



Mrs Sonja van der Merwe
JG Afrika
Email: vandermerwes@jgafrika.com

Subject: Objection to Proposed Powerline Corridors Affecting RW34 and RW30 Approaches – Grahamstown Aerodrome (28 October 2025)

Dear Mrs van der Merwe,

Thank you for your email dated 27 September 2025 and for sharing the Draft Screening Report and associated annexures for the Grahamstown 400/132kV Substation Integration Project.

The Grahamstown Flying Club (GFC) wish to formally record our objection to the proposed powerline corridors, specifically Corridors A2 and B1, which intersect the approach paths to Runways 34 and 30 at the Grahamstown Aerodrome. These corridors pose a significant and unacceptable risk to aviation safety and directly compromise both current operations and future expansion plans for the airfield.

The Grahamstown Flying Club

Established in the late 1930s, the Grahamstown Flying Club is a community flying club serving the Makana Municipality and general aviation in the Eastern Cape. Further information can be obtained here: www.fagt.info.

Aviation Safety and Strategic Importance

The Grahamstown Aerodrome is a vital strategic asset for Makhanda, supporting general aviation, student pilot training, emergency services, and tourism. It is unmanned and lacks air traffic control, making obstacle-free approaches and departures critical for safe operations, particularly under low visibility conditions or during emergency procedures.

Consider emergency medical evacuations; flight services supporting tourism, movement of, lecturers, farmers, government officials, lawyers and judges, pupils and parents; flight schools doing operations at the airstrip or cross countries, and commuters. All of these interests need to be considered.

The proposed powerlines fall within the extended centerlines of RW34 and RW30, which are essential for standard arrival and departure procedures. The presence of high-voltage infrastructure in these corridors introduces unacceptable risks, especially in scenarios involving engine failure, missed approaches, or low cloud cover.

Regulatory Oversight and Procedural Gaps

Despite the scale and proximity of the proposed infrastructure, the documentation provided including:

- **GHT_Draft-Screening-Report_260920251.pdf**
- **Annex-D_GHT_AIPIA_SSVR-and-Assessment1.pdf**
- **GHT-Annexure-A1.pdf, B_2.pdf, C2.pdf, and E2.pdf**

contains **no evidence of consultation with or approval from Air Traffic & Navigation Systems (ATNS) or South African Civil Aviation Authority**. There is no mention of aeronautical studies, obstacle assessments, or aviation safety impact evaluations. This is a critical oversight given the aerodrome's operational relevance and the regulatory requirements under:

- **Part 139.01.30**: Obstacle limitation and marking outside aerodrome or heliport
- **Minimum Heights Regulations**
- **Aerodrome Operating Minima**
- **SA CATS 91**: En-route safe altitude separations and missed approach procedures

The absence of aviation-specific assessments and stakeholder engagement with the GFC undermines the integrity of the regulatory process and raises serious concerns about procedural compliance.

Corridor Mapping and Technical Gaps

The corridor maps and schematics in **Annexures A1, B_2, C2, and E2** do not specify tower heights or clearance margins relative to RW34 and RW30. No aviation buffer zones or obstacle limitation surfaces (OLS) are mapped or discussed. The aerodrome is not identified as a sensitive receptor in the **AIPIA SSVR Assessment**, nor is it considered in the **Visual Screening Assessment**, despite its proximity and strategic role.

Sensitivity Classification Contradiction

The sensitivity matrix included in the project documentation explicitly classifies **airfields within 3 km as "High Sensitivity"**.



| | Sensitive Receptor | Very High Sensitivity (4) | High Sensitivity (3) | Moderate Sensitivity (2) | Low Sensitivity (1) |
|-----|-------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 15. | Passenger rail lines | Within 250m | Within 250 – 500m | Within 500m – 1km | >1km |
| 16. | Located with a Strategic Transmission Corridors | No | Partially | - | Yes |
| 17. | Airfields | Within 3km | - | Within 8 km | >8km |
| 18. | VAC | Low VAC | Moderate VAC | High VAC | Very High VAC |
| 19. | Visual Quality | Natural environment intact with no built infrastructure | Natural environment intact with limited built infrastructure | Natural environment somewhat intact with fair amount of built infrastructure | Built infrastructure is dominant with little to no natural environment remaining |
| 20. | Presence of existing infrastructure | Absent | Very low densities | Present in moderate quantities | High densities |
| | Total | High (60) | | | |

The Grahamstown Aerodrome falls squarely within this range. Yet, despite this classification, **none of the annexures or the draft screening report apply this sensitivity rating to the aerodrome in any meaningful way.** There is:

- **No aviation-specific mitigation plan** for high sensitivity receptors.
- **No evidence of ATNS or SACAA consultation or approval.**
- **No obstacle clearance analysis or tower height impact assessment.**
- **No recorded benefit or consideration for the aerodrome,** even though the sensitivity matrix implies it should have been prioritized.

This omission is a serious contradiction and demonstrates a failure to apply the developer's own criteria consistently.

Absence of Recorded Benefits

None of the annexures, including the **Socio-Economic and Tourism Assessment, Fauna and Flora, Avifauna, Aquatic, Soils, or Visual Screening** identify any benefit to the Grahamstown Aerodrome or the aviation community. This omission is particularly concerning given the aerodrome's contribution to regional connectivity, emergency response, and economic development, outlined above,

GFC Requests

We respectfully request:

1. **Immediate reconsideration and realignment** of Corridors A2 and B1 to avoid RW34 and RW30 approach paths.

2. **Full disclosure** of aviation-related approvals and assessments conducted by ATNS and SACAA.
3. **Inclusion of the GFC** in all future consultations and decision-making processes related to the aerodrome and its airspace.
4. **Consideration of the GFC's stakeholder letter dated 28 October 2025**, which outlines our position and concerns to stakeholders.

We remain committed to constructive engagement and welcome the opportunity to work with all stakeholders to ensure that development in the region proceeds in a manner that is safe, compliant, and sustainable.

Kind regards,

Darren Olivier

Darren Olivier

Chairman, Grahamstown Flying Club

Tel 071 606 5544

contact@fagt.info