

**PROPOSED ISUNDU 765/400 kV SUB-STATION AND TURN-IN TRANSMISSION LINES
(DEA EIA REF: 14/12/16/3/3/2/745)
Comments and Responses Report 4
31 January 2017**

Comments were received from the following stakeholders during the public review period of the DEIAR (31 October – 15 December 2016¹)

Name	Organisation
Diane van Rensburg	Ethekwini Municipality
Hetta van der Walt	Sappi Forests
Lorraine Hebblethwaite	Sub-station site property owner
Dave Rigby	Private developer
Pieter Venter	Transnet Pipelines
Judy Marx	SA National Roads Agency
Dave Bishop	Local IA&P
Karen Moodley	Department of Agriculture, Forestry & Fisheries
David Stock	National Chicks - Division of Astral Operations
Judy Bell	Winterkloof Conservancy
Doug Burden	Duzi uMngeni Conservation Trust
Tashveer Bothath	Ingonyama Trust Board
R Madflopha	Ingonyama Trust Board
Dave Bozas	Mayibuye Game Reserve
Aldine Armstrong	Eversheds (Representing RCL Foods)
Nandipha Sontangane	Department of Agriculture, Forestry & Fisheries
Sanjay Maharaj	RCL Foods
Warren Smith	J Leslie & Company Inc. (Representing Natal Zoological Gardens, Natal Lion Park and Brian Boswell)
Shannon Hoffman	African Bird of Prey Sanctuary
TC Ndlela	Mkhambathini Municipality
Nhlakanipho Nkwanyana	Ezemvelo KZN Wildlife
Marc Hattingh	uMngeni Municipality
Hennie Heyns	Aloe Wildlife Estate/Samaria Safaris
Reka B-Kalicharan	KZN DEDTEA

¹ All comments received, including those submitted after the official review period, have been included.

No	Ref	Date	Name and Organisation	Comment	Response
1	00048	31 Oct 2016	Diane van Rensburg Ethekwini Municipality	<p>Do you need comments from any of the eThekwini Municipality Departments?</p> <p>Noted, thank you.</p>	<p>Thank you for your response. The sub-station and transmission line related to this application do not fall within the eThekwini Municipality. You are on the database due to the fact that previously eThekwini was involved in the VSHA EIA and your municipal boundary is still quite close to the proposed infrastructure. Thus, although eThekwini is welcome to comment, the EAP believes formal comment is not required from eThekwini in terms of the EIA process.</p>
2	00049 a and b	01 Nov 2016	Ms. Lorraine Hebblethwaite	<p>It is of some concern to me that, after many years, I've not received any communication from your client, Eskom, with regard to my property. Please can you advise me, for the purposes of clarity:</p> <p>a) It is still proposed that the sub-station should be built on my property; and</p> <p>b) Whether, in your experience, it is customary for the client to entirely ignore the registered and lawful owner of the property. As you know, this process has been ongoing for several years, and to date I have had no communication from Eskom. It's a bit surprising to me that, while I believe ACER have kept me informed of the EIA, your client seems to be unaware of my existence or my legal rights as owner. Considering my experiences with Umgeni Water, who commenced works for a pipeline on my property without any communication at all, I'm rather concerned that Eskom might act in a similar vein.</p> <p>It might be helpful if you would be kind enough to let me know the details of the key Eskom personnel who are involved in this project, in order that I might address them directly? I think it might be prudent for me to contact Eskom directly, as they have not manifested any intention of communicating with me in this regard.</p>	<p>Yes, Eskom is still investigating the proposed sub-station on your property. We are still in the environmental authorisation phase though. Thus, until environmental authorisation is granted, Eskom cannot proceed any further with more detailed planning of the sub-station.</p> <p>There are a number of questions here. Firstly, you are not being ignored and it is quite normal that you are not having much personal interaction with Eskom negotiators at this stage. These large projects take many years of investigation to obtain all the planning and approvals. Without such approvals, Eskom cannot commence to negotiate with you as the landowner, as they can't negotiate or sign agreements when approvals are still outstanding. If for example, environmental authorisation were not granted then any negotiations or agreements would have been in vain. Environmental authorisation is an important part of the project investigation process and Eskom appointed ACER to undertake the EIA. Thus, we initially contacted you on behalf of Eskom to obtain</p>

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					<p>permission to proceed with the investigation and then since 2014 the EIA has been underway. That is why you hear from ACER rather than Eskom at the moment.</p> <p>However, please be assured that Eskom is most definitely aware of the fact that you are the landowner and of your legal rights as the landowner. Eskom is only likely to commence negotiations (with any landowners) once environmental authorisation has been obtained. Currently it is anticipated that the Final EIA will be submitted around the end of January 2017, thus, it is likely that any decision from the Department of Environmental Affairs may only occur around mid-2017. If the decision is appealed, as can often occur with large projects, this could take anywhere between six months to a year or longer to resolve. Thus, assuming the site is granted a positive authorisation, it is not possible to predict with any accuracy when Eskom will commence negotiations with you. To give you a comparison, authorisation for the VSHA transmission lines was granted in 2012 (the EIA ran from 2009-2011) and Eskom has still not commenced negotiations with some of the affected landowners as Eskom put transmission line negotiations on hold until the outcome of this Isundu EIA process is known.</p> <p>ACER cannot comment on your experiences with the Umgeni Water pipeline, who were needing a servitude across your farm. However, we can confidently assure you that Eskom will not commence construction of this project until all authorisations are in place and the relevant property has been purchased.</p>

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				<p>Thanks very much for your very prompt and helpful response; I greatly appreciate the fact that you took the time to outline the situation to me in detail.</p> <p>It's fair to say you have been helpful and informative from the beginning; the notion of our family farm succumbing to the march of progress is deeply distressing, but the reality is that the power grid has to be expanded somewhere.</p>	<p>I have copied Annah Motalane and Vuyo Dingiswayo from Eskom on this email. They are responsible for the EIA and land negotiations, respectively.</p>
3	00050	01 Nov	Dave Rigby Private Developer	<p>I have just spoken the owner of the property and she has not had any engagement from Eskom regarding this development on her property. How can this be so?</p> <p>Please can you provide us with the authority that the owner gave you to do the EIA on this property?</p> <p>I have cc'd the owner and the town planner.</p>	<p>In response to your email, please see the attached landowner consent. Lorraine has been well aware of the proposed project since 2014 and has been kept informed that we are undertaking an EIA for the sub-station on her property.</p> <p>Please see the email response to Lorraine to follow that I will cc you on for further clarification.</p>
4	00051	01 Nov 2016	Pieter Venter Transnet Pipelines	<p>Can you please forward me a sketch to show where the Transnet Pipelines position regarding this new development?</p> <p>Will the transmission lines be crossing the Transnet Pipelines?</p>	<p>Herewith, please find a map I have extracted from the Spatial Development Specialist Study. The proposed double circuit 400 kV transmission lines from the sub-station, which form part of this application, are proposed to follow a route down the eastern side of the existing 275 kV transmission line which is already within the previously authorised VSHA corridor.</p> <p>Thus, as per my map data I don't believe the transmission lines will cross Transnet's NMPP pipeline but the preferred alignment is likely to cross Transnet's TPL pipeline.</p> <p>I have also attached Google Earth files which may make it easier to view. Please contact me should you require any further information.</p>
5	00052	01 Nov 2016	Judy Marx SA National Roads Agency	<p>Could you kindly send us a CD to the address below. Could you please include a locality plan indicating our National Road so we can see if we are affected by this application.</p>	<p>Thank you for your response. We have compiled your request and have sent it via Speed Services today.</p>

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6	00053	01 Nov 2016	Dave Bishop Local I&AP	Called to request a locality map and more information. Thank you for that and please keep us updated as Steph's property falls within the area.	Please see attached the locality map for the Isundu Sub-station. Please also note that the final report is under 4. Draft Environmental Impact Assessment Report on ACER's website www.acerafrica.co.za . If you have any other questions please contact us. Noted, you are included on the database and will be kept informed.
7	00054	01 Nov 2016	Hetta van der Walt Business Manager Sappi Forests	Would it be possible for us to get the shape files of the line and sub-station as we need to overlay it on our property maps to understand the impact that it would have on our plantation and property.	Shapefiles were provided.
8	00055	02 Nov 2016	Karen Moodley Department of Agriculture, Forestry & Fisheries	This letter serves as a notice of receipt for the above mentioned document(s) received on 31 th of October 2016.	Noted.
9	00056	10 Nov 2016	David Stock National Chicks	The current building is too far to impact us directly now. But the lines may do in future.	Thank you for your response, you will remain on the current database.
10	00057	14 Nov 2016	Dave Rigby Private Developer	I am not going to make the public meeting but attached are my objections to the proposed development. I am not objecting for the sake of objecting – our development application started 10 years ago and only got approved last year. The municipality prescribed that we develop in terms of their strategic development plan which we did at great cost. If Eskom were to fund and facilitate a new EIA for a Light Industrial/Warehousing application and guarantee the approval, then we may look at withdrawing our objections. The proposed sub-station will completely change the aesthetics and “sense of place” of the entire area and we will have to restart our application from the beginning. This is why we have a major objection to Eskom putting the sub-station here.	Your proposed developments and that of Hennie Heyns have had numerous iterations and adjustments which were not only related to the municipal planning. Your property is adjacent to the N3 highway and any persons travelling to your property would not need to pass the sub-station site nor will it be a visual intrusion at that distance, if in fact it is visible at all.

