

ISSUES AND RESPONSES REPORT

1 INTRODUCTION

All issues, comments and concerns raised by interested and affected parties (I&APs) were noted and collated into the Issues and Response Register (IRR). The IRR provides a list of issues raised with regards to the processes and the proposed project. The IRR for this draft Scoping Report (SR) indicates the form and scope of the issues that were addressed during the EIA application process. The proposed project followed an integrated public participation (PP) process.

2 ABBREVIATIONS

DEA&DP	Department of Environmental Affairs and Development Planning
DoTPW	Department of Transport and Public Works
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
I&AP(s)	Interested and Affected Party (-ies)
IPP	Independent Power Producers
IRR	Issues and Response Register
LUPO	Land Use Planning Ordinance
PP	Public Participation
SANRAL	South African National Road Agency SOC Limited
SIA	Social Impact Assessment
SR	Scoping Report
TLM	Theewaterskloof Local Municipality
WC	Western Cape

3 GENERAL

Issue/Concern	Issue raised by	Means of communication	Date	Response
Before construction of the power line over the N2 may commence a wayleave application will need to be submitted to SANRAL, together with the appropriate drawings for approval in terms of the National Roads Act, Act 7 of 1998.	Ms C Runkel SANRAL	E-mail	27 September 2012	Alternatives 2 and 3 will not be considered further in the EIA phase (refer to Chapter 4.4 of the Final Scoping Report). Therefore, none of the Eskom infrastructure would require crossing of the N2. However, the wayleave application form was forwarded to the Eskom project manager for its action, if required.
The Western Cape Department of Transport and Public Works (WC: DoTPW) requires a determination of the impact on its road network during the construction phase of this proposed project. Should any of their roads be crossed a wayleave would be required in terms thereof.	Mr M L Watters WC: Department of Transport and Public Works	Letter	10 October 2012	The R43 may be affected by the proposed development. However, the exact impact on the WC: DoTPW's roads will be considered in the EIA phase. The WC: DoTPW will be contacted and consulted with accordingly.
Additional information is required on the capacities of the substations and transmission lines that are part of the Bacchus network directly affected by Wind Farms currently under assessment.	Mr B McMahon	E-mail	30 January 2013	The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.
All estimated costs are required that are specifically associated with integration of the planned 4 400 MW (rated) of wind energy into Eskom's grid during the period 2013-2022.	Mr B McMahon	E-mail	30 January 2013	The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.
The DEA should examine claims for the connectivity status of Houhoek Substation, Bacchus Main Transmission Station and associated network power lines, which relate to several local Wind Farms currently in various stages of approval (see attached letter of 21 January 2013 to Mark Gordon, DEA).	Mr B McMahon	E-mail	30 January 2013	The concern has been forwarded to the DEA as indicated by the I&AP. It is the responsibility of the DEA to respond to the I&AP in due course.

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<p>The Draft SR is referenced DEA: 12/12/20/2541 and NEAS: DEA/EIA/0000698/2011, although dated Nov 2012. Never having seen the original, I am not able to tell if what I have been sent is the current new Draft SR for the new application. There is no reference to the changes that were presumably made. It was created electronically on 28 Nov 2012, but in the footer of every page the title is Houhoek substation upgrade, although the text relates to a new Main Transmission Station and modifications to the existing substation. The Draft SR second front cover page refers to Report J01887/01, yet every page in the report omits the 01 suffix.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The errors noted were corrected in the Final Scoping Report. It is noted that the report that the I&AP refers to was the first version of the Draft Scoping Report for the proposed project.</p>
<p>The quality of many of the maps is inadequate to properly discern many of the details, and does not present all the existing Transmission and Distribution lines – in particular Figure 3.2. There needs to be more detailed coverage of the area, including Bacchus MTS and the area east of Swellendam containing 4 additional proposed or approved Wind Farms.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The title of Figure 3-2 has been amended to reflect the power lines that connect to the existing Houhoek Substation. This project only covers the Botrivier area, and the approval or otherwise of Wind Farms is not part of the scope of this project. However, the MTS will make provision for a total of four feeder bays (two spare) for Distribution lines. It must be stated that no applications were received by Eskom Transmission to connect any wind farms. This will be described in more detail in the draft EIA Report.</p>

