

5 August 2015

Our Ref: J31314  
Your Ref: GC WEBB/jl

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Dear Mr Webb

**RESPONSE TO MR GC WEBB, ATTORNEYS HUTTON & COOK, MASCADOR (PTY) LTD.**

**YOUR REF: COMMENTS ON REVISED DRAFT ENVIRONMENTAL IMPACT REPORT AS COMPLETED BY ATTORNEYS HUTTON & COOK, MASCADOR (PTY) LTD**

**Comment 1:**

The directors of Mascador are partners in firm of Attorneys Hutton and Cook whose Humansdorp offices are established at the said property. As such, the revised draft EIR identifying Saffrey Street as the route for heavy vehicles through Humansdorp results in our company, partnership and its individual partners being directly affected thereby.

**Response 1:**

Similar concerns from the public around Humansdorp area up to St Francis have been raised and acknowledged. It is for these reasons why the Transport Assessment is being revised to consider other alternative routes. The current report recommends that the main street through Humansdorp and Saffrey street be bypassed. The recommendation is to tap off from Voortrekker road (R102) from Humansdorp enroute to Jeffreysbay between Nico Malan street and the Boskloof suburb. Any substantive changes to the Transportation Assessment and the Revised Draft EIR will be made available for public review and comments. A further bypass of Humansdorp for traffic from the N2 is proposed to link the R330 north of Humansdorp with Old Cape Road (the R102) west of Humansdorp (between Humansdorp and Kruisfontein). This bypass would extend north and west of the Humansdorp industrial area.

**Comment 2:**

To suggest Saffrey Street as a viable alternative to the Humansdorp Main Street is nothing short of ludicrous.

**Response 2:**

Your comment is noted and has been passed on to the traffic and transportation specialist for consideration in their revised report.

**Comment 3:**

Saffrey Street does not constitute an access route “around Humansdorp” as suggested by the Environmental consultants. The proposed alternative route through Humansdorp still entails vehicles travelling through the centre of Humansdorp simply via a different route.

The fact is that the said route via Saffrey Street passes through commercial and residential area bisecting the town from East to West and basically still the centre of the town just not the main street!

No consideration at all has been given to the fact that the said route passes in close proximity to a hospital, ambulance yard and two schools (one on either side of Saffrey Street).

No consideration whatsoever has been given to the negative impact such route would have on businesses and residents established in Voortrekker Road and Saffrey Street, Humansdorp.

No consideration has been given to the amount of pedestrians crossing the said route from the two school and from Kwa Nomzama Township whose resident cross the proposed route in two areas (Saffrey Street and the R330) - this being their only access route into Humansdorp.

I record that my company’s property (Erf 80, Humansdorp) has a driveway onto Saffrey Street and during peak traffic there is already massive congestion with vehicles having stopped to enter Voortrekker Road blocking the driveway of our property as also those below in Saffrey Street so preventing exit from our property. The proposed route with increased traffic flow would make it virtually impossible for us, the business and residents of Saffrey Street to exit or enter our properties.

No regard has been had whatsoever for the rights of the residents and businesses in Saffrey Street considering that heavy vehicles would upon entering Saffrey Street be travelling down a very steep gradient hereby certainly increasing noise levels significantly. Clearly an inspection of Saffrey Street, Humansdorp would show the very poor surface conditions and a serious upgrade of the road would be necessary to include widening of the road and removal of existing established trees to the detriment of all.

Clearly the increased traffic flow, noise levels and construction will negatively impact upon our use and enjoyment and business conducted from Erf 80, Humansdorp. We object strongly to the proposed route.

At a public meeting held on 31 of May 2011 at St. Francis Bay a proposal was made by Mr. Hilton Thorpe to the effect that any access road to Thyspunt should bypass any town completely by at least 1 kilometre. We support such proposal.

**Response 3:**

Your comments and concerns are noted. Please note the options in terms of the access of the Thyspunt site to bypass the town of Humansdorp are currently underway, as per response 2 above. Any substantive changes to the Transportation Assessment and the Revised Draft EIR Version 2 will be made available for public review and comments.

