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1 December 2016

## **APPLICATION FOR DESTRUCTION OF LIA STONE WALLING: Portion 10 of the Farm Kopleegte No 1154, near Colenso, Okhahlamba Local Municipality, Uthukela District, Kwazulu-Natal (CASE ID 10465)**

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On 26 January 2016 Amafa commented on the proposed conversion of grazing land to agricultural land. Our letter clearly states the cultural significance of the area, the aim being to protect the sites in this landscape (Attachment I).

The conditions set for this development stipulated:

- **That a proper management plan was to be lodged with Amafa before development proceeds.** This has not been lodged.
- **The pivots are to be placed as agreed.** According to communication - dd 11 January 2016 - between Susan Carter-Brown (owner of "NatureStamp") and Edu Boettiger ("Irritech"), none of the wheel tracks of the pivots would intersect the heritage sites or their buffers (Attachment II). Amafa's approval for the development was based on the placement of the pivots where they would not impact on the stone walling and graves.

### **BURIALS**

*"All graves need to be adequately demarcated. The archaeological graves could be excavated; however, the graves dating to the last 100 years would require further investigation and social consultation. It would be a better option place a buffer around the graves. All graves are required to have a 5m buffer between the grave and the edge of the form of demarcation. I would recommend metal fence poles that are high enough to be seen over the crop. There also needs to be a 20m buffer between the grave(s) and the development. An alternative to buffering would be excavating the graves. However, given the space constraints on this project I would support a decreased 20m buffer provided that the sites are clearly demarcated. The excavations undertaken by Anderson and Anderson (2011) clearly show that none of the excavated graves had any human remains. I would support only a 5m buffer around all the graves and other features".*

The above section in italics is quoted from the 2015 HIA by Gavin Anderson. The section highlighted in red, together with Table 2, p34 of the same report, did not clearly indicate that grave removal was to take place. The only mitigation required, as suggested by Mr Anderson in this Table, was that of demarcation. Amafa's decision to approve the development was based on this, along with the re-alignment of the pivots.

Furthermore the AmaBhele community will need to be consulted and Amafa supplied with proof of the public participation process, since they had expressed concern about their ancestral graves on the property.

**TABLE 2: SUMMARY OF MANAGEMENT PLAN & MITIGATION**

NAME	Description	SIGNIFICANCE	MITIGATION REQUIRED	BUFFER REQUIRED
E1	Engraving - not found –FP			
E2	Engraving - not found - FP			
G05/5a	Walling and graves	Low- high	Mapping, demarcate graves	5m for graves
G25	Kraal	Low	Not affected	
G26	Kraal	Low	Not affected	
G40	Grave	High	Mapping, demarcate graves	5m for graves
G40A	Grave	High	Mapping, demarcate graves	5m for graves
G50	Kraals and graves	Low – high	Mapping, demarcate graves	5m for graves
G65	Kraal	Low	Not affected	
G80	Kraal	Low	Mapping	
G81	Kraal	Low	Mapping	
G82	Graves	High	Mapping, demarcate graves	5m for graves
G83	Graves	High	Mapping, demarcate graves	5m for graves
G84	House floor	Low	Mapping	
G85	Kraal	Low	Mapping	
G86	Kraal	Low	Mapping	
G89	Grave	High	Demarcate graves	5m for graves
GG1	Grave	High	Demarcate graves	5m for graves
GG2	Grave	High	Demarcate graves	5m for graves
GG21	Grave	High	Demarcate graves	5m for graves
GLK078d	Stone walling, 2x graves?	High	Mapping, demarcate graves	5m for graves
GLK078e	kraal, houses, 9+graves	High	No disturbance	5m for cemetery
1	Cluster of Stone walling - FP	Low - high	Mapping, demarcate graves	5m for graves
3	Cluster of Stone walling – FP	Low – high	Mapping, demarcate graves	5m for graves
4	Cluster of Stone walling – FP	Low – high	Mapping, demarcate graves	5m for graves
7	Cluster of Stone walling – FP	Low – high	Mapping, demarcate graves	5m for graves
8	Cluster of Stone walling – FP	Low – high	Mapping, demarcate graves	5m for graves

## **L.I.A STONE WALLING**

If the original proposed position of the pivot points has altered, and development will now impact on the stone walling, Amafa will have to reconsider the original decision of no objection.