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				<p>The other major reason for our objection is that Pietermaritzburg is going to require a proper airport and the ONLY site suitable for an airport is on Hennie Heyn's land and the 2nd runway traverses the piece of ground onto which you want to put the sub-station. There are no other sites within a 50 km radius of Pmb. Together with all the transmission lines coming in and out of the sub-station this development will completely obliterate any chance of Pietermaritzburg having a proper airport. (Attached herewith the Master Plan). This will create many thousands of jobs and enhance the economy of KZN.</p> <p>This sub-station may create jobs in the construction phase but once finished no permanent jobs are created. This is unacceptable. If this goes ahead, the 150-200 permanent jobs that would have been created on our development will be lost.</p> <p>The same goes for the Aloe Wildlife Estate development and the Game Reserve development.</p>	<p>The masterplan attached shows industrial development around the airport site. This is also in opposition to both your plans and Hennie Heyns' current plans for the Aloe Wildlife Estate. In the PPP documentation for Kingsthorpe (a housing estate development application prior to it being altered to Aloe Wildlife Estate) you state that the original feasibility study that identified this site was done in 1987. Ms E Donaldson in the same meeting also stated 'that the Mkhambathini Municipality were aware that the Msunduzi Municipality were looking for a site for a new airport. However, that is as far as it has gone for now'. This was back in 2011. The current Msunduzi Municipality 2016/2017 – 2020/1 IDP shows that funds were spent in the last few years upgrading the existing Pietermaritzburg airport and the further upgrade of the airport and its precinct is also listed as a Catalytic Project going forward.</p> <p>Thus, ACER believes it is fair to assume that the proposed new regional airport is no longer being considered by the authorities.</p> <p>The sub-station does not directly affect your property or development. Stakeholders will also not need to travel past the sub-station to reach your property. Thus, there is no reason why there should be any job losses at your development or the proposed Aloe Wildlife Estate.</p>

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				Please could you send us the report quantifying the details regarding the extra costs that were to be incurred at the site that was approved near Wartburg.	Section 4.3 of the EIAR provides the cost comparisons between the Sigma (Wartburg) site and Isundu, which are based on the cut and fill requirements and type of design used.
11	00058	14 Nov 2016	Dave Rigby Private Developer	<ol style="list-style-type: none"> 1. Development is contrary to the Strategic Development Plan of the Municipality, it is industrializing the northern side of the highway in a natural area where wildlife abounds. 2. Negative aesthetic impact on the area – property values will be severely impacted by the industrial nature of the development 3. Powerlines are unsightly and impact surrounding areas 4. We request the geotech report for the Wartburg site and the report on the cost impact not provided. 5. Development impacts on airport site located on the adjoining property –Kingthorpe & Bar Circle. 6. Development impacts negatively on developments that had been planned for the area prior to the proposed Eskom development. Kingthorpe Game Reserve, Mkhonto/Acaciadale. 7. The property where the development is proposed is under a land claim which has hindered all other development in this area – so the claim that the sub-station is there to provide power for the area is nonsensical – there is no development because of the land claim. 	<p>The proposed airport development addressed previously would also be contrary to the current Municipality's plans yet you continue to maintain that it is necessary for KZN.</p> <p>Visual impacts have been addressed in the EIAR and information is provided on the Sigma site.</p> <p>The feasibility of the airport site has been already discussed.</p> <p>The status of surrounding developments and impacts upon them has been taken into account in the EIAR. It is important to note that you also submitted an appeal against the Kingthorpe development in 2011 as it would prevent the airport development.</p> <p>This sub-station is to strengthen the overall KZN electrical grid for the benefit of all of KZN and to also link to the Eastern Cape. It is not aimed at meeting the needs of surrounding landowners, although as KZN residents they will also benefit.</p>
12	00059	15 Nov 2016	Dave Rigby Private Developer	<p>Rainbow Chickens have appointed us as agents to dispose of various properties.</p> <p>I would like to offer the property adjacent to Eskom's proposed sub-station to Eskom as an alternative site for the development as the site is already disturbed and would be less intrusive.</p>	ACER provided the details of the Eskom's Senior Acquisition Advisor, Mr Vuyolwethu Dingiswayo.

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				<p>Please could you provide me with the negotiators details so I can offer them this property.</p> <p>The property description is: Rainbow Ranch Portion 0 of 885 Vaalkop & Dadelfontein in 346.5260 ha. The asking price is R 30,000,000 plus VAT.</p> <p>Should you be interested please contact me.</p>	<p>However, RCL Foods claim that no formal mandate has been given to any agents for this property, although they confirmed they are considering the sale of the property.</p> <p>There are a range of technical criteria involved in selecting a sub-station site and it is not simply a case of identifying vacant land for sale. The current proposed site is also a disturbed farm and developing on the RCL property may be even more intrusive and could in fact bring the proposed sub-station and/or transmission lines closer to the developments and 'airport site' referred to earlier.</p> <p>As you will have seen by my response to Lorraine recently which I copied you on, Eskom has not yet purchased the Isundu property and will only start to negotiate this once environmental authorisation (and perhaps other permits such as the WUL, SPUMLA) are in place.</p>
13	00060	02 Dec 2016	Judy Bell Winterskloof Conservancy	<p>The Winterskloof Conservancy has worked with and benefitted from the amazing work that the team at the Raptor Centre has done and continues to undertake to ensure that these apex predators are able to survive despite the hazards they face from development. It is thus with sadness that I read about this proposal realigning the Eskom power line and sub-station location, which will directly affect them and the future of their operations in Ashburton.</p> <p>I noticed that the reason for the change was the cost of the proposed Wartburg sub-station due to the additional foundation work required. Has the system used by Eskom in the sand forest in northern KZN been considered for this? If not, please do so. It is known as a helical pier foundation and <u>Geo Screw Foundations</u> was the company working for Eskom on the foundations for the pylons, so it is known and understood technology. Warren Confyt can give you details – I have copied this note to him as well.</p>	<p>Thank you for your comment.</p> <p>ACER forwarded your email and discussed it with the Eskom engineers. The type of foundation system you refer to is a piling system that is used in poor soft soils to provide sufficient strength and stability to the foundations of a building or transmission line. Where standard foundations are unsuitable this piling system is used to avoid excessive excavations down to bedrock or firmer stable soils. Eskom has needed to use this approach in the northern KZN sand forests due to</p>

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				<p>If the route still needs to be realigned, please would you ensure that the Raptor Centre is relocated at the expense of the project to enable them to do their essential work with their already limited funding. Many of their “patients” are rescued and rehabilitated as a result of strikes with power lines, so this would be good corporate responsibility in terms of Eskom’s corporate governance. Without these predators, a vital part of our ecosystems will be missing and we as society will soon realise the impacts of that loss when it is too late to remedy.</p> <p>Please record this note formally in your documentation for submission to DEA.</p>	<p>the sandy nature of the soils. However, this piling approach is barely capable of holding the load of a 132 kV line tower. The foundation loads for 400 and 765 kV and associated sub-station equipment is orders of magnitude heavier than a 132 kV tower. However, the foundation challenges associated with the previously authorised Sigma site were not that the soils were too sandy, but that the cut and fill volumes to create a suitable terrace were excessive. This geotechnical constraint cannot be overcome with foundation piling technology, especially over a large site such as that required for the sub-station.</p> <p>Meetings and correspondence have been held with the Africa Bird of Prey Sanctuary involving the EAP, Eskom project planners and negotiators to better understand the proposed relocation and how this could be done without impacting upon the Sanctuary and its programmes. Eskom does pay for relocations though a negotiated process based on independent evaluators recommendations and cost estimates.</p> <p>This comment will indeed be incorporated into the Comments and Responses Report, and will form part of the correspondence sent to DEA with the final EIAR.</p>
14	00061	08 Dec 2016	Doug Burden Duzi uMngeni Conservation Trust	Further to the note from the Winterskloof Conservancy (submitted by Judy Bell)- I would like to add the Umgenyane Conservancy to your ‘comments / response’ process. There are three ‘raptor release’ sites within our conservancy - all raptors coming from the Raptor Centre situated near the proposed Eskom site – the three sites mentioned in this note are: Camdeboo (Roy Mottram); Braeside (Doug Burden); as well as Hilton College. Please could you acknowledge the inclusion of this info in your process.	Comment noted. The discussions and negotiations with the Sanctuary need to take into account all factors related to the Sanctuary’s programmes. The presence of these release sites is noted.

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15	00062	21 Nov 2016	Tashveer Bothath Ingonyama Trust Board	<p>Kindly could you confirm if the land on which the abovementioned project is to be located on falls under the ownership of the Ingonyama Trust Board? Further, would any of the overhead transmission lines traverse through land owned by the Ingonyama Trust Board (ITB).</p> <p>Should these falls within ITB owned land, has there been any consultations and the likes with the relevant community and/or Traditional Council – please supply proof of such in terms of meeting minutes, registers, comments, etc.</p> <p>Once this information is available to ourselves, the ITB will then be in a better position to provide comment on the document submitted to ourselves.</p>	<p>The proposed Isundu EIA application is covering the proposed sub-station and approximately 4 km of 2 x 400 kV double circuit lines.</p> <p>As far as we are aware, none of these properties are owned by the ITB, but by a private individual (for the sub-station) and the Mayibuye Community Trust (for one part of the transmission line). All have been involved in the PPP process.</p> <p>I have attached kml files showing the proposed sub-station location and layout, and the recommended route for the transmission line. Please advise if you have any further queries.</p>
16	00063	14 Dec 2016	R Madflopha Ingonyama Trust Board	<p>Your correspondence has been received by the Ingonyama Trust Board (ITB) in relation with your email dated 2nd December 2016 that refers. Kindly note that the proposed project sites are not under the ownership of the ITB. Should it ever be established that ITB land is being affected by the proposed project, formal agreements need to be entered into between the Ingonyama Trust Board and Eskom.</p> <p>It should however be noted that the buffer distances between the sub-station and transmission lines are to be adhered to and communities living in close proximity to the electrical infrastructure are to be safeguarded at all times. Should the transmission lines ever need to traverse via ITB land, adequate consultation is to be undertaken with the ITB to ensure that servitude agreements are put in place prior to any construction work being embarked on.</p>	Noted, thank you.
17	00064	25 Nov 2016	Dave Bozas Mayibuye Game Reserve	Telephonic conversation – EAP contacted Dave Bozas to enquire why no Mayibuye representatives had come to the public meeting and to request that they provide comment on the DEIAR findings.	<p>Follow up email sent.</p> <p>Thanks for the call on Friday. As discussed, I will be in the area on 8 December 2016 with the relevant Eskom officials (EIA, engineering, and negotiation) and so I suggest we meet and discuss the project, the proposed mitigations and any concerns you may still have about impacts upon Mayibuye.</p>

