

TAG – Tesselaarsdal Action Group
c/o P O Box 461
Caledon
7230
Western Cape Province
Friday, 22nd May 2009

To: NMA Effective Social Strategists
Att: Ms Theo Hansford
No.8 7th Avenue
Parktown North
Johannesburg
2193
eMail: theoh@nma.org.za

Dear Ms Hansford,

RE: DRAFT ENVIRONMENTAL SCOPING REPORT FOR THE PROPOSED BANTAMSKLIP NUCLEAR TRANSMISSION INTEGRATION PROJECT – APPLICATION 2 – DEAT REF. NO. 12/12/20/1212

Herewith please find a supplementary response to the Draft Scoping Report (DSR) issued in the above-mentioned regard, which should be read in conjunction with our preliminary response document addressed to you, dated 30th April 2009. Attached is a copy of our current TAG membership list (Annexure Aa), all being interested and affected parties with regard to the proposed high-voltage power line routes, specifically Alternatives 1, 2 and the ABI route proposal.

This response is being submitted to you now in order to comply with the extended public participation period which ends today. However, as you know, we have requested a postponement of the finalisation of this Scoping Report until at least August 2009 for the reasons stated in our letter to Ms Natalie Ritsch of Arcus Gibb dated 07 April 2009, not least of these reasons being the fact that we, as directly affected parties by the proposed routes, received no official notification of the project proposal and as such were not given the opportunity to participate in the scoping phase since its inception in July 2008.

As this is the case, this response document is being submitted with the qualification that it is an interim response, and in no way should be considered as our final or complete reaction. Please bear in mind that this response is being submitted by lay-people, and that time constraints and the sourcing of data regarding the specialist fields covered by the DSR make this a very challenging exercise. For these reasons, we also ask that this reaction document be considered without prejudice to our rights to further pursue our request for additional time, in order to more fully research the specialist topics and provide our feed-back accordingly. Failing that, we reserve the right to seek procedural and/or legal recourse, given that we consider the DSR and its conclusions to be substantively flawed for various reasons, not least of which being that insufficient consideration was given to our Tesselaarsdal/Farm 811 and adjoining small-farm community.

This response document is structured as follows:

1. Supplementary comments regarding the proposed project, the study area and the EIA process.
2. Supplementary comments regarding the other DSR specialist reports pertaining to land capability, flora, fauna, avifauna, social, heritage and visual aspects.
3. General comments / issues of concern.
4. Conclusion
5. Annexures

Please note that when the terms 'our community' or 'this community' and 'Tesselaarsdal' are used in this document, we define this as being everyone on Farm 811 and the adjoining small farms that have traditionally been part of the Tesselaarsdal (previously Hartebeestrivier) settlement, which include the groupings within this locale of Solitaire, Steyntjiesfontein, Tesselaarsdal village and Bethoskloof (Bietouskloof). Farm 811 consists of 487 sub-divisions, of which one has a further 89 RDP housing development sub-divisions.

Please also note that we have limited our comments regarding the various specialist reports to points that specifically pertain to Tesselaarsdal and its context, for the most part. We hope that at least some of our comments might also be applied to, and be of relevance to, other areas impacted by the proposed routes, and might hopefully lead to more considered assessments of all the proposed routes.

Where portions of this document include repeats of sections from our response document dated 30th April 2009, in order for additional comments to be added, such additional comments are in colour.



**REGIONAL MAP SHOWING THE LOCATION OF TESSELAARSDAL
(EXTRACTED FROM THE DRAFT THEEWATERSKLOOF SDF)**

1. Supplementary comments regarding the proposed project, the study area and the EIA process.

DSR Volume 1 – Executive Summary – page 6 - description of the major towns and municipalities on the Bantamsklip-Bacchus study routes makes mention of Middelton (per the draft Theewaterskloof SDF the correct spelling is Myddleton), which is geographically smaller than Tesselaarsdal and quite possibly has fewer inhabitants than we do. In addition, the historical, expansion, development and the eco-tourism possibilities of Myddleton are significantly less than those of Tesselaarsdal. Notwithstanding all of these factors, the list makes no mention of Tesselaarsdal, even though two (three if one includes the ABI route) of the proposed route corridors go right over our community.

2. Supplementary comments regarding the DSR specialist reports pertaining to land capability, flora, fauna, avifauna, social, heritage and visual aspects.