Based on the above, Amafa cannot at present consider the approval of either destruction permits or exhumation/excavation permits until the issues above has been clarified and attended to.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'H Roodt', is written over a light blue grid background.

H Roodt  
Principal Heritage Officer: Archaeology, Research and Compliance

## ATTACHMENT I

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26 January 2016

**Attention: Susan Carter-Brown**  
Nature Stamp  
PO Box 949  
Hilton 3245

### **Portion 10 of the Farm Kopleegte No 1154, near Colenso, Okhahlamba Local Municipality, Uthukela District, Kwazulu-Natal**

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During the site visit on 13 January 2016, some of the engraved stones referred to by F Prins could not be shown to Ms A van de Venter-Radford. There are signs of disturbance, e.g aardvark holes, and it would therefore be impossible to conclude whether the stones, if present, were removed by human or animal actions.

The general area is culturally significant. The long-term aim would be to protect the significance of sites in this landscape that extends beyond the boundaries of this farm.

We are, however, satisfied that the management suggestions proposed by G Anderson would suffice in affording the sites protection, especially since we have been notified that the pivots from the irrigation scheme will be placed in such a manner as not to impact on these sites.

We therefore have no objections to this development, on the following conditions:

- The management suggestions by G Anderson form the basis of a proper management plan to be lodged with Amafa before the development proceeds.
- The pivots are placed as agreed.
- Amafa will endeavour to seek the means to fund the digital recording and mapping of the entire cultural landscape associated with these sites.
- Amafa will encourage applicable researchers to conduct research on these sites and others associated with the cultural landscape. The landowner must therefore commit to allow access.
- Amafa will conduct public information sessions on the management of sites, such as these, with the current owner and owners of similar sites in the area which form part of the cultural landscape.

Yours sincerely



H Roodt  
Principal Heritage Officer: Archaeology

## ATTACHMENT II

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**From:** Susan Carter-Brown - NatureStamp [mailto:susan@naturestamp.co.za]  
**Sent:** 11 January 2016 16:09  
**To:** 'HESTER'; 'amafaddps'  
**Subject:** FW: Kopleegte pivots

Dear Annie and Hester

Please see email below from centre pivot irrigation suppliers confirming that none of the pivot wheels would intersect the identified heritage sites and their buffers.

I look forward to receiving your final comments on the project.

Many thanks and kind regards  
Susan

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**From:** Eduard Boettiger [mailto:Eduard@irritechsa.co.za]  
**Sent:** 08 January 2016 12:41 PM  
**To:** Susan Carter-Brown - NatureStamp  
**Cc:** 'Riverside'  
**Subject:** RE: Kopleegte pivots

Hi Susan,

Please see attached.

I have made sure that none of the wheel tracks of the pivots intersect with the heritage sites. Some come close, but will not intersect directly.

Let me know if you need anything else.

As a matter of interest, when is this study likely to be complete and when can this project most likely go ahead?

**Kind Regards**

**Edu Boettiger B.Sc Mech Eng.**  
**Design/Sales Engineer**  
**Cell: +27 82 885 5221**  
**Office: +27 (0)33 342 3177**  
**Fax: +27 86 669 0857**  
**343 Boom Street, Pietermaritzburg 3201**  
**Website: [www.irritechsa.co.za](http://www.irritechsa.co.za)**



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**From:** Susan Carter-Brown - NatureStamp [mailto:susan@naturestamp.co.za]  
**Sent:** 08 January 2016 10:48 AM  
**To:** Eduard Boettiger <Eduard@irritechsa.co.za>  
**Cc:** 'Riverside' <riverside@bergmail.co.za>  
**Subject:** RE: Kopleegte pivots

Hi Edu

Great – see shapefiles attached.

Sue

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**From:** Eduard Boettiger [<mailto:Eduard@irritechsa.co.za>]  
**Sent:** 08 January 2016 10:08 AM  
**To:** Susan Carter-Brown - NatureStamp  
**Cc:** 'Riverside'  
**Subject:** RE: Kopleegte pivots

Hi Susan,

If you send it through to me shortly I should be able to get it back to you today.

