

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED WESKUSFLEUR SUBSTATION, WESTERN CAPE PROVINCE**

**COMMENT AND RESPONSES REPORT – DRAFT ENVIRONMENTAL IMPACT ASSESSMENT  
REPORT**

**SUMMARY OF ENVIRONMENTAL ISSUES/CONCERNS AND SUGGESTIONS RAISED BY INTERESTED AND/OR AFFECTED PARTIES**

**APRIL 2013 – AUGUST 2015**

- This Comments and Responses Report (C&RR) is a record of all the contributed issues raised by Stakeholders ranging across all sectors of society.
- The name, affiliation (as at that time) and date of the commentator are also indicated.
- The comments under each category have been captured *according to date and time received*.
- Issues raised by technical specialists and Eskom, the project proponent, are not included in the C&RR.

## INDEX TO ISSUES IN THIS TABLE

1.	<b>General</b> .....	Error! Bookmark not defined.
2.	<b>City of Cape Town</b> .....	Error! Bookmark not defined.
3.	<b>Cape Nature</b> .....	Error! Bookmark not defined.
4.	<b>Western Cape Provincial Government</b> .....	Error! Bookmark not defined.
5.	<b>Land Owners</b> .....	Error! Bookmark not defined.
6.	<b>Melkbosstrand Ratepayers Association (MRA)</b> .....	Error! Bookmark not defined.
7.	<b>Heritage</b> .....	Error! Bookmark not defined.
8.	<b>Nuclear 1</b> .....	Error! Bookmark not defined.
9.	<b>General Comments/ Issues</b> .....	Error! Bookmark not defined.

### ABBREVIATIONS USED IN THIS ISSUES TRAIL:

<b>AIS</b>	Air Insultated Substation	<b>DAFF</b>	Department of Agriculture, Forestry & Fisheries
<b>CV</b>	Curriculum Vitae	<b>EMPr</b>	Environmental Management Plan
<b>EIR</b>	Environmental Impact Report	<b>GIS</b>	Gas Insulated Substation
<b>GIL</b>	Gas Insulated Line	<b>POS</b>	Plan of Study
<b>EAP</b>	Environmental Assessment Practitioner		

Issue/Comment	Raised By	Response
<b>1. General</b>		
<p>Please register me as an interested and affected party DEA Ref no: 14/12/16/3/3/2/508 NEAS Ref:DEA/EIA/0001780/2013 Kind Regards</p>	<p>Trevor Moodley Quality Control Inspector (Mech/Corr) Eskom(Koeberg Nuclear Power Station) Correspondence received: 24/04/2013</p>	<p>Lionel Skeffers response on: 25/04/2013 Good day Trevor Thank you for your interest in the proposed project. You will be registered on the database for this proposed project. Kind regards</p>
<p>As an environmental consultant working for the City of Cape Town in the nearby area, please could I request a copy of the BID. I assume that the BID provides proposed locations for the substation? I am looking for the Eskom Weskusfleur Sub-station project?! You sent me something else.</p>	<p>Jonathan Crowther Pr.Sci.Nat., CEAPSA Managing Director CCA ENVIRONMENTAL (Pty) Ltd • Consulting Services Correspondence received: 25/04/2013</p>	<p>Lionel Skeffers response on: 25/04/2013 Hi Jonathan Herewith the BID. May I register you as a I&amp;AP on the proposed project?  Apologies, herewith the correct project documentation</p>
<p>Considering the existing EIA process re a proposed Landfill facility on the farm Brakkefontein, Alternative site 4, as well as a 'Parked' (by the minister) Solar Plant EIA process on the same property, it is our respectful view that it will be unlawful for DEA to authorise a substation etc on the same property in these circumstances. It would be a breach of the cooperative governance Provisions of the Constitution. It is also a breach of the EIA regulations. Alternative sites 1, 2, 3 &amp; 5 are all on Eskom land, while Alternative 4 is on private owned property. The substation should be built on Eskom land.</p>	<p>H.L. Brandt BCD Town Planners Correspondence: emailed on 3 July 2013</p>	<p>Lionel Skeffers response on: 27/08/2013  Good day I trust you are well- Kindly note that you have been registered on the Proposed Weskusfleur Substation project database  Comment noted and will be taken in consideration.</p>
<p>In reviewing the documentation provided re the proposed substation, mention is made of a registration form that is required to be submitted. This form is not available on the email addressed to myself and the website address leads to a still to be released</p>	<p>Harry Roberts Aviation Obstacle Assessor Air Navigation Services</p>	<p>Kindly note that you have been registered on the Proposed Weskusfleur Substation project database and registration form supplied to you.</p>

Issue/Comment	Raised By	Response
page. Would you provide the required registration form for our records please. In the interim, the CAA would be registering as I&AP via the Acting Manager AOG, Mr Koos Pretorius, telephone 011 545 1066, emailpretoriusk@caa.co.za.	Correspondence: emailed on 9 July 2013	
Thank you for the information supplied. As the proposed project does not affect any airspace in the vicinity of theplanned sub stations and appears to be contained in an already declared, the Civil Aviation Authority willberegistering as I&AP in this instance.	Harry Roberts Aviation Obstacle Assessor Air Navigation Services Correspondence: emailed on 9 July 2013	Comment noted.
Mr Situma agreed that you can include him on your database. Contact Details for Mr Situma's office: Mr Lanfranc Situma Tel: (012) 309 3713/3418 Fax: (012) 309 3437 Email: situmal@dot.gov.za Ms MmuleMakhura-(Director) Tel:(012) 309 3741/3889 Fax: (012) 309 3437 Email:MakhuraM@dot.gov.za	SakhileNzimande Department of Transport [NzimandS@dot.gov.za] Correspondence received: 10/07/2013	Comment noted.
Please note that SANRAL has no comments with regard to this application as a national road will not be affected. It istherefore not necessary to register SANRAL as and I&AP for this particular project.	Ms Colene Runkel SANRAL Statutory Control- Western Region Correspondence: emailed on 16 July 2013	Comment noted.
Hi Lionel,	Michelle Herbert Eskom Koeberg	Lionel Skeffers response on: 29/07/2013 Good day Michelle

Issue/Comment	Raised By	Response
<p>Please direct me to where I can find the DSR. I can't find on the link provided below.</p> <p>Many thanks,</p>	<p><a href="mailto:HerberMi@eskom.co.za">[mailto:HerberMi@eskom.co.za]</a></p> <p>Correspondence received: 29/07/2013</p>	<p>I trust you are well, please see below link as requested <a href="http://www.lidwala.com/expertise/environmental-planning-and-scientific-services/eskom-ei/">http://www.lidwala.com/expertise/environmental-planning-and-scientific-services/eskom-ei/</a></p> <p>Also note that the DSR is also available at the venues as indicated on the Notification letter which include the Koeberg Visitors Centre.</p>
<p>I have recently come across an EIA application for the Weskusfleur substation. Unfortunately it is in Afrikaans, and at this high level of language I am unable to translate it sufficiently for my complete understanding. Please can you send me any and all related information in English.</p> <p>Thank you very much for the information. I really appreciate it. I am the chairperson of the Koeberg Public Safety Information Forum and I liaise closely with the Melkbosstrand Ratepayers Association. Please keep me on your database.</p>	<p>(Mrs) SM La Grange Melkbosstrand Ratepayers Association</p> <p>Correspondence: emailed on 3 August and 17<sup>th</sup> of August 2013</p>	<p>Marinus Boon response:</p> <p>Hi Mrs La Grange,</p> <p>I only found your email now in my junk email box. I will forward you the latest project correspondence in another email. We will also register you on our database if you are interested. We had our public meeting and open day earlier this week for the public review period of the Draft Scoping Report, but there is still time for comments until the 02 September 2013 when the 40 day review period end. Please refer to the details in the latest correspondence forwarded to you.</p> <p>You have been registered on our database for the Weskusfleur Substation project</p>
<p>Good Day,</p> <p>The attached documents refer.</p> <p>Please receive my application for acceptance as an I&amp;AP regarding the Proposed Weskusfleur Substation EIA.</p> <p>Kind Regards</p>	<p>Raymond Williamson. 'CoCT. Ward Committee Representative (Ward 23)'</p> <p>Correspondence received: 17/08/2013</p>	<p>Lionel Skeffers response on: 22/08/2013</p> <p>Good day Mr. Raymond Williamson</p> <p>I trust you are well-</p> <p>Herewith please be advised that you are now registered on the Proposed Weskusfleur Substation Project as an- Interested and Affected Party.</p>

