

Annex E7

Comments and Responses Report

COMMENTS AND RESPONSES REPORT: AIR PRODUCTS PROPOSED ACETYLENE GAS PRODUCTION FACILITY, DALESIDE

| Name | Organisation | Correspondence Type | Date Received | Comment | Response |
|--|--|----------------------------|----------------------|---|---|
| COMMENTS RECEIVED DURING THE INITIAL PROJECT NOTIFICATION (November 2013) | | | | | |
| David Malindi | Multiple Pro-Technology Employee | Verbal correspondence | 28/11/2013 | How many jobs will be created by the project? | The establishment of the proposed acetylene gas production facility is expected to result in approximately 10 temporary jobs during construction and 20 permanent jobs during operation. During operation, jobs will be available in the form of plant operators, security and cleaners. No employees will be housed on the proposed site during construction or operation. |
| Mamotseki Tiu | Multiple Pro-Technology Employee | Verbal correspondence | 28/11/2013 | What types of jobs will be created and will these be permanent? | The establishment of the proposed acetylene gas production facility is expected to result in approximately 10 temporary jobs during construction and 20 permanent jobs during operation. During operation, jobs will be available in the form of plant operators, security and cleaners. No employees will be housed on the proposed site during construction or operation. |
| Piet Coetzee | Cue's Pool Club | Verbal correspondence | 28/11/2013 | Concerned about the presence of a gas plant in the area especially if and when an explosion occurs. | As part of the Environmental Impact Assessment (EIA) process, ERM will be undertaking a Major Hazardous Installation assessment to identify the associated hazards of the proposed facility and to assess the potential risks. The objective of this proposed development is to reduce the potential off-site risks to surrounding land-users. |
| Neville Holman | Petrochem Instrumentation Electrical and Engineering c.c | Verbal correspondence | 28/11/2013 | Have no objections to the project as its likely to attract other businesses to the area. | Comment Noted. |
| Coen van der Merwe | Earthman | e-mail | 29/11/2013 | The stakeholder requested more information regarding the project. | Further information regarding the project will be available during the release of the Draft Scoping Report during which there will be a public commenting period and an open house/public meeting. |

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| Coen van der Merwe | Earthman | e-mail | 29/11/2013 | When will the public meetings be held? | Public meetings are set to take place at the end of February 2014. ERM communicated the date and time of the public meeting to all registered stakeholders (including yourself). |
| Jennifer Zeiss | | e-mail | 04/12/2013 | Please send me the same notification in Afrikaans, so we can notify the residents in Daleside. | Notice in Afrikaans has been sent. |
| Sandra Hansen | Resident | e-mail | 04/12/2013 | The Hansen family at 1090 / 13 Regatta road, Henley on Klip objects to the proposed new plant. | Comment Noted. |
| JP van der Merwe | Resident | e-mail | 04/12/2013 | Request to be register as an I&AP for the project. | Stakeholder has been registered. |
| JP van der Merwe | Resident | e-mail | 04/12/2013 | What emissions will be released from the plant into the air? | Acetylene gas is likely to only be released during an emergency situation/incident. There would however be minor quantities of this gas released from the storage of calcium carbide, which is used to produce Acetylene Gas as well as from the filling of gas cylinders. Dust is also likely due to the movement of delivery vehicles to and from the site. To ensure environmental protection and safety, embedded controls (design measures) will be considered to reduce these air emissions (eg. Generator recycle system) . As part of this EIA process, an Air Quality Impact Assessment is currently underway to quantify and assess the potential emissions of gases/dust that may occur as a result of the proposed facility. The results of the Air Quality Impact Assessment will be made available during the EIA phase of the project. |

