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## **EIB LOAN - LOT B5.3**

# **Construction of the "Petlovo Brdo" Interchange and "Orlovaca" Interchange (phase II)**

## **PETLOVO BRDO INTERCHANGE PROJECT**

# **REPORT ON PUBLIC CONSULTATION**

**Belgrade, August 2015**

## Contents

EXECUTIVE SUMMARY .....	3
1. PUBLIC CONSULTATION, BELGRADE, 18 JUL 2013, PERS PREMISES, VLAJKOVICEVA ST.....	10
2. MEETING WITH PAP, BELGRADE, 6 MAR 2014, PERS PREMISES, VLAJKOVICEVA ST.....	11
3. MEETING WITH PAP, BELGRADE, 8 MAY 2014, PERS PREMISES, VLAJKOVICEVA ST.....	12
4. CONSULTATION OF PAP - ACTION PLAN, BELGRADE, 17 MAY 2014, KULTURNI CENTAR RAKOVICA, MISKA KRANJCA STR.....	13
5. CONSULTATION OF PAP – ACTION PLAN, BELGRADE, MAY 27th –6 JUN 2014, OFFICE CLOSE TO PARK-FOREST “BORICI” .....	14
6. CONCLUSION .....	15
ANNEXES .....	18
Annex 01 Outline description of the PERS final proposal	
Annex 02 Detail list of question raised and PERS answers provided, Feb 2013- Sep 2014	
Annex 03 Public Announcement – 1 <sup>st</sup> invitation to PAPs, EIA procedure for PBI Project	
Annex 04 Public Announcement – 2 <sup>nd</sup> invitation to PAPs, EIA procedure for PBI Project	
Annex 05 Park-Forest area used for different PBI Project alternatives	
Annex 06 Public Announcement – invitation to PAPs, Public Consultation, ESAP document	
Annex 07 Public Consultation on ESAP document, Rakovica, Belgrade, 17 May 2014	
Annex 08 Public Consultation office, Contractor premises near the Park-Forest “Borici”	
Annex 09 Invitation on PC - Placing of flyers within the yone of Park-Forest Borici	
Annex 10 Public Consultation with PAPs on the site, Park-Forest “Borici”, May 2014	

## ABBREVIATIONS AND ACRONYMS

EIA	Environmental Impact Assessment
EIB	European Investment Bank
EIB-CM	European Investment Bank – Complaints Mechanism
EMP	Environmental Management Plan
INP	Institute for Nature Protection of the Republic of Serbia
IPCM	Institute for Protection of Cultural Monuments of the Republic of Serbia
NGO PB	Non Government Organisation “Petlovo Brdo”
NGO GSPB	Non Government Organisation “Green Settlement Petlovo Brdo”
PAP	Project Affected Person
PBI	Petlovo Brdo Interchange
PERS	Public Enterprise “Putevi Srbije” (Roads of Serbia)

## EXECUTIVE SUMMARY

Public Enterprise “Roads of Serbia” (PERS) prepared a New Petlovo Brdo Interchange (PBI) Project for execution in accordance with Serbian law and existing planning documents. The area aimed for interchange construction has been reserved for over 20 years. Significant part of that area is covered with the Park-Forest now, and part of Park-Forest was planned to be removed in order to ensure space for the Interchange construction. The detailed design was produced in 2013 and basic design followed a predefined interchange concept with full system of traffic connections (all direct and indirect ramps), as it is shown in Picture 01.



Picture 01: Basic Detailed Design

After receiving a complaint from Project-affected persons representatives (two NGOs from Petlovo Brdo settlement), PERS established a new round of dialogue with all stakeholders, relevant institutions and PAP. All the Project details and legal framework were explained to the interested parties during the process which included numerous meetings with the NGOs and PAPs as well as one consultation meeting with the PAP (details of these meetings are presented in this Final Report).

It is important to be recorded that during almost a year of negotiations with PAP PERS offered more Project alternatives which included additional junction and construction of proper playground and resting area within the remaining part of Park-Forest “Borici”, without any additional cutting of trees.

Concerns expressed by complainants as well as their suggestions regarding Project alternatives have been duly taken into account and, to the extent were such proposals were feasible.

A complete list of the questions and suggestions made by the stakeholders can be found in Annex 02 together with the replies from PERS.

After receipt of the complaints and the start of the review by the Complaints Mechanism as well as EIB’s advised on suspension of planned works on PBI Project, PERS reviewed the detailed design once again and proposed different Project alternatives aiming to address, to the extent possible, the concerns raised by the PAP, namely sparing a maximum of the Park-Forest “Borici” and to ensure safe approach to the Ibarska road to all resident and commercial buildings owners.

The alternative Project solution comprises a reduced number of direct and indirect ramps, which indeed spares a significant part of Park-Forest “Borici”, improved and safer accesses for the side streets into Ibarska road and enhanced environmental mitigation and compensation measures. The outline of the revised project is shown in picture 02 and the main characteristics described below.



Picture 02: the revised solution

A detailed plan for compensation of greenery was also prepared, including design of reforestation. After a one-year-long process of dialogue with different interested groups, the Project alternative outlined in Picture 02 is **PERS final proposal**.

Under the current permitting, this solution can only be treated as Project Phase I, until the traffic levels will reach the capacity of the infrastructure. However, according to current estimated, this will not happen before year of 2031. Traffic load analysis and forecast given within the Detailed design for year of 2031 is shown in following Table:

Year 2031		toward	toward	toward	toward
		<b>Belgrade</b>	<b>Zeleznik</b>	<b>“Orlovaca”</b>	<b>Rakovica</b>
from	<b>Belgrade</b>		6.000	18.100	2.857
from	<b>Zeleznik</b>	3.109		1.839	4.478
from	<b>“Orlovaca”</b>	13.690	2.857		1.938
from	<b>Rakovica</b>	4.115	4.620	1.576	

Expected traffic load on missing direct and indirect ramps in year 2031 will be between 1938 veh/day (connection “Orlovaca” – Rakovica) and 4115 veh/day (connection Rakovica – Belgrade). This confirms relatively low traffic load on direct and indirect ramps.

Missing ramps and their traffic connections have alternative, whether road users use “Orlovaca Interchange” or another connection to Ibarska road (existing delevated interchange “Labudovo Brdo” distanced 300 m from the “Metro” junction, as it is shown on picture 03.



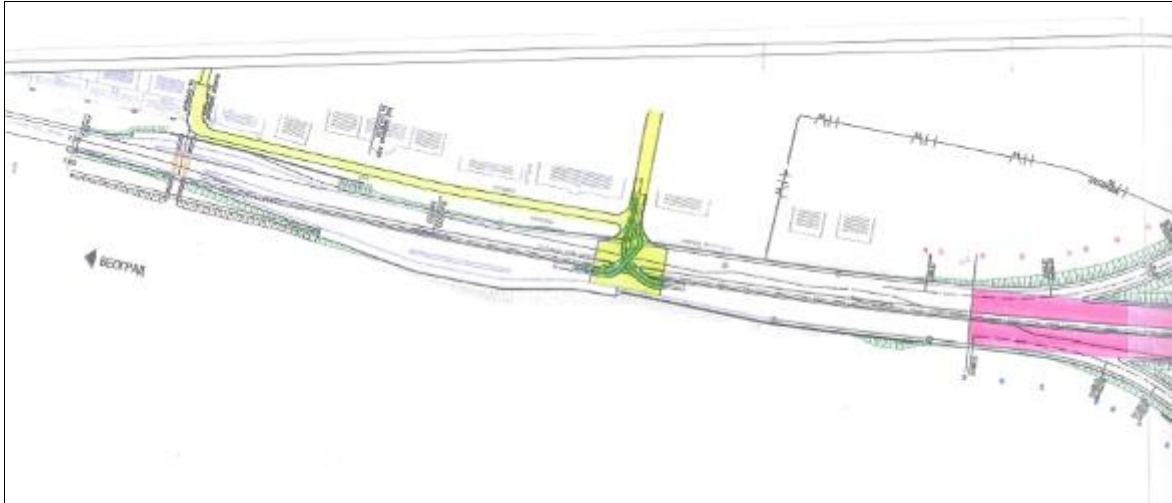
Picture 03: location of interchange “Labudovo Brdo” and connections with a Ring Road

If and when that need arises, the situation will be re-assessed and an agreement with all PAP will be sought regarding possible construction of the remaining part of the Project (one direct and one indirect ramp in the zone of Park-Forest “Borici”) or another arrangement that may be feasible at the time. In case of no agreement with PAP regarding Project Phase II, **Project will end as Phase I.**

A safe surface junction in zone of Djuje & Dragoljuba Street is integral part of this proposal now. Preparation of Project changes and improvement commenced during July 2015, after a several rounds of meetings with relevant Belgrade City authorities. Direct contact with City of Belgrade authorities is established and on May 21, 2015, a meeting with City of Belgrade Traffic Directorate representatives is held. It was concluded that proposed project changes should be developed into a proper Detailed design.

During June and July 2015 several design improvements were considered, some are rejected, but **a conceptual design of a “Djuje and Dragoljuba” junction is done.** Junction is designed as safe surface junction, equipped with traffic lights, pedestrian crossings and additional lightening. Traffic connections with private and commercial buildings close to Ibarska road are enabled by using a service road which is connected with Djuje and Dragoljuba Str, ensuring requested connection with Ibarska road through safe surface junction. Also, during conceptual design phase, it is agreed with City Design Unit that all necessary consents of relevant City authorities and a new detailed design will be obtained by Designer during Detailed design phase.

Project changes (shown on Picture 04 and 05), namely ensuring safe service roads for private and commercial buildings and including safe approach to Ibarska Road through surface junction at Djuje and Dragoljuba Str. will be additionally designed as improvement of current Detailed design. It is estimated that whole designing and permitting procedure will not take more than 3 months. Redesigning will start immediately after a positive final EIB decision regarding this Project is received.



Picture 04: Extract from Conceptual design 2015 – Safe junction and service roads



Picture 05: Working paper used for Public Consultations, 2014

In order to avoid misunderstandings on the boundaries of the Project, PERS used the process of consultations to present all the Project details to PAP and ensure them that the Project will have no significant negative impacts on the existing service roads. Ibarska road widening is planned on the opposite side, where empty area is reserved for Project execution (blue lines on above drawing). The existing service road (yellow line) remains where it is now, and a safe approach to Ibarska road will be ensured through surface junction at Djuje & Dragoljuba Str. (white circle on above drawing). Traffic lights and other equipment of surface junction were considered by City authorities and other experts during junction design phase.

This revised project is considered by PERS as a fair one, as it serves the traffic needs, it addresses the majority of the concerns and it complies with the spatial planning and permits in force, therefore it can be easily implemented.

