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Thyspunt Alliance  
St Francis Bay Resident's Association  
St Francis Kromme Trust

Dear Mr Thorpe, Thyspunt Alliance and its members, the St Francis Bay Resident's Association and the St Francis Kromme Trust

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

**Comment 1:**

**COMMENT ON THE TRANSPORT IMPACT REPORT**

**THYSPUNT NUCLEAR 1 DRAFT ENVIRONMENTAL 2nd DRAFT IMPACT ASSESSMENT REPORT**

Prepared by: Trudi Malan & Ray Parker on behalf of the Thyspunt Alliance.

Although the revised traffic impact assessment contains significantly more information than the original TIA that we commented on in 2010, it would appear that the main issues have not been adequately addressed. This relates primarily to the effect that construction traffic, including abnormal loads, will have on the road network and communities within Humansdorp, adjacent to the R330, and the greater St Francis Bay area.

The TIA infers, in section 10.1.1 of the report, that the bulk of construction traffic (i.e. construction materials, construction workers and staff, and aggregate) will be transported via the proposed secondary access to the site, i.e. via the Oyster Bay road. In principle, this arrangement would appear to be the best option, as this would minimise the effect on the R330, and hence on the adjacent communities in St Francis Bay and Humansdorp.

However, the traffic analysis and trip distribution diagrams do not indicate this, and it would appear that the bulk of the traffic has been "loaded" onto the R330 (see typically diagrams C13 to C16). This situation is exasperated by the proposals to direct the bulk of construction traffic through Humansdorp. It is patently obvious that, firstly, Saffery Street and Main Street are not suitable for the conveyance of large volumes of construction traffic. Saffery Street is a residential road and is mostly bordered by residential properties along most of its length. Main Street serves business properties and the ongoing in-and-out parking movements will clash severely with the high volumes of construction traffic (during and outside of peak periods).

Secondly, the high incidence of pedestrian traffic along the R330 between Humansdorp and Kwanonzamo should be a major cause for concern. The TIA proposes "grade separation" – does this mean a pedestrian footbridge over the R330? Pedestrian footbridges are known to be problematic, as

pedestrians then need to be prevented (by for example physical barriers / walls) from entering the road reserves at any place other than the footbridge.

We have been informed by the consultants that they are currently busy reviewing the Transport Impact Report. This would be the third revision and it should be clear that there is major problem with regard to access to the Thyspunt site. We find it unacceptable that although most of the concerns about the access roads were raised in the Scoping phase of the project, the specialists ignored these very valid concerns and persisted in presenting a report that favours the developer. We believe that one of the main reasons for this is that changing the access routes will incur further costs for the developer at the Thyspunt site.

### **Response 1:**

Your comments are noted. Similar concerns from the public have been raised and acknowledged regarding the transportation infrastructure around the Thyspunt site. As such the Transport Specialist study was revised to address the comments and the revised report will be made available for public comment and review as part of the Revised Draft EIR Version 2. The revised report recommends that the main street through Humansdorp and Saffery Street be bypassed. New transport roads for abnormal load vehicles were therefore considered and a number of alternate bypasses have been investigated,

The revised transport specialist study further acknowledges that the Thyspunt site requires significant transport infrastructure upgrades. The recommended routes in Version 9 of Transport Report were revised after the Revised Draft EIR was provided for public comment in May 2011. Based on this revision, the R330 is now proposed to be used only for passenger vehicle traffic and abnormal load transport, and sections will require upgrading for this purpose. The Oyster Bay Road is now proposed to be upgraded to a surfaced road to be used during the construction and operations phases for staff access and heavy vehicle traffic and as an emergency evacuation route for areas such as Oyster Bay. The DR1762, which links the R330 and Oyster Bay Road is now proposed to be surfaced to provide improved east-west connectivity. As stated the bypass roads to the east and west of Humansdorp are also now proposed to be constructed to reduce the traffic impact on central Humansdorp.

### **Comment 2:**

The TIA makes the following statement:

#### 3.3.1 Locality of the Site

Thyspunt is situated on the east coast of South Africa and lies within the Eastern Cape Province approximately 80 km west of Port Elizabeth as shown in Figure 3.5. It is located in the Cacadu District Municipality on the Kouga Coast.

Vaalputs is located in the Northern Cape Province cross-country from Thyspunt approximately 750 km to the north-west. Humansdorp is located 15 km to the north, Oyster Bay is located 7 km west of the site, and Umuzamawethu is located 5 km from the site.

