

05 August 2015

Our Ref: J27035
Your Ref: Email received 19 August 2011

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Dear Mr Clause

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

We would like to thank you for extending the period in which we as St Francis Links may submit comments as it relates to Nuclear-1.

St Francis Links (SFL) is registered as an Interested and Affected Party. We have not previously tendered any written comments on the proposed Nuclear Power Station at Thyspunt, but would like to table the following matters of concern for consideration and possible inclusion in your Issues and Response Report. For purposes of this letter and the concerns raised in it, "SFL" shall represent the three entities involved at St Francis Links namely The St Francis Links Home Owners Association, Links Golf Club Limited and St Francis Golf Links (Pty) Ltd.

Whilst SFL recognises the urgent demand for power in South Africa, our concerns lie with the direct impact which the proposed Nuclear Power Station might have on our estate, our home owners and our community and apply purely to us as the largest landowners and developers in St Francis Bay.

We therefore submit as follows:

Comment 1:

1. Access Road – R330

- 1.1 The R330 road between Humansdorp and Cape St Francis passes by our front entrance gates. The SFL developers funded the building of the traffic circle and the SFL Home Owners Association maintains it at our cost. We understand that the possibility is there that the abnormal loads (amongst others) during the construction period would utilise this route, past our entrance gate. Our concern is what plans will be set in place to upgrade / protect this road and how this might affect the traffic circle, lighting of this area (which we also maintain), security in this area and very importantly the water run-off and drainage systems supporting the road (given how it was affected by the November 2007 floods).

- 1.2 St Francis Bay, like many towns in South Africa, struggles with security and criminal activity. It has long been suggested that surveillance of the only entrance and exit to the town (in the region of the Sand River area), might lessen crime in the area. We would also like to suggest that your client, as a goodwill community contribution, considers the installation of security surveillance cameras at the entrance to St Francis Bay, and more specifically in this high-traffic area at the circle. SFL would offer our services in the monitoring of the cameras installed as such, by way of our security team at our front entrance gate.

Response 1:

Impact on the R330

Since the release of the Revised Draft EIR, the The Transport Impact Assessment (TIA) has been substantially revised so that construction traffic will avoid Humansdorp and St. Francis completely (with the exception of less than 30 extra heavy loads that will have to use the Eastern Access Road to the Nuclear-1 site over the 9 year construction period). The revised TIA recommends the construction of a new interchange on the N2 to the west of Humansdorp that will bring construction traffic to the site via the Oyster Bay road and the Western Access Road to the Nuclear-1 site. In terms of the revised TIA, only personnel traffic would use the R330.

There is the potential that changes are required to the circle. If this is the case Eskom would be required to engage with the local authorities and yourselves during the planning stages.

Security surveillance

Social infrastructural issues e.g. crime requires further discussions with local authorities, communities and entities such as yourselves. In the case of other Eskom projects Eskom engaged with the South African Police and other relevant stakeholders to ensure that security issues are addressed. The specific detail regarding camera's would need to be discussed further with Eskom.

Comment 2:

2. Kouga Municipality (KM)

SFL is concerned about KM's current ability to deliver its services in the town of St Francis Bay. It is evident from recent events that KM cannot cope, financially or otherwise, with maintaining this town's roads and infrastructure. St Francis Bay is immensely affected by recent rains and as at today's date and to the best of our knowledge, no clear action plan has been made public by KM as to how the Provincial Department or that of the KM itself, plans on repairing and then maintaining the roads, collapsed Sand River culvert, services and infrastructure in this town. SFL is concerned about the influx of potential renters and home owners as a result of the construction of Nuclear-1 and that the demand on KM will merely increase, when it is clearly stretched beyond its limits and unable to cope with its current responsibilities. Your client's contribution to upgrades and / or repairs in this regard would certainly assist.

Response 2:

If and when the project is approved, Eskom will be engaging local municipalities on the upgrading of certain infrastructure, including roads and other facilities. It is acknowledged that there is an infrastructure backlog and that the Kouga Municipality does not have sufficient funds of its own for the

necessary upgrades. Thus, the following is recommended in Chapter 11, Section 11.3.1 of the revised Draft EIR version 2:

“Eskom must enter into negotiations with local authorities and other relevant authorities well before the start of construction to identify how it can be ensured that municipal services are capable of providing sufficient capacity for the expected influx of people into the affected area. Agreement must be reached between Eskom and these bodies on the apportionment of financial responsibility for infrastructure upgrades.”

