

## Mareike Straeuli

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**From:** Theo Wicks <twicks@slrconsulting.com>  
**Sent:** 23 August 2018 07:00 PM  
**To:** Mareike Straeuli  
**Cc:** 'Settlers Park Principal'; 'Ashleigh Mckenzie'  
**Subject:** RE: Proposed Capacity improvements to national route 3 (N#) from Hammarsdale to Pietermaritzburg, KZN

Thanks Mareike,

Thank you for the response below.

As stressed below, Settlers Park Pre-Primary is ultimately concerned with how the construction phase of the project will affect them as a business. As a little school in a highly competitive schooling/business environment, the margin for catastrophic failure is tiny which is why we are particularly concerned with the construction phase. A minor decrease in school admission (<5%) will ultimately cost employees their jobs and, if compounded year-on-year during construction, it could lead to the school no longer being viable.

### Air Quality

While the ambient air quality is to an extent compromised by existing emissions, construction of the interchange will generate additional emissions and dust through the operation of construction/ earth moving machinery, additional vehicles and dust as a result of construction and demolition. I'm interested in how your Environmental Management Programme (EMPr) will address the management and mitigation of this risk. If you are not including an air quality assessment, does Acer have the capacity to inform this? Has the school been contacted to confirm whether they have/ do they admit children with a predisposition to respiratory tract complications? The emphasis here is that:

1. Will there be a decrease in the ambient air quality as a result of construction; and
2. (if yes to #2) will this affect the school from a marketability perspective and financially?

Without knowing what the existing air quality and what the significance of these impacts are, how is Acer developing an EMPr to manage these risks?

### Noise

As with air quality, can you please confirm whether your SIA and Noise assessment give particular consideration to the occupational health and well-being of the children at Settlers Park Pre-Primary, particularly those with barriers to learning (ADD, ADHD). And furthermore, if risks are identified, are these equated to financial implication for the school?

During an internal meeting last week, one of the mums highlighted that whilst their child with diagnosed ADD was able to function appropriately at the school with the current consistent ambient noise level; she was specifically concerned with how intermittent/increased noise emanating from the construction site might affect her child. She went so far to say that she would consider moving her child and, had she been presented with the proposed scenario when she was in the market for a school, she would have looked elsewhere. These are live examples of how noise presents a financial/ business risk to Settlers Park, so reiterating the above questions:

1. Will there be a increase in the ambient noise levels as a result of construction; and
2. (if yes to #2) will this affect the school from a marketability perspective and financially?

Ive included the following tables for your ease of reference which are an excerpt from the SANS Code 1013 of 2018 and actual monitored noise emissions from earth moving equipment typically used during construction:

Equivalent Continuous rating level LReq.T for ambient noise dBA						
	Outdoors			Indoors, with open windows		
Type of district	Day-night	Daytime	Night-time	Day-night	Daytime	Night-time

c) Urban districts.	55	55	45	45	45	35
d) Urban districts with some work-shops, with business premises and with main roads.	60	60	50	50	50	40

Your noise expert will have to define the appropriate district but realistically I expect it to be “Item d”).

Further reference, available noise levels emitted from certain construction machinery is detailed in the following table

Machine	LAeq
1. Bomag	72
2. FEL	78.5
3. Excavator	77.5
4. Dozer D&R	81.9
5. Tipper trucks	74.4
6. Vehicle alarms	71.5

Basically, at source, these machines do not comply with SANS for operation in an urban area. The obligation SANRAL has is to manage and mitigate this noise at its boundary. I’m obviously interested in:

- Whether construction will comply, and (if not);
- What initiatives are to be implemented to reduce noise levels (including what the expected level of success these initiatives are expected to achieve);
- And what monitoring is to occur (type, interval, reporting, and ultimately what consequences there are of non-compliance).

#### Traffic

Regarding traffic, please can you confirm:

- Has the influx and departure of traffic to and from the school been modelled for both the construction and operational phase (access and being able to depart from a school efficiently especially in the mornings influences a schools appeal). Typically these traffic assessments (especially if done by the consulting engineers is done to inform the engineering design and not the application for environmental authorisation.
- Are you having the TIA peer reviewed for the purposes of the EIA.

#### Closing

Please can you confirm your approach to the above. Failure to adequately assess these impacts will compromise the legitimacy of the process and the associated timeframes as these would not be unforeseen circumstances.

Settlers Park Pre-Primary is not opposed to the proposed upgrade however there is very real concern for the schools livelihood. The school has this year established itself as a one of the few pre-primary’s to offer a 18-24 month class with the purpose of creating continuity for the subsequent grades. This endeavour has come at great effort (obtaining necessary approvals from the Department of Education) and cost (upgrading the small garden, the outdoor container, equipment purchased, painted murals, added a roof, improved security and employed extra staff members). The class and their facilities will be located less than 45 m from the construction site. These pupils would be the most at risk and their parents potentially the most critical of schooling their toddlers alongside a construction site.

We trust that the above serves as a reference to your application and that the concerns will be adequately considered. Without the above being information being available, Acer is not in a position to adequately advise on the impacts associated with the project, which compromises the schools ability to make an informed comment.

Based on these comments, please can you confirm when the basic assessment report will be available? we are now heading toward late August rather than mid-August as discussed in the meeting with SANRAL

Kind Regards

Theo

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**From:** Mareike Straeuli [mailto:mareike.straeuli@acerafrica.co.za]  
**Sent:** 14 August 2018 07:49 AM  
**To:** Theo Wicks  
**Cc:** 'Settlers Park Principal'; 'Ashleigh Mckenzie'  
**Subject:** RE: Proposed Capacity improvements to national route 3 (N#) from Hammarsdale to Pietermaritzburg, KZN

Hi Theo

The environmental specialist studies are the following:

- Heritage
- Vegetation
- Noise
- Riparian
- SIA

Traffic and geotechnical studies are done by the engineers.

Kind Regards, Mareike

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**From:** Theo Wicks [mailto:twicks@slrconsulting.com]  
**Sent:** 13 August 2018 08:49 AM  
**To:** Mareike Straeuli <mareike.straeuli@acerafrica.co.za>  
**Cc:** Settlers Park Principal <settpincipal@telkomsa.net>  
**Subject:** RE: Proposed Capacity improvements to national route 3 (N#) from Hammarsdale to Pietermaritzburg, KZN

Hi Mareike,

Please can you provide me with a list of specialist studies which have been commissioned as input into the Basic Assessment Report for the New England to Twickenham Road section?

As mentioned during the meeting on 30 July 2018, my concerns largely pertain to the construction phase of the interchange near Settlers Park Pre-Primary and the related noise, traffic and cumulative economic impacts on the school. Assuming that these specialists have been commissioned, can you please confirm that their Terms of Reference.

Thanks and regards

Theo



Theo Wicks

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**From:** Mareike Straeuli [<mailto:mareike.straeuli@acerafrica.co.za>]

**Sent:** 06 June 2018 09:05 AM

**To:** Theo Wicks

**Subject:** Proposed Capacity improvements to national route 3 (N#) from Hammarsdale to Pietermaritzburg, KZN

Good Morning Theo

We got your contact email from Mrs Ellen Borain from the Settlers' Park Pre-primary.

Please see attached the Project Announcement letter, the Background Information Document and the Comment Sheet.

Please can you let me know if you would like to be part of the public participation process? Also please note that the public open days have taken place, if you would like to see what was shown at the open days, please see the posters on our website – [www.acerafrica.co.za](http://www.acerafrica.co.za) – under the current project tab.

Kind Regards,

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Environmental Consultant

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