

IN THE KWAZULU-NATAL HIGH COURT, DURBAN

REPUBLIC OF SOUTH AFRICA

CASE NO. 10629/2012

In the matter between:

MTUNZINI CONSERVANCY

Applicant

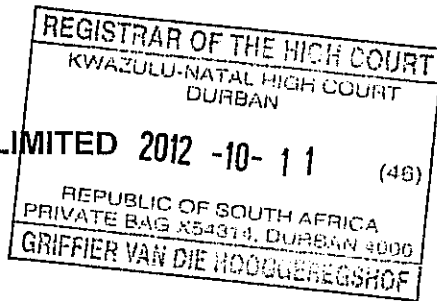
and

TRONOX KZN SANDS (PTY) LIMITED 2012 -10- 1 1 (48)

First Respondent

UMLALAZI MUNICIPALITY

Second Respondent



CERTIFICATE OF URGENCY

I, the undersigned, **RICHARD JOHN SALMON SC**, hereby certify that I have read the application papers in this matter and that I am of the view that the matter is of sufficient urgency to warrant it being placed on the Motion Court roll on the 29th day of October 2012.

DATED AT DURBAN THIS 11th DAY OF OCTOBER 2012

Richard John Salmon

RICHARD JOHN SALMON SC

IN THE KWAZULU-NATAL HIGH COURT, DURBAN
REPUBLIC OF SOUTH AFRICA

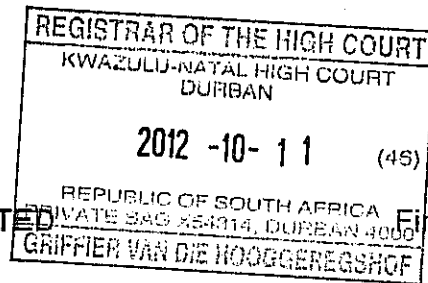
CASE NO. 10629/2012

In the matter between:

MTUNZINI CONSERVANCY

Applicant

and



TRONOX KZN SANDS PTY) LIMITED

First Respondent

UMLALAZI MUNICIPALITY

Second Respondent

NOTICE OF MOTION

KINDLY TAKE NOTICE that application will be made on behalf of the abovenamed applicant on the 29th day of OCTOBER 2012, at 09h30 or so soon thereafter as the matter may be heard for an Order in the following terms:

1.

THAT the applicant's non-compliance with the Uniform Rules of this Court is hereby condoned.

2.

THAT the first respondent is forthwith interdicted and restrained from commencing or continuing any development, as defined in section 1 read with section 38(3) of the KwaZulu-Natal Planning and Development Act, Act 6 of 2008 ("the Act), including but not limited to the carrying out of construction, mining or any other operations on any portion of any of the properties listed in Annexure "A" hereto.

3.

THAT the aforesaid interdict shall endure until the first respondent has applied for and been granted approval by the second respondent for its proposed development of the said properties in terms of section 38(1) of the Act.

4.

THAT the first respondent is ordered to pay the applicant's costs of the application on the attorney and client scale.

5.

In the event that the second respondent should oppose the relief sought herein, the first and second respondents are directed to pay the applicant's costs jointly and severally.

6.

Further and/or alternative relief.

TAKE NOTICE FURTHER that the affidavits of **BARBARA LUISE CHEDZEY**, **STANLEY WHITFIELD** and **ROBERT MURRAY CHEVES** filed evenly herewith will be used in support of the application.

TAKE NOTICE FURTHER that the applicant has appointed the address of its attorneys, set out hereunder, as the address at which it will accept notice and service of all process in these proceedings.

TAKE NOTICE FURTHER that if you intend opposing this application you are required:

- (a) to notify the Applicant's attorney in writing on or before the 16th day of October 2012; and

- (b) to file your answering affidavits, if any on or before the 22nd day of October 2012; and
- (c) further that you are required to appoint in such notification an address referred to in Rule 6(5)(b) at which you will accept notice and service of all documents in these proceedings.

If no such notice of intention to oppose be given, the application will be made on the 29th day of OCTOBER 2012.

KINDLY PLACE THE MATTER ON THE ROLL FOR HEARING ACCORDINGLY.

DATED AT WESTVILLE THIS 11TH DAY OF OCTOBER 2012.