**A more detailed description of the proposal is presented in Annex 01 of this Final Report.**

A complete list of the questions and suggestions made by the stakeholders can be found in Annex 02 together with the replies from PERS.

**Next steps**

From PERS perspective the Process of Consultation of PAP could be considered as concluded.

**As previously recommended, PERS developed design of the road infrastructure, landscaping and replanting, reforestation, traffic management, environmental monitoring and other compensation measures on the bases of the outline proposed.**

**Additionally, in order to ensure full compensation for the affected forest area, Action Plan addressed all activities related to moving and improving the recreational area of the Park-Forest “Borici”.**

**Consents on Detailed design are obtained from all relevant State and City institutions.**

**The PAPs are invited to participate in the process of development of certain elements that relate directly with the compensation measures, such as the extent and layout of the playground, landscaping, monitoring, etc. The PAPs engagement plan in the process will be developed and made public in due time.**

**After publication of this Final Report, the PAP will have a period to give their final opinion on PERS proposal and the way forward.**

**EIB will assess the situation following the position of PAP and the work done by PERS.**

## BACKGROUND

**The existing – already constructed interchange “Petlovo Brdo”** has been used for traffic for years now and it is located within the zone of settlement “Petlovo Brdo”, on the crossing of the existing Ibarska road and the regional road which is connecting Zeleznik and Rakovica. This interchange is only a temporary solution until the new interchange “Petlovo Brdo” is constructed. The existing interchange “Petlovo Brdo” with the belonging part of the Ibarska road is defined as a “black spot” on the traffic network in the R. of Serbia because of the high rate of traffic accidents with fatalities.

**The new interchange “Petlovo Brdo”** will be constructed in replacement of the existing interchange, on a location defined and in compliance with the valid plan and design documentation, with the aim of increasing the traffic flow and traffic safety and preventing further traffic accidents. The new PBI Project is an integral part of the E-70/E-75 Belgrade By-Pass Project. It is funded by the international credit granted by the European Investment Bank (EIB) as part of the Construction of the New PBI and “Orlovaca” Interchange (phase II) – LOT B5.3. The “black spot” on the Ibarska road resulting from the current temporary solution (Existing – Constructed interchange “Petlovo Brdo”) will be eliminated with the construction of the new PBI thus significantly increasing the safety of the traffic.

The Design for the New PBI involves removal of a certain number of trees within the zone of park-forest “Borici” in the surrounding settlement “Petlovo Brdo”. Park-forest “Borici” is not a protected nature reserve, thus the conditions issued by the relevant institutions do not forbid cutting of trees for the needs of this Project, however they request compensation for the green areas destroyed as a result of the construction.

During 2012 PERS initiated and completed a separate Environmental Impact Assessment (EIA) procedure regarding EIA Study for the New PBI. This procedure has been concluded with the Ministerial decision regarding the NO REQUIREMENT of an EIA Study for the New PBI. The same Decision defines the obligation of PERS to respect all protection conditions obtained from relevant institutions.

During 2012, and in compliance with the national EIA procedure, interested parties were invited twice, by publication in the daily newspaper Politika, to raise their concerns on the Project and the fact that no EIA would be needed, but no comments were received.

During 2013 citizens of the Petlovo Brdo settlement received information by the media that commencement of the construction works on PBI Interchange Project was scheduled for that calendar year. Activities of the NGO GSPB started in April 2013, in order to stop the construction of the interchange due to the expected negative environmental impact of the Project - the upcoming removing of a certain number of trees within the Park-Forest “Borici”, close to the residential area of Petlovo Brdo settlement. The major problem highlighted by the NGO was the fact that significant part of existing park-forest “Borici” currently used as recreational area, is to be used, according to the plans adopted many years ago, for the PBI construction. That particular area was reserved by the Government of Serbia especially for the PBI Project for over 20 years.

During the summer 2013, NGO GSPB lodged a complaint with EIB-CM concerning this Project. That caused temporary suspension of funding of the Project, which is still in force at the time of preparation of this Final Report. The key objection of NGO GSPB referred to the considerable potential devastation of the Park-Forest "Borici" (about 5 ha of forest) in the space provided for the construction of the Project, which would in the opinion of the citizens significantly worsen the conditions and quality of life for residents in the area of the Project.

EIB-CM Representatives, as of September 2013 to date, repeatedly visited Belgrade, visited the site, conducted interviews with NGOs and PERS and suggested a mediation process between the two sides in order to find possible compromise solutions.

During April 2014 NGO PB lodged another complaint with EIB-CM concerning this Project. NGO PB complaint referred to the negative social impacts of the Project. NGO PB Representatives have expressed concern that the Project would deny access to the commercial and residential facilities in the Project zone. NGO PB representatives estimated that the Project would stifle economic activities, so most of the existing companies in the area would need to close and it would inevitably lead to a loss of jobs for a large number of employees in these companies.

At the request of the EIB, JPPS has prepared a detailed Action Plan to protect the natural environment and social wellbeing of the residents. The plan offered two design alternatives that can be implemented on Project aimed surface, with the full program of compensation measures and including complete elimination of the negative social impacts of the Project. The solution entails minimal impact on the Park-Forest "Borici" while maintaining all service roads for local residents and safe connection to the Ibarska road by introducing surface intersections supplied with traffic lights. The Action Plan was placed on a PERS website and the interested public was invited to participate in consultation meetings in relation to this Project. In order to allow for comprehensive stakeholder engagement and to manage legitimate expectations deadlines were extended in consultation with the PERS representatives and complainants, and the Action Plan is still available on PERS web site.

The results of this consultation, notably full list of questions and suggestions made by interested citizens, can be found in Annex 02 of this Final Report.

**1. PUBLIC CONSULTATION, BELGRADE, 18 JUL 2013, PERS PREMISES,  
VLAJKOVICEVA ST.**

During 2012, and in compliance with the national EIA procedure, interested parties were invited twice, through publication in daily newspaper Politika, to raise their concerns on the Project and the fact that no EIA would be needed, but no comments were received.

Additional round of public consultations was organized by the PERS on 18 July 2013.

Representatives of NGO PB, NGO GSPB, JKP “Greenery Belgrade”, Serbian Institute for Nature Protection (INP) and Highway Institute Belgrade (Designer and Environmental Specialist) participated on this Public Consultations. All Project details were presented to the participants, especially Project impact and Project related mitigation measures, compensatory measures and monitoring activities.

As a kind of compensatory measure, PERS offered restocking and re-arranging the recreational area within the park-forest “Borici” to PAPs representatives in order to ensure existence of proper resting and gaming area, supplied with adequate number of tables, benches and children playgrounds.

NGO PB representatives proposed a completely new alignment of Ibarska road, outside the spatial area aimed for Project implementation. PERS representatives elaborated that such proposal is in direct conflict with existing Spatial Plans, and basic disadvantages of proposal are time loss, enormous rising of Project costs, potential problems related with Project funding and absolutely no guaranties that process of Spatial Plan changes will be successful.

This round of consultation lasted 1 day.

**Number of participants: 20**

**NGO GSPB representatives: 3**

**NGO PB representatives: 3**

**PERS representatives: 5**

**2. MEETING WITH PAP, BELGRADE, 6 MAR 2014, PERS PREMISES, VLAJKOVICEVA ST.**

Following acceptance by the parties, the EIB-CM organized a first mediation meeting with the parties on 4 March 2014. During the mediation meeting PERS presented a new Project design that took into account the concerns raised previously by the NGOs, notably the preservation of the major part of Park-Forest “Borici”. New concerns were raised during the mediation meeting, notably as far as access to local businesses was concerned and it was therefore agreed that the discussions on this issue would continue between the parties in order to find a solution. It was also agreed that once a new design solution was available a meeting on the improved design would be held to which the population of the settlement would be invited.

Accordingly, on 6 March 2014 PERS held a meeting with the Representatives of the NGO GSPB. During this meeting, in presence of the Designer, the interested parties were enabled to review the Detailed Design for PBI and analyze various alternatives regarding elimination of the negative environmental and social impacts of the Project.

This meeting with PAPs lasted 1 day.

**Number of participants: 9**

**NGO GSPB representatives: 4**

**NGO PB representatives: 0**

**Highway Institute Belgrade representatives: 2**

**PERS representatives: 3**

**3. MEETING WITH PAP, BELGRADE, 8 MAY 2014, PERS PREMISES, VLAJKOVICEVA ST.**

This meeting with PAP was held on 8 May 2014.

During the meeting it was noted that NGO PB representatives had issued drawings with incorrect position of Project boundary lines. All Project lines were drawn 10m closer to the private and commercial objects near Ibarska road, so PERS representatives concluded that there is a high risk that the citizens are wrongly informed about this Project.

The representative of NGO PB explained that he used existing plans for the city area without the PBI Project zone and extends the service road lines into the zone of PBI Project. That's how the mistake occurred.

Two participants in this meeting were private and commercial buildings owners and were more than surprised when PERS representatives explained that no disturbance to the existing service road will occur during Project implementation, and that there will be no widening of the Ibarska road towards their buildings.

PERS representatives concluded that new, correct drawings are necessary to be shown to the Petlovo Brdo residents.

Additionally, NGO PB representatives proposed again a completely new alignment of Ibarska road, outside the spatial area aimed for Project implementation. PERS representatives elaborated that such proposal is in direct conflict with existing Spatial Plans, and basic disadvantages of proposal are time loss, enormous rising of Project costs, potential problems related with Project funding and absolutely no guaranties that process of Spatial Plan changes will be successful.

This meeting with PAP lasted 1 day.

**Number of participants: 8**

**NGO GSPB representatives: 0**

**NGO PB representatives: 5**

**PERS representatives: 3**

**4. CONSULTATION OF PAP - ACTION PLAN, BELGRADE, 17 MAY 2014,  
KULTURNI CENTAR RAKOVICA, MISKA KRANJCA STR.**

Consultations of PAP during which the Environmental and Social Action Plan (ESAP) was presented to the interested public, were held at the Cultural Center of Rakovica, located in the municipality of Rakovica in whose territory this Project will be implemented.

The Public Announcement with reference to the consultation was published in the daily newspaper "Politika" on 3 May 2014 (App. 05) and was placed on the PERS website. NGO's representatives informed citizens about the new round of consultations (by delivering flyers – invitations and placing the invitation letter on their blog).

Consultation was attended by about 80 people, in the presence of the EIB-CM representatives, as observers. PERS presented the key reasons why it is necessary to implement the Project in shortest term, and explained in detail the main Project and its alternatives (App. 06). The public presentation was properly completed and the citizens' objections were registered.

PERS representatives also provided basic information about the compensation measures. Some citizens proposed several design alternatives but they were all in direct conflict with the existing planning documents.

