

## Appendix E5: Comments & Responses Report

**Table 1: Comments from Interested and Affected Parties on the Background Information Document (BID)**

Interested and/or Affected Party	Issue raised	Response
<b>Comments relating to the process</b>		
J Baeyens - Capeco	The Background Information Document was only forwarded to Capeco on 18 February 2016, two working days before the deadline for comment.	[SRK] Please refer to Appendix E2 containing a delivery receipt for the BID forwarded per email to Capeco on 20 January 2016. The email of 18 February 2016 was a reminder of the deadline for comment on the BID, which expired at 12h00 on 22 February 2016. Capeco was thus afforded 32 calendar days to submit their initial comments. Further opportunities to comment were provided on the BAR.
Cllr G Rautenbach – Ward 8 Councillor	Why was the ward 8 office not informed of the project?	[SRK] Please refer to Appendix E2 containing a delivery receipt for the BID serving as notice of the project and requesting initial comments, forwarded to the Ward 8 office on 20 January 2016. A reminder of the deadline was also forwarded on 18 February 2016. SRK has, incorporated the Councillor's comments received on 2 March 2016. Further opportunities to comment were provided on the BAR.
J Baeyens - Capeco	Require the names and contact details of all IAPs and stakeholders.	[SRK] A list of all notified and registered parties appears in Appendix E5 of the BAR (this report).
J Baeyens - Capeco	The BID does not specify crucial elements pertaining to electricity masts, location of servitudes, design etc.	[SRK] The purpose of the BID is to alert potential IAPs of the proposed project. More detailed information has been provided in the BAR (this report).
M Crocker – Capeco W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Regulations pertaining to EIA state that applicant must first obtain written consent of landowner to undertake the activity before applying for environmental authorisation. No written consent has been sought or obtained in respect of erf 1226 Fairview. No servitude is registered in favour of the municipality or Eskom over the property and no special conditions in favour of Eskom is reflected on the title deed.	[SRK] According to regulation 39(2) of the NEMA 2014 EIA Regulations, written consent is not required for linear activities. In this Basic Assessment process all landowners were notified of the proposed activity and will have various opportunities to comment on the assessment. The registration of a servitude is a process that falls outside the EIA Regulations and will be conducted by the NMBM.
Cllr G Rautenbach – Ward 8 Councillor	When was the public consultation for the project conducted?	[SRK] The public participation process is still ongoing and commenced with the distribution of the BID. The BID (Appendix E1) contains a flow diagram which sets out the process and indicates further opportunities for public input.
<b>Comments relating to design</b>		
E van Wyngaardt – Local Resident	Section A to B should not require to be overhead as an underground pipe (conduit) exists.	[NMBM] The option of underground cables for additional sections of the route is not financially feasible.  [SRK] Please refer to section A(2) of the BAR for a discussion on project alternatives.

Interested and/or Affected Party	Issue raised	Response
M Crocker - Capeco	Capeco will not permit overhead cables to run through its property (erf 1126 Fairview), however will accommodate proposal if electrical supply is placed underground. We will consider option of underground installation from numbers G, E1 to E and GF to E respectively as you only need a servitude width of 1.5m.	[NMBM] Comment noted. The option of underground cables for additional sections of the route is not financially feasible. [SRK] Please refer to section A(2) of the BAR for a discussion on project alternatives.
R van Schalkwyk – Local Resident W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Underground cable is a better option.	[NMBM] The option of underground cables for additional sections of the route is not financially feasible. [SRK] Please refer to section A(2) of the BAR for a discussion on project alternatives.
R Odendaal – Ward 3 Councillor	Alternatives to high level masts must be investigated.	[NMBM] The option of underground cables for additional sections of the route is not financially feasible. [SRK] Please refer to section A(2) of the BAR for a discussion on project alternatives.
R van Schalkwyk – Local Resident	Oppose the erection of petechane style towers in the area between points A & C.	[SRK] Comment noted.
R vanderlinden – Local Resident	Powerlines should be placed on the other side of the railway line towards Lorraine and not Lorraine Manor and Lovemore Heights.	[NMBM] The option of installing the powerline on the railway side was initially considered, but due to the plans of refurbishing the railway line this option is practically not feasible. Space is a limitation for the clearance between the proposed powerline and the railway line.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Eskom guideline provides that for a 132 kV powerline a minimum width is 18 m from the centreline of the powerline, thus minimum servitude distance of 36 m. However BID indicated a servitude width of 25 m.	[Bosch Stemele – Project Engineers] The Municipal By-Laws allow for a 25 m servitude.
<b>Comments relating to the environment</b>		
NR Jali – Local Resident	Presence of guinea fowl in the Overbaakens area that will be affected by the bush clearing.	[SRK] All potential impacts, including wildlife, are discussed in section D(2) of the BAR (this report), including proposed mitigation measures.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Aboveground powerlines will affect animals and birdlife in the area. Animals will suffer loss of habitat and environmental look would be unsightly.	[SRK] All potential impacts, including wildlife and avifauna, are discussed in section D(2) of the BAR (this report) including proposed mitigation measures.
NR Jali – Local Resident	Area in Overbaakens is used by people as a dumping site.	[SRK] Comment noted. Please refer to section D(2) of the BAR (this report) for a discussion on potential impacts, including waste management, as well as proposed mitigation measures.
J Baeyens - Capeco	The proposed alignment crosses over onto property owned by Capeco and classified as 'sensitive ecological areas' in our RoD.	[SRK] All potential impacts, including terrestrial and aquatic areas and resources, are discussed in section D(2) of the BAR (this report). An Aquatic Impact Assessment has also been conducted by a specialist and is included in Appendix D of the BAR.