APPLICANT'S ATTORNEYS

NORMAN BRAUTESETH & ASSOCIATES
4 Caefron Avenue
WESTVILLE

(Ref: Mr. N. Brauteseth / NM0074)

Tel. 031 – 2669300
Fax 031 – 2664277
Email admin@nbalaw.co.za

Postal address:
P.O. Box 1345
Westville, 3630

TO: THE REGISTRAR OF THE HIGH COURT
DURBAN

AND TO: TRONOX KZN SANDS (PTY) LTD
c/o Shepstone & Wylie
24 Richefond Circle,
Ridgeside Office Park
Umhlanga Rocks
(Ref. Mr. Ian Sampson)

AND TO: UMLALAZI MUNICIPALITY
Hutchinson Street
Eshowe

"A"
6

List of Properties

FARM NAMES	AREA (ha)	OWNER
Rem of Sub 1 of Lot 80B - Enyezane 10617	155.13	Mondi Limited
Rem of Por 1 of Lot 81 - Umlalazi 10072	114.33	Mondi Limited
Por 2 (of 1) of Lot 81 - Umlalazi 10072	132.25	Mondi Limited
Rem of Lot 87 - Emoyeni 10344	317.02	Mondi Limited
Rem of Lot 88 - Emoyeni 9105	461.25	Mondi Limited
Rem of Lot 89 - Umlalazi 9705	231.86	Mondi Limited
Rem of Por 1 of Lot 89 - Umlalazi 9705	237.07	Mondi Limited
Sub 4 of Lot 98 - Umlalazi 9667	127.18	Mondi Limited
Rem of Lot 98 - Umlalazi 9667	129.09	Mondi Limited
Sub 1 of Lot 99 - Umlalazi 9707	209.88	Mondi Limited
Por 5 of Lot 99 - Umlalazi 9707	141.64	Mondi Limited
Sub 6 of Lot 99 - Umlalazi 9707	52.74	Mondi Limited
Rem of Lot 100 - Umlalazi 12848	130.33	Mondi Limited
Rem of Sub 2 of Lot 100 - Umlalazi 12848	245.60	Mondi Limited
Rem of Por 3 of Lot 100 - Umlalazi 12848	84.44	Mondi Limited
Rem of The Ranche 11368	248.32	Mondi Limited
Rem of Por 1 of The Ranche 11368	230.96	Mondi Limited
The Farm Carlyle 13747	47.27	Mondi Limited
The Farm Baton Rouge No. 17433	387.44	Mondi Limited
The farm Viellands 15745	225.33	Mondi Limited
Sub 3 of Lot 91 Umlalazi 10011	108.09	EXXARO
Rem of Lot 91 Umlalazi 10011	122.80	EXXARO
Sarcola 16183	3.30	EXXARO
National Road Proclamation 2827/1990		SANRAL
ESKOM servitude on Portion 3 of Lot 88 Farm Emoyeni No 7905		Murray
TOTAL mine lease area	4 143.32	

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MTUNZINI CONSERVANCY

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First Respondent

UMLALAZI MUNICIPALITY

Second Respondent

FOUNDING AFFIDAVIT

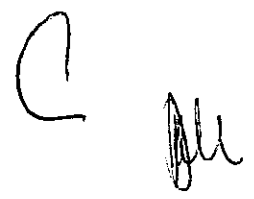
I, the undersigned,

BARBARA LUISE CHEDZEY

do hereby make oath and say:

1.

I am an adult female, the managing director of the applicant herein.



2.

As such, I am duly authorised to institute these proceedings on behalf of the applicant.

3.

I confirm that the facts deposed to below fall within my own personal knowledge, save to the extent that the context suggests otherwise. Where I make legal submissions, I do so based on the advice of the applicant's legal representatives.

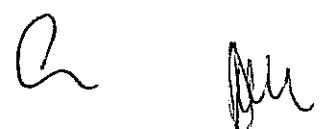
The parties

4.

The applicant is the MTUNZINI CONSERVANCY, an association incorporated under section 21 of the Companies Act of 1973, which has registration number 2007/006455/08 and its registered office at 11 Ukula Street, Empangeni, within the area of jurisdiction of this Honourable Court. The applicant's address for the purposes of this application is care of Norman Brauteseth & Associates, 4 Caebron Avenue, Westville, Durban.

5.

The first respondent is TRONOX KZN SANDS (PTY) LIMITED, a company with limited liability duly incorporated and registered in accordance with the provisions of the Companies Act, No. 61 of 1973, which was formerly known as EXXARO SANDS (PTY) LTD and whose attorneys, Shepstone & Wylie, have consented to service of these

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papers being effected on their offices at 24 Richefond Circle, Ridgeside Office Park, Umhlanga Rocks.

