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To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: SANRAL ROUTE 72 (IMPROVEMENT WITHIN ALEXANDRIA ON NATIONAL ROUTE R72 SECTION 2 KM 48.70 TO KM 2.6.), CLOSE TO GQEBERHA, EASTERN CAPE PROVINCE

The above-mentioned project refers. Archaetnos CC was requested by DELTABEC, on behalf of SANRAL, to do an exemption request for the doing of an HIA for the project.

The upgrade of the route is planned within the existing road reserve and situation on portion 0 and 39 of the farm Brakfontein 241. The project extends across two sections of the National Route R72; from Section 1 km 48.70 to Section 2. These sections of National Route R72 are in the Ndlambe Local Municipality, in the Sarah Baartman District Municipality in the Eastern Cape Province. The route begins in Alexandria, traversing both urban and rural areas (Figure 1-3).



Figure 1: Location of Gqeberha and Alexandria in the Eastern Cape Province

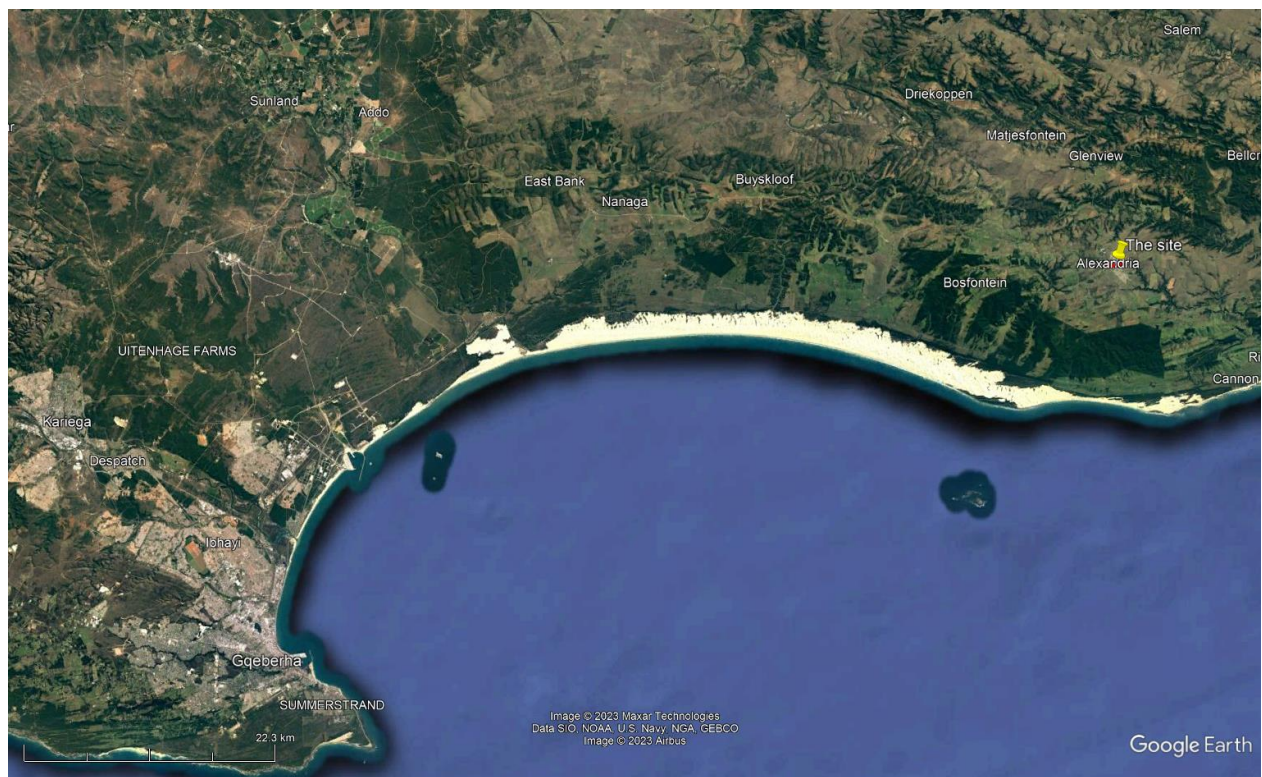


Figure 2: Location of the site in relation to Gqeberha and Alexandria



Figure 3: Location of the study area.