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<p>The EAP should provide clear written evidence that the I&APs registered with the Caledon and Langhoogte Wind Farms have been contacted as potential I&APs for this application. Normal advertising etc is not considered adequate to meet the NEMA requirements for public participation (see DEA&DP guideline on public participation July 2006.)</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The WC: DEA&DP Guidelines for Public Participation (2006) were published in terms of the EIA Regulations (2006). As such, the guidelines have been update to apply to the EIA Regulations (2010). Thus, the WC: DEA&DP Guidelines for Public Participation (October 2011) were consulted and BKS confirms having met the requirements of the guidelines (refer to Appendix B that outlines the full public participation process undertaken to date).</p> <p>The contact details of the registered I&APs for the Caledon Wind Farm and Langhoogte Wind Farm have been requested from the relevant Environmental Assessment Practitioners (EAPs). Once available, these I&APs will be added to the database (Appendix 1 of Appendix B of the Final Scoping Report).</p>
<p>The R8 billion shown for integration of wind power into the grid is by no means the full amount that is additional to that needed for the same total growth over the same period without wind. It is well known that in Europe and UK etc it has been found necessary to construct significant additions to their grids, just to accommodate the variable and unpredictable nature of wind.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>
<p>It is clear if any allowance has been made specifically for gas-fired generating plant to provide fast backup for wind power. There are also the additional costs of running base-load generating plant at reduced power, and therefore decreased efficiency, with consequentially less reductions in CO₂ emissions than would be expected.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>

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<p>Only with some idea of all these associated costs, can wind power be realistically compared with other options. Also, clearly this EIA should not be considered in isolation from the likely cumulative capacity of Wind Farms potentially connected to this part of the grid, whether they are approved yet or not.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>
<p>The basic needs of South Africa can be considered to be a significant reduction in CO₂ emissions, said to be too high now because most electricity is generated using coal, whilst improving socio-economic benefits to the community.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The building of the substation will have no significant impact on the CO₂ emissions whilst in operation. CO₂ emissions for electricity are mainly produced by Eskom Generation. It is the intention of Eskom to diversify in future to include more green technology within Eskom Generation.</p>
<p>It is understood that fair market value is negotiated between Eskom and landowners for servitudes which is based on existing land usage, therefore excluding potential developments being planned but not rezoned accordingly. This could apply to private individuals, Companies or the local municipality. Wind Farms have certainly been responsible for significant decreases in property amenity values, sometimes to the point that some have not been saleable at all, because of turbine noise affects if dwellings are too closer. Farmers and other landowners with turbines located on their property get significant annual payments in compensation, although they may lose some of the 75% rate rebate as a result. These matters should be discussed and assessed in the EIA, possibly with the Community Social Fund that generates a share of the Wind Farm profits for benefit of the local community.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>Eskom will appoint an external land evaluator during the negotiation process. The landowners will be compensated for the servitude and for future loss of income on the servitude.</p>

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<p>How far is Kleinmond and the related Eskom infrastructure from the project site? This was asked in terms of potential Eskom network changes in that area?</p>	<p>Mr E Burger WC: Department of Transport and Public Works</p>	<p>Focus Group Meeting</p>	<p>05 December 2012</p>	<p>The proposed project will not have a direct impact on the 66kV Kleinmond Distribution Substation. The network changes anticipated to the Kleinmond Distribution Substation will not be considered in this EIA process because the former is located approximately 20km south of the existing Houhoek Distribution Substation, which is not the subject of this EIA (only the connection line from the Houhoek Distribution Substation to the MTS is).</p>
<p>The valley within which Botrivier falls, especially the area to the west and south-west of the town, falls in a high risk area with respect to veld fires on a yearly basis. This was noted to be due to the funnelling of wind down from the Houwhoek Pass. It was recommended that Eskom put in place a disaster management plan specific to the proposed site so as to manage all veldfires near the final chosen site.</p>	<p>Mr J Viljoen TLM</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>The risk associated with veld fires in the region is known and will be assessed in the EIA phase. The final design of the substation would also need to take the risk of veld fires into consideration, which will be reflected in an emergency response plan and the Environmental Management Programme (EMPr).</p>
<p>The Municipality will forward the IDP to the consultant for their information.</p>	<p>Mrs J van Rhyn TLM</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>The updated IDP for the Theewaterskloof Local Municipality (TLM) was received and will be incorporated in further detail into the SIA specialist study, which forms part of the EIA report during the EIA phase.</p>
<p>The presence of an industrial node, in the triangle formed by the N2 and the two arms of the R43, was noted south of the town of Botrivier. It was further indicated that a potential link across the N2 will be built in time to link the area to the town. The land-usage was seen as compatible with the substation.</p>	<p>Mrs J van Rhyn TLM</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>The land uses within the study area will be covered in the SIA and the Town Planning specialist studies of the EIA Report.</p>