Issue/Comment	Raised By	Response
<p>Please note that the South African National Roads Agency SOC Limited (SANRAL) is not an I&amp;AP in this process as the application does not border onto a national road.</p>	<p>Ms Colene Runkel Statutory Control- Western Region Correspondence: emailed on 7 August 2013</p>	<p>Comment noted.</p>
<p>Thank you for your notification. Please note that the N7 in the vicinity of Koeberg is a Provincial road and you are advised to request their comments. SANRAL is not an I&amp;AP in this project.</p>	<p>Ms Colene Runkel Statutory Control- Western Region Correspondence: 28/08/2013</p>	<p>Lionel Skeffers response on: 03/09/2013 Good day Ms Colene Runkel Your comment has been noted.</p>
<p>We are a community newspaper and normally place these adverts at a reduce rate – we serve Atlantis, Mamre, Darling, Phillidelphia, Melkbosstrand, Witsand, Pella, Duynfontein and farming communities in all three WC official languages.</p> <p>We have three other community publications in our group – please see attached profile. Please would you send me document how to be placed on your data-base of suppliers for future adverts.</p>	<p>PETER LATEGAN Publisher / Managing Editor Impact 24/7 Correspondence: emailed on 22 August 2013</p>	<p>Comment noted.</p>
<p>I would anticipate that the Braakefontein 32 site would probably be Eskom's preferred site because it would entail the least transmission lines alterations, including additions and route changes. I am assuming here that there are no problems with rare indigenous vegetation to be considered, and that this site isn't subject to flooding.</p>	<p>R Mike Longden-Thurgood Retired from Eskom Koeberg Correspondence: emailed on 23 August 2013</p>	<p>Lionel Skeffers response on: 23/08/2013 Good day Mr. Mike Thurgood I trust you are well- We did managed to open your attachment with your comments. You are registered.</p>

Issue/Comment	Raised By	Response
<p>I have no concerns over the necessity for the additional "strengthening" of the ability to guarantee power supplies to the KNPS in the event of some incident.</p> <p>Thus the accident which occurred at the Fukushima Dai-Ichi NPS in Japan in March 2011 (which would appear to have been elevated to the second worst accident involving the nuclear power industry, after Chernobyl) has changed the concepts, internationally, about nuclear safety as specifically applied to nuclear power generating plants, with additional potential safety concerns requiring to be applied.</p>		<p>Comment noted and will be taken in consideration.</p>
<p>Sorry I cannot comment at this moment in time as I don't have enough of the relevant information to make an informed decision on these proposals.</p>	<p>Robert Mayhew Correspondence: faxed on 26 August 2013</p>	<p>Comment noted.</p>
<p>I would like to register as a stakeholder for the proposed Weskusfleur Substation EIA process Lidwala is currently running in the vicinity of the Koeberg Power Station (DEA Reference Number: 14/12/16/3/3/2/508).</p>	<p>Kirsty McQuaid Environmental Scientist: SRK Consulting Correspondence: emailed on 5 June 2015</p>	<p>Kindly note that you have been registered on the Proposed Weskusfleur Substation project database.</p>
<p><b>2. City of Cape Town</b></p>		
<p>Please register the City of Cape Town: Environmental &amp; Heritage Management Branch (this office) as the official City of Cape Town commenting entry and exit point pertaining to this project as follows: In the interim the following comment is raised with regards to the BID:</p>	<p>MornéTheron Senior Environmental Professional: Environmental and Heritage Management: District B &amp; C Environmental Resource Management Department (ERMD)</p>	<p>Comment noted and will be taken in consideration. The City of Cape Town: Environmental &amp; Heritage Branch have been registered on the database as the official commenting point.</p>

Issue/Comment	Raised By	Response
<p>1. Proposed Terrestrial fauna &amp; flora specialist study: It is understood that Mr Simon Todd (Simon Todd Consulting) has worked mainly as a research ecologist in arid systems (i.e. the Nieuwoudville area). As such it should be ensured that the appointed qualified botanist is familiar with the local vegetation types and species. Surveys must be conducted in the late winter-spring period when ephemerals are visible and can be identified.</p> <p>2. Previous detailed Botanical studies were undertaken by Nick Helme Botanical Surveys on the subject site (CapeFarm 34) as part of the (1) Eskom Training Facility EIA and the (2) proposed second nuclear power plant EIA should be consulted as part of the botanist's Terms of Reference.</p> <p>3. Attention is drawn to Condition 1.46 of the Environmental Authorization (DEA&amp;T/12/12/20/997, dated 23/11/2010) pertaining to the Koeberg Training Facility that states: <i>'Further, before any development on Cape Farm 34 is sub environmental authorisation, the applicant must submit its managen for its private nature reserve to CapeNature for approval and must enstewardshipafreement with CapeNature'.</i></p>	<p>Correspondence: emailed on 27 May 2013</p>	
<p><u>PT question:</u> If only 2 alternatives are viable, what is the point of looking at all 5 alternatives?</p> <p><u>MT comment:</u> To save time of I&amp;AP's, further studies should be done only on the 2 viable alternatives (1 and 4) and that the edited technical analysis summary table should be included in the final environmental scoping report.</p>	<p>FOCUS GROUP MEETING HELD ON Tuesday, 13 August 2013, 11:00 Milnerton Library Auditorium</p>	<p><u>Response by MG:</u> At start-off all the alternatives were viable and as the EIA process continued it produced that only 2 alternatives are technically preferred. A technical analysis of all the alternatives was undertaken the same period as the scoping studies was undertaken.</p>



Issue/Comment	Raised By	Response
<p><u>RS question:</u> What alternatives will go into next phase?</p> <p><u>MT question:</u> What does the abbreviation GIL stands for?</p> <p><u>MT question:</u> Stating that a stewardship agreement between Eskom Holdings SOC Ltd and Cape Nature is required for the proposed development.</p> <p>“The Environmental Authorization (12/12/20/997) and subsequent City of Cape Town appeal approval on 23/11/2010 led to the inclusion of Condition 1.46 which states: <i>‘Further, before any further development on Cape Farm 34 is submitted for environmental authorization, the applicant must submit its management plan for its private nature reserve to CapeNature for approval and <u>must</u> enter into a stewardship agreement with CapeNature.’</i> MT pointed out in the meeting that both the draft scoping report and the presentation did not pertinently highlight that Condition 1.46 has not been met yet. The opinion was also held that it would therefore be problematic if the Weskusfleur EIA process is conclude without the said Condition being met (i.e. finalization of the Stewardship</p>		<p><u>Response by MB:</u> The preferred alternatives will only be indicated in the Final Environmental Scoping Report as to also take the full public review period in consideration.</p> <p><u>Response by MB:</u> It stands for Gas Insulated Lines.</p> <p><u>AH comment:</u> Gas Insulated Lines are only possible over short distances between Gas Insulated Substation and the power station. This is to avoid any power failures and problems that might occur over long distances.</p> <p><u>Response by MB:</u> States that it is written as “required” in the draft scoping report.</p> <p><u>Response by DJ:</u> Eskom Holdings SOC Ltd is finalizing a document that includes all current and future proposed developments on its land and would from there conclude a stewardship agreement with Cape Nature.</p>

Issue/Comment	Raised By	Response
<p>Agreement). MT expressed the concern that Eskom and the EAP might have 'downplayed' the urgency/necessity to finalize this condition in the draft scoping report."</p> <p><u>RS comment:</u> Recommending that the long term plans for the Koeberg property need to be taken into account in order to finalise the stewardship agreement, and that the details need to be determined through further negotiations between Eskom and CapeNature.</p> <p><u>PT comment:</u> Recommends that a summary of all applications (past, present and future) for development is prepared to be used as a background information tool when presenting to stakeholders.</p> <p><u>MT comment:</u> That updates on biodiversity on Eskom land (Ankerlig) should be on-going on a regular basis to stakeholders and at the moment the last update was a year ago.</p> <p><u>MT comment:</u> That Eskom Holdings SOC Ltd is seen as one applicant for all applications for development.</p> <p><u>MT comment:</u> The determination of a biodiversity off-set should form part of the Ecologist's Terms of Reference</p>		<p>Comments noted and will be taken in consideration.</p>

