty, and scenic areas) and rather situated in areas where the visual and environmental impacts on tourism would be minimised (Frantal and Kunc, 2011).

- 6.9.4. The premium paid for tourism / hospitality accommodation increases by as much 25% where the view was not compromised.⁶¹
- 6.9.5. The negative socio-economic impacts are not offset or compensated by the suggestion that there is positive interest in turbines. Various studies have shown that the initial positive interest by tourists in WEFs (if any) is short lived as the novelty factor soon wears off (Tourism Co. 2012). There is no evidence that stakeholders become “*desensitised*” or used to turbines which impact on scenic landscapes.
- 6.9.6. If a small minority of tourists are negative about the visual impacts of the proposed Albany WEF and who believe that turbines compromise the landscape and tourism experience, this translates into potentially serious negative socio-economic impacts with far reaching consequences. In a study by VisitScotland (2008), 25% of tourists were concerned by wind farms. In a study by Frantal and Kunc (2011), 27% of tourists would not return to the area affected. In terms of socio-economic impacts, even a minority can equate to a very significant adverse impact and can give rise to significant adverse economic impacts (Riddington et al, 2008: Fialte Ireland, 2007).
- 6.9.7. Other studies shows that the perception of stakeholders is actually aggravated over time as more projects of a similar scale and nature are developed within the study area / receiving environment.⁶² This results in an increasing aversion to WEFs and is directly proportional to the number of wind farm developments in the area as the cumulative impacts increasingly negatively affect the integrity of the landscape and the scenic resource.

⁶¹ Riddington *et al* (2010).

⁶² Mountaineering Council of Scotland (2014).



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- 6.10. Generic assumptions and perceptions relied upon in the SIA make no provision for project specific details which are central to project specific impacts. We point out the following aspects which have not been taken into the account:
- 6.10.1. The tourism industry is highly competitive, sensitive and susceptible to subtle changes in market conditions.
- 6.10.2. The nature, severity and significance of the impact depends on the number of turbines, the specific characteristics of tourism activity in each location, and the source of the economic drivers for ecotourism of the sector.
- 6.10.3. The socio-economic impact of any activity detrimental to tourism manifests from a reduction in expenditure from two sources: a reduction in the number of visitors and all of the multiplier effects that follow from that; and a reduction in prices that could be charged for hotel accommodation.
- 6.10.4. The assumptions and conclusions drawn in the SIA makes no account for the highly sensitive nature of tourism sector. It is incontrovertible that in a fragile economy many businesses will fail in times of economic hardship and stress, and the SIA makes no account for this.

Client survey

- 6.11. There has been no attempt by the SIA specialist to engage tourists with personal experience of Kwandwe about the potential impacts of the proposed Albany WEF. Due to the speculative nature of the SIA report and the EIA regarding impact on tourism and the failure to engage directly with the sector most affected by the development, Kwandwe Private Game Reserve has engaged and consulted its client base in order to offer an insight of how its clients would respond to the construction of the proposed Albany WEF in close proximity to Kwandwe and how that development would be perceived by tourists who are familiar



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with the landscape and the ecotourism product offered by Kwandwe.

- 6.12. The purpose of undertaking the survey is to offer an insight into the views of existing clients which is a critical gap in the EA process. The survey is not intended to be a scientific assessment and nor does it purport to replace the need for the Applicant to undertake an adequate impact evaluation and assessment in accordance with the requirements of the EIA Regulations. It is however a strong indicator of the personal views of various of Kwandwe's clients who have visited the Game Reserve in the past and it offers tangible evidence of how tourists perceive windfarm related impacts as well as how it might influence their behavior and choices in future regarding tourism destinations. The survey results underlie the seriousness of the threat posed by inappropriately located developments (such as the proposed Albany WEF) to the long-term sustainability of Kwandwe's ecotourism operations.
- 6.13. A copy of Kwandwe's client survey results is attached hereto marked "B".

Summary of comments on the SIA findings

- 6.14. In summary, the large number of data categories classified as unknown, the reliance in the SIA on generic assumptions and untested conclusions is problematic and is no substitute for primary research on the project specific impacts in connection with the proposed Albany WEF.
- 6.15. The failure to assess and quantify the socio-economic impacts on the tourism sector is highly problematic. The case for a detailed evaluation and assessment of this impact is compelling, particularly as the SIA report recognises the significance and importance of the Indalo PE and associated game reserves (such as Kwandwe) in achieving "*conservation and protection of vegetation biodiversity targets*" and the "*wildlife conservation value*", and the ecosystem protection it offers. Moreover, the SIA report identifies that this conservation and ecosystem value "*hinges entirely on the continued economic viability of the eco-tourism*



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*businesses underpinning the nine game reserves*⁶³ comprising the Indalo PE.

- 6.16. In conclusion, the SIA fails to provide evidence of no impact on tourism following the construction of the proposed Albany WEF and it fails to quantify this impact although it is recognised as a likely outcome of the project.

7. EXTERNAL REVIEW

- 7.1. Richard Summers Inc commissioned Global Green Environmental Consultants (“Global Green”) - in association with the Environmental Assessment Research Group (“EARG”) from the North West University - to undertake an external review of the DEIR. The results of that review are contained in a report dated May 2020 and must be read as forming part of these comments. The Global Green review is attached as “C”. The key findings of the review are summarised below:

- 7.1.1. **Non-compliance:** The Global Green review confirms the extent to which the DEIR fails to comply with minimum legal requirements in terms of NEMA and the EIA Regulations. The overarching finding is that the content of the DEIR is not satisfactory, does not comply with NEMA requirements and cannot serve to support and inform defensible decision-making by the competent authority.

- 7.1.2. **Omissions and inadequacies:** The review identifies the following material flaws in the EIA:

- 7.1.2.1. The assessment methodology failed to apply the mitigation hierarchy with the result that avoidance as a mitigation measure is ignored or overlooked.

- 7.1.2.2. The assessment fails to deal with the most significant impact identified by I&APs viz the impact on surrounding ecotourism enterprises and game farms.

⁶³ Page 31, SIA report.



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- 7.1.2.3. The 2017 Need and Desirability Guideline has not been consulted, and none of the questions in the Guideline has been directly and expressly addressed.
- 7.1.2.4. The assessment is incomplete because the DEIR excludes critical project infrastructure (including substations and transmission line) from the project description and project footprint calculation.
- 7.1.3. **Alternatives:** There is no evidence to show how the EIA and specialist assessments considered the 90-turbine alternative as is claimed in the DEIR (or how any alternative was assessed). Only one alternative - the 66-turbine alternative - was assessed. The inference being that the 66-turbine alternative was first decided by the Applicant and then the specialists assessed the already preferred alternative only, meaning that the outcome was predetermined and non-complaint with Section 240 of NEMA.
- 7.1.4. **Key issues raised by I&APs are unresolved** - this includes:
- 7.1.4.1. The commitment made during the scoping phase that the visual and socio-economic impacts of the WEF on sensitive visual receptors (including each affected landowner, game farm and nature reserve) and on tourism operations in the area will be assessed has not been addressed and remains unfulfilled. There is no evidence that this was done. The outcome of the DEIR on these key issues is inconclusive and speculative.
- 7.1.4.2. The impact of the WEF on land values remains unresolved despite the SIA report acknowledging that this is an issue. The SIA recommendation that this impact should be investigated and rated separately by a Land Valuer / Economist was never acted on.
- 7.1.5. **Significance ratings:** Neither the Final Scoping Report nor the DEIR explain how significance will be determined and the lack of a clear and systematic (and uniformly applied) method manifests in inconsistencies in the EIA findings. The evaluation criteria



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presented in the Final Scoping Report is inconsistently applied in the DEIR, which calls into question the rationale as well as accuracy of the significance ratings identified by the EAP.

- 7.1.6. **Unsubstantiated claims:** The DEIR and specialist assessments contain false and unsubstantiated claims in relation to key issues and impacts, in particular in relation to the impact of the WEF on the eco-tourism industry. No attempt was made in the DEIR to quantify the impacts of WEFs on game reserves or eco-tourism facilities in any meaningful and scientifically valid way. The assessment overwhelmingly relies on the false claim in the SIA report that there is no evidence to support the assertion that any wind farm overseas has resulted in any adverse impact on tourism. This is a false generalisation based on an outdated report on the tourism impact of wind farms in Scotland (Aitchison, 2012).
- 7.1.7. **Impacts on game farms and ecotourism sector:** As above, this key issue has not been assessed. The failure to evaluate what seems to be the most significant concern with the proposed Albany WEF raised by I&APs, is a fatal flaw in the DEIR. The conclusion that no game farms are visually affected / have experienced negative economic impacts by existing wind farms is highly questionable and based on an unverifiable method and results, rather than robust verifiable and peer reviewed research.
- 7.1.8. **Inconsistent findings:** The EIA concedes that there will be an impact on lodges and strategic viewpoints on the game farms, but how significant that impact will be has not been answered. This issue is unresolved. These potential impacts are recognised in the DEIR but not consistently addressed or mitigated in any way in the DEIR.
- 7.1.9. **Public participation:** The failure to include an updated version of the comments and response table in the DEIR to explain how the various comments raised throughout the process have been addressed is a serious omission.
- 7.1.10. **Mitigation:** The DEIR fails to systematically consider and analyse how each particular impact may be avoided, minimised, restored / reversed or compensated. There is no



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evidence of the mitigation hierarchy actually being applied. There has been no attempt to 'avoid' impacts on sensitive viewpoints, even though the option of relocating or reducing the number of turbines is explicitly recommended by the SIA specialist and the DEIR (see page 110).

- 7.1.11. **Visual impacts:** The visual impact assessment concluded a “high significance” impact on visual sensitive receptors (direct and cumulative impacts) and “moderate significance” rating for impact of night lights before and after mitigation, but there is no indication that avoidance was considered, or the impact mitigation hierarchy applied. It further stems to reason that with a minimum of 35 turbines required to make the development viable, ample scope exists to apply avoidance as a mitigation option to the proponent’s 66-turbine preferred alternative in order to resolve visual impacts of HIGH significance.
- 7.1.12. **Contradictory statements:** The SIA report states that “*No mitigation is possible as turbines cannot be screened ...*” and seems to suggest that avoidance is not considered a form of mitigation. There has been no attempt to 'avoid' impacts on sensitive viewpoints by relocating or reducing the number of turbines, even though this option is explicitly recommended by the specialists.
- 7.1.13. **Failure to respond to sensitivity mapping analysis:** The sensitivity map provides the location of highly sensitive / constraint zones with little thought given to avoiding these sensitive locations. The impression is that the geographical and environmental sensitivity was mapped and then the site layout and location of the turbines ignored the sensitivity mapping during the EIA.

Summary of Global Green external review

- 7.2. The assessment and reporting in the DEIR are not satisfactory with various significant omissions and inadequacies compromising the efficacy of the EIA process as a whole. In the result, the external review by Global Green confirms that neither the DEIR nor the level of assessment undertaken can be viewed as supporting defensible decision-making by the



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competent authority in terms of NEMA.

8. CONCLUSION

- 8.1. The EIA process in terms of NEMA and the EIA Regulations promulgated thereunder, if correctly and accurately done, is an acknowledged tool for giving effect to sustainable development. However, achieving a sustainable outcome requires a balanced integration of ALL relevant environmental, social and economic considerations identified during the EIA process. Development that is identified as potentially impacting on the viability of existing operations and/or development which gives rise to unacceptably high visual impacts (which impacts are in no way avoided nor mitigated) does not satisfy the principle of sustainability or the concept of sustainable development contemplated in the *Fuel Retailers* case.
- 8.2. These comments, which must be read together with the external reviews by Global Green and Oberholzer & Lawson confirms that: (1) the proposed Albany WEF gives rise to unacceptably high visual impacts; (2) the socio-economic impact on surrounding game reserves and eco-tourism enterprises identified is directly linked to the significance and severity of the visual impact; and (3) the DEIR fails to quantify and account for the most significant potential socio-economic impacts of the project, namely the impact of the proposed Albany WEF on existing game reserves and ecotourism operations within the tourism sector. This is a fatal flaw in the EIA process.
- 8.3. The competent authority is called on to exercise its discretion in terms of Regulation 24 of the EIA Regulations by **rejecting** the DEIR and **refusing** the application for environmental authorisation.

Yours sincerely,

RICHARD SUMMERS INC

Proposed Albany Wind Energy Facility,
Makana Municipality, Eastern Cape

Review of Visual Impact Assessment

22 April 2020

Prepared for
Richard Summers Inc.

Prepared by
Bernard Oberholzer and Quinton Lawson

Contents

1	Background to the review	3
2	Purpose of the Review	3
3	Assumptions and Limitations	3
4	Definition of 'Visual'	4
5	Role of the VIA	4
6	Comments on the Findings of the VIA Report	4
7	Peer Review of the Visual Impact Report	6
8	Site Verification	6
9	Additional Comment on the VIA Report	7
10	Visual Sensitivity Mapping	10
11	Conclusions and Recommendations	11
	References	12
	Statement of Independence	13

Abbreviations

CAA	Civil Aviation Authority
DEA	Department of Environmental Affairs
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
HIA	Heritage Impact Assessment
HWC	Heritage Western Cape
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
PGWC	Provincial Government of the Western Cape
REDZ	Renewable Energy Development Zone
SANBI	South African National Botanical Institute
SAPAD	South African Protected Areas Data Base
SEA	Strategic Environmental Assessment
SIA	Social Impact Assessment
VIA	Visual Impact Assessment
WEF	Wind energy facility

1 Background to the Review

A review of the Visual Impact Assessment (VIA) of the proposed Albany Wind Energy Facility (WEF) was requested by Richard Summers Inc. Attorneys, acting on behalf of Kwandwe Private Game Reserve. The Albany VIA, hereinafter referred to as 'The VIA Report', was prepared by CES Coastal and Environmental Services (March 2020), and forms part of their Draft Environmental Impact Report (DEIR) that is out for public comment. The brief for the review included the following aspects:

- *Is the description of the receiving environment and the natural landscape adequate?*
- *Is the approach in the VIA to the analysis of view catchment area, view corridors, viewpoints and receptors accurate and relevant?*
- *Is the assessment of potential visual impacts in the VIA and their relative significance accurate, including lighting impacts at night?*
- *Is the description of alternatives, mitigation measures and monitoring programmes adequate and relevant?*
- *Is the VIA appropriately informed by an (1) accurate baseline survey of visual / scenic resources; and (2) appropriate mapping of landscape, scenic units, and viewsheds?*
- *Are the digital terrain modelling, visual simulations and photomontages used in the VIA accurate and relevant?*

2 Purpose of the Review

The purpose of this Review is to give an independent expert opinion on the adequacy and credibility of the VIA Report for the proposed Albany WEF project, in particular issues relating to the natural landscape setting, sense of place and wilderness quality of the area. A further concern expressed was the quality and accuracy of the VIA Report, given that it was prepared in-house by CES, and not by an independent visual specialist.

3 Assumptions and limitations

The Review did not involve any fieldwork or ground-truthing, and assumed that the VIA would include all the relevant information and baseline studies for the proposed WEF site on which to base an informed assessment. In addition, the Reviewers have access to a range of information sources, having worked on the original landscape assessments for all the wind and solar REDZs, in collaboration with the CSIR for the then Department of Environmental Affairs.

The Reviewers also studied the Heritage Impact Assessment (HIA), and Social Impact Assessment (SIA) for the Albany WEF, because of their inter-relatedness with respect to visual issues.

4 Definition of 'Visual'

For purposes of the review, the term 'visual' is intended to cover the broad range of visual, scenic, cultural, aesthetic and spiritual aspects of the natural and cultural landscape that contribute to the overall sense of place, (Oberholzer, 2005), as mentioned in the Introduction to the VIA Report.

The NHRA (1999) defines 'cultural significance' as aesthetic, architectural, historical, scientific, social, spiritual, linguistic and technological value or significance.

These definitions are important as they imply wider considerations than merely the GIS mapping of aspects such as visual exposure, visibility and visual absorption capacity.

5 The Role of a VIA

The Environmental Impact Assessment Regulations of 2014, Appendix 8, refers to specialist reports, which are required *inter alia* to include the following:

- *The sensitivity of the site (visual sensitivity in this case);*
- *Identification of areas to be avoided, including buffers;*
- *Assumptions, uncertainties and gaps in knowledge;*
- *Mitigation measures and monitoring for inclusion in the EMPr;*
- *An opinion as to whether the activity should be authorized; and*
- *Conditions for inclusion in the environmental authorization.*

In addition, the VIA is required to determine visual impact 'significance' in relation to the local or regional importance of the landscape features, the relative intactness of these, and the effect on the prevailing sense of place.

The VIA must provide a baseline study that identifies characteristics and constraints of the receiving environment in relation to the proposed WEF, including 'no-go' areas for development. These should inform the layout of the project along with mitigations to avoid or minimise potential visual impacts.

6 Comment on the Findings of the VIA Report

The conclusion of the VIA Report states the following:

"Overall, the visual impact of the Albany WEF is considered to be HIGH, mostly due to the potential impact on sensitive visual receptors such as nearby game farm and nature reserve operators who are of the opinion that highly visible wind turbines will have a negative impact on the remote sense of place of their operations which in turn will be less attractive to hunters and tourists. The study area has a large number of game farms, and there will be areas on these farms where wind turbines will intrude on views and viewpoints.

The Albany WEF will undoubtedly have a high visual impact on the landscape. However, this impact should be considered within the context of the following:

- *The wind farm will not be a permanent development (i.e. 20-25 years life span), after which the turbines and other superstructure will be removed on decommissioning;*
- *The landscape can be restored through rehabilitation after decommissioning;*
- *Although limited, certain recommended measures can be implemented can mitigate the*
- *impacts to some extent;*
- *The landscape of the study area is not pristine or of very high scenic value; and*
- *The wind farm is partially situated within and adjacent to a Renewable Energy Development Zone (REDZ 3 - Cookhouse) and adjacent to the already approved Grahamstown Wind Farm.*

It is concluded that although the potential losses of scenic resources are high, this does not represent a fatal flaw."

These conclusions are questionable for the following reasons:

- The 20 to 25 years lifespan of the wind farm is considered to be 'long term' in accepted EIA terminology. In addition, there is no guarantee that the turbines would be removed at the end of that period. Renewable energy will be required just as much into the future, and the trend at older established wind farms is for the turbines to be replaced by larger, more efficient ones. This could occur where approvals for a wind farm on the site have been previously granted. It is therefore possible that the landscape will not be restored, unless there is a significant switch in energy technology.
- The fairly minor mitigations provided in the VIA Report, along with the admission that little can be done to screen turbines, given their large size, means that little or no mitigation would occur. On the other hand, the preferred mitigation of avoiding no-go areas and areas of high visual sensitivity of the site are not considered in the VIA Report.
- The statement that "the landscape of the study area is not pristine or of very high scenic value" lacks credibility. Although parts of the site itself can be seen as a cultural landscape, altered over time by agriculture, the areas surrounding the site, particularly to the north, have both high scenic and wilderness value, which would be directly affected by the wind farm, and the negative impact of which is not considered in the VIA Report. The scenic resources of the area can be experienced from both the N2 and R67 travelling north and east from the site and from various game farms to the north of the site. The numerous comments received during the public participation attest to the high value placed on these scenic resources, which have not been mapped in the VIA Report. In apparent self-contradiction, the VIA Report states that "the potential loss of scenic resources is high". The credibility of the Report is therefore a concern.
- The proposed wind farm is partially (about 20%) situated within the Cookhouse REDZ. A cursory examination of the REDZ visual mapping at the regional scale would have

revealed that the relevant portion of the REDZ is categorised as 'very high visual sensitivity' and therefore not ideally suitable for wind farm development. (See Maps 1 and 2 attached). There is limited evidence that any proper screening was carried out to avoid visually sensitive areas at project level of the assessment.

Given the above considerations, the final conclusion in the VIA Report that the proposed wind farm "does not represent a fatal flaw" is highly subjective and is contradicted by the finding that "the potential loss of scenic resources is high". This is confirmed by the evidence put forward in this Review. It was found during this Review that large portions of the wind farm could potentially represent a fatal flaw according to the visual sensitivity maps attached to the Review. (See Maps 3 to 18, attached).

7 Peer Review of the Visual Impact Report

Presumably, because the VIA was conducted in-house by CES, an external peer review report was obtained from LOGIS (March 2020). In the letter from the Reviewer, only the following paragraphs are devoted to the 'review':

"Please note: the peer reviewer received the VIA report at a very late stage in the process and has had very limited time to produce this peer review report.

Having stated the limitations of the time allowed for this desktop review, the reviewer is of the opinion that the VIA report have generally adopted a methodology that was sound and in line with best practice. The view sheds generated appear accurate and most mitigation measures recommended are sensible, practical and appropriate to the nature and scale of the proposed development. Additionally direct (primary), indirect (secondary) and cumulative impacts were considered and addressed.

The reviewer is generally in agreement with the significance of the visual impacts as stated within the VIA, but may require an additional opportunity and sufficient time to make specific recommendations regarding additions or alterations to the report, or whether the proposed development is acceptable in nature or fatally-flawed."

In other words, no reliance can be placed on the peer review as the author admits he did not have time to make recommendations, nor was he able to determine whether the proposed development is acceptable or fatally flawed. This means that the findings of the peer review are not credible and cannot be taken into account.

8 Site Verification

In terms of Draft Government Notice No. 648, dated 10 May 2019, there is a requirement that an Initial Site Sensitivity Verification Report be produced for a development footprint. The purpose of the Site Verification is that the report confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool.

For ease of reference, the Landscape Theme (visual and scenic resources) for the Cookhouse REDZ is attached (Map 1). The intention is that the Map serves as a screening tool, and that more detailed mapping at a local scale for a specific site could have confirmed or disputed the REDZ mapping.

9 Additional Comment on the VIA Report

A number of omissions and inaccuracies in the VIA Report, are identified and commented on below:

- *Baseline Description:*

Pages 21-24 of the Report include a generalized description of the affected physical environment, but provide little indication of the specific landscape features and scenic resources of the site and immediate surroundings, which would be required to inform the evaluation of visual impacts and which should also inform the layout of the proposed wind farm. For example, steep slope gradients, some of which are steeper than 1:4, have not been indicated in the Report. The location of wind turbines, each with laydown areas of 3 900m² and 14m wide access roads (during construction), on steep slopes would require cut slopes of 6m or more. This could result in potential erosion and visual scarring of the landscape. Similarly, other visually sensitive landscape features, such as wetlands, nature reserves and scenic routes have not been mapped, nor does the Report include a 'visual sensitivity map' for the site and surrounds. The 'Specialist Checklist' in the NEMA regulations stipulates the following as a requirement:

"a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site (visual in this case), including areas to be avoided, and including buffers".

