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20 May 2016

Bernadet Pawandiwa  
Amafa /Heritage KwaZulu -Natali  
P.O. Box 2685  
Pietermaritzburg  
3201

Attention: Ms. Bernadette Pandiwa

Dear Bernadette

**RE: Proposed Hillside Desalination Plant to be established at the Hillside Aluminium smelter site, Richards Bay, KwaZulu-Natal.**

### **Background**

The project assessed is the proposed Hillside desalination plant and associated infrastructure to be established at Hillside in order to provide Hillside with a temporary, emergency alternative supply of process water.

### **The study area**

Hillside is located on Portion 43 of Erf 5333, Alton in Richards Bay within the uMhlathuze Local Municipality and Uthungulu District Municipality (Figure 1). The Hillside site is accessed via the West Central Arterial to the south of the site. The proposed desalination plant would be located at Hillside (GPS coordinates of the approximate centre of the desalination plant are: 32° 1'43.25" E and 28°46'13.39" S) as seawater would be abstracted from the existing and approved abstraction point between berths 609 and 701 at the Richards Bay Harbour (GPS coordinates of the abstraction point are: 32° 02' 15" E and 28° 47' 05" S). Wastewater from the desalination plant would be pumped to the Mhlathuze Water Sea Outfall Pipeline via the existing historical Lake Mzingazi raw water pipeline located between the two smelters.

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located.

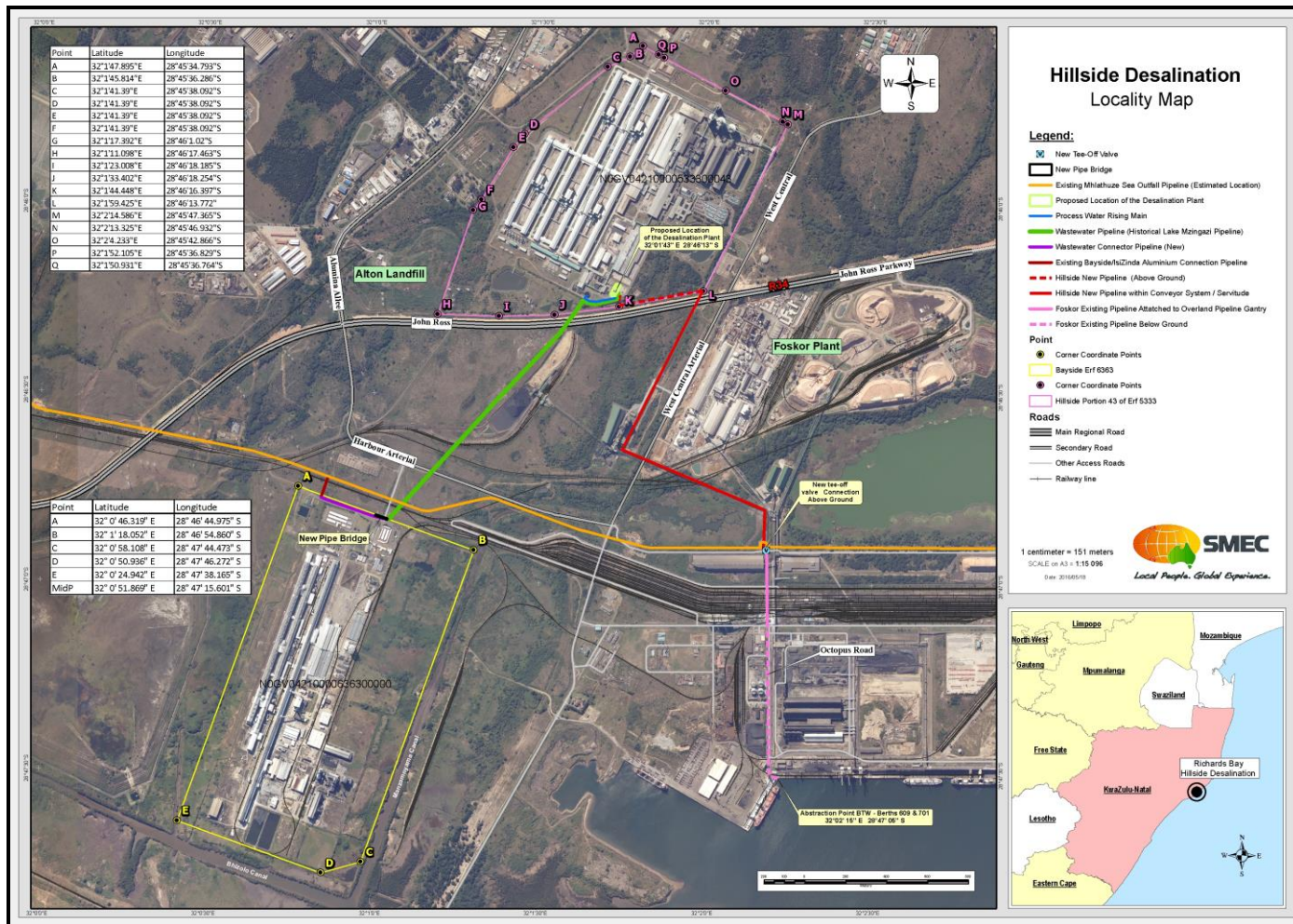


Figure 1. Locality Map as provided by SE Solutions

Several previous heritage studies were conducted in the general study area (SAHRIS) including:

- » Anderson, G. & Anderson, L. 2008. Archaeological Survey Of The Inhlansi Project For Nozelela Minerals Sands (Pty) Ltd. Numerous sites were recorded including burial, archaeological and oral history sites.
- » Anderson, G. & Anderson, L. 2008. Archaeological Survey Of The Proposed Alton Sewer Pipe Upgrade - No sites were recorded during the course of the survey along the pipeline deviation.
- » Anderson, G. & Anderson, L. 2009. Heritage Survey Of The Proposed Expansion To The Transnet National Ports Authority, Richards Bay - A total of nine sites were recorded during the course of the survey. These sites date from the Cretaceous to the Late Iron Age.
- » Anderson, G. & Anderson, L. 2010. Heritage Survey Of The Proposed Richards Bay Central Industrial Area For Coastal & Environmental Services. The survey did not locate any heritage sites.
- » Van Schalkwyk, L. & Wahl, E. 2014. Application for Exemption from a Phase 1 Heritage Impact Assessment of Proposed Decommissioning of the Legacy Landfills at The Bayside Aluminium Smelter, Richards Bay, KwaZulu-Natal, South Africa

The proposed development site and surrounding area have been extensively disturbed by activities associated with the surrounding industrial developments. The pipelines are to be constructed in existing servitudes and will be constructed above ground limiting impact on the surrounding environment.

## **Conclusion**

SE Solutions has been appointed as the independent environmental consultant, to undertake the required environmental management process for the project to identify and assess potential environmental impacts, and to propose appropriate mitigation and management measures as part of an Environmental Management Programme (EMP). They subsequently requested heritage input to identify potential impacts.

From a heritage perspective the disturbed character of the site does not warrant a full Phase 1 study as no *in-situ* archaeological material, cultural heritage sites, historic structures or burial grounds are likely to be present on the affected landscape, due to the disturbed nature of the site. This is in line with similar studies in the immediate vicinity that identified no heritage sites (Anderson & Anderson 2008 & 2010) or recommended exemption from further studies (Van Schalkwyk & Wahl 2014). Galimberti (2015) also stated that the heritage resources in the area are sufficiently recorded and that the surveys undertaken in the area adequately captured the heritage resources.

The above ground construction of the pipelines is also considered to have a negligible impact on the heritage resources that may occur in the area.

As such, we support the recommendation that the project be exempted from further heritage assessment studies and we request that AMAFA grant an exemption from an HIA for this project, allowing the project to proceed with no further heritage resource mitigation

In the unlikely event that any sites might occur within the proposed site the following recommendations are to be included in the EMP and are the responsibility of the ECO of the project to implement these:

- If during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be contacted for an assessment of the find.

If the above mentioned recommendations are adhered by we support the application for exemption from a Phase 1 Archaeological Impact Assessment.

Any further queries can be forwarded to Jaco van der Walt on Cell: +27 82 373 8491 or to [jaco.heritage@gmail.com](mailto:jaco.heritage@gmail.com)

A handwritten signature in black ink, appearing to read 'Jaco van der Walt'.

Jaco van der Walt  
Archaeologist  
Heritage Contracts and Archaeological Consulting CC (HCAC)

## References

Archaeological Database Wits University 2009

Anderson, G. & Anderson, L. 2008. Archaeological Survey Of The Inhlansi Project For Nozelela Minerals Sands (Pty) Ltd. Numerous sites were recorded including burial, archaeological and oral history sites.

Anderson, G. & Anderson, L. 2008. Archaeological Survey Of The Proposed Alton Sewer Pipe Upgrade - No sites were recorded during the course of the survey along the pipeline deviation

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Anderson, G. & Anderson, L. 2010. Heritage Survey Of The Proposed Richards Bay Central Industrial Area For Coastal & Environmental Services - The survey did not locate any heritage sites.

Galimberti, M. 2015. Heritage Screener for the Proposed 60MW biomass plant within the Richards Bay IDZ, Umhlautze Local Municipality, KwaZulu-Natal.

National Heritage Resources Act NHRA of 1999 (Act 25 of 1999)

SAHRA Report Mapping Project Version 1.0, 2009

Van Schalkwyk, L. & Wahl, E. 2014. Application for Exemption from a Phase 1 Heritage Impact Assessment of Proposed Decommissioning of the Legacy Landfills at The Bayside Aluminium Smelter, Richards Bay, KwaZulu-Natal, South Africa.