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<p>The town/regional planning process i.t.o. Land Use Planning Ordinance (LUPO) may be required to be carried out. For Site Alternative 3 this may not be required as much of the area is in the process of being rezoned for Industrial rights.</p>	<p>Mrs J van Rhyt TLM</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>A Town Planning study (Chapter 10.1.7 of Scoping Report) will be undertaken in the EIA phase to determine the town planning requirements for the proposed project. Note that Site Alternative 3 has not been selected for further study during the EIA Phase.</p>
<p>There is a commercial / industrial township to be constructed close to Wildekrans (i.e. south of Botrivier in the triangle formed by the N2 and the arms of the R43, which is approved (authorisation granted) and is to be constructed soon. Subdivision and other related town planning requirements for the development were also approved a while back.</p>	<p>Mr D Marais Wildekrans</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>The development of the commercial/industrial township was confirmed during the Focus Group Meeting with Wildekrans on the 06 December 2012. A Town Planning study (Chapter 10.1.7 of the Final Scoping Report) will be undertaken in the EIA phase to determine the town planning requirements for the proposed project.</p>

4 ROUTE ALIGNMENTS AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>More information should be provided regarding the overall planning for the substation and the surrounding power line network. This will include the proposed routes for the 400kV line and also the proposed position of the 132kV feeder line. The hatched area on the plan is very large and the detailed position of all the power lines will be required to properly assess the cumulative impact.</p>	<p>Mr D Marais Wildeckrans Trust</p>	<p>E-mail</p>	<p>11 October 2012</p>	<p>Refer to Chapter 3.2 for details of the overall planning of the proposed substation. Also refer to Figure 10-1 for the corridors that will be assessed as part of the EIA phase.</p>
<p>In addition to the poor map quality and area coverage there is a major shortage of general information concerning the existing network and substation capacity, in relation to existing planned growth in demand and, in this case, the advent of Wind Farm requirements. The thermal capacity of all the distribution lines from Houhoek substation is required together with the possible connectivity with Wind Farms at:</p> <ul style="list-style-type: none"> • Dassiesfontein/Klipheuwel, Caledon DEA Ref 12/12/20/1746 • Overberg WEF, Swellendam DEA Ref 12/12/20/1798 • Goereesoe, Swellendam DEA Ref 12/12/20/2199 • Kluijieskraal, Swellendam DEA Ref 12/12/20/2201 • Vryheid WEF, Uitkyk DEA Ref 12/12/20/1815/ • Heidelberg. DEA Ref 12/12/20/1815/ 	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The connectivity of the Wind Farms into the existing Houhoek Distribution Substation is not the subject of this EIA process, but should be raised with the EAP for the relevant Wind Farm EIA. However, the MTS will make provision for a total of four feeder bays (two spare) for Distribution lines. It must be stated that no applications were received by Eskom Transmission to connect any wind farms. This will be described in more detail in the draft EIA Report.</p>

Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>The FEIR for the Caledon Wind Farm (243MW capacity initially, now limited to 93MW) states (Executive Summary page 5) that “with the upgraded design of the on-site substation, there is no need for any upgrade of Houhoek substation”. This report was issued in January 2012. The DSR (July 2012) for Langhoogte Wind Farm (140 MW) states that connection would be direct Comment on Houhoek Transmission Station Page 3 30 Jan 2013 to Houhoek – no mention of any upgrade. Both these factual comments are totally contradicted in this current report of Houhoek. Such ‘errors’ are surely reason enough for the above EIAs and this one to be jointly assessed.</p> <p>Notwithstanding the above, this DSR states that both Caledon and Langhoogte facilities are planning for connection to the grid in 2016 but “there is only capacity for one of them”. It is also stated that “Caledon Wind Farm will have to find a route for a double circuit from the north to Houhoek”.</p> <p>As the Caledon Wind project is now awaiting decision, and the Langhoogte one is in the DEIR commenting period, this situation was reported in detail to the Chief Director Integrated Environmental Authorisations, Dept of Environment, Pretoria (Mr Mark Gordon). At the moment, the Caledon Wind Farm report claims that the existing 132 kV power line that passes through the site would be connected direct via the site substation. Eskom claim that this is not possible and that a new route must be found to connect to Houhoek, which must then be assessed for impacts.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The connectivity of the Wind Farms into the existing Houhoek Distribution Substation is not the subject of this EIA process, but should be raised with the EAP for the relevant Wind Farm EIA. However, the MTS will make provision for a total of four feeder bays (two spare) for Distribution lines. It must be stated that no applications were received by Eskom Transmission to connect any wind farms. This will be described in more detail in the draft EIA Report.</p>

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<p>The Eskom national forecasts in the Transmission Development Plan for 2013-2022 show a growth in demand of 15,800 MW to a total of 57,800 MW in 2022. Included will be 4400 MW of wind energy generation (rated capacity) comprising blocks of 100-200 MW in the Western and Southern Cape. In terms of useful average generated power, this is 1100-1650 MW. The total costs estimate for the period is nearly R175 billion, largely expansion and refurbishment of transmission lines and stations.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>It is correctly confirmed that Eskom allowed for integration of renewable energy in the Transmission Development Plan (2013-2022). This is in line with the strategy from the Department of Energy to support clean generation technologies. Allowances are made for shared infrastructure assets and not infrastructure assets that are dedicated to the Independent Power Producers (IPP).</p>
<p>The alternatives considered to be feasible are:</p> <ul style="list-style-type: none"> • Mandatory demand management across industry and domestic sectors, including solar water heating and stepped tariffs for all consumers (including municipalities). • Much wider and more urgent usage of natural gas for base-load generation of electricity (producing only 50% of the CO2 that coal produces for the same power generated). • Selection of other suitable Wind Farm locations in the Cape to suit the existing grid capacities, with minimum connection and integration costs. • The No-Go option should cater only for the planned growth in demand on this part of the Bacchus/Houhoek network, excluding wind farms. • Comparative assessment of connection of the local Wind Farms to all existing nearby lines, including the 400 kV line from Bacchus. 	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>Demand side Management alternatives and the No-go alternative are described in Chapter 4.2 of the Final SR. Refer to Chapter 3.2 of the Final SR for the need and desirability of the project.</p>

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<p>Many of the problems associated with integration of wind energy stem from the apparent absence of any planning based on a regional strategic plan that would have coordinated the Regional methodology for Wind Farm site Selection (DEA&DP, 2006) with “connectivity” to Eskom’s network. It is interesting to note that a report as recent as the Transmission Development Plan (2011-2020) considered only the connection of five 100 MW Wind Farms, including Eskom’s Sere plant, to four different Main Transmission Stations (Bacchus being one of these).</p> <p>A Consultant or Specialist, possibly from Eskom, needs to be contracted, in the absence of the relevant technical and commercial experience of the EAP, to participate in the proper assessment of the alternatives.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>Allowances are made for shared infrastructure assets and not infrastructure assets that are dedicated to the IPP. The connection costs for IPP are not included in the Transmission Development Plan (2013-2022).</p> <p>The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>
<p>One of the main questions that must be answered relates to the additional costs to the developer and to Eskom from the connection in particular of Langhoogte and Caledon Wind Farms, including all the necessary upgrading, new Main Station and power lines.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The connectivity of the Wind Farms into the existing Houhoek Distribution Substation is not the subject of this EIA process, but should be raised with the EAP for the relevant Wind Farm EIA. The main purpose of the proposed Houhoek MTS project is to cater for normal load growth in the area. The costs associated with any possible connections either to the existing Houhoek Distribution Substation or the proposed Houhoek MTS will be borne by the IPP themselves.</p> <p>The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>

Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>No Wind Farm developer has been coerced into selecting any particular site. Neither Eskom nor the electricity consumer should be forced to pay for the development at the wrong location. In the case of these two Wind Farms specifically, local residents and the tourism industry are also being forced to accept locations that are environmentally unsuitable, which should never have been applied for in the first instance.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The connectivity of the Wind Farms into the existing Houhoek Distribution Substation is not the subject of this EIA process, but should be raised with the EAP for the relevant Wind Farm EIA. The main purpose of the proposed Houhoek MTS project is to cater for normal load growth in the area. The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>
<p>Detailed consideration of the 3 alternatives by those present at the meeting.</p>	<p>Mr J Viljoen TLM</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>At the meeting, the site most likely to be feasible was suggested by the I&AP as Site Alternative 3 (either layout), as set close to the existing Eskom Houhoek substation. This was considered by the TLM officials as viable as it fitted best with their municipal planning initiatives. However, upon consideration of the SDF (Figure 7-2), this would be revised to Site Alternative 1 (either layout). Further engagement with the officials from the TLM will occur during the EIA phase, especially via the PP process, the SIA specialist and the Town Planning specialist.</p>
<p>Why is the loop-in and loop-out required? Is it going to increase the Transmission lines within the area?</p>	<p>Mr D Marais Wildeckrans Trust</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>This change is done to strengthen the network around the Cape area; this is done in various areas within the Cape. It was suggested that Mr Marais review the section of the Draft SR with respect to integration into the wider Eskom network.</p>
<p>What is Eskom's intention / purpose regarding the installation of these power lines? There are so many power lines in the area e.g. the power line going to Caledon. Concern was raised that the various power line servitudes are sterilising large areas of land, including the visual impact of servitudes in different areas instead of being clustered.</p>	<p>Mr D Marais Wildeckrans Trust</p>	<p>Focus Group Meeting</p>	<p>06 December 2012</p>	<p>The purpose of this project is to "deload" the Bacchus-Palmiet Transmission Line. Eskom will provide more information regarding the future plans with regard to the installation of power lines and related infrastructure within the area. It is accepted that servitudes should be optimised into limited corridors.</p>

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<p>Another important factor to take into consideration is the management of the power line servitudes during the operational phase. The management of the power line servitudes does have an impact on the outcome of the overall desirability of the development as it determines the long term impacts that the development will have.</p>	<p>Mr R Smart</p>	<p>E-mail</p>	<p>25 January 2013</p>	<p>The operational phase impacts will be considered in the EIA phase and in the EMPr. Refer to Chapter 10.1 for the methodologies of the specialists and Chapter 10.7 for the site-specific EMPr.</p>

5 PUBLIC PARTICIPATION PROCESS AND RELATED ISSUES

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<p>A meeting with the Eskom’s representative has been requested by an I&AP to discuss the overall network planning in the area, as there has been discussion regarding further 132kV lines running from the substation in the direction of Caledon. As Eskom will be aware there is also an application in progress for a substantial wind farm close to Botrivier, which also requires a 132kV line to link it to the Houhoek substation. All these applications and the various impacts will have to be considered in a holistic manner so as to obtain a coherent picture of the cumulative impacts.</p>	<p>Mr D Marais Wildeckrans Trust</p>	<p>E-mail</p>	<p>11 October 2012</p>	<p>The cumulative impact of the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>
<p>I was informed of the availability of the Draft SR by Email on 27 Nov. I requested information on access to the Draft SR (link to a website download) on 6 Dec, repeated on 28 Dec and 8 Jan 2013. The link sent to me did not work. I eventually received a CD on 14 Jan (posted 9 Jan). Effectively, the loss of time on this project, together with the consequentially delayed responses to this comment report, will significantly affect the time available for proper consideration of the Langhoogte Draft EIA Report, for which the commenting period ends on 7 Feb 2013. On this basis an extension of the commenting period for both these affected projects has been requested, with the additional suggestion that this EIA process is delayed until all current Wind Farm applications connected to or affected by Houhoek Main/Substation has been finalised.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The proposed wind farms have reached the EIA phase, whilst this proposed project is still in the Scoping Phase. This EIA process will not be delayed pending the finalisation of the proposed wind farms in the region. The link between the proposed wind farms in the region will be discussed and assessed in the EIA Report.</p>

