

A PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT: SOUTH AFRICAN POLICE SERVICES (SAPS) 10111 CALL CENTRE, ERVEN 530 AND 4162, CENTRAL HILL, PORT ELIZABETH, EASTERN CAPE PROVINCE

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Date: February 2009

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This Phase 1 Archaeological Impact Assessment has been amended in response to the review comment and recommendations given by the South Africa Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit, dated 09 February 2009. The SAHRA APM Unit could not make any archaeological heritage management decisions on the previous phase 1 archaeological impact assessment pertaining to the above-mentioned proposed development, as the above properties had not been directly inspected, and that possible archaeological occurrences that may have been visible on the surface of the above properties or detectable in the two trial pits may not have been observed and reported.

The area proposed for development was visited, entry gained and assessed on 11 February 2009. No archaeological materials / human remains were observed on the surface or in the trial pit areas.

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EXECUTIVE SUMMARY

The purpose of the study was to conduct a phase 1 archaeological heritage impact assessment on erven 530 and 4162, Central, Port Elizabeth, for the proposed development of a four-storey building for a South African Police Services (SAPS) 10111 Call Centre. The historical documents indicated that the area had historically (more than 100 years ago) been an Mfengu burial ground. The burial ground contained no headstones and no archaeological or human remains could be observed on the surface. However, the historical documents indicate that the area had been occupied by the Mfengu.

The area has been rated as having high local significance and it is likely that development could have a negative impact.

The following recommendations are proposed:

1. Consultation must take place with the probable descendents of the Mfengu people and related interested and affected parties.
2. A built environment heritage specialist should be appointed.
3. A phase 2 archaeological mitigation should take place to locate the burials within the proposed development area.
4. The burial ground area proposed for development be declared a 'no-go' zone and included into the proposed development.

BACKGROUND INFORMATION ON THE PROJECT

The report is part of a phase 1 archaeological heritage impact assessment for the proposed development of a four-storey building for the South African Police Services (SAPS) 10111 Call Centre. Neither re-zoning nor subdivision of the land would be required.

The Matrix...cc Urban Designers and Architects have been appointed as principal agents on behalf of the Department of Public Works.

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Terms of Reference

To conduct a phase 1 archaeological impact assessment of erven 530 and 4162, Richmond Hill, Port Elizabeth and to observe the possible presence of Mfengu burials in verification of the historical documents; to establish the range and importance of the exposed and *in situ* archaeological heritage features, the potential impact of the development, and to make recommendations to minimize possible damage to these sites.

Legislative Requirements

The proposed area for development has been historically documented as a Mfengu burial ground older than 100 years, therefore section 36(1,3,5) of the National Heritage Resources Act 25 of 1999 applies:

Burial grounds and graves

36. (1) where it is not the responsibility of any other authority, SAHRA must conserve and generally care for burial grounds and graves protected in terms of this section, and it may make such arrangements for their conservation as it sees fit.

(3) (a) No person may, without a permit issued by SAHRA or a provincial heritage resources authority—

(b) 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 (c) 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.

(5) SAHRA or a provincial heritage resources authority may not issue a permit for any activity under subsection (3)(b) unless it is satisfied that the applicant has, in accordance with regulations made by the responsible heritage resources authority— (a) made a concerted effort to contact and consult communities and individuals who by tradition have an interest in such grave or burial ground; and (b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.

BACKGROUND TO THE ARCHAEOLOGICAL HISTORY

Literature Review

Little is known about the archaeology of the immediate Central, Port Elizabeth area, mainly because no systematic research has been conducted owing to the already built-up and developed nature of the area. The oldest evidence of the early inhabitants of the Port Elizabeth area are large stone tools, for example, handaxes and cleavers, which can be found amongst river gravels and in old spring deposits in the region (Deacon 1970). These large stone tools are from a period called the Earlier Stone Age (ESA) and may date between 1 million and 250 000 years old. The large handaxes and cleavers were replaced by smaller stone tools of the Middle Stone Age (MSA) flake and blade industries. Evidence of MSA sites occur throughout the region and date between 200 000 and 30 000 years old. Fossil bone may in rare cases be associated with MSA occurrences (Deacon & Deacon 1999).