Issue/Comment	Raised By	Response
<p><u>MT comment:</u> TOR for both Geohydrology and Freshwater studies should refer to detailed studies done for Koeberg Training Facility.</p> <p><u>CB question:</u> What are the hazardous chemicals and how will it be stored before and during operation for this proposed development?</p> <p><u>MS question:</u> Is the proposed project expected to impact the timing of the construction of the new Eskom – City intake point at Atlantis? Will a builders supply be required from the City and if so, how large?</p> <p><u>MT comment:</u> Alternative 4 for this proposed development is in the City of Cape Town's biodiversity network and needs to be retained as botanical area.</p> <p><u>PT comment:</u> Register Melkbosstrand Ratepayers Association as I&amp;AP on project.</p> <p><u>MS question:</u> Can the parking area at Koeberg Power Station be included as a viable alternative 1 (B) for GIS option, provided that the existing power lines' position does not renders such an option impractical?</p>		<p><u>Response by MB:</u> Comments noted.</p> <p>Response MB: Large quantities of transformer oil will be temporarily stored during the transfer into transformers. Smaller quantities of hydro carbons used during construction which can include, fuel, paint, oil etc. will be stored according to legislative requirements.</p> <p><u>Response by AH:</u> This project is not likely to impact on the Atlantis project. The builders supply would be small and could probably be provided from the Koeberg Power Station's LV infrastructure.</p>
<p>Below please find the consolidated comment of the City of Cape town on Draft Scoping Report for the above mentioned application:</p> <p><u>City of Cape Town: Transport Roads &amp; Stormwater: Catchment Management Branch (Melvin James Adonis- Tel: 021 400 3120)</u></p>	<p>City of Cape Town Economic, Environment and Spatial Planning – Environmental Resource Management Department: Environmental and Heritage Management Services: Districts B &amp; C</p>	<p>Comment noted and will be taken in consideration.</p>

Issue/Comment	Raised By	Response
<p>The branch indicated that from a Catchment Management Perspective there is no objection to any of the various alternatives at this stage. However, as the property is larger than 4000m<sup>2</sup> in extent, the submission of a Stormwater Management Plan in terms of the City of Cape Town: Management of Urban Stormwater Policy (2009) at building plan submission stage will be required.</p> <p><u>City of Cape Town: Environmental Health Services- Air Quality Management- (LynelleMatthys – Tel: 021 590 1419)</u></p> <p>From an air quality perspective the following comment is relevant, irrespective of the location alternative that is finally chosen:</p> <p>1.1 Dust control mitigation measures must be implemented during the construction phase in order to prevent dust emission from causing a health nuisance to the surrounding environment and said dust control measures must be documented in the Environmental Management Plan.</p> <p>1.2 No burning of vegetation is to be conducted during the clearing of the erven or during the construction phase of the project. Should it be necessary for open burning to be conducted, application forms for this activity is available from the Air Quality Management office. Application is to be made well in advance of the proposed open burning dates, if necessary.</p> <p>1.3 Should any fuel burning appliances (eg. Stand-by generators) be installed on site, said appliances must be brought to the attention of the Air Quality Management office prior to</p>	<p>Correspondence received on 02 September 2013</p>	<p>Comment noted for consideration within the EIA phase and the compilation of the EMP.</p>

Issue/Comment	Raised By	Response
<p>installation and be operated in accordance with the City of Cape Town:Air Quality Management By-law,2010.</p> <p><u>City of Cape Town:Utility Services: Electrical Department (Mr. Michael Schmidt- Tel: 021 506 3834)</u></p> <ol style="list-style-type: none"> <li>1. The Electrical Department has no objection to any of the proposed site locations. It is cautioned that the provision of construction supply to some of the sites may be a problem. However, as the only really viable option appears to be a GIS within Koeberg Power Station Site, the aforementioned concern no longer appears to be an issue.</li> <li>2. Contrary to the initial perception, as raised during the Focus Group meeting on 13 August 2013, construction of the GIS on the parking area is not an option as the existing power lines cross the entire parking area and an equally large area to the north of the parking area.</li> <li>3. An apparently likely viable solution is to construct the GIS between the existing perimeter fences and patrol track north of the existing power station infrastructure.</li> <li>4. It is cautioned that the position of the substation should be planned and designed such that there is space for an additional nuclear reactor and generator set. The department viewed the opinion that it is an unfortunate fact that additional base load generation capacity must be constructed in the vicinity of Cape Town as Eskom's combined generation and transmission capacity for supply</li> </ol>		<p>Comments noted and will be taken in consideration.</p> <p>The final location for example the GIS at alternative 1 is still to be finalised and the final layout plans/design will affect final positioning. Alternative 1 GIS is planned in the area of the existing perimeter fences and patrol track as indicated in comment 3.</p>

Issue/Comment	Raised By	Response
<p>the Western Cape has reached its limit and construction of additional power lines cannot solve the problem.</p> <p><u>City of Cape Town: Environmental Resource Management</u> (Mr.MornéTheron- Tel: 021 444 0601)</p> <p><u>Background Information</u></p> <p>The current 400kV Gas Insulated System substation at Koeberg Nuclear Power Station is regarded as unreliable, as it has been operating for the past 30 years. As repair is regarded as difficult because of technology constraints, Eskom is proposing a new 400/132 kV substation to be constructed. Six Alternative Options were presented for possible development. All alternatives (apart from Alternative 5) were opted for either AIS (Air Insulated System) or GIS (Gas Insulated System). AIS would have a development footprint of 42ha whereas GIS would have a smaller footprint of 7.4ha</p> <p>The GIS option for Alternative 5 is not possible as this alternative (near Sterrekus Substation) is 7km away from Koeberg Station and because of this far distance and concerns of faulty and problematic impacts on power lines it cannot be accommodated.</p> <p><u>Alternatives</u></p> <p>Alternative 1 to 3 falls within the Endangered Cape Flats Dune Strandveld vegetation type. Alternative 3 has both Cape Flats Dune Strandveld and Atlantis Sand Fynbos. Atlantis Sand Fynbos vegetation has a conservation status of Critically Endangered.</p>		

Issue/Comment	Raised By	Response
<p>Alternative 4 falls within the Critically Endangered Atlantis Sand Fynbos and Alternative 5 in the Critically Endangered Cape Flats Sand Fynbos; however this area is considered transformed (by previous ploughing)</p> <p><u>Environmental specialist findings</u></p> <p>The specialist conducted a desktop assessment therefore no detailed studies were conducted apart from brief site visits. It should be noted that the specialist referred to an outdated version of the Biodiversity Network (2009) and omitted to state that Cape Flats Dune Strandveld is a nationally Endangered vegetation type. The Biodiversity Network (BioNet) is continuously updated and the latest version should be requested from the environmental Resource Management Department of the City. The BioNet also includes a wetlands component which may also be requested. There also is a more detailed vegetation map available for the city area on request.</p> <p>It was assumed that any listed species of conservation concern were likely to be encountered at alternatives with intact vegetation. Atlantis Sand Fynbos is critically Endangered owing to its high density of species of conservation concern. Alternative 4, although invaded by alien acacias has good potential for restoration from the seed bank, and is likely to harbour several of these species. During</p>		<p><u>Response from Ecologist:</u> It is correct that the map was referred to as the 2009 map. However, the actual GIS layer illustrated in the maps in the report are from the recent 2013 Bionet and the reference has been corrected. The conservation status of all the vegetation types at the site are listed in Section 3.1.2. according to the National List of Threatened Ecosystems (2011), including Cape Flats Dune Strandveld. Noted and the map will be requested for the EIA phase. Additional fine-scale vegetation mapping will also be conducted by the consultant as part of the EIA phase of the development.</p> <p><u>Response from Ecologist:</u> The comments and view of the City are noted. However, section 3.4 states "In terms of the different alternatives and the potential of the development to disrupt broad-scale ecological processes, it is clear that</p>