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| JP van der Merwe | Resident | e-mail | 04/12/2013 | The area is already suffering from large quantities of dust from the mine and sand works. Furthermore, the rubber pyrolysis plant is also another source of air pollution in area. What impact will an acetylene plant have on the air quality of the area? | As part of this EIA process, an Air Quality Impact Assessment is currently underway to quantify and assess the potential emissions of gases/dust that may occur as a result of the proposed facility. In addition, air quality modelling will be undertaken to understand the existing and cumulative impact on the study area. The results of the Air Quality Impact Assessment will be made available during the EIA phase of the project. |
| JP van der Merwe | Resident | e-mail | 04/12/2013 | The stakeholder is concerned about fires, leaks and potential for explosions. | ERM is currently undertaking a Major Hazardous Installation (MHI) assessment to determine the risks of the proposed facility to the surrounding land-users. The proposed development site and layout has been selected to reduce the potential off-site risks to surrounding land-users. The results of the Major Hazardous Installation Assessment will be made available during the EIA phase of the project. |
| JP van der Merwe | Resident | e-mail | 04/12/2013 | This area of Daleside is part of the PWV Airshed Area. How can the local people allow more plants to be established here which will result in more air pollution? | Air Products will be applying to the Sedibeng District Municipality for an Air Emissions Licence (AEL) which will consider the Vaal Triangle Air-Shed Priority Area Air Quality Management Plan (GNR. 613 of 2009). The Air Emissions Licence Application will be made available during the EIA phase of the project. |
| JP van der Merwe | Resident | e-mail | 04/12/2013 | The stakeholder raised concerns regarding cumulative impacts. How much air pollution will be added by the project to an area already impacted? | Cumulative impacts will be addressed during the EIA phase of the project. The cumulative impact on air quality is considered to be of importance, and will be addressed as part of an Air Quality Impact Assessment which will include air quality modelling. |

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| Elizabeth Williams | QA Officer, Frankwen Forge | e-mail | 04/12/2013 | <p>The stakeholder raised an objection to the proposed project. Objection is based on concerns for the environment, the health of the local people and property values.</p> <p>This will be especially so, due to cumulative impacts of multiple industries being proposed in the area, for instance, the Glen Douglas Mine is already planning to build a coal burning furnace to extrude iron from shale on the cnr of Bokamakerie and Adelaar Drive in Daleside.</p> | As part of the EIA, an Air Quality Impact Assessment is being undertaken to quantify the emissions of gas and to assess the associated impacts. Air quality modelling will be undertaken to assess the air emissions impact on the local area. |
| Cllr. Rob P Jones | Midvaal Municipality Ward Councillor | e-mail | 04/12/2013 | Ensure that the Cllr for the area is notified of when the public meeting will take place. | All registered stakeholders (including yourself) will be notified of the public meeting. |
| Itumeleng Masiteng | SAHRA | e-mail | 05/12/2013 | A heritage impact assessment needs to be undertaken and form part of the EIA. | A heritage statement has been provided to SAHRA subsequent to receiving SAHRAs comments. ERM will await SAHRAs comments on the Heritage Statement, prior to proceeding with any assessments. |
| Itumeleng Masiteng | SAHRA | e-mail | 05/12/2013 | If graves of 60 years or older are found in the project area, they will need to be protected as per instructions laid out in the NHR Act of 1999. | Comment Noted. There have been no graves identified on site during the field surveys undertaken. |
| Trevor Kirsten | Unknown | e-mail | 05/12/2013 | The stakeholder asked to be registered as an I&AP and to be provided with further information as well as notifications during the EIA process. | The stakeholder has been registered. Further information regarding the project will be available during the release of the Draft Scoping Report during which there will be a public commenting period and an open house/public meeting. |

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| Lesley Scholtz | Midvaal Municipality Enviro Health | e-mail | 06/12/2013 | A site visit must be conducted with the various stakeholders, i.e., Midvaal LM, Provincial, National Departments, and other organisations involved. | A meeting and site visit was held on 12 February 2014 (Wednesday), all key authorities were invited to this meeting, including the Midvaal LM, Sedibeng DM, GDARD, DWA, SAHRA and the Ward Councillor. Minutes of this meeting has been appended to the FSR as Annex E8. |
| Lesley Scholtz | Midvaal Municipality Enviro Health | e-mail | 06/12/2013 | An EIA, Environmental Management Plan, and Environmental Policies must be undertaken or developed. | An EIA and EMP will be developed as part of this process. It should also be noted that Air Products is certified for quality, environmental and health and safety management systems (ie ISO 9000, ISO 14001 and ISO 22000) and is also rated 5 Star by the National Occupational Safety Association (NOSA). Air Products therefore have various policies in place for the construction, operation and maintenance of Acetylene Gas Manufacturing Facilities, including those related to emergency planning. |
| Lesley Scholtz | Midvaal Municipality Enviro Health | e-mail | 06/12/2013 | The following legislation must be adhered to: National Health Act 61 of 2003, and National Environmental Management Act 107 of 1998. | Air Products will adhere to all relevant national, provincial and local legislation. |
| Lesley Scholtz | Midvaal Municipality Enviro Health | e-mail | 06/12/2013 | The Proponent needs to obtain an Air Emissions Licence in terms of the NEM: Air Quality Act 39 of 2004. | Air Products is in the process of applying for an AEL to the Sedibeng District Municipality. |
| Lesley Scholtz | Midvaal Municipality Enviro Health | e-mail | 06/12/2013 | Occupational Health and Safety Acts 85 of 1993 will provide guidance in issues related to the provision of health and safe working environment. | Air Products will adhere to all relevant national, provincial and local legislation. |
| Albert Spencer | Unknown | e-mail | 06/12/2013 | Request to be registered as an I&AP for the project. | Stakeholder has been registered. |
| Lisa McGuigan | Unknown | e-mail | 06/12/2013 | The stakeholder objects to the construction and operation of a gas plant in the area. | Comment Noted. |

