

# COMMENTS AND RESPONSES REPORT (CRR)

SUPPORTING THE

## FINAL BASIC ASSESSMENT REPORT (BAR) FOR THE PROPOSED RESIDENTIAL DEVELOPMENT (COMET EXT. 8) IN BOKSBURG

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February 2014

SEF Ref No. 505052

GDARD Ref No. Gaut: 002/13-14/E0090

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Comment Raised	Interested & Affected Party	Date & Method of communication	Response
<b>1. COMMENTS RELATED TO MUNICIPAL SERVICES</b>			
<p>1. The pipes are old and have not been replaced in about 50 years.</p> <p>2. Electrical cables are lead armoured cables which are not acceptable according to the new electrical regulations and by laws.</p> <p>3. Sewage pipes are old and not adequate for it to handle the volumes of sewage when more people are in this area.</p>	Mr. Clive Morris	25.08.2013 by email	<p>Comments noted.</p> <p>The capacity of the council to provide the services has been confirmed through the Capacity Assessment study by GLS Consulting, as indicated in the Services Report attached on the Draft Basic Assessment Report. The Ekurhuleni Metropolitan Municipality (EMM) requested that GLS be consulted to determine if the existing sewer network has capacity to accommodate the sewer flows.</p>
The current water supply and sewage systems are old and depleted. The residents are astounded that the town council would approve such a development, considering that the current system is hardly able to service the current residents.	Mr Deon Swart	23.08.2013 by email	<p>The EMM had indicated that there is one connection for the existing 600 mm diameter water main located on the western boundary of the site. It is on such bases that it was anticipated that there is capacity. The capacity has been confirmed by the report produced by GLS Consulting.</p>
Will the council have capacity to provide the water, sewer and waste removal services in the suburb?	Mr John Lindsay	13.08.2013 by fax	
<p>1. Sewage system will not cope.</p> <p>2. Demand on electricity?</p> <p>3. Water pressure is already bad. What will happen now with all these extra houses?</p>	Mr Malcolm Brown	25.08.2013 by email	<p>The following is recommended by the GLS Consulting's Sewer and Water Services Reports:</p> <ul style="list-style-type: none"> <li>• The development site can be incorporated into the Madeley low pressure water distribution</li> <li>• The current Madeley reservoir has sufficient spare capacity to accommodate the proposed development</li> <li>• No upgrading to any booster pump stations or water towers are required</li> <li>• No upgrading to any existing affected bulk pipes are required</li> <li>• The proposed connection points to the existing system are to the existing 75Ø pipes in the adjacent Plantation Township at points A, B and C as indicated on figure A of the Sewer Services Report.</li> <li>• The proposed development site can be incorporated into</li> </ul>
Have the existing old sewer and stormwater infrastructure been taken into account? Plantation is over 100 years old.	Mr Mark Bush	26.08.2013 by email	
<p>1. Sewage cannot be joined to present system as stated in the EIA. Residents often experience blockages i.e. Hillow and Ash, Hospital Road, View Point Farm area etc.</p> <p>2. Residents are not able to shower between 6am – 8am and 6pm – 9pm because of low pressure.</p> <p>3. Water pipes on Rainway Road are very old and continually leaking fountains of water.</p> <p>4. Storm water/ rain run-off if already a problem.</p> <p>5. The floods down Trichart Road on 2012/11/10</p>	Mrs. Jean Mary	23.08.2013 by email	
Have existing services, ie:- sewer drainage lines on the	Kenneth and Joan	23.08.2013 by email	

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<p>proposed development already serving the suburb of Plantation, been taken into consideration and the protection of these once excavation takes place? (There are sewer lines under proposed stands 95 and 98 that I know of.)</p>	<p>Mclachlan</p>		<p>the Vlakplaats WWTP sewer drainage area</p> <ul style="list-style-type: none"> <li>• No sewage pump stations are affected by the proposed development Although certain large diameter sewer pipes downstream of the development may currently be experiencing capacity problems, none of these problems were caused by the possible increase in sewage flow from the proposed development and the effect of the additional flow from the proposed development on the spare capacities of these pipes are insignificantly small.</li> <li>• No upgrading of any existing bulk sewer infrastructure is recommended for the development to proceed. Planning for the upgrading of the mentioned main outfall sewers, however, is recommended to commence as soon as possible.</li> <li>• According to the as-built network sewer information available, the proposed development site has already been serviced with internal sewers.. If the actual existence of the internal network sewers can be confirmed, we hereby confirm that the internal sewer network has sufficient capacity available to accommodate the sewage flow from the proposed development</li> <li>• If the internal sewer network does not exist, we hereby confirm that the existing network pipes in the adjacent Plantation Township have sufficient spare capacity to accommodate the additional sewage flow from the proposed development</li> <li>• Due to the general cadastral layout and natural topography of the area no provision has to be made for any further future developments to drain through the site.</li> <li>• Further extension of the Waterval WWTP is a critical requirement for all future development within its catchment area.</li> </ul> <p>According to the Electric Engineering Services Report produced by Motle Consulting Engineers, for the development</p>

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			<p>to be connected electrically, an 11 kv electrical switching substation has to be built. Another option would be to establish a cable ring network through the development with no switching substation built. An application is still to be submitted to EMM for approval.</p> <p>The existing infrastructure will be taken into account throughout the planning phase of the development and measures will be in place to ensure minimal or no damage is done during construction. The connections will be code in accordance with the municipal requirements and specifications.</p>
<p>It should be noted that council has to continuously work and repair both the sewage and water systems in Plantation and it takes them months to do so, even though pot holes form in the road causing the road to collapse. The infrastructure of the local government cannot currently provide an efficient supply of electricity, sewerage, water and other services. Therefore how can it be considered to add an additional 249 houses plus 60 units when the current capacity is strained and resources are limited?</p>	<p>Mr Rossouw va Den Berg</p>	<p>23.08.2013 by email</p>	<p>Please note comment above</p>
<p>Please keep Rand Water informed regarding the following aspects:</p> <ul style="list-style-type: none"> <li>• All traversing along and over Rand Water pipelines; and</li> <li>• Possible leaks from other services that could cause ground water stability to change.</li> </ul> <p><i>(In addition, the Standard Conditions for Crossing of Rand Water's Services were provided)</i></p>	<p>Mrs Mpati Mpshe</p>	<p>19.08.2013 by email</p>	<p>Comment noted, thank you..</p>
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Power;</li> <li>• Water;</li> <li>• Sewage;</li> </ul>	<p>Mr D.R. Snow</p>	<p>25.08.2013 by email</p>	<p>Comment noted, please refer to comment on the first page</p>