Interested and/or Affected Party	Issue raised	Response
M Crocker - Capeco	Water channel along which the electrical supply is proposed to run is sensitive no-go area together with a 100 year floodline which has already encroached and minimized the footprints of our approved development rights (as per approved RoD ECm1/LN1&3/M/12-88)	[SRK] All potential impacts, including terrestrial and aquatic areas and resources, are discussed in section D(2) of the BAR (this report). An Aquatic Impact Assessment has also been conducted by a specialist and is included in Appendix D of the BAR.
<b>Comments relating to social impacts</b>		
E van Wyngaardt – Local Resident R van Schalkwyk – Local Resident	Open space is utilised by public for various recreational activities which overhead powerlines would interfere with.	[SRK] Comment noted. It is not clear from the comment what recreational activities are referred to. Please refer to section D(2) of the BAR (this report) for a discussion on potential impacts as well as proposed mitigation measures.
NR Jali – Local Resident	Proposed alignment crosses over a path used by residents as a shortcut to the shops.	[SRK]. Comment noted. The proposed powerline will not impact on pedestrians visiting the nearby shops.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	A cultural heritage expert must be consulted. The natural landscape would be negatively affected by aboveground powerlines.	[SRK] All potential impacts, including archaeological and palaeontological impacts, are discussed in section D(2) of the BAR (this report). Specialist input is included in Appendix D of the BAR. The report will be submitted to the heritage authorities, who will comment on the need to assess impact on cultural landscapes. To SRK's knowledge, the visual quality of the area does not enjoy special protection in terms of the National Heritage Resources Act (Act No. 25 of 1999).
<b>Comments relating to the economic impacts</b>		
R vanderlinden – Local Resident M Crocker – Capeco R Odendaal – Ward 3 Councillor	Depreciation of property values due to presence of overhead powerlines.	[SRK] Comment noted. Please refer to section D(2) of the BAR (this report) for a discussion on potential impacts, which includes impact assessment on property values.
M Crocker – Capeco W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Erf 1226 Fairview has approval for residential development and the potential for negative financial impact on the landowner must be considered.	[SRK] Comment noted.
M Crocker – Capeco R Odendaal – Ward 3 councillor	Construction of high level masts will have a negative impact on future growth and development in the area.	[SRK] A clear reason is not provided regarding how high level masts would limit future growth and development in the area. In terms of the electricity provision, the distribution network is critical to enhance development growth in the larger area.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Maintenance of aboveground powerlines is costly compared to underground cables.	[Bosch Stemele – Project Engineers] Maintenance cost of overhead line is not that much higher and if the capital cost of underground cable is considered, the maintenance cost of overhead lines becomes immaterial.

Interested and/or Affected Party	Issue raised	Response
<b>Comments relating to the visual impacts</b>		
J Baeyens - Capeco	Since no pictures of the visual impact are included, IAPs cannot judge the necessity to register.	[SRK] The purpose of the BID is to alert potential IAPs of the proposed project. Further opportunities to comment were provided by the distribution of the Pre-application DBAR and the Post Application DBAR.
M Crocker - Capeco	Visual impact will impact viability of the area as a residential intensification and infill node. Will negatively impact character of the area.	[SRK] All potential impacts, including visual impacts, are evaluated and discussed in section D(2) of the BAR (this report), including proposed mitigation measures.
<b>Comments relating to safety concerns</b>		
M Crocker – Capeco R Odendall – Ward 3 Councillor	Concern regarding electromagnetic radiation from masts.	[SRK] All potential impacts, including the electromagnetic field (EMF), are discussed in section D(2) of the BAR (this report).
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Aboveground powerlines create health risks which place cost and burden on the state.	[SRK] All potential impacts, including health risks associate with powerlines in general, are discussed in section D(2) of the BAR (this report). It is unclear whether this comment refers to health risks that are specific to overhead powerlines as opposed to health risks that are specific to underground powerlines.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Aboveground powerlines pose health danger to schools, residential areas and a soon-to-be hospital nearby.	[SRK] Note that no specifics are mentioned regarding the type of health dangers referred to in the comment. All potential impacts, including health risks associate with powerlines in general, are discussed in section D(2) of the BAR (this report).
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Fire hazards would be negated by underground cables.	[SRK] All potential impacts, including fire, are discussed in section D(2) of the BAR (this report), including proposed mitigation measures.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd A cultural heritage expert must be consulted. The natural landscape would be negatively affected by aboveground powerlines.	Aboveground powerlines will affect the functioning of hospital's equipment.	[SRK] It is not clear in what way the proposed powerline could affect equipment used in the hospital that is to be constructed. Also, it is unclear whether this comment refers to risks that are specific to overhead powerlines as opposed to risks that are specific to underground powerlines. Note that all potential impacts are discussed in section D(2) of the BAR (this report), including proposed mitigation measures.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Discussion of foreign law pertaining to issue of electromagnetic frequency.	[SRK] This BA process is conducted according to South African legislation. No comparative legislation applies.  All potential impacts, including electromagnetic field (EMF), are discussed in section D(2) of the BAR (this report).  An underlying assumption is that design standards, including buffers for powerlines, as applied by the NMBM, already incorporate health and safety considerations consistent with international standards.
<b>Comments of a general nature</b>		
E van Wyngaardt – Local Resident	All the residents of Macon Road object to an overhead line in front of our houses.	[SRK] Note that <u>no</u> signed petition was included to confirm that all residents of Macon Road object to the overhead powerline.