The majority of archaeological sites found within the Port Elizabeth area date from the past 10 000 years, referred to as the Later Stone Age (LSA) and are associated with the campsites of the San hunter-gatherers and Khoi pastoralists. These sites are difficult to find because they are in the open veld and often covered by vegetation and sand. The preservation of these sites is poor and therefore it is not always possible for them to be dated (Deacon & Deacon 1999).

Around 2000 years ago Khoikhoi pastoralists occupied the region and lived mainly in small settlements. They introduced domesticated animals (sheep, goat and cattle) and ceramic vessels into southern Africa. The most common archaeological sites along the nearby coast are shell middens (relatively large piles of marine shell) found usually concentrated opposite rocky coasts, but also along sandy beaches (usually referred to as 'Strandloper middens') (Rudner 1968). These were campsites of San hunter-gatherers, Khoikhoi herders and Khoisan communities who lived along the immediate coast (up to 5km) and collected marine foods. Mixed with the shell are other food remains, cultural material and often human remains can be

found in the middens. In general, middens date from the past 6 000 years. Large stone floors are also associated with middens which were probably used as cooking platforms (Binneman 2001, 2005).

Historical information concerning the Mfengu / Fingo in Port Elizabeth

In 1834, the Colonial government had made a grant to the London Missionary Society (LMS), large enough to provide for a 'burial ground' and an area of residence of 'Hottentots and other coloured people who were members of the [LMS Mission] Church. Thus the principle of locations for the indigenous people in Port Elizabeth was established (Baines 1989).

The Mfengu arrived in the Cape Colony following an agreement with Governor Benjamin D'Urban after the Sixth Frontier War (1834-1835), and entered the wage labour market in considerable numbers (Baines 1989). After 1835, the first black Africans seen by new arrivals at Algoa Bay and other eastern Cape ports were the Mfengu who had replaced the Khoi and coloureds as surf labourers, unloading ships and carrying cargo and passengers to shore on their shoulders (fig 1.). Several newspaper accounts described Mfengu labourers as a welcome improvement upon the 'Hottentots' whom they considered indolent, insolent and often under the influence of alcohol, and by 1842, J.C. Chase observed that Mfengu in Port Elizabeth were earning higher wages than the Khoi and coloureds for equivalent work (Moyer 1976).



Fig 1. Mfengu beach labourers unloading cargo and passengers (in Lorrimer 1971)

In 1837, the Mfengu populations of Uitenhage and Algoa Bay (later Port Elizabeth) grew rapidly as Lt. Governor Stockenstrom embarked on another large scale programme to distribute Mfengu throughout the 'old colony', mainly to reduce settlement tensions at Peddie. Stockenstrom ordered the removal of 2 000 Mfengu to the Tsitsikama District, those unwilling to settle there were

permitted to accept any employment offered to them in the interior of the colony, and by 1839 there was even a settlement of Mfengu in Cape Town (Moyer 1976).

By 1840, it was estimated that there were over 600 Mfengu resident at Port Elizabeth, a large percentage being surf labourers. Owing to the crucial importance of their job, they were considered economic elite amongst Eastern Cape Africans. Initially, there were four areas where the Mfengu resided in huts they had constructed: the beach near the harbour, on the hillside above the town centre known as Hymanskloof (today known as Russell Road), and in two villages, each fifteen minutes walk in opposite directions from the centre of town (Moyer 1976). The first-mentioned (and probably largest) settlement was the so-called 'Fingo Village' on the 'Hill' (figs. 2-3). The Esenhig Survey Map (1849) (fig. 4) shows two distinct clusters of huts situated on either side of the upper reaches of Hymanskloof (Russell Road) which might correspond to the approximate but distinct 'Hottentot Location' and 'Fingo Village' (Baines 1989). The present Russell Road was first known as Burial Kloof for on its upper right hand slope was the burial ground of the early settlers, but later it was named Hymanskloof after Mr. Hyman, leader of the Hyman Party, whose isolate dwelling at the lower end of old Main Street faced the kloof. A narrow footpath led up through it to Stranger's Location, where a great number of natives were housed in squalid huts and miserable shanties; but much of the land in the area belonged to the London Missionary Society (LMS) and was occupied by natives who used Hymanskloof as a short cut to and from the town below. On the site of the present Richmond Hill was the Fingo Location or Fingo City as the settlers styled it, with its poor dwellings (Redgrave 1947).