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				The 8 th is fine for me and on site to meet if that suits you.	<p>However, I believe it is important that you review the relevant sections of the draft EIA report prior to our meeting. These reports have all the information and maps on where the proposed sub-station is to be located, maps looking at known future lines and cumulative impacts, etc. There are sections that discuss in detail the findings of the various specialist studies (which are also available on the website) and also how the project may impact Mayibuye and what has been recommended to mitigate these impacts.</p> <p>You can find all the reports at the following link: http://www.acerafrica.co.za/index.php?option=com_docman&Itemid=9</p> <p>We have two other meetings scheduled on the 8 December 2016 earlier in the day and, thus, please can we arrange to meet you at approximately 2:45 pm. Please advise prior to the time where you suggest we meet. I will let you know on the day if we finish earlier or are running late.</p> <p>[Unfortunately, Dave had to cancel the meeting at the last minute due to urgent family matters]</p>
18	00065	15 Dec 2016	Dave Bozas Mayibuye Game Reserve		ACER email sent: I just wanted to follow up if Mayibuye has any further comments on the proposed Isundu sub-station project and the findings of the DEIAR. If so, please send them by 23 December 2016 so that we can start incorporating all comments into the final EIAR in January 2017.
19	00066	02 Nov 2016	Aldine Armstrong Eversheds (Representing RCL Foods)	Kindly send a link to an electronic version of the full draft EIA and WUL application including annexures.	As per the email sent out, the reports are available on ACER's website: www.acerafrica.co.za under 'Current Projects' under the link Eskom: Isundu 765/400 kV Sub-Station and Turn-In Transmission Lines.

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					I have copied the link address (http://www.acerfrica.co.za/index.php?option=com_docman&Itemid=9). This will take you to the relevant folders.
20	00067	02 Nov	Nandipha Sontangane DAFF	Please forward a copy to DAFF – 6 th Floor, 185 Old Mutual Building, Langalibalele Street, Pietermaritzburg	Please note that a hard copy of the report and a CD has been delivered to Mrs. Karen Moodley, DAFF, 185 Langalibalele St, Old Mutual Bldg, 6th Floor, Pietermaritzburg. DHL has confirmed that the report has been signed for. Thus, please contact Karen to establish who in your Department now has the report. Please contact ACER should you have any difficulties.
21	00068	7 Nov 2016	Sanjay Maharaj RCL Foods	Thanks for the minutes [of the RCL Foods Key Stakeholder meeting]. I have clarified the issue of other cases where birds were lost in the Midrand area from what I thought was blasting, but I have been informed that it was actually from a tremor. This occurred about 7 years ago and the records are not available, but from discussions with the Production Manager who was working in that area at the time, there were losses of about 15-20% per house. The intensity of the tremor was not recorded.	Noted, thank you.
22	00069	18 Nov 2016	Sanjay Maharaj RCL Foods	Telephonic discussion.	P Scherzer contacted Dr Sanjay Maharaj to enquire about why their property was now up for sale. Dr Sanjay said they are looking at moving their business north and currently have an EIA for a new laying farm. They have put their property up for sale, and so if they get the right price they will move their production up north, if not they will keep producing in KZN and truck the eggs up north. If the purchase went through quickly then they would just need to buy in eggs if they did not have a laying farm in the north yet.
23	00070	13 Dec 2016	Warren Smith J Leslie & Company Inc.	We refer to your letter dated the 31 st October 2016 as well as the draft Environmental Impact Assessment Report Executive Summary provided to us by our clients reflected above.	A detailed response was prepared and sent. See the end of this CCR.

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			[On behalf of Natal Zoological Gardens, Natal Lion Park and Brian Boswell]	<p>Our clients inform us that they have already provided comments as interested and affected parties and confirm that they join issue and support the objections and concerns already raised.</p> <p>Our instructions are to deal specifically with the existing and planned tourism activities surrounding the site but most importantly the Natal Zoological Gardens and Natal Lion Park; as well as Mr Boswell's private collection of exotic birds; which are raised and bred on the same property as the Natal Zoological Gardens registered in the name of Mr Brian Stanley Boswell.</p> <p>The draft Environmental Impact Assessment Report concedes the potential negative impact on surrounding enterprises, including existing and planned tourism centres. As is reflected in the draft EIA the area is zoned for agriculture and eco-tourism and a large sub-station in the area, along with the planned transmission lines, will certainly have a direct and indirect impact on our clients' enterprises.</p> <p>Besides the visual deprivation; the concession that the location of the sub-station will alter the development trajectory of the local area towards a more industrialised nature; rather than eco-tourism, will have an impact on our clients' enterprises. This impact will increase significantly once the five (5) planned transmission lines are added; particularly where those lines are likely to cut across or near our clients' properties, including the Natal Lion Park. The concession that the curtailment of future tourism potential of the Mayibuye Game Reserve would be "of medium significance"; without conceding the significance of that impact on our clients' eco-tourism initiatives is noted with concern. Although the sub-station may be largely out of site; the transmission lines certainly will not be.</p> <p>Our clients instruct us that the wild animals and birds, as well as the breeding parrots at the Natal Zoological Garden are not that much further from the proposed sub-station than the African Bird of Prey Sanctuary and Raptor Rescue (ABOPS) and that the potential disturbances reflected in the report in relation to ABOPS will apply equally to the Zoo.</p>	

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				<p>While we note the focus on the breeding program for the Bearded Vulture; our client has instructed us to point out that there are valuable, rare and exotic animals and birds located on the Zoo property.</p> <p>It would accordingly be relevant to include our clients in any tests which are proposed to be conducted in relation to ABOPS and RCL Chickens in relation to dust, noise, lighting and the like; as well as the test blast which is proposed to be conducted.</p> <p>It is noted that Eskom concedes that it will need to relocate the ABOPS; but no such concession is made in relation to the Zoo and the endangered parrot breeding facility at the Zoo. There appears to be no reason why the impact on the indigenous Bearded Vulture Breeding program should take precedence over the parrot breeding facility or the other animals in the Zoo.</p> <p>It also appears from the draft EIA that more research and investigations are required in order to assess the impact on the animal and birds at the Zoo.</p> <p>Failing that, it would appear that the relocation of these animals and birds would be required in line with the concession that the ABPOS would need to be relocated.</p>	
24	00071	14 Dec 2016	Aldine Armstrong Eversheds KZN	An 18 page letter of objection with seven annexures was submitted. See end of CCR for letter and electronic disk for appendices of previous correspondence.	A response was prepared and sent. See end of CCR.
25	00072	17 Nov 2016	Judy Marx SA National Roads Agency	<p>Your later dated 2 November 2016 refers.</p> <p>We have noted and are satisfied that our comments of 30 April 2015 and 14 May 2015 have been included in the Environmental Impact Assessment Report.</p>	Noted with thanks.
26	00073	16 Dec 2016	Shannon Hoffman African Bird of Prey Sanctuary	From the findings of the draft EIA report prepared by ACER (Africa) Environmental Consultants it is understood and agreed that the bulk of the African Bird of Prey Sanctuary (ABOPS) activities could not continue adjacent to a sub-station of such proposed scale and proximity. In summary of the factors that would threaten Sanctuary	Thank you for these comments.

No	Ref	Date	Name and Organisation	Comment	Response
				<p>operations and in fact necessitate project relocation, the following points remain relevant:</p> <ol style="list-style-type: none"> 1) The eight proposed transmission lines will make it impossible to safely conduct our daily free-flying raptor displays and therefore remove our primary source of income. This would be due to: <ol style="list-style-type: none"> a. the increased risk of collision and electrocution for the flying birds, and b. interference from the electrical transmission on the tracking devices making it difficult to track their progress and ensure their safety. 2) ABOPS is currently custodian to three critically endangered Bearded Vultures; these are the only birds of their kind in captivity globally. The last 100-odd breeding pairs occur naturally in the Maluti-Drakensberg mountains. This iconic raptor is one of the few animals significant enough to warrant a Biodiversity Management Plan (BMP) to govern its conservation. The aim of this legislated BMP is to provide a cohesive management mechanism to try and prevent the extinction of the species. The BMP was gazetted in South Africa in 2014 (published 8 May 2014 Government Gazette Notice No. 37620) and the plan is aligned with the National Development Strategy in Lesotho. <p>The African Bird of Prey Sanctuary is recorded in the BMP as the implementing agent of the captive breeding operations. The long-term objective of such a captive breeding program is to firstly establish a captive genetic reservoir of 20 to 30 breeding birds and thereafter to be able to produce viable chicks for reintroduction, to bolster the in-situ populations. Our responsibility has been further highlighted by European Union representatives of the Vulture Conservation Foundation (VCF) now endorsing our operations and proposed breeding plan for the species. The <i>critically endangered</i> conservation status of the Bearded Vulture in the regional red data book is such that the precautionary principal must be applied to all aspects of its management, as there is no room for error. It would, therefore, not be acceptable practice to establish a breeding program immediately alongside a sub-station of the proportions that is proposed.</p>	<p>The increased risk during flying displays is noted and addressed.</p> <p>The Bearded Vulture programme has been noted. However, it was not the presence of a sub-station nearby that was found to be a risk but the traffic noise during construction as the cages are close to the road and, possibly, blasting noise as well which were deemed to be unacceptable variables for this critical breeding programme.</p>