Eskom cannot, however, be expected to be solely responsible for infrastructure upgrades, as current infrastructure backlogs are the responsibility of the municipality. It is for this reason that it has been recommended that agreement must be reached between Eskom and the other role players regarding apportionment of financial responsibility for infrastructure upgrades.

Comment 3:

3. Groundwater Table

Whilst the increase in groundwater levels in and around the Thyspunt site has been addressed in the Revised Draft EIR, we wish to voice our concerns but also offer to open direct discussions surrounding our experiences specifically with the recent rainfalls in the area and the effect which it had on the dune systems to our west and the flow of water through our estate and the village of St Francis Bay to the ocean. We have noted an exceptional rise in the water table through the eradication of alien vegetation whilst SFL was under development and also due to the recent high rainfalls. SFL would be interested in seeing the stormwater system designs proposed for the Thyspunt site with a view to minimise any chances of another flood as was experienced in November 2007.

Response 3:

Eskom would welcome the opportunity to engage with the SFL regarding its experience with groundwater, but it should be noted that such details are not on the table as yet. If and when the project is approved, the eventual site terrace design will consider storm water movement and experience from the area will be very much valuable to incorporate in the design.

Comment 4:

4. Eastern Access Road to Thyspunt

It is our understanding that the proposed access road off of the R330 will border directly onto SFL developer-owned property (erf 220 commonly known as the St Francis Links Eco Estate and potentially further SFL properties). Erf 220 property is earmarked for potential further subdivision and development by SFL's developers with a view to residential properties.

4.1 Noise and Lights

SFL is concerned about the noise pollution and what impact road lighting and headlights might have on the access road bordering erf 220 (and other SFL property) during and following the construction of the access road and would ask that your client, at its expense, includes a mutually agreed upon solution (to be included in the ROD) to minimise the impact as such, to erf 220 (and other SFL property) or its subdivided components. It is also our understanding that your client will engage the use of

helicopters for the power line pylon construction and this will impact the day-to-day core business of SFL, being that of golf and leisurely enjoyment / living. SFL needs to understand the flight path and timing of this exercise and what impact it might have.

4.2 Dust

SFL, now officially ranked in the Top 10 golf courses in South Africa (Golf Digest) and officially ranked as the number 1 Club Reception Venue for Weddings in South Africa (SA Bridal Industry Academy) is one of St Francis Bay's largest tourist attractions. Further to 4.1 above, SFL is concerned about the impact of dust on our estate, golf course and clubhouse and especially to the residential property privately owned by each of our homes owners. SFL would ask that your client, at its expense, includes a mutually-agreed upon solution (for inclusion in the ROD) to minimise the impact as such to the entire estate and that your client also commits to the tarring of the Eastern access road, as well as the long term maintenance thereof.

Response 4:

As indicated in Response 1, it is no longer proposed to use the R330 for construction traffic. Nevertheless, Eskom will engage with the SFL specifically regarding the issue of a solution to prevent vehicle lights intruding on the SFL.

The construction of pylons and the stringing of power lines by helicopter will take place over a very short period of time during construction. Eskom will engage with the SFL to ensure that the flights paths to the construction site result in minimum disruption to SFL's activities.

Your concern regarding dust generation from the Eastern Access Road is noted. The tarring of this proposed access road is part and parcel of the Nuclear-1 development proposal. Eskom would furthermore continue to maintain the Eastern Access Road since it would be the primary access road to the site during the operational phase, considering that the majority of the employees would be located in Jeffreys Bay and Humansdorp during the operation of the power station.

Comment 5:

5. **Eastern Access Road**

SFL would ask that your client ensures that proper stormwater drainage solutions are put in place to ensure sustainable and effective run-off from the newly constructed roads. Referring to Point 2 above, we believe that it would furthermore be in your client's interest to possibly propose a long-term and sustainable solution to the water run-off problems currently faced throughout the village of St Francis Bay and the peninsula.