- *Visual Receptors:*

Page 25, Figure 6 indicates "all potential visual receptors within 20km of the proposed turbines" but this is not correct. Using available data provided by SANBI and SAPAD, a number of other game farms and guest houses (not identified in the VIA Report) in proximity to the proposed wind farm were identified by the Reviewers, as indicated on Maps 10 and 11, attached. The potential visual impact on these should have been included in the VIA, and visual buffers applied to minimise impacts. Other than a nominal 500m buffer around turbines, no visual buffers to minimise visual impact on receptors have been considered in the VIA Report.

- *Observer Points:*

Page 27, Figure 7 indicates the position of 7 selected observer viewpoints, mainly from the N2 and R67. Besides being an unusually small number of viewpoints which

compromises the credibility of the VIA, it misses numerous game farms and guest houses that would be affected by the proposed wind farm. Comment received from sensitive viewers, as part of the public participation, should have provided an indication of critical viewpoints that needed to be included. The result is that the visual montages provided on pages 28 to 34 of the VIA Report do not provide an adequate or credible representation for assessing potential visual impacts. In addition, no night views were provided, despite this having been one of the identified visual issues, which is a material omission.

- *Visual Simulations:*

Pages 28 to 34 of the VIA Report include 3D visual simulations from the viewpoints mentioned above. These have been checked by the Reviewers and appear to be relatively accurate. However, as indicated above, numerous sensitive receptors were not included in the range of selected viewpoints, with some of the simulations being too distant to provide a good or accurate representation. Except for a conceptual example, no visual simulations of the lights at night from viewpoints are provided, which is unusual given the importance of the wilderness experience and dark skies at night, highlighted in the comments made by the many game farm receptors in the immediate area. The Reviewers tested a number of viewpoints inside the Kwandwe Game Reserve and it was found that a number of turbines would be clearly visible both during the day and at night from lodges (e.g. KwaNdlovu, Fort House) at 13km distance. Other scenic viewpoints within the Reserve are only about 6km away, while the boundary of the Reserve is immediately adjacent to the proposed wind farm.

- *Viewshed:*

Page 37, Figure 15, of the VIA Report indicates the viewshed for the 66 proposed wind turbines. The viewshed delimitation has been checked by the Reviewers and appears to be accurate. However, the scale of the map is too small to determine the effect on sensitive receptors such as guest houses and farmsteads, some of which are not even indicated on any of the maps. A second viewshed with a colour gradation based on distance from the turbines would have enabled receptors to determine the level of visibility from critical viewpoints, and should have been provided.

- *Viewing Distances:*

Page 39 of the Report states that Makhanda (Grahamstown) is located approximately 5km to the south-west of the proposed wind farm. This could be misleading, as according to available maps, the nearest turbine is in fact 1,25km from the edge of the urban area. The recommended visual buffer for towns is 2km (see Table 1 and Map 12).

- *Visual Intrusion:*

Page 45 of the Report states that motorists using the N2 and R67 "are generally classified as LOW sensitivity visual receptors". This seems to ignore the importance of these visual corridors, used by hundreds of users (commuters and tourists) each day, as well as the fact that certain stretches of these routes, which have passes, or run along crests, with high scenic value have not been assessed in the VIA report. Scenic stretches, notably to the north and east of the site that will be impacted, have been identified by the Reviewers (see Maps 14-16 attached).

- *Sensitive Receptors:*

Page 56 of the Report states that "there are very few sensitive receptors within 5km of the powerline corridor". The overall visual impact significance for the 132kV powerline, switching stations and substation is given as LOW, despite the fact that these are close to the N2 and Beggar's Bush Nature Reserve, while the temporary laydown area / construction camp is inappropriately located right next to the N2. The N2 National Road (used by commuters and tourists), Beggar's Bush Nature Reserve and farmsteads need to be regarded as sensitive receptors. It is clear that the visual intrusion of switching stations and substations, along with all the transformers and battery storage have not been adequately considered, nor any meaningful mitigations, such as visual buffers or screening provided.

- *Visual Mitigations:*

Pages 51 to 58 of the Report include a number of mitigations for the various components and phases of the proposed project. These tend to be of a minor remedial nature rather than an avoidance measure. It is incumbent on visual specialists to first employ avoidance measures, which are more effective in reducing potential visual impacts, and which has not been done in the Report. This would ideally occur at the early screening stage of the project to inform the layout of the wind farm. An example would be the use of visual buffers around special landscape or scenic features and sensitive receptors, based on levels of visual sensitivity, including 'no-go' zones, such as those in Table 1, Paragraph 10 below.

- *Environmental Management and Monitoring:*

Other than the construction phase mitigations on Page 51, no other environmental management and monitoring programmes are provided in the Report, as required in the NEMA Specialist Checklist.

- *Visual Impact Significance Ratings:*

The Reviewers are in agreement with the impact significance rating for wind turbines (Operational Phase), which is stated as being HIGH both before and after mitigation. The Reviewers are not in agreement with the LOW significance rating for the powerline and

switching / substations located adjacent to the N2 National Road, because of the visual intrusiveness at close range to a major national route by these industrial-type facilities, particularly as no visual buffers or screening mitigations have been provided. The Reviewers question the MODERATE rating for lights at night, given that the red lights are more visible at a distance than during the day, particularly in a wilderness setting. (See Figure 1 below).

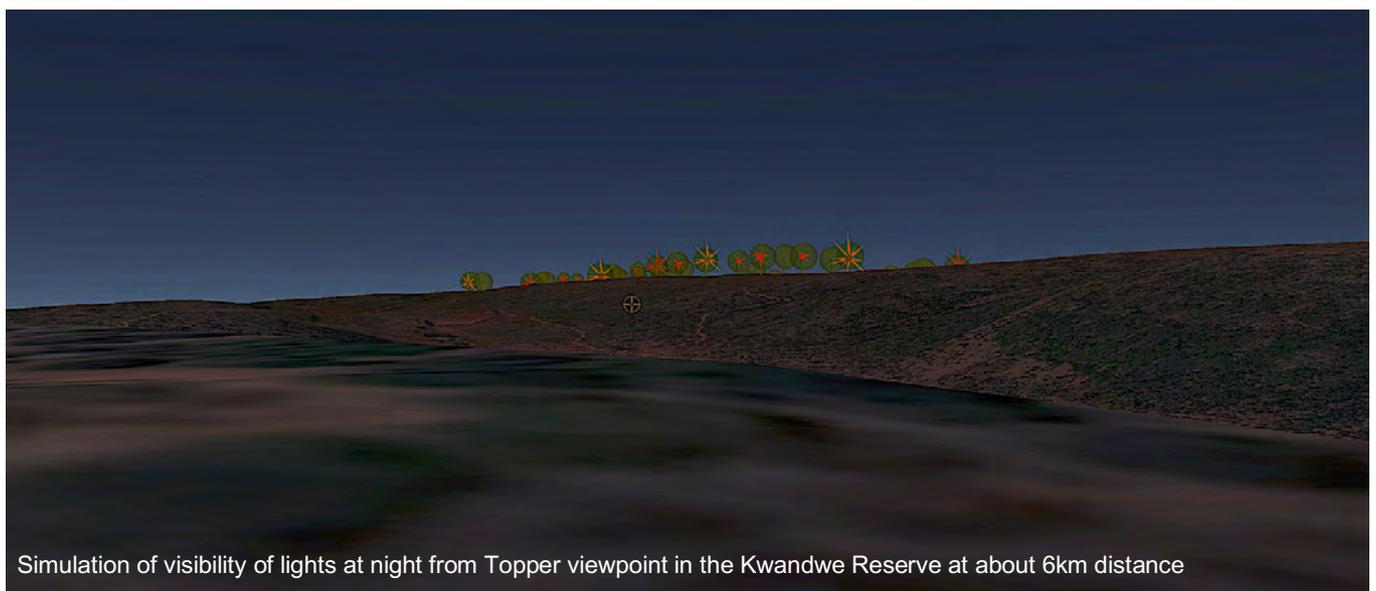


Figure 1: Visual simulations of potential impact of navigation lights at night seen from the Kwandwe Private Game Reserve, which indicate a worst case scenario, as the lights would need to be determined by the CAA.

10 Visual Sensitivity Mapping

A major concern in this review has been the absence of site-specific visual sensitivity mapping as part of the VIA Report. To this end the Reviewers have provided a series of maps aimed at making a more informed assessment of the visual implications of the proposed wind farm, including potential 'no-go' areas, which are summarised in Map 18 attached. It should be stressed that this mapping involved a desktop study and would need to be ground-truthed.

The visual sensitivity mapping is based on recommended visual buffers, derived from the Wind and Solar SEA (CSIR, 2015), as indicated in Table 1 below. These are not intended to be mandatory, but instead provide a useful guide in line with best practice. The buffers would be moderated by site-specific conditions, such as instances where receptors are in a view shadow.

Table 1: Visual sensitivity categories with recommended visual buffers

Scenic Resources/ Sensitive receptors	No-go areas	High visual sensitivity	Medium visual sensitivity
Topographic features, ridges, scarps	Feature	0-250m	-
Steep slopes	Slopes > 1:4	Slopes > 1:10	-
Water features, wetlands, dams	0-250m	250-500mm	-
Heritage sites Grade I and II	Feature	0-500m	500m-1km
Heritage sites Grade III	Feature	0-250m	250-500m
Nature Reserves	0-3km	3-5km	5-10km
Private reserves/ guest farms	0-1,5km	1,5-3km	3-5km
Game farms (site boundary)	0-1km	1-2km	2-3km
Farmsteads outside the site	0-500m	500m-1km	1-2km
Settlements / towns	0-2km	2-4km	4-6km
Provincial / arterial route	0-500m	500m-1km	1-3km
Scenic routes	0-1km	1-2,5km	2,5-5km
National road	0-1km	1-2,5km	2,5-5km
Small airfields	0-3km	-	-

11 Conclusion and Recommendations

The Reviewers are of the opinion that the VIA Report contains too many omissions and inaccuracies, to warrant an informed recommendation regarding the visual acceptability of the proposed wind farm. The desktop mapping by the Reviewers indicates that parts of the wind farm layout are clearly problematic from a visual perspective, resulting in a potential fatal flaw for the wind farm application.

Given the scale of the wind turbines, laydown areas and related infrastructure, the most meaningful visual mitigation would be visual buffers, which would involve the relocation or removal of turbines in visually sensitive positions. Certain wind turbine locations, such as those on steep slopes, are patently unsuitable and would constitute a fatal flaw.

It appears that inadequate visual screening was undertaken at an early stage of the project, using both the Cookhouse REDZ regional mapping as well as more site-specific, project-level visual sensitivity mapping.

In summary:

- The description of the receiving environment is inadequate;

- The analysis of view corridors, viewpoints and sensitive visual receptors is incomplete and inaccurate in some cases;
- The assessment of potential visual impacts and their significance is disputed, based on the evidence of this review, while the impact of lighting at night from specific viewpoints has not been addressed in the VIA Report;
- The mitigation measures do not consider avoidance measures at all and no monitoring programme has been provided;
- The VIA is not adequately informed by essential baseline information, including visual and scenic resource mapping at the project scale;
- The visual simulations / photomontages are relatively accurate, but too few in number and coverage from sensitive viewpoints, to meaningfully inform the visual assessment.

The Reviewers believe that part of the problem stems from the VIA being conducted in-house by CES, instead of by an independent visual specialist, with no opportunity afforded for an in-depth and independent peer review of the VIA Report.

It is therefore recommended that the current VIA Report in its present form be set aside, based on the findings of this Review, and the fact that it does not meet all the requirements of NEMA and the EIA regulations for impact assessments.

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Booth Heritage Consulting, January 2020. Phase 1 Archaeological Impact Assessment: Proposed Albany Wind Energy Facility and Associated Infrastructure, near Grahamstown, Eastern Cape.

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LOGIS, March 2020. Peer Review of Visual Impact Assessment Report.

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Statement of Independence

The Reviewers declare that they are independent practitioners with expertise and wide experience in visual impact assessments, that the review has been carried out in an objective manner and complies with the relevant EIA regulations, and that all material information in their possession, which may influence a decision by the competent authority and the objectivity of the review, has been disclosed.

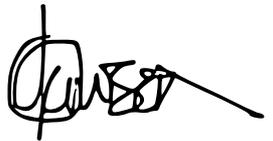


Bernard Oberholzer Landscape Architect

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(SACLAP) Reg. no. 87018



Quinton Lawson Architect

Professional member of the SA Council for the Architectural Profession

Member of the Cape Institute for Architects and SA Institute of Architects.

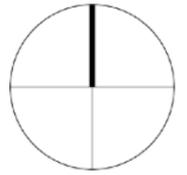
(SACAP), reg. no. 3686.

Expertise:

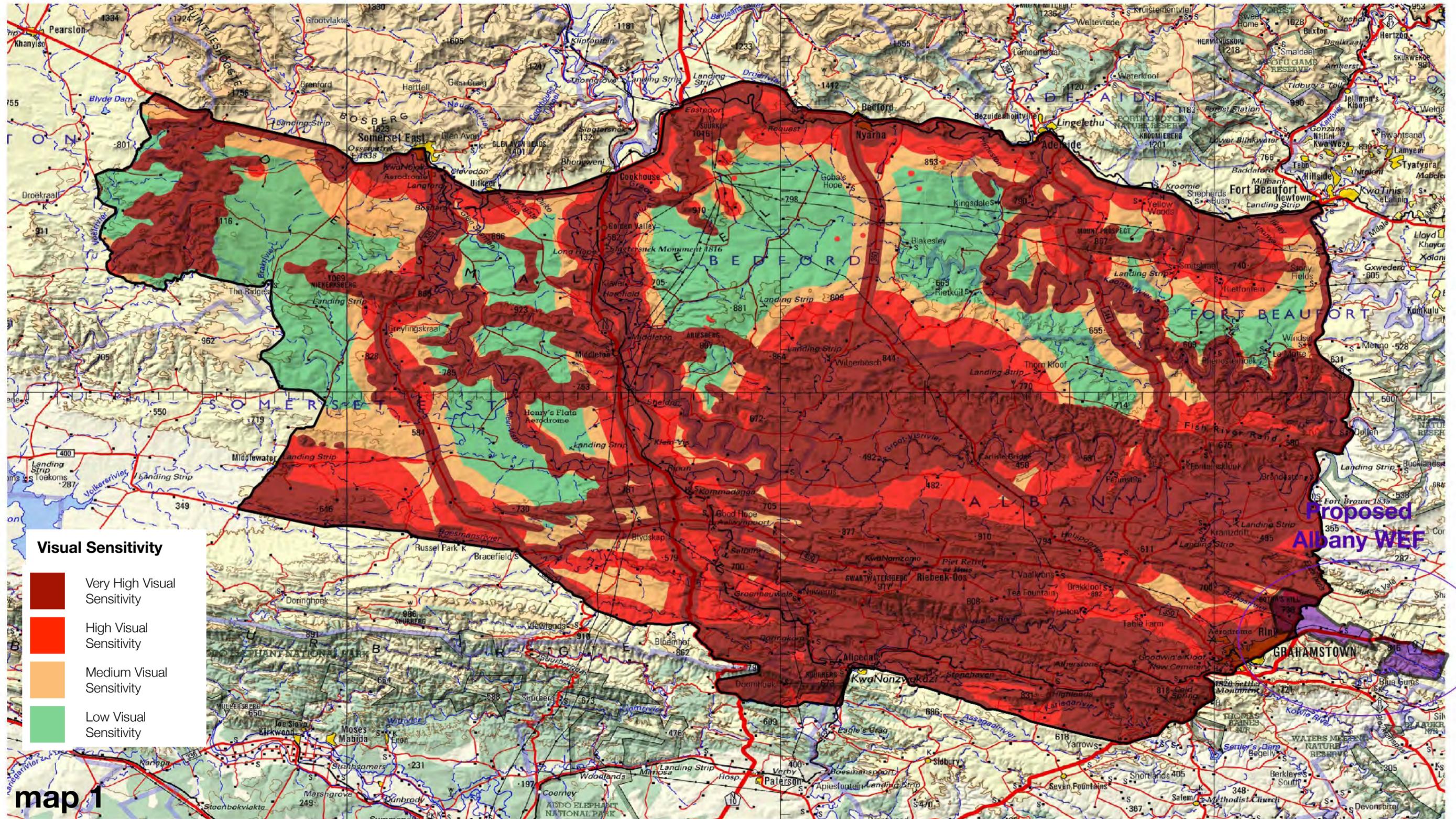
Bernard Oberholzer has a Bachelor of Architecture (UCT) and Master of Landscape Architecture (U. of Pennsylvania), and has more than 25 years of experience in undertaking visual impact assessments. He has presented papers on *Visual and Aesthetic Assessment Techniques*, and is the author of *Guideline for Involving Visual and Aesthetic Specialists in EIA Processes*, prepared for the Dept. of Environmental and Development Planning, Provincial Government of the Western Cape. He co-authored the 'Landscape Assessment' Report for the *National Wind and Solar PV Strategic Environmental Assessment*, in association with the CSIR, for the Department of Environmental Affairs in 2014.

Quinton Lawson has a Bachelor of Architecture (Natal), and has practiced as a professional architect since 1978, specialising in architectural and urban design, environmental design and computer visualisation. He was a senior partner at MLB Architecture and Urban Design, with specialist expertise in visual modelling and design solutions. He was in the past a visiting lecturer at UCT teaching a post-graduate course on Computer Techniques in Landscape Architecture, including visualisation and visual assessment techniques, and has previously served on the Impact Assessment Review Committee of Heritage Western Cape.

Together, they prepared the 'Landscape/Visual Assessment' report for the *National Wind and Solar PV Strategic Environmental Assessment*, as well as for the *National Electricity Grid Infrastructure SEA* in association with the CSIR, for the Department of Environmental Affairs in 2014-2015.



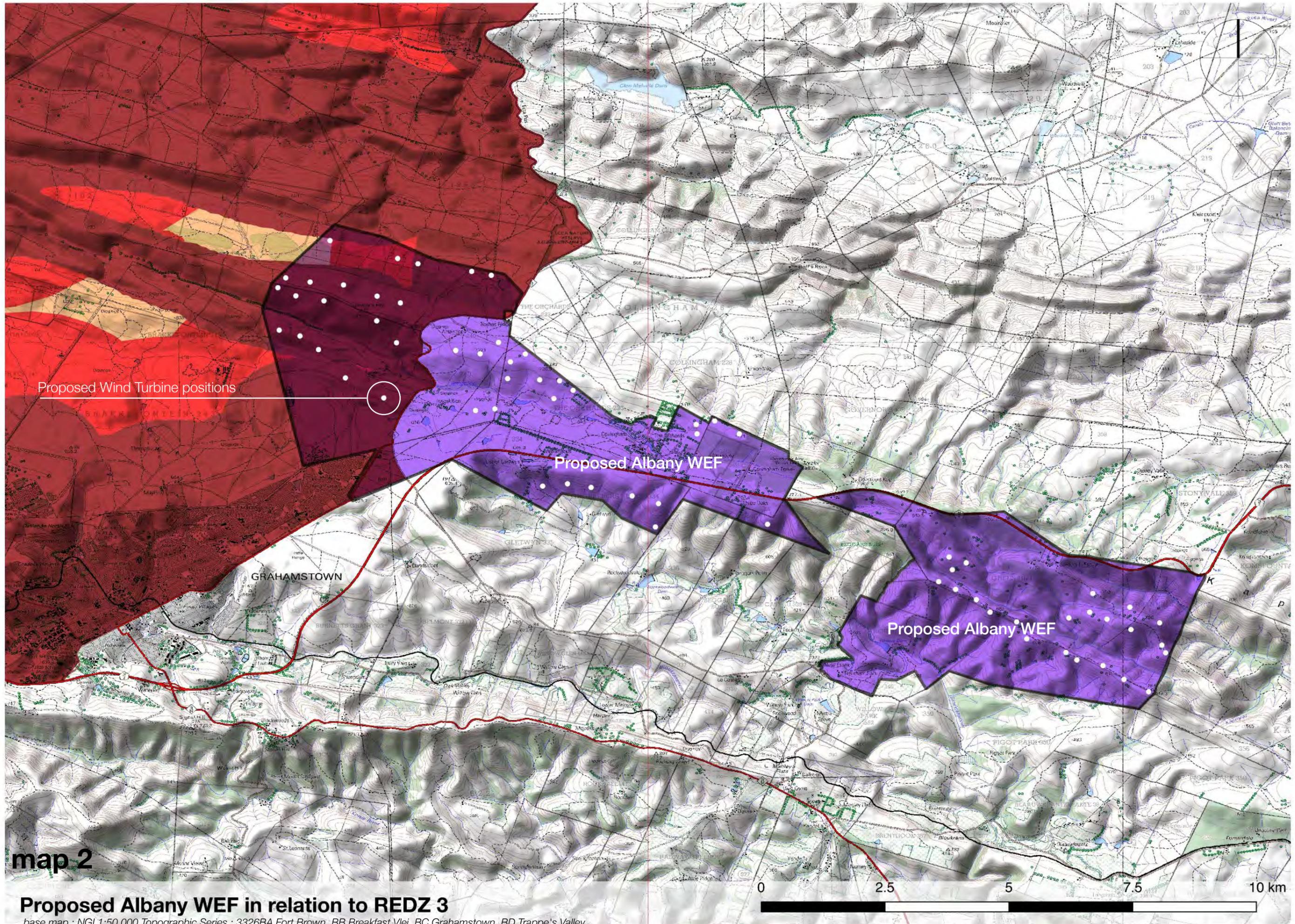
source : Wind and Solar PV Strategic Environmental Assessment, Cookhouse REDZ 3, CSIR 2015.



