

05 August 2015

Our Ref: J31314

Your Ref: Email received 07 August 2011

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Dear Elspeth Ivey

RE: ESKOM EIA CONCERNS FOR THE PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE (DEA Ref. No: 12/12/20/944)**Comment 1:****COMMENTS ON THE REVISED DRAFT ENVIRONMENTAL IMPACT REPORT** (*Please refer to page numbers where possible*)**1** *My comments refer to the Bantamsklip site because the HLPOA lies within 50 km of the site.*

I understand that the Bantamsklip site is the least preferred because of the high costs to ESKOM

(Page 11). In addition to high costs being a reason for rejecting Bantamsklip, further environmental aspects and economic impact on the Overberg should be considered for future planning.

Response 1:

Your comments are noted.

It is acknowledged in the Revised Draft EIR that the potential cumulative environmental impacts of the proposed power station and the transmission lines will be significant.

With regards to the economic impact of the Bantamsklip site in relation to the other alternative sites, it is stated in the Economic Impact Assessment that this site will be several billion Rand more expensive than the other sites, due to the additional expenses associated with transport of materials to Bantamsklip.

Comment 2:

Page 2 Brazil and Schulpfontein were excluded from consideration in the EIA because of "limited local demand and the lack of existing electricity transmission corridors associated with these sites". Bantamsklip is sited at the southernmost tip of South Africa and therefore, apart from being isolated, it is the furthest point from demand for electricity. The key sources of income in the Overberg are farming, fishing and tourism. Hermanus, Gansbaai and Kleinmond have been identified for light industry. The local demand for electricity is therefore minimal and the power produced at Bantamsklip will be for use in regions distant from the site. The impact of transmission lines has not been discussed in this EIA but it is not possible to separate the power station from the transmission lines –

the transmission and distribution lines will have a extremely negative impact on farming and tourism and if they are rejected in a separate EIA, Nuclear1 at Bantamsklip will be useless. This is a further reason for rejecting the proposed nuclear power station at Bantamsklip.

Response 2:

Your comment is noted. As indicated in Response 1, it is expected that the potential cumulative impacts of the power station and transmission lines at Bantamsklip would be significant.

Comment 3:

Page 7 Location of the sites – Impacts on Flora. Impacts on flora I quote from the Botanical Society's series of Wild Flower guides - Southern Overberg, S African Wild Flower Guide 8 *"Like most areas of the Cape Floristic Region, the southern Overberg has a rich flora....Rare and endemic species are often clustered in so-called hotspots. One such hot-spot is the Groot Hagelkraal area near Pearly Beach----such a concentration of endemic plants is without parallel, not only elsewhere in the Cape Floristic Region, but in the world."*

Fire is a key ecological process for the healthy survival of most plant communities. It is unlikely fires will be permitted in the region of the nuclear station therefore the impact of the proposed nuclear station will not be only on the 31ha but on the surrounding communities.

For the same reason search and rescue and the relocation of rare plant species is rarely successful because fynbos needs fire and wind and is very sensitive to soils, gradients and nutrients in the soils. The proposed mitigation measures may well fail.

Response 3:

Your comments are noted.

The wider area is indeed recognised as being sensitive in terms of botanical biodiversity. A comprehensive study of the vegetation of the site was carried out (Appendix E11) and it was found that the majority of the site does not have highly sensitive flora, but that there are pockets of limestone fynbos that have high botanical sensitivity. These pockets are one a number of sensitive features that have been avoided in the recommended position of the proposed power station.

Planned fire control burns are part of the present EMP for the three sites and will be used as a management tool in future as part of conserving the natural vegetation. The fact that Eskom will have a nuclear plant on the property does not stop this controlled burning process, However, they need to ensure that they have certain mitigation factors in place before burning close to a nuclear plant. In this case, wind direction as an example , plays a crucial role.

Comment 4:

Page 8 Oceanographic impacts The sea and coastline at the Southern tip of Africa is notoriously stormy and dangerous and will make the building of any infrastructure or mitigation measures costly and difficult. High winds and strong currents are experienced.

Response 4:

Your comment is noted. A comprehensive oceanographic assessment was included in the Nuclear-1 EIA (Appendix E16 of the Revised Draft EIR) and it was found that the construction of a nuclear power station would be technically feasible.