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<p>The EAP Declaration of Interest is missing as are all the Appendices supposed to have been issued. Therefore, there are no copies of advertisements or Notices, no record of all I&APs, no records of the open meeting or any stakeholder/focus group meetings.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>Appendix A of the draft SR contained a letter from the DEA, which acknowledges receipt of the EAP Declaration of Interest form. As such, the Final SR will include the application form and the Declaration of Interest form. Copies of advertisements and records of the Focus Group Meetings were not available at the time of the draft SR public review period. However, these documents are included in Appendix B (Public Participation) of the Final SR.</p>
<p>The decision to have a peer review is welcome, but it should include the requested correction of the woefully inadequate public participation process thus far, which could be included in the Final SR.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>The recording of the PP Process conducted to date has been updated in Appendix B (Public Participation) of the Final SR.</p>
<p>The DEA&DP advises BKS to use a Xhosa translator for the meetings during the EIA phase, as well as to translate correspondence into Xhosa – this is recommended as not all people within the area understand either English or Afrikaans.</p>	<p>Mrs W Anthony DEA&DP</p>	<p>Focus Group Meeting</p>	<p>05 December 2012</p>	<p>A Xhosa translator will be considered during the EIA phase. For the scoping phase correspondence was done in both English and Afrikaans as these are the languages found in the local newspaper, Theewaterskloof Gazette. Xhosa translations for the newspaper advertisements will also be undertaken for future correspondences.</p>
<p>Which stakeholders have been consulted so far for this project?</p>	<p>Mrs W Anthony DEA&DP</p>	<p>Focus Group Meeting</p>	<p>05 December 2012</p>	<p>All the relevant Western Cape Provincial Departments (DEA&DP, Cape Nature, Transport, Heritage, Settlement: Planning), the Local Municipality (Theewaterskloof) including a range of their sections and councillors, and Affected Landowners. Refer to Appendix 1 of Appendix B (Public Participation) of the Final SR.</p>

6 ENVIRONMENTAL IMPACT ASSESSMENT AND RELATED ISSUES

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<p>The Final EIA Report for the Caledon Wind Farm (243 MW capacity initially, now limited to 93 MW) states (Executive Summary page 5) that “with the upgraded design of the on-site substation, there is no need for any upgrade of Houhoek substation”. This report was issued in January 2012. The Draft SR (July 2012) for Langhoogte Wind Farm (140 MW) states that connection would be direct Comment on Houhoek Transmission Station Page 3 30 Jan 2013 to Houhoek – no mention of any upgrade. Both these factual comments are totally contradicted in this current report of Houhoek. Such ‘errors’ are surely reason enough for the above EIAs and this one to be jointly assessed. Notwithstanding the above, this Draft SR states that both Caledon and Langhoogte facilities are planning for connection to the grid in 2016 but “there is only capacity for one of them”. It is also stated that “Caledon Wind Farm will have to find a route for a double circuit from the north to Houhoek”. As the Caledon Wind project is now awaiting decision, and the Langhoogte one is in the Draft EIA Report commenting period, this situation was reported in detail to the Chief Director Integrated Environmental Authorisations, Dept of Environment, Pretoria (Mr Mark Gordon). At the moment, the Caledon Wind Farm report claims that the existing 132 kV power line that passes through the site would be connected direct via the site substation. Eskom claim that this is not possible and that a new route must be found to connect to Houhoek, which must then be assessed for impacts.</p>	<p>Mr B McMahon</p>	<p>E-mail</p>	<p>30 January 2013</p>	<p>Refer to Chapter 3 of the Final SR for an overview of the proposed project. The proposed wind farms will be assessed as cumulative impacts in the EIA phase for the project.</p>

