



## SCIENTIFIC SERVICES

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SSD ref. #	<b>14/2/6/1/6/1_BITO/305/16_2012/097</b>
date	<b>6<sup>th</sup> of August 2012</b>

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**Attention: Ms Rachelle Stofberg**

### **APPLICATION IN TERMS OF THE NEMA EIA REGULATIONS FOR THE PROPOSED CHANGE OF LAND USE BY CONSTRUCTION AND INSTALLATION OF A 66 kV TRANSMISSION LINE FROM EXISTING ROBERG SUBSTATION ALONG ROUTE B TO PROPOSED SUBSTATION ON FARM No. 305 PORTION 16 AT SITE C, PLETTENBERG BAY, BITOU RIVER**

**DEA # 14/12/16/3/3/1/570**  
**DEA # 12/12/20/691**  
**NEAS # DEA/EIA/0001209/2012**

CapeNature, as custodian of biodiversity in the Western Cape, would like to thank you for the opportunity to review the proposed change of land use and development activities, and wish to make the following comment. The draft Basic Assessment Report ("BAR") dated 22 June 2012 concerning the abovementioned, received from *SiVEST Environmental* by Scientific Services on the 9<sup>th</sup> of July 2012, refers.

1. The linear development proposal affects the area from the existing Robberg substation north of New Horizons to a proposed substation (3600 m<sup>2</sup>) north of the Bietou River at Farm No. 305 Portion 16 the remainder, situated at the intersection with District Road MR 390 on a small level platform below a cliff face. No route or site alternatives have been assessed as part of this application for environmental authorisation, as an environmental authorisation was granted on 30 April 2010 for the construction of the 66 kV transmission line with an associated substation along one of three route alternatives. This application for Basic Assessment is to include listed activities that were not previously assessed for in the application for environmental authorisation, as highlighted in an appeal, and determine the suitability of the placement of the transmission line within the Bietou River Estuary and High Water Mark of the sea. The transmission line Route 4B follows the National Route N2 over a length of 2.5 kilometres, and will require the installation of seven pylon Towers (see site plan S-WC-11601, by Eskom; dated

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The Western Cape Nature Conservation Board trades as **CapeNature**

Board Members: Prof Aubrey Redlinghuis (Chairperson), Dr Colin Johnson (Vice Chairperson), Ms Francina du Bruyn, Mr Mico Eaton, Dr Edmund February, Prof Francois Hanekom, Mr Eduard Kok, Mr Carl Lotter, Prof Gavin Maneveldt, Mr Johan van der Merwe

2012/04/17). From the site plan it appears that the transmission line will span the Bietou River over 600 metres without additional support bewtten pole 3 and pole 4. Sections of the property are located within the Outeniqua Sensitive Coastal Area Extension (“OSCAE”) boundary, and as such this application is subject to the Outeniqua Sensitive Coastal Area Extension Regulations.

## 2. VEGETATION

The mapped vegetation units<sup>1</sup> occurring at the property are: Cape Coastal Lagoons; Cape Estuarine Salt Marshes (AZe 2); South Outeniqua Sandstone Fynbos (FFs 19); **Vulnerable** Garden Route Shale Fynbos (FFh 9) a threatened ecosystem<sup>2</sup> listed i.t.o. the NEM:BA, with 4% formally conserved containing eight (8) threatened plant species and three (3) endemic species; and Southern Cape Afrotropical Forest (FOz 1: I3) and / or Clumps of **Endangered** Western Cape Milkwood Forest (FOz 6: VI3), the latter two units are also protected in terms of the National Forest Act, 1998 (Act No. 84 of 1998), as amended.

## 3. DESIGNATED SENSITIVE AREAS

Selected remaining areas of natural vegetation and habitat have been designated as either: declared Protected Areas; Critical Biodiversity Areas<sup>3</sup> or Ecological Support Areas, as habitat required as part of the CBA conservation network; in addition to Other Natural Areas. Most of the remaining natural habitat here is a designated **Critical Biodiversity Area** and / or **Ecological Support Area** (see Fig. 1), selected for various criteria.