REDZ 3 • COOKHOUSE : Visual Sensitivity

base map : NGI 1:250 000 Topo-cadastral Series : 3326 Grahamstown





Proposed Wind Turbine positions

Proposed Albany WEF

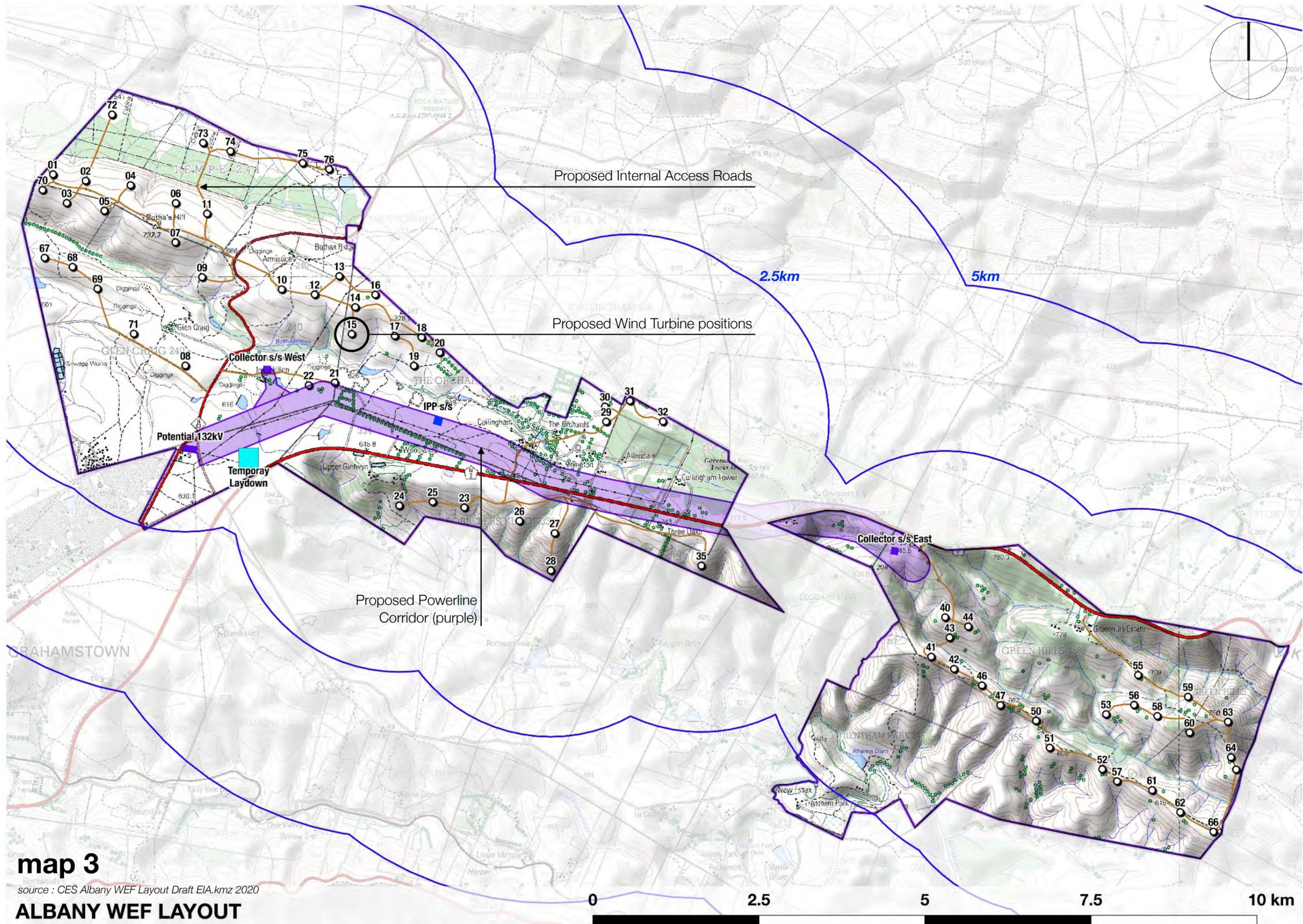
Proposed Albany WEF

map 2

Proposed Albany WEF in relation to REDZ 3

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



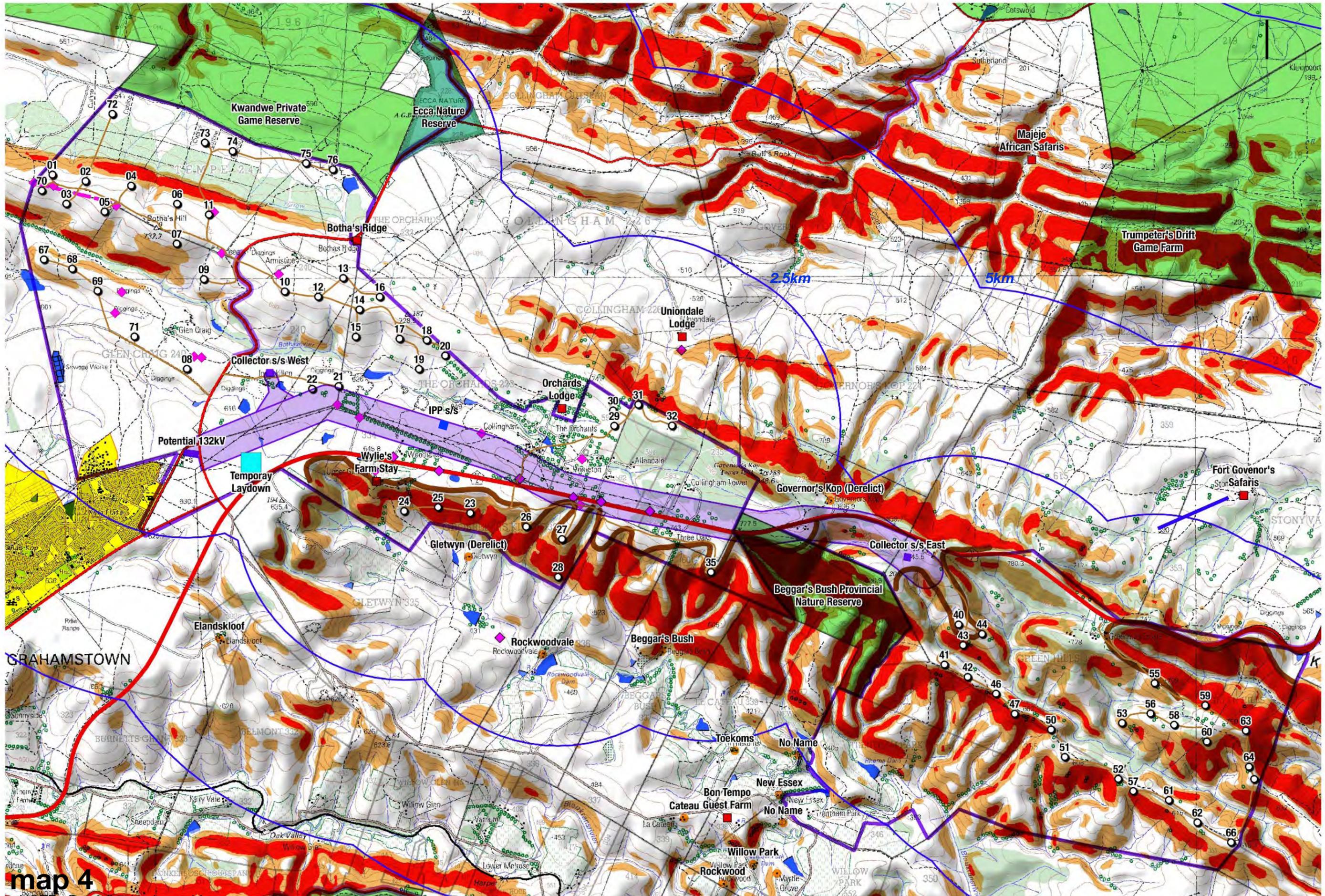


map 3

source : CES Albany WEF Layout Draft EIA.kmz 2020

ALBANY WEF LAYOUT

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



map 4

NOTE : See following legend for sources

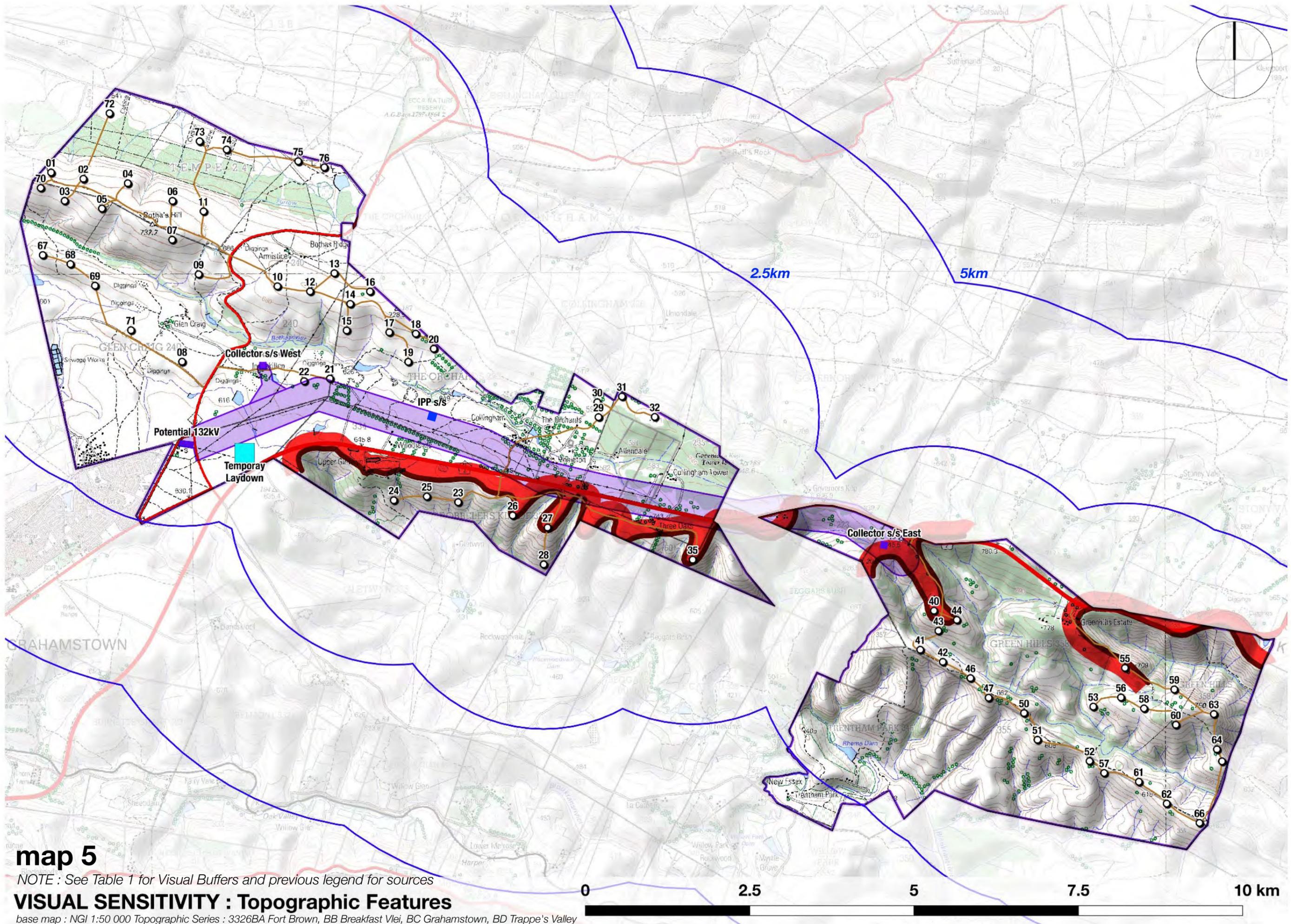
ALBANY WEF • VISUAL FEATURES

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

Visual Features Legend :

Source :

	Topographic Features, Ridge-lines	<i>derived from 1:50 000 NGI Topographic Series</i>
	1:4+ Slopes (red) 1:10 - 1:4 Slopes (orange)	<i>derived from NGI 5m contour data</i>
	Water Features, Farm Dams	<i>SANBI NFEPA Wetlands data 2017</i>
	Heritage Sites Grade I, II and III	<i>SAHRA Heritage Site Inventory Dec 2017 Phase 1 Archaeological Impact Assessment: Proposed Albany WEF, C. Booth Jan 2020</i>
	Nature Reserves, Protected Areas	<i>DEFF SAPAD Database OR Q4 2019</i>
	Private Reserves, Game Farms	<i>SANBI Private Reserves, Game Farms, Conservancies 2018</i>
	Guest Farms, Game Farm Lodges	<i>derived from Google Earth Aerial imagery Dec 2018, Google Map Data 2020</i>
	Settlements, Towns	<i>derived from Google Earth Aerial imagery Dec 2018</i>
	Farmsteads	<i>derived from Google Earth Aerial imagery Dec 2018, 1:50 000 NGI Topographic Series</i>
	Arterial Routes	<i>Open Street Map Roads Categorised Data 2019</i>
	Scenic Routes	<i>interpreted from Open Street Map Roads Data 2019, Google Earth Aerial and Street View Imagery 2014/2018, 1:50 000 NGI Topographic Series</i>
	National Road	<i>Open Street Map Roads Categorised Data 2019</i>
	Small Airfields	<i>CAA Database 2018, Google Earth Aerial Imagery Dec 2018</i>

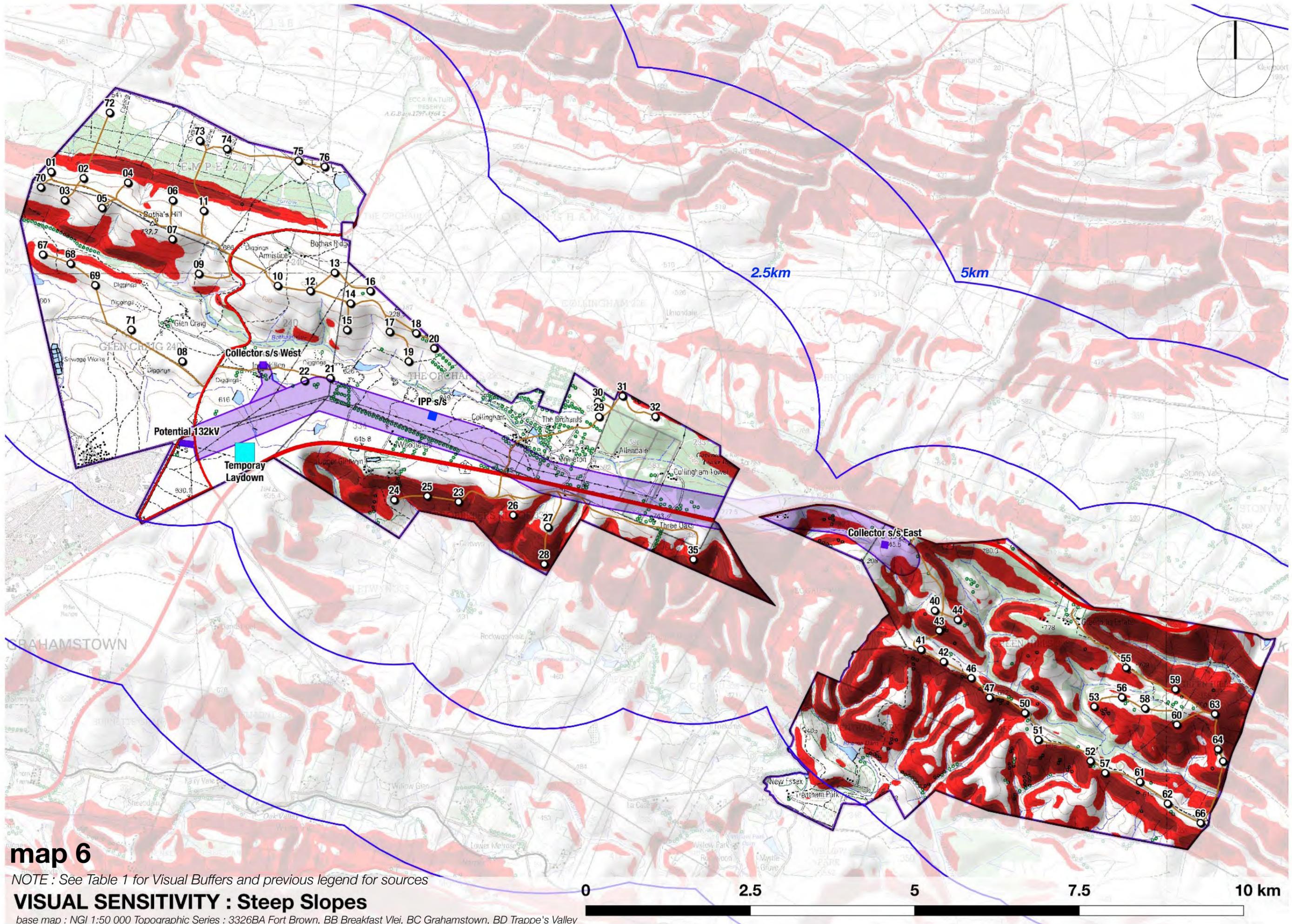


map 5

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Topographic Features

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

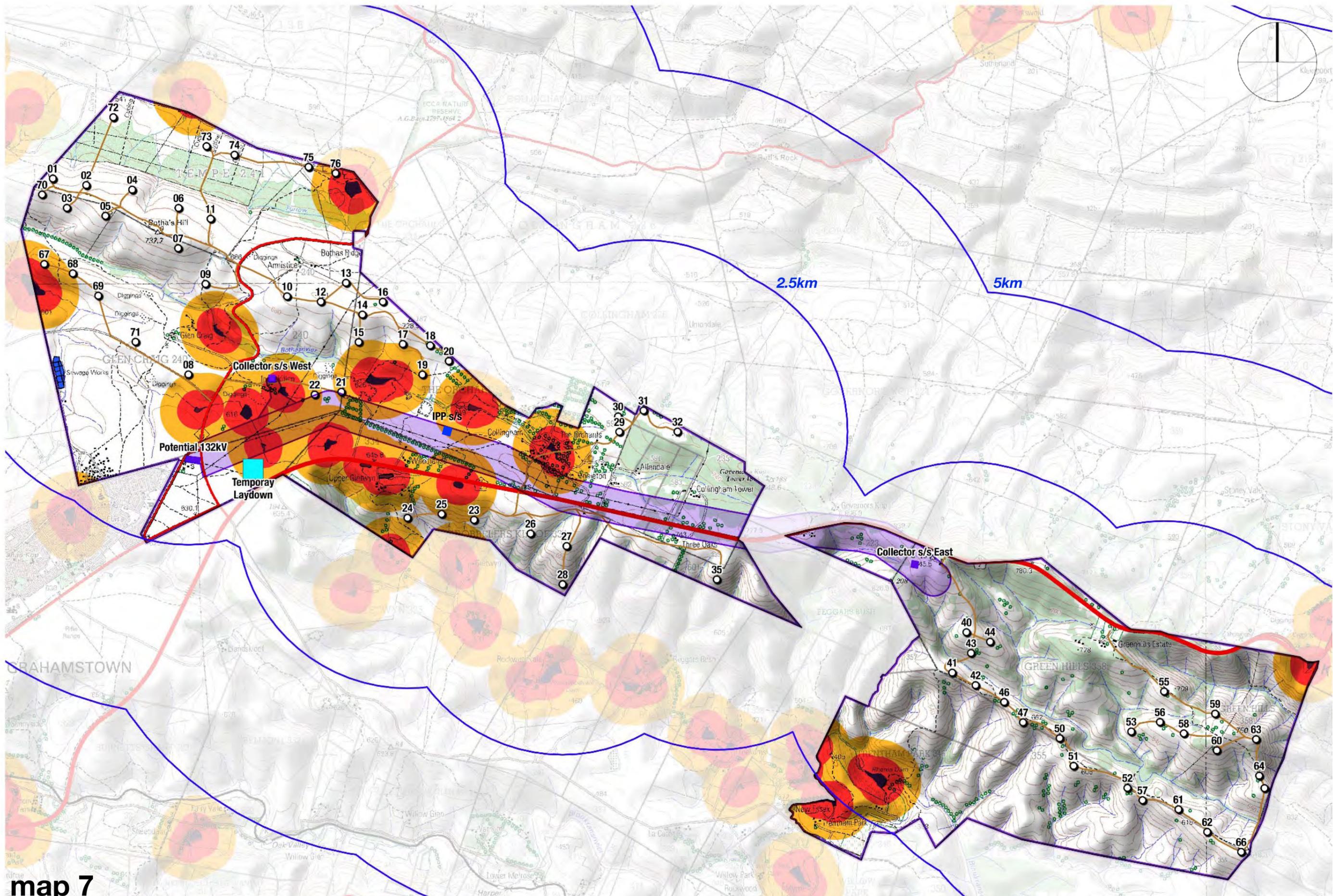


map 6

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Steep Slopes

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

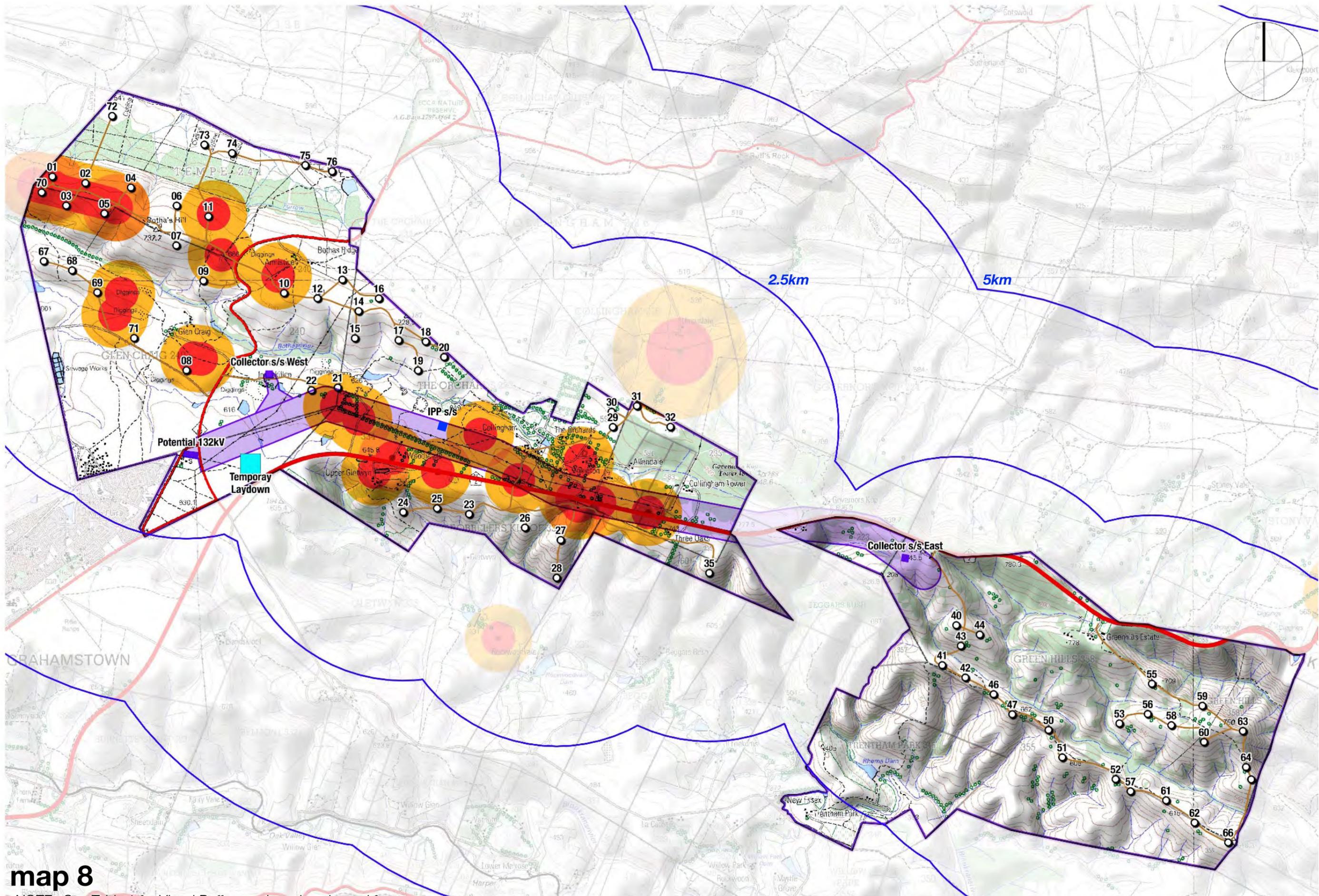


map 7

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Water Features, Wetlands, Dams