Issue/Concern	Issue raised by	Means of communication	Date	Response
There is a series of guidelines that DEA&DP uses for their EIAs. The latest series was for 2012 February. This guidelines will be forwarded to BKS.	Mrs W Anthony DEA&DP	Focus Group Meeting	05 December 2012	The guidelines from the WC: DEA&DP were received and will be incorporated in more detail during the EIA phase.
Is BKS using an internal specialist for the geotechnical investigation? If so, BKS will need to apply for exemption in terms of Section 11 of the National Environmental Management Act (NEMA). Similarly for any other non-independent specialists.	Mrs W Anthony DEA&DP	Focus Group Meeting	05 December 2012	The specialist team has been revised to include an independent specialist for the Geotechnical Investigation.
Is Eskom going to apply for the LUPO approvals for the land use (i.e. potential rezoning)? The DoTPW noted that should a LUPO process be triggered that they will comment on that documentation, and will not formally comment on the EIA documentation.	Mr E Burger WC: Department of Transport and Public Works	Focus Group Meeting	05 December 2012	It is uncertain at this time whether a LUPO process will be triggered. The DoTPW is thus requested to make formal comment on the EIA documentation. A Town Planning study (Chapter 10.1.7 of Scoping Report) will be undertaken in the EIA phase to determine the town planning requirements for the proposed project.
How many Specialist studies will be undertaken for this project?	Mrs W Anthony DEA&DP	Focus Group Meeting	05 December 2012	Geotechnical, Soil and Agricultural Potential, Freshwater Ecosystems (including wetlands, dams and drainage lines), Ecological / Biodiversity, Avifaunal, Social, Visual, Heritage, Traffic and Town Planning Assessment. Refer to Chapter 2 and Table 2-1 for a list of the project team (including specialists).

7 WATER QUALITY MANAGEMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
Is Eskom going to apply for the Water Use Licence?	Mrs W Anthony DEA&DP	Focus Group Meeting	05 December 2012	This will be determined later in the EIA process.
Potential water pipeline that may impact on sites was indicated to the BKS team by Western Cape Settlements Department.	Mrs J van Rhyn TLM	Focus Group Meeting	06 December 2012	The proposed water pipeline that links to the reservoir has been included on the locality map and will be considered in the EIA phase.

8 TRAFFIC IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
The DoTPW indicated that all the site alternatives may be impacted on by future proposed widening of the R43 which is scheduled to be upgraded to a 4 lane (2 lanes in each direction) road from its existing 2 lane total status. This will have implications on the servitude width of the road which will increase to between 60 – 90m. This will need to be considered in terms of placement of infrastructure.	Mr E Burger WC: Department of Transport and Public Works	Focus Group Meeting	05 December 2012	The DoTPW will be contacted for further information with respect to this planned widening of the road. This information will be considered in the Traffic Impact Assessment.
Eskom needs to undertake traffic impact assessment and provide access road in the area. Issuing of the authorisation in terms of traffic will not be a problem if the EIA adhered to all requirements	Mr E Burger WC: Department of Transport and Public Works	Focus Group Meeting	05 December 2012	This will be considered in a formal Traffic Impact Assessment. It was noted that should this be done by an internal traffic specialist to BKS that exemption will be requested as per the request from WC: DEA&DP earlier.

Issue/Concern	Issue raised by	Means of communication	Date	Response
SANRAL proposes to build a toll gate on the N2 adjacent to Site Alternative 1 (blue and purple footprints). They have already submitted the offer to purchase a portion of land to with Wildekrans. Information about this will be forwarded to BKS by Mr Marais.	Mr D Marais Wildekrans	Focus Group Meeting	06 December 2012	This will be considered in a formal Traffic Impact Assessment.

