



21 June 2023

To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: PROPOSED EXPANSION TO 130M3 LIQUID PETROLEUM GAS (LPG) STORAGE TANKS ON ERF 179 APEX X3, 18 APEX ROAD WEST, AS WELL AS THE ESTABLISHMENT OF EIGHT (8) 33M3 TANKS WITH ALCOHOL, BENZINE AND KEROSENE RESPECTIVELY ON ERVEN 265 & 266 APEX X4, CORNER LONDON AND ANTWERP STREETS, BENONI, CITY OF EKURHULENI, GAUTENG PROVINCE

The above-mentioned project refers. The project consists of two sites, namely at Erf 179 Apex X3, 18 Apex Road West, Benoni, City of Ekurhuleni and Erven 265 & 266 Apex X4, corner London and Antwerp streets, Benoni, City of Ekurhuleni (Figure 1-4). The applicant is Shield Chemicals (Pty) Ltd (Figure 1-3).



Figure 1: Location of Benoni in the Gauteng Province.



Figure 2: Location of the sites in relation to Benoni.



Figure 3: Detailed view of the location of the sites.

The first section (Fuel site) of the project entails an existing site with 50m³ storage which will be expanded to include another storage. The storage will now be in two 65m³ tanks. Phased activities for all activities listed, which commenced on or after the effective date of this notice or similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA notices where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold (Listing 1, Activity 67) requires environmental authorisation.

The second section (Chem site) of the development entails eight (8) 33m³ tanks with Alcohol, Benzine, Kerosene respectively, which will be established. The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80m³ or more but not exceeding 500m³ is a listed activity (Listing 1, Activity 14) requiring environmental authorisation.

An HIA must be done under the following circumstances:

- a. The construction of a linear development (road, wall, power line, canal etc.) exceeding 300m in length.
- b. The construction of a bridge or similar structure exceeding 50m in length
- c. **Any development or other activity that will change the character of a site and exceed 5 000m² or involve three or more existing erven or subdivisions thereof.**
- d. Re-zoning of a site exceeding 10 000 m².
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority.

The site was studied via Google Earth images (Figure 4) and photographs provided by the client (please see attached). It is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA). The following is applicable:

- The site has been entirely disturbed by recent activities.
- No natural vegetation is left on site.
- The site forms part of an industrial area with numerous industrial buildings and related activities, meaning that the chance of finding heritage resources is zero.
- All current structures on site are less than 60 years of age (see Appendices).

It needs to be indicated that the EIA screening tool for the sites indicates that the entire area, has high heritage significance (Figure 5-6). This must be based on outdated data as this area has been disturbed by recent activities. It also may refer to the wider area which is much larger than the two sites in question. Any possible archaeological sites will indeed not be impacted on.



Figure 4: Detailed view of the sites. Note it being entirely disturbed by recent human interventions

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

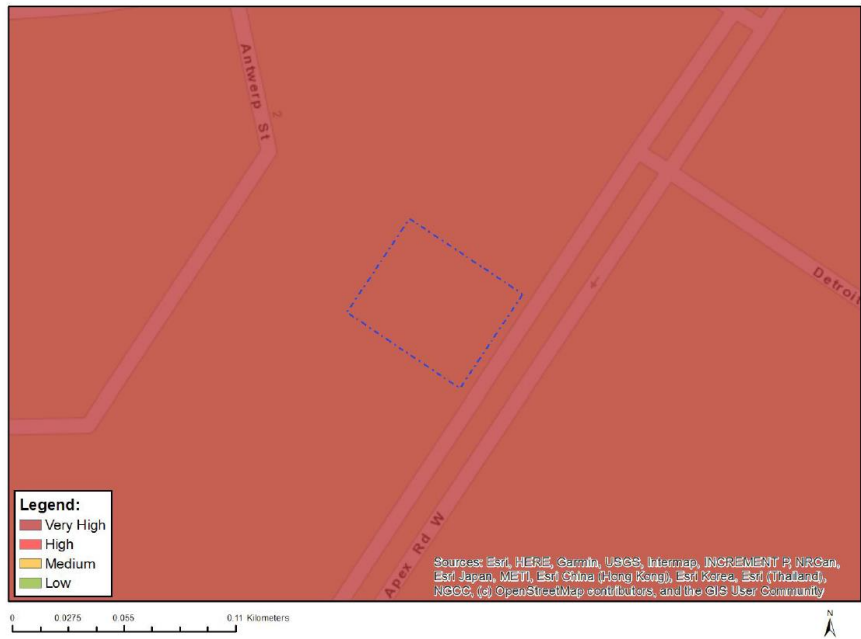


Figure 5: Environmental Screening Tool map for the fuel site indicating archaeology as a high risk.

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY



Figure 6: Environmental Screening Tool map for the chem site indicating archaeology as a high risk.

In light of these factors, the chances of finding any heritage related features are indeed extremely slim, if any. This letter serves as an exemption request to the relevant heritage authority.

The developer should however note that due to the nature of archaeological material, such sites, objects or features, as well as graves and burials may be uncovered during construction activities on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter of urgency to assess such occurrences.

Recommendation:

That the development be exempted from doing an HIA.

I trust that you will find this in order.

Yours faithfully

Prof AC van Vollenhoven: Director

Appendices - Site photographs