4. The National Freshwater Ecosystem Priority Areas (“NFEPA”) project has identified strategic spatial priorities for conserving South Africa’s freshwater ecosystems and supporting sustainable use of water resources. The linear development proposal traverses, and is situated within three designated River FEPA’s and associated sub-quatarnary catchment areas, draining towards the *Largely Natural* Bietou River (Present Ecological Status: Class B) or *Largely Natural* Keurbooms River Estuary (PES: Class B). The proposed linear development is also within the estuarine functional zone of the Bietou River Estuary, and within 100 metres of the High Water Mark of the sea (Coastal Public Property zone), which includes rivers with a tidal influence.
5. CapeNature will not support the loss of any threatened ecosystems, neither the transformation of identified sensitive areas (CBA’s / ESA’s / NFEPA’s); and nor incompatible land uses for biodiversity conservation objectives. CapeNature does not usually support development within the estuarine functional zone or within a highly sensitive area coastal area. It is however acknowledged that the 66 kV transmission line and associated substation are required to service development north of the Bietou River; and a limited form of infrastructural installation is permissible within designated sensitive areas based on regional need.

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<sup>1</sup> Mucina L & Rutherford MC (eds) (2006) Vegetation of South Africa, Lesotho and Swaziland. Strelitzia 19. South African National Biodiversity Institute, Pretoria.

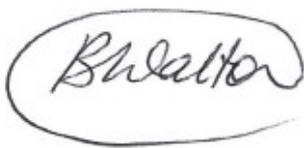
<sup>2</sup> Government Gazette No. 34809, GN No. 1002 (2011) National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004): National List of Ecosystems that are Threatened and in need of Protection

<sup>3</sup> Vromans DC, Maree, KS, Holness S, Job N and Brown AE (2010) The Garden Route Biodiversity Sector Plan for George, Knysna and Bitou Municipalities: Supporting land-use planning and decision-making in Critical Biodiversity Areas and Ecological Support Areas for sustainable development. Garden Route Initiative. SANParks. Knysna.

6. The geotechnical investigation report<sup>4</sup> has stated the terrain at the proposed substation site C is suitable for a foundation, and the surrounding cliff is stable but will require a retaining back wall to prevent rock falls landing on the substation. The Botanical survey<sup>5</sup> conducted for the original assessment confirmed that site C has been previously transformed due to road building activities, and contains indigenous species such as *Cliffortia serpyllifolia*, *Dipogon lignosus*, *Erica sparsa*, *E. versicolor*, *Polygala myrtifolia*, *Sideroxylon inerme* (milkwood), *Stachys aethiopica*, and *Tritoniopsis caffra*. The area is also infested with the Invasive Alien Plant *Acacia mearnsii*, which must be removed from Site C, as well as from the cliff face, to prevent future destabilization, before work is completed here. No similar assessment has been conducted for the founding of pylon towers with the Bietou River Estuarine functional zone, as is required.
7. CapeNature requests for an investigation of the receiving environment within the estuarine functional zone in which the support pylon Towers are to be installed from a geotechnical engineering perspective. Measures to prevent excessive disturbance during construction within the estuarine functional zone need to be expanded upon, regardless of the level of transformation of the floodplain. Please contextualize the assessment i.t.o. the published Fine-Scale Plans concerning the Critical Biodiversity Area conservation network, as well as the National Freshwater Ecosystems Priority Areas map; available at <http://bgis.sanbi.org>.
8. All endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature.
9. CapeNature **objects** to the proposal in its current form.

CapeNature reserves the right to revise initial comment and request further information based on any additional information that may be received.

Yours sincerely



Benjamin Walton  
For: Manager: Scientific Services: Land Use Advice

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<sup>4</sup> Element Consulting Engineers (2008) Geotechnical Investigation Report proposed Bitou Substation

<sup>5</sup> Turner RC (2008) Botanical Survey of proposed Eskom 66kV Powerline *Route 4*, and proposed Sub-station *Site C*, Robberg-Bitou Powerline, Plettenberg Bay.