Fig 2. Beehive huts in a part of Strangers' Location on top of Russell Road with the London Missionary Society (LMS) Chapel in the background (in Redgrave 1947).



Fig 3. Mfengu sitting outside of their beehive huts. The photo had been taken during the mid-1800's where the Contemporary Jewish synagogue is situated in Edward Street, Central (on website *Port Elizabeth Daily Photo* www.)

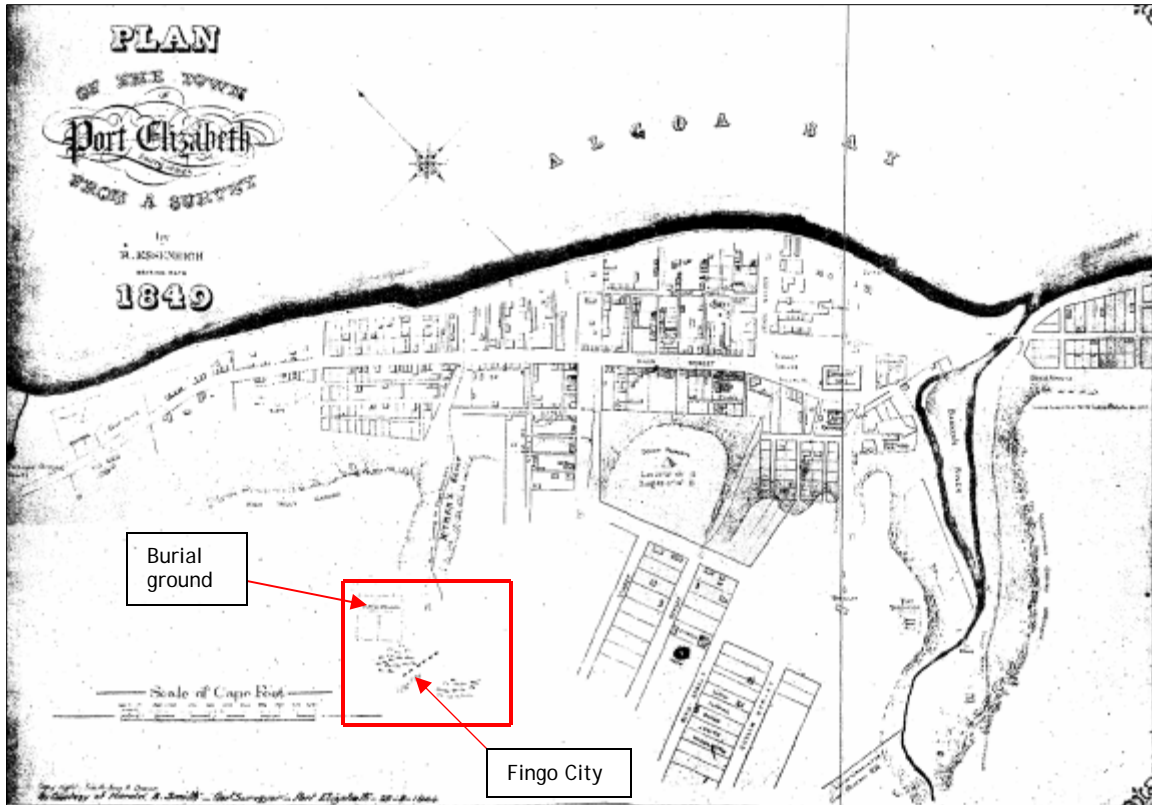


Fig 4. 1849 plan of the town of Port Elizabeth from a survey by R. Essenich (in Redgrave 1947). The red block highlights the Fingo City and burial ground area.