No	Ref	Date	Name and Organisation	Comment	Response
				<p>3) The draft EIA findings also concede that noise will have a negative impact on the long-term captive raptors and blasting disturbance is also of high concern especially for breeding birds as the chance of nest abandonment would increase markedly. In fact the construction phase should not commence before the Bearded Vultures have been safely moved.</p> <p>4) We still maintain, and wish to record, that while the draft report states that calculated EMF levels will not present any harm to birds, we believe there has been insufficient research into long term effects on avian species to conclude this and the risk should not be investigated on Red Data Book species.</p> <p>5) Raptors rely very heavily on their sense of sight, so light and any disturbance through visual stimulus remains a concern.</p> <p>6) The aesthetic impact of the sub-station and its radiating lines will also have a marked, negative effect on the natural vistas and ambiance in the area, thus reducing our visitor enjoyment and numbers.</p> <p>The draft report implies that the 'no-development' option has been exhausted and that moving ABOPS to a new location would be an effective mitigation measure. At our present site of operation we have in fact successfully positioned ourselves to perform our conservation functions in a sustainable manner. So, we reiterate, that although our relocation might solve one of Eskom's development challenges, for the Sanctuary it is a high risk venture. If not undertaken with enough resources, care and planning, relocation will jeopardise our project sustainability. The inherent risks arising from the move process itself include the following:</p> <ul style="list-style-type: none"> - Loss of income, disrupted activity and reputational damage. - Translocation mortalities (not all the birds will survive the move). 	<p>Noise was only found to be an issue for the critical Bearded Vulture and in order to mitigate this, the Bearded Vultures would need to be relocated prior to construction.</p> <p>Noted, however, the EMF specialist findings did not identify any increased EMF risk to humans or birds.</p> <p>Noted. Light mitigation measures are incorporated into the DEIAR.</p> <p>Noted although the ABOPS and Mayibuye's vistas are over the valley in the opposite direction from the proposed infrastructure, it is recognised that future transmission lines could have a negative impact but these impacts would need to be considered and mitigated in a separate EIA process.</p> <p>Thank you for these comments. The risks and considerations raised all need to be included and addressed in the negotiation and planning process related to the Sanctuary. [This is being achieved by the development of a formal terms of reference by ABOPS to assist and guide the relocation negotiations and process].</p>

No	Ref	Date	Name and Organisation	Comment	Response
				<ul style="list-style-type: none"> - A percentage of the flying birds will not adapt to the new location and there is an increased risk of the birds flying away when flown at a new venue. - Loss of specifically trained staff if they can't relocate with the Sanctuary. - Loss of client base from the primary KZN commuter zone. - A decade of premises awareness and goodwill is not easily replaced over-night and the reputational damage of a complete location change can't be discounted as a minor consideration but actually poses a major threat to ABOPS revenue stream. - It cannot be assumed that birds currently breeding will automatically breed at the next venue. Best case scenario they will miss a season, worst case scenario, they will never breed again. - Climatically, a new location at a different longitude, will not necessarily suit all species, so some may have to be re-homed. - The actual task of relocating birds will have to be undertaken in-house, as there are no other qualified operators with the skills, resources and authorization to translocate these listed raptor species. The physical burden of translocation will fall squarely on ABOPS shoulders and thus prevent our ability to simultaneously earn an income over this period. This must be recognised and compensated for. <p>Subsequent to the meeting with Eskom representatives held on the 8th of December at ABOPS, and the likelihood of the sub-station becoming a reality, certain considerations come to light. Conceptually we are not just negotiating the relocation of a single home, but are in fact, coordinating the relocation of over 100 homes. But these are the homes of specially protected and highly sensitive raptors, each which will respond differently to the move. The standard relocation procedures and valuation methodology applied to residential and commercial operations may not be suitable in this case. Getting the initial planning and evaluation phases right will be integral to the success of not only the relocation phase, but in order to achieve project sustainability thereafter.</p>	

No	Ref	Date	Name and Organisation	Comment	Response
				<p>For the relocation of ABOPS to be introduced as a mitigation measure, operations would need to be moved to another location in a way that would ensure complete and sustainable continuance of ABOPS functions. If Eskom is not able to adapt their relocation processes to ABOPS needs, then we feel that they will in effect have not achieved their responsibility of successful mitigation as called for in the EIA process. Should the DEA support the ABOPS relocation as a mitigation measure, then we ask that the department hold Eskom to this obligation and commit to the ABOPS relocation in its entirety. Eskom's directive should be to commit to facilitate a structure that would ensure a successful move and a sustainable new facility. This structure must contain enough financial and resource support to provide a buffer offset against the considerable challenges that the Sanctuary is being asked to bear.</p> <p>For project valuation to be successful, it needs to take into account the particular factors that we measure our operations by. The Sanctuary is not a straight forward 'bricks and mortar' type operation and there are also certain intangible values that should be considered. It was agreed that these operational criteria of importance will be put forward by ABOPS in the form of listed 'valuation terms of reference' to Eskom by February 2017. Below are listed some of our required location criteria:</p> <ul style="list-style-type: none"> - The Sanctuary venue must be peaceful and have 'soul'. This both attracts visitors and is conducive to a decent quality of life for the raptors. - An aesthetically pleasing venue is important; either a pastoral view or natural backdrop being a drawcard. - Access to an income generating clientele (for example to have proximity to some sort of compatible income generating activity or client base). - Access to food sources (large animal red meat, day old chicks, bones). - Access to relevant target audiences needed to complete our awareness function, either formally with schools or the general public either affected by or affecting raptor conservation issues. - Manageable access to specialist veterinary services is required. 	

No	Ref	Date	Name and Organisation	Comment	Response
				<ul style="list-style-type: none"> - Raptor Rescue requires a site close to PMB or Howick in order to provide emergency access to people bringing in injured birds. - ABOPS would need to be located in a climate conducive for Bearded Vulture breeding (no further east than our current location). <p>We need to generate new income structures at the new location to facilitate and maintain operational requirements and these structures will be variable and site specific and will require time, careful planning and resources to identify and implement. Other important factors to take into consideration going forward:</p> <ol style="list-style-type: none"> 1) ABOPS operations are made up of two aspects, namely the bird park and display flying operations and the TOPS (Threatened and Protected Species) conservation breeding programs. Separate, but complementary to these operations, is the onsite dedicated raptor rehabilitation facility (Raptor Rescue). The public side of the operation primarily funds the other non-profit breeding and rehabilitation aspects of the work. 2) Partnering these operations, as the landowners from which the Sanctuary holds a 99 year registered lease (Portion 184 of the Farm Vaalkop and Dadelfontein 885), is the Mayebuye Community. Investigation as to how best handle the legal technicalities of land tenure will be integral in concluding a suitable way forward. 3) There are very specific time constraints in and around the BV breeding program that need to be taken into consideration. Although the Sanctuary has been advised to proceed as 'business as usual', this is seems impractical. To ask funders to commit large amounts of money to create infrastructure, only to have them discarded is most wasteful and will certainly not build donor confidence. Once the breeding birds are in place, every time you disrupt or move them, the chance of breeding success decreases, so if the sub-station development is to happen it would almost be better to prioritize by identifying a new location asap and setting up a single breeding venue. The critical status of the Bearded Vultures in the wild and their ongoing decline makes the program urgent and so progress must be implemented each breeding season (June to Nov) in order to try 	

No	Ref	Date	Name and Organisation	Comment	Response
				<p>and prevent the birds' extinction. Any relocation activities would have to be planned outside of this period.</p> <p>In conclusion, any relocation undertaken as a mitigation measure needs to happen in such a way that the African Bird of Prey Sanctuary itself doesn't become a fatality in the process. ABOPS and Raptor Rescue need to be repositioned in a location where they can generate income, as well as keep overheads down to ensure sustainability. EIA approval should be based on the relocation of the ABOPS in such a manner that will not undermine the sanctuary's ability to remain sustainable. If the viability of ABOPS is destroyed in the process, the mitigation measure will, in fact, have failed. Any undue burden on the Sanctuary or its staff through process or reputational damage needs to be taken into account and compensated for. The African Bird of Prey Sanctuary and the threatened and endangered birds for which it is custodian should not be asked to pay a price for Eskom's economic saving achieved by this site selection.</p>	
27	00074	18 Dec 2016	Shannon Hoffman African Bird of Prey Sanctuary	<p>Thank you for opening discussions regarding the proposed Isundu 765/400 KV sub-station and its associated turn-in transmission lines. Subsequent to the two meetings with ACER representative, Paul Scherzer and then Eskom's Annah Motalane, about the proposed expansion of Eskom's transmission network, I would like to please formally reiterate our concerns regarding the impact of such a development on our neighbouring operations.</p> <p>The African Bird of Prey Sanctuary, and the associated rehabilitation centre, Raptor Rescue, currently constitute the biggest dedicated conservation and awareness facility housing indigenous raptors in Africa. All the resident birds of prey at this working facility are protected species and many are CITES listed. We have, in partnership with the Mayebuye Community, been in operation at this site since 2006 and hold a registered 99 year lease on the 60 hectares of land (Portion 184 of the Farm VaalKop and Dadelfontein 885) which lies immediately adjacent to the proposed sub-station. The African Raptor Trust (Reg. No IT 1467/2005/PMB) also operates from this property. The object of this NPO is to aid the conservation</p>	<p>Thank you for these comments. The criteria listed at the end of the submission need to be considered and addressed in the negotiation and planning process related to the Sanctuary. [This is being achieved by the development of a formal terms of reference by ABOPS to assist and guide the relocation negotiations and process, see Appendix 1 for TOR].</p>

