

P U B L I C H E A L T H

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Date: 20 November 2012

Attention: Nicolene Venter

THYSPUNT NUCLEAR 400KV INTEGRATION PROJECT

Reference is made to the notification letter dated the 23 October 2012, 9520 Thyspunt, informing the Nelson Mandela Bay Municipality (NMBM) that the revised Draft Environmental Impact Assessment Report (DEIR) review period has been extended from Wednesday 31 October 2012 to Wednesday 21st November 2012. The Nelson Mandela Bay Municipality Environmental Management Sub-Directorate hereby submits the following comments based on the revised DEIR, all of Environmental Management's formal comments submitted during the Environmental Authorization process and the Nelson Mandela Bay Municipality Conservation Assessment and Plan 2009.

The systematic conservation planning assessment considered the extent of loss of natural features in terms of biodiversity pattern, ecological processes, species of special concern and habitat riverine integrity due to various land uses. The assessment considered options for conserving a representative proportion of all biodiversity in the NMBM and derived a conservation network of optimal Critical Biodiversity Areas avoiding the NMBM's land use requirements.

During interactive consultation processes with the Nelson Mandela Bay Municipality, an alternative route Option 2 to the south of Kwanobuhle and through the new proposed private housing development adjacent to Kwanobuhle was identified on the basis that it would have to meet both technical requirements and avoid developments within the broader area.

Both route options have been highlighted as a Critical Biodiversity Area (CBA) in terms of the 2009 Conservation Assessment of the Nelson Mandela Bay Municipality. Further investigations have confirmed that that option 2 is more environmentally sensitive than route option 1 through the open area in the middle of KwaNobuhle.

The proposed sites that were identified for the Port Elizabeth substation is positioned within a CBA. The ecological assessment undertaken as part of the integrated Jachtlakte development confirms the conservation value of the Critical Biodiversity Area.

Environmental Management has been an active participant throughout the duration of the Environmental Authorization process and has consistently requested that the Environmental Assessment Practitioners overlay the proposed Thyspunt corridors and Proposed Port Elizabeth Substation Sites with the Nelson Mandela Bay Municipality Open Space System Critical Biodiversity layers. The NMBM has an obligation to achieve conservation targets and therefore we insist that the viability of the CBA corridor be taken into consideration to determine the final positioning of the substation. The size of this infrastructure will contribute immensely to the fragmentation of the CBA network.

The Nelson Mandela Bay Municipality's preferred option within the Kwanobuhle area remains option 2. Despite this fact we cannot ignore that option 2 is more ecologically sensitive than option 1. We therefore recommend that the Environmental Assessment Practitioner considers this in the final report. We request that issues be addressed and adequately mitigated.

Yours faithfully



JORAM MKOSANA
DIRECTOR: ENVIRONMENTAL MANAGEMENT
PUBLIC HEALTH DIRECTORATE