Interested and/or Affected Party	Issue raised	Response
NR Jali – Local Resident	At this stage I do not know if I will be affected by the powerline however, point K is almost at my backyard.	[SRK] Please refer to map in Appedix A indicating property details in the surrounding area. The proposed powerline does not extend across your property.
M Crocker - Capeco	Provided hard copy of full objection submitted in respect of previous EIA carried out by Coastal and Environmental Services (CES).	[SRK] Noted and acknowledged. All objections contained in the document which are applicable and relevant to the current BA have been dealt with under the specific headings in this Comments & Responses Table.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Applicant must in terms of NEMA implement mitigation measures. Mitigation measure would be to construct an underground cable system.	[SRK] The option of installing an underground cable for the entire route has been eliminated during the design phase of the proposed development due to costs. Please see the discussion regarding alternatives in section A(2) of the BAR.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Applicant must consider any feasible and reasonable alternatives to the activity, such as underground cables.	[NMBM] The option of installing an underground cable for the entire route was eliminated during the design phase of the proposed development due to costs. [SRK] Please see the discussion regarding alternatives in section A(2) of the BAR.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd	Eskom is bound by the constitutionally guaranteed right to an environment which is not harmful to your health or wellbeing, which is not achieved by aboveground powerlines.	[SRK] Note that the NMBM is the applicant for this proposed powerline. The environmental basic assessment process is conducted to assess any potential impacts that could result from the proposed activity including impacts to health and well-being. Please refer to section D(2) of the BAR for a discussion on all potential impacts, including recommended mitigation measures.

**Table 2: Comments from Interested and Affected Parties on the Pre-Application Draft Basic Assessment Report (DBAR)**

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
<b>Comments relating to the process</b>		
J Baeyens - Capeco	Who is the party driving the application, Eskom or the municipality?	[SRK] The NMBM is the applicant for the proposed powerline.
J Baeyens - Capeco	Who is the legal representative of the applicant (director, government official)?	[SRK] The Basic Assessment process (at this stage) is not litigious in nature, therefore no legal representative has been appointed for this purpose.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd and Kirland Investments (Pty) Ltd	The delay in responding to clients' request for additional information as well as denying their request for an extended deadline for comment was aimed at frustrating their ability to submit full and comprehensive comments on the DBAR.	[SRK] Note that it is not SRK's intension to prevent any comments from any IAP or stakeholder. We welcome any comments and all IAPs have been advised of the process and public comments periods. SRK advised the commenter per email on 17 May 2016 that their request for additional information would be reflected and addressed in the Post-Application DBAR and that they would have the opportunity to comment on our responses prior to any decision being made by the competent authority. The commenter confirms his knowledge of this in point 31 of his letter.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd and Kirland Investments (Pty) Ltd	Requests a copy of any further report to be provided immediately once finalized.	[SRK] Noted.
<b>Comments relating to design</b>		
R van Schalkwyk – Local Resident L Minnie – Local Resident M Elliot – Local Resident S Clegg – Local Resident T Swart – Local Resident L Pieters – Local Resident E van Wyngaardt – Local Resident H Gray – Local Resident M Reid – Local Resident K Steyn – Erstwhile Resident C Gagiano – Local Resident P Alberts – Local Resident R Vanderlinden – Local Resident	Insist that powerline be underground.	[NMBM] The option of installing an underground cable for the entire route was eliminated during the design phase of the proposed development due to costs. [SRK] Please see the discussion regarding alternatives in section A(2) of the BAR.
E van Wyngaardt – Local Resident	It is stated that underground cabling is not financially feasible. Are you aware that there is currently a 3m deep trench available as they are laying stormwater pipes? With correct planning the same trench can be utilized for the cables (photos of trench attached),	[SRK] Note that the largest cost of the installation of underground cable is not the trenching but the actual cable.