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<ul style="list-style-type: none"> <li>• Traffic;</li> <li>• Public filter; and</li> <li>• Pollution</li> </ul>			
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Water and sewage services; and</li> <li>• Increase in traffic.</li> </ul>	Mr. Rob O'connor	24.08.2013 by email	Thank you, please refer to response on page 1.
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Water pressure;</li> <li>• Sewage;</li> <li>• Traffic;</li> <li>• Schools;</li> <li>• Flood land; and</li> <li>• Storm water drains</li> </ul>	Mr Rossouw va Den Berg	23.08.2013 by email	
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Water;</li> <li>• Sewage;</li> <li>• Roads;</li> <li>• Increase Volume of traffic and people;</li> <li>• Increase crime; and</li> <li>• Devaluation of properties.</li> </ul>	Pastor Lucas Pienaar	24.08.2013 by email	
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Sewage system not in line with homes in the area.</li> </ul>	Mrs I. Van Tonder	25.08.2013 by email	
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Safety of residents;</li> <li>• Concerns that water pressure may decrease due to proposed development;</li> <li>• Concerns regarding municipal services (sewage, water supply and electricity supply); and</li> <li>• Security of the residences while construction works in progress.</li> </ul>	Mr Harold Wienand	23.08.2013 by email	

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<b>2. COMMENTS RELATED TO TRAFFIC AND ROADS</b>			
<p>It is noted that the traffic survey deals with passage of the additional vehicles on the suburban roads in Plantation. It concludes that the roads are capable of handling the additional traffic. It retains the small circle at the junction of Comet Road and Palm Avenue as a solution to the already existing difficulty of exiting Plantation. The residents doubt this solution, particularly as it is expected that the new low cost housing will roughly double the present traffic load in the suburb. Their concerns are on record in the minutes of S.E.F. meetings as discussed above.</p> <p>The traffic survey needs to consider the substantial traffic originating from 123 low cost houses especially at peak times within the confines of the development. As the site map clearly shows, the internal roads are narrow (Carriage way of 5.5 meter) and 3.5 meter wide cul de sacs. A typical small car has a width of 2 meters, while larger vehicles are considerably wider. Parking of cars in front of the low cost houses will not be possible, thus preventing visitors with cars. It seems likely that two relatively large vehicles moving in opposite directions will have difficulty passing each other. Even more seriously, it appears doubtful that the large rubbish collection vehicles employed will succeed in negotiating these narrow roads together with the movement of residents' cars. Similar concerns involve emergency vehicles such as fire-engines and ambulances. Such narrow roads may suit developments with relatively few houses, but not one involving 123 houses.</p>	Prof. JD Comins	25.08.2013 by email	<p>Comments noted.</p> <p>In the Traffic Impact Study (TIS) undertaken by ITS Engineers in May 2013, it is acknowledged that the existing road network in currently operating close to its capacity. The report then recommends that the upgrades are made to address the increasing difficulties as well as the traffic volumes that will be come with the proposed development.</p> <p>According to the Layout Plan (Appendix C) of the Draft Basic Assessment Report, the width of the internal roads ranges from 10.5m to 18m; and the 6m wide <i>cul de sacs</i>. Such road width should be enough to accommodate the vehicles of any size going both directions. The parking will be done according to Ekurhuleni Metropolitan Municipality Development Planning guidelines.</p> <p>The TIS report states the dates and time on which the survey was undertaken i.e. AM and PM peak on Tuesday on the 5th of March 2013. A growth rate of 3% per annum was used to estimate the year 2018 traffic demand. A trip generation rate of 1.1 per residential unit accordance to the South African trip generation manual was used to calculate the additional trips. The 123 residential unit development will generate an additional 270 vph during the morning and afternoon peak hour with 101vph in the peak direction.</p> <p>Main access: corner of Comet and Palm Street. Two additional access points via Ash/Pine Streets and Beach Street.</p>
We do not want our roads to be used more than they are.	Mr Alf Bush	23.08.2013 by email	The proposal of three access points is due to that it will prevent that traffic be concentrated in a single location. Traffic from the proposed development will be distributed to the three proposed accesses. The construction vehicles will need to
I request for proof of when and where was the Traffic Impact undertaken. A previous study cannot be used for reference.	Mrs Alison Smith	25.08.2013 by email	

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<ol style="list-style-type: none"> <li>Roads in Plantation are not designed for high traffic volumes and heavy vehicles.</li> <li>Roads are designed for no more than 2 ton vehicles.</li> </ol>	Mr. Clive Morris	25.08.2013 by email	adhere to the roads rules and conditions that will be stipulated by the municipality and the environmental authorization to ensure safety for all the affected road users.
Have access roads from northern side via traffic lights in the intersections located on Comet and Rondebult Roads as well as on Rietfontein and Main Reef Roads.	Mr Douglas Truter	26.08.2013 by fax	The road signs and controls (including the traffic lights) will assist in terms of challenges that may be encountered with the increase in the number of pedestrian traffic regarding the road crossings and so on. As recommended in the TIS report, the construction of public transport laybys is needed to accommodate the public transport users and to avoid the disturbances of other road users during pickups and drop-offs.
<ol style="list-style-type: none"> <li>Traffic in Beech Street/ Palm Street: the roads are old and there is regular water pipe bursts. More traffic will cause damage and traffic jams as the roads are narrow.</li> <li>Access roads to development should not be through Plantation. Additional traffic will disturb the existing peace and quietness in the area as well as the current activities on the roads i.e. children on bicycles and dog walkers.</li> </ol>	Ms Elise van der Schyff	21.08.2013 by fax	The worst case scenario was used to determine the impact of the proposed development on the surrounding road network. The combined horizon 5-year (2018) with a growth of 3% was analyzed and the outcome of the analysis indicated that <u>the developer will be responsible to implement road upgrades to accommodate the additional development traffic.</u> Traffic surveys were conducted by ITS Engineers during the morning and afternoon peak hours on Tuesday the 5 <sup>th</sup> of March 2013 and six intersections (Main Reef / Pretoria Rd, Main Reef / Rondebult Rd, Rondebult Rd / Pretoria Rd / Comet St, Rondebult Rd / Middel Rd, Palm St / Comet St) within the study area were included as part of the traffic impact study.
<p>Insufficient attention has been paid to the traffic this will involve the following:</p> <ul style="list-style-type: none"> <li>It will be difficult for the ambulances to get to hospital (and the number of patient will increase dramatically);</li> <li>The vast increase in the number of vehicles.</li> </ul>	Mr Deon Swart	23.08.2013 by email	
<ol style="list-style-type: none"> <li>We need written confirmation of when and where was the Traffic Impact Study undertaken.</li> <li>Alternative access must be found should the development proceed.</li> </ol>	Mr John Lindsay	13.08.2013 by fax	
<ol style="list-style-type: none"> <li>Palm Avenue will not cope with incoming and outgoing traffic.</li> <li>Access right in front of my house will disturb peace because of constant traffic in and out.</li> </ol>	Mr Malcolm Brown	25.08.2013 by email	
<ol style="list-style-type: none"> <li>Are the existing internal roads planned for the increase in traffic that will result from the proposed development?</li> <li>Traffic is already a huge problem every morning and</li> </ol>	Mr Mark Bush	26.08.2013 by email	