9 VISUAL IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
In terms of the visual impact assessment – what is the exact location of the power lines? The current power lines do not give this area a good view. The landowners would be happy if Eskom would consider placing the power lines underground.	Mr D Marais Wildekrans	Focus Group Meeting	06 December 2012	The exact location of the power lines cannot be confirmed at the present moment. However, alternative route corridors for the 400kV Loop-in and Loop-out power lines will be considered in the EIA Phase (refer to Figure 10-1 of the Final SR). It was noted that the impact of underground power lines, although initially attractive, has a significantly larger impact i.t.o. sterilising land and modifying terrestrial ecosystems (refer to Chapter 4.4.3 of the Final SR for further analysis of underground Transmission power lines). In addition, underground lines are not technically possible due to the above-ground configuration of the Houhoek Distribution Station.

10 BIODIVERSITY AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>As indicated in the Scoping Report, the majority of the designated development envelope for the loop-in and loop-out power lines and the alternative substation locations is located within Critical Biodiversity Areas (CBAs). The Scoping Report contests these CBA designations. CapeNature maintains that the CBAs do need to be ground-truthed, particularly on a site-specific scale, in order to verify the designation. In general, a conservative approach was used in classifying areas as CBAs. It should be noted that some relatively degraded CBAs are selected for their importance for connectivity on a regional scale. Also, in Critically Endangered vegetation types, where only a very small proportion of the vegetation type remains (e.g. most renosterveld types), even the degraded remnants are of conservation importance.</p>	Mr R Smart	E-mail	25 January 2013	Refer to Chapter 10.1.4 of the Final SR for the terms of reference for the Ecological Assessment. The CBAs identified during the scoping phase will be ground-truthed and assessed during the EIA phase.
<p>The main vegetation type occurring within the development envelope is Kogelberg Sandstone Fynbos, with Western Rûens Shale Renosterveld occurring along the lower boundary, both of which are classified as Critically Endangered. CapeNature therefore recommends that substations, power lines and associated infrastructure is preferably located outside of CBAs, or areas that are identified as highly disturbed by the botanical specialist. As the vegetation types occurring on site are known to contain numerous Species of Conservation Concern, a detailed site survey must be undertaken by the botanical specialist during the peak flowering season (July-October) to ensure that important plant populations are not affected by the development proposal.</p>	Mr R Smart	E-mail	25 January 2013	The sensitive vegetation will be taken into account when assessing the LILO corridors and the location of the substation. Refer to Chapter of the Final SR for further details of the Scoping Alternatives Analysis.

Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>A section of the proposed development envelope for the loop-in and loop-out power lines falls within Houwhoek Nature Reserve (a CapeNature nature reserves). The loop-in and loop-out power lines will link to the Transmission lines that currently traverse Houwhoek Nature Reserve. CapeNature has experienced significant negative impacts in the past when the existing Transmission power lines were built through the nature reserve, with excessive disturbance taking place, particularly the construction of access roads.</p>	Mr R Smart	E-mail	25 January 2013	The disturbance caused by access roads will be assessed in the EIA phase.
<p>Another important factor to bear in mind is the importance of fire as an ecological driver in Mountain Fynbos ecosystems. This must be taken account of in the management of the servitudes, as fire poses a potential risk to the power lines, as well as the power lines potentially resulting in the ignition of fires, which can result in too frequent fires. It is recommended that current issues regarding management of the power line servitudes are resolved as this will be taken into consideration in further comments.</p>	Mr R Smart	E-mail	25 January 2013	Veld fires have been identified as an environmental impact. The impact of veld fires will be assessed by the ecologist, the avifaunal specialist and the social specialist.
<p>CapeNature supports the proposal of the Plan of Study for EIA to undertake the following specialist studies: wetland delineation and assessment, ecological assessment and avifaunal assessment. The above issues must be addressed particularly in the ecological assessment. More detailed site specific mitigation and management measures will be commented upon in the EIA Phase. The EIA report must contain detailed, high quality maps of all the alternatives (substation and power lines) in order to allow for adequate assessment of the potential impacts.</p>	Mr R Smart	E-mail	25 January 2013	High quality maps will be included in the EIA Report. The specialist studies mentioned will be undertaken during the EIA phase.

Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>				