



10 February 2023

To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: R-BAY PROPERTIES PROPOSED CHEMICAL WAREHOUSE, KWAZULU-NATAL PROVINCE

The above-mentioned project refers. Archaetnos CC was appointed by WSP Group Africa (Pty) Ltd to write a motivation for an HIA exemption request. The client is R-Bay Properties (Pty) Ltd. The site is situated on Erf 2306 and 2307, Shortts Retreat, Pietermaritzburg, KwaZulu Natal Province (Figure 1-3).

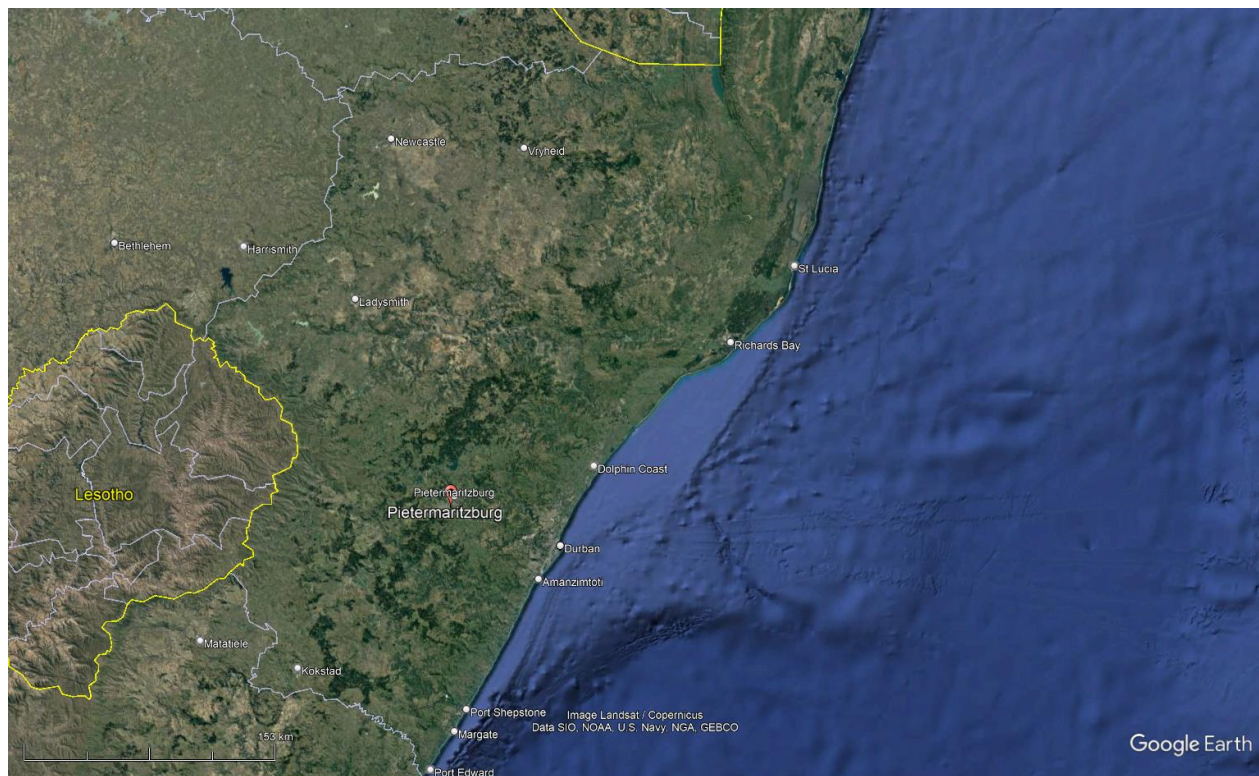


Figure 1: Locality of Pietermaritzburg in the KwaZulu-Natal Province.



Figure 2: Location of the site in relation to Pietermaritzburg.



Figure 3: Location of the site in relation to surrounding environment.

Project information:

R-Bay Properties (Pty) Ltd (R-Bay), a subsidiary of the Richbay Group of Companies (Richbay) proposes to construct a chemical warehouse for the storage of dangerous goods with a capacity of approximately 2 000 m³. The warehouse will be designed as a purpose built chemical warehousing structure. The project will entail the clearance of (potentially indigenous) vegetation on a site of 9 955 m², in Shortts Retreat, Pietermaritzburg.

The warehousing will be used as an importation hub where chemicals (already packed and palletized) will be offload from shipping containers, and stored, prior to dispatch to Richbay facilities throughout Southern Africa. In addition, processed chemicals (already packed and palletized) will be stored prior to dispatch for international distribution. No processing or decanting will take place in the warehouse/s.

The chemicals that will be stored inside the warehouse/s are provided below.

MIXTURE NAME	CONTAINER TYPE	CONTAINER VOLUME (M ³)	QUANTITY CONTAINERS (MAXIMUM)	TOTAL MAXIMUM CAPACITY (M ³)
Hydrochloric Acid	HDPE	0.25	6000	1500
Acetic Acid	HDPE	0.25	200	50
Sodium Hypochlorite	HDPE	0.25	200	50
Sulphuric Acid	HDPE	0.25	200	50
Caustic Soda (Solid)	PP	0.025	8000	200
Caustic Soda Liquid	HDPE	0.25	200	50
Phosphoric Acid	HDPE	0.25	80	20
Nitric Acid	HDPE	0.25	100	25
Sodium Metabisulphite (Solid)	PP	0.025	100	2.5
Formaldehyde	HDPE	0.25	20	5
Ammonium 25%	HDPE	0.25	80	20
Sodium Chlorite +25-31%	HDPE	0.25	40	10

In addition to the warehouse there will be ancillary services, including:

- Loading/off-loading bays;
- Security controlled entrance and exit;
- Parking bays;
- Offices.

HIA Exemption motivation:

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 proposed sites were studied via Google Earth (Figure 4) and photographs provided by the client. It is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA), although the proposed locations is larger than 5 000m². The following is applicable:

- The study of Google Earth indicates that the site has been entirely disturbed by former agricultural activities (Figure 5).
- The site lies within a disturbed industrial setting (Figure 6-7).
- There are no buildings on site.
- There is no natural vegetation on site and the vegetation cover consists of pioneer species such as grasses and sickle bush (Figure 8-9).
- It is believed to be low risk areas for the location of heritage sites.

In light of these factors, the chances of finding any heritage related features are believed to be 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.



Figure 4: Project design.



Figure 5: Note the disturbance on site.



Figure 6: View of site showing disturbance and industrial buildings adjacent to the property.



Figure 7: Site vegetationsn and inducstrial building on surrounding land.



Figure 8: Site vegetation.



Figure 9: Pioneer vegetation in the study area.

Recommendation:

That the development be exempted from doing an HIA.

I trust that you will find this in order.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A.C. van Vollenhoven', written over a light-colored rectangular background.

Prof AC van Vollenhoven: Director