Please note, that although some of the highest impacts will be felt by the communities of St. Francis Bay, Sea Vista & Cape St. Francis – the names of these towns are not mentioned in the locality of the site. Furthermore it is clear that the approximate situations of the various towns listed were not actual road distances, but more of a “as the crow flies” measurement.

### **Response 2:**

In recognition of the potential traffic impacts on St. Francis, the Traffic Impact Assessment has been substantively revised so that heavy construction traffic will bypass Humansdorp. Only ultra-heavy

vehicles (>100 tonnes; a total of 63 trips over the nine-year construction period) are proposed to use the Eastern Access Road and the R330.

**Comment 3:**

Figure 6.2 of the Traffic Impact Assessment does not correlate to any of the proposed access routes. The road indicated in figure 6.2 as the main access road is the road leading to Rebelsrus, this road has never before been indicated as the main access road to the site. The confusion that wrong information like this creates is completely unacceptable in a document of this importance. This again clearly indicates that there is not only confusion between the consultant and the developer but even the specialists are not quite sure where they need to place the main access road.

**Response 3:**

Your comments are noted. The entire Traffic Impact Assessment, including figures, has been revised.

**Comment 4:**

In 10.1.2 of the TIA the specialists described the scope of their assessment and requirements for a main access route. They state that route lengths and impact on settlements were assessed.

The specialist then completely ignores the impact on settlements and comes to the startling conclusion that the R330 must be used as main access route. It is clear that the impact on settlements was not the main driver behind this conclusion but rather the length of the route and the ease of traverse. Both of these criteria favour the developer. The consultant does acknowledge that the impact on people will be substantial.

Three possible alignments for the eastern access route are discussed and the statement is then made that:

Alignment E3 is the longest route. It starts 2 km south of the R330 and crosses land that has low environmental sensitivity in a westerly direction, and then travels in a westerly direction through a corridor between St Francis Links and the "Dunes" development towards the site. To avoid impacting the St Francis Links this route alignment does not use the St Francis Links service road. Alignment E3 is therefore the recommended eastern access alignment.

We would like to contest the statement that alignment 3 crosses land that has a low environmental sensitivity. We would like the specialist to define "low environmental sensitivity". The fact that this road will cross a wetland that caused the washing away of the R330 in 2007 is not mentioned in the report. The statement of "low environmental sensitivity" is also in stark contrast to the following statement in the Freshwater Ecology Study:

*Infilling of the ecologically important, largely un-impacted wetlands that occur on and near to the Thyspunt site, and the impacts on wetland function and habitat quality that would be associated with this infilling, has been assessed as a negative impact of high ecological significance. This assessment applies to all of the road alternative*

On page 90 the TIA states:

*Detailed assessments of all the major structures will be conducted. Bypasses for several interchanges will be constructed as a result of height restrictions for overhead bridges.*

We fail to understand how these assessments cannot be included in the TIA for the Thyspunt Site. We are of the opinion that these details were left out of the report to favour the developer. No mention is made in the report about either the Kromme River Bridge or the culvert bridge that crosses the Sand River. This bridge has subsequently been washed away during the 2011 flood event and has in fact been threatened by floods in prior years. Furthermore none of the details available in the Abnormal

Load movement to Duynfontein is mentioned in the Thyspunt study. This study will not be deemed complete until all the relevant information is included.

In section 10.8 of the TIA a list of mitigation actions are recommended. There is no indication as to who will be responsible for these actions, when these actions will be implemented, what the costs of these actions will be and who will be responsible for these costs.

**Response 4:**

Your comment is noted. As per our Response 1 the Traffic Impact Assessment Report has been revised to address comments received in terms of access to the Thyspunt site. Furthermore the impact of the proposed infrastructure upgrade on the Social Environment has been assessed as part of not only the Social Impact Assessment (Appendix E18 of the Revised Draft EIR Version 1) but also the Noise and Visual Impact Assessments. The recommendations of these studies as well as those of the Heritage, Wetland and Botany Specialists have informed not only the revised Traffic Impact Assessment (as mentioned in Response 2 above) but also in a recently commissioned report which reconsiders the options for western access to the Thyspunt site. This report is attached as Appendix 31 to the revised Draft EIR Version 2.

Yours faithfully

A handwritten signature in black ink, appearing to be a stylized 'S' or 'G' followed by a horizontal line.

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