6.

The second respondent is the UMLALAZI MUNICIPALITY, which:

- (a) is a Category B municipality, as defined in Section 155(1) of the Constitution of the Republic of South Africa;
- (b) was duly established in terms of Section 12 of the Local Government: Municipal Structures Act No 17 of 1998;
- (c) carries on its functions from its head office in Hutchinson Street, Eshowe.

7.

No relief is sought against the second respondent, which is cited merely as an interested party.

The Relief sought

8.

The applicant seeks an order against the first respondent interdicting and restraining it forthwith from commencing or continuing any "development", as defined in section 1

read with section 38(3) of the KwaZulu-Natal Planning and Development Act, Act No. 6 of 2008 (*the Act*), on the properties listed in the document annexed to the Notice of Motion and marked "A" (*the Fairbreeze properties*).

9.

The applicant seeks a further order to the effect that the said interdict will endure only until the first respondent has the necessary development approval of the second respondent.

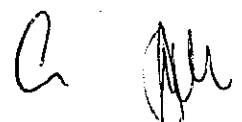
10.

The Fairbreeze properties are situated within the area of jurisdiction of the second respondent. It follows that the harm which the applicant apprehends will be suffered as a result of the conduct of the first respondent will be suffered within the jurisdiction of this Honourable Court, which, I respectfully submit accordingly has jurisdiction to determine this application.

Background and sequence of relevant events

11.

The first respondent, which is the owner or lessee of the Fairbreeze properties, has been engaged for some years in seeking all the necessary approvals in order to commence a heavy minerals mining operation on the said properties. The operation is to be known as the Fairbreeze mine.



12.

The approvals required by the first respondent include:

- 12.1 an environmental authorisation in terms of section 24 of the National Environmental Management Act, No. 107 of 1998 ("NEMA");
- 12.2 an amendment to the applicable Environmental Management Programme Report ("EMPR") in terms of section 39 of the Minerals and Petroleum Resources Development Act, No. 28 of 2002 ("MPRDA");
- 12.3 the necessary Water Use Licences under the relevant provisions of the National Water Act , No. 36 of 1998; and
- 12.4 the approval of the second respondent for mining and related development of the Fairbreeze properties.

13.

It is with the last of these approvals that the applicant is concerned in this application.

14.

The first respondent (then EXXARO Sands (Pty) Ltd) applied in terms of NEMA for environmental authorisation from the KZN Department of Agriculture and Environmental



Affairs ("DAEA"). The applicant participated in that process as an interested and affected party. It is clear from the documents put up by the first respondent to the DAEA that the mining area will extend to within 100 metres of the town of Mtunzini.

15.

The first respondent (in the name of Exxaro KZN Sands (Pty) Ltd) was granted environmental authorisation by the DAEA for the Fairbreeze mine under and in terms of an environmental authorisation issued on 12 July 2012 under reference number DC28/0036/2010.

16.


The first respondent also obtained an approval for the amendment of the EMPR under and in terms of an approval from the Department of Minerals and Energy.

17.

The first respondent has not yet been granted a water use licence for the Fairbreeze Mine and that application is still pending.

18.

The applicant has been a registered interested and affected party in all of the above application processes, and has submitted comments, objections and detailed representations at every opportunity afforded to it by the first respondent and its

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consultants. Since those processes are not germane to this application, the applicant does not propose to provide any documentation or additional detail relating thereto.

19.

Suffice it to say, however, that the applicant has lodged an appeal with the KZN MEC for Agriculture and Environmental Affairs in terms of section 43 of NEMA, against the environmental authorisation. The applicant understands that at least 4 other interested and affected parties have also lodged appeals with the MEC. The applicant is furthermore in the process of reviewing the amended EMPR with a view to possibly lodging an appeal against that approval with the Minister of Minerals and Energy.

20.

This application relates to the first respondent's failure to have obtained any land use approval whatsoever for any non-agricultural uses for the Fairbreeze properties, in particular for the mining and related development associated with the Fairbreeze mine.

21.

The applicant has flagged this issue at every relevant point in the application processes. I will not burden this record with all of those occasions: suffice it to say that, when it was suggested (in the course of the environmental assessment process conducted by the first respondent and its consultants) that there was no need to apply for planning approval for the mining activities, the applicant disputed that stance and in fact investigated and made detailed representations to the contrary.



The Applicable Law

22.