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



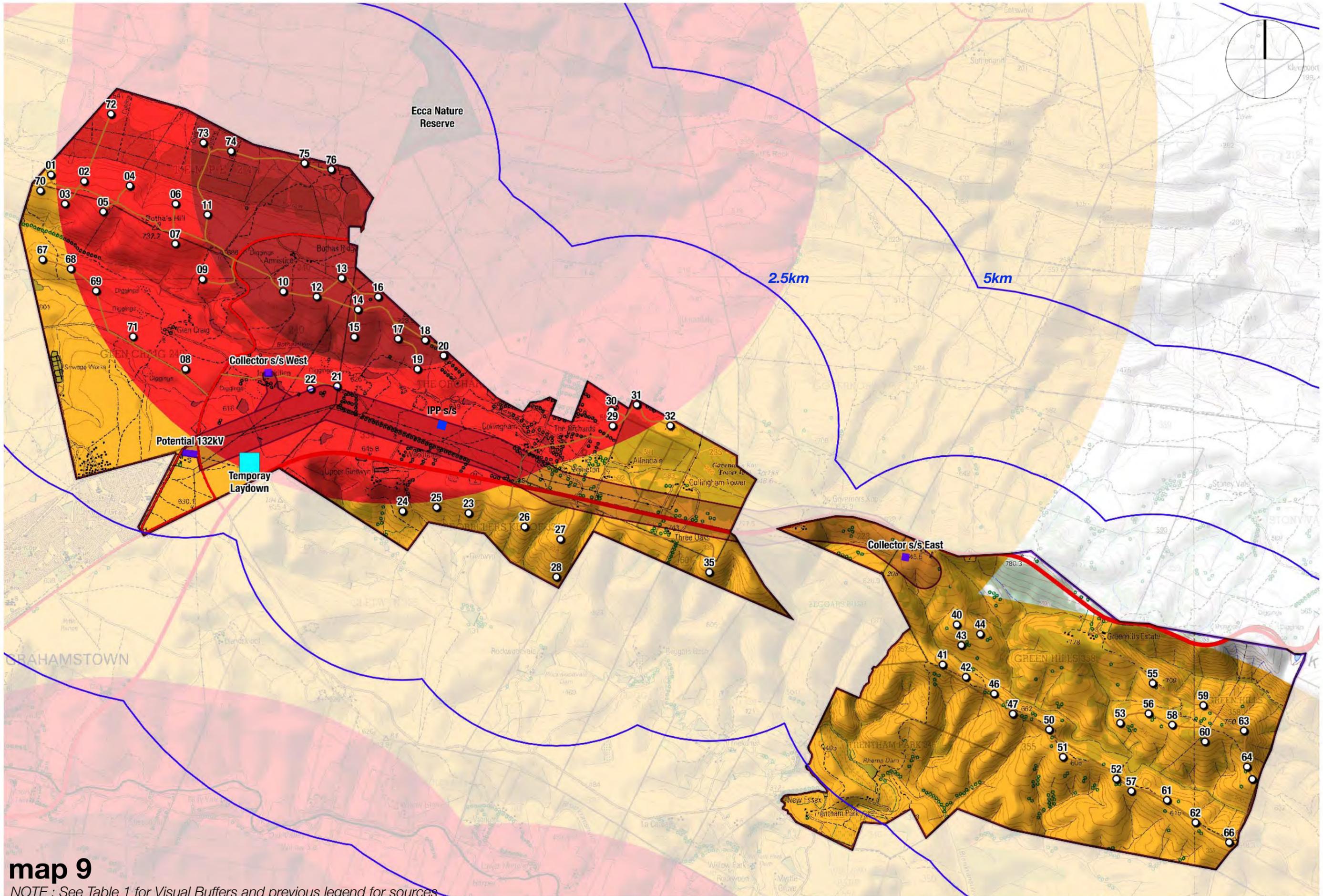
map 8

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Heritage Sites Grades I, II & III

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



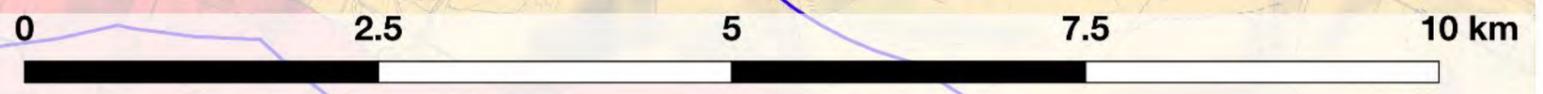


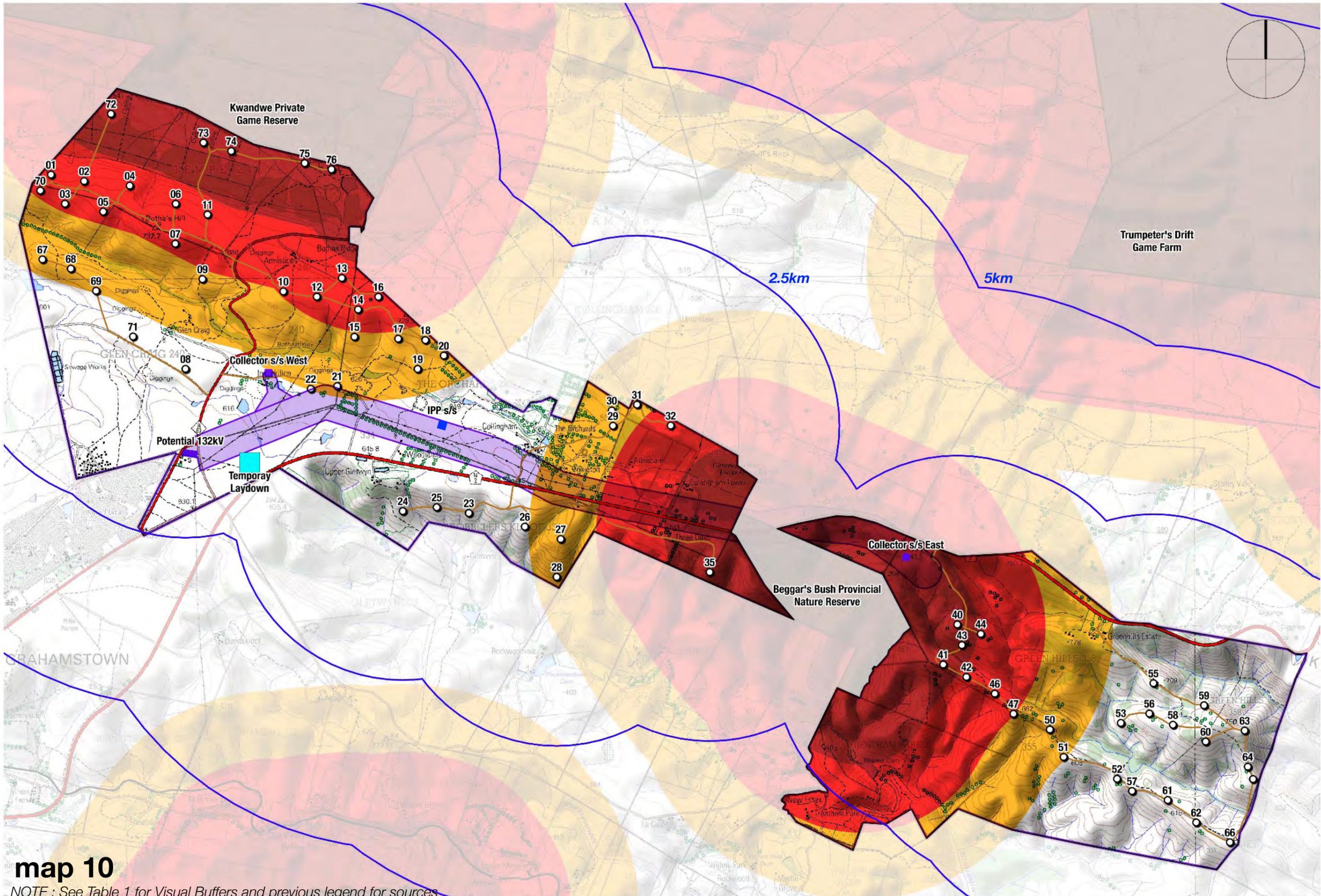
map 9

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : SAPAD Nature Reserves

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley





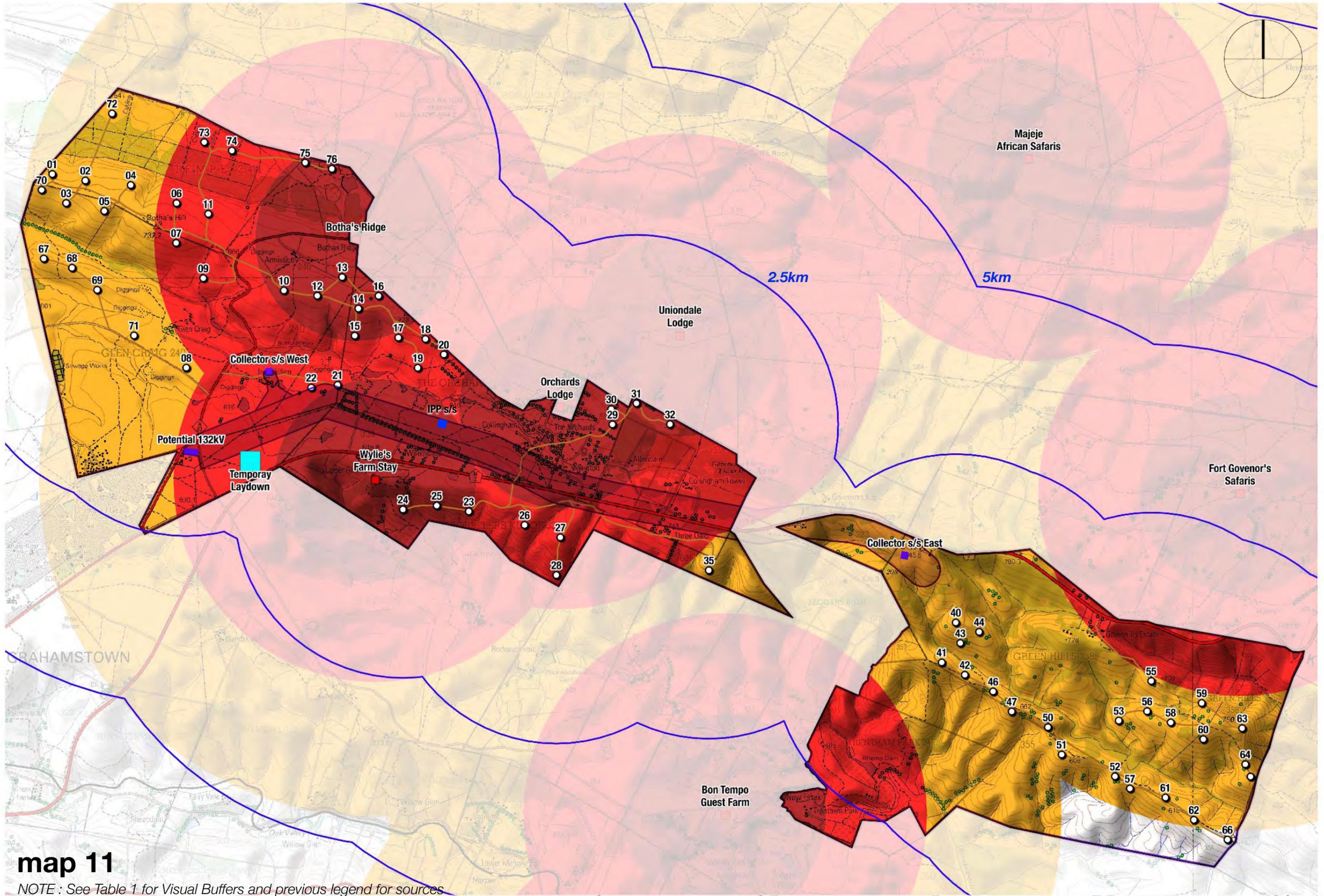
map 10

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : SANBI Provincial Reserves,

Game Farms

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



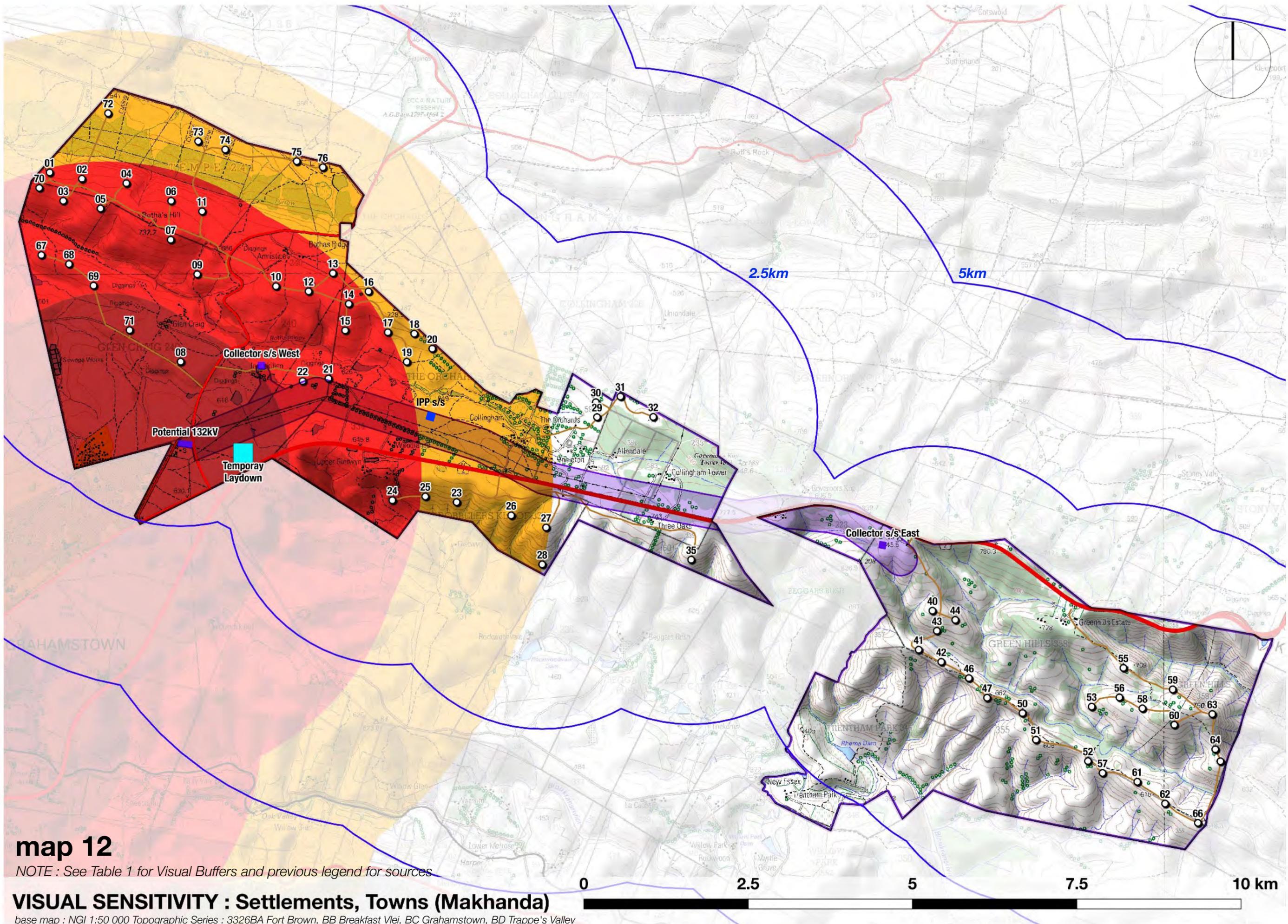
map 11

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Guest Farms, Game Lodges

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



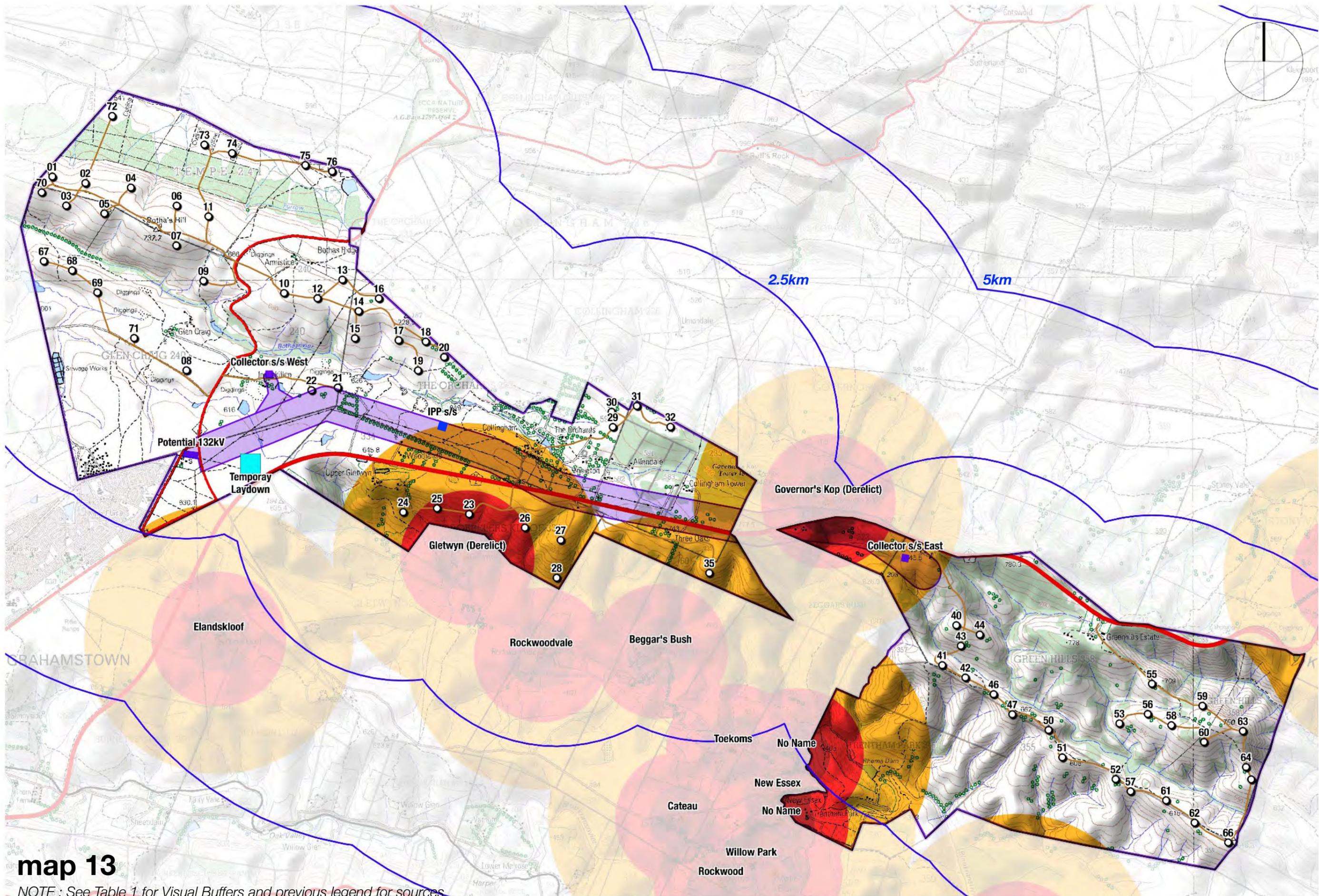


map 12

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Settlements, Towns (Makhanda)