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| Seamus McGuigan | Unknown | e-mail | 06/12/2013 | Objection to gas production facility. | Comment Noted. |
| COMMENTS RECEIVED DURING THE DRAFT SCOPING REVIEW PERIOD (January - February 2013) | | | | | |
| Jennifer Zeiss | Registered I&AP | e-mail | 17/01/2014 | The local newspaper The Ster very seldom gets delivered to households in Daleside. Have you put up notices at the shops ad library in English, Afrikaans, South Sotho , Zulu and any other relevant language. You cannot depend on the Ster to inform the people here. Please advise me, which route you have taken to notify the people here. I would be grateful to you. | Notices regarding the public meeting and availability of the Draft Scoping Report were placed at the Randvaal Public Library as well as at Cues Pool Pub. Furthermore, notices were provided via the Local Ward Councillor. Notices were placed in Afrikaans and English. |
| Sean Freeman | Unknown | e-mail | 20/01/2014 | Tuesday, 19th February as proposed date for open house and public meeting is incorrect. It is infact a Wednesday. | A second email was sent to all the registered I&APs to inform them of the change of date for the public meeting to Thursday, 20 February. |
| Andrew Salomon | SAHRA Heritage Officer: Archaeology | e-mail | 19/02/2014 | As there is apparently no evidence of any significant archeological material in this area, and considering that it is unlikely that construction activities will impact on fossils that may exist on the surface, the SAHRA Archaeology, Palaeontology and Meteorites Unit has no objection to the development and grants exemption from further heritage assessments, on condition that, if bedrock is to be affected by the proposed development, a palaeontological field assessment and protocol for finds must be conducted and submitted to SAHRA for comments prior to any | Condition as prescribed will be included in the Environmental Management Plan. |

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| | | | | development. | |
| Jennifer Zeiss | Registered I&AP | e-mail | 26/02/2014 | Attached a letter regarding the new proposed kiln at the Glen Douglas Mine. The application for environmental authorisation was submitted last year and withdrawn, however the application will be re-submitted. Misunderstanding that the proposed Air Products facility is related to the Glen Douglas Mine proposed developments. Refer to Annex E5 for the letter. | Air Products application for Environmental Authorisation is not related to the proposed developments at the Glen Douglas Mine. We will however be taking this proposed project into consideration with regards to cumulative impacts. |
| COMMENTS RECEIVED DURING THE KEY AUTHORITIES MEETING (12 February 2013) | | | | | |
| Councillor Rob Jones | Ward 5 Councillor | Verbal correspondence | 12/02/2014 | What happens to the ammonia from the process? | The ammonia and any other impurities from the gas will be dissolved into water, which will be recycled and re-used in the plant process. |
| | | | | Will there be sirens for emergency situations and how loud will these be? | The plant will have sirens and alarm systems in place, these alarms will alert only on-site staff of potential emergencies. |

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| | | | | Will the employees at the existing Air Products facilities (which are planned to be closed down) be retrenched or is it planned for those employees to be re-located once this proposed facility is operational? | Approximately 90% of the workforce will be sourced locally. However, experienced individuals currently employed with Air Products will also be required to manage the operations as well as the construction of the proposed facility. |
| | | | | What are the routes to be used for the delivery of calcium carbide to the proposed site? The Daleside road should be avoided due to the slope of the road. The Henley road should rather be used. | Air Products agree that the Henly route will be used, however a Traffic Study is being undertaken to assess the transport routes. |
| | | | | Are the acetylene cylinders pressure tested? What other tests/inspections are undertaken on the cylinders? | Air Products cylinder management system is in line with the SANS 10019: Transportable pressure receptacles for compressed, dissolved and liquefied gases — Basic design, manufacture, use and maintenance. All relevant criteria of the South African Bureau Standards (SABS) are considered and applied in existing processes and procedures. |
| | | | | Please confirm that there will be no dust resulting from the transportation of lime off site, as the existing mining operations in the area do result in significant dust emissions. | Lime will be transported in the form of a putty (slightly moist). This will therefore not result in any dust emissions. |
| | | | | How will the proposed facility utilise chemical/septic tank facilities for sewage? | Yes, these facilities will be utilised on site during the construction and operations phase. |