No	Ref	Date	Name and Organisation	Comment	Response
				<p>of indigenous birds of prey both in and ex-situ of their natural environment.</p> <p>Part of the unique nature of our operations is that the facility conducts free-flight raptor demonstrations daily from an open-air amphitheatre. Visiting guests participating in these shows fund our operations. This particular site was chosen for its ideal aspect and land gradient providing suitable flying winds, as well as its beautiful natural scenery and views which facilitate both maximum welfare for the raptors and guest enjoyment. The site proximity to both of the largest KwaZulu-Natal cities and the easy N3 highway access also promotes visitor patronage. All these factors were taken into consideration and enable us to support the endangered wildlife in our care.</p> <p>Thirteen species of raptor have also been bred at our working facility. These include the African Grass Owl (listed in the Red Data Book as vulnerable), Taita Falcon (near threatened) and White-headed Vulture (vulnerable). In partnership with KZN Wildlife and Birdlife, we are also the planned breeding station for the critically endangered Bearded Vulture. There are approximately 320 bearded vultures left in the wild, which reside around the Drakensberg mountain range. The skills found at the facility, the site tenure and location supported the initiation of this 20 year project and first two dedicated breeding chambers (to a value of R 450,000.00) have been already been built on the site. The Sanctuary currently houses the only Bearded Vulture of this sub-species in captivity.</p> <p>It was with concern that we heard of Eskom's altered development plans and of the seemingly conclusive decision to now construct the new Isundu sub-station within such close proximity to the Sanctuary. While we fully understand the need for expansion and growth, this form of development is probably the most invasive and potentially detrimental to the Sanctuary possible. The fact that a good portion of the permanently injured and non-releaseable raptors housed at the Sanctuary are power-line victims (of either collision or electrocution) thoroughly confirms this statement.</p>	

No	Ref	Date	Name and Organisation	Comment	Response
				<p>Our concerns regarding the location of the proposed sub-station are two-fold:</p> <p>1) The sheer size of the sub-station and the immediate proximity of the Sanctuary to the hub of the development (approximately 150 m) pose a potential health risk to both the people living permanently on site and certainly the housed raptors. While the effect of electromagnetic fields on humans is argued, the indirect increase in human ailments associated with people living in close proximity to large electrical installations doesn't really seem a risk worth taking. There is, however, proven research that birds are highly sensitive to electromagnetic fields, so it becomes completely nonviable, for example, to take the some of the last remaining species individuals (such as in the case of the Bearded Vulture) and hope for them to breed in enclosures right next to a large sub-station. There is neither time, nor birds available, to explore or argue this risk.</p> <p>2) Due to the unique aerial nature of our operations, overhead cables near, or over, Sanctuary boundaries are of major concern. The radiating transmission lines from the proposed Isundu sub-station pose a serious threat to the core of our Sanctuary business and future educational capabilities. Currently the major lines running parallel to the southern border of our property pose no more than a 25% threat to the birds' safety as they fly in the aerial displays. Considering the distance of the power-lines and that the flight arena faces in the opposite direction, this is currently a manageable risk. Our flying activities have been sanctioned as permissible by the local permitting authority KZN Wildlife for this reason. Any additional lines running to the north or west of the arena obviously increase the collision or electrocution risk considerably. So the flying of the birds at this site could then be advanced from what is currently a controllable activity (where risk is negated through slope aspect and suitable training), into undertaking that which is almost negligent in nature.</p> <p>The operations of the Sanctuary, Raptor Rescue and the African Raptor Trust rely heavily on the solicitation of funds and the development of skills partnerships between multiple NGOs, government departments and the private sector. If our core</p>	

No	Ref	Date	Name and Organisation	Comment	Response
				<p>operations are severely compromised by Eskom's proposed expansion then we will not be in a position to responsibly negotiate or plan future advancements or continue conservation projects of our own. This effectively puts on hold any planning for our future, immediate or otherwise, until such time as a concrete proposal is presented by Eskom regarding this development. We would therefore be most grateful, if we could continue to discuss these challenges and pursue solutions with the relevant Eskom representatives at your earliest convenience.</p> <p>Please can you include in our negotiations the possible options available to us as we proceed amicably and reach a mutual agreement? Would any of the following actions, for example, be considered by Eskom as possible solutions?</p> <ul style="list-style-type: none"> - Alterations to the position or design of the sub-station to accommodate Sanctuary requirements. - Finite and documented expansion plan parameters protecting the Sanctuary's interest long-term. - Offsets for possible Sanctuary relocation. - Compensation for lost assets and/or income potential. <p>I would like to thank you in advance for your consideration and I look forward to hearing from you in the New Year.</p>	
28	00075	20 Dec 2016	TC Ndlela Mkhambathini Municipality	<p>At a meeting of the Full Council held on 7 December 2016, it was resolved that:</p> <ol style="list-style-type: none"> 1. The application for the construction of the Isundu 765/400 kV sub-station and turn-in transmission lines in the Lion Park area, cannot be supported on the basis of the information provided by the consultants which is considered insufficient in addressing Council's earlier concerns. This proposal: <ol style="list-style-type: none"> a) Is incompatible with the municipal SDF and adopted Rural Planning Policy which has gone a long way to encouraging eco-tourism development in this area at great cost to the private landowners, with no commitment to compensation measures should this project proceed. 	<p>Thank you for these comments.</p> <p>The zoning and municipal plans are recognised in the EIA. However, if national electrical transmission lines and sub-stations were only constructed on land zoned for industrial use, it would be impossible for Eskom to meet the power demands of the country.</p>

No	Ref	Date	Name and Organisation	Comment	Response
				<p>b) Is the subject of a land claim which has not been addressed in the submission;</p> <p>c) Impact on the biophysical and socio-economic environment with a negative impact on local employment opportunities which may well be lost should existing businesses be forced to relocate or close down.</p> <p>d) Impacts very negatively on the visual amenity of this area with the potential 60 ha structure being sited in an agriculture/eco tourist area, directly opposite the main entrance to the Big 5 Game Reserve.</p> <p>2. The growth of this municipality's industrial development and the provision of the required level of service infrastructure has been targeted for the Umlaas Road area (south of the N3) which will ultimately extend down the R603. The determination by the consultants of this Lion Park conservation node for future industrial development in order to motivate the placement of the sub-station is not acceptable. Council cannot approve of a development which conflicts with its own SDF and long term development strategy.</p> <p>3. The consultants are again advised to investigate the potential sites previously identified in the Cato Ridge/Harrison Flats industrial area-as this is an industrial land use- which will be in close proximity to the Dry Port which meets their identified criteria of siting sub-stations as close to the demand centres as possible, or alternatively, to return to the approved Sigma site near Wartburg as the requested information regarding the site problems in that locality has not been forthcoming.</p>	<p>The DEIAR does recognise and note that there is an unsettled land claim over the whole area.</p> <p>Localised positive and negative impacts on employment have been considered. However, it should also be noted that many of the developments proposed are yet to be constructed. Biophysical impacts have been considered in detail.</p> <p>Visual impacts have been considered and mitigation measures proposed.</p> <p>The incompatibility of the sub-station with the current land-use framework has already been commented upon.</p> <p>The Municipality has never officially forwarded the coordinates for these 'potential sites' for consideration. Nevertheless, the EAP did investigate the Cato Ridge industrial area and no suitably open areas of the required size or gradient were identified. Once again, as previously explained this sub-station is not being sited near Cato Ridge to supply the Dry Port or local Cato Ridge industry. It is a part of a KZN strengthening programme to improve the entire electrical supply and network to KZN. Thus, criteria such as available space for the sub-station and future transmission lines is an important consideration,</p>

No	Ref	Date	Name and Organisation	Comment	Response
					which make siting the sub-station in already allocated industrial sites nearby existing n national highways difficult.
29	00076	14 Dec 2016	Nhlakanipho Nkwanyana Ezemvelo KZN Wildlife	<p>The Draft Environmental Assessment Report (DEIR) for the abovementioned application has been reviews by the Ezemvelo KZN Wildlife (Ezemvelo) IEM Planning Committee. According to the DEIR, the proposed site is located closed to the African Bird of Prey Sanctuary (ABOP). The site is also characterized by areas that are potential to provide habitat for vulnerable and threatened species.</p> <p>The following biodiversity issues have been identified by Ezemvelo-Avifaunal species:</p> <ul style="list-style-type: none"> Ezemvelo KZN Wildlife is concerned regarding the potential impact of the development on the African Bird of Prey Sanctuary (ABOPS). The ABOPS performs a critical educational function in terms of raptor conservation, more notable highlighting the threats that the various species, specifically South Africa's vulture populations, currently face. In addition, Ezemvelo KZN Wildlife and the ABSOPS have recently commenced the implementation of a captive breeding programme for the Critically Endangered Bearded Vulture. Furthermore, Raptor Rescue which is also located in close proximity to the proposed development performs a vital function in terms of raptor rehabilitation in the province. Numerous individual species are rehabilitated each year and returned safely back into the wild, thereby contributing to the conservation of such species. There is no other similar institution in the province able to perform this function at present and Ezemvelo KZN Wildlife is concerned that the development may impact upon the ability of Raptor Rescue to perform such function. <p>Faunal species:</p> <ul style="list-style-type: none"> It is evident from the report (only a single day field visit) that very little on site verification of species predicted to occur was undertaken. The specialist has indicated that for a number of species, their presence is unlikely and thus any potential impact is negligible, yet no attempt for adequate verification was undertaken. 	<p>Thank you for these comments. Responses to your recommendations are provided below.</p> <p>A detailed terms of reference is being developed to ensure that all the necessary criteria for the ABOPS and Raptor Rescue relocation are considered and addressed.</p> <p>An amphibian survey was conducted in 2017 as suggested. None of the listed species were found apart from the Giant Green-earthworm for which no feasible mitigation measures were recommended, apart from maintaining the integrity of the surrounding habitat. This is already recommended</p>

