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29 January 2014

SAHRA
P.O. Box 4637
CAPE TOWN
8000

Attention: Andrew Salomon
By email: asalomon@sahra.org.za

Dear Sir,

12/9/11/L1303/3: SAHRA Case ID 4545: Waste Management Licence for Exol Group (Pty) Ltd – Virginia, Free State for wastewater treatment plant

I refer to your letter dated 28 January 2014 requesting a Heritage Impact Assessment (HIA) for this project.

Kindly note that it is my opinion that a HIA is not required based on the following:

The entire property is 2.1ha (page 3 of BID). This property however, is a developed site (with approved building plans from the local authority) and located within an industrial area (see aerial image below – yellow line indicates property boundary). The property also has an existing waste management licence for its current activities (Licence 12/9/11/L195/2 – see page 3 of BID). This application for a waste management licence relates to a small wastewater treatment plant to be established on the site within an already bunded area of 8 X 9.5 m or 76m² (see photo below and red boundary in aerial view). According to the National Heritage Resources Act, 1999, a HIA is only required for:

- a. The construction of a linear development (road, wall, power line canal etc.) exceeding 300m in length. Not a linear development.
- b. The construction of a bridge or similar structure exceeding 50m in length. Not a bridge or similar structure.
- 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. No changing of character of site, sub-divisions or > 5 000m²
- d. Re-zoning of a site exceeding 10 000 m². No rezoning.
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority.

This activity therefore does not trigger any of the above and it is unclear why SAHRA requested a HIA. We therefore apply for exemption from conducting a HIA. Please do not hesitate to contact me should you require further supporting information.

Regards,

A handwritten signature in black ink, appearing to read "Paulette Jacobs", written over a white background.

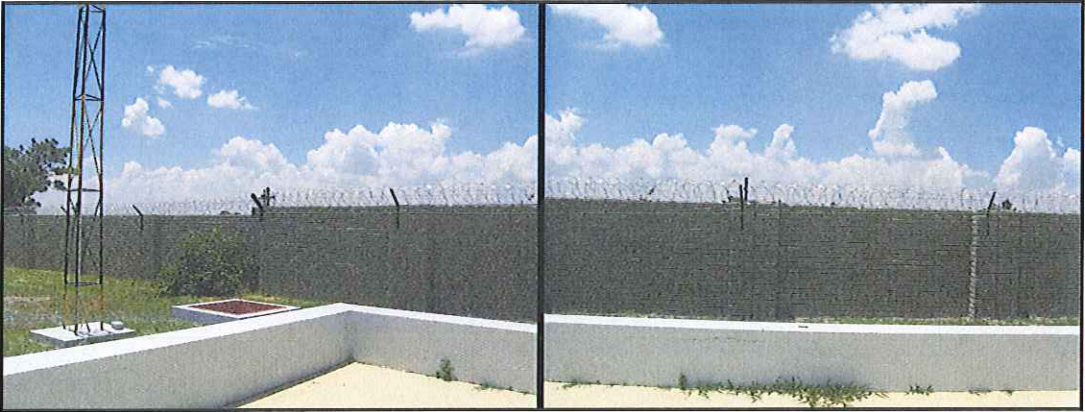
Paulette Jacobs



Aerial view indicating property boundary (yellow line) with existing structures and infrastructure, surroundings (industrial area) and location of wastewater treatment plant (red line)



**Existing structures and infrastructure:
used oil storage tanks licenced (left) buildings (right)**



Bunded area (already established) within which wastewater treatment plant will be built.