

30 November 2018

Attention: Mr. Andrew Salomon

Archaeological Heritage Impact Assessor  
South African Heritage Resources Agency  
P.O. Box 4637  
Cape Town  
8000

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**REQUEST FOR EXEMPTION FROM A HERITAGE IMPACT STUDY FOR THE DEVELOPMENT  
OF A NATURAL GAS PIPELINE IN WADEVILLE, JOHANNESBURG EAST, GAUTENG PROVINCE**

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Dear Mr. Salomon

The abovementioned project has reference. Please find attached a letter prepared by PGS Heritage both notifying your Department of the proposed development of a natural gas pipeline in Wadeville, Johannesburg East, Gauteng Province, and requesting exemption from the need to conduct a Heritage Impact Study for the proposed development. The information presented below and included in the letter prepared by PGS Heritage and attached as Appendix A provides an explanation on the reasoning behind the request for exemption from a Heritage Impact Study.

**IMPORTANT NOTE:** A similar application for exemption was submitted for a previous routing of the same proposed pipeline. This route remains a viable option, however the applicant requested a further investigation be conducted for a novel variation of that previous route (for technical reasons). This variation is the subject of this application, and while similar, the two alternatives represent two different development options and must please not be conflated, but rather be treated as separate exemption applications. Please see Appendix B for information regarding the previous application – which is not under consideration for the purposes of this application.

The pipeline route which is the subject of this application is approximately 3.091km in length, the majority of which (i.e. approximately 1.9km) occurs within the Wadeville Industrial Area as defined by the township zoning for the Ekurhuleni Metropolitan Municipality (as informed by the Ekurhuleni Metropolitan Municipality's General Plan). The remainder occurs outside of the Wadeville Industrial Zone, and within the road servitude of South Rand Road (N17), and Guthrie Road (M35). The proposed pipeline route largely follows the routing of Rossouw Road, turning south down Nagington

Road, connecting with Rendell Road, past the cemetery on Leeds Road and then connecting with Guthrie Road around the perimeter of the Elsburg/Wadeville Cemetery.

The project site is located within a developed, semi-urban, semi-industrial area. The study area has been heavily developed and the proposed pipeline will be running through an industrial sector. The site is heavily disturbed due to dense development and heavy industrialisation of the area. As such, and considering the following project characteristics and components, no further heritage impact assessment is recommended by the specialist for the construction of a natural gas pipeline in Wadeville, Johannesburg East, Gauteng Province.

- » The pipeline is proposed within an area which has been heavily developed, and previously disturbed.
- » The majority of the pipeline route is proposed within existing road servitudes.
- » The project components associated with the development will be small. The proposed pipeline will be approximately 150mm in diameter, and trenches required for the proposed pipeline would be approximately 50cm in width.
- » No historic, Iron Age or Stone Age heritage sites were noted during the site visit undertaken by PGS Heritage on the 28<sup>th</sup> and 29<sup>th</sup> November, 2018.

The table below provides a comparative summary of the legislative thresholds included in Section 38(1) of the National Heritage Resources Act (No. 25 of 1999) (NHRA) and the project components associated with the development of the pipeline.

Section 38(1) Thresholds / trigger	Does the Pipeline trigger?	Description
Construction of a road, wall, power line, pipeline, canal or other linear form of development or barrier exceeding 300m in length.	Yes	The project entails the construction of a natural gas pipeline approximately 3.091km in length, within a previously disturbed semi-urban, semi-industrial area.
Construction of a bridge or similar structure exceeding 50m in length.	No	No bridge or similar infrastructure is proposed.
Development or activity which will change the character of the site –	No	The pipeline is proposed within a semi-urban, semi-industrial area, and will be located approximately 1m to 3m underground. The development will therefore not change the character of the site.
a) Development exceeding 5 000m <sup>2</sup> .	No	The proposed pipeline will occupy an area approximately 958.21m <sup>2</sup> in extent (i.e. 3.091km x 150mm), and will therefore not exceed 5 000m <sup>2</sup> .
b) Development involving three or more erven or sub divisions.	No	Three or more erven will be affected, however the development will not change the character of the site.
c) Development involving more than 3 erven or sub divisions that have been consolidated in the past 5 years.	No	Three or more erven will be affected, however these erven have not been consolidated in the past 5 years and the development will not change the character of the site.

Section 38(1) Thresholds / trigger	Does the Pipeline trigger?	Description
Re-zoning of site exceeding 10 000m <sup>2</sup> .	No	No re-zoning exceeding 10 000m <sup>2</sup> will take place.
Any other development category, public open space, squares, parks or recreational grounds.	No	No other development category associated with the development.

Considering the proposed location of the pipeline within a semi-urban, semi-industrial area, the characteristics of the project components and the thresholds included in Section 38(1) of the NHRA it was concluded by the specialist that a Heritage Impact Assessment is not required for the development of the natural gas pipeline.

Based on the information provided we formally request exemption from the need to conduct a Heritage Impact Study for the proposed development. Please also kindly provide us with written confirmation for our records.

Please do not hesitate to contact me should you require additional information.

Kind regards

Gideon Raath  
 Environmental Consultant  
 gideon@savannahsa.com



**APPENDIX A:**

**REQUEST FOR EXEMPTION LETTER PREPARED BY PGS  
HERITAGE**

## **APPENDIX B:**

**DETAILS OF THE PREVIOUS EXEMPTION APPLICATION WHICH MUST NOT BE CONFUSED WITH THE CURRENT APPLICATION, AND SHOULD BE TREATED AS A SEPARATE APPLICATION IN ITS OWN RIGHT**



### Development of a Natural Gas Pipeline in Wadeville

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**CaseHeader** **LocationInfo** **Admin**

**Status:** Returned to Applicant

**HeritageAuthority(s):** SAHRA

**Case Type:** Section 38 (8) - Statutory Comment Required

**Development Type:** Infrastructure

**ProposalDescription:**

Development of a Natural Gas Pipeline in Wadeville, Johannesburg East, Gauteng Province

**Expanded\_Motivation:**

Request for exemption from a heritage impact study

**ApplicationDate:** Monday, October 29, 2018 - 11:29

**CaseID:** 13115

**OtherReferences:**

**ReferenceList:**

#### AdditionalDocuments

- [Wadeville Gas Pipeline - Savannah Environmental Cover Letter 26.10.18.pdf](#)
- [Wadeville Gas Pipeline - PSG Heritage Request for Exemption from HIA Study 17.10.18.pdf](#)

SAHRA Case number: 13115

Case Link: <https://www.sahra.org.za/sahris/cases/development-natural-gas-pipeline-wadeville>

Case Title: Development of a natural gas pipeline in Wadeville.

Uploaded to SAHRIS: 29 October 2018.