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evening on Rondebult Road. It will not cope with more people.			
There will be massive increase in traffic into the residential area, which is already under pressure at circle.	Mr. Nils R. Bjornstad – Viking Projects	24.08.2013 by email	
It's difficult to get out of Palm and into road leading into Rondebult (traffic light at this point) in the morning.	Mrs. Jean Mary	23.08.2013 by email	
<p>1. I am against this development based on the following:</p> <ul style="list-style-type: none"> <li>• There will be a significant increase in traffic flow in Plantation where the existing infrastructure has been neglected and will not cope with the new development. As it is at the moment, road markings in Plantation are virtually non-existent. Stop and yield signs have been stolen in certain places and never replaced. Added to the problem of the speeding cars, this poses a road safety risk, not to mention noise and fumes;</li> <li>• The development would cause a lot of pedestrian traffic by way of domestic workers coming from the station into the area, not to mention those arriving by taxis. Before the mine housing was demolished, there was a lot of traffic, speeding cars, littering, unsavoury characters and various crimes. With this development, it will only increase;</li> <li>• The existing infrastructure will not cope with the increase in population and traffic demands; and</li> <li>• Entrance and exit points must be moved to Rondebult road and possibly Hospital road</li> </ul> <p>2. If the development does go ahead, it is proposed that the entrance and exit points be moved to Rondebult road and possibly Hospital road.</p>	Mrs Pricilla Smith	26.08.2013 by email	<p>Please note the comment above.</p> <p>The outcome of the analysis indicated that the developer will be responsible to implement road upgrades to accommodate the additional development traffic. With the road upgrades in place the analysis indicated that the road network will be able to accommodate the additional development traffic at acceptable level of service (LOS) and delays. Public transport users were address in paragraph 16 of the traffic impact study and the development will require to provide taxi-layby at the Comet Rd / Rondebult Rd intersection. Traffic calming measures can be considered in future if speeding cars are posing a problem. The accesses to the development were discussed in the traffic impact study under point 8 and it deemed to be adequate.</p>
<p>1. There will be extra pedestrian traffic from station as well as taxis going through plantation.</p> <p>2. The construction vehicles coming through Plantation</p>	Mr Harold Wienand	23.082013 by email	

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<p>will pose danger to the residents.</p> <p>3. Transport and educational facilities for the new residences. Existing schools are full.</p> <p>4. Traffic congestion in plantation (220 units and extra 220 cars – no outlets).</p>			
<p>We hereby advise that we object to the proposed Comet Ext 8 township, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Increases in traffic along Palm Avenue will have an undesirable influence on the homes in this street, and impact on the residential nature of this precinct;</li> <li>• Access to the township is undesirable, and in particular the build-up that will be caused in the vicinity of the traffic circle; which indicates that main access is proposed at this point, additional access is shown proposed from Pine street. This will result in isolating the residential block of erven between Palm Avenue and Pine Street and result in unacceptable traffic patterns through the area;</li> <li>• The 30m wide servitude, parallel to Rondebult Road, should be considered as an additional entrance into the residential 4 (1.25 ha); and</li> <li>• The high density accommodation planned for will also add a large volume of traffic to the area.</li> </ul>	Kenneth and Joan Mclachlan	23.08.2013 by email	
<p>With the additional traffic from the proposed project, the roads will certainly not cope and will be a danger to all who have to use them.</p>	Mr Rossouw va Den Berg	23.08.2013 by email	Please see response above.
<p>The following issues must be considered:</p> <ul style="list-style-type: none"> <li>• Traffic Congestion.</li> </ul>	Mrs I. Van Tonder	25.08.2013 by email	
<b>3. COMMENTS RELATED TO HOUSES AND PROPERTY VALUES</b>			
<p>1. The building of low cost housing will diminish the property values of the existing Plantation houses and particularly those in close proximity to these structures.</p>	Prof. JD Comins	25.08.2013 by email	<p>Comments Noted.</p> <p>The proposed residential development will compose of the</p>