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

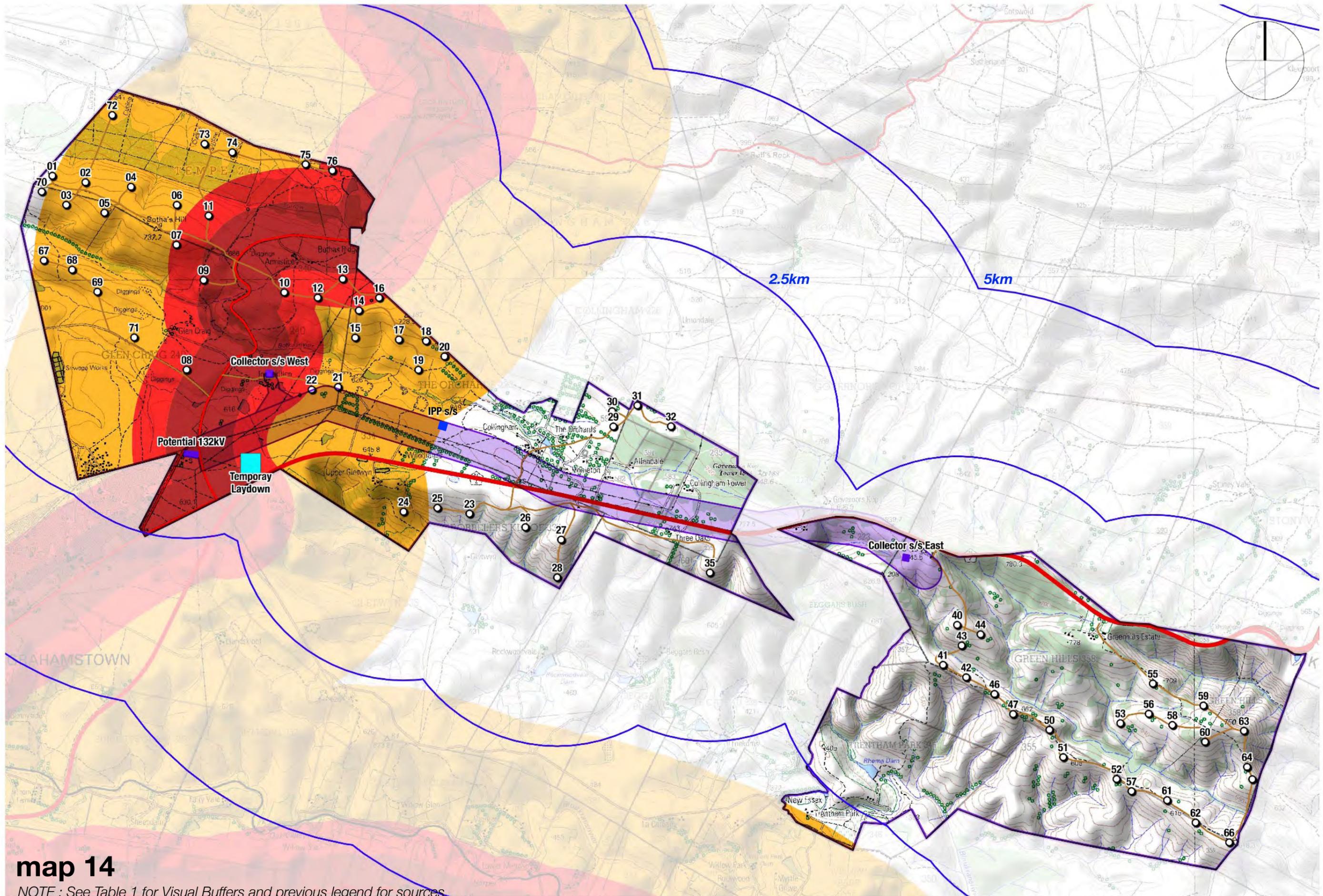


map 13

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Farmsteads (OUTSIDE Site)

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

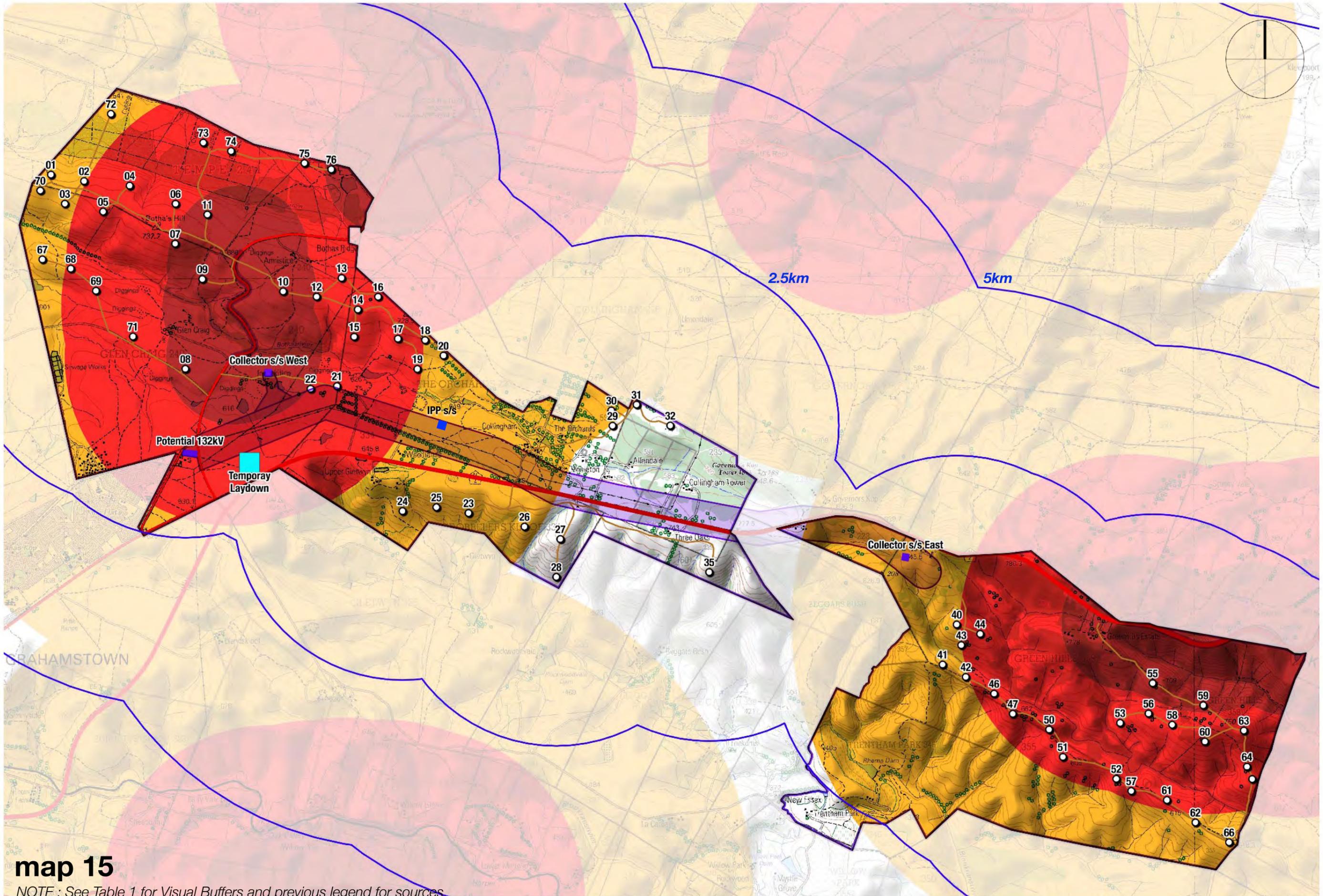


map 14

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Provincial / Arterial Routes

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



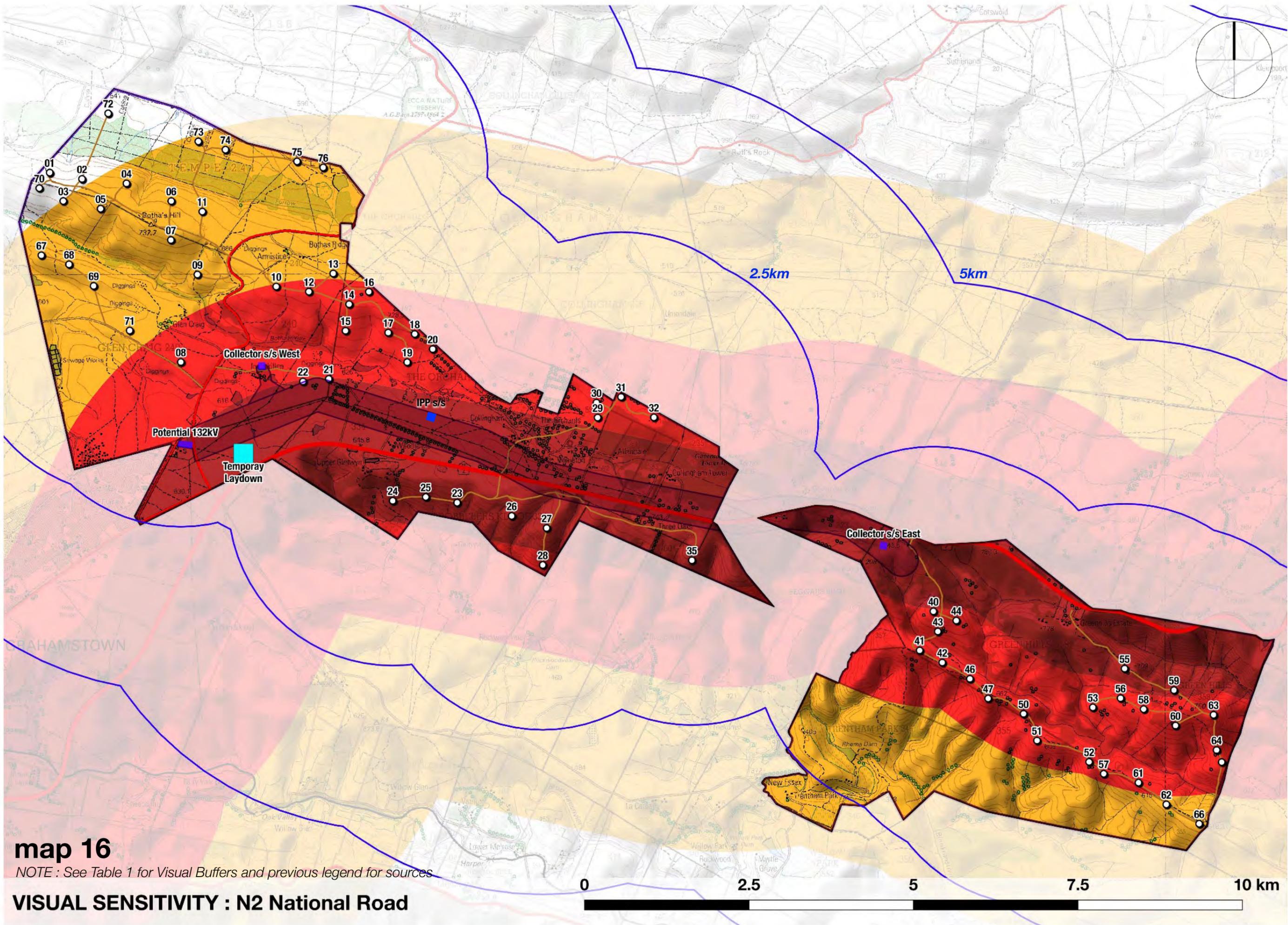
map 15

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Scenic Routes

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



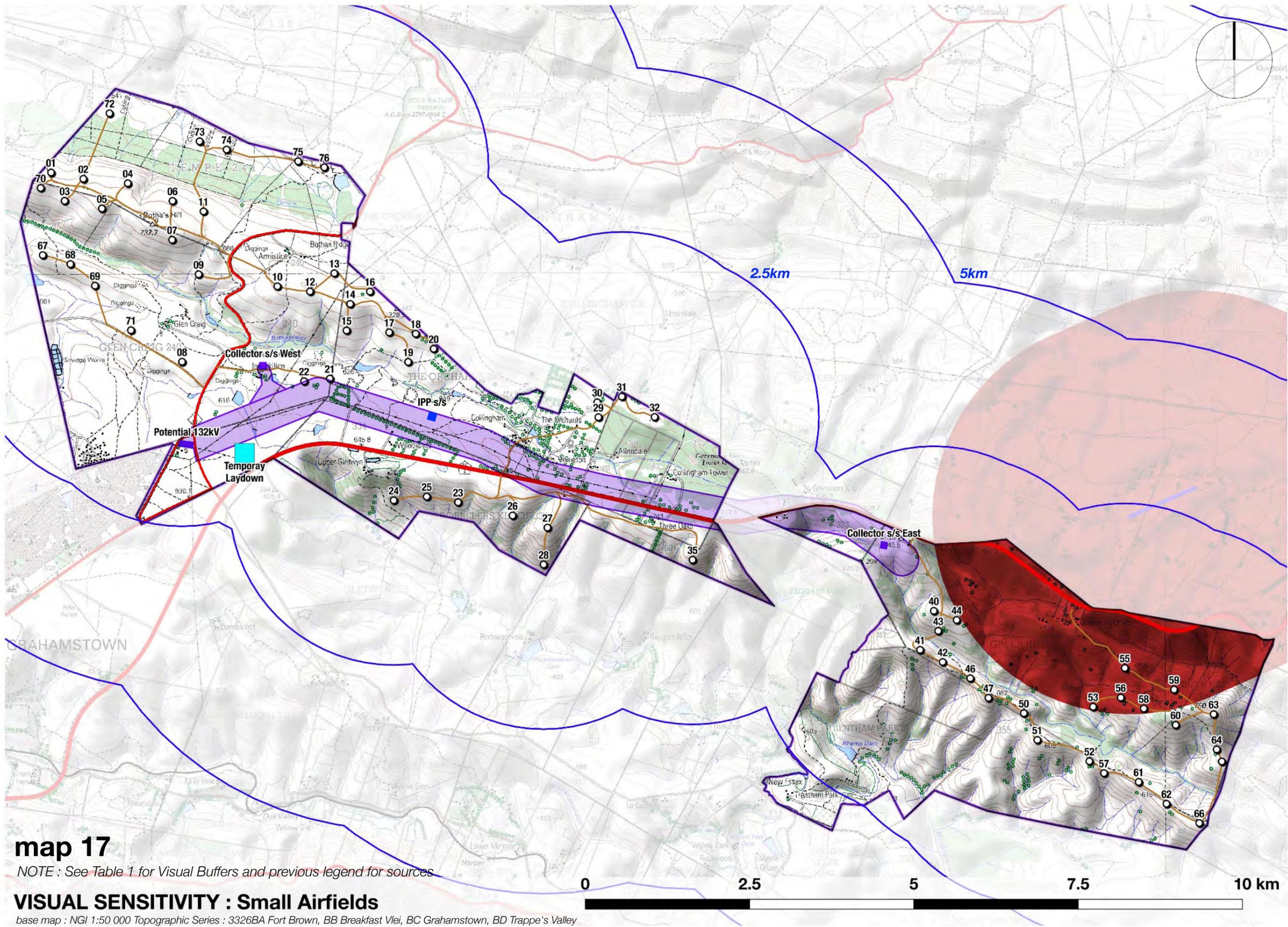


map 16

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : N2 National Road



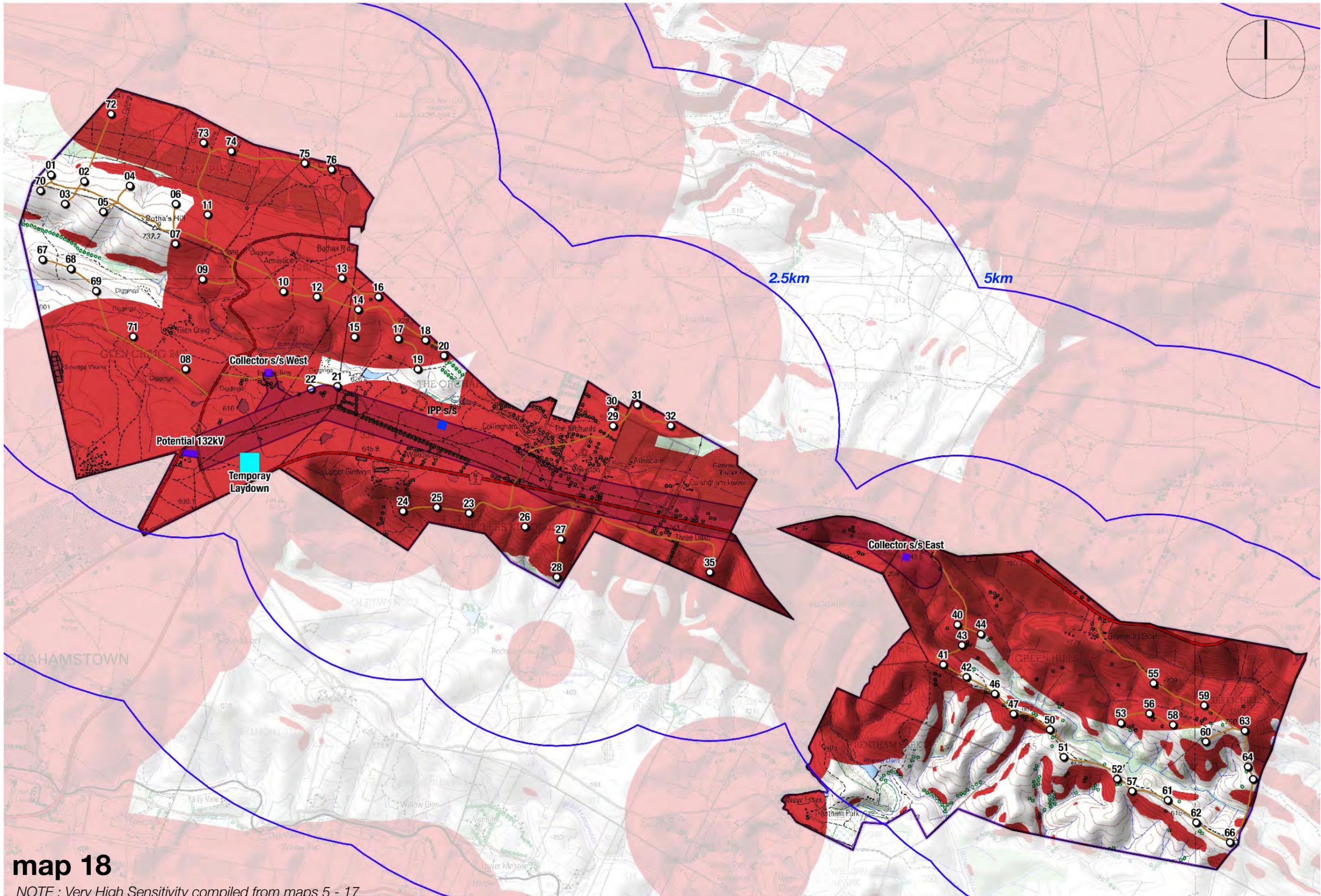


map 17

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Small Airfields

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

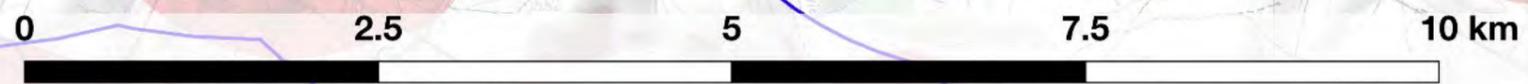


map 18

NOTE : Very High Sensitivity compiled from maps 5 - 17

VERY HIGH COMPOSITE VISUAL SENSITIVITY

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



EXTERNAL REVIEW DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT

ALBANY WIND ENERGY FACILITY
DEA Reference Number: 14/12/16/3/3/2/1131

May 2020

Prepared by



GLOBAL GREEN

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EXECUTIVE SUMMARY

Global Green Environmental Consultants in association with the Environmental Assessment Research Group (EARG) from the North West University (NWU - Potchefstroom campus) was appointed by Richard Summers Inc. to conduct an external review of the Draft Environmental Impact Assessment (EIA) Report for the Albany Wind Energy Facility (DEA Reference Number: 14/12/16/3/3/2/1131). The review was conducted by two reviewers according to the NWU EIA Report Quality Review Package to determine the extent to which the report complies with minimum legal requirements and thereby serves to support reasonable decision making by the competent authority.

Overall the report achieved an 'E' rating which means that as a whole the content is not satisfactory with the following significant omissions or inadequacies. Moreover, it means that the content cannot support reasonable decision making (that is rational and proportional) by the competent authority as required by the relevant legislation:

- *Methodology*: The assessment methodology is lacking in key respects, especially in relation to significance and mitigation. The significance method and criteria are poorly explained and inconsistently applied. The mitigation methodology failed to apply the mitigation hierarchy and subsequently certain reasonable mitigation options (such as avoidance) were overlooked.
- *Rationality*: Due to the weaknesses in methodology the rationality behind the significance ratings and mitigation options were unclear and incoherent.
- *Key issues*: The report failed to deal with what seems to be the most significant potential impact of the WEF raised by IAPs, namely on surrounding eco-tourism enterprises. This is a fatal flaw in the Draft EIA Report.

We trust that you find the report in order and thank you for the opportunity to contribute. If there are any uncertainties or additional information required, please feel free to contact either of the undersigned.



Prof Francois Relief

Lead Reviewer
25-05-2020



Me Charlotte Cilliers

2nd Reviewer
25-05-2020

CONTENT

EXECUTIVE SUMMARY		1
1. INTRODUCTION AND BRIEF		3
1.1	Scope of Work – Review of Draft EIA report	3
1.2	Reviewers	4
2. EXTERNAL REVIEW METHODOLOGY		4
2.1.	Content of the Review Package	4
2.2.	Applying the Review Package	5
3. REVIEW RESULTS		6
3.1.	Main Results	6
3.1.1.	Review Area 1: General Aspects	7
3.1.2.	Review Area 2: Conformance to Plan of Study	8
3.1.3.	Review Area 3: Determining with Significance	9
3.1.4.	Review Area 4: Public Participation	12
3.1.5.	Review Area 5: Dealing with Mitigation	12
3.2.	Detailed Results	13
REFERENCES		24
Annexure A: CV Summaries of Reviewers		27

DOCUMENT CONTROL			
Project	Albany Wind Energy Project – External Review		
GG reference ID	RS-18/04/2020	Client	Richard Summers Inc.
Lead reviewer	Prof Francois P Retief Tel: +27 83 639 2293	Client Contact	Mr Richard Summers Tel: +27 82 534 0328
2nd Reviewer	Me Charlotte Cilliers Tel: +27 72 573 8962	Documents Reviewed	Draft EIA Report <i>DEA Ref: 14/12/16/3/3/2/1131</i>
Date of the Review	11-15 May 2020	Reviewed against	NEMA, EIA Regulations 2014 (as amended 2017)

1. INTRODUCTION AND BRIEF

Global Green Environmental Consultants was appointed by Richard Summers Inc. as external reviewer for the Albany Wind Energy Facility (WEF) Draft EIA report (dated March 2020). The external report review was conducted in collaboration with the Environmental Assessment Research Group (EARG) of the North West University (NWU). We confirm that Global Green and NWU act independently and has no vested interest in the development project under review. External review and specifically report quality review is a particular focus of Global Green and the EARG. The lead reviewer has been co-author of various EIA review reports as well as subsequent peer reviewed papers that include report quality reviews between different South African EIA regimes (Retief et al, 2011; Sandham et al, 2012; Kidd et al, 2018); report quality related to specific industries such as mining (Sandham et al, 2008a) and manufacturing (Sandham et al, 2013), as well as report quality related to specific sectors such as water management (Sandham et al 2008b), biodiversity and conservation (Hallat et al, 2015; Swanepoel et al, 2019; Sandham et al, 2020), biological control (Sandham et al, 2010), etc. More recently a paper was also published on the conceptualization of EIA quality internationally (Bond et al, 2018).

As an introduction to the review this section briefly introduces the agreed scope of work as well as the individual reviewers involved, namely: Prof Francois Retief and Me Charlotte Cilliers.