Response 5:

From an operational point of view, it is critical for Eskom to put in place effective drainage for the Eastern Access Road to ensure accessibility of the Thyspunt site during construction and operation. Eskom will engage with the relevant roads authority to ensure that drainage issues underneath the R330 at the crossing of the Sand River are addressed. However, the drainage problems currently being experienced in the rest of St. Francis Bay and the peninsula are an historical function unrelated to the proposed construction of Nuclear-1 and as such, it is the Kouga Municipality's responsibility to address this issue.

Comment 6:

6. Excavated Sand

It is our understanding that the sand excavated during the Thyspunt construction would be disposed of offshore. A possible, and we are certain very welcome solution to the eroding beach problems currently faced in St Francis Bay, might be to consider disposing of the excavated sand to the main St Francis Bay beach in order to rehabilitate it. SFL would be in support of this measure.

Response 6:

Your comment is noted. The Kouga Municipality has informed the EIA team that it has found a solution to the eroding beach at St. Francis. Incidentally the root cause of the eroding beach is the development that has taken place on the eastern portion of the headland bypass dune system, and the consequent stabilisation of the dunes, which used to be a source of sand for the St. Francis Bay beach.

Comment 7:

7. Workers Access and Sea Vista School

SFL would support strict security controls at the Eastern road access point in order to avert temporary and permanent workers from settling in the already crowded Sea Vista township in St Francis Bay. Once again referring to Point 2 above, this township, besides severely lacking in basic services, is also subject to criminal activity and is largely under-developed. The local school is severely in need of upgrades and would be best situated east from where it is now so as to eliminate the need for learners to have to cross the R330 on foot, especially in light of the fact that the vehicle count will increase as a result of the establishment of the Nuclear Power Station. SFL would be in support of your client's potential contributions in this regard and would like to take discussions further.

Response 7:

Your comment is noted. Eskom has indicating its willingness to explore solutions to ensure the safety of school-going children.

Comment 8:

8. Meteorological Mast

SFL would request that SODAR technology be used (as has been suggested) so as to eliminate the need for the mast with the red light at the top. It is our understanding that this red light might be visible from our estate.

Response 8:

Your comment is noted.

Comment 9:

9. Transmission of Electricity

Please outline where the proposed network of high voltage transmission and distribution lines might run and what perceived effect it would have on SFL.

Response 9:

The routes of the transmission lines are indicated in the environmental impact assessments for the transmission lines, which is a separate EIA to the Nuclear-1 EIA process. The reports for the transmission line EIA process are available from: <http://www.eskom.co.za> or <http://www.sivest.co.za>

Comment 10:

10. Fresh Water and Electricity

Please outline where your client plans on obtaining fresh water as well as electrical supply from during the construction period.

Response 10:

As indicated in the Project Description (Section 3.1.8 of the Revised Draft EIR), fresh water will be obtained from a desalination plant during construction and operation. Please refer to Section 3.8.4 of the Revised Draft EIR for information regarding power supply to the site during the construction phase.

Comment 11:

In closing, **SFL requests a workshop between yourselves / your client and our representatives as soon as possible** with a view to discuss the issues raised above, but to also open communications between the parties in order to furnish ourselves with reliable and correct information to pass on to our home owners on our estate.

We trust that satisfactory solutions may be found between your client and SFL on the points above and we reserve our rights in this regard.

Thank you for your consideration and we look forward to hearing from you.

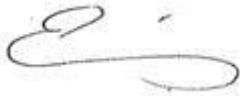
Response 11:

Your request is noted. Please refer to the schedule below for the list of public meetings that will be held during the review of the RDEIR Version 2. Please attend the meeting which is the most convenient for you.

VENUE	DATE	TIME
Atlantic Beach Golf Club, Melkbosstrand	12 October 2015	18:00 to 20:00
Kenilworth Community Presbyterian Church, Kenilworth	13 October 2015	18:00 to 20:00
Gansbaai Tourism Bureau, Gansbaai	15 October 2015	18:00 to 20:00

Oyster Bay Hall, Oyster Bay	19 October 2015	18:00 to 20:00
St. Francis Links Golf Club, St. Francis Bay	20 October 2015	18:00 to 20:00
Sea Vista Community Hall, Sea Vista	21 October 2015	18:00 to 20:00
Newton Hall, Jeffrey's Bay	22 October 2015	18:00 to 20:00
Humansdorp Golf Club, Humansdorp	23 October 2015	18:00 to 20:00

Yours faithfully
for GIBB (Pty) Ltd



The Nuclear-1 EIA Team