



LALIBELA

G A M E R E S E R V E

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10th July 2020

To Whom it may Concern

We are commenting on the Albany Wind Energy Facility, DEFF Ref: 14/12/16/3/3/2/1131 as a concerned landowner, protected area manager and nature and wildlife tourism operator and member of the larger Indalo Protected Environment which has experienced impacts from wind energy development directly.

Indalo is working to expand through further amalgamation of southern, central and northern nodes into large agglomerations of private reserves (>50 000Ha) in central area, and public private partnerships with Addo National Park and Great Fish Provincial Reserves in the south and north respectively with common traversing agreements and unified conservation management.

1 HISTORY / BACKGROUND

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

Like the other Indalo reserves (and many others in South Africa and in Africa in general); Lalibela focusses on nature and wildlife tourism that relies on the wilderness character of the reserve and surrounding area. Lalibela is accordingly protected and managed so as to conserve its natural untrammelled state which forms the basis for visitors to experience the wilds with ecological, geological, and other features of scientific, and/ or historical value in a scenic setting.

Again, like other Indalo reserves Lalibela is looking to expand its area under management and is working actively to link up with neighbouring Shamwari and Pumba reserves to form part of a larger proposed Addo to Great Fish corridor (also referred to as Albany Corridor).

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

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

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2 TOURISM SERVICES

Lalibela offers an African safari experience, and an increasingly rare wilderness experience of being in the bush and experiencing unspoilt scenery characterised by a diversity of landscapes within which to appreciate wildlife and unique vegetation of different biomes.

We offer accommodation in three lodges each in a scenic setting with game drives and views on upland plains, ravines, over valleys, into kloofs, and with vistas looking over high ground and more distant mountains.

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

The accommodation is as follows:

- Kichaka Luxury lodge – 20 beds 5 Star
- Lentaba Lodge – 4 Star 20 beds
- Marks Camps – Family friendly 4 Star 20 beds
- Tree Tops Lodge – Tented camp 4 Star – 10 beds
- Mills Manor - Exclusive use 5 Star – 10 beds

Our **pre-Covid** employment profile is as follows:

151 permanent Employees of which the overwhelming majority are local. We, amongst the other game Reserves in the area, are the biggest employers of local labour as well as the largest benefactors of the local communities. We generate 95% of our total revenue in Forex, while all our profits are all spent locally, with R 0.00 in profits being exported.

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3 IMPACT OF WIND FARM DEVELOPMENT

An important component of an African safari is being in the bush and experiencing the wilderness and the absence of man-made structures such as buildings, telephone lines, electricity pylons, etc. Nature tourism is travel for the purpose of enjoying undeveloped natural areas or wildlife

Wind turbines of the Waainek facility have significantly impacted Kichaka lodge as well as on game drives that cross plateau grassland where turbines now intrude the skyline and at night the pulsing aviation warning lights dominate a part of the landscape. Views from Kichaka lodge look straight over a water hole and upslope onto three turbines in the distance. Although the impact to Kichaka lodge is partially ameliorated by the rich landscape scenery during daylight hours the turbine lights is a significant intrusion in the night and have drawn comment from visitors to the extent that we be implementing special lighting around the lodge and on the water hole so as to distract form the turbine light intrusion.

We note with utmost concern the statement in the SIA that "In addition to this Indalo, Amakhala and Pumba Game Reserves unsuccessfully appealed the Environmental Authorisation ("EA") of the Waainek Wind Farm in 2011. Now that the project has been operational for four years, Amakhala reported no effect on eco-tourism". We interpret the statement to imply that the Waainek WEF has no effect on eco-tourism in the area as "Amakhala reported no effect on eco-tourism" and it is misleading as it fails to qualify that Amakhala which is some 40km away from Waainek (as opposed to Lalibela -with visual impact at 20-25 km away and Pumba -with visual impact 7.5-10km away).

We further take issue with your finding that "Existing turbines do not affect any of the lodges at the game/hunting farms visually" and we would like to put it to you that this can be confirmed as false at the hand of our experience at Kichaka lodge and which the Albany WEF EIA process up to date has avoided to recognise. We can attest to having had to change game drives routes and procedures for avoidance of turbine visual impact, certain routes can now only driven in direction away from Waainek and certain areas can only be traversed in daytime as nigh dives are spoiled by turbine light flicker. We are currently undertaking a major refurbishment of the lodge and one of the primary objectives was an attempt to mitigate and camouflage the intrusive night time lights from Waainek

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



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GAME RESERVE

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4 OBJECTION

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

We herewith we object to the Albany WEF EIR as it is materially deficient and various omissions beguiles the assessment to find the proposed development to be acceptable when in fact it is fatally flawed.

Yours sincerely

Robert Gradwell

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