Comment 5:

Page 10 Tourism impacts Income is derived from tourism, farming and fishing. Whale watching, shark diving, and the flora kingdom are all key components in attracting tourists. Added to these components is the spectacular scenery, mountains and sea, of this region. This area provides unique experiences not found elsewhere in the world and although mitigating measures are proposed the negative impact of Nuclear1 cannot be underestimated. Tourism provides employment at many different levels and is an economic benefit to the local community. International tourism to this area has a benefit to greater South Africa because tourists will travel to other areas in the nation from the Overberg. There will be a national, provincial and local sustainable economic benefit from the tourists, particularly overseas tourists, which cannot be provided by employees at Nuclear1 either in the construction or maintenance phases.

Page 10 Impact on transportation systems

It is stated that Bantamsklip has a significant impact on the transport network with upgrades required to the public transport system, heavy load routes and road upgrades required for emergency evacuation purposes. Due to the Bantamsklip site's isolated location, transporting heavy loads by road will require significant infrastructure upgrades, which will have a high financial cost. We are particularly affected by this aspect because all the properties of the HLPOA adjoin the R43 which is a major route from Cape Town via Hermanus to Bantamsklip. Not only are we personally affected but the R43 is a major scenic route passing through important fynbos flora and beautiful scenery. The impact of necessary road works will have an extremely negative impact on the environment and again on tourism in the Overberg.

Response 5:

Your comments regarding tourism around the Bantamsklip site are noted. Due to the currently small size of the tourism market in the Bantamsklip area, the Tourism Impact Assessment (Appendix E22 of the Revised Draft EIR) concluded that business tourism associated with the construction and operational phases of Nuclear-1 has the potential to increase tourism income in the affected area by 5% and 8.5% during the construction and operational phases respectively.

Your comments regarding transportation systems around the Bantamsklip site and the potential impacts on the HLPOA are noted.

Comment 6:

Page 14 The findings conclude that there are no environmental fatal flaws that should prevent the proposed project from proceeding at any of the alternative sites, provided that the recommended mitigation and management measures are implemented. No mention of the cost of these measures is given. When cost is considered mitigation measures are frequently minimised with negative impact. Monitoring and controlling mitigation measures is also costly and there is no guarantee this will take place.

Response 6:

When environmental authorities authorise developments such as these, authorisations are issued subject to strict adherence to mitigation measures. These authorities may also impose stricter conditions than are recommended in the Environmental Impact Report and Environmental Management Plan (EMP).

It has been recommended that an Environmental Management Committee (EMC) should be appointed to monitor the implementation of the EMP during construction of the power station. The EMC will report directly to the environmental authority and have representation from local residents. In addition to this, it is customary for large projects such as this to be authorised subject to the appointment of an independent Environmental Control Officer, who reports to the authority. The environmental authority has the authority to stop construction in the event of the mitigation measures not being adhered to.

Comment 7:

Page 11 It is stated that the Bantamsklip alternative would be costly because its location would require longer and larger transmission lines than either of the other two sites (900 km of combined 765 kV and 400 kV transmission lines at Bantamsklip vs. 500 km and 190 km of 400 kV lines at Thyspunt and Duynefontein respectively). The road and bridge upgrades that would have to take place to transport extra heavy loads from Cape Town harbour to Bantamsklip also contribute to the high costs of this site. The Bantamsklip alternative would be R 8 billion less costs effective than either of the other two sites. Mention is made of distance but no mention is made here of mountains and rivers and the impact on farming and the natural environment and in particular the important and world unique floristic kingdom.

The possible benefits of the conservation of the northern portion of the site should not be seen in isolation to the environment as a whole.

Response 7:

Your comment is noted. The impact on mountains and rivers are not directly considered in the Nuclear-1 EIA because they will be impacted by the transmission lines. The transmission lines are the subject of a separate EIA process. However, the cumulative impacts of the transmission lines and the power station are considered at a strategic level.

Comment 8:

2. **Any other Comments:**

We are grateful and appreciate the fact that, for the reasons of cost, Bantamsklip has been removed as alternative site for Nuclear1,

We further recommend that it be rated a “no-go” alternative for the reasons given in the comment sheet. The negative impact on farming, fishing and tourism in the Overberg will outweigh any positive benefit that the shortterm (9 years) construction phase will bring to the region.

Thank you for this opportunity to comment on the Revised Draft Environmental Impact Assessment Report for the Eskom Nuclear Power Station and Associated Infrastructure (Nuclear-1)

Response 8:

Your comment is noted.

Yours faithfully



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