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<p>This has been confirmed by Mr Abri Viljoen, a leading estate agent with years of experience with Plantation properties. It is grossly unfair to residents of Plantation whose loyalty to Boksburg extends in many cases to their lifetimes and in some cases to generations and whose property represents a major part of their assets. They now find that preference is given to the proposals of developers and their advisors whose only interest in the city is their profit motive.</p> <p>2. The BAR does not provide architectural sketches or photographs to illustrate the proposed low cost housing in Residential 1 or that in Residential 4. It should be simple to provide the characteristics of the proposed housing such as number of bedrooms, kitchen, lounge, bathroom etc. together with the proposed cost of a typical house and a sectional title apartment. The lack of such information is unfair to the residents of Plantation especially those whose homes are adjacent to these planned structures. Without this information being provided and the public being given the opportunity to comment, major damage can ultimately result to the aesthetic appearance of the suburb without any means of recourse by residents.</p> <p>3. There are serious concerns regarding the stand sizes of the low cost dwellings and the density of these. The BAR states that the site for the houses is 3.39 Ha (33900 m<sup>2</sup>). The number of houses in Residential 1 is 123. The stand area for each house given by S.E.F documentation is 240 m<sup>2</sup>. This is much smaller than the norms of both South Africa and Namibia in dealing with low cost housing. Examples of such housing in Cosmo City, Vosloorus and Thembisa show stand sizes of approximately 450 m<sup>2</sup>. In Payneville (Springs) it is noted that the cheapest low cost house built by developer Eya Chesa has a stand area of 308 m<sup>2</sup>. The regulations drawn up by the Namibian Government for</p>			<p>rental units of the following quantity and sizes in the draft Basic Assessment Report:</p> <ul style="list-style-type: none"> <li>Residential 1 consisting of 123 detached houses (240m<sup>2</sup>) each, on erven 3-40 and erven 42–126, the total size is approximately 3,39 ha; and</li> <li>Residential 4 consisting of residential dwelling units at 60 units per hectare on erven 1 &amp; 2 with a total size of approximately 2.04 ha.</li> </ul> <p>Please refer to Appendix C of the Basic Assessment Report for the drawings.</p> <p>The stand size does not have an effect on the type and quality of the house which the developer can construct on the stands. There are many other developments with similar stand sizes. <u>Most of the stands are larger than 240m<sup>2</sup> and range up to 400m<sup>2</sup>.</u></p> <p>The Western Cape Spatial Development Framework states that 300m<sup>2</sup> is the minimum erven size for the areas zoned for Single residential and Group housing. It further states that there is an exception for areas where smaller ervens exists.</p> <p>Having stated the policy stipulations, it should be noted that the proposed development is not in contradiction and does not intend to disobey any South African legislation or policy. The National Housing Policy of South Africa and the Gauteng Provincial Spatial Development Framework does not specify the minimum Erf or erven size for housing developments or low cost housing.</p>

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<p>its National Housing Policy states "Plots for low-income housing should not normally be less than 300 square meters". "The guideline for minimum erf sizes recognizes the need for adequate space in order to accommodate extended family structures and play areas for children". The high stand densities and small stand sizes proposed in the BAR suggest a standard of house considerably lower than those discussed above. They will not provide appropriate living standards for the families intended as occupants. Children will be deprived of suitable space for recreation within the house stands and thus will be expected to use the streets. This cannot be good policy and needs revision.</p> <p>4. An example of an acceptable high density housing development already exists in Plantation. This is Chelsea Lane situated between Palm and Cedar Avenues. The housing has attractive architecture that blends into the style of Plantation houses. Although the stands are small they provide space for gardens, parking for cars and a pleasant environment. At a previous meeting these matters were presented to the then developer and S.E.F. and there was a commitment to examine the suggestions. The BAR makes no mention of this alternative suggestion. Reasons need to be supplied as to why alternative low cost housing is not considered.</p>			
<p>Walling between new development and our present must not reduce the value of our homes.</p>	Mr Alf Bush	23.08.2013 by email	There will be 123 free standing units/ervens and 123 apartments. This is a total of 246 units.
<p>1. On the map, the 249 stands indicated in the report is not shown; 123 stands are shown; where is the balance of these detached houses going to be built? This clearly indicates that the dwelling units will not comply with the ambience of the existing dwellings in Plantation and consequently a serious devaluation of</p>	Mr John Lindsay	13.08.2013 by fax	<p>The height will be 3 floors/ storey. The 123 erven will be full title and there will be 123 sectional units.</p> <p>Please refer to the perspectives attached as Appendix C to the Basic Assessment Report.</p>

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<p>assets together with a concomitant rise in criminal activities.</p> <p>2. How many floors will Residential 4 units have?</p> <p>3. Are the dwellings full or sectional title?</p> <p>4. The residents would like to see a plan of these dwellings as well as the perspectives. These dwellings need to have the same aesthetics of the adjacent township.</p> <p>5. The residents of plantations strongly object to the development of sub economic units with access through Plantation suburb, resulting in devastation of property and an escalation in the crime rate.</p> <p>6. If the proposal goes through, an 8ft wall needs to be erected to surround the proposed suburb.</p>			
<p>1. What type of housing is this going to be?</p> <p>2. What market will it be aimed at?</p> <p>3. What impact is it going to have on the current value of or properties?</p>	Mr Malcolm Brown	25.08.2013 by email	<p>The target market is the middle and high income groups. The types of houses will be free standing and apartments.</p>
<p>1. The plantation residents require that the proposed plans be viewed and approved by them.</p> <p>2. What market will be targeted in the proposed development?</p> <p>3. The residents will not accept any development that will have a negative effect on their property values.</p> <p>4. The residents will not accept low cost housing built right next to their houses.</p>	Mr Mark Bush	26.08.2013 by email	
<p>There are no house plans. What types of houses are to be built? The houses size sound like the NP houses.</p>	Mrs. Jean Mary	23.08.2013 by email	
<p>1. There is a concern that the low cost housing will lower the tone of the neighbourhood and decrease houses value.</p> <p>2. What are the values of the 123 houses?</p> <p>3. Can these houses be purchased or are they for rental</p>	Mr Harold Wienand	23.082013 by email	<p>The apartments are estimated to be between R450 000 and R650 000; and the houses are estimated to be between R700 000 and R1.1 million</p>

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<p>only?</p> <p>4. Would the proposed residential component of the development cater for: Lower Income Groups, Middle Income Groups and/or Higher Income?</p>			
<p>1. The Basic Assessment Report on page 9, refers to medium to high density residential to the south of the proposed development, this is surely only - Low density residential!</p> <p>2. We have an entrance gate on the western side of Erf 933 which we use for access (to Erf 933) for a caravan, boat and trailers, and cars. We also use this entrance for visitors' cars as well, for security reasons. Comet extension 8- Residential 1, proposed stand 92, is parallel / adjacent with Erf 933, Plantation, and extends to the western point of Erf 933. This configuration makes it extremely difficult / almost impossible to drive into the western gateway of Erf 933, as we have always approached the gate from the old mine road, which is now your property. I am requesting that you consider our difficulties and position your boundary wall partially northwards or kink it slightly as requested on the Plan No 2 (attached on the comments) so as to accommodate access enjoyed historically to date. Alternatively, proposed stand 92 becomes smaller, gives a percentage of the proposed sqm to stand 93 and then stand 92 is zoned "special" and landscaped to beautify the main entrance into the proposed development (which would also alleviate the necessity for a right of way servitude and southern boundary wall move). A right of way servitude would possibly need to be registered to formalize this agreement if this route is followed or merely a letter of agreement in this regard will suffice.</p> <p>3. Certain residential properties adjacent to the township could be detrimentally affected by the proposed</p>	<p>Kenneth and Joan Mclachlan</p>	<p>23.08.2013 by email</p>	<p>A copy of the Draft Environmental Management Programme is part of the final Basic Assessment Report (Appendix H). An Environmental Control Office will be appointed after the decision has been taken by the competent authority, should the environmental authorisation be positive.</p>