Issue/Comment	Raised By	Response
<p>a preliminary site visit, <i>Leucospermumhypophyllocarpodendron</i> subsp. <i>Canaliculatum</i>, a fynbos species, was observed in alternative 3. The specialist failed to consider the importance of the alternative 4 site for connectivity and ecological functioning in the regional context. From a biodiversity perspective this site is not supported for development.</p> <p>Impacts associated with the development were identified, including the loss of Endangered and Critically Endangered vegetation types, intact vegetation and listed plant species, the disruption of landscape connectivity and ecological functionality; the negative impacts of construction on fauna; habitat loss of avifauna and increased risk of collisions with power lines.</p> <p>No wetlands were found within the affected areas, however the preliminary site visit was done during the dry season. The biodiversity Network indicates several wetlands either on a close to Alternatives 1-3 and potentially Alternative 5.</p> <p><u>Focus meeting with Lidwala Consulting</u></p> <p>During the focus meeting that was held with Lidwala Consulting Engineers, Eskom and Interested and Affected Parties on 13 August 2013, Eskom representatives stated that their preferred alternatives are either Alternative 1 GIS or Alternative 4 AIS, as the other alternatives are deemed technically unviable. It is argued that the final Scoping report should clearly indicate the aforementioned</p>		<p>Alternatives 3 and 4 pose the greatest risks.” Therefore, the Scoping study clearly recognizes the value of Alternative 4 for connectivity and ecological functioning. The additional comments with regards to the long-term security of the Koeberg Nature Reserve as a conservation area have been noted and included in the FSR.</p> <p><u>Response from Ecologist:</u> The plan of study for the EIA states that surveys during the wet season will be conducted to confirm the presence or absence of wetlands within the affected areas.</p> <p><u>Response from Marinus Boon:</u> A separate wetlands study will also be conducted in the EIA phase.</p> <p><u>Response from Marinus Boon:</u> Comments noted. The preferred alternatives that will be assessed in the EIR phase have been indicated in the FSR. In terms of the current technical analysis for all the alternatives, alternative 1 GIS and 4 AIS is the only viable options as indicated in the draft scoping report</p>



Issue/Comment	Raised By	Response
<p>and reduce the amount of alternatives to only the options that are technically viable for further assessment in the EIR phase.</p> <p><u>Concerns to be addressed</u></p> <p>A detailed botanical and freshwater study should be conducted on all proposed sites to identify potential negative impacts on threatened ecosystems (including wetlands), Species of Conservation Concern and disruption of regional ecological connectivity and functioning. A groundwater assessment should also be done to identify any possible impacts on the surrounding aquifers and hence wetlands;</p> <p>All alternatives with their power line arrangements should be clarified and new proposed power lines needed should also be presented. Bird activity should be properly evaluated where these new power lines are required. Presence of fire-requiring vegetation (fynbos and renosterveld) should also be evaluated under new power line routes in order to assess impacts of power line management on vegetation;</p> <p>Be advised that Alternative 4 is considered completely non-negotiable from a biodiversity perspective as it represents the last available north-south ecological corridor between Blaauwberg Nature Reserve and the Dassenberg Coastal Catchment Corridor to the north. It is considered essential to conserve for ecological</p>		<p><u>Response from Ecologist:</u> Noted. These items form part of the activities planned for the EIA and no additional actions are required to meet these concerns.</p> <p><u>Response from Marinus Boon:</u> A wetlands study and groundwater study will be conducted in the EIA phase as indicated in the POS.</p> <p><u>Response from Marinus Boon:</u> Comment noted for consideration within the EIA phase.</p> <p><u>Response from Ecologist:</u> The consultant supports these recommendations in their entirety and these activities will form part of the EIA as suggested.</p> <p>.</p>

Issue/Comment	Raised By	Response
<p>connectivity into the future as Koeberg cannot be considered as a perpetuity conservation area. Eskom as not agreed to enter a Stewardship Agreement for any portion of Koeberg Nature Reserve, therefore none is secure. An ecological corridor needs to be retained in perpetuity between Blaauwberg Nature Reserve and the Dassenberg Coastal Catchment Corridor area to the north. In order to conserve ecological functioning in fynbos ecosystems, a 300m-wide ecological corridor is considered the minimum for a fully functional corridor.</p> <p><u>Terms of reference</u></p> <p>It is requested that the following terms of reference be specified:</p> <p>A table by Eskom listing all Environmental Assessments in this area (past, current and future possible developments) and progress of the past and present environmental assessments must be included in the final scoping report. The aim of the Table will be to illustrate the cumulative extent of Cape Floral Kingdom critical endangered and/or endangered habitat (in square metres) that has been compromised/lost due to Eskom Holdings developments versus the total amount of biodiversity off-set habitat that has subsequently been secured in return;</p> <ul style="list-style-type: none"> <li>The biodiversity specialist must consider local biodiversity pattern as well as regional biodiversity pattern and processes in their assessment. This regard is it cautioned that the appointed botanical-and wetland specialists' comment must to be augmented with specialists with local knowledge of the endemic vegetation.</li> </ul>		<p><u>Response from Ecologist:</u> The concern of the City with regards to Alternative 4 and the long-term security of the Koeberg Nature Reserve has been noted and will be included in any assessment of development within Alternative 4. It is however important to note that the long term security of the land within Alternative 4 is also not secure, and so it is difficult to justify selecting Alternative 4 as a preferred location for the development over Alternative 3 which is currently intact and contains exceptional biodiversity.</p> <p><u>Response from Marinus Boon:</u> Comment noted and will be taken in consideration.</p> <p><u>Response from Marinus Boon:</u> Comment noted. A table indicating the past, current and future possible Eskom developments/EIA's have been included in the FSR.</p> <p><u>Response from Marinus Boon:</u> Comments noted for consideration within the EIA phase.</p>

Issue/Comment	Raised By	Response
<ul style="list-style-type: none"> <li>• Mitigation for potential loss of biodiversity should be presented in order to strive for no net loss of biodiversity;</li> <li>• City biodiversity information and tools (e.g. latest Biodiversity Network, including wetlands, and fine-scale vegetation map) should be consulted;</li> <li>• The studies done on the training centre/facility (<i>DEA reference: 12/12/20/997</i>) should be referred to, as these had essential information about the potential footprint and impacts thereof for future developments.</li> </ul> <p><u>Conclusion</u></p> <p>From the ERDM perspective the preferred alternative is Alternative 5 as it has the least ecological risk and direct biodiversity impacts. However, since this alternative (and others) are, deemed technically unviable, and possibly would be disregarded, it is requested that other alternatives should be brought forward within the Final Scoping Report preferably, that the technically viable and have lower impact on the natural environment.</p> <p>Finally it is reiterate that the Environmental Authorisation (<i>DEA reference: 12/12/20/997</i>) and subsequent City of Cape Town appeal approval on 23/11/2010 led to the inclusion of Condition 1.46 which stated: <i>Further, before any further development on Cape Farm 34 is submitted for environmental authorisation, the applicant must submit its management plan for its private nature reserve to CapeNature for approval and <u>must</u> enter into a stewardship agreement with CapeNature</i>. The draft scoping report does not pertinently highlight that Condition 1.46 has not been met yet. The opinion is thus held that it would therefore be problematic if the Weskusfleur substation EIA process is</p>		<p><u>Response from Marinus Boon:</u> Comment noted and will be taken in consideration.</p> <p><u>Response from Marinus Boon:</u> Comment noted and will be taken in consideration. The DSR state in chapter 8 8.3.4 bullet point 2” <i>A stewardship agreement with Cape Nature is not in place and so this status has not been formalized.</i>” Comments raised in this letter have been taken in consideration in the FSR.</p> <p><u>Response from Eskom:</u> The Koeberg Training and Admin Complex EIA authorisation requires a Stewardship Agreement for the Nature</p>

Issue/Comment	Raised By	Response
<p>conclude without the said condition being met (i.e. finalization of the Stewardship Agreement).</p> <p>All of the comments raised in this letter must be addressed in the final Scoping Report and submitted to this office in the form of 1 hard copy and 1 electronic CD version</p>		<p><u>Reserve to be agreed with CapeNature. A Number of discussions have been held with CapeNature and are still ongoing. No formal agreement has yet been concluded but is being progressed.</u></p>
<p>I confirm that I would like to be registered as an interested and affected party; please find attached a copy of the registration sheet, duly completed, for your attention.</p> <p>Our concerns relate to –</p> <ul style="list-style-type: none"> <li>▪ the impact of the siting of the proposed substation sites on future road network planning; and,</li> <li>▪ the impact of the movement of construction traffic and ultimately the transport of the large transformers (Abnormal loads) on the road network.</li> </ul>	<p>Correspondence received on 02/09/2013</p> <p>Chris Atkins</p> <p><u>C. G. ATKINS PrEng</u></p> <p>Head : Policy &amp; Statutory Compliance Transport for Cape Town</p>	<p>Lionel Skeffers response on 03/09/2013:</p> <p>Good day Chris Atkins</p> <p>We hereby confirm receipt of your e-mail and your comments are noted.</p> <p><u>Response from Marinus Boon:</u> Comments noted for consideration within the EIA phase. A traffic study will form part of the specialist studies in the EIA phase as indicated in the POS.</p>
<p>The application for an EIA for the proposed Weskusfleur Substation in the vicinity of the Koberg Power Station is situated within the 5-10 km Urgent Protective Active Planning Zone (UPZ) boundary of Koberg Nuclear Power Station (KNPS). Attached please find a map indicating the location of the proposed site for Weskusfleur Substation.</p> <p>Eskom Holdings SOC Limited initiated a study to investigate possible alternatives and solutions to address the long term reliability and improvement of the existing 400kV Gas Insulated System substation (GIS) at Koberg Nuclear Power Station. The</p>	<p>E Steyn</p> <p>Head Special Planning and Critical Infrastructure</p> <p>Correspondence: emailed on 4 September 2013</p>	<p>Lionel Skeffers response on: 04/09/2013</p> <p>Good day Amina</p> <p>We have received your comments.</p> <p><u>Response from Marinus Boon:</u> Comments noted for consideration within the EIA phase. A traffic study will form part of the specialist studies in the EIA phase.</p>