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| | | | | Would Air Products also consider capturing stormwater runoff from surrounding properties? | Yes, as it is planned for the facility to act as a major water catchment for this water to be used in the plant process so as to reduce the water requirement from municipal sources. Furthermore up to 90% of the water used in the process will be recycled and reUsed in the plant process with minimal amounts being lost through the lime (concentrations required by contractor). |
| | | | | Will there be fail safe features? | Yes, fail safe devices will be installed at all critical process points. |
| Eugene van der Merwe | Midvaal Local Municipality | Verbal correspondence | 12/02/2014 | How many people will be employed during the operational phase of the project? | It is estimated that approximately 20 people will be required to operate the proposed facility. However this is an estimate which will be confirmed during the detailed planning stage of the project. |
| | | | | It should be noted that there is an existing issue with water supply and water pressure in the area in which the facility is proposed. | Air Products are aware of this issue and are therefore planning the collection and use of stormwater run-off for plant use. Water will be stored in two catchment pits and pumped from here at the required rate for use in the plant. |
| | | | | What is the power requirement of the proposed facility? | It is anticipated that approximately less than 1MW will be required for Phase 1 and 2 of the project. Air Products will be undertaking an application to Eskom for this power requirement. |
| | | | | What are the energy efficient mechanisms/considerations of the project? | There will be energy efficient electric motors used for the pump houses and the compressors. Air Products are also currently investigating the use of solar panels for the offices. |
| | | | | Comment from GAUTRANS must be obtained. | The Draft Scoping Report was made available to this Department. |
| Michelle Coetzee | Midvaal Local Municipality | Verbal correspondence | 12/02/2014 | The proposed facility should be checked against the current land-use zoning (ie Industrial 3). The property may need to be-zoned based on the gas being produced. | This will be considered during this planning stage. |

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| | | | | The two proposed properties must be consolidated into one property, as the development will span across both properties. | This will be considered during this planning stage. |
| COMMENTS RECEIVED DURING THE OPEN HOUSE EVENT (20 FEBRUARY 2014) | | | | | |
| Gerhard (Surname Not provided) | Resident | Verbal correspondence | 20/02/2014 | Concerned about the risk of potential fires/explosion. The facility should have the necessary measures on site to manage fires as the local fire department are not reliable. | Comment noted. |
| Willie de Kock | Pastor, FJC Ministries | Verbal correspondence | 20/02/2014 | Recognises the positive economic benefits of an international company in the area, particularly with regards to job creation. | Comment noted. |
| | | | | The facility is a step towards the planned R59 corridor development. | Comment noted. |
| | | | | Believes that Air Products understands the risks associated with the Site otherwise they would not be investing. | Comment noted. |
| | | | | The stakeholder is the pastor of the local Daleside church and runs a feeding scheme that feeds the local community 5 days a week from produce donated by local farmers. | Comment noted. |
| Jennifer Zeiss | Resident | Verbal correspondence | 20/02/2014 | Misunderstanding relating to the proposed development of a kiln at the Glen Douglas dolomite mine and the proposed Air Products facility. | It should be noted that the proposed Air Products facility is not related to the proposed developments at the Glen Douglas Mine. |

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| COMMENTS RECEIVED DURING THE PUBLIC MEETING (20 FEBRUARY 2014) | | | | | |
| Name Not Provided | Resident | Verbal correspondence | 20/02/2014 | Is this the first acetylene plant in South Africa using this production process and will acetone be produced as part of the process? | Air Products operates two other acetylene gas production facilities in South Africa using a similar production process. Acetone is not manufactured in the process, acetone is used for the safe storage and transport of the acetylene gas (ie acetylene gas is dissolved in acetone during cylinder filling. |
| | | | | The smell of carbide is a nuisance to the residents who are in lee of the surrounding factories. | It should be noted that the calcium carbide will be stored in airtight containers (turnbins) to avoid contact with air and moisture. All other products used in the production process will also be stored in airtight containers including the acetone and nitrogen. The stakeholder was invited to visit the existing Air Products facility in Kempton Park. |
| | | | | What is the cost of building this plant? | The estimated cost of building the plant is in excess of R 50 million. |
| | | | | What is the waste product produced and will it create dust emissions? | Lime slurry is not a waste product, it is considered a by-product of the production process and is planned to be made available to local contractors for use in the agricultural/infrastructure sectors. This slurry will be stored in sludge separation units where water will be drawn off. The lime will be transported in a putty form, therefore there will be no dust emissions. |
| | | | | Where is the calcium carbide produced? | It is produced in Newcastle and transported in containers. |
| | | | | Are the reaction tanks open to the atmosphere? | The generator tanks and entire production process is a closed loop system, to not allow the release of acetylene gas. |