## CapeNature

### Copies to:

- (1) Dr. A Turner (CapeNature: Knowledge Manager)
- (2) Dr. A Schutte-Vlok (CapeNature: Regional Ecologist)
- (3) Mr. H Nieuwoudt (CapeNature: Robberg / Keurbooms Reserve Manager)
- (4) Mr. P de Villiers (CapeNature: Estuary Programme Manager)
- (5) Ms. C Vermeulen (DAFF: Area Manager Forestry Western Cape)
- (6) Mr. M Nethengwe (Bitou Municipality)
- (7) Ms. L Hendriks (DWA)
- (8) Mr. D Swanepoel (DEA&DP: Land Management)
- (9) Mr H Ottervanger (WCG: District Roads Engineers)
- (10) Mr. V Gibbs-Halls (Eden DM: Environmental Management)
- (11) Ms. M Alant (SANParks: Ecological Planner)

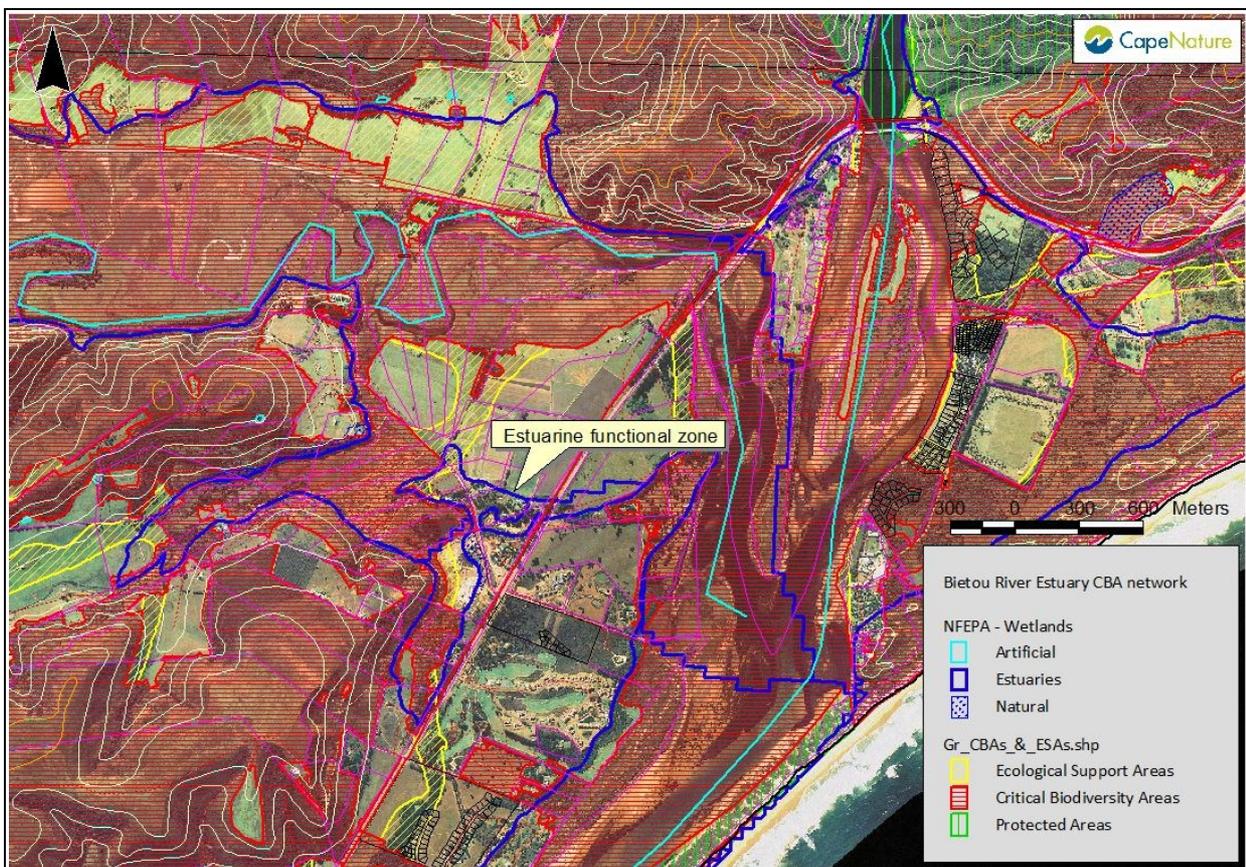


Figure 1: showing the Critical Biodiversity Area conservation network at the Bietou River Estuary, with the extent of the estuarine functional zone shown with a blue boundary.