By the 1850's, whites began to regulate where Mfengu could reside. In some instances, they wanted the areas occupied by Mfengu for themselves, while in others, they simply wanted to remove the Mfengu as far as was possible (Moyer 1976). In 1855, Governor Sir George Grey made a grant for a Native Strangers' Location to the Port Elizabeth municipality, whereby the commissioners again attempted to resettle the inhabitants of the 'Fingo Village'. The grant for a Strangers' Location where Hottentots, Fingoes, Kaffirs and other strangers visiting Port Elizabeth may temporarily reside was proclaimed on 27 June 1855 (Baines 1989). As the town grew, many Mfengu were compelled to remove to the area to the northwest of town near the Swartkops River known as the 'Flats' (Moyer 1976).

By the 1960's the interest of white ratepayers and property developers had also come to be more strongly represented on Port Elizabeth's town council. A conflict of interests was to develop with regard to the residence of Africans in the town. The growing propertied class sought to exercise pressure through the town council for the regulation and control of informal African settlements and locations. They lobbied periodically for the removal of Africans from the path of the westward expansion of the middle-class suburbs. The 1865 census figures reflect the fairly rapid growth of the African population in Port Elizabeth's main locations. This prompted frequent demands for the removal of

Strangers' Location which was regarded by the white population as an eyesore and a health threat already by the 1960's (Baines 1989).

In 1877, a municipal location was established at Cooper's Kloof (off the present Albany Road) to provide further accommodation for native strangers and to avoid inconvenient and unwholesome overcrowding existing at the present location. Wood and iron structures were erected instead of the beehive huts common in Strangers' Location (Baines 1989).

In 1881, a 'faction fight' sparked renewed attempts had been made to relocate the inhabitants of Strangers' Location. The decision to establish the Reservoir Location (in the vicinity of the present day Mount Road) was made on the understanding that Strangers' Location would be removed. The municipality faced the daunting prospect of having to compensate church and school site holders, which meant that the costs of expropriation would have to be borne by the ratepayers. Not only were the inhabitants of Strangers' Location allowed to remain, but all those who had been resident in the Reservoir Location for at least 3 years prior to their being moved were rewarded freehold title (Baines 1989).

In 1891, pressure was again brought to bear on the town council by property developers and ratepayers to remove the existing municipal locations and open up the land in order to develop white suburbs. In June 1896, an agreement was made by the town council and the residents of Strangers' Location and Cooper's Kloof for the latter's removal to the planned Race Course Location (near Fairview). The move was pre-empted because the militia authorities took possession of a portion of the site at the outbreak of the Second Anglo-Boer War in 1899. After the war the race course site was rejected for the resettlement of the African population (Baines 1989).

In April 1901, a case of bubonic plague in Gubb's Location (present day Mill Park) aroused fears amongst whites that the locations were breeding grounds for the disease. The subsequent spread of the disease appeared to vindicate the popular view that the problem could be eliminated by the removal of the locations. In terms of Section 15 of the Public Health Act 23 of 1897, municipalities were authorized to remove Africans forcibly from infected premises, if necessary.

By September 1902, over 600 dwellings, situated mainly in Strangers' Location, had been condemned by the Plague Board as unfit for human habitation and were burned to the ground. In a matter of months the Plague Board had virtually accomplished what the Port Elizabeth town council had been attempting to achieve for the past forty years: to force many Africans resident in the inner locations out of town (Baines).

By 1 June 1903, the deadline for the Municipality's general eviction notice, Strangers' Location, which was situated on prime real estate, had been cleared of its residents. A number of these residents moved to New Brighton

before the expiration of the deadline. New Brighton was to supplant all existing municipal and private locations within the city. Most residents, however, remained until evicted and all the huts in Strangers' Location were cleared and razed to the ground during June. Cooper's Kloof experienced a similar fate three months later (Baines).