No	Ref	Date	Name and Organisation	Comment	Response
				<ul style="list-style-type: none"> • The specialist indicates however that a specialist amphibian survey must be undertaken and mitigation implemented prior to construction: <p>Conservation of the species listed below is necessary and vital as they are only found in a small area of KwaZulu–Natal and nowhere else in the world. These species have to be conserved where they occur as they cannot move far to other habitat in the vicinity.</p> <ol style="list-style-type: none"> i. The giant green – earthworm <i>Microchaetus papillatus</i>. ii. The flat – toothed shagreened millipede <i>Camaricoproctus planidens</i>, the visible millipede-<i>Gnomeskelus spectabilis</i>, the urban lumpy keeled millipede <i>Gnomeskelus tuberosus urbanus</i>, the resembling two-toothed slender spined millipede <i>Patinatus bidentatus simulator</i>, the destroyed slender spined millipede <i>Spinotarsus destrutus</i>, the glomerate slender spined millipede <i>Spinotarsus glomeratus</i> and the Maritzburg slender spined millipede <i>Spinotarsus maritzburgensis</i>. iii. The warty hunter snail <i>Gulella euthymia</i> and the jigsaw-piece hunter snail <i>Gulella separate</i>. iv. The spotted shovel-nosed frog <i>Hemisus guttatus</i>. <p>Ezemvelo therefore makes the following recommendations:</p> <ul style="list-style-type: none"> • The specialist report is clear in that the proposed development will impact upon such and cannot be suitably mitigated. Thus, Ezemvelo KZN Wildlife is supportive of the recommendation that the ABOPS be relocated to an alternative property. However, it is imperative that such relocation must ensure that there is no negative impact upon the facilities abilities to firstly provide the much needed educational output and secondly to be able to implement the captive breeding programme for Bearded Vultures. • Ezemvelo KZN Wildlife is of the opinion that the EIA should not be accepted and Environmental Authorisation should not 	<p>as part of the off-set mitigation approach on areas surrounding the sub-station on the same property.</p> <p>Noted.</p>

No	Ref	Date	Name and Organisation	Comment	Response
				<p>be issued prior to an amphibian survey being undertaken. The verification of the riparian species that are present on site is considered necessary because it will assist in making an informed decision. Field sampling should need only a week to be completed provided it is carried out before the end of January 2017.</p> <p>Conclusion In conclusion, if neither of the ABOPS and Raptor Rescue can be suitable relocated on a 'like-for-like' basis, then the authorisation for such development should not be granted. The riparian species survey must be conducted by the specialist prior to an Environmental Authorisation being issued, should the competent Authority feel they have sufficient information to make an informed decision.</p>	Noted.
30	00077	5 January 2017	Marc Hattingh uMngeni Municipality	<p>I refer to your electronic mail and accompanying documentation dated 31st October 2016 in respect of the abovementioned application.</p> <p>The uMngeni Municipality has no comment in respect of this application as the sub-station and transmission lines are located outside the municipal boundaries.</p>	Noted.
31	00078	09 Dec 2016	Dave Rigby	<p>Thank you for your time yesterday. There are two issues why I am opposing the Eskom development. One is from a personal standpoint and one from a national interest standpoint.</p> <p>From a personal standpoint, our company has spent a tremendous amount of time and money in getting our development approved. Eskom's proposal is diametrically opposed to the Municipality's Strategic Development Plan for the area.</p> <p>Our hotel and tourism facility is based on the natural beauty and attractions of the Bird of Prey Centre, the Natal Zoological Park (Lion Park), the proposed Game Reserve developments and local community tourism endeavours.</p>	These issues were all raised and responded to in your previous correspondence on 14 November 2016.

No	Ref	Date	Name and Organisation	Comment	Response
				<p>Our costs thus far in obtaining the necessary permissions to develop in terms of the municipal SDF have been substantial and should this project of Eskom's get approval, we reserve our rights to claim compensation, either from Eskom or the Municipality.</p> <p>The proposed sub-station is at odds with this vision and all our efforts in developing the area into a tourism destination are now in jeopardy. I find it very hard to believe that Eskom cannot find another more suitable site for the development of this sub-station.</p> <p>The area to the west of the Lion Park Road is a conservation area. The proposed Eskom sub-station will impact the natural environment visually, physically and detract from the sense of wilderness it currently enjoys.</p> <p>Secondly, from a national interest standpoint, the Heyns and Hebblethwaite properties constitute the only site available for the development of an airport. In a report done by BKS Engineers of 66 sites identified, this site was the only site which met all the criteria to develop an airport which could accommodate jet aircraft. (737 – 747) Should this site be lost due to the Eskom project, Pietermaritzburg and the Midlands lose the one and only site to develop such an airport. In addition to this loss, the Province of KZN loses the ability to provide King Shaka Airport with a diversion airport, which effectively means that King Shaka airports' potential will never be realised as an international airport.</p> <p>In the light of the above, I respectfully request that Eskom prioritize their search for an alternative site to the Isundu Sub-station.</p>	

32	00079	09 Dec 2016	Hennie Heyns, Samaria Safaris/Aloe Wildlife Estate	<p>Following our meeting on site yesterday, I am following up, and summarising my objection, and concerns regarding the proposed Eskom sub-station.</p> <p>There is no denying the fact that there will be an impact on our development of a retirement residential eco estate.</p> <p>To what extent this impact would be, nobody could possibly know for certain. However, it is certain that approximately 150 of my 350 proposed houses will be visually impacted. As well as the 100 affordable housing sites.</p> <p>I would have to disclose to all of my potential buyers, the building of this sub-station, even before Eskom commence. This will greatly influence their confidence to buy and build.</p> <p>All the actions of avoiding impact, and good intentions in the world, cannot avoid this fact.</p> <p>No developer in his right mind would venture developing this section, unless and until, all the sites have been sold, and every owner is aware of Eskom's intention. Sketches and drawing of the various views would have to be presented. Undertakings would have to be given by Eskom that what is presented is in fact all the impact current, and future. The developer cannot and will not be held liable.</p> <p>The scoping plan of the local municipality has always been tourism and residential. We have spoken enough about this. I have invested a great deal of money and 12 yrs of my life to put this all together. Any deviation or sterilisation of any part of our development would be very unfair, and cause serious complications and financial loss. I have suggested compensation, to either have all the impacted sites removed, or sold at a much reduced rate. I invite Eskom to enter into negotiations for just, acceptable compensation, before commencement, and before I, as an affected party and neighbour, could support the building of the sub-station on the proposed site.</p>	<p>There is no direct impact upon your property apart from the 2011 VSHA transmission line servitude on the very eastern edge which you have already taken into account in your development plans.</p> <p>This is noted. However, there are many other aspects that may or not also affect potential buyers' confidence to buy such as land claims, the uncertainty of what may be developed upon RCL Foods' properties should they be sold, the unplanned development occurring south of the Lion Park etc.</p> <p>Viewsheds have been provided in the Visual Impact specialist study and the planting of screening trees on your property has been included into the mitigation measures in the Final EIAR.</p> <p>The municipal plans have been taken into account. The previous Kingsthorpe development you proposed was appealed successfully as RCL Foods claimed they had not been informed of the EIA nor had their issues of concern been addressed. No response was submitted by the applicant to the appeals and the Department upheld the appeal. This previous financial loss cannot be blamed on either municipal land-use planning criteria or 'added' to Eskom's responsibility.</p> <p>Eskom cannot consider compensation for a development not yet developed that is not directly affected by Eskom infrastructure. Mitigation measures to address any possible indirect visual impact have been proposed in the DEIAR. However, it must also be noted that the eastern side of your property is largely undeveloped and there is another erf between your proposed</p>
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					development and the sub-station. The approximate distance between your nearest housing area and the proposed sub-station is 1.5 km, whilst you have also placed a large housing development area alongside the existing 275 kV transmission line that traverses your property.	
33	00080	22 Dec 2016	Reka Kallicharan KZN EDTEA	B-	A 6 page letter of comments was received. See end of this CCR.	A response was prepared and sent and an Authorities meeting was held in response. See end of this CCR and Appendix 2.
34	00081	30 March 2017	N Sontangane DAFF		<p>The Department of Agriculture, Forestry and Fisheries (DAFF) appreciates the opportunity given to review and comment on the DEIAR for the above development. DAFF through the sub-directorate Forestry Regulations and support is the authority mandated to implement the National Forestry Act, Act No. 84 of 1998, by regulating the use of natural forests and protected tree species in terms of the said Act.</p> <p>With reference to the document received the sub-station site is occupied by a farm under natural vegetation (mostly grassland) which is mowed regularly, baled for hay production and sold as the main economic activity on the farm. This takes place across the whole site, excluding area under thicker/bush. There are several plant communities identified within the study area which include the occurrences of <i>Acacia nilotica</i> (dominating woody species) tall closed grassland/short thicket mosaic and <i>Acacia robusta</i> (dominating species) short thicket.</p> <p>With regard to the towers site the final placement of towers along the preferred alignment will be determinant at a later stage, during a specialist walk down.</p> <p>There are a number of impacts which can be minimised through strict enforcement of an EMPr during construction, rehabilitation and the operation phase. The department supports the recommendation outlined in the EMPr and recommend that the following conditions are adhered to:</p> <ul style="list-style-type: none"> • Sensitive areas of vegetation should be avoided, firstly, by routing the transmission around sensitive vegetation or secondly, 	Thank you for these comments. These points will be reviewed and included in the Final EMPr where applicable.