Appendix K: Land Capability Impact Assessment

DSR Volume 1 – Baseline Environment – page 8-1 (part of last paragraph)

“The potential impact of the proposed power lines may have on general agriculture will depend on the specific land use along the proposed power line routes. The more intensive the land use activity, the greater the impact.” This could also be taken to mean that the smaller the size of the individual properties, the greater the impact. Tesselaarsdal / Farm 811 consists of 487 sub-divisions, ranging in size from about 2000m² to the single largest being some 136Ha in extent.

Herewith some more detail regarding the various land use categories in Tesselaarsdal/Farm 811:

- Single residential properties - RDP housing units (89) and family homes. Phase 2 of the RDP housing project to commence shortly (110 houses), these houses will not be constructed in cluster development format but on individual properties, whose owners are too poor to build homes for themselves.
- Businesses & non-residential properties –

Shop (1)	Spaza shops (3)
Bottlestore (1)	Shebeen (1)
B&B / Guesthouses (2)	Restaurants (2)
Schools (2)	Kindergarten (1)
Community Halls (2)	Churches (4)
Sportsfields (1)	Graveyards (15) (most on private land)
Pottery (1)	

Proposed future development of public facilities:

 - Children’s playground (2)
 - Refuse collection point (2)
 - Clinic (1) (currently a mobile clinic visits Tesselaarsdal on a weekly basis)
 - Adult vocational training centre (1)
 - Museum (1)
 - Tea Garden (1)
 - Home Industry shop (1)
- Rural Residential properties –
 - Homes
 - Subsistence gardens
 - Subsistence livestock
 - Specialist farming
 - Home industry
- Intensive agriculture –

Cattle	Sheep
Pigs	Horses
Goats	Dairy
Vegetables	Beekeeping & honey production
Protea & fynbos nursery	Fruit
Vineyards	Essential oils – cultivation & distillery
- Central & communal subsistence gardens using ‘leiwater’ furrows - currently no longer in use. It is planned to reinstate this cultivation and watering system in the future.

Some additional points regarding land use aspects in Tesselaarsdal that must be taken into consideration:

- Farmers in Tesselaarsdal make use of organic farming practices for the most part, either as a result of these practices having been handed down since the earliest slave inhabitants, or due to the modern trend by new inhabitants to revert to the purer way of living and farming. Tesselaarsdal has never been farmed intensively, especially not during the era of copious organo-phosphate usage – specialist farmers are far more environmentally aware and their practices are organic in nature, with the result that the soil in this area is largely uncontaminated and healthy, especially when compared to other land in the region that has been commercially farmed. With the growing trend towards more environmentally friendly practices, Tesselaarsdal is ideally placed to make the most of its resources to cater to this trend. Routing high-voltage power lines in the vicinity can only be considered as having a negative impact on this promising potential.
- The National Government supports the idea and establishment of ‘Agri Villages’. Tesselaarsdal is already just such a community, which traditionally has evolved around its residents being seasonal and permanent farm workers on surrounding farms in the area. There is an ever increasing trend amongst farmers to ferry their workers from their own homes to their farms on a daily basis. Tesselaarsdal is unique in that it already has a long-standing history and culture of being a small, subsistence farming environment supporting

this type of community. Family members also have the further opportunity to become involved in community projects either within their own homes, or at the churches, schools, clinics etc. whilst the men or other family members go off to work, thus furthering their skills sets and also potentially supplementing their family's income.

- A similar case in point is the “Uitspanning” community on nearby Dunghye Park – ownership of this property is in the process of being transferred to the farm workers and their families as part of a BEE initiative. Their portion of land, and that of the Tesselaarsdal community is small compared to the surrounding commercial farms, so whilst being suitable for subsistence farming, the people will also become increasingly dependant on community projects and initiatives like eco-tourism or organic farming in order to earn a livelihood. As the people become more skilled, the use of the land will improve and become more intensive. Again, routing high-voltage power lines in the vicinity of either of these promising communities can only be seen as having a negative impact on their future potential.

- Land use is directly linked to the availability of fresh water sources. In Tesselaarsdal, the mountain area above the village is the source of the domestic supply for this area, in the form of a spring and a borehole. Bethoskloof has its own domestic supply, also in the form of a spring and a borehole. Both these water sources are fed by underground water reserves that stem from the Kleinriviersberge to the south of Tesselaarsdal / Farm 811. The proposed Alternative 1 and 2 routes both cross our water sources – this raises deep concerns regarding the construction phase of the proposed high-voltage power lines as well as the maintenance phase, in terms of contamination of the water sources and potential erosion issues as result of the construction process, not to mention concerns regarding the effect of EMF's in constant and close proximity to our underground water sources as the lines traverse the mountains.