After completion of the public presentation a joint meeting of representatives of the EIB, PERS and both NGOs was held in the premises of "Zomont" company, close to Project zone. At the meeting it was agreed to extend the consultation process with citizens to 6 June 2014 and NGOs have taken on the obligation to inform their neighbours about the continuation of the consultation process.

This round of consultation lasted **10** days.

**Number of participants: 88**

**NGO GSPB representatives: YES**

**NGO PB representatives: YES**

**PERS representatives: 4**

**EIB representatives: 3**

**5. CONSULTATION OF PAP – ACTION PLAN, BELGRADE, MAY 27th –6 JUN 2014, OFFICE CLOSE TO PARK-FOREST “BORICI”**

PERS representatives have provided premises in the immediate environment of the Park-Forest “Borici”, created the necessary graphics presentation and survey sheets and invited citizens to participate in consultation in relation to this Project once again (App. 07).

JPPS has prepared a leaflet (flyer) that was appended in close to 30 different places within the Park-Forest "Borici" (App. 08) and announcement with a call for consultations was placed on the PERS website. In these the interested parties and persons were invited to come to the premises for consultations that were held every working day from 11 to 13h. Two PERS representatives were always present at the consultations, providing answers on questions raised by interested public. A tour in the Park-Forest “Borici” was repeatedly done during the process of consultation, and communication with the public regarding the implementation of this Project was established there too (App. 09).

At the PERS request the Contractor clearly marked with wooden sticks the Project boundary line (border of Project intervention). It was done in order to help the interested persons to gain insights into the forest zone, which is intended for realization of the Project.



During 10 days of consultations all Project details and possible alternatives were explained to each participant. Survey sheets were delivered to PAP and most of them replied in written form. Each particular opinion and remark was deeply analysed by PERS and detailed answers with explanations were sent to each sender.

Consultations have been completed as planned, on 6 June 2014.

In order to allow for comprehensive stakeholder engagement and to manage legitimate expectations deadlines were extended in consultation with the PERS representatives and complainants, and the Action Plan is still available on PERS web site.

**Number of participants: 26**

**NGO GSPB representatives: YES**

**NGO PB representatives: YES**

**PERS representatives: 2**

## **6. CONCLUSION**

From PERS perspective the Process of Consultation of PAPs could be considered as concluded.

PERS took an active role in the mediation process aiming to find an acceptable solution. PERS offered different feasible and sustainable Project alternatives, modifying basic design into more environmental and socially acceptable Project.

The Project and its alternatives were presented to the PAP. Several additional rounds of Public consultations and meetings were organised, most of them in the near vicinity of subject Park-Forest and Project zone. All relevant Project informations are detailed into the ACTION PLAN which has been, and still is, available on PERS web site since April 2014. In order to allow for comprehensive stakeholder engagement and to manage legitimate expectations deadlines were extended in consultation with the PERS representatives and complainants.

**Final PERS proposal is shown on Annex 01 and will remain valid until EIB's final decision regarding this Project.** PAPs are welcome to provide their opinions, suggestions or remarks on PERS FINAL PROPOSAL during that period.

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Petlovo Brdo Interchange Project – Environmental and Social Impact Assessment  
20150827 FINAL Report on Public Consultations

Table 01: Evaluation of different Project alternatives

		Connection with "Orlovaca" Interchange?		Black spot elimination?		% of preservation of Park-Forest?		approach to the Ibarska road in the residential & commercial zone		Full concept of traffic connections?		Project harmonised with existing Spatial Plans?		Project financing ensured?		Verified Detailed design exists?		Demolition of part of already constructed "Orlovaca" Interchange?		
		yes		yes				yes, safe		yes, safe		yes		yes, condition ally		yes		no		
1	PERS final proposal	yes	5	yes	5	90%	4	yes, safe	2, 5	yes, safe, but 2 ramps are missing in PBI	0	yes	5	yes, condition ally	2,5	no, changes are required (surface junction at Djuje & Dragoljuba Street)	2,5	no	5	<b>31,5</b>
2	Basic detailed design	yes	5	yes	5	30%	-5	no	-5	yes, safe, 4 ramps exist in PBI	5	yes	5	yes, condition ally	2,5	yes	5	no	5	<b>22,5</b>
3	Do nothing	yes, unsafe	0	no	-5	100%	5	yes, unsafe	2, 5	yes, unsafe	-3	ne	-5	not needed	5	not needed	5	no	5	<b>9,5</b>
4	Proposals of NGO GSPB	yes	5	yes (t)	0	100%	5	yes, unsafe	2, 5	yes, unsafe	-6	A new Spatial Plan is required	-5	not ensured	-3	new design, preconditions of relevant institutions, consents	-5	yes	-5	<b>-11,5</b>
5	Proposal of NGO PB	no, current Ibarska road becomes a "dead end"	0	yes (t)	0	100%	5	no	-3	yes, unsafe	-3	A new Spatial Plan is required	-5	no, enormous raising of Project costs	-5	new design, preconditions of relevant institutions, consents	-5	yes	-5	<b>-21,0</b>

## LIST OF PARTICIPANTS

Upon EIB-CM suggestion, a detailed list of participants is excluded from the FINAL version of the Report due to the fact that personal data should not be presented within the public document.

Still, it is important to emphasize that representatives of both NGOs who filed a complaint with the EIB-CM were invited and present during whole consultation process. PERS maintained contact with both NGOs, held separate meetings and correspondence in order to find an acceptable solution which can meet requirements of all parties / stakeholders.

List of participants is kept by PERS.

## **ANNEXES**

### Outline description of the PERS final proposal

PERS reviewed the detailed design during 2013 and 2014 and proposed different Project alternatives aiming to address, to the extent possible, the concerns raised by the PAP, namely sparing a maximum of the Park-Forest “Borici” and to ensure safe approach to the Ibarska road to all resident and commercial buildings owners. The alternative Project solution comprises a reduced number of direct and indirect ramps, which indeed spares a significant part of Park-Forest “Borici”, improved and safer accesses for the side streets into Ibarska road and enhanced environmental mitigation and compensation measures..

The improved interchange design comprises a reduced number of direct and indirect ramps. The outline of the revised project is shown in the picture below.

Zeleznik



Rakovica

A detailed plan for compensation of greenery was also prepared, including design of reforestation. After a one-year-long process of dialogue with different interested groups, the Project alternative shown on picture above is **PERS final proposal**.

Under the current permitting, this solution can only be treated as Project Phase I, until the traffic levels will reach the capacity of the infrastructure. However, according to current estimated, this will not happen before year of 2031. Traffic load analysis and forecast are presented within the executive summary of this Final Report.

Another important Project fact which was explained and presented to PAPs during consultations is that Belgrade City Master Plan for 2020, Spatial Plans of Belgrade Highway By-Pass and Regulation plan of Ibarska road are fully harmonised and each of them confirms that current Ibarska road **will be widened on west side**, becoming capacitive dual carriageway:



Example of Dual carriageway concept of future Ibarska road within the Park-Forest zone

This is important to be clarified, respecting the facts that during consultations with PAPs PERS representatives were under impression that some of PAPs were wrongly informed about it. During consultation process it was confirmed that some of the NGOs representatives presented different “project and plans” to Petlovo Brdo residents, raising their fears and negative reaction to the Petlovo Brdo Interchange Project.

## Environmental and Social compensation measures

### a) Park forest area

Park forest “Borici” is located on southern part of “Petlovo Brdo” settlement. Forest area is almost 10 ha, and it is clearly marked on the picture bellow.



According to the Action plan, a new Petlovo Brdo Interchange will be constructed with reduced number of direct and indirect ramps. It will spare almost 1,7 ha of

Park forest. Still, Ibarska road will be constructed through small part (8%) of Park Forest as it is shown on a picture below:



Part of Park Forest Borici which will be affected by the Project (vegetation will be removed) is 0,8 ha. By original design, according to the actual spatial plans, almost 2,5 ha of the park forest “Borici” was planned to be cut down. Project improvement presented to the PAPs during Public Consultations affect 0,8 ha only. This area is clearly marked as **black triangle** on following picture:



“Black triangle zone” was clearly marked “in city”, directly in the Park Forest “Borici”, during process of public presentation of Action Plan. All interested parties people have had a chance to see the volume of affected zone and to discuss with PERS representatives all project aspects.

Additionally, it was explained to the interested parties that mitigation plan includes reforestation and planting of a different kind of trees, in higher density, close to

triangle zone, according to the Detailed design of Reforesting which is already approved by relevant City authorities (Greenery Belgrade).

The total forest area that will act as mitigation against air and noise pollution will be the same, respecting the fact that every single three will be compensated. New threes planted in much higher density, combined with existing vegetation, and very close to the source of air and noise pollution (Ibarska Road) will significantly contribute in reducing / mitigation of air and noise pollution to Petlovo Brdo Residents in this area.

Also, according to adopted Detailed design of reforestation, a new green area will be ensured on the opposite side of the Ibarska road, where the actual road is now and within the loop of the access ramp.

#### b) A new recreation area

The total surface of the park-forest “Borici”, that is usable for recreation will remain the same, or even bigger, depending on PAPs support for implementation of this part of Action Plan. A new recreation area is offered to PAPs to be arranged and equipped within the remaining part of the Park Forest (anywhere among remaining 9 ha), without cutting of additional threes. Basic concept was presented to PAPs and it is shown on following pictures:



The quality of the area will be improved through:

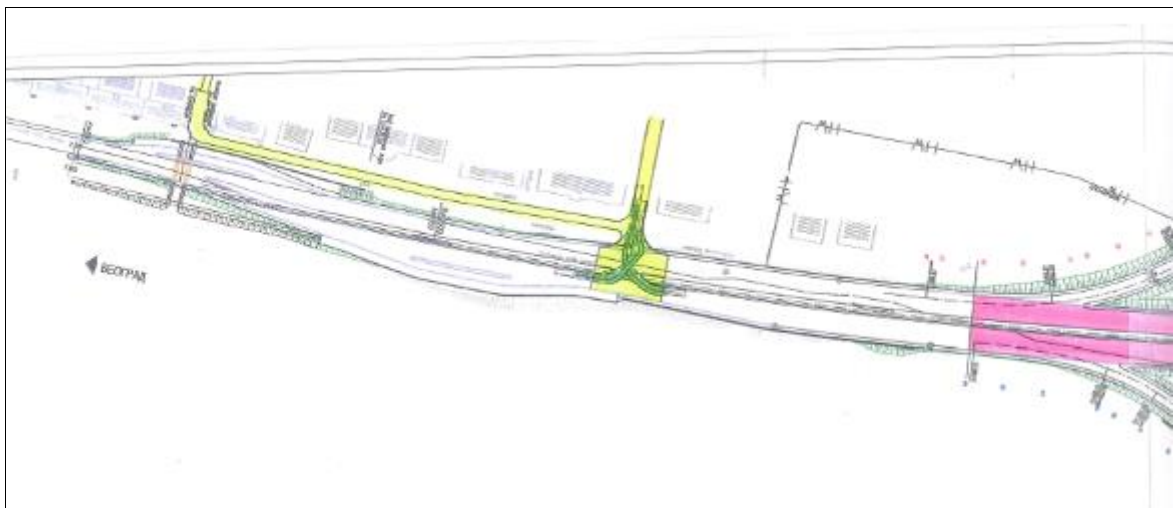
- Improved layout and equipment of the playground;

- Fencing of the park/playground;
- Lighting;
- Vegetal barrier towards the roads;
- Improved drainage of the road run-off water

c) Road safety and traffic management - Access to/from Ibarska road

Basic Project design took into account that all current illegal approaches to Ibarska road are unsafe and the designers proposed to close these illegal unsafe connections. Instead of them, the designers proposed the alternative connections by using two safe intersections in the zone of Petlovo Brdo settlement.

