



*eThembeni
Cultural
Heritage*

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21 April 2018

Attention Bernadet Pawandiwa

Dear Ms Pawandiwa

Application for HIA Exemption

RBCT Repeater Mast

Port of Richards Bay, Umhlathuze LM, King Cetshwayo DM, KwaZulu-Natal

Project Description ¹

Richards Bay Coal Terminal (Pty) Ltd (RBCT) intends to erect a repeater mast. The mast will be located just off the Harbour Arterial Route, 0.5 kilometres from the RBCT premises within the Port of Richards Bay. The repeater will be used to amplify signal for the RBCT rail locomotives. The repeater system is also a collision-prevention safety measure, which will allow greater efficiency and rail traffic control within RBCT.

See Google Image below (as also loaded to SAHRIS Case File).

WSP Environment & Energy, Africa are the appointed Environmental Assessment Practitioners to oversee acquiring Environmental Authorisation from the competent authority (DETEA: KZN) in terms of the amended EIA Regulations, 2014, for which a Scoping and Environmental Impact Assessment process is applicable.

¹ Information provided by WSP Environment & Energy, Africa.



Figure 1 Richards Bay Coal Terminal and location of proposed Repeater Mast

Observations

eThembeni have intimate knowledge of the RBCT tower site, having conducted an HIA for auxiliary railway-lines to the coal terminal in 2004 and having compiled a Base Line Heritage Study for the proposed Richards Bay Port Expansion in 2013.² Pertinent here too is the palaeontological monitoring conducted for the construction of the Berth 306 within the Port³ and the HIA conducted for the proposed expansions to the Port in 2009.⁴ All attest to the low sensitivity of heritage resources within the Richards Bay Harbour precinct.

² See SAHRIS: Baseline Heritage Study: Proposed Richards Bay Port Expansion. Prepared for AECOM. eThembeni. 2013

³ See SAHRIS: Construction of Berth 306 at the Port of Richards Bay: Removal of Ammonites from the Upper Maastrichtian (Cretaceous) Layer. A. van Jaarsveld. 2006.

⁴ See SAHRIS: Heritage Survey of the Proposed Expansion to the Transnet National Ports Authority, Richards Bay. Umlando, 2009.

A detailed history of Richards Bay and the Mhlatuze Estuary and its environs is provided by A.d.V Minnaar (1985) ⁵ and is quoted in all the reports cited above. For the readers interest it is appended below.

Suffice to say that during the 20th Century, Richards Bay was primarily a recreational fishing destination until establishment of the harbour and adjacent township began in the early 1970's. Inception of dredging of the Mhlatuze Estuary for the new harbour began in 1972. In 1974 a berm wall was constructed from dredge spoils to effectively separate the harbour development area from the proclaimed Richards Bay Nature Reserve, thus conserving the sensitive estuarine habitat.

It is upon this berm that the railway access route to the coal terminal is constructed, including a service road for heavy vehicles (Harbour Arterial); and upon which the proposed Repeater Tower is to be erected. All dock-side infrastructure is located on reclaimed swamplands built up by harbour dredging spoils and imported fill materials.

The entire area of the Richards Bay Harbour, prior to establishment, comprised extensive *Phragmitis* swamplands and mangrove and swamp forests associated with the Mhlatuze estuary. This is an environment that would have been eschewed for human settlement. Consequently no archaeological residues are anticipated. No buildings, equipment or structures of historical significance occur within the study area.

Palaeontology

The underlying lithology of the Richards Bay Harbour comprises Tertiary and Cretaceous successions of the KwaZulu-Natal Maputland Group (Late Caenozoic Era). ^{6,7,8} These are paleontologically significant strata that have been extensively described by Klinger (2005)⁹ and latterly by Kennedy and Klinger (2011)¹⁰. However these strata lie some 14 m below m.s.l and have only been exposed during deep dredging and excavation (see Fig.2).

The proposed Repeater Mast is secured at current ground level and will have no impact on the fossil bearing strata below.

⁵ AdV Minnaar. History of Richards Bay. HSRC Research Note No.17. 1985. Pretoria.

⁶ Groenewald. G. 2012. Unpublished Palaeotechnical Report for Amafa KwaZulu-Natali. Pietermaritzburg.

⁷ Palaeontological Impact Assessment of the proposed development of the Richards Bay Combined Cycle Power Plant (CCPP). Banzai Environmental. 2017.

⁸ Ovechkina, M. N 2012. Palaeontological Impact Assessment desktop study for the Richards Bay Port Expansion Programme. Unpublished report submitted to eThembeni Cultural Heritage.

⁹ The first record of *Ostrea unguolata* (von Schlotheim, 1813) (Bivalvia: Ostreoidea) from the Upper Maastrichian of KwaZulu, South Africa. African Natural History 4. 2005

¹⁰ Cretaceous faunas from Zululand and Natal, South Africa. The ammonite subgenus *Hauericeras* (*Gardeniceras*) Matsumoto & Obata. 1955. Palaeont.afr. 2011.46:43-58.



Figure 2 Excavations at Berth 306, Richards Bay Harbour. Exposure of Cretaceous horizons at 14m below m.s.l.¹¹

¹¹ Construction of Berth 306 at the Port of Richards Bay: Removal of Ammonites from the Upper Maastrichtian (Cretaceous) Layer. A. van Jaarsveld. 2006.

Recommendations

In the absence of any foreseeable impact on any classes of heritage resources, we request that Amafa allow the erection of the Repeater Mast to proceed with exemption from any further heritage resource mitigation.

In this regard, please can you notify us timeously via the loaded SAHRIS case file as to the decision of Amafa.

Yours sincerely



Len van Schalkwyk
Principle Investigator.