Project proposal:

The current status of the project is at the initial stage for authorisation, awaiting specialist studies for completion of DBAR. The proposed project is a linear activity including upgrade of Road R72 from R72-1 km 48.70 to R72-2 km 1.20. The aim of this improvement project is to:

- Improve road and pedestrian safety;
- Provide additional capacity; and
- Improve the Kwanonqubela intersection.

This will be achieved by providing surfaced shoulders, pedestrian facilities, improving street lighting and improving the geometry of the Kwanonqubela intersection.

The R72 is a two-lane single carriageway road that connects the N2 east of Gqeberha, formerly Port Elizabeth, (at Nanaga) to East London. The route provides an alternative to the N2 for travelling between the two cities and provides access to several urban areas such as Alexandria, Kenton-on-Sea and Port Alfred.

The R72 Section 1 (R72-1) and R72 Section 2 (R72-2) within the project area comprise two lanes that vary in width from 3.5 m to 5.3 m. The R72-1 from km 48.70 onward has sidewalks, surfaced shoulders and parking lanes adjacent to the road. There are surfaced shoulders and sidewalks bordering the road up to R72-2 km 0.30, whereafter there is a combination of gravel and surfaced shoulders approximately 2.5 m wide. There are two major culvert structures within the project limits at km 0.36 and km 0.73 that accommodate tributaries to the Boknes River.

The total extent of this proposed project limits is 1.2 km and will be crossing Boknes River. For this an HIA is needed, but since the area is entirely disturbed by past works, it is believed that the project qualifies to be exempted from doing an HIA. Therefore, this exemption request was prepared.

Site study:

The site was studied via Google Earth (Figure 4-7) and photographs (Figure 8-) provided by the client. Based on these it is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA).

This is motivated as follows:

- The proposed development is within an area already entirely disturbed (Figure 8-19)
- The vegetation may be natural in some places but it had been landscaped as part of the road safety measures
- Many sections show no natural vegetation but merely cultivated and planted trees
- Sidewalks were laid in concrete right next to the road
- Businesses and other buildings are located reasonably close to the road
- Culverts, fences, road signs and telephone poles are found almost along the entire route
- None of the buildings and structures along the route has any heritage significance



Figure 4: Google Earth image of first section of the route (eastern side)



Figure 5: Google Earth image of second section of the route (central-eastern side)



Figure 6: Google Earth image of third section of the route (central-western side)



Figure 7: Google Earth image of fourth section of the route (western side)



Figure 8: Typical view of road to be upgraded. Note the landscaped features consisting of cultivated grass and culverts.



Figure 9: Note sidewalks and grass indicating a landscaped environment along the route



Figure 10: View at Kwanonqubela intersection between A Street and the R72. Again note landscaped grass and planted trees.



Figure 11: Panorama of the Kwanonqubela intersection viewed from A Street



Figure 12: Another view along the road indicating the disturbance around the road



Figure 13: This photograph also indicates disturbance by recent human interventions around the road



Figure14: This photograph also shows the landscaped nature of the surrounding area



Figure 15: Looking east from km 0.56, toward the Kwanonqubela intersection



Figure 16: View at km 0.80 also indicating disturbance



Figure 17: A similar view at km 0.72



Figure 18: Elevation along the route indicating disturbance



Figure 19: Corroded metal in cells

Due to the mentioned factors, the chances therefore of finding any heritage related features are indeed extremely slim. It is therefore believed that an additional Heritage Impact Assessment (HIA) is not needed for this project. 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.

Recommendation:

That the development be exempted from doing an HIA.

I trust that you will find this in order.

Yours faithfully

Prof AC van Vollenhoven: Director