Respecting complaints received by PAP, PERS asked the designers to analyse and offer possible Project alternatives. As a result of that, a new, safe junction, supplied with traffic light, at Djuje & Dragoljuba Str. is integrated in the final PERS proposal. Basic project changes comprise ensuring the safe access to the settlement / Ibarska road to affected people – mostly owners of the residential and commercial buildings placed along the Ibarska road.



The Project will have no significant negative impacts on the existing service roads. Ibarska road widening is planned on the opposite side, where empty area is reserved for Project execution (blue lines on above drawing). The existing service road (yellow line) remains where it is now, and a safe approach to Ibarska road will be ensured through surface junction at Djuje & Dragoljuba Str. (white circle on above drawing). Traffic lights and other equipment of surface junction are considered by City authorities and other experts during conceptual design phase (May-July 2015).

A safe surface junction in zone of Djuje & Dragoljuba Street is integral part of this proposal now. Preparation of Project changes and improvement commenced during July 2015, after a several rounds of meetings with relevant Belgrade City authorities. Direct contact with City of Belgrade authorities is established and on May 21, 2015, a meeting with City of Belgrade Traffic Directorate representatives is held. It was concluded that proposed project changes should be developed into a proper Detailed design.

During June and July 2015 several design improvements were considered, some are rejected, but **a conceptual design of a “Djuje and Dragoljuba” junction is done**. Junction is designed as safe surface junction, equipped with traffic lights, pedestrian crossings and additional lightening. Traffic connections with private and commercial buildings close to Ibarska road are enabled by using a service road which is connected with Djuje and Dragoljuba Str, ensuring requested connection with Ibarska road through safe surface junction. Also, during conceptual design phase, it is agreed with City Design Unit that all necessary consents of relevant City authorities a new detailed design will be obtained by Designer during Detailed design phase.

**List of questions and suggestions made by interested citizens  
and answers provided**

**A. ALTERNATIVES PRESENTED BY STAKEHOLDERS AND THEIR  
FEASIBILITY**

The alternatives presented by the complainants and other stakeholders were duly taken into account and examined by PERS. Hereafter is the detailed explanation as to why they are not feasible :

1. Moving interchange area outside the area of the existing Spatial Plans is against the Law. The area which was identified by the PAP as appropriate alternative location for the interchange construction is already occupied and belongs to the area of another Spatial Plan which is in force too (red marked area on picture below). The process of changing the currently adopted Spatial Plans is very long and there is no guarantee they will be changed at all. All Project changes proposed by NGOs are in direct conflict with the adopted concept of the Belgrade City development.



2010 Detailed Regulation Plan for Ibarska road, zone close to Petlovo Brdo

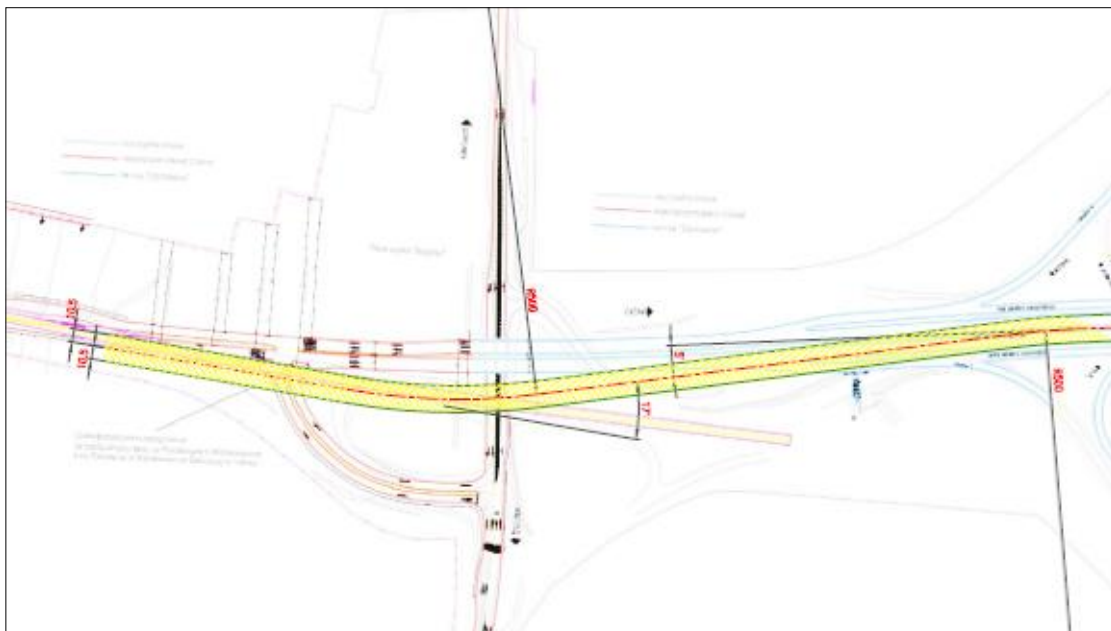
2. The costs of removing Ibarska road, even in case of changing of current Spatial plans, are high due to the fact that in that case a new Spatial plan should be adopted (it takes years), over 5 km of new double carriageway road should be designed and designs should be approved by relevant institutions (it takes years too), a new construction permit should be obtained, and finally the problem of financing remains as major one. This alternative was not acceptable to PERS because no advantages are recognised and existing unsafe junction will continue to be a threat to all road users.
3. The possible moving a PBI (as in the picture below) would unavoidably cause a demolition of significant part of the already constructed "Orlovaca" Interchange and the concept of the Belgrade By-Pass would be jeopardised.

Also, the current Ibarska road in the Petlovo Brdo Settlement and Park-Forest "Borici" zone would become a "dead end" street due to the fact that no connection with Ibarska road would exist or be possible in case of deviation of Ibarska road.



This proposal was also not feasible due to the fact that in this case it would require the construction of two instead of one intersection which lead to enormous costs and time loss. This idea is in direct spatial conflict with existing regulation plans (above elaborated "red zone") and Belgrade City master Plan.

From a standpoint of design, this is completely unacceptable, due to the spatial limitations and deflection angles which are much sharper than allowed ones for this type of arterial roads. Thus, enormous traffic safety risks will occur in this case. However, in case of adoption of minimum allowed deflection angles, a significant part or perhaps complete "Orlovaca" Interchange would have to be demolished.



After all the information was exchanged between PERS and PAP, an evaluation of the different Project alternatives was done. The result (presented in Table 01, page XX) shows that the Project alternative which is proposed by PERS is the optimal solution for PAP, road users, State and the whole community. It is sustainable and the adverse Project impact is mitigated to the maximum level.

## B. LIST OF QUESTIONS AND ANSWERS PROVIDED

The questions of the PAP and their representatives, as well as the replies supplied hereafter, are based on the draft Environmental and Social Action Plan for the new, Improved PBI Project which was officially delivered to EIB-CM, NGO GSPB and NGO PB.

PERS prepared the ESAP document taking into account the new interchange design presented during the meeting with representatives of Petlovo Brdo settlement. Among other Project related information, the Action Plan addressed the following issues:

- Compensation for the green area that will be destroyed
- Improvement of the forest layout
- Monitoring of the levels of noise and pollution
- Re-planting trees in higher density as appropriate mitigation measure aimed to reduce the negative impacts of noise and pollution.
- Moving and improving the recreational area of the Park-Forest “Borici”
- Analysis of measures aimed at improving the access to the settlement and ensuring alternative traffic connections and approaches to the Petlovo Brdo residents – owners of the residential and commercial buildings placed along the Ibarska road

PERS analysed measures to improve the access to the settlement and included in the ESAP document a new PERS Project proposal, which introduced new service roads for local transport, alternative approaches and possibilities for incorporating a new, additional junction to Ibarska road.

Question no 1: “It is also important to mention that a BINDING document is effective – a request of residents including at least 1,150 persons (probably even 1,600) – according to which any construction, not even in the smallest form, in any part of the park is prohibited. The same document further insists that “there is to be absolutely no negotiations on this matter” “.

Answer no 1: PERS understands the concerns raised by the complainants and during the last year PERS tried to find a sustainable, fair and acceptable Project alternative, which complies with the interest of Petlovo Brdo residents but also with the Interest of the Republic of Serbia, City of Belgrade and its population.

Having this in mind, PERS believes that NGO PB is informed that, besides the “binding document “ of NGO PB, many other relevant documents are in force too. In this framework, the most important documents are: Laws of the Republic of Serbia, Spatial and Regulation Plans of the Republic of Serbia, Government decision for declaring a Public Interest for construction of PBI, Ministerial decision regarding this Project, Consents on Detailed design of PBI obtained from 14 relevant Institutions, Belgrade City Master Plan for 2020, etc.

Besides the abovementioned binding documents, interest of 30,000 road users which are using Ibarska road every single day is also taken into consideration, together with the Belgrade City Development Requirements.

Additionally, it is PERS opinion that only a minor part of 1150 above mentioned persons participated during the Consultation Process. Less than 5% of complainants who signed the petition took part during the several rounds of Public Consultations.

Question no 2: “The newly proposed solution by the PERS envisages the devastation of a larger part of the park surface and a rising road at a height of approximately 4 meters at the very beginning with a gradual decline in the continuation. As a primary and immediately visible consequence, there will be air pollution as well as increased noise levels from the movement of motor vehicles, trucks and buses. “

Answer no 2: The newly proposed solution by PERS envisages the devastation of less than 10 % of park surface instead of 50% which was originally planned in case of implementing the Basic PBI Design.

Ibarska road is not raised 4 meters. The final level (height) of Ibarska road is exactly the same with current level, meaning no changes will be done in that sense.

