



## environmental affairs

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REPUBLIC OF SOUTH AFRICA

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### **COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED INSTALLATION OF A 66KV OVERHEAD POWERLINE AND NEW SUBSTATION ON FARM 305/16 EAST OF THE BITOU RIVER, WESTERN CAPE.**

Your draft Basic Assessment Report for the above-mentioned activity, with reference number: DEA REF: 14/12/16/3/3/1/570 has referenced.

The Chief Directorate: Integrated Coastal Management (ICM) appreciates the opportunity given to comment on this Draft Basic Assessment report. The Chief Directorate: ICM has identified issues that need to be considered and these are outlined below.

The proposed substation site (RE/305/16) and the power line will cross over the estuary (line 305/15), and this is a very sensitive area. According to the Principles of National Environmental Management Act (Act107 of 1998), developments must be environmentally sustainable taking into account the principle of sustainable development which requires the consideration of all relevant factors that include the following:

- (i) That the disturbance of ecosystem and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied.
- (ii) That pollution and degradation of the environment are avoided, or where they cannot be altogether avoided, are minimised and remedied.

It is also important to take into account the sensitivity, vulnerability of ecosystems such as coastal shores, estuaries and wetlands especially where they are subjected to development pressure.

We have concerns on whether the changes on the floodline were taken into consideration. The Situation Assessment Report recommended that no new developments should take place within the risk area – this could be the 1:100 year floodline or below the 5 m contour.

The draft basic assessment report does not mentioned any possible impacts of climate change, noting that the development will be situated close to the flood line of the Bitou River. You are advised to note that section 63 of the Integrated Coastal Management Act (Act 24 of 2008), lists certain aspects to be considered when dealing with Environmental Authorizations. One of these aspects is that any coastal development should take into account the possible impacts of coastal environmental processes on the proposed activity and this has to take into account the cumulative effect of the impact.

It will be of importance to consider that the Bitou Estuary has a wide floodplain connected to the estuary by numerous tidal creeks and the largest area of salt marsh occurs on these floodplains. The Present Ecological State (PES) – Category **A/B** and the area in terms of Ecological Importance and Sensitivity (EIS) is very **high**.

Considering the above, during the construction phase there are things that need to be considered and these are:

- (i) Indicate the methods to be used during the installation of power lines that will outline the process to avoid trampling on the estuary salt marshes.
- (ii) It is also important to give clear details on the mitigation measures that will be taken to minimise damage on the estuarine vegetation.

According to the gazetted National Estuarine Management Protocol, an estuary must be managed to avoid, minimize or mitigate significant negative impacts but are not limited to reduce water flows and loss of habitat or species. Any developments on the estuary must maintain the current ecological state.

The coordinates provided on the report when plotted on GIS indicate that the proposed overhead power line is 6.4 km and not 2.5km. Again in the activity description the approximate proposed overhead is 5km - clarity is required on how much kilometres the proposed activity will occupy. The information will

assist the department in giving fair impact valuation of the proposed activity to the receiving environment.

The Situation Assessment Report (Keurboms/Bituo) indicates about 29 fish species and sea horse might reside in these estuaries. A study might be very useful in understanding the impacts of the development on fish. The avifauna study indicated the importance of the wetland to birds but the mitigation measures are very limited and brief. Please note that Table 4 is not stipulated clearly- (cross-refer (i, ii, etc are missing).

It is strongly recommended that the proposed activities should be undertaken in a manner that will minimize negative impacts to the coastal environment and must take into account the Duty of Care provisions of section 28 (4) of The National Environmental Management Act (Act107 of 1998), which provides that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in as far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment. Further details on this can be found on the department's website.

Kindly note that the department reserves the right to revise initial comments and request further information based on any additional information that might be received.

Please be advised that all future correspondence and documents to our offices must be addressed to the office of the Chief Director: Integrated Coastal Management and Development (CD: ICM).

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Should you require further clarity please do not hesitate to contact us.

Regards



A handwritten signature in black ink, appearing to read 'R Omar', is written over a horizontal dotted line.

Dr. R Omar

Chief Director: Integrated Coastal Management

Department of Environmental Affairs

Date: 6/05/2013