



**KSEMS**  
environmental consulting

17<sup>th</sup> April 2014

Attention: Bernadet Pawandiwa  
To: Amafa/Heritage KwaZulu-Natal  
Tel: 033 394 6543  
Email: [bernadetp@amafapmb.co.za](mailto:bernadetp@amafapmb.co.za)

RE:

**CONSTRUCTION OF A PUMP STATION AND ASSOCIATED PIPELINE AND TOILETS AT WP 265 EX4, UMLAZI (SAH13/5089)**  
**CONSTRUCTION OF A PUMP STATION AND ASSOCIATED PIPELINE AND TOILETS AT WP 84 V5-6-7, UMLAZI (SAH14/5262)**

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Dear Ms Bernadet Pawandiwa,

The comments received from AMAFA/ KwaZulu-Natal on the abovementioned projects have reference.

The eThekweni Metropolitan Municipality have numerous current and potential sanitation projects within the Umlazi informal settlement and surrounding areas, the area covered by the ablution facilities and associated pipelines is extensive and the compilation of a Heritage Impact Assessment for the entire site is not practical due to the extent and time sensitivity of these sanitation project. The location of the ablution facilities, associated pipelines and pump station have been selected in consultation with the local community, with the community continuously being consulted throughout the construction phase. Therefore any gravesites will be identified by the local community and no ablution blocks or pump station will be placed near informal graves with the pipelines being able to be adjusted accordingly, preventing any damage to potential gravesites.

To ensure protection of heritage resources, it has been stated within the Basic Assessment Reports (BARs) and Environmental Management Programmes (EMPrs) that if any graves are identified onsite all development activities in the vicinity of the grave site must cease until further notice, Amafa must be contacted and no structures that are older than 60 years are allowed to be demolished altered or destructed without first receiving a permit from AMAFA.

KERRY SEPPINGS ENVIRONMENTAL MANAGEMENT SPECIALISTS CC

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MEMBERS: K.A. STANTON (DIRECTOR)

Therefore if any grave site is discovered during construction a Heritage Practitioner may be brought onsite, if required, and an impact assessment conducted and submitted to Amafa to assist in the process of ensuring the gravesite is protected and construction activities may continue. Construction workers will undergo induction training before construction activities occur which will include the abovementioned information regarding the identification of gravesites and process to follow should a site is located.

The sanitation projects in the Umlazi area are part of eThekweni Municipality Water and Sanitation Departments' community upliftment and are a public amenity to provide approximately 800,000 people living in these informal settlements access to running water and toilet facilities. KSEMS requests that AMAFA review their requirement for a Heritage Impact Assessment to be undertaken, as conditions have been implemented to ensure that gravesites are identified prior to any construction commencing through the extensive community liaison that is being carried out for the projects. Any Heritage Resources buried beneath the surface that would be exposed as a result of construction activities will be dealt with as indicated in the paragraph above and in the BAR and EMP. Please advise whether a Heritage Impact Assessment will be required for the abovementioned projects and other similar sanitation projects in the Umlazi area.

Kind Regards,

Colin Holmes  
Lead Environmental Scientist



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