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<p>development, unless suitable development controls are introduced to ensure that the land uses proposed and developed on the site are compatible with the existing low density residential area. The controls as proposed in the application are inadequate in this regard.</p> <ul style="list-style-type: none"> <li>• Control 1: The building line adjacent to existing Erf 933 on the common boundary, not to be less than 7.5m, relaxed to a minimum of 5m if required by owner, and then agreed by all adjoining neighbours.</li> <li>• Control 2 (height restriction): The proposed stands 92, 93 94, 95, 98 and 99 are to be height restricted to single storey houses, so as to alleviate all possibility of overlooking and privacy infringement which will drastically reduce the value of existing stand 933 in Plantation, single storey in this area would create the required buffer zone necessary to be in keeping with the existing single storey houses along this specific edge of Plantation. A sectorial diagram is to be produced to illustrate lines of sight into the entertainment patio of erf 933 once the SDP for the proposed development has been completed and submitted.</li> <li>• Control 3: That the most southern block of apartments closest to Plantation, in the Res 4 (1.25ha) area be height restricted to 2 storeys. ( both control 2 and 3 would be required from an aesthetic point of view anyway to create a friendly entrance way into the new development)</li> <li>• Control 4: Smells and rodents associated with a refuse site that may be established on the east and south sides respectively of the res 4 development both 0.79ha &amp; 1.25ha portions) be properly screened and measures put in place as</li> </ul>			

Comment Raised	Interested & Affected Party	Date & Method of communication	Response
<p>per the NBR, SABS 0400.</p> <ul style="list-style-type: none"> <li>• Control 5: Proper explanation is to be given as to the size of the proposed houses as the SEF document REF NO 504052, dated 26 July 2013, refers to 240sqm houses whereas the services agreement document refers to 240 sqm stands, which is the correct version?</li> <li>• Control 6: 24 hour Specific Security ( not general site security ) is put in place by the developer that reports to the Plantation homeowners, and specifically monitors the southern boundary of the proposed development, as page 24 of the SEF document under “table 4: increased security risk” makes specific reference to the probability of this as being “ highly likely “.</li> <li>• Control 7: Landscaping is installed as per the approved SDP, and the developer attempts to maintain as many of the existing trees as possible that fall outside the footprint of potential houses (these have been photographed and positions identified by us ).</li> <li>• Control 8: It is stated on page 15 of the Basic Assessment Report that Dust emissions that are created during construction “will be mitigated through the implementation of the EMPr.” Please could a copy of the EMPr be made available for perusal, and the details of the appointed environmental control officer be made available.</li> <li>• Control 9: Due to the potential southern boundary of the proposed stand 92 being fenced or walled the access into the roller shutter gate of rf 933 will be almost impossible for vehicles to access this property as enjoyed historically in the past at this western entrance to erf 933. Therefore please consider the request made in “letter of request”</li> </ul>			



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<p>dated 22.08.2013.</p> <p>4. We hereby reserve our right to expand on the points raised above, in order to elucidate our objection when it is heard by a Tribunal of the City Council.</p> <p>5. Should these matters not be considered, especially “control 2, 3, 6, 8, and 9” mentioned above, we will have no option but to submit an appeal to the Townships Board.</p>			
<b>4. COMMENTS RELATED TO CRIME</b>			
<p>The BAR indicates a substantial increase in dust and crime during the construction period. The developers need to describe measures to be adopted to ameliorate these aspects. The welfare of the residents must be taken into account.</p>	Prof. JD Comins	25.08.2013 by email	Please refer to the Environmental Management Programme (EMPr) prepared as an addendum to the BAR. The EMPr is a legally binding document and will be audited by an Environmental Control Officer during the construction phase of the development.
<p>Pedestrian traffic will increase considerably on the two roads and that will result in the increase of crime.</p>	Mr Alf Bush	23.08.2013 by email	Please refer to the mitigation measures provided in the BAR. Consideration should be given to the current crime risk of vacant land next to existing residential housing units. Dumping and evidence of cable theft and stolen goods is present on the site meaning that it is currently an ideal spot for criminal activities taking place within the area. The formalisation of the site will ly lower the risk to the area and residents.
<p>Increase in pedestrians walking in and out of entrances will impact on crime.</p>	Mr Malcolm Brown	25.08.2013 by email	
<b>5. COMMENTS RELATED TO PUBLIC FACILITIES</b>			
<p>The three storey apartment blocks do not appear to provide recreational space for families and children. Playgrounds which are safe and within sight of parents need to be part of the development plan. As these blocks will be the most prominent first impression of Plantation, it is necessary to provide information of their architecture and appearance for public comment.</p>	Prof. JD Comins	25.08.2013 by email	<p>Comments Noted</p> <p>There will be a Public Open Space of 2.98 ha reserved to the northern side of the development that will create a green space for children and residents of the Comet Ext 8.</p> <p>As part of the Site Development Plan for the apartment blocks open spaces/ play areas / landscaping will be dealt with. This follows after approval of the township.</p> <p>The size of the development 246 units does not warrant a</p>
<p>1. Schools in the area are already overcrowded.</p> <p>2. Playground area for the children.</p>	Mr Alf Bush	23.08.2013 by email	