The only information that could be found on the burial ground on Richmond Hill is documented in a compilation of cemeteries and burial grounds recorded along the coast from the crossroads on the N2 at Nanaga in the East to Kareedouw in the West, in *Monumental Inscriptions: Coastal Cemeteries: Nanaga to Kareedouw*. Accordingly, the burial ground for the Fingo people closed for burials in August 1881, describing it as a piece of ground in Richmond Hill, Central, a little to the west of St. Phillip's Church and is today a grassed park. The Fingo location had been situated between this cemetery and the Russell Road Cemetery.

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DESCRIPTION OF THE PROPERTY

Details of the Area Surveyed

Location Data

Erven 530 and 4162, Richmond Hill, Central, Port Elizabeth, Nelson Mandela Metropolitan Municipality, Eastern Cape.

Location Map

1:50 000 3325CD, 3325DD and 3425BA Port Elizabeth (Map 1)

A GPS reading was taken using a Garmin Plus II at 33°57'26.66"S;
25°36'30.02"E.

Methodology

The survey was conducted by two people on foot. The area proposed for development is a small fenced-in area that used to be part of the greater Richmond Park (Figs. 5-6), but which has now been separated by a cemented footpath (Fig. 7). The area is situated adjacent to the old Erica Girls School, historical monument and provincial heritage site, and directly across the road from the St. Phillip's Church established in 1883 (Fig. 8). The proposed area for development is covered by kikuyu grass overlying a thin layer of topsoil (Figs. 9-10).

Four trial pits were previously dug and refilled by Bopite Engineering Geologists cc, excavated to depths of between 1.35m and 3.25m below surface. Only two of these trial pits are visible within the demarcated burial ground area. These two trial pits were investigated for possible archaeological material or evidence pertaining to the presence of burials. No archaeological material or evidence for the presence of burials was observed (Figs. 11-14).

No burials were evident as there were no headstones to indicate the graves. No archaeological and human remains could be observed.

DESCRIPTION OF SITES, ARTEFACTS, FAUNAL, BOTANICAL OR OTHER FINDS AND FEATURES

No sites were located and no artefacts or other significant finds were documented within the area proposed for development.



Fig. 5. View of Richmond Park.



Fig. 6. View of Richmond Park standing in the proposed area for development.



Fig. 7. View of the cement path and the fence separating the development (on the left) from Richmond Park (on the right). The two trial pits are visible within the fenced area.



Fig. 8. The surveyed area proposed for area proposed for development standing in front of St. Phillip's Church.



Fig. 9. Kikuyu grass covering the area proposed for development.



Fig. 10. Kikuyu grass covering the area proposed for development.



Fig. 11. One of the trial pits dug within the area proposed for development.



Fig. 12. A closer view of the trial pit.



Fig. 13. The second trial pit dug within the area proposed for development.



Fig. 14. A closer view of the trial pit.

CLEAR DESCRIPTION OF BURIAL GROUNDS AND GRAVES

The burial ground for the Mfengu community closed for burials in August 1881, therefore making the burial ground older than 127 years. It is a large piece of ground in Richmond Hill, Central, slightly to the west of St. Phillip's Church and is today a grassed park. The area proposed for development does not include the demarcated park area, and includes only a small fenced in area next to the Old Erica school. The graves cannot be seen on the surface.

The proposed area for development has been historically documented as a Mfengu burial ground older than 100 years, therefore section 36(1,3,5) of the National Heritage Resources Act 25 of 1999 applies:

Burial grounds and graves

36. (1) Where it is not the responsibility of any other authority, SAHRA must

conserve and generally care for burial grounds and graves protected in terms of this section, and it may make such arrangements for their conservation as it sees fit.

(3) (a) No person may, without a permit issued by SAHRA or a provincial heritage resources authority—

(b) 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

(c) 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.