1.1 SCOPE OF WORK – REVIEW OF DRAFT EIA REPORT

The overall scope of work is specified in a review proposal dated 16 April 2020, and requires the following:

Scope of work:

1. To conduct an independent external review of the quality of the Draft EIA Report for the Albany WEF against relevant South African legal requirements.
2. To consider the content of related reports such as the Final Scoping Report as well as relevant specialist reports in as far as their content informs the Draft EIA Report quality and requirements. In particular, this refers to the Plan of Study included in the Final Scoping Report as well as those specialist studies related to key environmental issues and impacts.

1.2 REVIEWERS

The following two independent reviewers conducted the external review (see Annexure A for CV summaries):

- Prof Francois Retief – NWU and Global Green
- Me Charlotte Cilliers – Global Green

2. EXTERNAL REVIEW METHODOLOGY

Various international packages and guidelines have been developed for EIA report quality review. The Lee-Colley package (Lee and Colley, 1992) is probably the most well-known and widely adapted and applied internationally. In terms of South Africa, significant progress has been made to adapt international report review packages to the local context. The review package used for this review is a version of the so-called 'NWU Report Quality Review Package' which has been adapted from the Lee-Colley package and is continually updated as local policy and legislation changes. The most recent version of the package reflects the 2014 EIA Regulations and subsequent 2017 amendments. Different versions of the 'NWU Report Quality Review Package' has been successfully applied to EIA quality review over the years – the results of which have been published in various reports and peer reviewed journals as highlighted in section 1.

The review criteria applied under section 3.2 and summarised in Table 3.2 deal specifically with South African legal requirements for the Draft EIA report. It is important to stress that these criteria should not be considered best practice criteria because frankly the South African EIA system does not reflect international best practice. This review merely considers the report content against what the law requires in South Africa, also acknowledging that legal interpretation of some requirements might vary. Ultimately according to South African law the content of the EIA Report must support the relevant authority to make a 'reasonable' decision that is 'rational' and 'proportional' (see Alberts et al, 2020; Retief et al, 2020)

2.1. CONTENT OF THE REVIEW PACKAGE

The NWU Report Quality Review Package is designed as a self-contained package with the following components:

- a list of criteria (grouped under Review Areas) to be used in each report review.
- an evaluation sheet/table on which to record the findings from applying the criteria.

The criteria should reflect the South African EIA System legal requirements and, as far as possible, satisfy the following requirements:

- each should be well defined and unambiguous;
- each should be capable of reasonably consistent and objective application;
- each should serve a distinct purpose different from the purposes of other criteria;
- each should be considered sufficiently important to merit influencing the ultimate assessment of report quality;
- the number of criteria should be as few as possible, consistent with covering all topics identified as essential (judged, in this instance, by reference to the South African legislative minimum requirements).

2.2 APPLYING THE REVIEW PACKAGE

EIA reports should be reviewed independently by at least two reviewers and any differences in the review results should be systematically examined by them to see whether they can be resolved. As already indicated in section 1.2, two reviewers took part in this particular review. The evaluation resulting from applying each criterion is recorded by the reviewers on the evaluation table using a standard list of assessment symbols as described in Table 2.1. ‘Letters’ rather than ‘numbers’ are used as symbols to discourage reviewers from crude aggregation. The evaluation table should not only be used to record the chosen assessment symbols, but also to record, in a brief summary, the principal justification for the evaluation score. This discourages ‘over-mechanical’ reviews.

Table 2.1. List of evaluation symbols

Symbol	Explanation	Implications for decision making
A	Relevant tasks well-performed, no important tasks left incomplete.	These ratings (A-C) mean that the quality of the report content complies with minimum legal requirements and is sufficient to allow the competent authority to make a reasonable decision (that is rational and proportional) in line with the requirements of the Promotion of Administrative Justice Act (PAJA – Act 3 of 2000).
B	Generally satisfactory and complete, only minor omissions and inadequacies.	
C	Can be considered just satisfactory despite omissions and/or inadequacies.	
D	Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies.	These ratings (D-F) mean that the quality of the report content does not comply with minimum legal requirements and is insufficient to allow the competent authority to make a reasonable decision (that is rational and proportional) in line with the requirements of the Promotion of Administrative Justice Act (PAJA – Act 3 of 2000).
E	Not satisfactory, significant omissions or inadequacies.	
F	Very unsatisfactory, important task(s) poorly done or not attempted.	
NA	Not applicable. The Review Topic is not applicable, or it is irrelevant in the context of this Statement.	

The current version of NWU Report Quality Review Package has been extensively tested. The results show a meaningful level of agreement in the assessments made by different reviewers of the same report. The Draft EIA report was evaluated against review areas and criteria derived from GNR 982 and specifically Regulation 23 as well as Appendix 3, which describes the purpose and content requirements. The ultimate aim of the review was to determine to what extent the report provide sufficient information for decision making and if the report complies with minimum legal requirements.

3. REVIEW RESULTS

This section deals with results of the external review for the Albany WEF Draft EIA Report. In line with the methodology described in the previous section the results are presented as ‘main results’ in relation to the different Review Areas (section 3.1) and ‘detailed results’ in terms of the different Review Criteria (section 3.2).

3.1 MAIN RESULTS

Table 3.1 provides a summary of the main review results per Review Area. Based on the results it is concluded that the overall report achieves an ‘E’ rating which means that as a whole the content is not satisfactory with significant omissions or inadequacies. Moreover, it means that the content cannot support reasonable decision making (that is rational and proportional) by the competent authority as required by the relevant legislation.

Table 3.1: Summary of main review results for the Draft EIA Report

SUMMARY OF REVIEW AREAS		A	B	C	D	E	F
1	General Aspects				X		
2	Conformance to the Plan of Study					X	
3	Determining Significance					X	
4	Public Participation		X				
5	Dealing with Mitigation					X	
FINAL RATING						X	

3.1.1 Review Area 1: General Aspects

The review results for Review Area 1: General Aspects produced an overall 'D' rating (*"Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies"*). We base this rating on the following findings:

- **Consideration of Guidelines:** EIAs must have regard for any guideline published in terms of section 24J of NEMA and any minimum information requirements. This includes the updated 2017 *Need and Desirability Guideline* which has seemingly not been consulted. The Guideline sets out a list of questions which should be addressed when considering need and desirability of a proposed development. These are divided into questions that relate to ecological sustainability and justifiable economic and social development. None of those questions has been directly and expressly addressed. When considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including local municipal IDPs and SDFs which has not been done in the EIR. The failure to address correctly the enquiry into need and desirability is a particular weakness of the EIA Report.
- **Scope of the assessment:** The Draft EIA Report excludes the substations and transmission line from the project description and project footprint calculation. We could not determine from the report exactly why this is, except for reference to the fact that Eskom will provide this infrastructure and therefore are responsible for these authorisations. However, irrespective of who is responsible for the infrastructure, the assessment of the WEF is incomplete without including the substations and transmission line. The reason for this is because whatever is approved in terms of the WEF will essentially predetermine and lock in the location of the substations and delineation of the transmission line. The specialist studies did seem to include the substations and transmission line in their project descriptions and therefore it is assumed in their assessment as well. We did find that the avifauna assessments did indeed consider the transmission line while other specialist studies such as the visual assessment did not. So there are inconsistency in the scope of the assessment and the project descriptions between different reports. The implication of this inconsistency in the project scope is that the outcome of the assessment as a whole could be questioned.
- **Inconsistency in project description:** The project description changed from the BID to the Scoping Report to the EIA Report. It is not clear if these changes are the result of the outcome of the assessment or what the rationale for these changes is. As already mentioned certain infrastructure, i.e. substations and transmission lines are excluded from the EIA Report. The turbine capacity changed from 4,5MW in the BID to 6MW in the

Scoping Report, and between 4 and 8 MW in certain specialist reports, etc. Moreover, reference is made to a 90 turbine layout in the EIA Report which is not provided anywhere in the report itself.

3.1.2 Review Area 2: Conformance to the Plan of Study

The review results for Review Area 2: Conformance to Plan of Study suggest an overall 'E' rating (*“Not satisfactory, significant omissions or inadequacies”*). Based on a comparison of the Plan of Study with the Draft EIA Report we highlight the following:

- **Alternatives to be assessed:** No indication is given in the Plan of Study of which alternatives (or project description) will be assessed in the EIA or by the specialists. Page 96 of the Draft EIA Report refers to a 90 turbine layout provided to the specialists to be assessed. Yet looking at the specialist reports they only considered the 66 turbine preferred alternative. So overall it was difficult to follow the logic how the EIA and specialist assessments considered the 90 turbine alternative (or any alternative for that matter) and then came up with the 66 turbine alternative. At the moment it seems as if the 66 turbine alternative was first decided and then the specialists merely assessed the already preferred alternative which does not make sense – because this might infer that the outcome was predetermined and therefore the EIA does not comply with Section 24O of NEMA.
- **Key issues not addressed:** The conformance of the specialist studies with the TOR described in the Plan of Study was not reviewed in detail. We rather focussed on the key issues raised by IAPs and to what extent they were addressed. The following are examples of important key issue not addressed in the Draft EIA Report:
 - The visual and socio-economic impact of the proposed WEF on sensitive visual receptors (game farms and nature reserves) and tourism in the area. The commitment was made in the Scoping Report to various IAPs that the visual and socio-economic impacts of the WEF on each affected landowner will be assessed. We could not find evidence that this was done – the outcome of the Draft EIA Report on this issue is inconclusive and speculative at best (also see Review Area 3). Therefore, the issue is unresolved.
 - The impact of the WEF on land values was also explicitly raised by IAPs. In response, the socio-economic study acknowledged this issue but considered it outside of its scope – and rather recommended that it should be investigated and rated separately by a Land Valuer / Economist. This was not done.
 - Social impacts related to the decommissioning phase was not addressed. The environmental authority surely needs to have a clear understanding of the socio-

economic impacts should the facility be decommissioned. This is a critical consideration in the context of need and desirability which is not addressed.

3.1.3 Review Area 3: Determining Significance

The review results suggest an overall 'E' rating ("*Not satisfactory, significant omissions or inadequacies*") for Review Area 3: Determining Significance. Significance determination lies at the heart of EIA and relies on a clear methodological description and consistency in the application of the method and line of argumentation. We highlight the following key weaknesses of the Draft EIA report:

- **Weak methodological design and description:** The Final Scoping and/or Draft EIA Report do not explain how significance will be determined – it merely defines different criteria with no explanation of how the criteria relate or how they should be weighed towards a significance rating. This is important because significance is in many instances a subjective value judgement which relies on a systematic and clearly described method. However, subjective does not mean arbitrary. This lack of a clear and systematic method manifests in inconsistencies in argumentation. Examples, from Appendix C1 are:
 - Direct impacts from dust nuisance is rated *localised, short term, probable, moderate = low significance (before mitigation)* while water quality direct impacts with exactly the same ratings = *moderate significance*.
 - The cumulative impacts for dust nuisance (before mitigation) rates *localised, short term, possible, moderate = moderate significance* while cumulative impacts related to infilling of a water course with exactly the same ratings = *low significance*.
- **Inconsistencies in the application of significance criteria:** The evaluation criteria presented in Table 10.1 in the Final Scoping Report is inconsistently applied in section 9 and Appendix C of the EIA Report. This brings into question the rationale as well as accuracy of the significance ratings. For example:
 - Table 10.1 refers to 'consequence' which is not dealt with in Appendix C;
 - The ranking terminology differs between Table 10.1 and Appendix C, i.e. extent uses *localized, moderate* and *extensive* while Appendix C refers to *localised, regional, national*;
 - Mitigation refers to *low, moderate, high, very high* while Annex C merely refers to *easy*.
- **Incoherent argumentation:** It was at times difficult to follow the rationale underpinning the significance ratings. For brevity sake we only use the example of what is probably the most significant issue raised during the scoping phase, namely the socio-economic impacts of the WEF on eco-tourism in the area.

- The results of the socio-economic specialist report translated into the significance ratings in the EIA Report suggest that the WEF will have a “*low significance*” positive impact in terms of both ‘new employment’ as well as ‘impact on local economy’ - while a “*moderate significance*” negative impact in terms of ‘loss of existing employment’ and ‘local economic impact’. So why would the competent authority support a development that will seemingly have a “low” economic benefit and a “moderate” negative economic impact? It makes no sense. Such a development should on the face of it not be supported.
- The visual impact assessment concluded a “*high significance*” impact on visual sensitive receptors (direct and cumulative impacts) and “*moderate significance*” rating for impact of night lights before and after mitigation. However, it seems that the mitigation hierarchy was not applied because if avoidance would be considered the impact after mitigation could be low. However, no indication could be found that avoidance was considered. It further stems to reason that with a minimum of 35 turbines required to make the development viable, ample scope exists to apply avoidance as a mitigation option to the 66 turbine preferred alternative. Moreover, it is explicitly stated in the Draft EIA Report (p110 and 186) that as far as possible turbines should not be erected in direct view of lodges and strategic viewpoints at the game reserves – if this avoidance option is applied then the “*high significant*” impact on visual sensitive receptors after mitigation would reasonably be reduced to “*low significance*”.
- **False and unsubstantiated claims:** The content of any EIA Report is rarely 100% conclusive and EAPs and specialists work with information that is reasonably available and obtainable within the resources and time available. Therefore, we fully recognise these limitations and are careful not to be unreasonable in our expectations. However, in this case we did identify what we consider to be false and unsubstantiated claims in relation to certain key issues and impacts, in particular in relation to the impact of the WEF on the eco-tourism industry. The conclusions reached and described in both the socio-economic specialist report as well as in the EIA Report is highly questionable. Because of the high level of importance that this particular issue enjoys in relation to this WEF (raised by numerous IAPs during the Scoping Phase) we consider it necessary to elaborate. We refer in particular to the following concluding statements (p110):
 - “*Tourism in the study area is associated with the “Africa and bush experience” and the tourism landscape thus differs from studies done in Europe, UK and USA. Parallels can however still be drawn and it is the opinion of the SIA Specialist that research results can safely be used for this study*”. It is not clear what ‘safely’ refers to but it is correct that international studies on the impact of WEF on tourism could and should be

considered. However, it is imperative that these international studies be considered in context and with utmost circumspection. Context is critical and generalizability of results should be viewed with extreme caution in an EIA for obvious reasons, not least because of differences in tourism product, differences in tourism market, distance from turbines, design of turbines, etc. The truth is that we don't know what the impacts of WEFs are on nature based or eco-tourism facilities and no attempt was made in the Draft EIA Report to deal with this issue in any meaningful and scientifically valid way.

- *“No evidence has transpired to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism”.* This is a false generalisation based on a rather dated report on the tourism impact of wind farms in Scotland (Aitchison, 2012). Much of the argumentation in the socio-economic study seems to be from this single source, which in itself is problematic. It would have been more accurate to acknowledge that internationally there is an ongoing debate on this issue with basically three camps (by the way - none of them argue 'no' tourism impact!), namely i) those who argue limited impact on tourism, ii) those who argue more meaningful impacts on tourism and iii) those who seem to present more circumspect results, pointing out the nuanced nature of the issue, to be carefully considered within context (see for example Etherington 2010; Jerpasen and Larsen, 2011; Munday et al., 2011; Aitchison, 2012; O’Keeffe and Haggett 2012; Jaber, 2013; Karydis, 2013; Westerberg, et al., 2013; Reddington et al 2014; Rudolph, 2014; De Sousa and Kastenholz, 2015; Silva and Delicado, 2017).
- *“None of the local private game farms that have been consulted and are visually affected by existing wind farms have experienced negative economic impacts”.* This is a highly questionable conclusion based on an unverifiable method and results. Important conclusions such as these should be based on robust verifiable and peer reviewed research. Where such research does not exist (as in this case) two options are open. The first option would be to acknowledge a high level of uncertainty and seek to apply 'avoidance' as a mitigation option. Best practice EIAs avoid potentially significant impacts with high levels of uncertainty. In this instance avoidance is a perfectly reasonable option. The second option will be to conduct the research required to answer the question. However, we suspect the time and resources it will take to address the question in a scientifically valid way will be too resource and time consuming considering the development timeframe, which guide us back to the first option of avoidance.
- *“It is however not prudent to claim that there would be no negative impact on tourism as aesthetic and visual impacts (proximity to turbines) are strong influences on individuals’*

attitudes towards wind power projects". So this statement is true but somewhat confusing and contradictory to the second bullet statement above where reference is clearly made to "*... resulted in any adverse impact on tourism*". There will indeed be an impact, but how significant that impact will be is the question to be answered. As stated above, this issue is unresolved in the Draft EIA Report.

- "*Proximity to turbines and their localities (visual impacts on lodges and strategic viewpoints on the game farms) could be the determining factors for visitor satisfaction and impacts on visitor volumes*". This again acknowledge that there could be impact, which we agree with. However, these impacts do not seem to be addressed or mitigated in any way in the Draft EIA Report.

3.1.4 Review Area 4: Public Participation

It is difficult to evaluate the overall success of the public participation process by only reviewing report content. However, based purely on the content of the EIA Report the review results suggest an overall 'B' rating ("*Generally satisfactory and complete, only minor omissions and inadequacies*"). We raise the following important point as a particular weakness at this stage of the EIA process:

- **Omission of comments and response section in Draft EIA Report:** Clearly the development is viewed as controversial by various IAPs - as reflected in the extensive comments and response table included in the Final Scoping Report. It is however, highly questionable why an updated version of the comments and response table is not included in the Draft EIA Report – to explain to IAPs how the various comments were addressed. To expect the IAPs to wade through the Draft EIA Report to determine for themselves if their comments were addressed does not seem reasonable. So clearly as a minimum the updated comments and response table should have been included in the Draft EIA Report. We suspect the public will not take kindly to this omission.

3.1.5 Review Area 5: Dealing with Mitigation

The review results suggest an overall 'E' rating ("*Not satisfactory, significant omissions or inadequacies*") for Review Area 5: Determining with Mitigation. We highlight the following key weaknesses:

- **Conflating reversibility and mitigation:** Conflating these two concepts is conceptually and methodologically flawed because reversibility deals with the lower tiers in the mitigation hierarchy together with restoration and rehabilitation considerations (see section 10 of the

Final Scoping Report and Appendix C of the Draft EIA Report). So, to conclude that the same impacts are both easy to mitigate and reverse makes no sense. Mitigation needs to systematically consider first avoidance, then minimization, then restoration (reversibility could fit here) and then compensation / offsets - in this particular order (see next point).

- **Failure to apply the mitigation hierarchy:** Mitigation options need to be systematically considered for each impact – i.e. to what extent can a particular impact be avoided, minimised, restored / reversed or compensated / offset? No proof could be found where the mitigation hierarchy was actually applied. For example:
 - No attempt seemed to have been made to ‘avoid’ impacts on sensitive viewpoints – either by relocating or reducing the number of turbines, even though this option is explicitly recommended by the socio-economic specialist study and the Draft EIA Report (see page 110). The contradictory statement in the socio-economic specialist study that *“No mitigation is possible as turbines cannot be screened ...”* seems to suggest that avoidance is not considered a form of mitigation.
 - The sensitivity map provides the location of high sensitive / constraint zones with little thought seemingly to avoiding these sensitive locations – and where they can’t be avoided to consider other reasonable mitigation options. The impression is that the geographical sensitivity was mapped and then the location of the turbines ignored it.

3.2 DETAILED REVIEW RESULTS

This section presents the detailed review results per Review Area and specific criteria. Table 3.2 summarises the results and provide brief justification for the review scores. The results reflect the combined views of the two reviewers.

Table 3.2: Detailed review results for the Draft EIA report (Albany WEF)

Reference	Review Areas and Criteria	Evaluation Symbols							Review Comments and Justification	
		A	B	C	D	E	F	N/A		
Review Area 1: General Aspects										
GNR 982 Appendix 3(3)(a)(i)(ii)	1.1 Were the details of the EAP who prepared the report; and the expertise of the EAP, including a curriculum vitae included?		X							See section 1.4 and Appendix B However, the report indicates Alan Carter as the EAP and the BID shows Caroline Evans as the EAP.
GNR 982 Appendix 3(3)(b)(i)(ii)(iii)	1.2 Was the location of the activity, including the 21 digit Surveyor General code of each cadastral land parcel included, and where available, the physical address and farm name?	X								See p.vii
GNR 982 Appendix 3(3)(c)(i)(ii)	1.3 Was a plan included which locates the proposed activity or activities applied for at an appropriate scale, or, if it is a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or on land where the property has not been defined, the coordinates within which the activity is to be undertaken?	X								See p.x to xii
GNR 982 Appendix 3(3)(d)	1.4 Was a description of the scope of the proposed activity provided, including a description of all listed and specified activities triggered; and/or a description of the activities to be undertaken, including associated structures and infrastructure?				X					See section 2 <ul style="list-style-type: none"> - The project description changed from BID to the Scoping to the Draft EIA Report for example: the BID documents explicitly refers to 66 turbines to be reduced after the assessment while the Draft EIA Report talks about 90 turbines to be reduced to 66 – the location of the 90 turbine alternative (1) is nowhere provided in the report generation capacity per turbine changed from 4,5 MW in BID and Scoping Report to 6 MW in Draft EIA Report. - On p90 reference is made to a desktop screening that was done by and for the proponent for a 90 turbine development option. However, this screening did not form part of the EIA process and the rationale behind the screening is not reflected in the content of the Draft EIA Report. - On p96 of the Draft EIA it is clearly stated that the specialists were tasked to assess the 90 turbine option (layout alternative 1) – while the content of the specialist studies confirm that they only assessed the 66 turbine option? It is therefore not possible to understand the rationale behind the decision to go with the 66 turbine option – and therefore the content of the report does not satisfy the requirements of the EIA Regulations. - Power line and substations excluded from the Draft EIA Report

										and some specialist studies.
GNR 982 Appendix 3(3)(e)	1.5 Was a description provided of the policy and legislative context within which the development is proposed, and an explanation provided of how the proposed development complies with and responds to the legislation and policy context?						X			See sections 3 and 4 <ul style="list-style-type: none"> - The Draft EIA Report discuss the national and provincial policy context at length. However, no reflection on the local development and policy context i.e. IDPs, SDFs, etc. is provided. Section 4.18 of the SIA mentions the SDF and IDP but there is no attempt to incorporate this into the Draft EIA Report. Also, there is no contemporaneous reference to the SDF being approved by the Municipality in Nov 2019.
GNR 982 Appendix 3(3)(f)	1.6 Was the need and desirability of the proposed activity motivated, including the need and desirability of the activity in the context of the preferred location?						X			See section 3 <ul style="list-style-type: none"> - EIAs must have regard for any guideline published in terms of section 24J of NEMA and any minimum information requirements. This includes the updated 2017 Need and Desirability Guideline which has clearly not been consulted by the EAP. If the EAP did consult the 2017 Guideline this is not in any way evident from the Draft EIA Report. The Guideline sets out a list of questions which should have been answered and addressed when considering need and desirability of a proposed development. These are divided into questions that relate to ecological sustainability and justifiable economic and social development. The questions that relate to ecological sustainability include how the development may impact ecosystems and biological diversity; pollution; and renewable and non-renewable resources. When considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including Municipal IDPs and SDFs. As the SDF and IDP have not been analysed in the Draft EIA Report the policy / legislative assessment is incomplete. The result is that the need and desirability in the DEIR is heavily skewed towards favouring renewable energy above other relevant policy / societal considerations - there is no balanced consideration / evaluation of the various (other) factors that are relevant to a balanced / neutral assessment into need and desirability - Section 3.2 emphasises the stimulation of new business opportunities and job creation as a main contribution of the Albany WEF, even though the outcome of the assessment shows this to be of low significance? We therefore conclude that the local economic benefits are overplayed and overemphasised in relation to need and desirability - and inconsistent with the actual outcome of the assessment itself.