Issue/Comment	Raised By	Response
<p>study also includes the future long term 400/132kV transformation requirements at Koeberg.</p> <p>Eskom Holdings SOC Limited core business is the generation, transformation and distribution of electricity throughout South Africa. Electricity by its nature cannot be stored and must be used as it is generated. Therefore electricity is generated according to supply-demand requirements. Being a nuclear power station, it is vital that the reliability of electricity infrastructure associated with this power station is never compromised. The station is also critical for grid stability in the Western Cape.</p> <p>The current 400kV GIS substation was in operation for almost 30 years and there is concerns regarding its its reliability as it are difficult to repair as a result of discontinued technology. There is also no space for additional 132kV feeder bays at Koeberg Substation to accommodate future requirements for new lines.</p> <p>It is for the aforementioned reasons that a new 400/132kV substation (Weskusfleur Substation) will be required in the vicinity of the Koeberg Power Station to:</p> <ul style="list-style-type: none"> <li>• Improve the existing 400kV reliability</li> <li>• Cater for load growth on the 132kV network for the 20 year horizon</li> <li>• Prevent overloading of existing 400kV busbar and,</li> <li>• Replace 30 year old technology/equipment.</li> </ul>		

Issue/Comment	Raised By	Response
<p>The required area size for the substation location will be approximately 760 x 550m depending on the final location and the technology option as per the outcomes of the EIA process. The Substation will need to account for the current and future needs/plans. The length of the diversion of the power lines will also determine the final substations location.</p> <p>The Disaster Risk Management Centre (DRMC) is the custodian for the execution of the Koeberg Nuclear Emergency Plan (KNEP) and is tasked with the responsibility of ensuring that the public safety arrangements are in place in the case of a nuclear emergency and that individual citizens are not endangered with particular emphasis on the population residing in the UPZ of the 0-16km area from the KNPS.</p> <p>The DRMC cannot support this application at this stage. The DRMC may, in future, be able to support this application once the updated Traffic Evacuation Model (TEM) is approved by the National Nuclear Regulator (NNR). The revised TEM process has thus far included submission to the Koeberg Nuclear Emergency Plan Structures viz: Emergency Planning Committee (EPC), Emergency Planning Steering and Oversight Committee (EPSOC) and the City of Cape Town Portfolio Committees that culminated in full Council endorsement on 27<sup>th</sup> September 2012. Following this, the TEM has been submitted twice (during October 2012 and April 2013) to the NNR for approval, upon which a final reply is awaited.</p> <p>Any enquiries regarding the DRMCs decision to object towards the application for an EIA for the proposed Weskusfleur Substation in</p>		

Issue/Comment	Raised By	Response
the vicinity of the Koeberg Power Station could be directed to this office, should you require any additional information.		
<b>3. Cape Nature</b>		
What are the commenting timeframes for the BID? Thank you	Rhett Smart Scientist: Land Use Advisor  Scientific Services Correspondence: emailed on 25 April 2013	Comment noted.
Please see attached the latest version of CapeNature standard response letter indicating our requirements for commenting on land use applications (EIA, mining, agriculture, LUPO). In particular, take note of our requirements in terms of provision of reports for review.	Rhett Smart Scientist: Land Use Advisor   Scientific Services Correspondence: emailed on 21 June 2013	The CapeNature standard response letter have been received have been taken in consideration for the DSR and also the FSR.
Thank you for the notification. Please can you forward us a hard copy of the report? I have also attached our standard commenting letter indicating or requirements for commenting on land use applications.	Rhett Smart Scientist: Land Use Advisor  Scientific Services Correspondence: emailed on 25 July 2013	Lionel Skeffers response on 25/07/2013:  A hard copy and a CD was hand delivered to your office in Jonkershoek on the 24 July 2013. We are still awaiting the acknowledgement receipt letters from our delivery person in Cape Town. When we get confirmation from him, we will get back to you. We have received your commenting letter.
<b>Potential Project Alternatives</b> CapeNature takes note that there are five location alternatives for the proposed substation presented in the Draft Scoping Report. There are also two technology alternatives presented, thereby	Rhett Smart Scientist: Land Use Advisor  Scientific Services	Lionel Skeffers response on 03/09/2013:  Good day Mr. Rhett Smart

Issue/Comment	Raised By	Response
<p>resulting in 10 potential alternatives of a combination of technology and location. Three of the proposed location alternatives are located on the property of Koeberg Power Station, Farm Duynefontein 34, and the other two are located on adjacent properties.</p> <p>Farm Duynefontein 34 forms part of the Koeberg Private Nature Reserve, declared under the Western Cape Nature and Environmental Conservation Ordinance, 1974 (Ordinance 19 of 1974), and is therefore listed as a Conservation Area according to the Biodiversity Network for the City of Cape Town (BioNet). It is likely that sections of the three alternatives fall outside of the area declared as nature reserve within the power station precinct.</p> <p>Location Alternative 4 is located on Portion 1 of the Farm Brakkefontein 32, and the site is classified as Critical Biodiversity Area according to the BioNet, and the vegetation type is Atlantis Sand Fynbos classified as Critically Endangered. Location Alternative 5 is located on the Farm Groot Oliphantskop 81 and is not listed as a CBA or Ecological Support Area on the BioNet. The vegetation type that would have occurred on site is Cape Flats Sand Fynbos (Critically Endangered), but the site has evidently been transformed according to the Scoping Level Fauna and Flora Specialist Study.</p>	<p>Correspondence: emailed on 2 September 2013</p>	<p>We hereby confirm receipt of your e-mail.</p> <p><u>Response from Marinus Boon</u>: Comment noted and will be taken in consideration.</p>



Issue/Comment	Raised By	Response
<p>The two technology alternatives are Gas Insulated Substation (GIS) or Air Insulated Substation (AIS). It is evident that the AIS requires a much larger footprint (760m × 550m = 41.8 ha) than the GIS (400m × 180m = 7.2 ha) – almost six times the size. The GIS would therefore be the preferred technology from a biodiversity perspective in all instances.</p> <p>It is evident that further technical feasibility studies were only undertaken once the initial ten potential location × technology alternatives were identified. Following the technical feasibility studies only two of the ten were identified as being technically feasible, namely the GIS for Alternative Location 1 and the AIS for Alternative Location 4. The other alternatives should therefore not be included for further consideration if they cannot be implemented, unless the feasibility study was too conservative.</p> <p>In terms of the two identified feasible alternatives, the GIS for Alternative 1 would be the preliminary preferred alternative from the biodiversity perspective based on the desktop information and Scoping level studies, due to the smaller footprint and the more disturbed location adjacent to the existing power station.</p> <p>More detailed specialist studies are required to verify the preferred alternative and its acceptability. EIA Phase specialist studies should include detailed fieldwork undertaken during Spring for the fauna and flora specialist study to identify any potential Red listed annuals or geophytes, as well as other faunal and floral species.</p>		

Issue/Comment	Raised By	Response
<p>In terms of the potential impacts on avifauna, it is recommended that the experiences from the past 30 years of the existing power lines is used to inform potential impact, taking into account existing impacts.</p> <p>CapeNature also supports the proposal to undertake a freshwater specialist study for the EIA Phase of the project, as there are small wetlands scattered throughout the Koeberg property according to the BioNet and previous studies undertaken on site.</p> <p><b>Formal Conservation Status</b></p> <p>An important aspect to consider for this application is the existing Conditions of Approval for previous Environmental Authorisations that are binding on the Farm Duynefontein 34 for any further development. In the Appeal Decision for the Administrative Centre and Training Campus for the Koeberg Nuclear Power Station dated 23/11/2010 (ref. no. 12/12/20/997), the following condition is of relevance:</p> <p>“1.46 Further before any development on Cape Farm 34 is submitted for environmental authorisation, the applicant must submit its management plan for its private nature reserve to CapeNature for approval and must enter into a stewardship agreement with CapeNature.”</p>		