(5) SAHRA or a provincial heritage resources authority may not issue a permit for any activity under subsection (3)(b) unless it is satisfied that the applicant has, in accordance with regulations made by the responsible heritage resources authority—

(a) made a concerted effort to contact and consult communities and individuals who by tradition have an interest in such grave or burial ground; and

(b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.

The following discusses the guidelines for the procedure for the permit application process public participation procedure to follow when dealing with proposed development on burial grounds and graves:

Permit Application:

SAHRA may issue a permit to disturb a burial that is known to be a grave of conflict or older than 60 years, or to use, at a burial ground, equipment for excavation or the detection or recovery of metals. (Permit applications must be made on the official form Application for permit: Burial Grounds and Graves available from SAHRA or provincial heritage resources authorities). Before doing so, however, SAHRA must be satisfied that the applicant:

- has made satisfactory arrangements for the exhumation and re-interment of the contents of such a grave at the cost of the applicant,
- has made a concerted effort to contact and consult communities and individuals who by tradition in such a grave and,
- has reached agreement with these communities and individuals regarding the future of such a grave or burial ground.

The Procedure for Consultation is as follows:

The regulations in the schedule describe the procedure of consultation regarding known burial grounds and graves. These apply to any one who intends to apply for a permit to destroy, damage, alter, removes from its original position or otherwise disturb any grave or burial ground older than 60 years that is situated outside a formal cemetery administered by a local authority. The applicant must make a concerted effort to identify the descendents and family members of the persons buried in and/or any other person by community tradition concerned with such a grave or burial ground by -

- archival and documentary research regarding the origin of the grave or burial ground;
- direct consultation with the local community organisations and/or members;
- the erection for at least 60 days of a notice at the grave or burial ground, displaying, in all official languages of the province concerned, information about the proposals

- affecting the site, the telephone number and address at which the applicant can be contacted by any interested party and the date by which contact must be made, which must be at least 7 days after the end of the period of erection of the notice; and
- advertising in the local press.

The applicant must keep records of the actions undertaken, including the names and contact details of all persons and organisation contacted and their response, and a copy of such records must be submitted to the provincial heritage resources authority with the application.

Unless otherwise agreed by the interested parties, the applicant is responsible for the cost of any remedial action require.

If the consultation fails to result in agreement, the applicant must submit records of the consultation and the comments of all interested parties as part of the application to the provincial heritage resources authority.

STATEMENT OF SIGNIFICANCE

The surveyed area proposed for development is historically significant as it is forms part of Port Elizabeth's early settlement history. The Mfengu burial ground is itself significant as it inculcates the past identities of the Mfengu people who occupied the Richmond Hill area.

FIELD RATING

The area is rated as having high local significance and it is likely that the proposed development would have a negative impact.

RECOMMENDATIONS

The following recommendations are proposed:

1. Consultation (in accordance with the legislation and SAHRA guidelines) must take place with the probable descendents of the Mfengu people who historically occupied the Richmond Hill, Central area, and other such related interested and affected parties. Until this procedure has been finalized no archaeological mitigation or preparation for development may take place.
2. A built environment heritage specialist should be appointed to assess the surrounding buildings and residential houses older than 60 years and determine the impact of the development on the structures (e.g. visual, aesthetic etc).
3. Once the consultation and negotiation process has been concluded and permission from the Mfengu people and related interested and affected parties has been granted, the following recommendations must be considered:

- a. A phase 2 archaeological mitigation should take place to locate the burials within the proposed development area. The mitigation would include a series of test pits to establish the extent and depth of the burials.
 - b. Once the final decision from the heritage authorities on the phase 2 archaeological heritage impact assessment has been made, it would be recommended that a professional archaeologist monitor the bulk earthworks for the development, or otherwise stipulated by the heritage authorities.
 - c. If in the case of burials being found, a repatriation specialist/s should be consulted to administer the exhumation, removal and reburial of the human remains.
4. The burial ground area proposed for development be declared a 'no-go' zone or be included into the proposed development as a memorial area /area of remembrance.

