

**Umlando: Archaeological Surveys &
Heritage Management**

PO Box 10153, Meerensee, 3901
1 Perch Pool, Meerensee, Richards Bay, Kwazulu Natal
Cell: 0836585362 / 0723481327
Phone/fax 035-7531785
email: umlando@gmail.com



7 April 2023

**PROPOSED 80 000 TONNES PER ANNUM (TPA) TIO₂ PLANT IN THE
RICHARD'S BAY INDUSTRIAL DEVELOPMENT ZONE, KWAZULU-NATAL,
REF: SAH22/20087**

To whom it may concern

Umlando and SRK have discussed the comments from KZNARI regarding the Nyanza development.

Since the initial 2021 survey, there have been changes in the footprint. Site A5 no longer occurs within the footprint, and no longer requires an assessment.

An adequate survey was undertaken where areas with good ground visibility were used as a sample for the areas with poor visibility. The area is a general lag deposit of stone tools on a hardened calcrete layer. This has been recorded by several surveys in Richards Bay IDZ. Only four sensitive areas occur that may have human remains. It was for this reason that the survey was undertaken, despite the fact that the 2016 HIA report by Prins was accepted for the IDZ Phase 1F. The occurrence of possible human remains at older settlements always needs to be assessed.

Four areas are potentially sensitive and require site clearance. However, several Acts (mentioned in the attached letter and report) require a permit for vegetation clearance. This cannot be obtained until all relevant departments have issued statements. Thus vegetation clearance and surveying cannot continue until

**Winter Night Investments cc (2003/099644/23) trading as Umlando:
Archaeological Surveys & Heritage Management
VAT Reg No.: 4090215221**

**Umlando: Archaeological Surveys &
Heritage Management**

PO Box 10153, Meerensee, 3901
1 Perch Pool, Meerensee, Richards Bay, Kwazulu Natal
Cell: 0836585362 / 0723481327
Phone/fax 035-7531785
email: umlando@gmail.com



permits are obtained. The EMPr includes the condition that a HIA specialist will be on site during the site clearance phase of the project to ensure that there are no heritage resources that will be affected by the proposed project. We request that KZNARI gives a conditional acceptance of the HIA report. The condition is that site clearance and monitoring form part of the EMPr. A post site clearance report will be submitted.

Umlando has used this approach in the past on a few projects and it was approved by KZNARI.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Gavin Anderson'. The signature is stylized with a large, sweeping initial 'G' and 'A'.

Gavin Anderson