The Klein River and the Hartebeest River both run through Tesselaarsdal /Farm 811, and are not only the life-blood of the community, but form ecological corridors throughout. As such these need to be protected, as the current and future development of this community depends on the quality and availability of water. The water courses also have the potential of being another facet of future eco-tourism, particularly with regard to avifauna and flora in the area. There are a number of sources that have not yet been made use of, and these and the existing sources of water should not in any way be put at risk by the negative impact associated with the positioning and construction of multiple high-voltage power lines in their proximity. It must be borne in mind that the water supply will be the basis on which the community can re-establish its self-sufficiency with regard to food production, in an effort to counter the extreme poverty being experienced. Another poverty alleviation initiative would be the clearing of alien vegetation from these water courses, which could provide work to members of the community for some time, as would the maintenance and monitoring of re-growth. All of these aspects, whether current or of a potential nature, would be negatively impacted by having high-voltage power lines in close proximity.

- Land ownership is integral to the pride of the community, many of whom were previously disadvantaged. Their ancestors were slaves on this land. It was given to them, sustained and continued to be worked irrespective of the set-backs of apartheid, the lack of funds, the inability to access loan-funds, and the lack of formal training. Reducing the land value, land useage and the associated potential of this community even further by positioning multiple high-voltage power lines anywhere near this community would simply be unconscionable.
- The relatively small overall property sizes that make up the Tesselaarsdal community will magnify the impact of such power lines – the land on which the pylons would stand is forever lost, and the servitudes would limit the land useage of these small properties even further. It must be noted that Tesselaarsdal property sizes are on average considered to be small-holdings and are not economically viable agricultural units (viable units for grain production being 400Ha and over).
- Such pylons and anchors would have an effect on the movement of agricultural machinery and equipment, especially on properties where intensive and diverse farming practices take place.

It is clear that both Alternatives 1 and 2 (which directly affect us) are of the preferred options recommended by this specialist, and as such we would like to emphasise that the Tesselaarsdal

community and its needs must be given due consideration following on from both of the TAG response documents, and that this specialist should also then recommend that any corridor currently in our proximity must be shifted away from us completely.

Appendix L: Flora Impact Assessment

Tesselaarsdal is a community with immense eco-tourism potential due to the wealth of flora, fauna and avifauna that is in this area, so whilst there may currently be a lack of protected areas, this does not make the area any less sensitive, and such protected areas can and will be put in place in the future - to safeguard the environment and the income earning potential through eco-tourism that could generate. Per this specialist's report, we are privileged to find ourselves in a highly sensitive floral area, and it is our intention to preserve this fragile ecological treasure.

Attached Annexure Bb includes two articles that demonstrate the interaction of the region's fynbos heritage with business, conservation and work-creation aspects, all of which are fundamentally affected by the tourism interest in this unique natural resource.

Appendix M: Fauna Impact Assessment

The Tesselaarsdal area has been shown to include many portions that have been rated as highly sensitive by this fauna specialist report. As such it further substantiates our claim that this community has an immense eco-tourism potential which it can work to promote and generate in the future. Whilst there may currently be a lack of protected areas, this does not make the area any less sensitive, and such protected areas can and will be put in place in the future - to safeguard the environment and the income earning potential that they could generate.

Appendix N: Avifauna Impact Assessment

Page 2 of Executive Summary - The bird impact assessment regarding the Blue Crane was based on congregation areas determined by Kotoane (2003) within 1km of the centre line of a corridor were counted – besides the possibility that this data could be outdated, it is of serious concern that the assessments were limited to within 1 km of the centre line of a corridor (one presumes thus a total of 2km, 1 km on either side of the centre line). Given that the route proposals investigated in the DSR are 5km wide, this means that congregation areas within 3 of the 5km seem to effectively have been disregarded. Not only does this mean that the assessments of the numbers of the Blue Crane congregation areas are thus almost certainly flawed, it also means that the sensitivity assessment and resultant conclusions cannot be considered to be accurate either. In addition, congregation points that are nearby but fall outside the 5km corridor area are not taken into account at all, even though the flight paths of these birds would still in all likelihood be directly affected by such proposed power line routes.