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd and Kirland Investments (Pty) Ltd	We suggest that the information furnished by the applicant in relation to the relative cost of constructing the powerline underground as opposed to aboveground, be circulated to all interested parties and that the date for submission of comments be extended.	[SRK] Please refer to section section A(2) of the BAR where a cost breakdown has been provided.
J Baeyens - Capeco	What is the extra cost for (partly) putting the powerline under the ground?	[SRK] Please refer to section A(2) of the BAR where a cost breakdown has been provided.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd and Kirland Investments (Pty) Ltd J Baeyens - Capeco	Request documentation supporting costs difference in respect of overhead and underground powerlines. A detailed cost breakdown is required from the involved engineers.	[SRK] Please refer to section A(2) of the BAR where a cost breakdown has been provided.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd and Kirland Investments (Pty) Ltd	<p>The NMBM statement that it is not economically feasible to place the cabling underground due to budget restraints is misleading as:</p> <ul style="list-style-type: none"> <li>• Any additional cost incurred by underground cabling would be recoverable by an electricity tariff determined by NERSA; and</li> <li>• No consideration has been given to imposing a levy on the approval of the developments necessitating the additional capacity, to fund the cost of improvements to the NMBM electrical distribution network.</li> </ul>	[NMBM] Underground is extremely expensive compared to overhead cable (refer to the cost breakdown in the BAR) and the NMBM generally does not put 132 kV infrastructure underground due to the cost unless it is practically impossible to do otherwise. The cost of the underground will be borne by the NMBM which would mean recovery of the cost from the tariff leading to every customer would have to pay because of the demand of a single customer. Technically having a combination of underground and overhead poses problems in the reliability of supply as the overhead protection scheme poses risk of damage to the underground cable.
J Baeyens - Capeco	It is unclear where the powerline will run. The drawing is vague over a satellite picture. We need precise drawings where the powerlines would be running over (or under) and also the exact locations of the infrastructure on the ground (pilots in concrete).	[SRK] Maps indicating property numbers and boundaries are included in Appendix A. Exact positions of the pylons will only be determined in the detailed design phase. These will be design to avoid sensitive areas (e.g. wetlands) as described in the BAR.
J Baeyens - Capeco	We are unable to assess the impacts with the proposed alignment co-ordinates provided in the DBAR (Appendix G). We need detailed architectural drawings of any infrastructure (pillars, concrete foundations, access roads, fences) that would be constructed.	[SRK] Exact positions of the pylons will only be determined in the detailed design phase. These will be design to avoid sensitive areas (e.g. wetlands) as described in the BAR. Concerns regarding sensitive areas should be submitted as soon as possible for this to be included in the detailed design process.

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
J Baeyens - Capeco	It is unspecified how and on what grounds these pillars would be placed on our land, how much land would be bought, at which conditions.	[NMBM] An 'Affected Properties' map is included in Appendix A of the BAR. Pillars will be placed more or less in line with the alignments showed on this map depending on the option chosen for development. The NMBM will appoint services providers to conduct the detailed design in due course. In addition, the NMBM Estate Division will arrange meetings with affected property owners.
J Baeyens - Capeco	What are the needs (from where to where) for which these line will cater and what causes the extra demand?	[SRK] Please refer to section A(9) of the BAR talk details the need and motivation for the project.
J Baeyens - Capeco	Why can the existing lines running alongside William Moffat on one side and Dijon on the other side of Circular Drive not be upgraded to cater for extra capacity?	[NMBM] The existing lines are fed from the 66 kV network and the plans are to establish 132/11 kV transformation which will take care of the current load and future load growth. Upgrading the lines will not be a solution as long lengths of cable will have to be run to supply the load. Such action will cause voltage drops which are not a desired situation as it will lead to overheating.
J Baeyens - Capeco	We need a detailed study of what the alternative options were and how they were studied.	[SRK] Please refer to section A(2) of the BAR. Additional information has been added regarding the project alternatives as well as a cost breakdown of the above and below ground infrastructure requirements.
<b>Comments relating to the environment</b>		
J Baeyens - Capeco	The proposed powerline appears to run in /over a riverbed, with 100 year floodline.	[SRK] Please refer to section D(2) of the BAR as well as the Aquatic Specialist Study in Appendix D for a discussion regarding the watercourses in the area and potential impacts.
W Parker (JGS) – obo Stylestar Properties 191 (Pty) Ltd and Kirland Investments (Pty) Ltd	The DBAR does not indicate whether the placement of the powerline bases occurs within the 1:100 year flood line for the water courses along and in which the proposed powerline shall travel.	[SRK] Note that detailed design for the pylon positions has not been completed. The design will consider all recommendation in the BAR as well as the Aquatic Specialist study in order to minimize impacts to the watercourses in the vicinity.
<b>Comments relating to the economic impacts</b>		
R van Schalkwyk – Local Resident L Minnie – Local Resident M Elliot – Local Resident S Clegg – Local Resident T Swart – Local Resident L Pieters – Local Resident E van Wyngaardt – Local Resident H Gray – Local Resident M Reid – Local Resident K Steyn – Erstwhile Resident C Gagiano – Local Resident P Alberts – Local Resident R Vanderlinden – Local Resident	Residents are expected to absorb a loss in value to their property.	[SRK] All potential socio-economic impacts, including impact on property values have been included in section D(2) of the BAR as well as the Socio-Economic Specialist Report included in Appendix D.



Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
R van Schalkwyk – Local Resident	There will be a definite drop in property values. What are the proposed mitigation measures for this?	[SRK] All potential socio-economic impacts, including impact on property values have been included in section D(2) of the BAR as well as the Socio-Economic Specialist Report included in Appendix D. Recommendations for mitigation are included in this section as well.
J Baeyens - Capeco	Presence of powerlines will result in a loss of revenue/ land of Capeco because people will not buy units because of health concerns and aesthetic impact.	[SRK] All potential socio-economic impacts as well as health impacts have been included in section D(2) of the BAR as well as the Socio-Economic Specialist Report included in Appendix D. Please specifically refer to the discussion in the Socio-Economic Specialist Report regarding sense of place.
<b>Comments relating to the visual impacts</b>		
R van Schalkwyk – Local Resident L Minnie – Local Resident M Elliot – Local Resident S Clegg – Local Resident T Swart – Local Resident L Pieters – Local Resident E van Wyngaardt – Local Resident H Gray – Local Resident M Reid – Local Resident K Steyn – Erstwhile Resident C Gagiano – Local Resident P Alberts – Local Resident R Vanderlinden – Local Resident	Natural appearance and tranquility of area will be lost.	[SRK] All potential socio-economic impacts, including impact on sense of place have been included in section D(2) of the BAR as well as the Socio-Economic Specialist Report included in Appendix D.
R van Schalkwyk – Local Resident L Minnie – Local Resident M Elliot – Local Resident S Clegg – Local Resident T Swart – Local Resident L Pieters – Local Resident E van Wyngaardt – Local Resident H Gray – Local Resident M Reid – Local Resident K Steyn – Erstwhile Resident C Gagiano – Local Resident P Alberts – Local Resident R Vanderlinden – Local Resident	Residents are expected to live with ugly appearance of powerlines.	[SRK] All potential socio-economic impacts, including impact on sense of place have been included in section D(2) of the BAR as well as the Socio-Economic Specialist Report included in Appendix D.

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
<b>Comments relating to safety concerns</b>		
R van Schalkwyk – Local Resident L Minnie – Local Resident M Elliot – Local Resident S Clegg – Local Resident T Swart – Local Resident L Pieters – Local Resident E van Wyngaardt – Local Resident H Gray – Local Resident M Reid – Local Resident K Steyn – Erstwhile Resident C Gagiano – Local Resident P Alberts – Local Resident R Vanderlinden – Local Resident	Risk and dangers associated with such wires in close proximity to residential homes.	[SRK] Potential safety-related impacts have been addressed in section D(2) of the BAR.
J Baeyens - Capeco	Powerlines poses a health risk for feature residents of Capeco development.	[SRK] Potential health-related impacts during the operational phase have been addressed in section D(2) of the BAR.
<b>Comments relating to noise pollution</b>		
R van Schalkwyk – Local Resident L Minnie – Local Resident M Elliot – Local Resident S Clegg – Local Resident T Swart – Local Resident L Pieters – Local Resident E van Wyngaardt – Local Resident H Gray – Local Resident M Reid – Local Resident K Steyn – Erstwhile Resident C Gagiano – Local Resident P Alberts – Local Resident R Vanderlinden – Local Resident	Residents are expected to live with noise associated with overhead powerlines.	[SRK] Potential noise impacts during the operational phase have been addressed in section D(2) of the BAR.
<b>Comments of a general nature</b>		
J Baeyens - Capeco	Please take into consideration the RoD on our land south of the river.	[SRK] Noted.
J Baeyens - Capeco	Please take into account the impact on erven/ units (people cannot and do not want to live directly under the lines)	[SRK] All potential socio-economic impacts, including impact on sense of place have been included in section D(2) of the BAR as well as the Socio-Economic Specialist Report included in Appendix D.