The KwaZulu-Natal Planning and Development Act ("the Act") applies to all "development" in the province of KwaZulu-Natal, which term is defined in section 1 as:

"in relation to any land, ... the erection of buildings and structures, the carrying out of construction, engineering, mining or other operations on, under or over land, and a material change to the existing use of any building or land for non-agricultural purposes".


23.

In terms of section 38 (1) of the Act, *"the development of land situated outside the area of a scheme may only occur to the extent that it has been approved by a municipality in whose area the land is situated"*.

24.

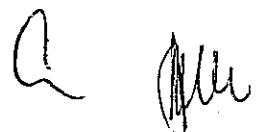
Section 38(3) of the Act deals with development of land which is situated outside the area of a scheme, as defined in the Act, and states as follows:

"(3) For the purpose of this Chapter, development means the carrying out of building, construction, engineering, mining or other operations on, under or

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over any land and a material change to the existing use of any building or land without subdivision, but does not include –

- (a) the construction or use of the first dwelling and outbuildings or improvements usually associated therewith on a separately registered subdivision, including a secondary self-contained residential unit which may be attached or detached but must be clearly associated with the first dwelling house and may not exceed 80m²;*
- (b) the construction or use of any dwelling and outbuildings usually associated therewith for a settlement of a traditional household on land on which a traditional community recognised in terms of section 2(5)(b) of the KwaZulu-Natal Traditional Leadership and Governance Act, 2005 (Act No. 5 of 2005) lawfully resides;*
- (c) land used for the cultivation of crops for the rearing of animals;*
- (d) the carrying out of works required for the maintenance or improvement of an existing road within its existing boundaries;*
- (e) the provision of any engineering services in accordance with the municipality's integrated development plan, and*
- (f) the maintenance and repair of engineering services."*



25.

Section 75(1)(c) of the Act provides that a person is guilty of an offence "*when developing land without prior approval in terms of this Act*".

26.

In the judgment of the Constitutional Court in the matter of *Maccsand (Pty) Ltd vs City of Cape Town & Others* 2012 (4) SA 181 (CC), the Constitutional Court held that a mining right or mining permit granted in terms of the MPRDA does not entitle the holder of the mining right to conduct mining activities contrary to the zoning of that land under legislation which regulates the use of land in that area.

The Facts

27.

The Fairbreeze properties are situated within the area of the second respondent, but outside the area of the town planning scheme of the second respondent. They have to date been used and are still used principally for sugar farming and forestry activities.

28.

The applicant has for some time been seeking clarity on whether or not the first respondent has the requisite zoning rights and approval to utilise the Fairbreeze properties for mining. In that regard, I respectfully point out that the Act only came into operation on 1 May 2010. Its precursor in Kwazulu-Natal was the Natal Town Planning Ordinance, No. 27 of 1949 ("the Ordinance"), in terms of which land use rights in

a *W*

respect of properties situated outside the areas of town planning schemes were overseen by the provincial government.

29.

In order therefore to clarify whether some previous planning approval had been given for the Fairbreeze Mine, the applicant's attorneys made extensive enquiries with the relevant provincial departments, who informed them that no zoning or other approval had ever been granted either under the Ordinance, or the Act. I verily believe this to be the case and the first respondent does not appear to contend otherwise.

30.

In view of escalating rumours regarding the first respondent's intention to commence mining, on 31st of August 2012, the applicant's attorneys wrote to the second respondent, advising it of the outcome of its investigations and requesting clarity on whether the second respondent had any knowledge of any land use application that had previously been approved for the Fairbreeze Mine. I attach a copy of that letter hereto, marked as annexure "B".

31.

The second respondent's municipal manager replied to the Applicant's attorneys on 13 September 2012, advising them that, in the second respondent's view, the first respondent needed "*development authorisation, in terms of the appropriate legislation*" and that a representative of the first respondent had met with the second respondent's

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relevant officials to discuss "*the technical requirements of a potential PDA Application for Mining rights....*". I attach a copy of that letter hereto marked "C".

32.

The municipal manager concluded his letter by confirming that the second respondent would "*take prompt action, in terms of section 8 of the [Act], should any person attempt to commence 'development' of the properties (as defined) without the necessary development approval*". I respectfully submit that it is clear from this letter that the first respondent has not sought or been granted approval by the second respondent for the development of the Fairbreeze properties.

33.

The applicant was then alarmed to read in an article in the "Zululand Observer" on 14th September 2012 that the first respondent would be commencing construction of parts of the proposed Fairbreeze heavy minerals mine "*on Wednesday*". I attach a copy of that article hereto, marked as annexure "D".