Comment Raised	Interested & Affected Party	Date & Method of communication	Response
There are not enough schools in the area to accommodate children who move into the area.	Mr Malcolm Brown	25.08.2013 by email	new school.
There is lack of infrastructure to deal with an increase in population.	Mr. Nils R. Bjornstad – Viking Projects	24.08.2013 by email	
No land set aside for recreation facilities and schools. Are the children going to play in View Point compost and old mining areas or waste?	Mrs. Jean Mary	23.08.2013 by email	
I purchased my home in this area amongst other reasons due to the low traffic volumes and quietness of the area. Our children are currently able to play and ride their bicycles in our streets and we can walk our dogs in the area, with little risk of traffic. This will all change should the proposed development be approved which would mean an increase in vehicles and pedestrians moving through the area.	Mr Rossouw va Den Berg	23.08.2013 by email	
<b>6. COMMENTS RELATED TO PUBLIC PARTICIPATION PROCESS</b>			
It is incumbent on S.E.F to place site notices in the suburb informing affected parties of the development. It is requested that the position of the site notices is made known by S.E.F. My personal investigation and questions to residents living close to the planned development did not produce confirmation of this statutory requirement.	Prof. JD Comins	25.08.2013 by email	Two site notices were placed at the corner of Ash and Hospital Roads as well as at the corner of Palm and Comet on 26 July 2013. Please see photos on the 'Proof of Site Notices' (Appendix 5)
Not all residents received communication of your report, as per your I&AP's database, why?	Mrs Alison Smith	25.08.2013 by email	Residents including state departments for which the information was available from the previous studies were directly contacted (a total of 75 persons were notified). Other residents were notified through the site notices and a newspaper advert published on Boksburg Advertiser News on 26 July 2013. The Ward Councillor was also directly notified of the project, which serves as the communication mechanism in the area. However, people who which to be part of the process has also been added to the database and
There was little or no communication to residents of Plantation.	Ms Elise van der Schyff	21.08.2013 by fax	
There was a consultation process nearly two years ago and have heard nothing until the current process. At that time capias and detailed objections were made which were not addressed.	Mr. Jackie Dover	24.08.2013 by email	
All steps needs to be communicated regularly to all relevant parties.	Mr John Lindsay	13.08.2013 by fax	

Comment Raised	Interested & Affected Party	Date & Method of communication	Response
I have not been notified at all.	Mr. Rob O'connor	24.08.2013 by email	will be notified of the availability of the Final BAR report.
No notification was received. One notice on a pole in Hospital Road facing Blood Bank appeared on around the 18th of August. A notice on the B.A. process appeared on 21 July (newspaper not always delivered).	Mrs. Jean Mary	23.08.2013 by email	It must be noted that this is a new project and that a new application is underway, which is not related to the first process.
There was no communication during the public participation process	Mrs I. Van Tonder	25.08.2013 by email	
Never received any documents on public participation process.	Pastor Lucas Pienaar	24.08.2013 by email	
<ol style="list-style-type: none"> <li>1. No letter was received during the public participation process.</li> <li>2. There was no stakeholder meeting to discuss issues with the residents of Plantation.</li> <li>3. In 2009 SEF invited Plantation residents to attend a public meeting to discuss Draft EIA report; but nothing was done this time.</li> </ol>	Mr Harold Wienand	23.082013 by email	
Written notice as would be expected for this sort of development is given to the adjacent neighbours, is this still to occur?	Kenneth and Joan Mclachlan	23.08.2013 by email	People were notified through a newspaper advert, site notices, emails, sms, fax and postage where available.
<ol style="list-style-type: none"> <li>1. It is the first time I hear of the project.</li> <li>2. One would think that the local government would investigate and consider all the local residents and interview them accordingly. This was never done and we object very strongly to this lack of communication, which clearly has legal implications for the developers.</li> </ol>	Mr Rossouw van Den Berg	23.08.2013 by email	Please note that this is not a government project but a private development project.
<b>7. COMMENTS RELATED TO ECOLOGY</b>			
1. The seasonal wetland is referred to as a "dry pan". This statement was no doubt created by the conditions in March 2013 when the latest survey was carried out, but as discussed above is certainly not representative of summer conditions each year. Indeed floodwaters from the wetland travel as far south as Palm Avenue during summer rains and residents find close-to-			<p>Comment noted</p> <p>The wetland unit has been excluded from the development footprint and is not infringed on.</p> <p>The Ecological Report compiled by SEF on September 2013 declare the site as of low ecological importance due to the extensive infestations by alien species, lack of indigenous</p>

Comment Raised	Interested & Affected Party	Date & Method of communication	Response
<p>surface groundwater while digging in their gardens. Thus the reassurances provided that are based on the “dry-pan” impression need careful re-analysis to prevent similar flooding problems to those presently affecting properties in Boksburg, that are close to a seasonal wetland.</p> <p>2. The intention to provide an open recreational space on the wetland is unwise. Besides the wet nature of the ground, there are wild birds present that will be disturbed.</p> <p>3. An unfenced and unpatrolled open space is likely to result in vagrants being present and children will need the constant attention of parents. Are the developers prepared to provide the necessary security? It is noted that this open recreational space is considered an option in the BAR.</p> <p>4. The trees at the northern section of the site are a feature of Plantation as its historic name suggests and add to the beauty of the suburb. However, being mainly eucalyptus species they effectively dry the land by evaporation of water through their leaves. The site plan indicates that the low cost housing will occupy much of the land where these trees are present. If they are removed it will damage the historical appearance of Plantation, but also lead to enhanced water flow from the wetland and nearer to surface groundwater precisely in the region of Residential 1 housing.</p> <p>The trees also perform the function of an effective wind-break and hence decrease the substantial amount of dust generated during windy periods from the huge mounds of bare earth used by Viewpoint Farm to produce topsoil. The Residential 1 houses will be those most affected.</p>			<p>vegetation, close proximity of major roads and dumping of building rubble, garden refuse and domestic waste.</p> <p>The alien plant species such as <i>Bidens pilosa</i>, <i>Pennisetum clandestinum</i> and <i>Eucalyptus</i> sp. with isolated specimens of only two indigenous plant species, <i>Acacia karroo</i> and <i>Hyparrhenia hirta</i> were recorded on site. Alien plants need not to be protected but may be cut and be replaced with indigenous plant species. Trees will only be removed where and when necessary and will be discussed with the ECO prior to site clearance .</p>
Certain trees in the area need to be kept as this assist with	Mrs Alison Smith	25.08.2013 by email	The wetland unit has been excluded from the development

