

THYSPUNT ALLIANCE

NUCLEAR 1 **REVISED DRAFT ENVIRONMENTAL REPORT**

APP. E23 **NOISE ASSESSMENT**

Response compiled by H.Thorpe and submitted on behalf of the St Francis Bay Residents' Association, the St Francis Kromme Trust and the Thyspunt Alliance

General Comment

This assessment, together with the Transportation Assessment, feed into the Social Impact Assessment. It is principally concerned with the noise impact of construction on site, and of the construction of new roads. It does briefly, but totally inadequately, mention the impact on local communities of transportation of materials to site.

This has to be one of the most complacent of all the specialist reports.

The reality is that the construction of a nuclear plant at Thyspunt, whose main access road is the R330, will involve hundreds of thousands of heavy to exceptionally heavy loads passing right past a large section of the Kromme River community and St Francis Bay, possibly 24 hours-a-day if a shift system is used, over an already busy and noisy bridge, then up a long and relatively steep hill, which runs from the current town entrance to Homestead Road, past a retirement complex and The Links golf estate, for a period of nine years . The noise impact of this would be massive, continuous, highly disruptive and unmitigable. Despite this, the Executive Summary contains the following statement, which is repeated in the conclusions on p. 38:

“the noise impact (of transportation of materials and equipment to site) on a small number of residences in the nearest informal settlements along the R330 at Sea Vista . . . would be medium.”

Questions arising from this breath-takingly complacent comment are whether the specialist is aware of the existence of St Francis Bay, or has ever been there, or has deliberately chosen to ignore it.

A second question is whether the categorization of the impact as “medium” is based on the Impact Assessment Criteria contained in Ch7, Table 3-16.

A third question would be whether the specialist placed a sound monitor on the hill going up from the traffic circle towards Sea Vista. This would be serious low-gear work for heavy vehicles going up, and probably air brakes going down. To claim that this would have a low impact is nonsense.

St Francis Bay is a highly successful, and indeed unique resort town, with a world-wide reputation. It is a testimony to the vision and energy of a South African entrepreneur, who has set in place a very desirable amenity for the potential benefit of the entire country. A significant portion of the permanent population comprises retirees, who have worked their entire lives to enable them to live in what they regard as an incomparable environment. To impose a transportation system of the type envisaged on such a community would be unjust and unreasonable. **Despite this, the specialist does not even mention it.**

Attention is drawn to the Nuclear Site Investigation Programme (NSIP), a specific recommendation of which was that the small holiday resorts along the coast be left unaffected. Either the specialist did not study these reports, or Arcus Gibb failed to brief him on this, or it has been deliberately ignored.

Impact Assessment Criteria

Attention is drawn to the revised impact assessment criteria contained in Ch 7, Table 7-16, p. 7-32 ff. It would appear that the specialist has not used these new criteria with regard to the noise impact of transportation in the vicinity of the Kromme River and St Francis Bay.

Even here, a problem arises, in that the duration figures given in the table are immediately contradicted by the explanatory notes. The notes seem to follow the original ratings, and have not been revised. Table 7-16 seeks to address an objection raised in the first draft, that nine years was far too long a period for the rating of a duration impact as low. In this particular case, the construction period is expected to be nine years, and this being the case, in terms of Table 7 – 16, any impact arising would be of high duration.

Below is our version of a table for the noise impact of traffic across the Kromme River and past St Francis Bay, based on Table 7 -16 in the revised draft.

Kromme River & St Francis Bay

Traffic Noise Impact Assessment (see similar exercise in comment on Impact Assessment & Revised Draft EIR Table 7 – 16

Assumptions: 9 year construction period
 R330 regarded as site
 Loss of “sense of place” regarded as irreplaceable resource.

Nature	Negative
Extent	Medium (beyond immediate surrounds)
Duration	High (9 years to permanent)
Intensity	High (thousands of heavy-duty vehicles climbing hill, possibly 24 hours per day/night)
Consequence	(Duration, extent, intensity & irreplaceable resource) High
Probability	Definite (unless road re-directed from Kromme & St Francis)
Significance	High (high consequence and high probability).
Reversibility	Medium (Traffic impact reduced, but not removed after construction phase)
Irreplaceable	Yes (sense of place)
Confidence	High
Cumulative	Medium (roads only)

High significance indicates that mitigation measures are required

Proposed mitigation measures

The only mitigation measures proposed relate to construction on site, road construction and ultra-heavy loads. There is no mention of the impact of heavy to abnormal loads, or of commuter traffic on the surrounding communities . In consequence, the above ratings are not mitigated in any way, nor can they be In fact the situation is worse than shown in the report, since no attention is paid to

the huge increase in traffic over peak holiday periods. This could be 400% over normal traffic.

Conclusions

This report is typical of those produced for this EIA. It deliberately or negligently disregards real problem issues, and ends with recommendations which favour the developer. It calls into question the integrity of the entire EIA.

We would argue that a “high significance” overall rating should be given to traffic noise in the St Francis area, and that this should strongly influence the decision to proceed with this aspect of the project.

This being the case, we demand that no access road to Thyspunt should pass within one kilometer of an urban edge. If no suitable road access is possible on this basis, this will be yet another flaw in a flawed site selection.

Additional note

This response is based only on the impact on St Francis Bay and the Kromme River. It makes no mention of the Transportation Specialist’s proposal that all the heavy traffic should use a small residential road called Saffery Street in Humansdorp. If that does not illustrate the naivete of the transportation report, nothing will. When announced at a public meeting in St Francis Bay, attended by some 200 people, the whole hall simply collapsed in mirth. Since there is no mention of it in the Noise Impact Report, we have to assume that the specialist was either not aware of this proposal, or chose to ignore it. From a noise perspective it is completely unacceptable.