



Your Ref: S.004-005-2020/1F
Refer to: Sagwadi Ringani
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S.004-005-2020/1F - Community Development and Small Contractor Training for the Upgrade of Gravel Roads P372, P148, D897, D30, P60, D1348, L1190, L1333 & D2286 in Isandlwana.

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Subject: GRAVE MANAGEMENT PLAN

1. INTRODUCTION

Imbawula Civil Projects (Pty) Ltd (ICP) are appointed to provide professional services for the Upgrade of gravel roads P372, P148, D897, D30, L1190, L1333 and D2286 in Isandlwana on behalf of the South African National Roads Agency SOC Ltd (SANRAL). The total road length is approximately 62km. The project is split into two (2) phases, Phase 1 being P372 that is 32km in length and Phase 2 includes P148, D897, D30, L1190, L1333, D2286 and road to Isandlwana that accumulates to 30km road length. The upgrade from gravel to surfaced road will be undertaken by SANRAL on behalf of the KZN Department of Transport. The Route is situated in the Isandlwana Heritage Site area which is a famous tourist attraction and forms part of the Battlefield Route of KwaZulu Natal.

QPoint Group are the appointed environmental consultants for this project. They are responsible for the application of Environmental authorisation and all relevant Licenses, i.e., the Water Use License, etc. As part of these processes a Heritage Impact Assessment (HIA) was conducted by Umlando: Archaeological Surveys and Heritage Management and the KwaZulu-Natal Amafa and Research Institute (KZNARI) subsequently commented on the project.

Isandlwana Heritage Site area is known to have high archaeological, historical and palaeontological sensitivity. The desktop noted thirty-two (32) homesteads from 1944, and fifty-one (51) from 1950-1964, occurring within 50m of the proposed roads. The field survey recorded fifty-one heritage sites. Most of these sites were graves and/or cemeteries and forty-two require further mitigations. This document serves as the Heritage Site Management Plan (HSMP) for Grave 18 (which **consists of six (6) graves** as illustrated as a white polygon in Figure 1 below) and Grave 22 that are within the recommended 20m buffer zone and requires mitigations. The objective, purpose and goal of the HSMP is briefly outlined below:

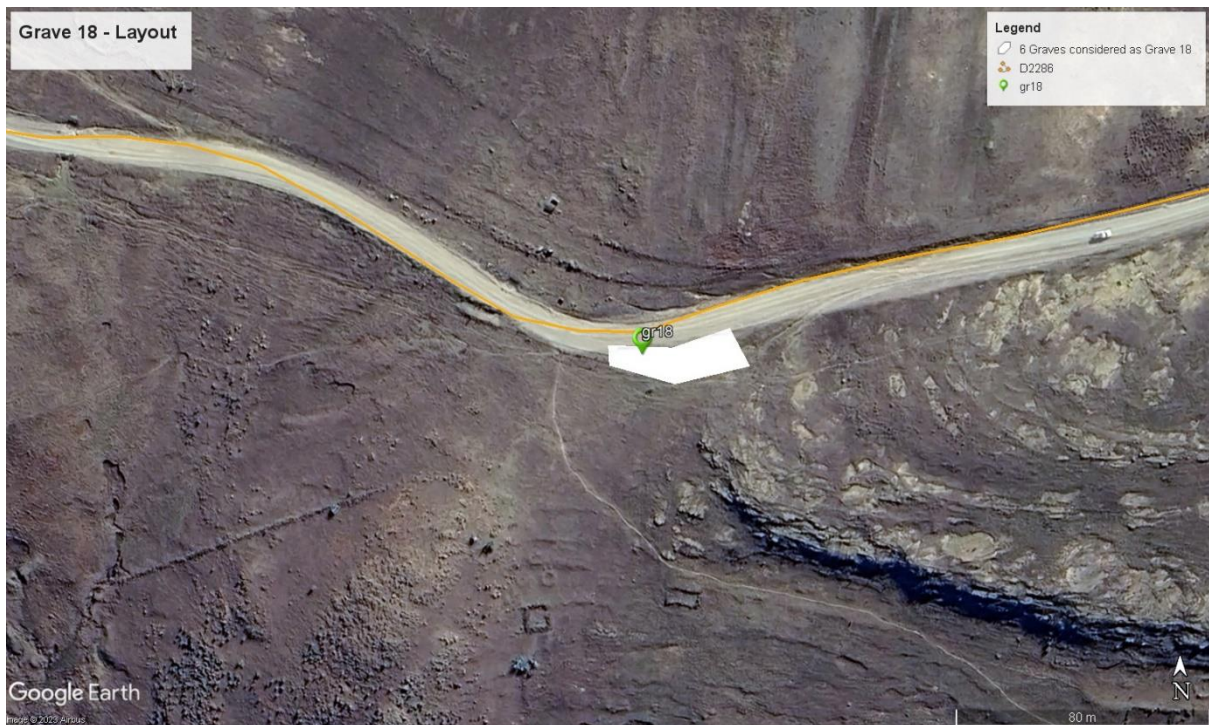


Figure 1: Grave 18 - Consists of 6 graves sourced from Google Earth Pro

1.1. Document Objective

Develop an implementable HSMP to comply with Section 38(g) of the KwaZulu-Natal Amafa and Research Institute (KZNARI) that defines management and mitigation measures for in situ conservation of graves that aims to remove/reduce the risk to the heritage resource.

1.2. Purpose

The purpose of this HSMP is to:

- Recognise the significance and sensitivity of the identified and potential unidentified cemetery/ burial grounds (graves) as per the HIA;
- Understand the potential risks to the cemetery/ burial grounds (graves) from the road construction operations.
- Ensure that the potential risks are assessed and controlled to an acceptable level.

1.3. Goals and Aim of the HSMP

1.3.1. Goals

The goals of the HSMP for the project are to ensure the following:

- Increase general awareness of the identified and potential unidentified cemetery/ burial grounds;
- A balanced approach between development - upgrade from gravel to surfaced road, conservation and utilization;
- Provide clear guidelines on cost effective maintenance and management of the identified burial grounds in and around during construction.

1.3.2. Aims

The aims of the HSMP for the project include:

- To define site management responsibilities for the identified graves;
- To provide clear management actions for the identified graves as well as chance finds;
- To provide a management framework to monitor and define the success of the HSMP.

1.4. Principles and legal framework

The principles of this document are informed by the following legislative framework.

Table 1. Legal guidelines considered.

Applicable guidelines considered	Reference where applied
Development of an HSMP as provided for in Section 47 (3) of the KwaZulu-Natal Amafa and Research Institute Act of 2018	Compilation of a HSMP was commissioned to ensure the responsible management of identified and potentially unidentified grave sites on the properties earmarked for agricultural development.
The Extension of Security of Tenure Act, 1997. Chapter III Section 6(4)	Any person shall have the right to visit and maintain his or her family graves on land which belongs to another person, subject to any reasonable condition imposed by the owner or person in charge of such land in order to safeguard life or property or to prevent the undue disruption of work on the land.
KwaZulu-Natal Amafa and Research Institute Act of 2018	<p>(3) No person may, without a permit issued by the KZNARI or a provincial heritage resources authority—</p> <p>(d) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;</p> <p>(e) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or</p> <p>(f) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.</p>

2. BACKGROUND TO THE PROJECT

Imbawula Civil Projects (Pty) Ltd has to provide management plan for the in-situ preservation of grave 18 and 22 whose families are yet to be determined. This included a site visit to assess site conditions and subsequently to develop a HSMP to ensure the continued in-situ protection of the identified graves.

2.1. Location

The proposed project is located at Nquthu/Isandlwana area which is within the jurisdiction of the Nquthu Local Municipality and uMzinyathi District Municipality in the KwaZulu-Natal. The project is split into 2 phases, Phase 1 being P372 and Phase 2 includes P148, D897, D30, L1190, L1333, D2286 and road to Isandlwana.

Phase 1 is the main provincial route P372 commencing from P372 & R68 intersection (at Luvisi Village) with latitude and longitude coordinates of (Lat/Lon: 28°12'53"S, 30°39'40"E). The road then goes in a south westerly direction through to Isandlwana Battlefield with latitude and longitude coordinates of (Lat/Lon: 28°21'20"S, 30°39'15"E). From Isandlwana Battlefield the road continues in a south easterly direction to ends at P372 & R68 intersection (at Ngwebeni Village) with latitude and longitude coordinates of (Lat/Lon: 28°18'57"S, 30°43'43"E).