A recent study was undertaken by Jessica Shaw of UCT (under the Supervision of Dr. Andrew R. Jenkins and Assoc. Prof. Peter G. Ryan) as part of her Master of Science in Conservation Biology thesis (as yet unpublished) in which field data were gathered on the distribution of Blue Crane collisions on power lines in the Overberg to (amongst other things) provide a first estimate of the scale and biological significance of the Blue Crane power line collision problem in the Overberg. Her field work in the Overberg region was done between September 2008 and January 2009. Of interest are the following segments:

*"On the ground survey, Blue Cranes were the most commonly killed birds found (54% of all carcasses). I used recent carcasses to estimate a Blue Crane collision rate of 0.25 km⁻¹.yr⁻¹ (95% CI 0.10-0.46 km⁻¹.yr⁻¹), corrected for biases, which means that approximately 10% (95% CI 4-18%) of the total Blue Crane population within the Overberg study area is killed annually in power line collisions. While crude, this estimate is extremely high and represents a possibly unsustainable source of unnatural mortality for the Blue Crane. There is urgent need for further research into risk factors and for mitigation measures to be more widely implemented. In addition to Blue Cranes, carcasses of at least 19 other bird species were recovered (including 5 Red-listed or locally endemic taxa), highlighting the wider impacts of power line-induced mortality in the Overberg. After Blue Cranes, Denham's Bustards (*Neotis denhami*) were the most numerous species found with a corrected collision rate of 0.06 km⁻¹.yr⁻¹ (95% CI 0.01-0.12 km⁻¹.yr⁻¹), some 30% (95% CI 6-59%) of the total Overberg population. Such a high level of unnatural mortality is of serious concern for this threatened species."*

and

“Large terrestrial birds were most heavily affected by power line collisions in this Overberg study (Table 2), which is consistent with similar work done in other parts of the world (Janss, 2000). Of the other species found, the numbers of Denham’s Bustard and White Stork carcasses are of the greatest conservation significance. Denham’s Bustard is listed as globally Near Threatened (BirdLife International, 2008b) and nationally Vulnerable (Barnes, 2000). Its estimated annual mortality rate in the study area of 30% through power line collisions is potentially even more worrying than that estimated for Blue Cranes. However, it is a very rough first estimate, with 95% confidence intervals of 6-59%, and a very small sample size. Nevertheless, even at the lower end it is higher than the 0.9-3.6% annual collision mortality calculated for the Great Bustard (Otis tarda) in Spain (Janss and Ferrer, 2000). In South Africa, bustards are known to be susceptible to power line collisions (van Rooyen and Ledger, 1999), with Ludwig’s Bustard (Neotis ludwigii) comprising 45% of all carcasses recovered along transmission lines in the Karoo (Anderson, 2002). There is clearly urgent need for more research into power line mortality suffered by Denham’s Bustard. As for the Blue Crane, this is especially urgent in the Overberg region, which may represent an important area for this threatened species as it declines across the rest of its range (Allan, 2005b).

Over half of White Stork carcasses were found fresh on the second survey to collision hotspots in January, when the density of storks in the Overberg was noticeably higher, suggesting that the migratory population had arrived between the surveys. This high seasonal toll supports findings that utility structures cause significant mortality to this migrant species (van Rooyen and Ledger, 1999). A study in Spain estimated that 1% of the population during post-breeding migration, and 5-7% of the population during winter die on power lines (Garrido and Fernández-Cruz, 2003), indicating that power lines may pose a general threat to White Storks across its range. While the species is not currently considered threatened, this threat may become more significant in light of population and breeding range declines (Anderson, 2005).”

Please also see attached Annexure Cc, which is an article about the high incidence of Blue Crane deaths due to collisions with power lines, which appeared in the 08th May 2009 edition.

Considering the extent of the bird collision problem that clearly already exists in the Overberg, as supported by the data and conclusions in this thesis, adding further multi-line high-voltage power line routes to the equation can only have significant detrimental effects on the avifauna populations in this region, and should therefore not even be considered.

Pages 11 to 14 – Regional Overview and identification of bird micro-habitats

It must be noted that Tesselaarsdal and the adjoining small farms incorporate all of the following habitats listed in this specialist report:

- Fynbos and renosterveld
- Cultivated lands
- Mountains
- Dams, wetlands and rivers
- Other habitats – copses of exotic trees

This not only highlights the diversity of habitats available in this area, but further substantiates the ‘uniqueness’ factor of this community and is indicative of a range of potential conservation and eco-tourism opportunities that this community could employ.