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the drainage of rain water.	and Mr John Lindsay	and 13.08.2013 by fax	footprint.
Consider the ecological environment and wetlands.	Mr D.R. Snow	25.08.2013 by email	The status quo of the current site is prone to illegal dumping and criminal activity. The presence of clumps of Eucalyptus trees present a security risk to the area. Although it is appreciated that they provide habitat to certain bird species SEF recommends that trees should be removed during the winter season, when breeding activity is low. Only identified trees should be removed in consultation with the appointed ECO. It is proposed that alien invasive trees be substituted by indigenous species during the development proposal. Also the trees located within the 2.98 ha to the east will remain as part of the open space area, thus a large number of trees will not be removed.
The existing blue gum trees are a dust buffer to the illegal compost plant and dumpsite. Will the trees be cut down?	Mr Mark Bush	26.08.2013 by email	
<ol style="list-style-type: none"> <li>1. I am against this development based on that Plantation is known for its beautiful trees and birdlife. This development will cause a huge loss of both.</li> <li>2. If the development does go ahead, it is proposed that the existing trees be incorporated into the development, especially the area of the demolished mine housing or possibly this area used as a park for children for recreation.</li> </ol>	Mrs Pricilla Smith	26.08.2013 by email	
The grass and wetlands behind Plantation (in the proposed development area) currently houses numerous species of vegetation and wildlife. This has been a free suburb for the resident birdlife and small animals, which can be heard during the day and at night. There are owls in the area that live in the trees (which potentially may be removed). These birds limit the ingress of rodents. The lives of these creatures will have to be sacrificed to make way for this development, despite the fact that there are plenty of other open areas in the Ekurhuleni Metropolitan Municipality which may be far more suitable for the development and less invasive to the wildlife.	Mr Rossouw van Den Berg	23.08.2013 by email	
<b>8. OTHER</b>			
<ol style="list-style-type: none"> <li>1. The present Basic Assessment Report (BAR) is the latest in a series of documents prepared by Urban Dynamics, SEF and developers to obtain approval of the Proposed Residential Development (Comet 8).</li> <li>2. Many aspects are identical to those proposed earlier and concern low cost residential developments to be placed immediately adjacent to the suburb of Plantation.</li> </ol>	Prof. JD Comins	25.08.2013 by email	<p>Comments Noted.</p> <p>The Ecological Report compiled by SEF on September 2013 declare the site as of low ecological importance due to the extensive infestations by alien species, lack of indigenous vegetation, close proximity of major roads and dumping of building rubble, garden refuse and domestic waste.</p>

Comment Raised	Interested & Affected Party	Date & Method of communication	Response
<p>3. Since 2007, residents of Plantation during a series of public participation meetings and by way of written submissions have expressed strong opposition to the nature of these proposed developments of which the present submission is yet another with many of the same intentions.</p> <p>4. The present BAR largely ignores records of previous meetings, statements and submitted documents all in SEF archives. SEF needs to ensure these records are supplied to GDARD.</p> <p>5. The Draft Basic Assessment Report now received from Strategic Environmental Focus (S.E.F.) has many features that as before remain of considerable concern for the future of Plantation and the well-being of its residents.</p> <p>6. Events related to earlier public participation meetings:</p> <ul style="list-style-type: none"> <li>In spite of continuous and strong opposition from residents over a period of years to the building of low cost housing of an unacceptable nature in extremely close proximity to the existing houses in Plantation, there continues to be absolute determination by the developers aided by S.E.F. to force the procedures forward. Public participation meetings and written submissions by residents are ignored in the present submission. Indeed this is a yet further submission with the same intentions in which residents are requested to make their submissions yet again regarding the same unacceptable planning and thus perpetuate the mockery of public participation. The minutes of the Public Meeting held on Tuesday 2 June 2009 at Laerskool Goudrand, Boksburg (2009 Public Meeting) under the auspices of S.E.F provide clear evidence of previous concerns being expressed;</li> </ul>			<p>Please refer to the architectural drawings (Appendix C)</p> <p>The concept of the proposed development considered the findings and recommendations of the Heritage Impact Assessment undertaken by PGS. The Heritage Impact Assessment Report for a study undertaken by PGS recommended the following:</p> <ul style="list-style-type: none"> <li>None of the Baker buildings that were demolished need to be reconstructed within the study area.</li> <li>New buildings of similar use and function should be designed in scale (not higher than a single storey along the street edges – single buildings deep) and 3 stories from about 50m set-back from the existing boundary of the site (southern boundary) and be aesthetically sympathetic to the existing architectural fabric of the direct neighbourhood.</li> <li>Use the existing (and historic) street pattern as guideline to design the new residential area.</li> <li>Blend the new street pattern with the existing street patterns of the surrounding neighbourhood.</li> <li>Make provision of a small area (30sqm) where appropriate memorialisation of the site and its history can be designed in such a way that it is integrated into the total site development plan and forms part of the landscaping and public movement layout. Appropriate memorialisation could imply the construction of a pedestal (height: 800mm – by 1m by 1,5m) with a flat top on which a stone slab with some history and drawings are engraved or etched containing a short history of the mine and the fact that Herbert Baker designed some of the buildings. The latter must be done in granite and not in metal. The site must be located in an area where pedestrians and the public will be able to visit the spot and include it in their daily movement. If the entire development is fenced-in, the site</li> </ul>

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<ul style="list-style-type: none"> <li>It was pointed out that Plantation has historical value, being the oldest suburb of Boksburg and with the vast majority of its houses being over 60 years in age and thus falling into the category defined by SAHRA, "No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources." The houses with very few exceptions are in good condition and there are several with outstanding architectural merit. Thus new buildings of inappropriate architecture, size and appearance will damage the overall nature and beauty of the suburb; and</li> <li>An example of the failure to implement these SAHARA regulations was the demolition of Herbert Baker designed residential accommodation built earlier than 1918 on the land now being considered for development as shown in the BAR. It is an example of the failure of a number of organizations to ensure that the regulations set out by the democratic South African Government in good faith are ignored with impunity. Indeed it is tragic that remnants of these historical buildings now form ugly piles of rubble. These are now highlighted as examples of land degradation needing re-habilitation in the BAR by the very environmental organization which was begged for their urgent assistance at the time of the demolition. Similar pictures are provided in the BAR showing the results of the intentional destructive procedures of the developers who dumped further rubble on the site and sent in a bulldozer to create mounds of soil. These actions however are not associated with the developers in the BAR, but rather inserted to create the worst</li> </ul>			<p>for memorialisation should be part of such an area where the site is protected and forms part of the general site management plan of the development.</p> <p>Please note that the wetland unit does not form part of site.</p>