**Table 3: Comments from Interested and Affected Parties on the Post-Application Draft Basic Assessment Report (DBAR)**

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
<b>Comments relating to the process</b>		
Department of Water and Sanitation (DWS)	According to Section 21 (c) and (i) water uses of the National Water Act 36 of 1998 the proposed activities will require water use authorisation.	[SRK] It is of our understanding that the proposed development (municipal transmission and distribution power line) is exempted from a General Authorisation (GA) in terms of Appendix D2 of the latest GA regulations (August 2016) as per Section 6(2) and therefore a water use authorisation will not be required. The relevant Section 21(c) and (i) forms will be completed and delivered to DWS for registration and the NMBM (proponent) will be made aware of the conditions set out in the latest GA regulations which will be required to be adhered to.
<b>Comments relating to design</b>		
Greyvensteins Inc. – obo – Capeco	The document refers to the installation of an underground powerline as “ <i>not feasible</i> ”. In Section A2 of the post-application draft basic assessment report the 3 options are stipulated together with the cost of installation. What has not been taken into account is the fact that there might be a fourth option which entails the installation of a part overhead part underground powerline.	[SRK] The alternatives that have been proposed as feasible alternatives by the NMBM are the alternatives that have been assessed in this BA process. In the event that the overhead powerline is authorised and NMBM are subsequently persuaded that a portion of that authorised powerline can be installed underground, then an amendment to the environmental authorisation would be required.
Marc Crocker - Capeco	Section A(2) of the Post-Application DBAR briefly explains 3 alternatives and the feasibility thereof. Capeco would like to record that “Route Alignment 2” will not be an option and be omitted from the report.	[SRK] The proponent, the NMBM, together with project engineers identified the project alternatives which are practically feasible and which have been incorporated and assessed in the basic assessment process. As mentioned in the Final Impact Statement, the impacts for both alternatives have been rated exactly the same in all instances, even though a preference for Option 1 has been indicated by the aquatic specialist. Option 1 is therefore indicated at the environmentally preferred option.
Marc Crocker - Capeco	Only considering erf 1226 and the proposed developments. A business model / agreement can be negotiated between the NMBM and Capeco to cover this shortfall of installing cables underground. Capeco would be prepared to cover this shortfall and be reimbursed through rebates on development levies (i.e. rebates on the kVA per unit payable). Capeco formally requests that SRK adds this alternative to the BAR for consideration by the NMBM.	[SRK] The alternatives that have been proposed as feasible alternatives by the NMBM are the alternatives that have been assessed in this BA process. In the event that the overhead powerline is authorised and NMBM are subsequently persuaded that a portion of that authorised powerline can be installed underground, then an amendment to the environmental authorisation would be required.  [NMBM] Building this powerline will be of benefit to the economy of the city as it is built with the aim of meeting the demand of growing new commercial loads and ensuring the reliability of supply to existing businesses and residential loads.

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
<b>Comments relating to the economic impacts</b>		
Greyvensteins Inc. – obo – Capeco	<p>The document refers to “medium economic impact” and low economic impact with mitigating measures on our client’s land. The entire development will have visibility of the overhead powerline and the front row of the Deansgate development will be rendered unsaleable.</p>	<p>[Urban-Econ] It is acknowledged that there are real concerns amongst property owners and developers that HVTLs (High-Voltage Transmission Lines) adversely affect the saleability of properties within close proximity to powerlines. However, as outlined in section 3.2.1 (pp. 19 – 23) of the Socio-Economic Impact Assessment, the prevailing academic literature on the impact of HVTL on residential property does not support the assertion that the presence of overhead powerlines will render properties “unsaleable”. Some studies (Real Property Analytics, 2007) however, do indicate that due to the presence of powerlines, the days that the property is on the market (before being sold) can increase by between 0 and 60 days. This was only observed amongst 50% of respondents in the study.</p> <p>Accordingly, the “medium economic impact” is assigned based on these real perceptions. With mitigation measures, such as the notification of property owners that the likelihood of their property being unsaleable is small, the economic impact of the powerline development is reduced to “low”.</p>
Marc Crocker - Capeco	<p>36 units in the proposed retirement village and 52 units in the Deansgate development would have very high negative socio-economic impacts which have not been conveyed in the DBAR. These 88 units are basically situated directly adjacent to the proposed pylons. It must also be said that the units in the second and third row of both these developments’ market value would also be affected negatively.</p>	<p>[Urban-Econ] As part of the methodology adopted for the study a suburb approach was followed whereby any impacts were quantified at a suburb level rather than at an individual property (or development level). Impacts were subsequently assigned to each suburb based on the percentages of properties within that suburb that had a medium to high degree of visual impact of the proposed powerline (see Section 3.2.2, pp. 24 of the specialist report). The impacts on the market value of individual properties are likely to vary significantly based on a range of factors that cannot be exclusively attributed to the presence of a powerline (e.g. number of rooms, marketing efforts of the estate agent, buyer’s intangible perception of the property). Cumulative suburb values were utilised to address this problem as well as to address the fact that the proposed powerline spans several suburbs and properties and is likely to affect a significant number of properties.</p>
Marc Crocker - Capeco	<p>Mitigation methods related to loss in value of property does not explain how devaluation can be prevented.</p>	<p>[SRK] Mitigation measures given under the <i>Impact on property and land value in the immediately affected area</i> (Impact 11.3) are specifically aimed at the construction phase. Note that additional mitigation measures also relevant are listed under Impact 11.1 - <i>Negative changes to the sense of place</i>.</p>