34.

In that article it appeared that the first respondent considered that the approval of its amended EMPR entitled it to commence its mining operations while "*awaiting further authorisations*".

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35.

The applicant assumed that the "further authorisations" referred to included the necessary development approval required in terms of the Act.

36.

The applicant's attorneys then wrote to the first respondent's attorneys on the 18th of September 2012, attaching their correspondence with the second respondent. In this letter a request was made for a confirmation from the first respondent that no mining activities would commence until such time as it had obtained the necessary development approval. The applicant's attorneys made it plain that any attempt to commence mining would be met with an application for an urgent interdict. I attach a copy of that letter hereto, marked as annexure "E". Initially, no response was received to that letter.

37.

On 28 September 2012, Stanley Whitfield, an Mtunzini Conservancy committee member and chair of the mining subcommittee attended a meeting of an environmental forum convened by the first respondent. At that meeting the first respondent's representatives advised the meeting that the first respondent intended to commence mining construction activities on Monday 1 October 2012.

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38.

Stanley Whitfield immediately informed the applicant's attorneys, and they wrote a letter to the first respondent's attorneys later that day, in which they requested urgent clarity on the first respondent's intentions. I annex a copy of that letter hereto marked "F".

39.

The first respondent's attorneys responded by e-mail on the 29th of September 2012, indicating that their client was awaiting advice from senior counsel and that in the interim they would defend any application brought by the applicant. They threatened the applicant with a costs order and with an application for financial security. I annex hereto a copy of that email marked annexure "G".

40.

On 5 October 2012 and by letter of that date, a copy of which is annexed hereto marked "H", and while the applicant's attorneys and counsel were preparing urgent application papers, the first respondent's attorneys replied to the letters, annexures "E" and "F" hereto. They conceded that the first respondent had commenced mining activities on 1 October 2012, including establishing platforms on the primary wet plant area and the construction of certain link or access roads.

41.

The first respondent's attorneys contended *inter alia* that:



- 41.1 mining commenced lawfully on blocks FBA, FBB, FBC and FBD "*well before the amendment of section 11 of the [Ordinance]*" and that "*at that time mining did not fall within the ambit of that section and as such no development permission was required*";
- 41.2 this had been "*confirmed*" by the KZN Department of Local Government and Traditional Affairs in a letter dated 15 February 2006 (a copy of which is annexure "B" to the letter, annexure "B" hereto);
- 41.3 the requirements of the Act cannot be applied retrospectively.

42.

The applicant's attorneys' request for an undertaking was accordingly refused.

43.

Section 11 of the Ordinance was amended with effect from 10 October 2008. I annex hereto marked "I" a copy of the section prior to amendment and marked "J" a copy of the section after its amendment. Of particular importance is the definition of the word "*development*" in the earlier version of section 11: "*the erection of buildings or the use of land without subdivision for non-agricultural purposes*" (emphasis added).

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44.

I respectfully submit that mining is clearly a use of land which is non-agricultural. The first respondent's commencement of mining activities before 10 October 2008 was accordingly unlawful.

45.

For the sake of completeness, I wish to clarify that the first respondent also does not have approval for a private township, as contemplated in section 11(2)(a)(iii) of the earlier version of section 11 of the Ordinance (annexure "I"). Neither has it been exempted in terms section 11(3) from any of the provisions of the Ordinance.

46.

I respectfully submit that the first respondent's reliance upon the provincial department's letter of 15 February 2006 is misplaced. The letter, as a matter of law, wrongly advises that "*no development or subdivision application is required in terms of the [Ordinance] to conduct mining operations on land located outside of Town Planning Scheme areas*". Section 11 (annexure "I" hereto) is to the contrary. The first respondent's representatives, whose letters of 18 November 2005 and 19 January 2006 are replied to, clearly knew better.

47.

In all the circumstances, I respectfully submit that the first respondent is in breach of the Act.

A *DK*

Locus standi

48.

The applicant has a material interest in the commencement of mining activities. It is an interested and affected party in all of the approval processes that have been described above, and it has lodged an appeal against the environmental authorisation with the MEC for Agriculture and Environmental Affairs in terms of section 43 of NEMA.

49.

The applicant also has *locus standi* by virtue of the provisions of section 38 of the Constitution and section 32(1) of NEMA. Clearly, the environmental rights of the applicant and the public, as enshrined in section 24 of the Constitution, are in jeopardy.

