

Environmental Impact Management Services (Pty) Ltd  
Registration Number: 92/05927/07  
Directors: T. Nkhahle, A. Smith, L. Whitlow



Leaders in Environmental Management

25 April, 2012

Our ref: GPK/gpk/0916(B)

South African Heritage Resources Agency  
PO Box 4637  
Cape Town  
8000

**Dr Mariagrazia Galimberti**

Dear Madam:

**PROPOSED RECONSTRUCTION OF FLEET STREET BETWEEN STATION ROAD  
AND FITZPATRICK ROAD, EAST LONDON**

Environmental Impact Management Services (Pty) Ltd (EIMS) was recently appointed to investigate the requirements of the relevant environmental legislation pertaining to the above-mentioned activity and to confirm our opinion with the Competent Environmental Authority.

From this investigation, it was our understanding that the reconstruction of the section of Fleet Street from the intersections with Station Road to the intersection with Fitzpatrick Road may not require any environmental authorisation process to be followed in terms of the National Environmental Management Act (Act No. 107 of 1998 - NEMA) or the 2010 Environmental Impact Assessment (EIA) Regulations.

Despite the fact that an environmental authorisation may not be required, it is understood that the project would be subject to the requirements of Section 38 of the National Heritage Resources Act (Act No. 25 of 1999 – NHRA).

**Brief description of the project:**

The section of road that will be affected is the section of the R72 known as Fleet Street in East London that stretches from Station Road in the West to Fitzpatrick Road in the East. Please refer to the locality map attached in Appendix A.

It is understood that the proposed reconstruction has become necessary for the following reasons:

- Fleet Street is a major thoroughfare through East London connecting to the N2 on either side. It experiences extremely high traffic volumes and heavy vehicles on a daily basis and hence is subject to a high amount of wear and tear;
- Fleet Street is also the only link between the Transnet Container Terminal located in the harbour and West Bank;

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- In general, the services in the area are old and have surpassed their design life. Existing sewer manholes located within the roadway have been damaged by the heavy vehicles and pose a threat to motorists and pedestrians; and
- Changes in traffic patterns due to the soon-to-be-implemented Bus Rapid Transit System need to be catered for.

With reference to the site plans attached in Appendix B, the reconstruction will take place entirely within the existing road reserve, which has a width of 29.84 metres. The current road surface has a width of approximately 21.3 metres. Briefly, the proposed reconstruction of the road will involve:

- Removal of the existing road layers and services within the road reserve;
- Construction of new road layers to a total width of 24 metres, thereby adding an additional lane in each direction; and
- Installation of new services including water and sanitation, electrical and telephone and data services.

Several potential heritage features are located along the section of road, including the stone sidewalk curbing and storm water conduits older than 60 years. As such EIMS has appointed a suitably qualified Heritage Consultant in order to investigate and report on the potential heritage features along the affected section of Fleet Street.

#### **Public Participation Requirements:**

It is understood that Section 38(3)(e) of the NHRA requires that *“the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources”* be taken into consideration. During previous discussions with SAHRA and ECPRHA has been informed EIMS that there is no set process for engagement with the public in terms of this section of the NHRA and it was recommended that the requirements as stipulated in Regulation 54 of the 2010 EIA Regulations (Government Notice R. 543) be used as a guideline for engaging with the public.

In line with this request, EIMS will the following be undertaken:

- Placement of 5 English A2 size, laminated notices at relevant road intersections in close proximity to the site;
- Placement of 10 English A3 size, notices at various public places in close proximity to the site;
- Distribution of A4 notices to surrounding land owners/ occupiers of the sites;
- Distribution of A4 notification to the relevant municipal ward councillors, as well as any known rate payers or community based organisations;
- Distribution of A4 notification to the relevant local authorities, as well as any other obvious organ of state having jurisdiction regarding the proposed activity;
- An advertisement will be placed in the legal section of a local newspaper; and
- One public meeting will be scheduled at a suitable location. The findings of the HIA Report will be presented during the public meeting;

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- Compilation of a Issues and Responses Report (IRR) for submission together with the findings of the HIA; and
- Submission of the HIA and IRR to the SAHRA and ECPHRA for review and comment.
- Allow a 14 day comment period commencing on 26 April 2012 and ending on 10 May 2012.

Should you have any queries or concerns, please feel free to contact the undersigned.

Sincerely,



**GP Kriel**