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05 August 2015

Our Ref: J27035  
Your Ref: Email received 06 August 2011

Email: [laura.cloete@aexp.com](mailto:laura.cloete@aexp.com)

Dear Ms Nixon

**RE: ESKOM EIA CONCERNS FOR THE PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE (DEA Ref. No: 12/12/20/944)**

OBJECTION TO THYSPUNT WESTERN ACCESS ALTERNATIVES

(SPECIFICALLY W1, W2 AND W3)

OBJECTION TO THE LOSS OF THE 10 KM PROTECTION ZONE

**Comment 1:**

I wish to lodge an objection to the W1, W2 and W3 access routes, each of which will pass directly between Umzamowethu and Oyster Bay, separating the two villages with devastating impact. Negative impacts include:

- the 'apartheid' implications of separating the two quiet villages so decisively by cutting access to work, shop, beaches, etc with a dangerously busy road;
- the very real problems of building an overpass (elderly cannot reach the one shop they need) and underpass (muggings and drug use)
- the equally real danger of people short-cutting across the road or falling out of pubs and stumbling across the road, which will be life-threatening;
- the noise and pollution of "hundreds of vehicles" (to quote your report) using a route that would pass very near to a crèche, churches, pubs, schools and houses;
- total destruction of the area's gentle other-world ambience wrought by a busy tarred access road through the heart of two quiet villages;
- likely economic ruin of our one local shop that relies largely on Umzamowethu support to survive and of the tourism industry that is so necessary to the community;
- a growth in squatting and other hazardous social issues (increased crime, overcrowding, fire hazards, pollution, health issues, etc) as outsiders looking for work squat in Umzamowethu, the nearest village to the gates of the site.

The stated aim to provide transport only from Humansdorp will surely fail as, if the nuclear project aims to hire local people, they will have to stop at Umzamowethu to collect workers who cannot be



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expected to relocate to Humansdorp when they live virtually on-site. However our villages have absolutely no infrastructure to support this - insufficient sewage, no hospital or clinic, no fire station, no police station, water shortages, etc. So the area will grow unrestrictedly and dangerously and the calm, peaceful, harmonious lifestyle of those who choose to live there will be forever destroyed.

This route is particularly galling when you clearly have another route (W4, the blue route) nearby which would serve the nuclear site as well without destroying our villages so totally. And now that you have also radically reduced the 10 km protection zone so that our villages are no longer restricted from further growth, it is clear you have abandoned any attempt to protect or mitigate the destruction of our villages.

Please can you clarify:

- a) why does your report not address the negative impact of any route that cuts between our two villages?
- b) why does your report not address the negative impact on our villages if there is no protection zone?
- c) does your report actually carry any weight and is Eskom bound to apply your recommendations or is it just window-dressing?

Please clarify your position on the above as a matter of urgency as our residents cannot understand the purpose of your research when it so blatantly excludes such necessary research.

#### **Response 1:**

Your comments and concerns are acknowledged and noted. As result of public meetings held in particular in Oyster Bay on 30 May 2011, Humansdorp on 02 June 2011 and St. Francis Bay on 31 May 2011; as well as comments received from Interested and Affected Parties such as yourselves both at the public meetings and as part of the Public Participation process for the Revised Draft EIR Version 1 it came to light that the alternatives for access roads past the town of Sea Vista/ St. Francis Bay and the settlements of Umzamawethu/ Oyster Bay to the Thyspunt site need to be re-investigated. A follow-up investigation has therefore been conducted by the following specialists in order to undertake a comparative assessment of road alternatives W1 to W4:

- Social Impact Assessment;
- Noise;
- Botany;
- Dune geomorphology;
- Freshwater ecology (wetlands);
- Vertebrate fauna;
- Invertebrate fauna; and
- Heritage.

A combined Addendum Report has been produced (Appendix E31 of the Revised Draft EIR Version 2) and is available to the public for comment and review. The conclusion of this report is that the Western Access Road must follow an alignment east of Umzamowethu.

As indicated in the Revised Draft EIR Version 1, one of the assumptions of the Nuclear-1 EIA process is that the Emergency Planning Zones of the European Utility Requirements (EUR) will apply to the Nuclear-1 power station. These zones are a maximum of 3 km and hence, no restrictions would apply to Oyster Bay (as you also indicated in your comments). Private development is only restricted within the inner (smaller) Protective Action Zone (PAZ), which in the case of Koeberg Nuclear Power Station (KNPS) is 5km. The 16 km UPZ imposes evacuation planning restrictions but does not prevent private development.

All impacts, whether they be on the social, economic or biophysical were assessed in terms of their significance in the context of these assumptions.

All recommendations of the Final EIR will be incorporated in the Environmental Management Plan, which is a document with legal standing and is required to be implemented by Eskom and its appointed contractors and staff on site during the construction, operation and decommissioning

phases of the nuclear power station. The recommendations will also be included as conditions of an Environmental Authorisation but this would be done at the discretion of the Competent Authority, the Department of Environmental Affairs.

RESPONSE FROM THE INDEPENDENT NUCLEAR SPECIALIST

This seems to be largely an environmental impact issue as opposed to nuclear or radiological save for the emergency planning assumptions which are the design base assumptions.

Yours faithfully  
for GIBB (Pty) Ltd

A handwritten signature in black ink, appearing to be a stylized 'E' or similar character, located below the typed name.

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The Nuclear-1 EIA Team