Comment Raised	Interested & Affected Party	Date & Method of communication	Response
<p>possible impression of the state of the site.</p> <p>7. The site characteristics are given by Worley Parsons in terms of previous occupation by a mine dump.</p> <ul style="list-style-type: none"> <li>• This is incorrect and misleading as the BAR deals with land originally occupied by the Herbert Baker designed residential buildings belonging to ERPM and now extended to include the Residential 1 housing on the northern side;</li> <li>• The slimes dam to the north was removed years ago by ERGO and its site was rehabilitated thus restoring an ancient seasonal wetland;</li> <li>• This has been confirmed with a site examination by wetland experts Fluvius Environmental Consultants on 31 March 2008 and subsequently with a desktop survey by Intraconsult Associates associated with S.E.F; and</li> <li>• Fluvius discusses wetland plant species and extensive areas of waterlogged soils being present. The report provides a corroborating photograph. Crucially both reports agree that wetland conditions are present on the study site. Furthermore Fluvius in a separate e-mail message to Antoinette Bootsma of SEF states the presence of a small stream associated with the wetland, this being evident even in old aerial photographs. A culvert underneath the Rondebult Road has been built to accommodate this.</li> </ul>			
<p>I will object to any development until the following information is provided:</p> <ul style="list-style-type: none"> <li>• Information of the market you are targeting;</li> <li>• The sizes of the units and stands;</li> <li>• The quality of the buildings i.e. plaster or face brick; and</li> <li>• Ownership of the units.</li> </ul>	Mr Alf Bush	23.08.2013 by email	The target market is the middle and high income groups. The types of houses will be free standing and apartments.



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<ol style="list-style-type: none"> <li>1. What guarantee do the residences of plantation have if the development does not comply with the scope indicated in the Draft Basic Assessment Report by SEF?</li> <li>2. What control do the council have and how will they impose control of these activities?</li> <li>3. What is shown by the general site photos in the photograph plate is not the true reflection of what occurred on site as the majority of the illegal demolitions were done by the developer.</li> </ol>	Mrs Alison Smith and Mr John Lindsay	25.08.2013 by email and 13.08.2013 by fax	<p>As part of the final Basic Assessment Report submitted to the GDARD is the Draft Environmental Management Programme (EMPr). Once the EMPr has been approved by the GDARD, it will be a final and a legally binding document. As recommended by the EMPr, an ECO must be appointed to ensure compliance to the EMPr. The ECO would ensure that the contractor does not include activities that were not approved or authorised by the issued environmental authorisation.</p> <p>The EMPr is a living document that can always be updated to ensure that it successfully address all the environmental issues and changing conditions on site.</p> <p>Non-compliance to the EMPr and the conditions in the environmental authorisation will be addressed by the ECO and the competent authority. As it is stated in the Draft EMPr, collective effort is necessary to ensure compliance to the EMPr. Therefore the ECO will ensure that complaints from the surrounding community and adjacent land owners are addressed accordingly.</p>
The Ekurhuleni Metropolitan Municipality would like to be registered as an I&AP.	Sonia Mothondini	06.08.2013 by email	Thank you. You have been registered.
<ol style="list-style-type: none"> <li>1. What is a Scoping Phase?</li> <li>2. What is the EIA technical process?</li> </ol>	Mr. Jackie Dover	24.08.2013 by email	A Scoping Phase is the initial phase of the environmental assessment process during which environmental impacts of the proposed activity or development are identified. The EIA technical process is the process during which the impacts are assessed in detail and mitigation measures are identified. It should however be noted that the environmental process followed for this project is the Basic Assessment process.
Has due thought been given to the toxic water run-off from the old mine dump property?	Mr Mark Bush	26.08.2013 by email	The Storm Water Management Plan will take into account the possible occurrence of the twater run-off to ensure that it does not impact the health of the residents in the proposed

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			development. Please also refer to letter received from the Department of Minerals and Energy (DME) in Appendix D.
Illegal waste site and compost site not 500m from development	Mr. Nils R. Bjornstad – Viking Projects	24.08.2013 by email	Comment Noted
Working on old statistics and information.	Mr. Rob O'connor	24.08.2013 by email	The studies were undertaken recently as indicated in respective reports
Rehash of 2009 notes.	Mrs. Jean Mary	23.08.2013 by email	
<p>1. I am against this development based on that viewpoint fertiliser is a problem. The rotten stench that emanates from it is at times unbearable. It would be unfair and unethical to expose unsuspecting buyers in the new development to this as it is a serious health risk.</p> <p>2. If the development does go ahead, the following changes are proposed:</p> <ul style="list-style-type: none"> <li>• The development is limited to two (2) storey dwellings; and</li> <li>• The issue of the fertiliser site is brought to the attention of potential buyers at the onset. It is grossly negligent and unfair on the part of the developers to not take into account the health risk and convenience that these unfortunate residents in the new development will be exposed to.</li> </ul>	Mrs Pricilla Smith	26.08.2013 by email	<p>It should however be noted that the fertiliser plant is a different project. Please contact the department with regards to your complaint.</p> <p>The tallest dwellings for the proposed development will be 3 floors/ storey. This is informed and supported by the specialist's studies that were undertaken.</p>
<p>1. How long will it take to complete the buildings?</p> <p>2. There will be noise during construction hours.</p>	Mr Harold Wienand	23.08.2013 by email	The completion of the construction phase will be confirmed upon receipt of all the necessary approvals. Mitigation measures will be implemented as per the approved EMPr to mitigate the noise impacts.
<p>Points to consider for the proposed development:</p> <ul style="list-style-type: none"> <li>• As freehold stands will exist in the new development, who will maintain the park, P.O.S. area of 2.98ha?</li> <li>• The Basic Assessment Report on page 9 makes no mention of the underground mine, point 32, to the north east which is possibly within the 500m</li> </ul>	Kenneth and Joan Mclachlan	23.08.2013 by email	<p>As the open space will be zoned "Public Open Space" it will be maintained by the local authority.</p> <p>The shallow undermined area is situated outside the study area. It doesn't negatively affect the site. The standard clause required by DMR will be included in title deeds.</p>

<b>Comment Raised</b>	<b>Interested &amp; Affected Party</b>	<b>Date &amp; Method of communication</b>	<b>Response</b>
radius.			