				<p>routing over sensitive vegetation. This will require replacement of towers within transformed/ degraded areas.</p> <ul style="list-style-type: none"> • It must be taken into account that where sensitive vegetation is found within the servitude stringing of the conductors should be done via helicopter, or shot the sensitive vegetation of the conductors should be done via helicopter, or shot over the sensitive vegetation (irrespective of topography), where significance of impacts associated with vehicular movement in the servitude between towers will be high. In these situations, operational maintenance will also need to be done via helicopter to avoid impacts associated with vehicular movement in the servitude between towers. • Clearance of indigenous forest/thicket across ravines and gullies should not be permitted, as these areas will very rarely interfere with minimum conductor clearance requirements. These areas should be spanned • Where new tracks are required to access tower sites, input from a vegetation specialist is to be obtained and sensitive areas of vegetation and wetlands are to be avoided • The undertaking of a targeted survey prior to construction to rescue any protected or rare/threatened vegetation species. This needs to be done at the right time of the year for flowering and any protected plants or trees to be impacted will also need to be identified. • Prior to construction of towers, input from the vegetation/wetland specialist and the fauna specialist is required on the final location of towers, and the sensitive area of vegetation and habitat to avoid. • Should there be a need to disturb indigenous trees in a natural forest and/or protected trees in terms of the National Forestry Act, permits or licences must be obtained from DAFF offices in Pietermaritzburg prior to construction. Eskom's environmental manager must ensure that these processes are commenced timeously. <p>This letter does not exempt you from considering other environmental legislation. Should any further information be required, please do not hesitate to contact this office.</p>	
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35	00082	19 April 2017	NM Mokoena DWS	<p>Reference is made to above-mentioned report received by this Office on the 08th November 2016. This Department has the following comments with regard to the proposed development:</p> <p>(1) WATER USE AUTHORISATION/WETLANDS AND WATER COURSES</p> <p>(1.1) It is noted from the above-mentioned report that the Applicant has delineated all wetlands according to this Department's guideline titled "<i>A practical field procedure for identification and delineation of wetlands and riparian areas</i>" (DWAF , 2005), and the Applicant is well aware that the proposed project will trigger Section 21 (c) and (1) of the National Water Act, 1998 (Act No. 36 of 1998) (NWA). However, this Department advises that a Water Use Authorisation Pre-Application meeting be arranged with Ms Zamashenge Hadebe who can be contacted on 031 336 2700/67.</p> <p>(1.2) It is understood that during operation, sewage flows will be minimal and sewage will be directed into a sealed conservancy tank of less than 10 000m³. Please note that installation of a conservancy tank will trigger Section 21 (g) of National Water Act, 1998 (Act No. 36 of 1998) (NWA).</p> <p>(1.3) If the proposed development/project engages or proposes to engage in one or more water uses that require a Water Use Licence in terms of the NWA, then by default all other water use activities taking place on that property, irrespective if it would be regulated by a General Authorisation, would be required to apply for a Water Use Licence. This is part of the Integrated Water Use Licensing process.</p> <p>(1.4) There must be no unacceptable impact on the quality of both surface and groundwater in the area arising from the said development. Any rivers, associated tributaries and drainage lines must be protected at all times and must not be degraded by activities arising from this development.</p>	<p>Thank you for these comments.</p> <p>A Water Use Licence Authorisation process is being undertaken in parallel with this environmental assessment.</p> <p>Noted.</p> <p>A Water Use Licence Authorisation process is being undertaken in parallel with this environmental assessment.</p> <p>Impacts will be controlled and monitored through implementation of the EMPr.</p>
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			<p>(2) STORMWATER MANAGEMENT</p> <p>(2.1) It is imperative that stormwater is properly managed along the proposed project route both during and after construction.</p> <p>(2.2) After construction, the area should be contoured to ensure free flow of runoff and to prevent ponding of water.</p> <p>(2.3) Drainage must be controlled to ensure that runoff from the project area will not culminate in off-site pollution or result in damage to properties downstream of any stormwater discharge.</p> <p>(3) SOLID WASTE MANAGMENT</p> <p>(3.1) It is noted from the above-mentioned report that Durban Solid Waste (DWS) is currently responsible for provision of waste collection.</p> <p>(3.2) All solid waste generated at the proposed development, prior to being collected for safe disposal must not cause health hazard or any surface and groundwater pollution. Such waste must be stored under cover, in a designated storage/collection area; access control to this must be properly managed.</p> <p>(4) SEWAGE AND WASTEWATER MANAGEMENT</p> <p>(4.1) It is understood that portable toilets will be provided and utilised during the construction phase. It is this Department's experience that projects of this nature may result in the generation of small volumes of water containing waste. In this instance, the following is applicable:</p> <ul style="list-style-type: none"> • Water containing waste must not be discharged into the natural environment; and • Measures to contain the water containing waste and safely disposal of it must be implemented. <p>(4.2) It is noted from the submitted report that conservancy tank of less than 10 000m³ will be utilised during the operation phase. Please note that it has been this Department's experience that such a system (conservancy tank), if not properly managed, can result in a number of health, aesthetic and environmental</p>	<p>A Stormwater management plan has been prepared as part of the Water Use Licence application.</p> <p>This appears to be a copy and paste error. This project does not fall under the DWS's jurisdiction.</p> <p>Noted.</p> <p>This is addressed in the EMPr.</p> <p>Due to the few people on site during the operational phase of the sub-station, Eskom regards the conservancy tank as an acceptable option.</p>
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				<p>problems, and is therefore not generally a favoured option. The high cost to both the developer and the municipality can result in the use of such a system being unsustainable in the long term. However, should it be deemed as being the BPEO, then the following conditions are applicable:</p> <ul style="list-style-type: none"> • The tank must be provided with a fresh air inlet and an intercepting grease trap; • The tank must have an airtight manhole cover to allow access to the tank for the removal and safe disposal of the tank contents; • No industrial waste or refuse may be discharged into the conservancy tank except by written agreement with the relevant authorities; • The size of the conservancy tank must be determined by both the frequency of removal of its contents to the local Wastewater Treatment Works and by the quantity of sewage anticipated from the above-mentioned project. Written confirmation must be obtained from the local municipality stating that it will provide the service of removal of the tanks contents; • The contents of the tank must be removed by a vacuum tanker and conveyed to a local Wastewater Treatment Works that is capable of processing the volume and contents of the conservancy tank. Ongoing writing confirmation must also be obtained from the local municipality and retained as proof that the contents of the conservancy tanks have been received for proper treatment at the said wastewater treatment works; • A contingency plan must be drawn up to protect against overflow of the conservancy tank. A sump or lined pond can be designed below the conservancy tank to contain any overflows; • Ingress of stormwater into the conservancy tank must be prevented; 	<p>The conservancy tank will be designed and constructed according to recognised engineering standards.</p> <p>This is not applicable. Due to the low number of staff on site and the rural nature of the area, Eskom will be responsible for arranging for the tank to be emptied when required. It is envisaged that Eskom will probably enter into a service level agreement with the owner/operator of the local water treatment works at an appropriate time once construction is complete.</p>
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				<ul style="list-style-type: none"> • The conservancy tanks must be located out of the 1:100 year flood line of any water resources or alternatively, more than 100 metres from the edge of a water resource or a borehole which is utilised for drinking water or stock watering, whichever is further; and • A detailed Geotechnical Investigation must be done to determine the most appropriate location of conservancy tanks <p>(5) EROSION CONTROL</p> <p>(5.1) Soil erosion measures must be implemented minimise soil erosion during the construction phase.</p> <p>(5.2) Erosion control measures to be implemented in areas prone to erosion such as near water supply points, edges of slopes, etc. These measures could include the use of sand bags, hessian sheets, retention or replacement of vegetation.</p> <p>(6) GENERAL</p> <p>(6.1) This Department notes the content and recommendations made on the following studies:</p> <ul style="list-style-type: none"> • The Aquatic and Riparian Ecosystem Specialist Report, dated 23 November 2015, prepared by Ground Truth Water, Wetlands and Environmental Engineering; • Assessment of Anticipated Hydrological and Geohydrological conditions for the Proposed Project, dated December 2015, prepared by Earth Science Consultants; • Hydrological Assessment for the Proposed Project, dated May 2016, by GCS water and Environmental Consultants; • Vegetation and Wetland Specialist Study, dated September 2015, by ACER (Africa) Environmental Consultants. <p>(6.2) This Department notes the content (i.e. responsibilities and conditions) as outlined in the Draft Environmental Management Programme (EMPr) for the above-mentioned project, dated October 2016. Compliance to the approved EMPr must be audited regularly by the designated Environmental Control Officer (ECO.)</p>	<p>Geotechnical investigations have been done on the site. The design engineer will be provided with this information.</p> <p>Erosion is addressed in the EMPr and Stormwater Management Plan.</p> <p>These points are noted and will included in the Final EMPr where applicable.</p>
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			<p>(6.3) Adequate measures must be put in place to protect all water resources that flow adjacent to, as well as through the proposed project area, from being polluted and/or degraded. Visible markings showing/demarcating the buffers must be provided on site during the construction phase. If pollution of any surface or groundwater occurs, it must be immediately reported to this Department and the appropriate mitigation measures must be employed.</p> <p>(6.4) No form of secondary pollution should arise from the disposal of sewage and refuse. Any pollution problem arising from the above-mentioned development is to be addressed immediately by the Applicant.</p> <p>(6.5) Storage of material, chemicals, fuels etc, must not pose a risk to the surrounding environment and this includes surface and groundwater. Such storage areas must be located outside the 1:100 year floodline of any watercourse and be fenced off to prevent unauthorised access into the area. Temporary bunds must also be constructed around chemical or fuel storage areas to contain possible spillages.</p> <p>(6.6) Ecological sensitive areas and their appropriate buffers must be protected and should not be degraded by the activities arising from the proposed development.</p> <p>(6.7) A Spill Contingency or Emergency Response Plan must be drawn up and should include the following actions that need to be taken into account in the event of a spill:</p> <ul style="list-style-type: none"> • Stop the source of the spill; • Contain the spill • All significant spills must be reported to this Department and other relevant authorities; • Remove the spilled product for treatment or authorised disposal; • Determine if there is any soil, groundwater or other environmental impact; • If necessary, remedial action must be taken in consultation with this Department; and • Incident must be documented. <p>(6.8) Notwithstanding the above, the responsibility rests with the Applicant to identify any source or potential sources of pollution from his undertaking and to take appropriate</p>	<p>Emergency and spill protocols are addressed in the EMPr.</p>
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				<p>measure to prevent any pollution of the environment. Failure to comply with the requirements of the Nation Water Act, 1998 (Act No. 36 of 1998) could lead to legal action being instituted against the Applicant.</p> <p>Please do not hesitate to contact this Office should you have any concerns, comments or queries.</p>	
36	00083	15 Feb 2017	G Apelgren-Narkedien	<p>This correspondence serves to acknowledge receipt of the request for comments regarding the above mentioned subject.</p> <p>Kindly be advised that the KZN Department of Human Settlements has no objection to this development as there are no human settlement projects planned at this stage in this area.</p>	Noted. Thank you.
37	00084	15 Feb 2017	Hetta van der Walt Sappi	<p>Would it be possible for us to get the shape files of the line and substation as we need to overlay it on our property maps to understand the impact that it would have on our plantation and property.</p> <p>The portion of the line is not going through our plantation as per map below.</p>	<p>The relevant kml files were sent.</p> <p>Noted, thank you.</p>
38	00085	16 March 2017	David Bozas Mayibuye Game Reserve	<p>I have just had a meeting with Elaine Donaldson who tells me that you stated that I supported the substation which is opposite our game reserve development gatehouse. I am not sure how you arrived at that but for clarity and avoidance of doubt we are fully opposed to this substation.</p>	<p>I don't recall stating that at all. Unless she misunderstood when I mentioned that we had agreed previously during the VSHA that the transmission line route should follow the existing line so as to minimise any impact and that this is still being adhered to. Your objections have been noted and recorded in the Isundu EIA.</p>
39	00086	22 May 2017	David Bozas Mayibuye Game Reserve		<p>Email – EAP to I&AP: I just want to update the Isundu EIA with current developments. Please can you give me a brief summary update on Mayibuye's progress i.e. what is currently being constructed, what big five animals you have brought in and what hotel and housing sites have been sold already etc.</p> <p>Also I just want to clarify - are you fencing the big five in one area of the reserve, whilst you construct in other parts or is it just a single fence around the outside of the reserve and construction</p>