Issue/Comment	Raised By	Response
<p>Therefore, despite the fact that the condition above was for a development of Eskom Generation, this condition is still relevant to any development located on the property (Farm 34 Duynfontein), even if the applicant for the development is not Eskom Generation. Therefore this proposed development should not be approved until the above condition is complied with.</p> <p>In terms of compliance with this condition, the management plan for the private nature reserve has been submitted to CapeNature and we have provided comment. The plan needs to be updated to reflect the requirements of the Protected Areas Act.</p> <p>In terms of the stewardship agreement, preliminary meetings have been held prior to the initiation of this process. It is recommended that follow-up meetings are held prior to the release of the Draft Environmental Impact Report and that a draft proposal for stewardship must be compiled and included with the submission, as agreed to by both Eskom and CapeNature.</p> <p>The consideration of the stewardship agreement should take into account any long term plans for the site, the current status as a protected area and other outstanding conservation obligations of Eskom Generation (e.g. offset for Ankerlig Power Station).</p> <p>It is recommended that the consideration of stewardship and offsets be included in the terms of reference of the fauna and flora and</p>		

Issue/Comment	Raised By	Response
<p>freshwater specialists for the EIA Phase. This will be more efficient in the long term regarding the stewardship agreement. The specialist studies should therefore consider both the impacts of the current development and stewardship taking into consideration the long terms plans.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>		
<b>4. Western Cape Provincial Government</b>		
<p>We acknowledge receipt of your correspondence dated 05 July 2013, the content of which has been noted.</p> <p>Your correspondence has been referred to the office of the Head of Department for necessary attention.</p> <p>Please quote our tracking number (2013/1123) as reference in all correspondence and enquiries.</p> <p>Please be advised that Dr Fast has referred your email to our Chief Directors: Mr Graham Paulse and Mr Colin Deiner who are nominated to assist you in any future queries.</p> <p>Your request this morning refers, please find appended below the information you requested.</p> <p>Postal Address:- Private Bag X9076 Cape Town</p>	<p>Amanda Willett Assistant Director Office of the Head of Department Local Government</p>	<p>Comments noted.</p>

Issue/Comment	Raised By	Response
<p>8000</p> <p>Chief Director: Disaster Management and Fire Brigade Services Mr Colin Deiner Tel 021-9370808 Cell 0825506770 <a href="mailto:colin.deiner@westerncape.gov.za">colin.deiner@westerncape.gov.za</a></p> <p>Chief Director: Municipal Performance Monitoring and Support Mr Graham Paulse Tel 021-4836126 Cell 0723488135 <a href="mailto:graham.paulse@westerncape.gov.za">graham.paulse@westerncape.gov.za</a></p>		
<p><u>TD question:</u> Which are the preferred option(s)?</p> <p>.</p> <p><u>TD question:</u> Are cumulative impacts considered? If any, what are they?</p> <p><u>TD question:</u> Conflict on development, in terms of Stewardship agreement(s)?</p>	<p>FOCUS GROUP MEETING HELD ON</p> <p>Wednesday, 14 August 2013, 08:30</p> <p>Department of Environmental Affairs and Development Planning (DEA&amp;DP) 7th Floor Boardroom, Utilitas Building, 01 Dorp Street, CapeTown</p>	<p><u>Response by MB:</u> The preferred alternatives will only be finalised in the Final Environmental Scoping Report. In terms of the current technical analysis for all the alternatives, alternative 1 GIS and 4 AIS is the only viable options as indicated in the draft scoping report</p> <p><u>Response by MB:</u> Cumulative impacts will be addressed in the EIA phase which will include a list of other developments in the area.</p> <p><u>Response by DJ:</u> DJ provided background in terms of the Stewardship agreement and the status thereof. From the City of Cape Town Focus Group Minutes: Eskom Holdings SOC Ltd is finalizing a document that includes all current and future proposed</p>

Issue/Comment	Raised By	Response
<p><u>TD question:</u>What is the footprint into Nature reserve?</p> <p><u>TD comment and question:</u> Alternative 4 does have indigenous plants underneath Port Jacksons. How will Port Jacksons be cleared?</p> <p>In closing, DEA&amp;DP suggested to Lidwala that in future one focus group meeting should be arranged for the attendance of all the commenting authorities instead of the individual focus group meetings with the commenting authorities. The suggestion was noted and will be effected in the EIA phase consultative process.</p>		<p>developments on its land and would from there conclude a stewardship agreement with Cape Nature.</p> <p><u>Response by DJ &amp; MB:</u> DJ explained and indicated the proclaimed nature reserve areas, none of the alternatives fall within the proclaimed nature reserve area. MB also indicated that the final designs will indicate proximity or intrusion into sensitive areas</p> <p><u>Response by MB:</u> The clearance of vegetation and aliens will be addressed in the EMP in the EIA phase.</p>
<p>The following refer:</p> <p>This branches letter 13/3/5/6/2-31/08 (taak 21235) dated 15 May 2013 to you.</p> <p>Your email notification of DESR availability and Invitations to the Public Meetings, of 24 July 2013.</p> <p>This branch is the Road Authority of the following roads that are in the immediate vicinity of your various Alternatives:</p>	<p>Grace Swanepoel /ML Watters Executive Manager: Road and Transport Management Correspondence: emailed on 16 August 2013</p>	<p>Lionel Skeffers response on: 22/08/2013 Good day Grace Swanepoel I trust you are well- Herewith please be advised that your e-mail is noted.</p>

Issue/Comment	Raised By	Response
<p>Trunk Road 77 Section 1 (R27) and main road 199 (M19) are in the vicinity of Alternatives 1.</p> <p>Main road 199 and main road 215 (R304) are in the vicinity of Alternatives 5.</p> <p>Submitting a Transport Impact Assessment (TIA) for the construction phase of the substation is a requirement from this branch, as that could impact on the current road and traffic conditions.</p>		<p>Comment noted. A traffic study is included in the plan of study for the EIA.</p>
<p>The following comments are related to the draft scoping report (SR) and Plan of Study (POS) for EIA.</p> <p>1.1 Alternatives</p> <p>This Directorate notes that the preferred technology alternative is a Gas Insulation System (GIS) for alternative 1, however GIS is not easily expandable therefore the influence regarding future developments must be clarified.</p> <p>1.1.2 This Directorate notes that there are several tower design options available for use with the transmission line development, however the description of the design of the tower is inadequate. An adequate description of the tower design (eg height) is required.</p> <p>1.1.3 It is noted that for alternative 1, the Air Insulated System (AIS) yard extends over the proposed Nuclear 1 site. This must be clarified.</p> <p>1.1.4 It is noted that Alternative 2 will cause high marine pollution and heavy corrosion. This must be further investigated in the EIAR and EMP of the EIA.</p>	<p>DEA&amp;DP- Directorate: Land Management Region 2 Enquiries: Mr. A. Osborne Correspondence faxed on 02 September 2013</p>	<p><u>Eskom</u>: Spare bays will be catered for as part of the design. This will be applicable for future 400kV and 132kV expansion.</p> <p><u>Eskom</u>: The height of the towers will be in the region of 50m, but depend on the terrain and clearances required.</p> <p><u>Response from Marinus Boon</u>: A description of the tower design have been included in the FSR chapter 4</p> <p><u>Response from Marinus Boon</u>: A map showing the alternatives and their relation to Nuclear 1 has been included in the FSR.</p>