**Comment 4:**

Insofar as further comment is invited the following is recorded. I, the undersigned (Garth Cameron Webb) practice as an attorney from Erf 80, Humansdorp and reside at 5 Rivertide, St. Francis Bay. I travel the R330 from Rivertide (approximately 1 kilometre from the Krommeriver Bridge) to Humansdorp and back on a daily basis.

Rivertide comprises of 69 residential units of which of the majority are holiday homes. The entrance from the R330 to Rivertide is already extremely dangerous with taxis stopping to load and off load passengers. Severe traffic congestion occurs during peak periods which have already resulted in a number of traffic accidents. I have personally addressed numerous correspondences to the South African National Roads Agency and in fact met with officials of the said agency at the intersection pertaining to the dangers at the intersection. This has not been adequately addressed and the same applies at numerous other intersections to developments off the R330.

**Response 4:**

Your comment is noted. Kindly refer to Response 3 provided above.

**Comment 5:**

Having attended at the public participation meeting at St. Francis Bay on the 31<sup>st</sup> of May it is noted that the consultant's mandate in preparing the revised draft EIR report appears to be *inter alia* to make a recommendation on which site of a possible three, being Duynfontein, Thyspunt or Bantamsklip should be the preferred site for the establishment of Nuclear-1. The one common factor of the three proposed sites is that Eskom own the land.

It is however abundantly clear that none of the three sites are ideal for the establishment of a nuclear facility. In formulating a comparative assessment of the three alternative sites and giving consideration to the admitted 259 impacts filtered to 16, the exercise was clearly restricted to a comparative assessment between three alternative sites identified by Eskom as the owners of the property in question. Each of the sites showed negative impacts in more than one category. On their own admission the consultant embarked on a weighted numerical comparison of the alternative sites in an attempt to identify the most suitable site for Nuclear-1. **With respect, the environmental impact assessment should have at its focus the suitability of a particular site for the establishment of a Nuclear reactor and not focus on a comparison of three particular sites; ownership of which vests in Eskom so as to be established which of the three is most suitable. The simple procurement of a site by Eskom does not establish viability!** It is, for the above

reasons, respectfully submitted that the revised EIA is fatally flawed. Thyspunt according to the consultants may **in their opinion** be the preferred site of the three – this does not mean that it is a suitable site for a Nuclear Power Station! This is clearly apparent from their own report.

**Response 5:**

Your comments are noted and the current application for environmental authorisation is indeed an evaluation of the significance of the impacts related to the construction and operation of a nuclear power station on three very specific sites. The methodology for assessment was approved by the Department of Environmental Affairs during the Scoping Phase. However, it should be borne in mind that the choice of the original five and later three sites are based on the Nuclear Site Investigation Programme (NSIP) study undertaken by independent consultants during the 1980s., This was commissioned by Eskom and aimed at identifying the most suitable sites for location of nuclear power stations in South Africa. The NSIP included a wide range of specialist studies, such as engineering, social science, geology, ecology and town planning.

The primary objective of the NSIP was to identify sites along the coastline of South Africa, suitable for the construction and operation of future nuclear power stations. The NSIP comprised of three phases: Phases 1 and 2 involved desktop studies, which assessed the general suitability of regions located along the coast. Subsequent to this, specific sites within the identified regions were earmarked for further detailed investigations. Phase 3 involved field investigations of those sites, identified during the preceding phases, by various specialists. Field investigations were undertaken in order to determine the suitability and sensitivity of the sites identified and culminated in the identification of five feasible and suitable sites.

GIBB, as the independent environmental consultant, reviewed the NSIP process. Within the context of the EIA process, GIBB's responsibility is to determine whether the proposed alternatives are reasonable and feasible sites. All three sites were considered reasonable and feasible at the time that the Revised Draft EIR was provided for public comment.

Therefore despite these sites being owned by Eskom, the EIA process has confirmed that they fulfil requirements in terms of technical suitability and position in relation to current and future electricity demand.

Yours faithfully



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For GIBB (Pty) Ltd  
The Nuclear-1 EIA Team