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| | | | | What are the sources of air pollution? | Based on the operations at the existing Air Products facilities, the atmospheric emissions are generally low as the produced gas is kept in the contained system. The release of gases is only likely during an emergency situation/unplanned event, ie fires or explosions. An Air Quality Impact Assessment will be undertaken to determine the potential air emissions from the construction and operation of the proposed facility as well as the cumulative impact on the air quality of the study area. |
| | | | | What about the residual smell of lime? | There is very little to no smell associated with the lime. This will remain around the area of the pit as an onsite odour. |
| | | | | What are the operational times of the plant? | The facility will operate for 24 hours for 5 days a week. |
| | | | | Received notification of the public meeting on day of therefore expects that many residents haven't attended the meeting as they haven't been informed. Suggested other public forums/places for future notifications: Post office in Henley on Klip, churches in Daleside, local radio station, Principal's forum, and municipality communications. | Notification of the meeting was sent on 17 January 2014. ERM sent out a reminder a week before the meeting and the local Ward councillor sent out a reminder a day before the meeting. Attendees were encouraged to complete the attendance register and include the details of any residents they think should be included in the stakeholder database. All attendees' details will be noted from the attendance register and used for future communications. The possible options for future notifications have been noted and will be considered. |

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| Andries Potgieter | Resident | Verbal correspondence | 20/02/2014 | What is the reason behind the site location? | The R59 development corridor is identified as an important industrial corridor within the region. The facility requires a good distribution network and the R59 provides easy access to the major highways. Various other sites were considered during the pre-feasibility stage of the project, however the land was not considered feasible based on technical, environmental and financial considerations. In Daleside, two other sites were considered that did not meet the necessary criteria. It should be noted that the proposed facility will comprise the latest design/technology and meet all required international and local standards in terms of environment, health and safety and social aspects. |
| Thabo Mahloane | Resident | Verbal correspondence | 20/02/2014 | Will the production process use large amounts of water? Where will the water be discharged? | It is planned to collect and store storm water run-off which will be channelled to two catchment pits on site (site slopes towards the East). 214 m3/hr of water will be required for Phase 1 (top-up water). Plant will use 80-90% recycled water in a closed loop system. For additional water requirements, borehole and/or municipal water will be used. |
| | | | | What is the life span of the facility? Has the community been taken into account when the plant is decommissioned? | The lifespan of the facility will be approximately 50 years. A project specific fund will be set aside for the community as part of the Air Products Corporate Social Responsibility Programme. Air Products will consult with the community around possible initiatives for the CSR. The community is encouraged to share and identify initiatives to benefit from the fund. |
| Jennifer Zeiss | Resident | Verbal correspondence | 20/02/2014 | How many empty vs full cylinders will be on site? | At any one time, approximately 1 800 gas cylinders will be on site, 900 full and 900 empty (For Phase 1 and 2 of the Project). |

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| | | | | Will there be any pollution of the Klip River, particularly in flood situations? | The catchment pits are 4 500 m3 each and are open to provide adequate storage of storm runoff water. The surface area around the plant will be concreted so that runoff is directed to the pits and not off site. Surface water from the dirty areas will be recycled and re-used on site. The Klip River is more than 2 km away from the site, furthermore there are no drainage channels located on or around the site, thus pollution of the Klip River is unlikely. |
| | | | | When is construction expected? | Should the EIA be approved, construction is planned for December 2014. All project stakeholders will be provided the opportunity to appeal the decision, prior to construction. |
| | | | | Will the proposed development lower the property values in Daleside? | The R59 has been identified as a strategic industrial and commercial corridor for development. The proposed facility itself is not likely to result in reduced property values as there are several industries operating in the area. However, this will be considered in EIA process. |