Phase 2 are rest of the local and district connecting roads P148, D897, D30, L1190, L1333, D2286 and road to Isandlwana.

2.2. Nature of the development

The nature and extent of the proposed infrastructure development, the upgrade of Isandlwana gravel roads to all-weather surfaced road, gives access to Isandlwana Battlefield Heritage Site and is in close proximity of the grave 18 (Lat/Lon: 28°20'29.19"S, 30°41'11.82"E) and 22 (Lat/Lon: 28°20'43.25"S, 30°41'7.74"E). This pose a significant risk of impact to the site over the short and long term and it is essential that the impact be mitigated by means of a plan of action to ensure conservation. The graves under question were discovered during the site inspection by the HIA specialists. The project entails earthworks, construction of pavement layers, providing adequate stormwater drainage facilities along the roads, erosion protection and surfacing. Grave 18 is situated approximately 4m from the edge of the road whilst Grave 22 is situated approximately 2m from the edge of the road P372. These graves will not be directly impacted by the planned infrastructure development, the client seeks to ensure the correct way to protect and manage the graves and it is imperative to implement management measures that will ensure that no indirect impacts occur on the graves due to the construction operation adjacent to the graves.

2.3. Locality Map

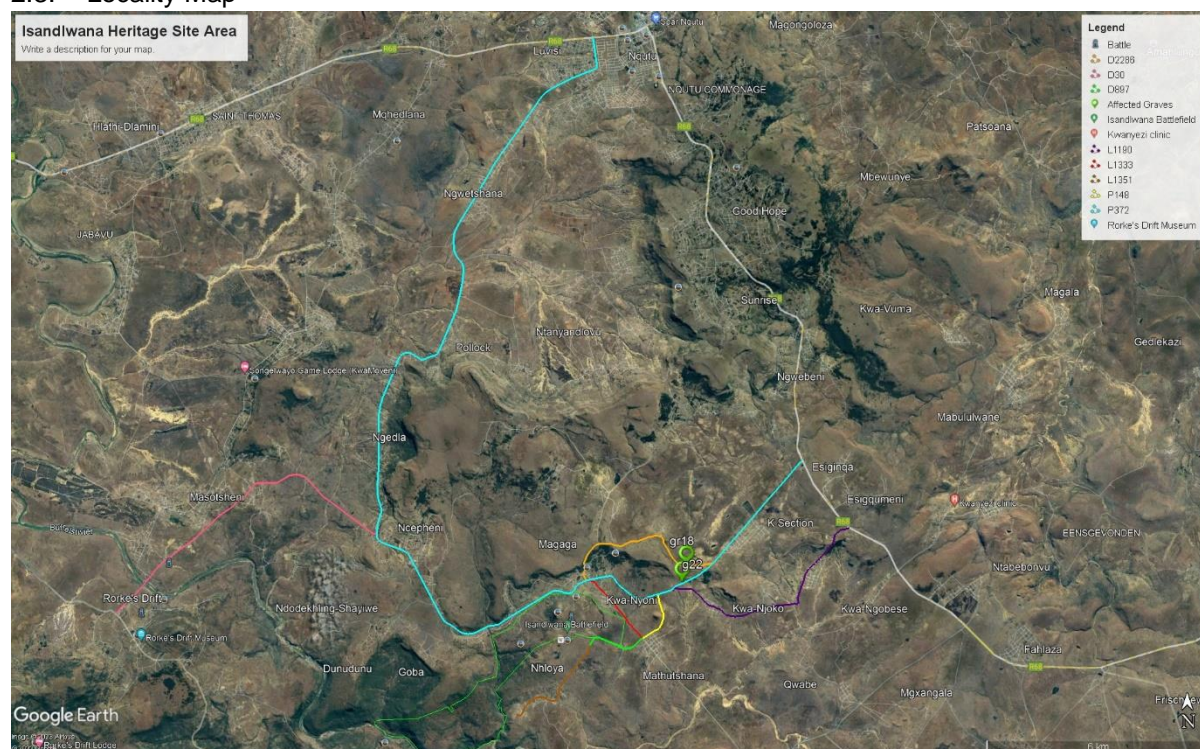


Figure 2: Locality Map sourced from Google Earth Pro

3. PROJECT SCOPE

The road upgrade includes Road P372 P148, D897, D30, P60, D1348, L1190, L1333 & D2286.