Air and noise pollution and other Project impacts will not be a consequence of construction of PBI but remain a consequence of raising traffic load. It was clarified several times during the consultations that even in “do nothing scenario” negative impacts of traffic will remain as they are now, and will rise through the time, due to expected increasing traffic load.

PERS explained that the emission of noise and air pollutants can indeed be reduced by implementing a New PBI Project, due to the fact that wide new road will be more capacitive and will ensure smooth traffic flow, instead of the congestion PAP are facing there at this moment.

Question no 3: “As a direct consequence of such new air pollution, it will no longer be possible to spend time in the existing children’s playground in the greenery, more precisely in the remaining part, because one part will have been physically removed. The offer of PERS that a new surface be determined in the remaining part of the Park-Forest, arranged at their expense, is hypocritical, because this would mean that the residents would have to, on their own, determine a further 300 trees to be cut and would undertake on their own the new devastation of the Park-Forest at their behest. “

Answer no 3: It was explained by PERS environmental specialist that the most critical zone for playing and recreational purposes is exactly the zone close to highways, due to the fact that concentration of the air pollutants within the zone 10-15 m from roads are significantly polluted by air pollutants (greenery can reduce this impact only if green belt is wide enough. Single trees are not sufficient protection within this zone) and it is always recommended to all exposed residents not to perform their regular activities within those zones, if possible.

Considering “do nothing scenario”, Petlovo Brdo residents will continue to use this area instead of any other available surface, distanced from pollution sources (trucks and vehicles on Ibarska road). PERS believes that the potential pollution hazards are much bigger in that case.

Respecting above mentioned facts, PERS offered to PAP, as a compensation measure, to ensure safe, distanced and fenced recreational and resting area, within the heart of Park-Forest “Borici”. No single tree is planned to be cut in that case. No PERS representative ever stated that additional 300 trees should be cut, and PERS can confirm that there is absolutely no need to cut additional 300 trees.

The concept of recreational area is shown within the Annex 01 of this Final Report.

Question no 4: “Furthermore, the offer of PERS to plant "new" trees within the existing remaining part of the Park-Forest is only a reason for revolt. The residents are, we repeat once again, perfectly satisfied with the status quo and the form of greenery, and all we are asking is that no one interferes anymore, and to leave us in peace. Such proposals can only come from persons for whom greenery means very little.”

Answer no 4: Reforesting is an integral part of the PBI Project, as adequate compensation measure, together with plans for increasing density of trees, especially within the zone up to 30 m from Ibarska road. Detailed design of reforesting will be controlled and reviewed by the specialists engaged within the institutions relevant for park and forest protection.

On the other side, if this Project comes into implementation phase, it will be obligatory for PERS to perform all Project activities, including reforesting and compensation of green area, strictly according to approved Detailed Design. These activities will be controlled by Project supervision and by inspection of relevant Ministry and relevant City of Belgrade Institutions. Furthermore, PERS proposes to associate the representatives of the PAPs during the implementation phase, so that their opinions can be taken into account.

Also, according to adopted Detailed design of reforesting, a new green area will be ensured on the opposite side of the Ibarska road, where the actual road is now and within the loop of the access ramp.

The overall planted area will increase because Project consider the re-vegetation of the Western side of Ibarska road too, and planting inside the ramp loop.

Question no 5:“The detrimental impact of noise on the population living in the direct proximity is indisputable, as is the fact that a future stay in that wider area of park would be detrimental to health.”

Answer no 5: Noise impact will be mitigated by ensuring additional planting close to new Ibarska road. Levels of noise will be monitored according to the Project EMP – Monitoring Plan. Noise calculation is done during detailed design phase, noise maps are produced and it is calculated that no noise pollution is expected within the next 20 years within the houses placed behind the Park-Forest area.

According to the detailed design and noise propagation modelling, noise levels will grow due to traffic growth, but permitted level will not be exceeded. Within the next 20 years, in most exposed residential buildings, noise level will be under permitted 65 dB(A) for daily conditions, or 55 dB(A) during the night.

Noise impact will remain dominant for all commercial buildings placed along the Ibarska road, part out of Park-Forest zone.

Question no 6: “Neither should the detrimental impact of so-called "light pollution" be ignored, i.e. the impact of heavy lighting on the “Petlovo Brdo” ring road itself, as well as the headlights of vehicles on the access ramp, which would most likely at some point directly illuminate residential buildings (that is already a current situation). This means that residents exposed to air pollution would be further exposed to the detrimental impact of noise, also during night-time, under the impact of bright lights, and would most likely be forced to place blinds on the windows and draw curtains.”

Answer no 6: “Light pollution” will be mitigated by ensuring additional planting close to new Ibarska road. Comparing with “do nothing scenario” this pollution will be significantly reduced.

Question no 7: “To be clearer, a road with the intensity of traffic of the Bubanj Potok – Nis section of motorway, or over 31,000 vehicles daily on average with a tendency of further increase, would pass through a protective green layer closer to the residential buildings and area for recreation. Instead of the protective greenery there would be passing trucks, buses and passenger vehicles in two lanes over a small distance from the first row of residential buildings.”

Answer no 7: It is exactly the same traffic load which will occur in “do nothing scenario”. Traffic increase estimations are shown within the executive summary of this Final Report.

Question no 8: “The newly-proposed solution includes 3 traffic lights over a distance of only 750 metres. The section of the mentioned road according to the official data of Public Company “Putevi Srbije” is the busiest in all Serbia (of course not counting the “city section” Airport “Nikola Tesla” – Bubanj Potok. More precisely, more passenger vehicles, commercial vehicles and trucks, buses (31,000) pass along that section from the actual motorway Bubanj Potok – Nis. To make matters worse, a stopping lane is not envisaged at 750 meters of the section, but 3 traffic lights are. Is it realistic to assume that 3 traffic light would be placed on the motorway Bubanj Potok - Nis 3? Clearly, after placement of the traffic lights the same would be very quickly removed because they would cause a traffic collapse.”

Answer no 8: Several different Project alternatives were proposed to PAPs during the consultation process. One of them remains as a PERS final proposal. This proposal doesn't have “3 traffic lights”. Only one surface junction with traffic lights is included within this Project alternative (the one at Djuje & Dragoljuba Str.) but existence of proposed junction will be confirmed by City traffic safety authorities too.

Question no 9: “It is further to be expected that the entry-exit of Petlovo Brdo to the Ibarska road would also be permanently closed. After 45 years the entire settlement of over 20,000 people would lose their only traffic connection. “

Answer no 9: Basic Project design took into account that all current illegal approaches to Ibarska road are unsafe and the designers proposed to close these illegal unsafe connections. Instead of them, the designers proposed the alternative connections by using two safe intersections in the zone of Petlovo Brdo settlement.

Respecting complaints received by PAP, PERS asked the designers to analyse and offer possible Project alternatives. As a result of that, a new, safe junction, supplied with traffic light, at Djuje & Dragoljuba Str. is integrated in the final PERS proposal.

Question no 10: “Taking all the aforementioned into consideration, it could reasonably be asked: did anyone even consider undertaking analyses and calculations to determine how the illness of people under influence of vehicle emissions would be increased? While the greater safety and health of participants in the traffic that would be passing by on the mentioned road along our settlement is already insisted on, it is reasonable to ask the question: is anyone concerned about our health, the health of our children and our parents, elderly persons and pensioners who are using the current park that has been preserved in a very beautiful condition for everyday walks. Such professional analysis has hitherto not been presented. It should definitely not be forgotten that the "expert" services that were competent have already issued their opinion that there are no negative effects on the population, or in a milder form that such research is unnecessary. We could now ask many questions regarding those "expert" services and institutions that were given responsibility for our health: how is it that suddenly there is a need to alleviate negative impacts which in fact never existed? “

Answer no 10: EIA procedure is done according to Law, and the stakeholder engagement was integral part of this activity. The Project impact and adequate mitigation and compensation measures are analysed and adopted as integral part of this Project.

All relevant institutions were consulted and gave their Consent on the Detailed design and proposed mitigation, compensation and monitoring Plan. Traffic increase estimations are shown within the executive summary of this Final Report.

Question no 11: “The “EIB” bank and PERS do not want to talk at all, and they are absolutely NOT interested in what happens beyond 750 meters of "their" road. Such an irresponsible attitude is scandalous. The fact that the territory for which city institutions are responsible begins after those "first" 750 meters doesn't mean that the problem should be "shoved" to them if they can't solve it. The first thing that can immediately be seen is that already in the first 300 metres the placement of an additional 2 traffic lights would be needed to satisfy the needs of commercial buildings, primarily the largest manufacturing plant, the "Zomont" factory that has already for some time been supplying more than 450 small businesses, which are purchasing their semi-finished products and supporting their families. This means that with suspension of good access to this manufacturing plant, many households would lose their jobs.”

Answer no 11: Belgrade City Master Plan for 2020, Spatial Plans of Belgrade Highway By-Pass and Regulation plan of Ibarska road are fully harmonised and each of them confirms that current Ibarska road will be widened on west side, becoming capacitive dual carriageway:



Example of Dual carriageway concept of future Ibarska road within the Park-Forest zone

PERS is responsible for implementing first phase – a 750 m long connection to “Orlovaca” interchange, as an integral part of Belgrade Highway Bypass concept. Remaining 3 km towards Belgrade are not under PERS jurisdiction, but under jurisdiction of Belgrade City authorities.

Question no 12: “Residents are unanimous in the opinion that the manner in which the representatives of "EIB" bank and PERS have been informing the public is inadequate and insufficient for the affected population. The first objection is the way of notifying and informing residents – an almost identical erroneous process that led to the current problems arising – as an advertisement was placed in the daily newspaper "Politika" that very few people read. Even those who buy the print edition rarely read the ads and public pronouncements. The electronic version of "Politika" has no ads at all. Residents used to be informed of such important events through a notice affixed to all traffic areas where people move around. Instead, just one small portion of the settlement, that is the park area, was incorrectly informed.”

Answer no 12: Invitation to Public Consultations is placed on PERS web site too. Flyer text to be delivered by the NGOs to the mailboxes of the residents was agreed with both NGOs. Petlovo Brdo residents were additionally invited by placing over a 50 invitation flyers at different zones of settlement (BUS station, Park-Forest Borici, Constructor building etc.

PERS delivered official invitation (by E-mail and official letter) to NGO PB on 29 April 2014, informing them that Action Plan is placed on PERS web site and that Official Public Invitation will be announced in daily newspaper “Politika”. PERS asked NGO PB to check and confirm the flyer text and text of the public announcement as well.

It was verbally agreed with NGO's members to deliver the flyers to maximum possible number of their neighbours respecting the fact that they are representing 1500 residents as they previously declared.