Issue/Comment	Raised By	Response
<p>1.1.5 The Directorate notes that Alternative 4 includes the clearance of alien vegetation. However indigenous vegetation occurs under the alien vegetation. The method for clearance of alien vegetation must be addressed in the EIAR and EMP of the EIA.</p> <p>1.1.6 This Directorate notes that a small tributary of the Sout River runs through the western corner of the proposed alternative 5, it is therefore highlighted that specific mitigation measures in relation to potential impacts on the watercourse must be included in the EIAR and EMP of the EIA.</p> <p>1.1.7 It is noted that Alternatives 1,2,3 and 4 all lie within a Critical Biodiversity Area (CBA), it is therefore highlighted that specific mitigation measures in relation to potential impacts on the CBA must be included in the EIAR and EMP of the EIA.</p> <p>1.2 Specialist Reports</p> <p>1.2.1 It is noted that contamination of ground water may occur due to hydrocarbon spillage and seepage into the groundwater reserves, affecting groundwater quality, this must be interrogated in the EIAR and EMP of the EIA.</p>		<p><u>Response from Marinus Boon:</u> This has been clarified and input from Nuclear 1 have been obtained and included in the FSR. Please also refer to <b>8. Nuclear 1</b> below.</p> <p><u>Response from Marinus Boon:</u> Alternative 2 is not a preferred or technical viable alternative for investigation in the EIA phase. The preferred alternatives that will be taken into the EIA have been indicated in the FSR. The high marine pollution referred to here is only in terms of pollution to the substation infrastructure – corrosion to the substation components.</p> <p><u>Response from Marinus Boon:</u> Comment noted. The method of clearance will be addressed in the EIR and EMP.</p> <p><u>Response from Marinus Boon:</u> Comment noted. Alternative 5 is not a preferred or technical viable alternative for investigation in the EIA phase. The preferred alternatives that will be taken into the EIA have been indicated in the FSR.</p> <p><u>Response from Marinus Boon:</u> Comments 1.1.7 – 1.2.2 noted and will be taken into consideration in the EIR and EMP.</p>



Issue/Comment	Raised By	Response
<p>1.2.2 It is noted that the alternatives and in particular the AIS on intact vegetation areas, are least favourable from an avifaunal perspective. Therefore comments from Cape Nature and Bird Life South Africa must be included in the final EIAR.</p> <p>1.3 Plan of study for EIA</p> <p>1.3.1 The power line arrangement for each alternative must be clarified so that the potential impacts of the powerline on avifauna and flora can be properly assessed.</p> <p>1.3.2 No wetlands appear to be within the affected areas, however the site visit was carried out during the dry season and the lack of such features within the affected areas must be confirmed with a site visit during the wet season.</p> <p>1.4 General</p> <p>1.4.1 On page 5-12 of the draft SR, reference is made of this Department's Guidelines (Need and Desirability; Public Participation), dated 2010. Please note that the relevant Departmental Guidelines are dated March 2013. These guidelines must be utilised since the 2010 versions are outdated.</p> <p>1.4.2 On completion of proposed development all areas should be cleared of any contaminated soil and oil spillage should be prevented.</p>		<p><u>Response from Marinus Boon:</u> Comment noted. The final design/layout will be taken into consideration in te EIA phase.</p> <p><u>Response from Marinus Boon:</u> Comment noted. A wetland study will be undertaken for the EIA phase during the wet season.</p> <p><u>Response from Marinus Boon:</u> Comments 1.4.1-1.4.3 noted.</p>

Issue/Comment	Raised By	Response
<p>1.4.3 Appendix A shows that the description of the routes of the power lines, investigated in the draft SR and POS for EIA are omitted in the legend of the updated locality map. As such you are required to re-amend the amended locality map accordingly.</p>		
<p>Please note that Department of Local Government has referred the matter to Department of Human (Planning or Property Section) in order to determine whether this proposed development impacts on any future housing projects.</p>	<p>05 September 2013 by NwabisaGeca Senior Administration Clerk Office of the Head of Department Local Government Western Cape</p>	<p>Comment noted.</p>
<b>5. Land Owners</b>		
<p>Further to receipt of your email dated 11 June 2013, I hereby lodge my objection to the 'alternative 4' location of the proposed substation as follows:</p> <p>If it is implemented, the proposed location 'alternative 4' will rule out any further use of the two existing domestic dwellings on my property, as they fall directly in the area covered by the proposed HV yard, and the overhead lines emanating from the yard, will traverse most of the remaining property, rendering it no longer fit for residential occupation.</p> <p>As you may appreciate, this scenario will not only negate any further use of the property for residential purpose immediately, forcing both families currently living on the property to find alternative housing, but it will also influence future plans for the use</p>	<p>J.W. Bantjies Correspondence: emailed on 14 June 2013</p>	<p>Comment noted and will be taken into consideration.</p>

Issue/Comment	Raised By	Response
<p>of the land, being sand mining and final development into industrial plots.</p> <p>In other words, a servitude scenario is not an option, and the property will have to be purchased outright, in its entirety, and compensation based on the replacement value of the land, dwellings, as well as potential future income.</p> <p>Trusting that this clarifies my position on this matter. I may be contacted in future on the contact details provided.</p>		
<p>I was very surprised to here that Eskom plans to build the Weskusfleur Substation as the 4<sup>th</sup> Alternative where our house stands and run 400 kV lines over the remainder of the property. I was under the impression that additional lines would run South West of our property well clear of the dwellings on land Eskom already owns.</p> <p>My parents bought the property ERF:1/1063 when I was in boarding school and it has always been home. I live in the second dwelling South West of the main house and my wife and I have been living here since June 2005. I would like my daughter to have the same stability and upbringing I had here and for her to inherit the property from me one day as my brother and I will from my parents.</p> <p>When we found out my wife was pregnant last year we commissioned an architect to help us transform our house into the perfect family home. We completed our phase one renovations in December 2012 and to date we have spent over R520 000 improving the home. We also have further plans to expand the</p>	<p>Curtis Bantjies Correspondence: emailed on 17 June 2013</p>	<p>Comment noted and will be taken into consideration.</p>

Issue/Comment	Raised By	Response
<p>house to accommodate a second child and swimming pool. Approved building plans and supporting invoices can be supplied on demand.</p> <p>Understanding that due to the proximity of the land in relation to Koeberg Nuclear Power Station my family and I have plans to mine sand on the property and then later stabilize it to build industrial units to rent out. This will provide a stable income for us and our children for many years to come.</p> <p>If a decision is made to utilise Alternative Site 4 we would have to move and be compensated.</p>		
<p>Heeltemalgekant teen ontwikkeling op eie en buurplaas se eiendom/ grond. Eskom besit reeds meer as voldoende van huleiegrond, waar hulle kan ontwikkel en mors na hartelus (oliphantskop en Koeberg).</p> <p>English translation: Completely against the development on my property and my neighbour's property. Eskom already owns more than enough of their own property where they can develop and litter (oliphantskop &amp; Koeberg).</p>	<p>NicoStoffberg</p> <p>Correspondence: emailed on 9 July 2013</p>	<p>Comment noted and will be taken into consideration.</p>
<p><u>Comment:</u> The Land Owner representatives were interested in the possibilities of the proposed Weskusfleur Substation with regards to their proposed Solar Park at alternative 4</p> <p><u>MB question:</u> Where are all the access routes to farm Brakkefontein?</p>	<p>LAND OWNER MEETING (ALT 4) HELD ON:</p> <p>Thursday, 15August 2013, 09:30</p> <p>Koeberg Power Station – Conservation Offices</p>	<p><u>Response by MB:</u> This depends on the final preferred alternative and final substation design and alignment of the transmission lines.</p>

Issue/Comment	Raised By	Response
<p><u>Response by PR:</u> Indicated on proposed Weskusfleur locality map where all access route to farm Brakkefontein is and to the proposed alternative 4.</p>		
<p>Please note your plan does not reflect all dwellings and some are indicated incorrectly.</p>	<p>Ralene de Necker Erf 1063 portion 2 Correspondence received: 29/07/2013</p>	<p>Marinus Boon response on: 30/07/2013 Hi Ralene, Your comment is noted. The proximity of dwellings to the preferred alternatives will be reassessed in the EIA phase when the final design and layout is available.</p>
<p>Further to our registration as an Interested and Affected party, we would like to make the following comments as owners of the farm Vaatjie (KleineZouteRivier 84, remaining extent- Cape Town.):</p> <p>1. Eskom's Koeberg lines are already crossing our farm, endangering our livestock breeding and curtailing our planting activities. Research has proven that proximity to electric power lines and substations prove a real radiation threat to humans and livestock, leading to cancer. We take pride in our free grazing cattle stock and as such realise premium prices for our organic beef, and at this stage the current power line area are used for planting purposes only after we did experience problems ( cancerous growths, abortions) when our cattle grazed in the area for prolonged periods.</p> <p>2. Currently Eskom's poor line access control poses a security risk and threat to the owners, employees and livestock. Eskom's access gates remains unlocked and in a bad state of repair, even after several requests and contrary to our Servitude agreement with</p>	<p>E-mail received on 30/08/2013 NicoStoffberg. StoffbergBeleggings Trust.</p>	<p>Lionel Skeffers response on: 03/09/2013 Good day Mr.NicoStoffberg We hereby confirm receipt of your e-mail and your comments are noted</p>