- The major aspects of this project include the following:
- Surfacing of the existing gravel road to low traffic volume standards;
- Improvement and strengthening the existing pavement structure from Gravel to Surfaced;
- Vertical and horizontal geometric improvements;
- Provision of new road signs and markings.
- Minor structures – drifts, low level crossings etc.

- Trial section using nanotechnology
- Slope stabilization

As the project engineers, ICP is responsible for the to develop a HSMP for Isandlwana Heritage Site for the known and affected grave 18 and grave 22 along road D2286 and P372, respectively to ensure the ongoing protection and management of the graves during construction. It is therefore important that the HSMP includes the development of preservation mechanisms that will minimise and avoid negative changes/impacts to graves.

4. SITE DESCRIPTION/GRAVES LOCATION

The HIA report has identified and recorded the aforementioned graves. The graves consist of stone cairn on a raised area on the edge of the road but are not fenced. During the site visit it was clear that the graves are not maintained and overgrown vegetation around the grave. See Figure 2 and Figure 3 below.



Figure 3: Grave 18 and surroundings



Figure 4: Grave 22 and surroundings

5. DATA INTERPRETATION: ASSESSMENT OF SIGNIFICANCE

5.1. Significance of Sites

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface.

This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites that will be impacted on. The following criteria were used to establish site significance:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites;
- Potential to answer present research questions.

Furthermore, The KwaZulu-Natal Amafa and Research Institute Act (Act 2018, Sec 3) distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

Although the Graves in the cemetery were not assessed against historic criteria as defined in Section 3(3) of the KZNARI, it should be noted that graves and burial sites have specific connections to communities or groups for spiritual reasons. The significance is universally accepted. The cemetery is well preserved and the integrity of the cemetery is considered to be excellent.

5.2. Field Rating of Sites

Site significance classification standards prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report.

SITE SIGNIFICANCE	FIELD RATING	GRADE	RECOMMENDED MITIGATION
High Significance	National Significance	Grade 1	Site conservation / Site development
High Significance	Provincial Significance	Grade 2	Site conservation / Site development
High Significance	Local Significance	Grade 3A/3B	Site conservation or mitigation prior to development / destruction
High / Medium Significance	Generally Protected A		Site conservation or mitigation / test excavation / systematic sampling / monitoring prior to or during development / destruction
Medium Significance	Generally Protected B		On-site sampling monitoring or no archaeological mitigation required prior to or during

SITE SIGNIFICANCE	FIELD RATING	GRADE	RECOMMENDED MITIGATION
			development / destruction

Graves are considered to be of high social significance and based on this is given a Generally Protected A field rating.

6. HERITAGE MANAGEMENT ACTIONS/MITIGATION

6.1. Heritage Management Actions

In terms of the day-to-day management of grave 18 along road D2286 and grave 22 along road P372, which forms part of both phase 1 and 2 of the upgrading of Isandlwana roads project. The following preservation mechanisms are suggested:

Table 2: Management Actions

Objective	Action	Responsible Party
Avoid accidental damage or destruction of the graves during construction activities	<ul style="list-style-type: none"> - The relevant families will be identified and informed about the proposed activities which could possibly affect their graves. The planning team will also ensure that access to the graves is not limited in any way. - Reinforcement of the identified graves, the roads will be cut up to the maximum depth of 300mm, therefore it is not envisaged that the human remains be exposed. - Increase awareness of the site (training and indication on development plans) - Indicate the graves on all Construction layout plan. - Fence the Graves and clearly mark/ demarcate with danger tape entire duration of the project and especially during earth-moving activities. - Maintain the achievable (3-5m) buffer zone around the Grave for the duration of the project. The roads under design are existing, the TRH24 design procedure limits the alteration of existing roads, hence realignment of the road to meet the recommended 30m as recommended by KZNARI buffer is not achievable. - Earth-moving activities will be altered and planned around these graves in order to protect them from any damage or other negative impacts. The use of machinery will be minimised around within the radius of 30m from the grave - Earth-moving crews will be made aware of the graves in order that the graves will not be damaged during the earth- moving activities. - The above will be achieved by providing clear and easy signage to enhance awareness. 	Resident Engineer / Site Safety Management / Site Safety Representative
Ensure continuous protection of the cemetery	<ul style="list-style-type: none"> - Future developments in these areas will be limited and if development cannot be avoided in these areas, the development will be subject to KZNARI approval and the correct permit application procedure. - The site should be monitored and maintained (cleaned) on an ongoing basis 	Management

6.2. Heritage Awareness

It is important to ensure that all employees and contractors working within the Isandlwana Heritage Site operations are aware of the applicable heritage legislation and how to identify grave on sites as well as what heritage resources are. This will be communicated during induction training as well as through notices placed in strategic places.

Should the above recommended measures and by implication, impact on any human burial proves inevitable, the grave should be relocated with the required permits from the KZNARI and according to the required process from the KZNARI but must be seen as a last resort. This process should be undertaken by a qualified archaeologist, and in accordance with relevant legislation, permitting, statutory permissions and subject to any local and regional provisions and laws and by-laws pertaining to human remains. The grave relocation process must include as a minimum:

- A detailed social consultation process, that will trace the next-of-kin and obtain their consent for the relocation of the graves, that will be at least 60 days in length;
- Site notices and newspaper advertisements indicating the intent of the relocation;
- Relevant permits from the local authority and Provincial Department of health as well as a permit from the KZNARI for graves older than 60 years or unidentified and presumed older than 60 years;
- An exhumation process that demonstrates respect for the remains and family;
- The whole process must be managed preferably by a company that has a proven track record in grave relocations;
- The process must be conducted in such a manner as to safeguard the legal rights of all parties involved.

7. CHANCE FIND PROCEDURES

The following procedural guidelines must be considered in the event that previously unknown heritage resources or burial grounds and graves are exposed or found during the life of the project by activities such as bush clearing:

Chance Find Procedures: Burials and Graves

In the event that previously unidentified burial grounds and graves are identified and/or exposed during construction or operation of the Project, the following steps must be implemented subsequent to those outlined above:

- The project archaeologist must immediately be notified of the discovery in order to take the required further steps:
 - The local South African Police Service (SAPS) will be notified on behalf of the client;
 - The project archaeologist will inspect the exposed burial and determine in consultation with the SAPS if any additional graves may exist in the vicinity as well as the temporal context of the remains, i.e.:
 - forensic
 - authentic burial grave (informal or older than 60 years, KZNARI (2018) Section 36); or
 - archaeological (older than 100 years, KZNARI (2018) Section 38);
- Should the specialist conclude that the find is a heritage resource protected in terms of the KZNARI (2018) Section 36 and KZNARI (2018) Regulations (Regulation 38, 39, 40), the project archaeologist will notify KZNARI on behalf of client;
- KZNARI may require that an identification of interested parties, consultation and /or grave relocation take place;
- Consultation must take place in terms of KZNARI (2018) Regulations 39, 40, 42; and 5. Grave relocation must take place in terms of KZNARI (2018) Regulations 34.

The roads to be upgraded are public roads that are utilised on a daily basis. For the project of this nature, it is unlikely that previously unknown heritage resources or burial grounds and graves are exposed or found during the project construction.

8. CONCLUSION

The above-mentioned parties (Imbawula Civil Projects, QPoint Group, and Umlando: Archaeological Surveys and Heritage Management) on behalf of SANRAL should be commended for recognising that graves are special places that link communities to the past, memorialise deceased and serve as sacred places to remember and celebrate their lives and as owners of the property will endeavor to maintain in situ conservation of the site and also for their swift management of the find.

We recommend that the proposed mitigations under section 6 of the report be considered in order to achieve the project objective with desired design solutions/expectations.