PERS wishes to thank NGO PB for their help during invitation of PAPs. Instead of answer on NGO PB complaints, PERS can confirm that EIB was informed by E-mail from 29 April 2014 that :

- Draft texts of Public Announcement are already delivered to Mr. Vladimir Markovic (NGO GSPB) and to Mr. Dejan Jovanovic (NGO PB) for their confirmation and/or eventual corrections. Final version will be published on PERS web site and daily newspaper "Politika"
- PERS sent an official Invitation Letter to both NGOs today (via E-mail and as official letter), as well as Invitation Letters to other relevant institutions

Apart from these, and since 2013 there was a large number of meetings organised with representatives of both NGOs (dates could be included here) as well as various exchanges of information, either in paper or electronic version. In its replies PERS tried to provide replies to the questions asked by the NGOs.

Question no 13: How much is the fee for changing purposes of forests? Who estimate the value of subject fee?

Answer no 13: PERS doesn't have the information requested. Please contact the competent authority.

Question no 14: How the value of subject fee is estimated?

Answer no 14: PERS doesn't have the information requested. Contact the competent authority.

Question no 15: How big is area with trees which will be cut and is Government of Serbia precociously determined this particular surface?

Answer no 15: According to the PERS final proposal, presented within the Action Plan and during process of consultations with PAPs, area with trees which will be cut is 0.78 ha. Government of Serbia never declared or recognised this area, or even all park forest Borici as protected zone. It is confirmed by obtaining necessary Project preconditions from Institute for Nature Protection of Serbia.

At the contrary, this area is strictly recognised and prereserved as project area aimed for Petlovo Brdo Interchange Project only. It is confirmed by numerous government planning acts, and in several City of Belgrade spatial Plans. Waiting for the appropriate moment for project implementation caused that park forest Borici is spread within this zone. Area aimed by the government plans for Project implementation is presented on the picture bellow:



But PERS developed a new design, presented within the Action plan, which spare additional 1,5ha of the forest within the construction zone, as it is shown on picture below:



Question no 16: Whether this applies to entire expropriated area of (approximately) 5,15 ha?

Answer no 16: Not a single tree within the forest park "Borici " is "marked for cutting" yet. Depending on the adopted design alternatives, the surface part of the forest park that would be exposed to cutting trees for the construction of the PBI varies from a minimum of 0.78 ha and a maximum of 1.16 ha. This data is repeatedly presented to the public during the public consultations.

The area aimed for the construction of PBI is defined by the Regulatory Plan for E -75 / E -70 highway, section Dobanovci – Bujanj Potok. With the decision of the Serbian Government the public interest for expropriation is established for construction of the E -75 / E -70 highway, section Dobanovci – Bujanj Potok, in accordance with the Law on spatial planning.

Question no 17: NGO GSPB “find out that on April 02<sup>nd</sup> PERS requested permit for cutting 1500 trees which are placed within the expropriation (land acquisition) zone of PBI Project”. Which is the purpose of request for cutting all the trees while negotiations are about minimum cutting of trees?

Answer no 17: PERS did not submit a request for permit to cut trees in the area of forest park "Borici" to any institution. On 4 February 2014 PERS submitted to the PUC "Greenery Belgrade" request for Consent on Detailed Design of the PBI Project (Book 11, Project of Reforesting). This book only treats the basic design solution, approved by the technical control. Consent is requested in accordance with the regular procedure, given that so far obtained the remaining 13 approvals by other competent institutions.

Incorrect data is that by the basic design solution 1500 trees would be cut. Exact data is that according to the Basic PBI design an 894 trees was planned to be cut, at an approximate area of 160 acres, used from 240 acres available by Interchange Spatial Plan. We remind you once again that representatives of the PERS offered to Petlovo Brdo residents an alternative design that take up significantly less area forest park (78 acres) , and the limits of intervention of an alternative Project was clearly marked on the ground during the public consultation. The number of trees that would be exposed to cutting in case of application of the alternative Project would be under a rough estimate of less than 150. We believe you your neighbours could realised that after the field visit taken with PERS representatives.

Question no 18: Does the value of the original and alternative Project included the cost of these fees?

Answer no 18: Permission for cutting trees, as well as the cost of fees will be prescribed by the competent institution - Directorate for Forests, according to the Project design that will be submitted depending on decisions of the EIB regarding (non)implementation of this Project.

Question no 19: Do EIB approve a loan including this charge?

Answer no 19: Please contact EIB to provide to you answer on this question.

Question no 20: Will this fee be paid to the Ministry of Agriculture and Environment? At what point will it be paid?

Answer no 20: The answer on this question can be obtained from the Ministry of Agriculture and Environment. And of course, PERS will, as in all other Projects, timely pay all legal fees.

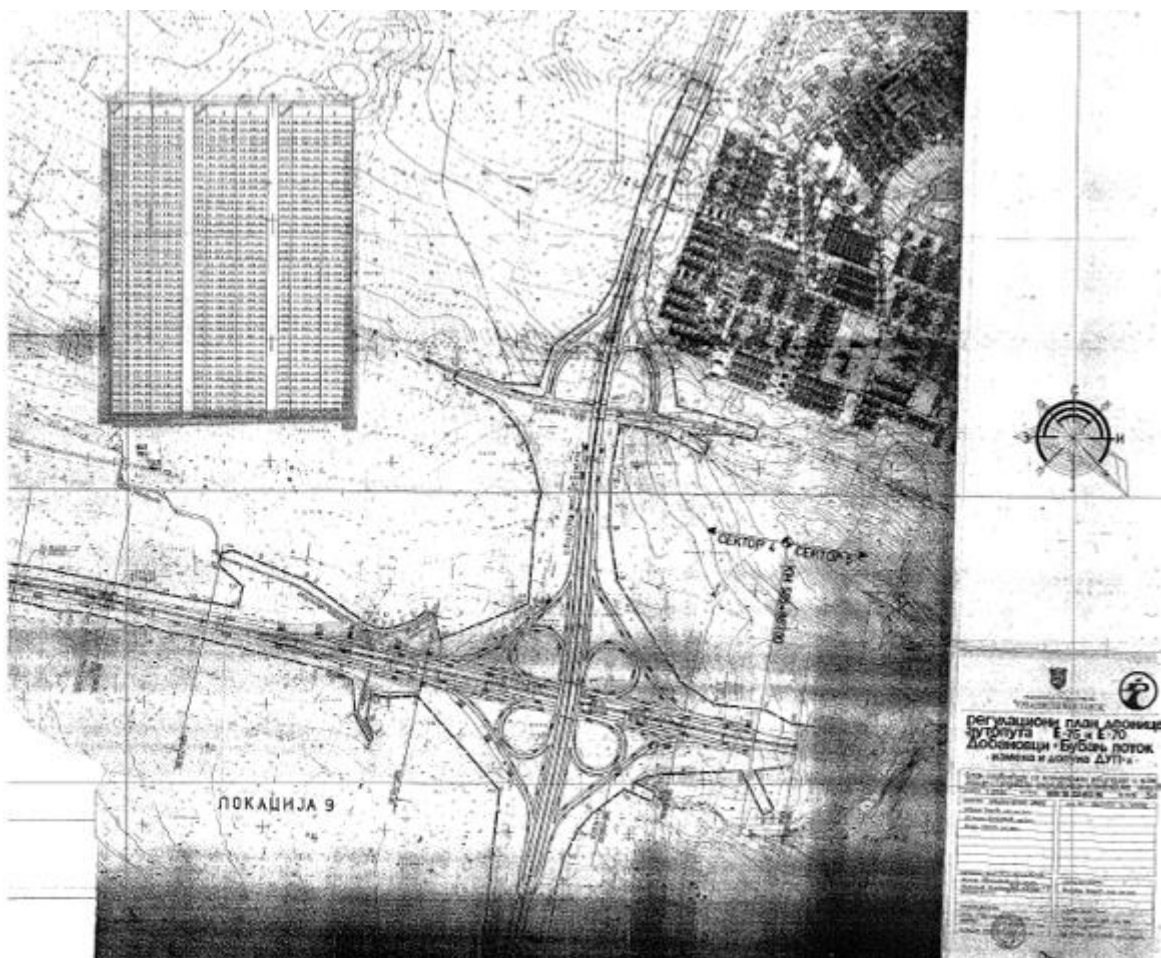
Question no 21: Do some law allows cutting of the forest without the payment of compensation for the change in use?

Answer no 21: We do not know.

**Question no 22:** Is it true that Orlovaca Interchange is moved 50m from the originally aimed area, defined by existing spatial plan, ensuring the area for Orlovaca cemetery spreading?

**Answer no 22:** No, Orlovaca Interchange is constructed exactly within the originally aimed area, defined by existing spatial plan. (Original Spatial plan is shown to the interested public during several round of consultations. First time it was shown during consultation in PERS premises, second time during meeting with NGO Zeleno naselje Petlovo Brdo, third time during consultations with PAPs 2014, and it is also confirmed by Action Plan which was publicly disclosed.

However, once again, Existing regulation plan for Orlovaca interchange, produced by Highway Institute Belgrade, responsible engineer Velibor Gordic, is available within the PERS premises, Vlajkovicева 19a Belgrade, and could be delivered on any request to interested parties (contact: igor.radovic@putevi-srbije.rs) . Additionally, for the purpose of this Final Report, Plan is shown on a picture below:



**Question no 23:** Will PERS change existing, already adopted spatial plans in order to move proposed alignment on western side, behind the “Metro” Supermarket?

**Answer no 23:** PERS is not allowed to adopt or change any spatial plan. PERS is requested to construct and maintain the road network strictly according to the Law

and adopted spatial plans. The area PAP recognized as suitable for the new road alignment is occupied by another user, respecting the other existing adopted spatial plan (pages 26, 37 and 40).

Question no 24: Is EIB practice to finance Projects which can include cutting trees within the forest area?

Answer no 24: Sometimes. Not cutting any trees would make it impossible to construct any infrastructure Projects. If the value of the trees is not high, trees can be cut provided that adequate compensation measures are ensured, in amount and type of vegetation lost.

Question no 25: EIB interest is to plasmin the capital, nothing else.

Answer no 25: Not true. The EIB is interested in seeing the implementation of a Project that increases the traffic safety while at the same time protecting the environmental and social conditions in the area. This is the reason why came already three times to Serbia to discuss this specific Project and proposed to engage the mediation process in order to make sure that citizens' concerns are addressed.

Furthermore the EIB operates on a non-profit basis with the mission to contribute to the balanced and steady development of the European Union and beyond.

The EIB is however limited in the actions it can take vis-à-vis the local authorities. We can only act in the framework of this particular Project to ensure that it complies with our environmental and social standards. For any questions that go beyond the scope of the Project the EIB has no capacity to act.