GNR 982 Appendix 3(3)(s)	1.7 Is there evidence of an undertaking under oath or affirmation by the EAP in relation to: (i) the correctness of the information provided in the reports; (ii) the inclusion of comments and inputs from stakeholders and I&APs; (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties?	X							See section 1.4 and Appendix E
Review Area 2: Conformance to the Plan of Study									
GNR 982 Appendix 3(1)(1)	2.1 Was the environmental impact assessment process undertaken in line with the approved plan of study for environmental impact assessment?						X		See comments below.
GNR 982 Appendix 2(2)(i)(i)	2.2 Is there conformance to the environmental impact assessment process described in the Plan of Study, including the consideration of alternatives to be considered and assessed within the preferred site?						X		See section 10 of the Final Scoping Report - No indication is given in the Plan of Study which alternatives (or project description) will be assessed. The only clue to this is provided on p96 of the Draft EIA Report – which suggest 90 turbines i.e. layout alternative 1 (however 90 turbine layout not provided nor assessed in the EIA phase).
GNR 982 Appendix 2(2)(i)(ii)	2.3 Were the aspects to be assessed as indicted in the Plan of Study, ultimately addressed in the environmental impact assessment process?						X		The conformance of the specialist studies with the TOR described in the Plan of Study was not reviewed in detail. We rather focussed on the key issues raised by IAPs and to what extent they were addressed. The following are examples of important key issue not addressed in the Draft EIA Report: - The visual and socio-economic impact of the proposed WEF on sensitive visual receptors (game farms and nature reserves) and tourism in the area. The commitment was made in the Scoping Report to various IAPs that the visual and socio-economic impacts of the WEF on each affected landowner will be assessed. We could not find evidence that this was done – the outcome of the Draft EIA Report on this issue is inconclusive and speculative at best (also see Review Area 3). Therefore, the issue seems unresolved. - The impact of the WEF on land values was also explicitly raised by IAPs. In response, the socio-economic study acknowledged this issue but considered it outside of its scope – and rather recommended that it should be investigated and rated separately by a Land Valuer / Economist. This was not done.

GNR 982 Appendix 3(3)(g)	3.2 Is a motivation provided for the preferred development footprint within the approved site?				X			See Table 2-1 The transmission line and transformers are not included in the footprint calculation which makes little sense because the development is subject to this infrastructure being provided.
GNR 982 Appendix 3(3)(h)	3.3 Is a full description provided of the process followed to reach the proposed development footprint within the approved site?				X			See Table 2-1 and previous comment.
GNR 982 Appendix 3(3)(i)	3.4 Is a full description provided of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred location through the life of the activity?					X		See section 10 of the Final Scoping Report and section 9 of Draft EIA Report. See comments under criterion 3.1 above.
GNR 982 Appendix 3(3)(i)(i)	3.5 Is a description provided of all environmental issues and risks identified during the environmental impact assessment process?			X				See section 10 of the Final Scoping Report and section 9 of Draft EIA Report. The main issues to be considered have been identified during the scoping process, but see findings below in relation to the substance of the actual assessment.
GNR 982 Appendix 3(3)(i)(ii)	3.6 Was an assessment conducted of the significance of each issue and risk and an indication provided of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures?					X		See section 10 of the Final Scoping Report and section 9 of Draft EIA Report. The assessment did deal with significance of impacts pre and post mitigation. However, this review raises serious limitations in terms of how mitigation was dealt with - as discussed in more detail under review area 5 below.
GNR 982 Appendix 3(3)(j)(i)	3.7 Was an assessment conducted of each identified potentially significant impact and risk, including cumulative impacts?					X		See section 10 of the Final Scoping Report and section 9 of Draft EIA Report. In section 9.1 cumulative impacts are defined although no method is described on how to deal with the cumulative impacts and therefore difficult to understand the rationale behind the cumulative rankings.
GNR 982 Appendix 3(3)(j)(ii)	3.8 Was an assessment conducted of each identified potentially significant impact and risk, including the nature, significance and consequences of the impact and risk?					X		Consequence is included in the PS but not dealt with in the Draft EIA Report. Moreover, as already indicated under criterion 3.1 the methodology used for dealing with significance is non-compliant to the EIA Regulations.
GNR 982 Appendix 3(3)(j)(iii)	3.9 Was an assessment conducted of each identified potentially significant impact and risk, including the extent and duration of the impact and risk?				X			Extent and duration is covered in the significance ratings but it is unclear how this relates to overall significance. Until this relation is clarified it will not be possible for the competent authority to make a rationale decision based on the overall significance ratings.

GNR 982 Appendix 3(3)(j)(iv)	3.10 Was an assessment conducted of each identified potentially significant impact and risk, including the probability of the impact and risk occurring?				X			Probability is covered in the significance ratings but unclear how this relates to overall significance. Until this relation is clarified it will not be possible for the competent authority to make a rationale decision based on the overall significance ratings.
GNR 982 Appendix 3(3)(j)(v)	3.11 Was an assessment conducted of each identified potentially significant impact and risk, including the degree to which the impact and risk can be reversed?					X		<p>The reversibility is covered in the significance ratings but unclear how this relates to overall significance. Until this relation is clarified it will not be possible for the competent authority to make a rationale decision based on the overall significance ratings. For this type of development reversibility is particularly important to be considered in view of potential decommissioning of the facility in 25 years.</p> <p>Combining reversibility with mitigation results is a fundamentally flawed assessment approach and methodology.</p>
GNR 982 Appendix 3(3)(j)(vi)	3.12 Was an assessment conducted of each identified potentially significant impact and risk, including the degree to which the impact and risk may cause irreplaceable loss of resources?						X	Irreplaceability is not dealt with in the context of the significance methodology – see for example Appendix C.
GNR 982 Appendix 3(3)(j)(vii)	3.13 Was an assessment conducted of each identified potentially significant impact and risk, including the degree to which the impact and risk can be mitigated?						X	<p>See section 10 of the Final Scoping Report and section 9 of Draft EIA Report.</p> <p>Mitigation options need to be systematically considered for each impact – i.e. to what extent can a particular impact be avoided, minimised, restored / reversed or compensated / offset? No proof could be found where the mitigation hierarchy was actually applied. For example:</p> <ul style="list-style-type: none"> - No attempt has been made to ‘avoid’ impacts on sensitive viewpoints – either by relocating or reducing the number of turbines, even though this option is explicitly recommended by the socio-economic specialist study and the Draft EIA Report (see page 110). The contradictory statement in the socio-economic specialist study that “<i>No mitigation is possible as turbines cannot be screened ...</i>” seems to suggest that avoidance is not considered a form of mitigation. - The sensitivity map provides the location of high sensitive / constraint zones with little thought seemingly on avoiding these sensitive locations – and where they can’t be avoided to consider other reasonable mitigation options. The impression is that the geographical sensitivity was mapped and then the location of the turbines plainly ignored it.

Review Area 4: Public Participation								
GNR 982 Appendix 2(2)(i)(vi)	4.1	Was an indication provided of the stages at which the competent authority were consulted?		X				See section 11
GNR 982 Appendix 2(2)(i)(vii) GNR 982 Appendix 3(1)(h)(ii)	4.2	Were particulars of the public participation process conducted during the environmental impact assessment process provided?		X				See section 11 The public participation process is clearly described. However, a procedural issue might be the project description and EAP details which were provided in the initial BID, and which have since changed. Not sure if this might be a procedural non-compliance from a public participation perspective?
GNR 982 Appendix 3(1)(h)(iii)	4.3	Was a summary of the issues raised by interested and affected parties provided as well as an indication of the manner in which the issues were incorporated / addressed?				X		See section 11 It is highly problematic that the issues raised by the public have not been incorporated into the Draft EIA Report because the EAP made various commitments during the PPP to address issues in the Draft EIA Report – but then failed to include this in the report? IAPs have the right and expectation to understand how the issues they already raised were addressed in the EIR. The failure to clearly explain how the issues raised during scoping have been dealt with by the EAP and incorporated in the Draft EIR Report is a very serious defect.
Review Area 5: Dealing with Mitigation								
GNR 982 Appendix 3(1)(2)	5.1	Were the environmental impacts, mitigation and closure outcomes as well as the residual risks of the proposed activity set out in the environmental impact assessment report?				X		See sections 8 to 12 – and Appendix C The mitigation failures constitute a fatal flaw for the EIA at this point. This view is based on the following: <ul style="list-style-type: none"> - Conflating reversibility and mitigation is flawed EIA methodology. - The mitigation hierarchy was not systematically and explicitly applied. For example, the failure to seriously consider avoidance of what seems to be the most significant potential impact of the WEF on eco-based tourism is inexplicable. In view of the high level of uncertainty around the latter impact avoidance of significant adverse impacts (and precautionary approach) seems to be the methodologically correct and reasonable option – although there is no indication that this was attempted by either the visual impact assessment or SIA – contradicting clear statements in both reports that this should be done i.e. <i>“It is however suggested that turbines, as far as possible, not be erected in direct view of lodges</i>

									<p>obvious reasons, not least because of differences in tourism product, differences in tourism market, distance from turbines, design of turbines, etc. The truth is that we don't know what the impacts of WEFs are on nature based or eco-tourism facilities and no attempt was made in the Draft EIA Report to deal with this issue in any meaningful and scientifically valid way.</p> <ul style="list-style-type: none"> - <i>"No evidence has transpired to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism"</i>. This is a false generalisation based on a rather dated report on the tourism impact of wind farms in Scotland (Aitchison, 2012). Much of the argumentation in the socio-economic study seems to be from this single source, which in itself is problematic. It would have been more accurate to acknowledge that internationally there is a ongoing debate on this issue with basically three camps (by the way - none of them argue 'no' tourism impact!), namely i) those who argue limited impact on tourism, ii) those who argue more meaningful impacts and iii) those who seem to present more circumspect results, pointing out the nuanced nature of the issue to be carefully considered in more detail within context (see for example Etherington 2010; Jerpasen and Larsen, 2011; Munday et al., 2011; Aitchison, 2012; O'Keeffe and Haggett 2012; Jaber, 2013; Karydis, 2013; Westerberg, et al., 2013; Reddington et al 2014; Rudolph, 2014; De Sousa and Kastenholz, 2015; Silva and Delicado, 2017). - <i>"None of the local private game farms that have been consulted and are visually affected by existing wind farms have experienced negative economic impacts"</i>. This is a highly questionable conclusion based on an unverifiable method and results. Important conclusions such as these should be based on robust verifiable and peer reviewed research. Where such research does not exist (as in this case) two options are open. The first option would be to acknowledge a high level of uncertainty and seek to apply 'avoidance' as a mitigation option. Best practice EIAs avoid potentially significant impacts with high levels of uncertainty. In this instance avoidance is a perfectly reasonable option. The second option will be to conduct the research required to answer the question. However, we suspect the time and resources it will take to address the question in a scientifically valid way will be too resource and time consuming considering the development timeframe, which guide us back to the first option.
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ANNEXURE A: CV SUMMARIES OF REVIEWERS

CURRICULUM VITAE



Personal Details:

Name: Prof Francois P Retief
Date of birth: 8 Nov 1974
Nationality: RSA
Experience: 20+ years

Position:

Professor in Environmental Management with specialisation in Environmental Assessment

Director: Global Green Environmental Consultants

Highest Academic Qualification:

PhD – University of Manchester, UK



NORTH-WEST UNIVERSITY
YUNIBESITI YA BOKONE-BOPHIRIMA
NOORDWES-UNIVERSITEIT
POTCHEFSTROOM CAMPUS

Main Qualifications:

- **2005: Doctor of Philosophy (Ph.D), School of Environment and Development, University of Manchester, United Kingdom**
- 2001: Masters in Environmental Management (M.EM), University of the Free State (UFS), South Africa
- 1998: Masters in Town and Regional Planning (M.TRP), University of the Free State (UFS), South Africa
- 1996: Baccalaureus Artium, Geography and Economics, University of the Free State (UFS), South Africa

EXPERIENCE

Prof Retief completed his PhD at the University of Manchester on the quality and effectiveness of environmental assessment. He then joined the North West University as senior lecturer and was promoted to Associate Professor in 2008. Between 2009 and 2011 he served as Subject Chair for Geography and Environmental Management and between 2012 and 2015 as the first School Director of the newly established School of Geo and Spatial Sciences. In March 2015, he was promoted to Professor and took up a new position within the Research Unit for Environmental Science and Management responsible for managing taught master's programmes.

He has contributed numerous peer reviewed papers (62), book chapters (20) and conference presentations (>80). Recently he co-authored the 2018 edition of the 'Environmental Management in South Africa' handbook. Prof Retief has a 'C1' research rating from the NRF and a Scopus *h-index* of 18. To date he has successfully supervised >50 Masters and PhDs. Prof Retief serves on the editorial boards of all three leading international environmental assessment journals (EIA Review, JEAPM and IAPA) and between 2009 and 2014 he also acted as co-editor of one of these journals namely, Impact Assessment and Project Appraisal (IAPA). He received both the '*Outstanding Service to IAIA Award*' in 2015 and the '*IAIA Individual Award*' in 2020 in recognition of his sustained contributions to the theory and practice of impact assessment at an international level. Overall, Prof Retief is acknowledged as a leading scholar and researcher in the field of environmental assessment.

In terms of EIA practice he has, as director of 'Global Green Environmental Consultants' conducted >100 EIAs under different South African EIA regimes since 1999. During this time, he has also externally reviewed numerous high profile EIAs against international best practice, minimum legal requirements and IFC and World Bank Standards. In 2018 he was appointed by the Department of Performance Management and Evaluation (DPME) and the then Department of Environmental Affairs (DEA) to lead the national EIA System evaluation.

CURRICULUM VITAE



Personal Details:

Name: Me Charlotte Cilliers
Date of birth: 14 Oct 1987
Nationality: RSA
Experience: 8 years

Position with Global Green:

Director

Highest Academic Qualification:

Masters in Environmental
Management – *cum laude*



GLOBAL GREEN
Environmental Consultants

P.O. Box 2629, Potchefstroom, 2520
Tel: 072 573 8962 - Fax: 086 402 2610

Main Qualifications:

- **2016: Masters in Environmental Management, North West University, Potchefstroom campus – *cum laude***
- 2012: BSc Town and Regional Planning, North West University, Potchefstroom campus

Professional Registrations:

- EAPASA (Reg. No.2019/1418)

EXPERIENCE

Me Cilliers started her professional career as a town and regional planner. She has been working in the field of environmental assessment since joining Global Green in 2012. Under the supervision of Prof Retief, she completed her Masters in Environmental Management (*cum laude*) at the North West University (NWU) focussing on the capacity of local government to deliver on their environmental management mandate.

Over the past five years she has been involved in a wide range of impact assessments in the following sectors:

- Housing,
- Agriculture,
- Energy,
- Bulk services infrastructure,
- Waste management,
- Tourism.

She has also been involved in EIA external review projects and therefore is experienced in EIA evaluation and review methodologies.

KWANDWE PRIVATE GAME RESERVE - CLIENT SURVEY ON POTENTIAL RENEWABLE ENERGY DEVELOPMENTS NEAR KWANDWE PRIVATE GAME RESERVE

The following three (3) questions were posed to Kwandwe's client base:

1. **Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?**
2. **Would being able to see a wind farm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?**
3. **How would the visibility of wind farms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?**

Several clients simply answered yes to all three questions and confirmed that they would no longer visit Kwandwe Private Game Reserve. The bulk of the responses where individuals responded in more detail are set out below (please note that the personal information of clients have been redacted in conformity with the Protection of Personal Information Act):

Some of the responses Kwandwe received to Question 1 include:

"Yes it would - the reason for visiting the Reserve is to escape to nature and to "provide a unique wilderness tourism experience.""

"Absolutely. The natural vegetation, away from any development, is what makes visiting Kwandwe so wonderful. Having big visible wind turbines would be a constant reminder of the very things that one is trying to escape from."

*"After visiting Kwandwe and having a wonderful all around experience I believe that having visibility of a windfarm nearby will detract from the experience for potential visitors... We believe that when a person decides to visit a game farm, part of the reason for choosing that kind of destination is to be immersed in nature and to be able to escape the reality of the built world. Therefore, any reminders of modern technology detract from that notion of being in the wilderness.
Yes"*

"Whilst one has to be open to economic development I feel saddened by the turbines. When on safari one really doesn't want any reminders of outside civilization creeping in. Seeing turbines would certainly be a reminder of the outside world and would damage Kwandwe wild feel. I would definitely feel that Kwandwe is more close to civilization if they were around the flashing red lights at night are weird and would ruin the feeling of getting away from it all. Perhaps thought should be given to more central areas doing this and try to keep it away from areas where one is going precisely to try and get away from it all."

"It is rather disturbing to hear that they want to build a wind farm right next to Kwandwe I hope they will reconsider this.. Firstly these wind turbines from my experience can be seen from kilometers away, this will definitely have an impact on the fauna in the area as well as the visual impact to tourists that visit Kwandwe. I visited Kwandwe to experience nature and get away from the city, by building turbines it will ruin this. I believe tourism brings in enormous revenue into our province and we need to look after it by preserving tourist spots such as Kwandwe. I am not against wind farms , but feel they can be build on areas where they do not impact on tourism"

The responses Kwandwe received to Question 2 include:

“Yes it would impact negatively - we would prefer to go to a destination without being able to see or hear wind turbines.”

“Yes, I’m afraid it would. If offered the choice of getting away from it all, to go back to nature, I think I’d choose somewhere with no visual reminders of development, electricity shortages, etc.”

“Being able to see a windfarm at Kwandwe both day and night would definitely be a reason for thinking twice about visiting Kwandwe.”

“It would depend on how close the wind farm is as the noise and visual pollution could interfere with trying to spot animals, falling asleep as well as bird watching.”

“Yes 100 % I am coming for the wildlife, pure nature without a windfarm”

“Thank you for your inquiry from Kwandwe and appreciate your taking time to consider the opinions of visitors to the reserve.

In a nutshell I would like to take the opportunity to voice that for me personally, the large turbines do somewhat detract from the pristine nature of the bush.

Humans have taken more than their fair share of the earth already.

Simultaneously sighting wind farms and wild animals are a reminder of this status quo.

Our family and I have so enjoyed escaping to Kwandwe.

This would definitely add a scar to your environment.”

The responses Kwandwe received to Question 3 include:

“It would impact my decision negatively as I would prefer to visit a Big 5 Private Reserve where no Wind Farms are visible.”

“I’d probably choose not to visit Kwandwe, I’m sorry to say. I have been thinking of Kwandwe so much during lockdown, wishing I was there. I do hope that the powers that be find some other windy place and leave your precious reserve and views therefrom in their natural state. I’m sure the animals would agree.”

“Whilst one would applaud the decision to erect renewable non-carbon emitting power infrastructure rather than a coal burning power station, we believe that to position them near a nature reserve where they would be visible would impact our decision to visit Kwandwe.”

“I would still visit Kwandwe regardless :)”

“I find it sad for you as an organisation but to be honest I would prefer a different wildlife location. It is unimaginable that such a plan will be realized”

Other responses received in connection with the spot survey are copied below (with the respondents’ text being in red font).

“1. Yes, I would find it less enjoyable and natural to see wind turbines while on the game reserve

2. Yes, I would probably choose another destination that was wind turbine free.

3. Yes. I would go somewhere else if wind turbines were put up near Kwandwe.”

- 1. Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *Yes it would. You visit Kwandwe for a game experience, not commercial infrastructure viewing!***
- 2. Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? *It would be a consideration, especially if you could see the turbines from many view points. If it was only visible from a very very small view point, the impact would be minimal.***
- 3. How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? *I would wonder if Game Rangers would start to visit parts of the reserve where visibility of the wind turbines is less to none thus lessening the opportunity to view game and all parts of the reserve and one would miss out on certain aspects of the reserve. Would certain Lodges see them more than others. One would then rather stay in a lodge where the turbines are not visible. Kwandwe is still such a special place I would come back!***

I unfortunately would not visit Kwandwe. It would be ridiculous to erect these wind turbines in eye view of the beautiful Kwandwe reserve

“We were most concerned to receive your recent email regarding the proposal to construct a wind energy facility in the vicinity of, and quite clearly within view of, Kwandwe Private Game Reserve. This seems a very short sighted proposal that seems at odds with the important needs of balancing the local economy by way of generating jobs and improving livelihoods through established tourist related activities such as those at Kwandwe and other private game reserves.

We first went on safari to Kwandwe in 2018 based on recommendation from colleagues. Both couples travelled to and stayed at Kwandwe from the United Kingdom, just as we did. Both couples hold the same views as those expressed here regarding the proposed wind energy facility.

We made the journey to Kwandwe because it is a malaria free, high end game reserve. It is also a ‘cultivated’ wilderness emulating a pristine environment; visitors go there because it is a place to escape from every day life. Committed travellers who go on such safaris, and are prepared to pay a reasonable sum of money to do so, do not wish to see the “industry” of man when they stay in such an environment. They can see that in their own backyard. Guests are seeking something more special which to date Kwandwe has offered. Our intention to keep visiting Kwandwe would be adversely affected if the soft contours of the natural environment was interrupted day and night by the turbines. Visual impact is very important. What a mistake and disappointment that would be.

Wild animals are protected and Kwandwe presents as a wilderness environment. We do not wish to see man made structures – it goes against the very essence of what safari and game reserves are about. We would not elect to safari in such an environment. We could get that in many countries without travelling so far. This proposal is in our opinion, a serious error of judgement and would impact negatively on Kwandwe by the visual impact of unsightly wind turbines. Tourists would vote with their feet and go elsewhere.

