

Greenmined Environmental
106 Baker Square
De Beers Avenue
Somerset West

Attention: Christine Fouche

Dear Christine,

TOWN PLANNING MOTIVATION FOR THE IMPACTS OF THE QUARRY EXPANSION ON SURROUNDING PROPERTIES

The owner of the property, Portion 1 of Farm 652 East London, intends to extend the existing mining footprint of Wansley Quarries to 37,8 Ha as part of an expansion of the quarry due to its projected economic growth and need for the availability of additional natural resources.

As is shown in the attached Mining Plan, it is proposed that the mine will expand inwardly toward the Northern Boundary of the Farm Portion which is in line with the available Dolerite deposits that are being mined. The below section will illustrate how this mining expansion aligns with Town Planning legislation and best practices as well as including the merits of this particular land use within its contextual surroundings.

SPLUMA Principles

The Spatial Planning and Land Use Management Act (SPLUMA) governs all spatial planning and land use management matters. Further to this, the five SPLUMA Principles are used to guide all legislative processes that apply to this act. In essence the SPLUMA principles guide all land development matters and are used to protect all citizens of their land rights.

The below section indicates how the proposed quarry expansion aligns with the five SPLUMA Principles.

SPLUMA Principles	Quarry Expansion
Spatial Justice	<ol style="list-style-type: none"> 1. Spatial Justice protects land owners from discrimination of any kind. This extends to both home ownership and business interests. 2. This principle protects the rights of the land owner to use their property to protect their livelihood. 3. The continuation of this business and its natural expansion is protected in terms of spatial justice. 4. This quarry has historical significance in this community and must be protected.
Spatial Sustainability	<ol style="list-style-type: none"> 1. The sustainability of surrounding communities will be protected with the continued provision of jobs and economic security. 2. Land Use systems must promote development that is within the fiscal, institutional, and administrative means of the Republic. 3. This mine has operated at various capacities over the past 20+ years and has become a key component of the community. 4. Promote and stimulate the effective and equitable.
Efficiency	<ol style="list-style-type: none"> 1. This quarry efficiently makes use of natural resources and infrastructure to fulfil an important consumer demand. 2. The expansion of this quarry will allow more effective and efficient distribution of building materials to the Construction Industry. 3. This quarry is located outside of the urban edge and within a rural area. 4. This quarry is located within 4km of the high mobility N6 highway.
Spatial Resilience	<ol style="list-style-type: none"> 1. The expansion of this quarry will enable the surrounding community to remain resilient and secure their livelihoods. 2. The BCM Spatial Development Framework does not prohibit a quarry in this area. 3. The BCM Local Spatial Development Framework does not prohibit a quarry in this area. 4. The expansion of the quarry footprint will result in no harm to any communities since it does not impede on the livelihood of any persons. 5. Should this quarry be removed or cease operation, there will be a significant negative impact on the local economy.
Good Administration	<ol style="list-style-type: none"> 1. The rights to this quarry are being applied for in terms of the applicable legislation and the rights to submit an application are protected by this principle.

Roads and Infrastructure

A traffic impact study was completed to assess the impacts of this proposal on the surrounding roads. Per this assessment it was found that the quarry currently makes use of 2 roads to transport its materials, namely: Road W, a provincial road which links to the N6 Highway and Road B, a municipal road which links into the R102. Both roads are unsurfaced.

Based on the recommendation of the TIS, it is proposed that the quarry make exclusive use of the W Road for its delivery trucks. It is further proposed that as the quarry expands its output to approximately 200 deliveries per day, the W road will be surfaced at the expense of the Quarry or otherwise maintain the road to a suitable condition until it is financially viable to resurface the road (a 3 year time frame has been proposed). This solution therefore proves that there is sufficient capacity for this quarry expansion and that it is feasible from a road maintenance point of view.

Based on this solution proposed above, the quarry will have no negative impact on the surrounding properties due to the usage of delivery trucks. Further to this, there can be no restrictions put in place that excludes the use of this public Provincial road for any individuals or companies. Per the SPLUMA principles the landowner cannot be discriminated against by restricting their access into and out of their property.

Noise

The noise that is generated on this property can be described as expected in terms of the associated and accepted noise levels within a rural area. In particular, the operation of heavy mining machinery will not be out of place within an agricultural area, where other similar heavy machinery is commonly used. What is of further note is that this noise generation is limited to working hours during the day and will not disturb residents that are living in the area.

In essence, the noise generated by a quarry is not out of place in a rural surrounding. It is far removed from residential neighbourhoods where noise restrictions may be put in place.

Character of the Surrounding Area

In terms of the impacts of this proposal on the existing character of the area, they will be minimal. This is primarily due to the fact that this quarry has been operating in various capacities over the course of the past 20 years. It can therefore be stated that this quarry is in fact a defining feature of this community and has been for many years. The increase in the size of this quarry will only add to an existing feature and will not disrupt the status quo.

The character of the area can be broadly described as a rural agricultural based community outside of the urban edge. In relation this, a quarry is seen as both suitable and appropriate within this rural space, since mining and agriculture are core rural economies throughout South Africa. Quarries in particular have unique locational requirements, whereby they need to remain close enough to their prospective consumer base but remain outside of the urban footprint. The rural area where Wansley is located is an ideal example of this.