Issue/Comment	Raised By	Response
<p>Eskom, leading to unwanted vehicle access, stock theft and an invasion of our privacy.</p> <p>3. Sand mining rights have been registered for the area indicated as a possible power line servitude on our farm.</p> <p>4. The proximity of a sub station and additional power lines poses a threat to the value of our property and future development. We are currently in advanced negotiations with a major developer regarding an eco friendly development on our farm.</p> <p>5. Eskom owns the adjoining farm Oliphantskop, as well as the whole Koeberg area, consisting of 1000's of hectares where they can develop and build substations. It makes absolutely no sense to purchase more property for such purposes, and upset the whole community in the process.</p> <p>6. We have an eco 4x4 route running through the affected area. The affected area is also home to caracals (often seen in the area), steenbokkies, duikers, a cape meerkat family, breeding blue cranes and a secretary bird nest. To mention a few. Fossilised sponges dated to the pre Cambrian period have been found in the area by paleontologists, and the area is abound with stone age artifacts dated as old as 350,000 years by Dr. Tim Hart of the U.C.T. archaeology department.</p> <p>Leading from the above, our family and other affected parties with an interest in our farm, obviously strongly oppose Eskom's development on our farm and adjoining properties.</p>		

6. Melkbosstrand Ratepayers Association (MRA)		
Herewith notification of registration. Please confirm our registration.	<p>John Taylor  Chairperson Melkbosstrand  Neighbourhood Watch  Chairperson, Melkbosstrand  Ratepayers Association  Correspondence received on:  21/08/2013</p>	<p>Lionel Skeffers response on: 22/08/2013  Good day Mr. John Taylor  I trust you are well-  Herewith be advised that you are now registered on the Proposed  Weskusfleur Substation project database as an  Interested and Affected Party.</p>
<p>The main concern of MRA at this stage is the visual impact of the proposed sites (4 and 5) outside of the Koeberg plant area. Preference is given to sites 1 to 3 to minimise additional footprint of Eskom activities, minimise visual impacts associated with sites outside of this area and make best use of the brownfields status of the Koeberg plant area.</p> <p>Exposure long-term of animals in the Koeberg reserve and employees of Eskom to the additional overhead lines from the new proposed Substation should sites 1 to 3 be chosen.</p> <p>Additional safety considerations associated with the new substation (the Occupational Health and Safety Act should also be included for consideration in the legal section of the Scoping report).</p> <p>Impacts associated with the decommissioning and removal of the old substation that the new Wesfleur Substation is supposed to replace (hazardous waste disposal, recycling of materials where possible, rehabilitation of the old site, etc).</p>	<p>The Melkbosstrand Ratepayers  Association (MRA)  Correspondence: emailed on 2  September 2013</p>	<p>Lionel Skeffers response on: 03/09/2013    Good day Amanda Fritz-Whyte  Hereby we confirm receipt of your e-mail and that your comments are noted.</p> <p><u>Response from Marinus Boon:</u> Comments noted and will be taken into consideration. A geohydrological study will be undertaken during the EIA phase as indicated in the POS.</p>

<p>What is the effect of the new substation on the internal processes, licence considerations and outputs of the Koeberg power plant?</p> <p>The EAP should consider whether there should be a need for a localised geohydrological study associated with site dewatering during pillar establishment for the new substation. Disposal of water extracted to enable site establishment should also be considered.</p> <p>Overhead powerlines interfere with radio and cellphone functionality. This additional social impact should be considered especially for sites 4 and 5.</p>		
<b>7. Heritage</b>		
<p>Heritage Western Cape requires a Notification of Intent to Develop (NID) to be submitted regarding the EIA for Proposed Weskusfleur Substation, Western Cape, as required by Section 38 of the National HeritageResource Act (Act 25 of 1999). If this form has not already been submitted, please complete and submit the attached NID form and checklist, and send through one hardcopy and one digital copy (on a CD) along with any associated documentation to the HWC offices.</p>	<p>Guy Thomas Heritage Officer (Archaeology) Heritage Western Cape Department of Cultural Affairs and Sport Correspondence: 02 August 2013</p>	<p>Marinus Boon response on 08/08/2013: Hi Guy/Genna, Thanks for the email. We are aware of the NID to be submitted. We are currently in the scoping phase and currently in the public review period for the draft scoping report for the project. The heritage sub consultant on the project already completed the draft NID. We have 5 different locality alternatives for the project and is still in the process to identify the preferred locality through the EIA process- is there a specific time that we have to submit the NID. We have submitted a hard copy and CD of the Draft Scoping Report to your office : Ntombi Nkoane at HWC received the Copy. Please advise.</p>
<p>Hi Marinus</p>	<p>Guy Thomas</p>	<p>Marinus Boon response on 03/09/2013:</p>



<p>The submission of the NID following your finalisation of which alternative will be followed in your project is fine. You should be aware however that HWC will not comment on the Draft Scoping Report until the NID has been submitted.</p> <p>No development should take place until HWC has commented, as we are both the relevant Heritage Authority in terms of the National Heritage Resources Act (Act 25 of 1999) as well as a registered commenting authority for NEMA. The NID should form part of your public commenting phase when the final alternative is decided on.</p>	<p>Heritage Officer (Archaeology) Heritage Western Cape Department of Cultural Affairs and Sport Correspondence: 12/08/2013</p>	<p>Hi Guy, Thanks for the information. We will take this in consideration.</p>
<p>Heritage Western Cape requires a Notification of Intent to Develop (NID) to be submitted for the proposed Weskusfleur Substation, Western Cape Province (DEA: 14/12/16/3/3/2/508), as required by Section 38 of the National Heritage Resource Act (Act 25 of 1999). If this form has not already been submitted, please complete and submit the attached NID form and checklist, and send through one hardcopy and one digital copy (on a CD) along with any associated documentation to the HWC offices.</p>	<p>Troy Smuts Heritage Officer (Archaeology) Heritage Western Cape Department of Cultural Affairs and Sport Correspondence received on: 29/08/2013</p>	<p>Marinus Boon response on: 29/08/2013</p> <p>Hi Troy, With reference to your attached email please see the correspondence below. (Refers to e-mail received from Guy Thomas on 12/08/2013)</p>
<p><b>8. Nuclear 1</b></p>		
<p>The current location of the Alternative 1 AIS (Air Insulated Substation) GIS (Gas Insulated Substation) 400 kV Yards encroaches on the land currently earmarked for development for Nuclear 1 on the Duynefontein site. This area has been committed as such in Nuclear-1 in EIA in 2008.</p> <p>Land that is available for construction needs to be maximised for the New Build project as a Nuclear-1 vendor has not yet been identified. As such the location of the proposed plant is subject to</p>	<p>Tasneem Vawda Eskom Correspondence: emailed on 2 September 2013</p>	<p>Lionel Skeffers response on: 03/09/2013</p> <p>Good day Tasneem Vawda Your comments are noted and you have been registered on the proposed Weskusfleur project database.</p> <p><u>Reponse Eskom</u>: This is currently the only viable GIS option and it is noted that the location for alternative 1 encroaches on the land earmarked for development. Obviously this will be taken into account during the design phases.</p>

<p>change, and the total area currently allocated in the Nuclear-1 EIA would need to be available.</p> <p>As part of the Nuclear-1 EIA process, Eskom as indicated a site layout that would be required for an assumed vendor. This layout is concentrated to the South of the available EIA corridor in order to avoid impact on the mobile dune fields further north. This means that any new development north of the existing Koeberg Power station will be constrained with regard to space.</p> <p>The attached drawing (Drawing No: 0.96/20085) indicates the Eskom EIA corridor for Nuclear-1 and the impact of Weskusfleur Alternative 1 on the Nuclear-1 EIA. The AIS subtraction encroaches significantly on the Nuclear-1 terraces.</p> <p>Land cannot be allocated to two projects at the same time.</p>		<p><u>Response from Marinus Boon:</u> Comments noted and will be taken into consideration. The final designs/layouts will be determined in the EIA phase. The AIS at alternative 1 is not a preferred/technical viable option to be taken into the EIA phase.</p>
---	--	---