Appendix O: Social Impact Assessment

Had the Tesselaarsdal community been aware of this project during the scoping phase, we would presumably also have been aware of the site visit to the study area by the specialist, undertaken from 5-8 August 2008 (Approach to Study, page 5), and would thus have taken pains to inform him about relevant aspects of this community. As it stands, we do not know if the specialist even visited the Tesselaarsdal area, or if he spoke to anyone here and where he obtained information from, that pertained to this community specifically. We feel that had he made a visit to our area, the dire need for social investment in this community would have been quite clear, his comments and conclusions would have made note of this factor accordingly, and the prospect of further negative impacts due to the proposed high-voltage power lines would have been discouraged without reservation by this specialist.

Page 10 – Western Cape Provincial Spatial Development Framework (WCSDF): the three pillars of sustainable development, also referred to as the “triple bottom line” are –

Ecological integrity

Social justice (people) / human well-being

Economic efficiency

In addition, “The WCSDF identifies tourism as one of the major growth industries in the Western Cape. Minimizing visual impacts and protecting scenic areas are identified as important points to consider with regard to all new development applications in these areas.”

Tesselaarsdal has the need to maintain and protect its multi-faceted ecology, to enhance the well-being of its residents and to improve on the economic efficiency of the area – and it can do all this by means of, amongst other things, heritage and eco-tourism if given half a chance. Quite simply, the siting of multi-line high-voltage power lines anywhere near Tesselaarsdal would go against the very principles and spirit of the WCSDF.

We feel that considerably more attention should have been given to the socio-economic effects of a drop in property values associated with a project of this nature, and the consequences thereof on poor rural communities. [Future investment into the area \(potential property purchasers, small business ventures of either an agricultural or tourism nature etc.\) would most certainly be negatively impacted by the proximity of multiple high-voltage power lines - with the result that possible job opportunities for local residents would also be affected.](#)

There is also the very real concern about the social effects of the influx of the work force on such a project, particularly on poor rural settlements – [for example drug and drink issues, crime, teenage pregnancies etc.](#)

There are also serious security concerns associated with the influx of a work force into the area, given the current prevalence of crime of all kinds throughout our country - farm attacks being one such issue of particular worry in this area, but other factors also feature, such as gang related issues, or opportunistic theft (homes, businesses or livestock).

It is also significant that there would be very few job opportunities for the local residents, either in the construction phase or the maintenance phase of the project, as the work is done by very specialised and skilled teams. Any job opportunities that would be available, would be of a very limited and finite nature.

It is clear that the social impact of a project of this nature would be of a predominantly negative nature, especially when taken in the context that this community is already, for the most part, struggling to survive.

Our view remains that if sufficient information had been gathered regarding the Tesselaarsdal community during the scoping phase, and if the NEMA principles are applied, and the “Sustainable Livelihoods” approach is used, the specialist would have had no choice but to unequivocally recommend that no power line routes should come anywhere near our community.

Appendix P: Heritage Impact Assessment

Page 21 - Impacts & Issues Identification – first paragraph: “... The single biggest concern during this scoping phase must be the potential visual impact of the pylons, transmission lines and associated infrastructure on the cultural landscape and sense of place of the region.”

Given the extensive information and comment made in our TAG response document dated 30th April 2009, regarding the history & heritage of the Tesselaarsdal community, the proposed multi-line high-voltage power lines would have a significant negative visual impact on our cultural landscape and sense of place, particularly when taken in the context of our community’s potential to make use of its assets for heritage- and eco-tourism in the future. We remain extremely concerned that the specialist did not make a stronger and absolute recommendation that Tesselaarsdal in its entirety, including its access roads, should be avoided completely by such power line routes.

Appendix Q: Visual Impact Assessment

In further substantiation of this specialist's recommendation, given in no uncertain terms, that the Alternative 1 and 2 routes of the power lines should not go through our valley, herewith some additional points to consider:

Page 22 to 25 – of the seven landscape types that this specialist defined in his report, five of these can be applied to various areas in, and in the immediate vicinity, of Tesselaarsdal / Farm 811 and the adjoining small farms. They are mountain landscape, foothills, open valley landscape, contained valley landscape and undulating & open landscape.