Visual Aesthetic

The expansion of this mining area will result in a minor decreasing of the general visual aesthetic of the farm portion. However, this visual impact will not greatly impact any neighbouring farms due to the quarry being located at the far end of the W road and with no through-traffic occurring.

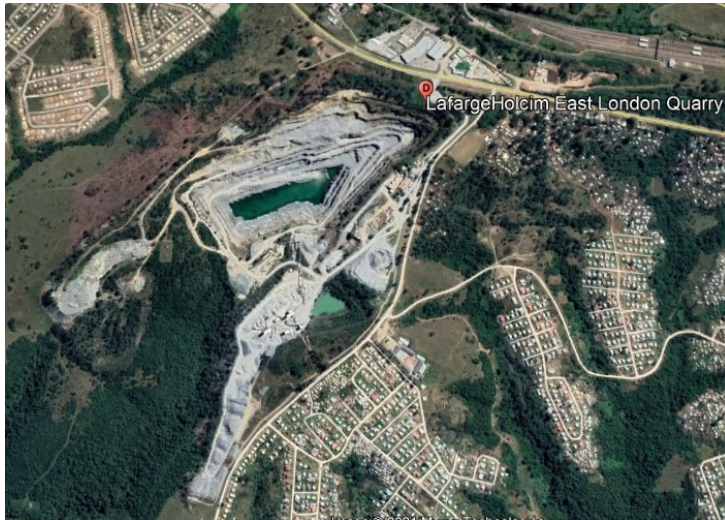
Due to the elevation of the farm, the quarry will not be highly visible to neighbouring properties and cannot be described as an eyesore. Since operation of this quarry has occurred over the course of many years, gradual growth is to be expected. From a visual perspective, little will change as the size of the quarry will merely become larger.

A final key point is the need to rehabilitate the site once the mining activity on a particular portion of the site has ceased. What this essentially means is that only the area that is currently being mined will be impacted from a visual perspective.

Precedents

Lafarge Holcim East London Quarry:

Estimated footprint: 60 hectares
Location: Reestan, Mdantsane Access Road



Similarly to Wansley Quarries, the Lafarge Holcim Quarry shown above is located off of the Mdantsane Access Road which further leads to the R102 and N2 highway. This quarry has been operational for many years while housing has encroached toward this quarry over the past few years. A similar trend may be seen at Wansley Quarries.

East London Quarry:

Estimated footprint: 20 hectares
Location: 4km outside of Mdantsane North



Email: dbpconsult1@gmail.com
Fax: 086 551 3778
No 92 Smartt Road, Nahoon, East London 5217

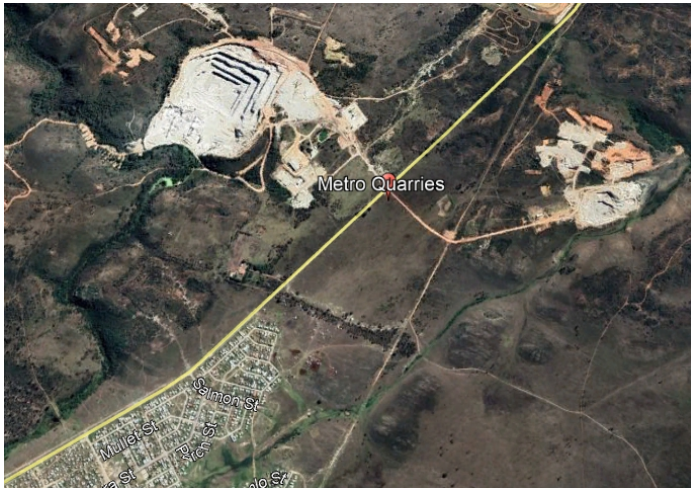
Cell: 079 887 3454
Tel: 043 735 0949
PO Box 15168, Beacon Bay, 5205

East London Quarries is operated at a similar capacity to what is proposed at Wansley Quarries. It is located only 4km outside of the Mdantsane Urban Area. This is a prime example of the location, access and space required of a quarry.

Metro Quarries

Estimated footprint: 53 Hectares

Location: Greenbushes, Port Elizabeth



Metro Quarries is another example of a quarry which makes ideal use of the location and access required of a quarry. This is a medium to large scale quarry that may be comparable to the Wansley Quarries proposal.

As has been shown in the above precedents, the size, location and access associated with quarries is fairly standard and follows a common theme. Quarries are typically located outskirts of the urban footprint, generally 4-6 km at minimum from the nearest urban areas. They typically require access to higher order mobility routes (national or regional roads). Their standard operational size ranges around 50 hectares.

From a Town Planning perspective, the location and proposed size of Wansley Quarries aligns with these precedents and is not out of place among its competitors.

Conclusion

Therefore, from a Town Planning perspective, we find that Wansley Quarries is ideally located and its proposed expansion is in line with similar precedents that have been set.

Per the SPLUMA principles the land owner has every right to make application for this expansion in order to protect their livelihood and promote further employment within the community.

In terms of its role within the community, Wansley Quarries has been a contributor within this community for many years and has every right to grow along with the rest of the community.

In conclusion, there is no associated risk to the community from a land use or spatial planning point of view.