Interdict requirements

50.

The applicant, I am advised, has a "clear right" to have the first respondent interdicted from commencing or continuing mining operations until any and all requisite land use approvals have been granted.

51.

The commencement of mining evidences a clear disregard for the law, including the rule of law, and constitutes an offence under section 75 of the Act. The first respondent is



infringing the applicant's and the public's environmental rights. That amounts to an on-going injury.

52.

It is clear that the first respondent decided to act in advance of any legal advice. That much is evident from the e-mail from its attorneys dated 29 September 2012, annexure "G" hereto. If it had in fact received legal advice to the effect that the commencement of mining was lawful, its attorneys would have made that averment rather than that it was seeking senior counsel's opinion. The first respondent clearly proceeded at risk.

53.

There can, with respect, be no justification for the commencement of mining in these circumstances. I should point out that, as far as I am aware, the second respondent's Integrated Development Plan makes no reference to mining in this locality, and in view of the proximity of the proposed mine to the town of Mtunzini, the applicant suspects that obtaining planning approval will be considerably more difficult than the first respondent may assume.

54.

In the interim, the First Respondent will have substantially altered the landscape and its intention by commencing mining at this stage may be solely to create a situation which ultimately cannot be reversed. In this regard, I annex hereto marked "K" and "L" copies of photographs taken of the works on 4 October 2012. Although I did not take the



photographs, I am able from my own personal observations to confirm that they depict the situation on that date.

55.

The applicant accordingly seeks the relief sought in the notice of motion to prevent this from happening.

56.

In the light of the first respondent's blatant disregard for planning process and development law, the applicant has no way of preventing the commencement of mining activities, other than by approaching this Honourable Court for relief. The second respondent has not taken any steps, let alone the "*prompt action*" promised in their letter, annexure "C" hereto.

57.

Insofar as interim relief may be sought in this matter, I respectfully submit that, on the facts, the balance of convenience overwhelmingly favours the applicant. The chronology of correspondence in this matter will, it is respectfully submitted, demonstrate that the applicant alerted the first respondent to the planning issue well before the present activities commenced.



58.

It is also evident from annexure "C" hereto that a town planner, Mr Henri Cullinan (of Vuka Planning Africa Inc), employed by the first respondent, had a meeting with the second respondent on 22 February 2012, at which a development approval application was discussed. The first respondent could therefore be under no misapprehension as to the second respondent's stance and the requirement for such approval prior to commencement of mining. It obviously decided that it would not make that application, and it still has not. Any delay therefore to its mining commencement is entirely of its own making.

Costs

59.

In the light of the first respondent's blatant and persistent disregard for the law, the applicant seeks an order for costs on an attorney and client scale. In this regard, I mention also that the activities of the applicant, the main business of which is the promotion of a wildlife and environmental conservancy in the greater Mtunzini area, are carried on in a non-profit manner, with an altruistic or philanthropic intent.

Urgency

60.

It is respectfully submitted that there is clear urgency in this matter as:



- a) The first respondent commenced mining on 1st October 2012 and will continue unless it is interdicted from doing so. The first respondent's stance in this regard was only clarified by way of its attorneys' letter dated 5 October 2012.
- b) The mining activities will have a huge negative impact on the environment and on the town of Mtunzini, as has been made plain in all of the approval processes engaged in to date. Extensive areas of wetland and indigenous forest fall to be destroyed, and various streams and rivers fall to be badly affected. The town of Mtunzini will in all probability suffer dust, noise and other nuisance, and all of these are matters which must in due course be considered by the second respondent in terms of the Act when the necessary application is made.
- c) In order to avoid making that process a complete farce, it is necessary to stop the first respondent from effectively taking the law into its own hands and rendering obsolete the duty of the second respondent under the Act.

WHEREFORE, on behalf of the applicant, I humbly pray that this Honourable Court will grant the relief set out in the Notice of Motion prefixed hereto.



BARBARA LUISE CHEDZEY



I certify that the deponent has acknowledged that he knows and understands the contents of this affidavit which was sworn to and signed before me at *Westville* on this *10th* day of *October*, 2012, the regulations contained in Government Notice No R.1258 dated 21 July 1972 having been complied with.



COMMISSIONER OF OATHS

ANTHONY GORDON CLULOW
COMMISSIONER OF OATHS
PRACTISING ATTORNEY R.S.A.
14 ACACIA AVENUE
WESTVILLE 3630