Question no 26: Is it a loan or donation?

Answer no 26: It is a loan. The EIB provides finance and expertise for sound and sustainable investment Projects which contribute to furthering EU policy objectives. The vast majority of EIB financing is through loans (as is the case here), but it can also offer guarantees, microfinance, equity investment, etc.

Question no 27: Which are the plans for “red zone”?

Answer no 27\*: The existing planning document which covers the “red zone” is named “Plan of Detailed Regulation (PDR) of Ibarska road from Mihajla Petrovica Str. To Belgrade highway By-Pass, parts of Cukarica and Rakovica municipalities”. Plan is developed by Urban Planning Institute of Belgrade (UPI) and it is published in Official Gazette No. 33/10. Contacts of respective institution are:

Public urbanistic company  
Urban Planning Institute of Belgrade (UPI)  
30 Palmoticeva St.  
11000 Belgrade, Serbia  
phone: +381 (0)11 3331 500  
E-mail: office@urbel.com

Strategic and Operational Planning is core activity of UPI. Urban Planning Institute of Belgrade designs spatial and urban plans, studies, analysis, Projects and also carries out consultation activities. What they particularly have in mind is the

economic feasibility of suggestions and solutions for the development and construction of the City.

Legal framework of UPI work is regulated by laws on organization, management and spatial planning. Those are: Law of Planning and Construction (Official Gazette of Republic of Serbia br. 72/09, 81/09-correction, 64/10US and 24/11), Law on the Capital (Gazette of Republic of Serbia br.129/07), Law on Local Government (Gazette of Republic of Serbia br.129/07), Law on Local Government Financing (Gazette of Republic of Serbia br.62/06), The Statute of the City (Gazette of Republic of Serbia br.39/08) and other laws and bylaws.

The ‘red zone’ is covered with adopted Master Plan of Belgrade which was made by the Urban Planning Institute of Belgrade in 2003 – the Master Plan of Belgrade 2021 ("Official Gazette of the City of Belgrade" no. 27/03).

Graphics of the Belgrade Master Plan comprise:

Planned land use (2021)

Planned transport (2021)

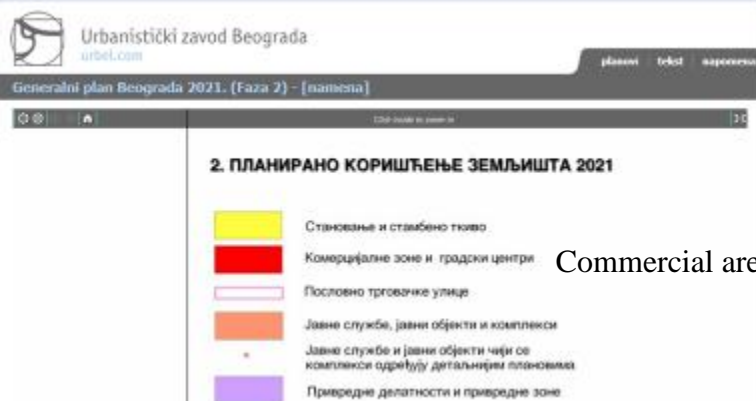
Planned commercial areas and city centers (2021)

Urban instruments for implementation of the plan

Review of the changes to Master plan with regards to planned land use

Review of the changes to infrastructural systems

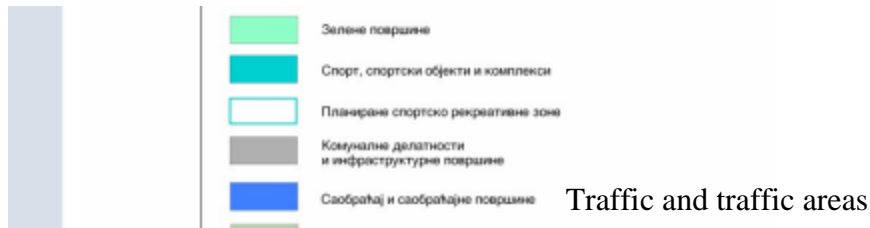
- Belgrade Master Plan - Planned land use (2021)



Commercial areas and city centers

Green areas – parks and forests

Petlovo brdo Interchange Project – Environmental and Social Impact Assessment  
20150827 FINAL Report on Public Consultations



“Red zone” is marked on above mentioned graphics that can be found at following link: <http://mapa.urbel.com/silverlight/gp/?src=namena>

Question no 28: What is the reason for placing the proposed alignment close to residential area instead of placing it within the empty zone on the other (western) side of the road?

Answer no 28: PERS has moved proposed alignment on the western side as much as possible, but within the area defined by Spatial Plan. As already mentioned PERS can only act within the limits of the Spatial Plan.

Question no 29: Why PERS do not change existing Spatial plans?

Answer no 29: It is not under PERS jurisdiction. NGOs could nevertheless contact the authorities to obtain that change but that would be a lengthy process. However, when such a process is initiated, all current areas in the special planning will come under scrutiny, including the existing green areas.

Question no 30: Why municipality of Rakovica representatives do not participate in these public consultations?

Answer no 30: Municipality of Rakovica and City of Belgrade representatives were invited to participate but did not come.

Question no 31: Park-Forest “Borici” is of great importance to local residents. Therefore, we reject any Project alternative which include cutting even a single tree. It is a recreational area.

Answer no 31: Full compensation measures are proposed by PERS. All trees will be replanted and new recreation area will be arranged and supplied with sufficient number of benches, tables and children playgrounds (Action Plan, pages 27. and 28.). PERS invites interested citizens to continue working with us for the design and implementation of the compensation measures.

Other compensation measures include fencing and additional lightening in the intersection zone. Following basic ideas for compensation of Park-Forest recreate content were presented to PAPs during consultations:



PERS representatives explained to PAP that despite a quantitative loss in the overall usable area, the aim is to have a quality gain.

Question no 32: City development Institution refuses to discuss this issue with us. “Red zone” is restricted zone but Petlovo Brdo residents refuse to accept that as final solution. Citizens invite EIB to join them to fight against state institutions.

Answer no 32: As already mentioned before, the EIB has no remit to act or deal with Serbian institutions outside the remit of the Project.

Question no 33: What is the distance between motorway and closest houses within the Park-Forest zone?

Answer no 33: Proposed Project alternative ensure 60m distance from closest house. Other houses within the park-forest “Borici” are at least 80-120m away from motorway (Action Plan, pages 5. And 22.).

The current minimum distance of a house from the road pavement is 83 m:



- the new closest distance from the road pavement is 71 m:



- the biggest reduction in distance compared to now is 12-15 m:



Question no 34: A certain number of owls and hedgehogs live within the park-forest „Borici”. It is necessary to determine real importance of park-forest.

Answer no 34: (Maja Radosavljevic, Institute for Nature protection) park-forest Borici is not a naturally protected area and current approach of INP is that park-forest “Borici” does not meet the criteria to be recognized as protected area. Nevertheless, impacts will be reduced to the minimum. EMP document is already prepared as integral part of Detailed Design and detailed inventory of the fauna and flora were made, based on preconditions obtained from relevant institutions. Appropriate measures and monitoring program is prescribed in order to protect the species and maintain or recreate the respective habitats. The alternative proposal made by PERS which would still maintain 85 to 90% of the forest, and compensate for the 15-10% to be destroyed would not significantly affect the livelihood of these animals.

Question no 35: It is not clear what is planned with Djuje & Dragoljuba Street and current unsafe connection with Ibarska road? What about the park in Gocka Street?

Answer no 35: It is planned to construct a new, safe, surface intersection supplied with traffic lights in zone of crossing Djuje & Dragoljuba Street and Ibarska road.



Safe approach to Ibarska road will be ensured through surface junction at Djuje & Dragoljuba Str. (white circle on above drawing). Traffic light and other equipment of surface junction will be considered by City authorities and other experts during junction design phase. Traffic safety will be additionally analysed by traffic safety experts and their recommendations will be taken into account too.

Junction in zone of Djuje & Dragoljuba Street will be part of separate Project, preparation of which could start immediately after a final EIB decision regarding this Project is received.

Gocka Street and its Park will not be under Project impact due to the fact that they are completely out of the wide Project zone.

Question no 36: Are the existing water and gas infrastructure safe from Project impacts.

Answer no 36: Yes, they are properly treated within the detailed design. Protection measures are part of Design. Book 10 of detailed design (Technical Infrastructure) and Book 15 (Relocation of water supply infrastructure) contain technical solutions which will be implemented in order to protect water and gas infrastructure safe from Project impacts.

Additionally, mitigation measures for protection of surface and underground water are already prescribed within the detailed design of environmental protection (Book 08) and Action Plan (pages 40, 50, 51, 52 and 53).

Question no 37: Air pollution problems? Who will ensure non-worsening of existing condition regarding air pollution.

Answer no 37: Monitoring program is consisting part of Environmental and Social Action Plan. Air parameters will be monitored before Project execution, during construction works and after, during operation phase of road. Results will be publicly presented and available on PERS web site. Constant monitoring has been envisaged for when there are residential buildings located closer than 200 m. In the case of a complaint from a local resident, monitoring of the effects may be organized at that time.

The Contractor will also ensure a preliminary testing (“zero monitoring”) of air pollutants according to the Monitoring Plan of this ESAP document. “Zero monitoring” air pollution measurement will be performed at early Project phase, before commencement of any construction activities, while Ibarska road is still in operation phase.

Additional measurement will be done periodically, according to the Monitoring Plan (chapter 6.6 and App II of ESAP). Air Monitoring will be performed four times a year, during construction and interchange operation period, on maximum 5 representative residential buildings.

As appropriate mitigation measures, reforestation is planned as integral part of Project. It is planned to increase density of trees in the zone close to Ibarska road according to the Book 11 of detailed design (Reforestation of the road belt). A planting of new trees is consisting part of the Project.

The overall planted area will increase because Project consider the re-vegetation of the Western side of Ibarska road too, and planting inside the ramp loop.

Indicative figures of overall forest area, number of compensated trees and exact position of each particular tree is given within the Book 11 of detailed design.

However, 90% of trees will remain where they are now, and will additionally block spreading of air pollutants into residential zone.

Question no 38: Is any noise barrier planned to be erected within PBI Project?

Answer no 38: No noise barriers are planned to be constructed within the Project.