**Kind Regards**

**Edu Boettiger B.Sc Mech Eng.**

**Design/Sales Engineer**

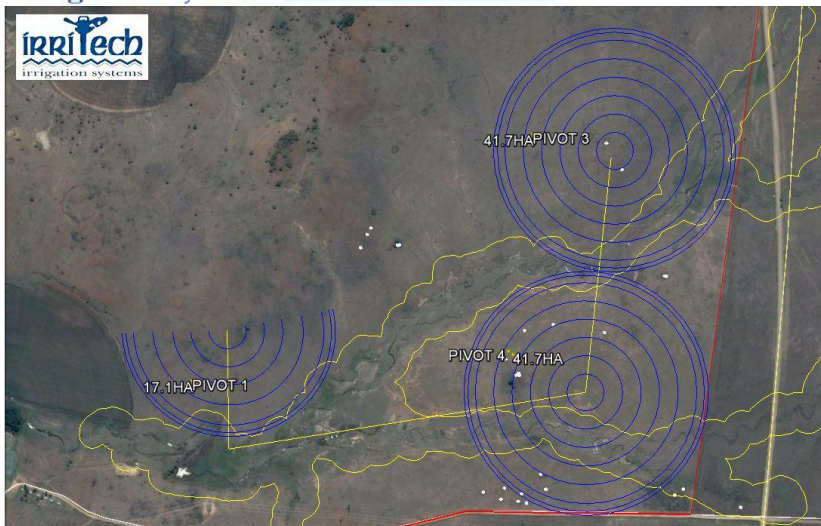
**Cell: +27 82 885 5221**

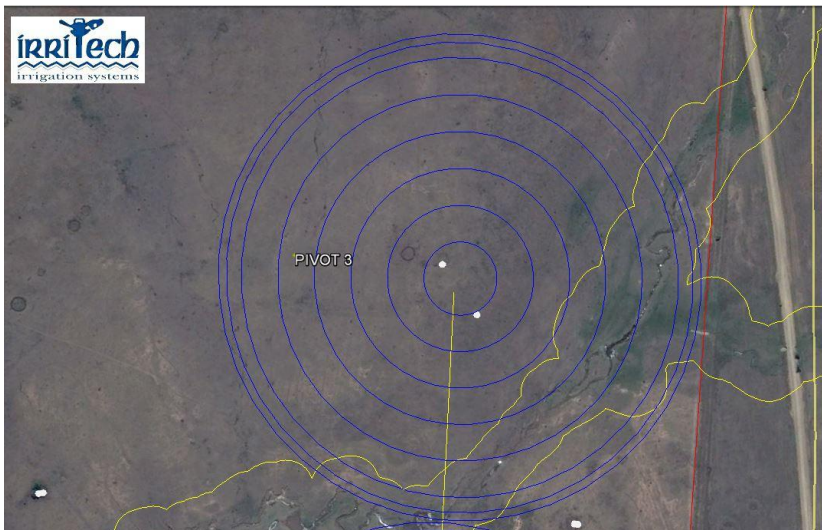
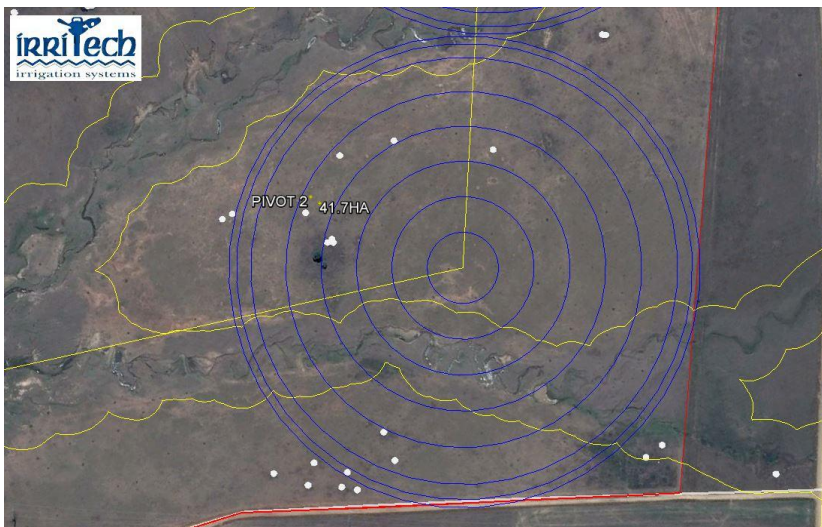
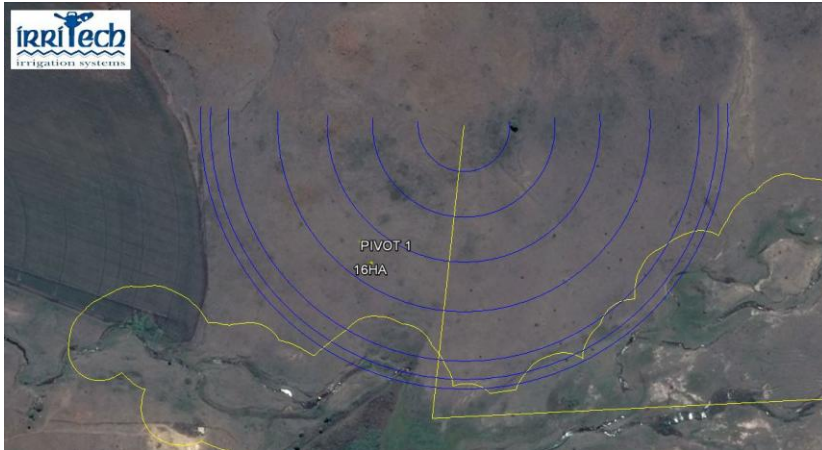
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**From:** Susan Carter-Brown - NatureStamp [<mailto:susan@naturestamp.co.za>]  
**Sent:** 08 January 2016 09:35 AM  
**To:** Eduard Boettiger <[Eduard@irritechsa.co.za](mailto:Eduard@irritechsa.co.za)>  
**Cc:** 'Riverside' <[riverside@bergmail.co.za](mailto:riverside@bergmail.co.za)>  
**Subject:** RE: Kopleegte pivots