Page 29 - Visual Impact and Issues Identification – Point 4: agricultural farmsteads should not be visually impacted. Both the Alternative 1 and 2 routes would impact on a number of agricultural farmsteads in the Tesselaarsdal area - in fact any routes traversing the area shown on the map at the beginning of this document, would impact on agricultural farmsteads – this is after all, a significant portion of the 'bread basket' farming area of the region.

Page 30 - Visual Impact and Issues Identification – Points 8 and 9: Similar to the issues raised in these points, Tesselaarsdal also has:

- "...a high landscape character and nature sense of place" and power lines crossing our access roads would also be "...prominent and create high levels of intrusion." (point 8)
- "...high levels of landscape character which currently has no dominating landscape modification." (point 9)

Tesselaarsdal's setting nestles between the northern slopes of the Kleinriviersberge and the southern slopes of the Steenboksberg. Access roads are gravel roads – from the west (Hermanus – Shaws Pass), from the north (Caledon) and from the east (direction Kleyn Wolve Gat – Stanford/Napier road). Within Tesselaarsdal / Farm 811, the northern and western access roads meet, running east-west through Solitaire. From this road, a road branches off on the western side and ascends the foothills, and ends up approaching Tesselaarsdal village from the west. Another road branches off the Solitaire road on the eastern side of Farm 811 and approaches Tesselaarsdal village from the north. The road through Tesselaarsdal village leads to Bethoskloof, and then makes a circular route to rejoin this northern access road some 2km north east of Tesselaarsdal village.

The approach road to Tesselaarsdal from Caledon has immense vistas of the agricultural landscape, as well as the Steenboksberg and the Kleinriviersberge the nearer one gets to Tesselaarsdal. Multiple high-voltage power lines along the Alternative 2 and ABI route in this area will in fact be in direct line of sight across the entire agricultural vista as one travels towards Dunghye Park, and will become increasingly visible and intrusive along the entire approach road to Tesselaarsdal. They will be extremely close-by once one reaches and passes Dunghye Park, and will be a most obvious and marring feature of the landscape as one crests the rise on the north eastern side of Farm 811. The Alternative 1 route would also be in constant sight from this approach road, as they run along the northern slopes of the Steenboksberg, in close proximity to the various farm homesteads and buildings on the lower slopes, and these lines would become ever closer as one nears Dunghye Park. Once one is on the final approach to Tesselaarsdal, any one of these line routes would be central to one's line of site, marring the entire mountain and foothills vista within which our community nestles, and all of these routes would actually cross one or more of the approach roads (the ABI route, for instance, would cross the western approach road to Tesselaarsdal village, the Solitaire approach road and the approach road from Caledon near Dunghye Park).

The visual impact of the multiple high-voltage power lines from the western approach road (from Hermanus - Shaws Pass side) would also be significant, as these lines would traverse the view of the entire valley as seen from the approach to Solitaire; an even more significant visual impact would be from the road that accesses Tesselaarsdal village on the western side (from Solitaire), as this road steadily climbs the foothills, and offers elevated vistas of the northern and eastern portions of Tesselaarsdal and beyond.

The eastern approach road to Tesselaarsdal (from the Kleyn Wolve Gat side) again offers immense vistas of the agricultural landscape, from the Kleinriviersberge on the left, down to the Hemel & Aarde valley / Babilonstoren, the Steenboksberg, across to Caledon, the Klein Swartberg and beyond

to the Riviersonderend mountains. The routes, Alternatives 1, 2 and the ABI route, would be significant marring features that would be visible across this vista as one approaches Tesselaarsdal from this direction, and would become increasingly obvious and intrusive the nearer one gets, before finally crossing this road.

In some instances the various access roads offer sweeping 360° views, which means that any power line route would be visible and obvious, no matter which way you looked.

3. General comments / issues of concern

- The Alternative 1, 2 and ABI routes seem to aim specifically for Tesselaarsdal – it is patently obvious from the maps that there is a property densification here, and yet the routes were still drawn to go right over us. There is something very wrong with the process of drawing up such routes if this has been allowed to go into the EIA process without the necessary adjustment being done to consciously avoid an area which logically will have a larger number of people living there, in comparison to the surrounding properties.

- Met moderne produksie tegnieke kan organiese boerdery op swakker grond suksesvol beoefen word, byvoorbeeld deur kompos en ou strooi te gebruik kan jy selfs klei-grond wat 'n gedeelte van Tesselaarsdal se grond verteenwoordig, vir klein spesialis- of oorlewingsboerdery, toeganklik maak.