CONCLUSION

Research has confirmed the important historical archaeological significance of the area proposed for development. Development must be carefully planned to protect and conserve the heritage value of the burial grounds owing to the sensitivity of the site and the issues of community consultation.

GENERAL REMARKS AND CONDITIONS

Note: This report is a phase 1 archaeological impact assessment/investigation only and does not include or exempt other required heritage impact assessments (see below).

The National Heritage Resources Act No. 25 of 1999, section 35, requires a full Heritage Impact Assessment (HIA) in order that all heritage resources, that is, all places or objects of aesthetics, architectural, historic, scientific, social, spiritual, linguistic or technological value or significance are protected. Thus any assessment should make provision for the protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60 years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects.

It must be emphasized that the conclusions and recommendations expressed in this archaeological heritage sensitivity investigation are based on the visibility of archaeological sites/features and may not, therefore, reflect the true state of affairs. Many sites/features may be covered by soil and vegetation and will only be located once this has been removed. In the event of such finds being uncovered, (during any phase of construction work), archaeologists must be informed immediately so that they can investigate the importance of the sites and excavate or collect material before it is destroyed. The *onus* is on the developer to ensure that this agreement is honoured in accordance with the National Heritage Resources Act No. 25 of 1999.

It must also be clear that Archaeological Specialist Reports (AIA's) will be assessed by the relevant heritage resources authority. The final decision rests with the heritage resources authority, which should give a permit or a formal letter of permission for the destruction of any cultural sites.

APPENDIX A: IDENTIFICATION OF ARCHAEOLOGICAL FEATURES AND MATERIAL FROM COASTAL AND INLAND AREAS: guidelines and procedures for developers

1. Identification of Historical Iron Age archaeological features and material

- Upper and lower grindstones, broken or complete. Upper grindstone/rubber will be pitted.
- Circular hollows -sunken soil, would indicate storage pits and often associated with grindstones.
- Ash heaps, called middens with cultural remains and food waste such as bone.
- Khaki green soils would indicate kraal areas.
- Baked clay/soil blocks with or without pole impressions marks indicate hut structures.
- Decorated and undecorated pot sherds.
- Iron slag and/or blowpipes indicate iron working.
- Human remains may also be associated with khaki green soils.
- Metal objects and ornaments.

2. Shell middens

Shell middens can be defined as an accumulation of marine shell deposited by human agents rather than the result of marine activity. The shells are concentrated in a specific locality above the high-water mark and frequently contain stone tools, pottery, bone and occasionally also human remains. Shell middens may be of various sizes and depths, but an accumulation which exceeds 1 m² in extent, should be reported to an archaeologist.

3. Human skeletal material

Human remains, whether the complete remains of an individual buried during the past, or scattered human remains resulting from disturbance of the grave, should be reported. In general the remains are buried in a flexed position on their sides, but are also found buried in a sitting position with a flat stone capping or in ceramic pots. Developers are requested to be on alert for these features and remains.

4. Fossil bone

Fossil bones may be found embedded in deposits at the sites. Any concentrations of bones, whether fossilized or not, should be reported.

5. Stone artefacts

These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been disturbed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately and archaeologist notified.