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
Marc Crocker – Capeco	<p>Our developments will be the most impacted by these pylons and the impact on 1000 residential units will be highly affected. Thus again making our developments undesirable to the end user, which will affect the economy of our city. Your client should calculate what the income would be on rates, taxes and consumption charges for 1000 new households in this area. The municipal revenue generated from these dwellings would be substantial on an annual basis and can only benefit the city.</p>	<p>[Urban-Econ] It is acknowledged that the cumulative impact of the powerline on the proposed additional 1000 residential dwellings will be higher than the impact on existing single residential erven along the proposed powerline route.</p> <p>It is however important to note several factors identified in the Socio-Economic specialist report (see Appendix D of the BAR). Firstly, there is an estimated 75% probability that the proposed powerline will have no impact on the value of individual properties as borne out by the academic literature. Should a negative impact on property values occur, it is highly unlikely to exceed 5% (see Table 3.3, pp. 25 of the specialist report).</p> <p>Secondly, as highlighted in Section 4.3.1 (e) the benefits of the proposed powerline will help to unlock future development in the area. This will accordingly have a strong positive socio-economic impact on the broader Port Elizabeth community.</p> <p>On balance, the positive socio-economic impacts of increased electricity access to the broader community out way the potential adverse impact on properties values of the proposed 1000 residential unit development.</p> <p>[NMBM] Building this powerline will be of benefit to the economy of the city as it is built with the aim of meeting the demand of growing new commercial loads and ensuring the reliability of supply to existing businesses and residential loads. Therefore more jobs will be created and significantly reducing the unemployment rate which plays a role in surging crime rate in the city and lastly the economy will be positively affected.</p>
Marc Crocker - Capeco	<p>Letter by marketing agent for Erf 1226, Fairview expressing concerns regarding marketability. For specific concerns please see Appendix E9 (Annexure J of letter from Capeco).</p>	<p>[SRK] Please see impacts regarding property values and marketability specifically addressed in Section 3.2 and Section 4.2.2 of the Socio-Economic Impact Assessment (attached as Appendix D of the BAR).</p>

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
<b>Comments relating to the visual impacts</b>		
Marc Crocker - Capeco	The dwellings / units which are positioned and orientated to take advantage of the environmentally sensitive watercourse will be the most desirable from a saleable point of view. The sought after positions of these units would be eliminated by the construction of overhead pylons, not only decreasing the value of the property but Capeco would also suffer damages from loss of income by not being able to sell these units.	[Urban-Econ] It is acknowledged that there are real concerns amongst property owners and developers that HVTLs (High-Voltage Transmission Lines) adversely affect the saleability of properties within close proximity to powerlines. However, as outlined in section 3.2.1 (pp. 19 – 23) of the specialist report, the prevailing academic literature on the impact of HVTL on residential property does not support the assertion that the presence of overhead powerlines will render properties “unsaleable”. Some studies (Real Property Analytics, 2007) however, do indicate that due to the presence of powerlines, the days that the property is on the market (before being sold) can increase by between 0 and 60 days. This was only observed amongst 50% of respondents in the study.
Marc Crocker - Capeco	The visual impact assessment carried out by SRK Consulting is quite vague, as a site visit was not conducted and only a desktop study was submitted. As per your Visual Analysis carried out clearly shows that the entire area over a kilometre around the proposed path of the powerlines are highly impacted by the visual impact of these power masts. Not desirable for a densely populated residential area.	[SRK] The viewshed analysis performed in the Visual Impact Opinion (as stated in section 2 of said report) illustrates the area from which the proposed powerline is likely to be visible. It does not take local undulations, existing vegetation and man-made structures into account. Therefore the proposed development might not be visible from every position within the viewshed area, as the development may be obscured by existing infrastructure, vegetation of topographical features. This study was mainly used to inform the Socio-Economic Impact Assessment which required the relevant data.
<b>Comments relating to safety concerns</b>		
Greyvensteins Inc. – obo – Capeco	The health risks associated with overhead powerlines in close proximity to residential development are very well documented; also with previous cases in South Africa, which Eskom lost. The document completely denies this.	[SRK] The statement by the IAP is incorrect. The potential impacts on health due to the close proximity of powerlines have been well researched and addressed in section D of the BAR. Some important literature was also included in Appendix G for additional reading by IAPs and stakeholders. Below is an extract from Impact 4 of the operational phase impacts from the Post-Application DBAR: <i>The proximity of residential and commercial properties to the proposed powerlines has the potential for EMF exposures. Scientific research on the effects of EMFs on public health has not demonstrated clearly the existence of a significant risk, nor has it proven the complete absence of risk. Despite the large number of studies published, several endpoints have not been rigorously examined in a sufficient number of studies. As the methodology of studies improved, the estimates of risk have become lower, making it unlikely that these studies are failing to identify a high risk. Nevertheless, a sufficient uncertainty remains as to the potential of EMF involvement in the causes of cancer. Therefore, even a small risk associated with EMF exposure could have important public health consequences.</i>