In die gedeelte oor grondgebruik en die geskiktheid van grond vir sekere grondgebruike (*land use and land capability*) sê hulle ons grond is swakker en nie hoë potensiaal landbou grond nie, maar bogenoemde punt wys dat dit nie eintlik relevant is nie. Hier verwys ek veral na die grond wat op die oomblik in onbruik is. Die impak van die beskikbaarheid van water kan deur drupbesproeiing en *hydroponics* verlig word, dit het 'n geweldige impak op die toekomstige potensiaal van Tesselaarsdal - as gevolg van druk in die Kaapse-metropool om die groente verbouende Phillippi gebied al meer te gebruik vir behuising en dorpsvestiging, gaan Tesselaarsdal en die Overberg binnekort die voedselspens van die Kaapse-metropool word, want daar gaan nie meer genoeg grond oor wees vir dié doel, aan die Kaapse kant van die berg nie.

As die krag in die metropool benodig word en nie hier nie, hoekom dan die kragcentrales versprei om sogenaamd die Netwerk (*grid*) te balanseer, met die gepaardgaande enorme negatiewe impak op ons internasionaal-belangerike en sensetiewe omgewing? Hoekom rig hulle dan nie alle kragcentrales by Koeberg op nie, dan is dit mos by die plek waar die krag benodig word en is die verlies as gevolg van die beweging deur die kragnetwerk wat hulle voorgooi, mos minimaal.

Ons gemeenskap moet aandrang op gesamentlike besluitneming (*joint decision-making*) oor die aangeleentheid, ons wil nie net gekonsulteer word nie.

Grond in Tesselaarsdal se mense se pensioen in die toekoms, deur waarde-groei en later miskien vir spesialis boerdery of om dit te verkoop. Dit is "*land for agrarian use*". Veral die mense wat nie top werke het buite Tesselaarsdal nie, kan net ekonomiese bates vermeerder deur a) gebruik te maak van hul grond, en b) die ekonomiese ontwikkeling van Tesselaarsdal wat as gevolg van sy uniekheid gesumileer word, deur invloei van buite kapitaal, soos bv. eko- en erfenis-toerisme. Die hoogspanningslyne sal die sosiale samehorigheidsgevoel van Tesselaarsdal vernietig (*The lines will destroy the social cohesion of Tesselaarsdal*).

Verdere punte wat ek dink betrekking het tot Tesselaarsdal i.v.m. landbou is dat dit die volgende voorsien:

1. Huishoudelike voedsel sekuriteit
2. Inkomste-generering, met gevolglike rykdom-skepping
3. Sosiale-inklusiwiteit - as vrouens kos produseer, is hulle status in die gemeenskap hoër
4. Handhawing en beskerming van die omgewing bv herwinning vir die maak van kompos
5. 'n Meer samehorige (*resilient*) gemeenskap
6. Werk-skepping

- In the 'Issues / Comments' section of the DSR regarding fire hazards, Eskom repeatedly maintains that it has "fire management programmes which can be tailored to address these issues", however no mention is made of the acceptance of liability in the event of a fire being caused by the 'sparking' or 'shorting' of a line, which then spreads from the Eskom servitude to the land owner's property. There have been instances in the past, where fires were caused due to 'sparking' or 'shorting' as a result of lack of maintenance, the ageing of the lines and/or corrosive build-up due to sea air, not to mention lightning – this calls into question Eskom's ability to maintain the power lines and apply their fire management programmes. In addition, the current fire regulations put the onus on land owners to make fire protection arrangements for their properties - the proximity of high voltage power lines will result in further loss of useable land as additional fire breaks are required, this will be an additional cost factor for the land owner (to create and maintain the firebreaks), and it will result in higher fire insurance costs for the land owner – all due to something which is not of the land owner's doing, and in all likelihood was not planned or costed for when the property was bought/taken into use.
- **Additional Specialist Reports**
 We would like to insist that the following additional Specialist reports be done by independent experts, and that scoping reports for these topics be included in the Draft Scoping Report, so that the conclusions of these additional reports can be factored into the overall sensitivity mapping exercise of the proposed high-voltage power line routes:
Tourism and Eco-tourism, including the future potential/growth aspect thereof, as this is such a fundamental industry to the entire region under investigation.
Underground and undersea high voltage power lines – investigation of all aspects, ranging from detailed terrain analysis, construction, site rehabilitation, health matters, feasibility aspects etc.
Risk Assessments – including (but not limited to) the issue of electro-magnetic fields (EMF's) associated with power lines and their effect, **not only on the health of humans and animals, but also on food products (grains crops, fruit, vegetables, vines etc.) produced in this "bread basket" region, and water sources;** fire and fire management, including lightning issues associated with power line towers and lines; property security and the influx of workers etc.