To date, we have travelled to the Eastern Cape to enjoy malaria free safari. We contribute to the local economy in many ways – travelling to PE (by car or plane), staying in paid accommodation in Port Elizabeth, dining in restaurants. Many travellers undertake similar journeys and the local economies benefit. If the proposed wind facility goes ahead the negative impact would extend beyond the immediate Grahamstown region.

In summary:

- 1. The visual impact of wind turbines would adversely impact on our safari experience and might result in us travelling elsewhere to stay on other game reserves.*
- 2. Yes, the impact of seeing wind turbines day and night would influence our choice of game reserve. We wish to escape man's industry.*
- 3. We would have to think very carefully about staying at Kwandwe in future. We had undertaken a commitment to the staff and bought in to the concept of the game reserve as presented at Kwandwe during our previous stays. We had intended to return in October 2021 (deferred from August 2020 due to the Coronavirus pandemic).*

We politely request a re-consideration on the wind turbine project proposals to protect Kwandwe and other potentially affected game reserves.

We would be very interested in the outcome of the assessments being undertaken as this could influence our decision to visit Kwandwe in 2021 and beyond."

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *It would be unfortunate.*

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? *No it would not impact my decision. I stay at a game farm quite often and it has windmills that are visual to us and it does not worry as much as I thought it would.*

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? *It would not impact my decision. I would still go and stay there. This is the future and if we want to improve the planet environmentally then this is what we have to accept. Travelling around Europe is the same.*

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

Yes, though wind turbines are not the worst thing to see. But will spoil the "getting away from it all" experience for sure.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

Yes, but see answer to 3

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe

Unlikely - Kwandwe experience would still make up for it.

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *Yes, definitely.*

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?
Yes. Imagine trying to stare gaze at night with red flashing lights distracting you.

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? *With the tourism industry being so competitive it will make it easier for guests to find a similar product elsewhere that does not have any artificial eyesores.*

Q1- *It would have a very negative impact.*

Q2- *Yes, definitely.*

Q3- *We might not visit Kwandwe in the future.*

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

The reason for visiting wilderness areas like Kwandwe Private Game Reserve, is to get away from manmade structures and whatever reminds one of civilization.

We 'escape' to the bush to recharge, revitalize and disconnect from the world.

Therefore if there is any visibility of infrastructure, I would not go back to Kwandwe and choose another lodge where there is no visibility or sign of such infrastructure.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

My reply would be the same as with the first question and I will add that the evening experience of seeing the stars is one of the highlight of any visitor.

We truly live under the African sky of stars... nothing could spoil the experience more than a flashing red lights)

I would most certainly choose another destination without flashing red lights.

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

Again my answer would be the same as for question 1

When choosing a wilderness experience, a break from everyday life and you are willing to pay a premium for that, the absence of civilization and any sign of it is key.

The visibility of windfarms will most definatley spoil the experience and therefore impact negatively on a decision to visit Kwandwe.

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

Many people go to game parks and nature reserves to reduce stress and improve their well-being. Finding peace in nature is similar to practising mindfulness. A windfarm will definitely spoil the country side and the nature experience. It would enhance that which you are trying to leave behind.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

A windfarm will definitely impact on my choice of destinations. Wildlife tourists are more and more looking for "wilder destinations" and seeing a windfarm will take the park in the opposite direction.

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

I would not visit a Game Reserve where a windfarm is visible.

1. Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

Absolutely, yes. A major appeal of visiting any wildlife reserve is to escape from the urban setting and to be surrounded by the natural earth, free of the mark of humans as far as possible; to be transported into another world. Any sign of modern humans, including buildings, roads, power lines and wind turbines, detracts from that immensely.

2. Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

Yes. We choose our wildlife destinations primarily due to the sense of isolation that is felt when being there. The more natural the land and the outlook, the more appealing it is.

3. How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

Kwandwe has always been our first choice when visiting the Eastern Cape, but the more there is that detracts from the experience, the more likely we will explore alternatives. To be brutally honest, the owner's very prominent home is a blight on the landscape within Kwandwe and to a lesser extent, the large asphalt runway (which is less visible). It will be more difficult in future to stop development on the borders of the reserve when there is significant development with a high visual impact, within the reserve itself. Although it is too late to do much about that, we hope that you are able to keep Kwandwe as visually wild as possible.

1. Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *yes*

2. Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? *yes*

3. How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? *negatively*
-

1. Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *Not really*

2. Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? *No - because we have been to Kwandwe several times and would always wish to return*

3. How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? **Not at all - see answer to question 2**

Please note that we are biased in favour of Kwandwe. What my wife and I are not sure of is the impact the development would have on the choice of people that have not already had the wonderful Kwandwe experience.

This is devastating news the wonderful thing about Kwandwe is the open views without seeing anything for miles... it would destroy the idea of being in the bush seeing those wind turbines!!! I know they effect nature all around them too with the non stop sound they give off!! Seeing the red lights would spoil being in nature!!! Seeing a wind farm would sadly make us choose somewhere else even though we are desperate to be back at Fort House in September please God let them open flights then!!!

Thank you for your email. We are saddened to hear about the proposed wind farm and it's visual impact upon Kwandwe.

It is important to consider that Kwandwe is not just about the wild life there, but the whole wild life experience.

To be honest Kwandwe is not the best wild life park when it comes to game watching.

The beauty of Kwandwe is the unique feeling of being genuinely in the wilds and I'm afraid that a wind farm would seriously affect it's natural environment.

We have visited Kwandwe and returned because of it's unique situation but we would not come again if there was a wind farm with a high visual impact. Even worse ,at night, the presence of navigation lights would ruin the atmosphere

I would go as far to say that a wind farm would ruin what Kwandwe had to offer and could even mean the end of this beautiful reserve.

There must be other places to put the wind farm.

1. Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? **We go to Kwandwe for the amazing African bush experience that Kwandwe offers – looking at very ugly wind turbines would hugely detract from this experience. We are horrified to learn of this potential development so close to the Kwandwe border.**
 2. Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? **Yes definitely, it would ruin the whole African bush experience.**
 3. How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? **I would hesitate to visit somewhere where my view would no longer be of the beautiful bush, but rather huge, ugly wind turbines.**
-

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

YES , part of the experience is the lack of any "pollution" including infrastructure /buildings /lights and anything man made- nothing is currently visible apart from maybe some overhead electricity lines

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?
YES – the open space is wonderful as per my answer above and was considering the red lights on each unit as a real eyesore

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? *Once they are in place it may well impact our choice of destination sadly . To see wildlife as is currently viewed at Kwandwe makes it a very special natural experience .*

I am deeply disturbed at the news of a potential windfarm between Grahamstown and Kwandwe Game Reserve. I commend and support any efforts in managing the effects this proposed project might have on the Reserve.

My limited knowledge of wind turbines comes from six years as Deputy chairman of the South East Queensland Electricity Council, which reported to Energex, a Queensland government statutory body. Information from a number of Australian and overseas studies would indicate to me the deleterious effects turbines could have on the migration of birdlife to Kwandwe each year and to the wider animal population. Research reveals recordings detect what is commonly described as “a pulsating, thumping or rumbling sound”, technically known as amplitude modulation, which relates to a change in noise levels that occur approximately once per second as the turbine blades rotate. This is compounded in rural areas and documentation of such would be known to those carrying out an Environmental Impact Assessment for you.

To answer your questions:

1. The visual effects on the wildlife experience of the landscape these aesthetically polluting structures would present would be unfortunately, quite profound. Viewing wildlife in Kwandwe at present allows for the anticipation of never knowing what you’ll find on any given game drive, on any day. This participation in the daily lives of animals in the reserve is the absolute drawcard for our visits. The presence of turbines would completely destroy the feeling of being in natural habitat.

2. If potential visitors to Kwandwe Game Reserve were aware “the hand of man” would reveal windfarm sightings during the day and flashing electronic aviation warnings on turbines at night, I would be concerned it would greatly influence their decision to visit. Visitors to South Africa are looking for genuine wildlife experiences and Kwandwe Game Reserve currently enjoys well documented recommendations in this regard. If turbines were visible, both the wildlife tourist experience and the magic of safari would be severely diminished.

3. Because my husband and I have been visiting Kwandwe since 2010, we will still visit. (Indeed we are booked for October again next year, having to postpone our October 2020 visit due to the COVID-19 lockdown). However, being able to see a windfarm during the day and its prescribed aviation lighting on turbines at night, would have have a huge impact on the wonderful wildlife experiences that continue to draw us back to Kwandwe.

We have visited many Reserves within South Africa since 2007, but in the past few years have made our stays at Kwandwe and just one other Reserve in the north. This has been a conscious decision based on the unique way the entire Kwandwe team manage the Reserve. Every aspect of that management of a variety of wildlife, together with the preservation of the land that supports them, is reflected in an unforgettable wildlife/safari experience.

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

Yes. It would affect the perception of being in true wilderness if the wind farm is visible.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

It would somewhat affect. Frankly I probably would not have known about the wind farm when making a decision to return to Kwandwe. But it may affect somewhat my decision to return after seeing the wind farms on site. I say "somewhat" because the overall Kwandwe experience is so positive that there are still many reasons to come back to Kwandwe for.

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

Same as above.

"Part of the lure of going on a safari is the remoteness, being away from civilization. A wind farm would definitely take away from the visit and most likely would make me choose another location"

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? **NO**

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? **NOT IN THE SLIGHTEST**

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? **NOT AT ALL**

1. Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

**I would not want to see wind turbines*

2. Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

**Wind Turbines would ruin the natural & wild environment.*

3. How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

**We would look for other options.*

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *It is my opinion that these wind turbines are not appropriately positioned anywhere close to Kwandwe. The beauty of the game reserve is the unparalleled view without seeing any lights or obstruction. That is the whole wildlife experience. These lodge are competing with the rest of the world specifically Africa where you have uninterrupted bush experiences. This would severely affect the bush experience and to my mind*

would be a short term decision potentially detracting from the huge investment that overseas investors have made into KwanDwe. These investments are not viable in the first place and to do anything to detract from their viability is selfish and potentially constitutionally challengeable to my mind.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?
The wind farm would be terrible specifically due to the electronic activation warning sign and during the day these beautiful unparalleled views would be spoilt. KwanDwe has spent hundreds of millions in regard to establishing Africa's most beautiful game reserve. The wind turbines can be put in thousands of different places in South Africa and to do anything to impact this investment would not be appropriate.

How would the visibility of windfarms from within KwanDwe Game Reserve impact on your decision to visit KwanDwe?
It would definitely impact my decision to visit KwanDwe specifically with overseas guests that I bring there. Overseas guests are used to a certain standard and their standard is determined and comparable to what they have gone and seen in Africa. We are competing with Africa and specifically after covid the competition would be greater so this decision should not happen.

Would the nature and type of infrastructure that is visible from KwanDwe be of relevance to your visual / aesthetic experience of the landscape?

I have visited game reserves that have visible infrastructure before, one example is Riverbend at Addo which has huge power lines crossing the reserve. From a visual perspective I don't like it at all as it spoils the purpose of my visit – to be in the wilderness, away from it all. Infrastructure is a constant reminder of our lack of wilderness areas.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?
Yes it does impact the decisions I make when choosing a Game Reserve, it is a part of the reason why we have always loved KwanDwe so much. There are some places I have been and I am not keen to go back for that exact reason, either they have a national road, a railway line, power lines or lights from towns at night. For my family we prefer to choose a destination away from all, where the sky is pitch black and the stars jump out, where there is no traffic or rail noise and where there is no infrastructure to spoil our views.

How would the visibility of windfarms from within KwanDwe Game Reserve impact on your decision to visit KwanDwe?

I believe I have spoken to this as well, but there is another more important issue. We love our birds and are part of the Eastern Cape Birding Group, we have heard horror stories about how birds have been killed by wind turbines and this really upsets me. Viewing the birds is as important as the wildlife and wilderness and as much as wind turbines are green energy, which is good, they are in my view incompatible with wilderness areas.

Would the nature and type of infrastructure that is visible from KwanDwe be of relevance to your visual / aesthetic experience of the landscape?

Yes it would

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

Yes definitely - negatively

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

Would choose a game farm with uninterrupted sky views to enjoy the whole nature experience

We both feel that the visual impact of the wind turbines so close to the boundary of Kwandwe would have an impact on the visual/aesthetic experience of the landscape. For us, the charm of Kwandwe is that once you are on the reserve you are not impacted in anyway by general civilisation. With the exception of the very soft light from Grahamstown which you can see at night the fact that you only see the vast expanse of the sky, and at night the stars, is a great feature of Kwandwe. Kwandwe also went to great expense to bury all the overground lines and cables for electricity and phones in order that these did not impact on the true safari experience we get there and it would be a great pity to have this spoiled.

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

No provided game rangers were really aware of them and positioned vehicles so you don't have the turbines in the background of the photo

No problem at all

Said it would be very sad to see the turbines but understands the need for clean energy.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

No

no

Yes he would prefer to be where he could not see wind farms.

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

No real impact

No impact

Would impact his decision,

That said I think it would be more about where they are positioned around the reserve, how visible will they actually be and how visible will they be from the lodges.

In terms of Germany where I have travelled extensively, there are very few places left where there are no wind turbines. All the quaint little villages in the countryside are littered with turbines.

So not sure if that would concern overseas tourists or not. They mostly live with them all the time

So in all very indecisive.

I think the project needs to appreciate the inherent beauty of our country without infrastructure and should be doing everything possible to preserve that beauty so if the windfarm can be repositioned they should be looking at that.

However on the flip side as a nation we will only survive if we can get this economy to grow and that needs a bigger more reliable electricity infrastructure.

1. We have been visiting Kwandwe many times since its inception almost 20 years ago. The uniqueness of this special place is that you feel like hundreds of kilometres away from civilisation and it gives you the impression of a remote secluded gem. The hills in and around the resort is what makes this place so special apart from the experience as such. One can't go without the other.

2. Definitely. We are visiting Kwandwe for many reasons but one particular one is the quietness and also the open space without any pollution of signs of civilisation. The thought of having to see countless windturbines and seeing red instead of stars on a sky without light pollution will impact our decision for sure. This would have a very severe impact on the economic benefits such a big game farm must contribute to the local community.

3. The visibility of such a farm would impact our decision and we would seriously consider our choice of where to spend our money for a wilderness experience.

Sadly I have to say that I do not believe I would ever want to visit a game reserve that I consider to be part of the Bush... Only to have to see man made monstrosities near by. It would be such a shame as Kwandwe is such a beautiful place... I hope for your sake it does not go ahead

If they erect that wind farm then we would not come to Kwandwe again

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

Yes, very much so. I go on safari to be in the wilds and away from civilization. Seeing turbines would ruin the whole experience

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?
Yes, for sure. I would go then to Londolozi or any other place, to be in the wilds

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

I won't return as it is not what I expect from a wild life experience.

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? ***Most definitely – it would compromise entirely the experience of being in the wild***

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? ***Indeed it would – the entire purpose of visiting Kwandwe, and its special appeal is that it***

enables one to enjoy time away from the urban/industrial environment in which we spend our lives – and to have the windfarm visible at all times would be a complete intrusion

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? - *yes it would – we would be devastated if we were unable to enjoy the experience of Kwandwe in its pristine state*

- 1. Yes I think the visual/aesthetic nature of the Kwandwe experience is important – the largest private wilderness in the Eastern Cape (?) – a serious attraction.*
 - 2. Yes it will impact to varying degrees. Our ‘wilderness-style’ travelers will not book knowing this and this is a good portion of our guests. Other less serious bush people may tolerate it without enjoying it. I think that in fact the red night lights are worse than the day time impact. Night skies are a big part of the Kwandwe experience too.*
 - 3. Again yes – as above, I would have to screen and discuss this with potential guests without question. Sadly.*
-

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape?

Yes.

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa?

Yes.

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe?

The entire point of the safari experience is to get away from urbanisation and to experience animals in a pristine nature setting. Any form of man-made infrastructure is likely to impact this experience. Turbines have night lights will detract from the night sky and aside from bird-strikes on the turbines I am led to understand that the subsonic sounds resulting from the turbines moving through the air may have an impact on elephant communication and behaviour because elephants utilise their stomach cavities to transmit similar subsonic signals.

We have been regular visitors to Kwandwe Private Game Reserve over the past 7 years, and have brought many international visitors with us as well. Kwandwe is unique in the Eastern Cape for a number of reasons, but particularly for it’s sense of isolation, and real connection to nature and wildness. It’s location between specific mountain ranges and bordering hills makes for this uniqueness and gives visitors a real sense of the past geography and splendour of Africa.

We have read with great concern the plan for a wind farm on the southern border of Kwandwe, and the potential impact of unsightly turbines on the horizon. If implemented this would mean that nearly every game drive would be punctuated by the distant, or close up, sight of turbines, and would certainly disturb the sense of isolation that is so unique to the Kwandwe experience.

We believe that this in turn will directly impact the attractiveness of Kwandwe to both foreign and local visitors, with further direct impact on the employment and community enhancement that Kwandwe provides, and ultimately on the wider conservation efforts that Kwandwe contributes to.

Would the nature and type of infrastructure that is visible from Kwandwe be of relevance to your visual / aesthetic experience of the landscape? *Sadly, it would have a huge impact. 😞😞😞*

Would being able to see a windfarm during both the day and the night (due to red electronic aviation warning lights) impact on your choice of destination for a wildlife tourist experience in South Africa? **Nothing will change our love of Kwandwe and we certainly wont look for alternate destinations, but it will lessen the impact of a visit....you will feel that you just cannot escape the city** 😞😞😞

How would the visibility of windfarms from within Kwandwe Game Reserve impact on your decision to visit Kwandwe? **Same answer as 2 above** 😞😞😞

Yes, maybe the construction of a windfarm would have some short term effects, but in no way would that be a detriment to our returning to Kwandwe. If it did not affect the animals and their habits, seeing the windmills day or night would not be a hindrance to our return. I worked on oil drilling rigs for 25 years and these same things came up numerous times. As long as the animals were undisturbed, we would not object to seeing Kwandwe again. Thank you for your inquiry.

We have been to Kwandwe twice now, The first time by ourselves and the second time with our two grandchildren. We have also been to Pumba twice and Shamwari. The real attraction of Kwandwe is the feeling that one is really in the Bush, with little of modern civilization to impact on the experience, so we would things to stay as they are. However, to answer your specific questions, seeing windmills on the horizon, breaking its line would really impact the enjoyment. Being against the background of other hills would be preferable. It also depends on the direction, being visible from the patio at Sunset and night-time would be bad, just occasionally seeing them during drives might be acceptable.

Their presence could possibly influence whether we visit again or not, though most other reserves also have the N2 visible.



Further to the proposal in the vicinity of Kwandwe, a truly magnificent wildlife, breeding and Conservation reserve, we, as frequent guests, wish to contribute with great shock, that it would be of utmost interest to final outcome on wind turbines being finalised to please seriously consider that aesthetically this will completely change the unspoilt landscape of Kwandwe Game Reserve. These turbines in number, would be very relevant to this unspoilt natural landscape environment as will clearly visible to all who visit Kwandwe Game Reserve time and again. These proposed huge wind turbines would impact anyone wishing to visit this magnificent preserved land and true African Wildlife experience due to huge and obvious change to the visible landscape of the area.

Our future choice to visit Kwandwe Game Reserve and enjoy this amazing reserve would most certainly be impacted by fact that there could possibly be turbines visible day and night - being frequent visitors to the beautiful Eastern Cape, we are familiar with other turbines around the Eastern Cape - both the continual noise and red light shining off these at night would further put Kwandwe Game Reserve at the bottom of the list of the peace and tranquility a true Game Reserve offers. The proposed change huge turbines would make to this environment, would most certainly impact overseas tourists looking for the best true wildlife experience Kwandwe Game Reserve offers to guests. Future Tourism to Kwandwe Game Reserve, presently sought after as one of the best experiences in South Africa, would be seriously impacted from within and out of our Country and for one would look to alternative choices for a wildlife experience.

The greatest experience Kwandwe Game Reserve offers to their patrons is the magnificent Wildlife which would also be impacted by turbines as this is a huge disturbance to their natural instincts which everyone wishes to observe both during the day and on night drives, stopping during drives to observe the peace and beauty all around one and getting away from the maddening crowd of what is most people's daily lives! The disturbance to this natural habitat would be detrimental to the large bird and wildlife population with many high value animals Kwandwe Game Reserve produces in the ongoing conservation endeavour. As game farmers we are aware of wildlife behaviour and needs.

Kindly note that Kwandwe is a sought after destination with an amazing foundation supporting many families and all of this could be totally lost for mere fact that people who love to get away, do not want to be confronted with what is alien to the natural habitat of this part of the world. There is no doubt patrons loyal to Kwandwe will look for alternative destinations rather than see the changed landscape which will be a far cry from what is normal in this E.Cape countryside.

Please consider these factors in your E.I.A. of whether it is the right area to place wind farms around such landmarks in the Eastern Cape.

Finally, one of Kwandwe's clients is Steve Lewis-Roberts, who has consented to the disclosure of his personal information:

Thank you for informing us about the proposed Albany Wind Energy Facility. By way of background, it is relevant to note that I am a Chartered Town Planner. I am Senior Director at Pegasus Group, one of the UKs leading planning consultancies, and I have extensive experience of preparing and assessing Environmental Impact Assessments for major development proposals.

My professional opinion is that the proposed WEF will have a significantly adverse visual impact on the Kwandwe Game Reserve. We have visited Kwandwe on many occasions to experience the natural wilderness of South Africa, and there is no doubt that the proposed wind farm will undermine this experience, for the following specific reasons:

- 1. The scale and location of the wind turbines would appear as visually intrusive and alien features in an otherwise undisturbed landscape. This would be harmful to the special character and natural beauty of Kwandwe Game Reserve.*
- 2. The visual dominance of the wind turbines throughout the day and night would inevitably impact on my choice to visit Kwandwe as a tourist destination. To be blunt, the USP of Kwandwe would be undermined as a direct result of the proposed development.*
- 3. The visibility of windfarms from within Kwandwe would mean that unfortunately I would no longer visit Kwandwe to enjoy the unique tourist experience currently offered.*

I acknowledge the contribution that wind farms can make in addressing climate change. Nevertheless, wind farm developments need to be sited in appropriate locations and avoid sensitive landscapes. In this instance, the benefits of wind power should be balanced against the harmful environmental impacts on the natural landscape and the harmful economic impacts on the local tourist industry.

I am content for my personal views to be incorporated into your objections to the proposed development which will result in long lasting damage to the tranquillity and natural beauty of this special area.