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
Marc Crocker - Capeco	<p>We feel that impacts indicated in the DBAR are not a realistic reflection of potential negative effects that EMF's can have and our opinion is that health and safety impacts of the overhead powerlines should be documented as significantly higher than stated. Studies are also mentioned regarding health risks associated with overhead power lines.</p>	<p>[SRK] Impacts described and rated in the BAR and the Socio-Economic specialist study have been done considering a number of credible resources including those reports that are included in Appendix G of the BAR for background purposes. Extracts from studies quoted by the IAP does not mention the voltage of the powerlines in the various studies which makes a large difference with regards to the impact of EMF.</p> <p>The following is an extract from Impact 4 of the operational impacts in section D2 of the BAR:</p> <p><i>The International Commission for Non-Ionizing Radiation Protection (ICNIRP) specified guidelines for EMF exposure in 1998 (subsequently updated in 2010). The guidelines recommend the maximum Electric and Magnetic Fields allowable for limiting EMF exposure that will provide protection against adverse health effects. According to the updated 2010 guidelines the recommended guideline for Electric Field is 5 kV/m for general public (10 kV/m for occupational) and for Magnetic Field 200 µT (1 mT for occupational). An EMF study conducted by Eskom (please refer to Appendix G) specifies the maximum magnetic field at a 132 kV powerline servitude boundary of 15.5 m in width from the centreline as 1 µT and the maximum electric field at a servitude boundary of 15.5 m in width from the centreline as 0.5 kV/m, therefore below the stated guidelines set out by the ICNIRP in 2010. According to data from <a href="http://www.emfs.info">www.emfs.info</a>, the electric and magnetic fields experienced at 12.5 m from the centre line of the proposed alignment will still fall below the guidelines specified by the ICNIRP, therefore the potential for adverse health effects due to long-term exposure to EMF resulting from the proposed powerline is expected to be low.</i></p>
Marc Crocker - Capeco	<p>Safety Specialist for Eskom, Lenny Babulall, stated in a 2005 publication that houses should not be built underneath powerlines as it is a risk to the health and safety of people. Our argument is that the area for the proposed powerlines crossing erf 1226 is very narrow, taking the watercourse into account. Does Eskom also apply this statement if the houses are existing structures before installation of the powerlines are implemented.</p>	<p>[SRK] The letter written by Lenny Babulall (on behalf of Eskom) in 2005 was aimed at people living in informal settlements, within the City of Cape Town, illegally building shacks within powerline servitudes (directly underneath overhead powerlines). The servitude widths (per transmission line voltage) as prescribed by Eskom have been allocated to ensure a safe buffer between the general public and potential impacts with overhead powerlines. No existing structures occur in the proposed powerline servitude.</p>

Interested and/or Affected Party	Issue raised	Response (by SRK unless otherwise specified)
Marc Crocker - Capeco	In recent years there have been many cases of the public against Eskom's installations of overhead powerlines. Ref: Residents of Midrand North in Johannesburg who won their case against Eskom.	[SRK] To our knowledge, the only case Eskom has lost is the case referenced by the IAP. In that specific case, Eskom mainly lost due to procedural errors. Information available suggests that Eskom didn't follow the correct public participation process (they notified the residents but did not allow for concerns to be raised). Also, the powerline infrastructure was constructed outside of their servitude.
<b>Comments of a general nature</b>		
Greyvensteins Inc. – obo – Capeco	The document mentions “low density residential developments”. 30 – 65 units will be built per hectare right under the overhead powerline, on two sides of a stretch of 700m. Surely this cannot be construed as low density.	[SRK] The Socio-Economic Impact Assessment, under Section 2.4.1, states the following: <i>“In addition to the existing investments in the area there are also a number of planned developments for the immediate area surrounding the proposed powerline”, “Of these proposals, the two most significant are the developments on erf 1226 and erf 4033. The latter development proposes the development of ten (10) separate medium density residential clusters, a retirement village and access roads on the north-eastern part of erf 1226.”</i>
Marc Crocker - Capeco	The DBAR refers to medium to low impacts over the path of the proposed lines related to the socio-economic impacts. For the majority of the path the pylons pass single residential erven where these perceived impacts might be the case. Erf 1226, Fairview on the other hand will be a densely populated area comprising of about 1000 residential dwellings which we consider all socio-economic to be negatively high.	[Urban-Econ] It is acknowledged that the cumulative impact of the powerline on the proposed additional 1000 residential dwellings will be higher than the impact on existing single residential erven along the proposed powerline route. It is however important to note several factors identified in the Socio-Economic specialist report (see Appendix D of the BAR). Firstly, there is an estimated 75% probability that the proposed powerline will have no impact on the value of individual properties as borne out by the academic literature. Should a negative impact on property values occur, it is highly unlikely to exceed 5% (see Table 3.3, pp. 25 of the specialist report). Secondly, as highlighted in Section 4.3.1 (e) the benefits of the proposed powerline will help to unlock future development in the area. This will accordingly have a strong positive socio-economic impact on the broader Port Elizabeth community. On balance, the positive socio-economic impacts of increased electricity access to the broader community out way the potential adverse impact on properties values of the proposed 1000 residential unit development.



<b>Interested and/or Affected Party</b>	<b>Issue raised</b>	<b>Response (by SRK unless otherwise specified)</b>
Marc Crocker - Capeco	To conclude, Capeco will not permit overhead powerlines to cross over erf 1226, Fairview, which will be a densely populated residential area. We believe that the underground option is the only option for our property and that the shortfall can be negotiated between the parties positively in the best interests of the residents of this city.	[SRK] Noted. The shortfall option which you mention has not been evaluated within this Basic Assessment Report. This does not preclude Capeco from further discussions with the NMBM with regard to this alternative which will have to be handled as an amendment should the current proposal be authorised.