Hi Edu

Thanks – I will send through the heritage GIS file. Yes, the sites have changed from last time... The heritage specialists(s) are giving us a real run-around! : /

If you could please get onto this early next week; we would be most appreciative!

Kind regards  
Susan

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**From:** Eduard Boettiger [<mailto:Eduard@irritechsa.co.za>]  
**Sent:** 05 January 2016 11:08 AM  
**To:** Susan Carter-Brown - NatureStamp  
**Cc:** 'Riverside'  
**Subject:** RE: Kopleegte pivots

Hi Susan,

The heritage positions seem to have changed again from the second set that you sent. If you can send me the GIS file, I can load them and then send a close up image of each pivot so that you can check the proximity of each of the wheel tracks to the heritage sites. (See attached example with old heritage sites)

If you can send the files through to me today I can do it today. I am out of the office tomorrow and Thursday, and will therefore only be able to get to this on Friday if I can't get the files today.

Thanks.

**Kind Regards**

**Edu Boettiger B.Sc Mech Eng.**

**Design/Sales Engineer**  
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**Office: +27 (0)33 342 3177**  
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**343 Boom Street, Pietermaritzburg 3201**  
**Website: [www.irritechsa.co.za](http://www.irritechsa.co.za)**



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**From:** Susan Carter-Brown - NatureStamp [<mailto:susan@naturestamp.co.za>]  
**Sent:** 05 January 2016 10:15 AM  
**To:** Eduard Boettiger <[Eduard@irritechsa.co.za](mailto:Eduard@irritechsa.co.za)>  
**Cc:** 'Riverside' <[riverside@bergmail.co.za](mailto:riverside@bergmail.co.za)>  
**Subject:** Kopleegte pivots  
**Importance:** High

Hi Edu



As per the attached configuration, **please could you advise if any of the pivot wheel tracks will be going through heritage sites; and if so, please indicate where.**  
See page 19 of the attached report for the geographical co-ords.  
Alternatively, we can send you the GIS shapefile of the heritage sites if preferable?

**Are you able to send an image / file showing the pivot tracks?**

It is critical that I please get this information ASAP.

Many thanks and kind regards  
Susan

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