6. Stone features and platforms

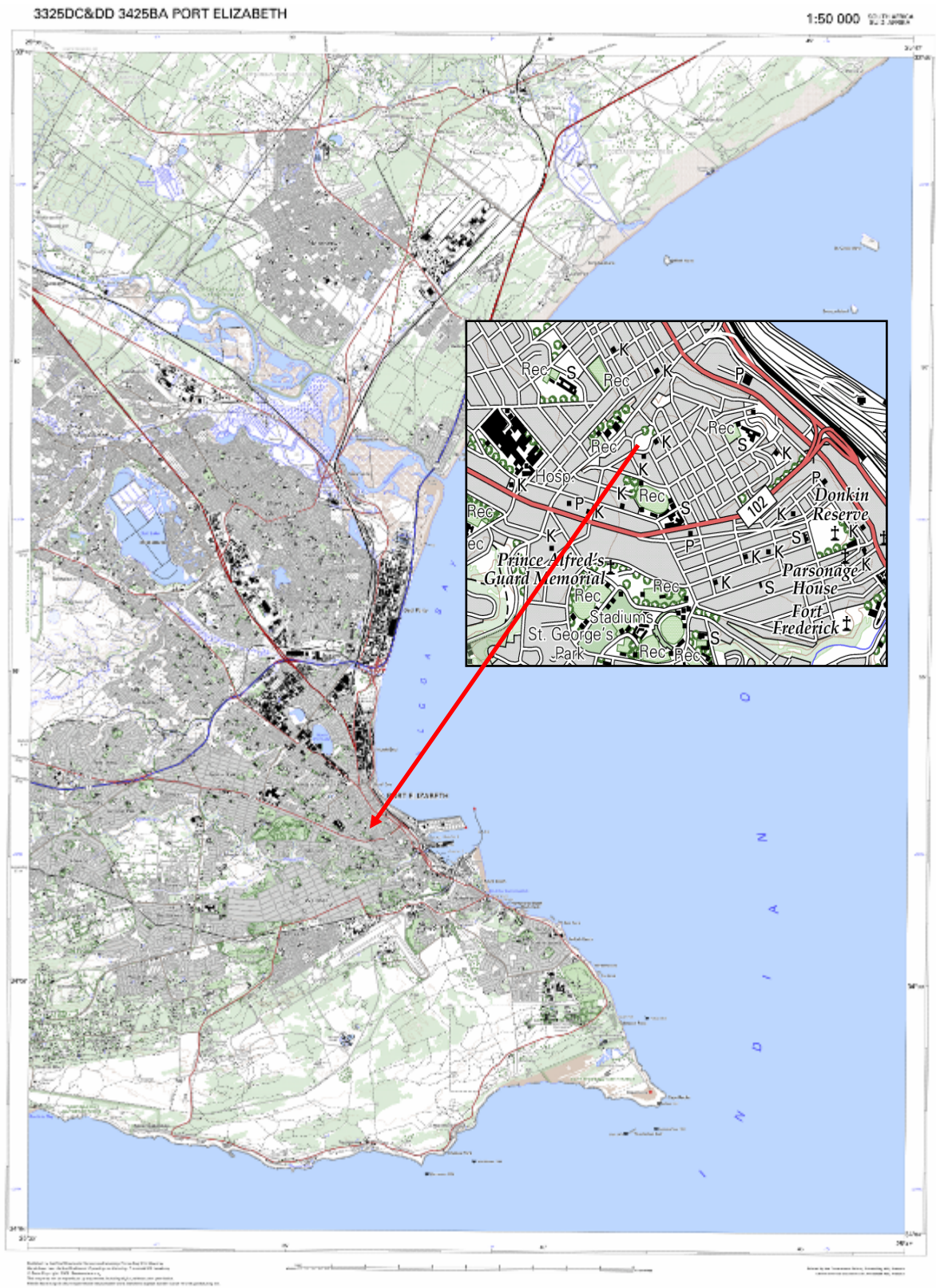
These occur in different forms and sizes, but easily identifiable. The most common are an accumulation of roughly circular fire cracked stones tightly spaced and filled in with charcoal and marine shell. They are usually 1-2metres in diameter and may represent cooking platforms for shell fish. Others may resemble circular single row cobble stone markers. These occur in different sizes and may be the remains of wind breaks or cooking shelters.

7. Large stone cairns

The most common cairns consist of large piles of stones of different sizes and heights are known as *isisivane*. They are usually near river and mountain crossings. Their purpose and meaning is not fully understood, however, some are thought to represent burial cairns while others may have symbolic value.

8. Historical artefacts or features

These are easy to identify and include foundations of buildings or other construction features and items from domestic and military activities.



Map 1. 1:50 000 map indicating the location of the proposed development and surrounds.



Map 2: Red square indicates area proposed for development.