Republic of Serbia

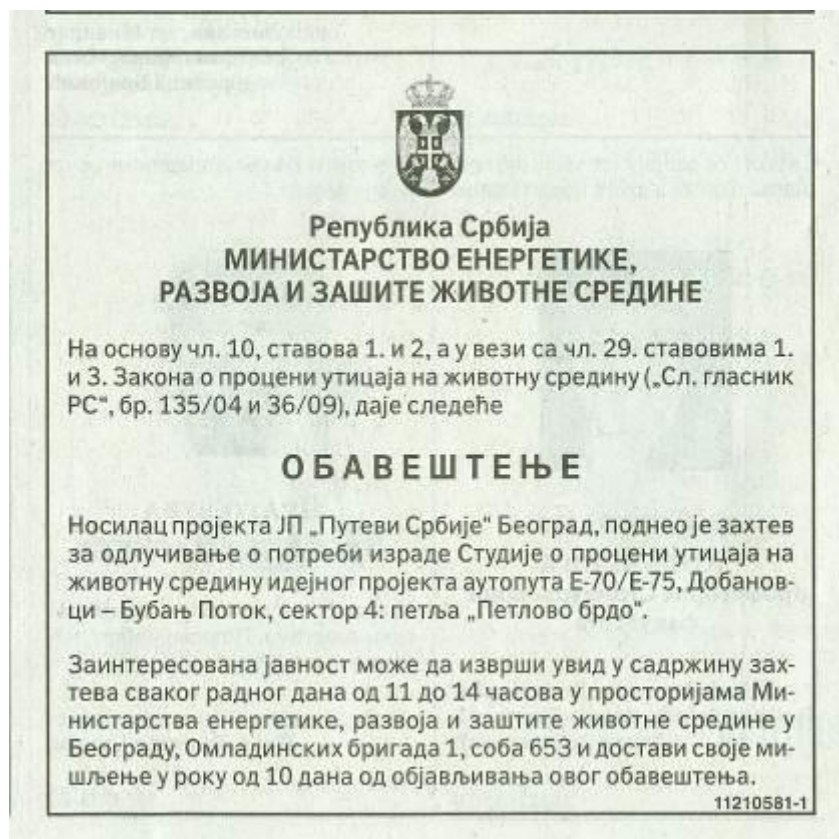
Ministry of Energy, Development and Environmental Protection of R. of Serbia

Pursuant to Article 10, items 1 and 2 with regard to Article 29, items 1 and 3 of the Law on EIA ("Official Gazette" RS. no: 135/04 and 36/09) is issuing the following:

### ANNOUNCEMENT

The bearer of the Project PE "Roads of Serbia" Belgrade, has submitted request for determination of the need for preparation of EIA Study for the preliminary design Highway E70/E75 Dobanovci – Bubanj Potok, sector 4: interchange "Petlovo Brdo".

The interested public is welcomed to review the content of the request every working day from 11 to 14 h at the premises of the Ministry of Energy, Development and Environmental Protection of R. of Serbia in Belgrade, Omladinskih brigade 1, room 653 and submit its opinion within 10 days from the day of publication of this announcement.



Republic of Serbia  
Ministry of Energy, Development and Environmental Protection of R. of Serbia

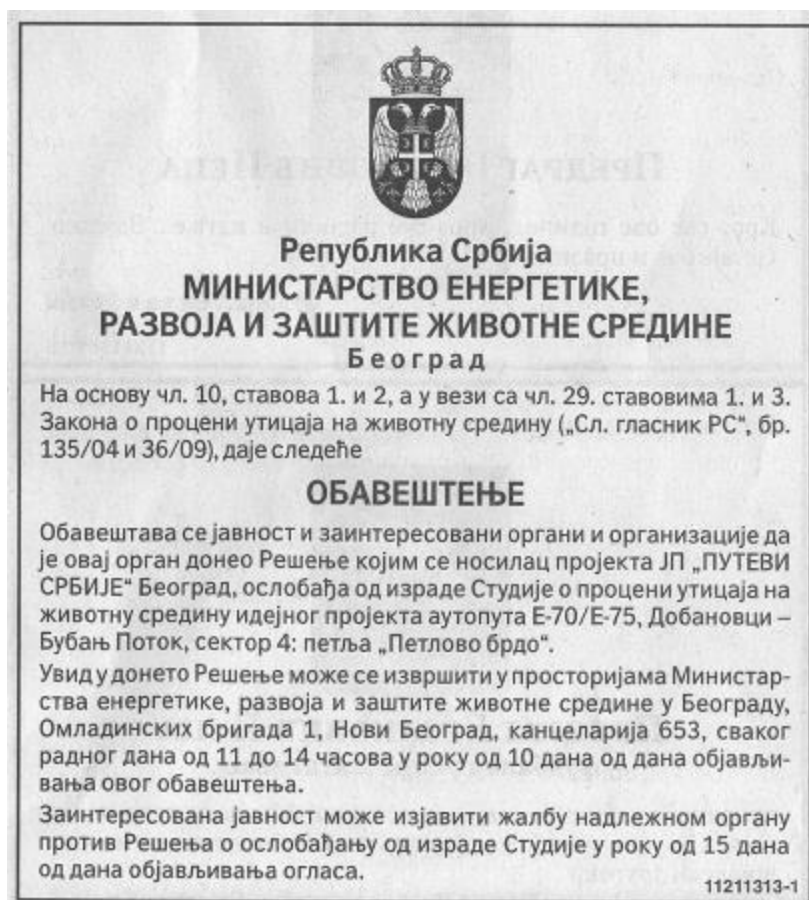
Pursuant to Article 10, items 1 and 2 with regard to Article 29, items 1 and 3 of the Law on EIA ("Official Gazette" RS. no: 135/04 and 36/09) is issuing the following:

### ANNOUCMENT

We inform the public and all interested Bodies and Associations that this Ministry has reached a Decision that the bearer of the Project PE "Roads of Serbia" Belgrade, has no requirement to prepare EIA Study for the preliminary design Highway E-70/E-75, Dobanovci – Bubanj Potok, sector 4: interchange "Petlovo Brdo".

Any interested party may review the Decision every working day from 11 to 14 h at the premises of the Ministry of Energy, Development and Environmental Protection of R. of Serbia in Belgrade, Omladinskih brigade 1, room 653, within 10 days from the day of publication of this announcement.

The interested public may file a complaint against the Decision related to the release of obligation for preparation of the Study within 15 days from the date of the public announcement.



Annex 05





PE “Roads of Serbia” issues an invitation for

## **PUBLIC INFORMATION MEETING**

for the public, bodies and organizations interested in

### **ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) FOR “PETLOVO BRDO” INTERCHANGE PROJECT**

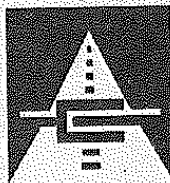
The purpose of the meeting is to inform the citizens about the new design, reply to questions and address the Project affected people’s concerns. All citizens are welcome to attend the meeting, make comments and ask questions related to the new design.

Public information meeting and presentation of the subject ESAP document will take place on 17 May 2014, at 09:00 AM (local time), on the premises of “Kulturni centar Rakovica”, Miska Kranjca Street No.7, Rakovica. Representatives of the European Investment Bank (EIB) will also be present.

Interested parties can get an insight into the ESAP document on following addresses:

- the premises of the PE „Roads of Serbia”, 19a, Vlajkovicева St., Belgrade, on the first floor, on working days from 11:00 AM to 01:00 PM (local time), within 20 days in regards to the date of public announcement of this invitation.
- on PE „Roads of Serbia” web site: <http://www.putevi-srbije.rs>
- the premises of NGO “Green settlement Petlovo Brdo”, Milorada Draskovica 24a, on working days, within 20 days in regards to the date of public announcement of this invitation.
- the premises of NGO “Petlovo Brdo”, Milorada Draskovica 24a, on working days, within 20 days in regards to the date of public announcement of this invitation.

Remarks and suggestions in regards to the ESAP document shall be submitted in written form to the PE „Roads of Serbia”, 282, Bulevar kralja Aleksandra St., Belgrade. Citizens are also welcome to send their comments/questions to the following e-mail address:  
[igor.radovic@putevi-srbije.rs](mailto:igor.radovic@putevi-srbije.rs)



**ЈП „Путеви Србије“**

позивају на

## **ЈАВНЕ КОНСУЛТАЦИЈЕ**

### **Јавност, органе и организације заинтересоване за АКЦИОНИ ПЛАН ЗАШТИТЕ ЖИВОТНЕ СРЕДИНЕ И УТИЦАЈА НА СОЦИЈАЛНО ОКРУЖЕЊЕ (ESAP) ЗА ПРОЈЕКАТ ПЕТЉЕ „ПЕТЛОВО БРДО“**

Сврха консултација је да се грађани упознају са предвиђеним активностима на реализацији пројекта, пруже одговори на питања и дају потребна објашњења грађанима који могу бити изложени утицајима овог пројекта. Јавност је добродошла да присуствује консултацијама, поставља питања и даје коментаре у вези са пројектом.

Јавне консултације и презентација предметног Акционог плана биће одржане 17. 5. 2014. године, са почетком у 9 часова у просторијама „Културног центра Раковица“, Мишка Крањца 7, Раковица. Консултацијама ће присуствовати и представници Европске инвестиционе банке (ЕИВ).

Увид у предметни Акциони план може се извршити:

- o у просторијама предузећа ЈП „Путеви Србије“, Влајковићева 19а, Београд, први спрат, сваког радног дана од 11 до 13 часова у року од 20 дана од дана објављивања овог обавештења;
- o на интернет страници предузећа ЈП „Путеви Србије“: <http://www.putevi-srbije.rs>
- o у просторијама Удружења „Петлово брдо“, Милорада Драшковића бр. 24а, у року од 20 дана од дана објављивања овог обавештења;
- o у просторијама Удружења „Зелено насеље Петлово брдо“, Милорада Драшковића бр. 24а, сваког радног дана од 12 до 13 часова у року од 20 дана од дана објављивања овог обавештења;
- o на интернет страни – блог <http://zelenonaselje-petlovobrdoblogspot.com> С обзиром на то да је предметни Акциони план на енглеском језику, сваком кога занима садржај документа, објашњења ће бити достављена електронском поштом;
- o следећа два викенда суботом и недељом (3, 4, 10. и 11. маја 2014) од 12 до 13 часова у шуми „Борићи“ на подручју уз раскрсницу Ибарског и Кружног пута у року од 20 дана од дана објављивања овог обавештења.

Примедбе и мишљења на Акциони план се подносе у писаном облику и достављају на адресу ЈП „Путеви Србије“, Булевар краља Александра 282, Београд. Своја питања и коментаре грађани могу доставити и електронском поштом на следећу Е-mail адресу: [igor.radovic@putevi-srbije.rs](mailto:igor.radovic@putevi-srbije.rs)

За додатне информације обратити се на следећу адресу:

**ЈП „Путеви Србије“**  
Булевар краља Александра 282  
11000 Београд, Република Србија,  
тел./факс +381 11/30 34 744  
e-mail: [igor.radovic@putevi-srbije.rs](mailto:igor.radovic@putevi-srbije.rs)

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**Annex 08**

