



Enquiries: Bernadet Pawandiwa
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CaseID: 12625

Date: Thursday November 29, 2018

Page No: 1

Interim Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the KwaZulu-Natal Heritage Act (Act 4 of 2008)

Attention: YASA CONSULTING PTY LTD

Physical address: 15 Chester Road

Parkwood

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Private Bag X1

Melrose Arch

2076

The Okhahlamba Local Municipality in KwaZulu Natal is proposing the upgrading of 1 500 rural homesteads through the construction of Low Income Houses within the area called Sandlwana situated approximately 26Km west of Bergville. The development may consist of the construction of additional houses and the upgrading of buildings at the existing homesteads.

The application and supporting documents including the Heritage Impact Assessment by Frans Prins and Paleontological Report by Gary Errol Trower has been considered by this office. The survey confirms that the general area is sensitive in terms of heritage legislation as numerous resources were noted including graves, rock art sites, living heritage sites and cultural landscape. These will need to be demarcated adequately to ensure that development does not impact on the sensitive zones.

Amafa concurs with the following recommendations by the heritage practitioner.

- a) A buffer zone of at least 50m must be respected around each and every rock art site situated within the project area.
- b) The local community must be consulted as part of a Phase Two Heritage Impact Assessment where development is planned within 100m from every rock art site with 'living heritage' values.
- c) Once the developer has identified the specific homesteads earmarked for upgrading then a Phase Two Heritage Impact Assessment must be initiated in order to assess the situation relative to graves near its near environs.
- d) It is also important to assess the cultural landscape aspects of the project area by conducting ethnographic surveys and indepth community interviews. It is proposed that the cultural landscape aspects should be assessed by a consultant with a strong background in anthropology.

A comprehensive heritage assessment incorporating the above requirements and the following is therefore required. This should cover social/public consultation on graves, living heritage and cultural landscape. The heritage practitioner should provide a detailed list of all graves and living heritage sites as required in terms of section 38 of the National Heritage Resources Act, Act 25, 1999. It is important that location of all the graves is clearly recorded as all graves are significant and protected by heritage legislation for their high social, cultural and religious value. This is important in order to ensure that graves and any other places to which oral history is attached are adequately protected before development commences. Evidence of consultation should be provided.

The Study should cover:



**Amafa AkwaZulu-Natali
Heritage KwaZulu-Natal
Erfenis KwaZulu-Natal**

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Email: amafaddps@amafapmb.co.za
Website: www.heritagekzn.co.za

SANDLWANA IN SITU HOUSING PROJECT OKHAHLAMBA LOCAL MUNICIPALITY

Our Ref: SAH/18/12625



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Page No: 2

- Identification of all heritage resources in the development area and its surroundings -50m
- Assessment of the impact of the development on such heritage
- Evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development
- Results of consultation with communities affected by the proposed development and other interested and affected parties regarding the impact of the development on heritage resources.
- Consideration of alternatives if heritage resources are affected by the development
- Mitigation plans for any adverse effects during and after completion of the project
- Table of all heritage resources identified .This should show Heritage resource type, description, location, significance and reasons for this rating.

Please download our list of Heritage Practitioners from our website www.heritagekzn.co.za.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Bernadet Pawandiwa
Senior Heritage Officer
Amafa/Heritage KwaZulu Natal

James van Vuuren
Deputy Director: Support Services, Technical
Amafa/Heritage KwaZulu Natal

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/508104>
(EDTEA, Ref: DC23/eng0058/2017)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for



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Page No: 3

proposed work.

2. If any heritage resources, including graves or human remains, are encountered they must be reported to Amafa immediately.
3. Amafa reserves the right to request additional information as required.



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