It has been indicated that two additional specialist reports have been undertaken, namely one for wetlands and one for environmental resource economics. However, neither of these reports, nor their conclusions, have been included in the DSR sensitivity mapping that has been done for the other specialist reports. Once again, we contend that by not including these analyses and their conclusions in the scoping phase, the assessment of all the proposed routes is incomplete, and thus the conclusions drawn by the DSR in its current form are substantively flawed. **This additional information would serve to provide a fair indication of where route adjustments will be needed, and the detailed EIA phase can then commence with a more accurate database. This view is supported in the conclusion of the Flora Impact Assessment Appendix L, in which the specialist indicated that route adjustments must be made prior to the commencement of the detailed EIA phase, otherwise "...the final negative impacts are likely to be significant."** By the same token, the additional specialist reports that we have requested should also be included in the scoping phase, in order to factor into the sensitivity mapping exercise.

- We also contend that the number of proposed routes going forward into the detailed EIA phase should not be reduced, but that all four routes should be analysed and assessed – firstly, because the scoping phase specialist reports are predominantly of a desktop nature, and there is a good chance that significant "on the ground" issues have been overlooked that could affect the final sensitivity analysis of each of the routes (again, Tesselaarsdal being a case in point), and secondly because it has been acknowledged that this entire region is considered to be highly sensitive, and as such it deserves to have every aspect of every route analysed carefully and in detail before **any** conclusion is made about whether there is in fact a 'preferred' route, or not.

4. Conclusion

Given that our Tesselaarsdal area has been rated as highly sensitive by the visual, flora, fauna, avifauna, and heritage specialist reports, and considering the relevant social and land use aspects which we have tried to highlight in this document, our contention is that no power lines can be routed anywhere near Tesselaarsdal. In essence, Tesselaarsdal is treasure chest of opportunities that needs to be opened, not destroyed or limited by the injudicious routing of multiple high-voltage power lines over or nearby this community.

It remains our contention that the scoping process is substantively flawed due to the fact that:

- a. Not all the directly affected parties were informed about this proposed project and given a chance to participate in the scoping phase – our community being a case in point, and
- b. The scoping phase specialist assessments are predominantly of a desktop nature, and yet they have been used to draw conclusions and reduce the number of routes that will be assessed in the detailed EIA phase, and
- c. The additional specialist reports have not been included in the sensitivity analysis, although these might have significantly altered the sensitivity ratings of the various routes.

At the very least, all four routes should go through to the detailed EIA phase, so that all relevant issues can be considered and analysed, in order for accurate conclusions to be drawn regarding the possibility of a preferred route.

We further request that the additional specialist studies that we have requested in this (and the previous) document be done before the finalisation of the Scoping Report, so that the conclusions of these reports can be included in the DSR sensitivity analysis of each route proposal.

In order to rectify the above-mentioned shortcomings, we strongly suggest that the extension of the public participation process and the postponement of the finalisation of the DSR until **at least** August 2009, be granted, so that the DSR can be adjusted accordingly to include more relevant and pertinent information – after all, more information, and correct information, can only stand the entire EIA process going forward in good stead.

Considering the extreme sensitivity of our unique region in all respects, and the groundswell of objections that have arisen from individuals, land-owner-, environmental- and tourism groups based in the greater Overberg / Overstrand region, we feel strongly that this EIA process should eventually find that the proposed high-voltage transmission lines from Bantamsklip can only be given an emphatic 'NO GO' assessment.

5. Annexures

Aa - TAG membership list as at 22nd May 2009

Bb - Hermanus Times article 08th May 2009 – Fynbos and business

Bb - Overberg News/Nuus article April/May 2009 – Fynbos: conservation, business & work creation

Cc - Hermanus Times article 08th May 2009 – Blue Crane deaths due to power line collisions

Yours sincerely,

TAG Steering Committee

Johnvin Hendricks, Joy Paulsen, Kobus Visser, Katrin Pobantz & Vincent Cook (co-opted)