				[ACER received no response to this email]	will occur with game guards or something like that.
40	00087	22 July 2016	Aldine Armstrong Eversheds (Representing RCL Foods)	<p>[Eversheds send this correspondence directly to Eskom and never copied it or submitted it to the EAP directly as part of the EIA process. The focus of the letter was in regard to the RCL's appeal of the transmission line, however, the majority of the issues raised related to the sub-station application and were prior to the DEIAR being finalised. The EAP includes this letter in the CCR as it provides a background to some of the RCL alternatives and issues addressed in Section 4.4.1 of the FEIAR.]</p> <p>In an effort to fully understand the proposed Isundu substation and powerline proposal and to potentially resolve the issues relating to the powerline corridor and proposed Isundu Substation, and in response to the meeting held with the Department of Environmental Affairs on the 13th July 2016, RCL makes the following proposals and requires the following information.</p> <ol style="list-style-type: none"> 1. The most appropriate, cost effective and successful mitigation would be to consider an alternate site for the Substation. RCL may be prepared to sacrifice less sensitive sites in order to accommodate Eskom. RCL has provisionally identified the sites attached on Annexure A for further consideration. Further detail will be forthcoming, and Mr Van Houten can contact Mr Korf Stoltz directly to facilitate site visits. Sites 1 and 2 belong to RCL which RCL could consider selling to Eskom on a willing seller willing buyer basis. There will be timing considerations that will need to be taken into account. The other properties belong to other third parties. Should the substation be developed on any of those properties, they will be more compatible than RCL's current properties adjacent to the proposed substation site that will be affected, and far more cost effective in terms of compensation that may need to be paid for potential loss of income than that of RCL. Mr Stoltz can be contacted on [contact details were provided] 2. The alternative corridors may have to be reconsidered, or an amendment to the approved corridor considered. A consideration of the comparative matrix in the Powerline EIA shows that the western corridor and the central corridor were very similar. The existence of the RCL facilities, even without 	Eskom's response has been included in Appendix 2.

				<p>consultation with RCL, should have made the central corridor the preferred corridor. This needs to be revisited. Input from RCL should result in either the central corridor being preferred or an amendment to the western corridor, taking into account the proposed alternate sites for the substation at annexure A. The substation sites would need to be considered within these alternate alignments.</p> <p>It is unlikely that the RCL layers and breeders facilities and the Eskom infrastructure can sustainably co-exist, particularly if blasting is to take place. In any event in order to fully understand the impacts of the powerlines and the proposed or alternate substation RCL requires:</p> <ol style="list-style-type: none"> 3. Confirmation as to whether or not blasting will take place. Is there an alternative to blasting - building platforms up as opposed to blasting flat, or pecking? A blasting schedule, including time frames and number of blasts is required. 4. A sketch of the proposed passage for the 765 kV lines going across RCL's properties and where it will enter the proposed substation, and where the 400 kV lines will exit. 5. A construction programme and time lines for the powerlines. 6. A construction programme detailing the construction activities and the time line of construction activities. 7. A specialist report detailing the vibrations, noise and pressure waves resulting from the blasting is required, as well as a veterinarian's report on the blasting on layers and breeding chickens. 8. What are the vibration levels that will be created by other construction activities such as used of heavy machinery and excavators as well as drilling, and how is this proposed to be mitigated to a best case scenario? 9. A Geotechnical report of the proposed substation. Has any detailed design been done on the costs estimates? What evidence is there to suggest that the same foundation problems as has been identified at the Sigma substation will not be present at the Isundu substation? 10. The detailed design that was done on the Sigma substation or on any substation that Eskom has previously designed or 	
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				<p>established in order to provide an indication of what is entailed for the development of the substation.</p> <ol style="list-style-type: none"> 11. What levels of dust as parts per million are anticipated by the establishment of the powerlines and the substation, and how is this proposed to be mitigated, besides the possible enclosure and ventilation of the houses. Significant amounts of earth removal and movement will be required for the substation from the construction. At the time of the presentation in November 2015, there was still a high degree of uncertainty as to the tolerance of rearers and layers in respect of dust, and the volumes of dust to be generated. Updated dust production reports are required providing this specific detail. Veterinarian reports indicate that dust would create health impacts on the birds. Even if the farms could be enclosed, which RCL had agreed to consider, the level of dust generated needs to be understood as the volumes may not be able to be adequately controlled given that air will be entering the houses through the ventilation systems. 12. Details on lighting during construction and during operations, including how many lights, timing, intensity, height and directionality. A sketch of the lighting is also required. 13. The level of noise that will be generated by the construction of the substation and powerlines, as well as the noise that will be generated by the maintenance thereof (e.g. helicopters- to what degree is the noise of helicopters dissipated by distance?) Details of best case mitigation measures and levels is required. 14. How will the noise from the hum and corona of the powerlines be mitigated? What are the decibel levels of this corona, and the degree of pressure waves and how are they dissipated by distance? 15. How does Eskom propose to mitigate biosecurity issues by risk of personnel transfer of disease. Does Eskom propose to fence off the RCL property? If personnel are used to maintain the powerlines as opposed to helicopters, how many persons are required and how do Eskom propose to mitigate that risk of biosecurity? 16. What is the proposed access road to the substation, and how many trucks will be using this per day during construction? 17. The EIA documents arising out of the powerline EIA, the Sigma substation and the scoping for the Isundu one state that in the 	
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			<p>event that impacts cannot be mitigated physically then compensation will be paid. Can Eskom compensate RCL for:</p> <ol style="list-style-type: none"> a. The approximate R16 million rand to enclose the two affected chicken farms known as L12 and L14; b. The cost/ provision of the increase in power over notified load due to the enclosure and ventilation of houses. The waiver of any penalties due to increase in power over notified load; c. The of loss of production that may result in instances due to construction or operational impacts from the powerline or substation as per the schedule attached hereto marked B; d. The loss of production in the sum of R28 million per farm in the event of the loss of an entire production cycle; e. Consequential losses resulting from contractual obligations to, for example KFC, Chicken Licken and Woolworths; f. Will Eskom be prepared to provide an undertaking in terms of the above? <p>RCL will consider the above information and assess it in terms of the cumulative impacts the proposal may have on RCL's operations. Much of this will be contingent upon whether or not blasting will take place. However, as stated above the most effective mitigation measure that RCL is more than happy to assist with and to accommodate Eskom, is to move the proposed substation site. We look forward to receiving the above information.</p>	
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