

**A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF
A PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) FOR THE PROPOSED
KWANONKUBELA ALEXANDRIA COMMUNITY HEALTH CENTRE ON ERF 623,
ALEXANDRIA, NDLAMBE LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE.**

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A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF A PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) FOR THE PROPOSED KWANONKQUBELA ALEXANDRIA COMMUNITY HEALTH CENTRE ON ERF 623, ALEXANDRIA, NDLAMBE LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE.

NOTE: The archaeological impact assessment survey was conducted as a requirement of the National Heritage Resources Act 1999, Section 38 (1)(c)(i):

38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as –

(c) any development or other activity which will change the character of the site –

(i) exceeding 5000 m² in extent, or

This report follows the minimum standard guidelines required by the South African Heritage Resources Agency (SAHRA) and the Eastern Cape Provincial Heritage Resources Agency (ECPHRA) for compiling a Letter of Recommendation for the Exemption of a Full Phase 1 Archaeological Impact Assessment (AIA).

1. EXECUTIVE SUMMARY

1.1. The type of development:

Kwanonkqubela / Alexandria Community Health Centre, associated infrastructure and accommodation to be situated on Erf 623, Alexandria, Ndlambe Local Municipality, Eastern Cape Province. The proposed development area will be approximately 2 978.52 m² in extent.

Kwa-Nonkqubela and Wentzel Park Clinics are situated 65km to the next referral hospital which is Port Alfred Hospital. Alexandria area is very vast, rural and a farm area that borders on Nanaga area. The intention is to integrate the two facilities (Kwa-Nonkqubela and Wentzel Park Clinics) to one facility, an Alexandria Community Health Centre, with a component of first level service (a clinic) and the Community Health Centre providing a comprehensive Community Health Centre Primary Health Care Core Package. It was established that the CHC will be a large structure due to the requirements of the facility.

The land is owned by the Local Municipality and Council Resolution has been requested for the construction of the Community Health Centre.

All services (water, electricity, sewerage) have been identified within and around the project site and are deemed suitable for the proposed project.

A traffic study is planned to be completed before the start of construction to confirm accessibility. The new project site is within 100 m of the existing Kwanokqubela Clinic and on the main access road to the Township.

The suitability of the two proposed sites was evaluated through desktop studies, also according to the special needs of the large Community Health Centre and existing standard plans, together with other town planning requirements like parking, coverage and building lines. No adverse impact on adjacent properties has been identified.

Site 1 was deemed unsuitable due to the steep slope, corner position and the fact that it is not large enough to accommodate the building with all of the above town plan requirements.

Site 2 has been identified as the preferred site.

1.2. Developer:

Ndlambe Local Municipality

1.3. Consultant:

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1.4. Terms of reference

The purpose of the study was to conduct a phase 1 archaeological impact assessment (AIA) for the proposed Kwanonkqubela Alexandria Community Health Centre on Erf 623, Alexandria, Ndlambe Local Municipality, Eastern Cape Province.

The survey was conducted to:

- establish the range and importance of the exposed and *in situ* archaeological heritage materials remains, sites, and features;
- establish the potential impact of the development; and
- make recommendations to minimize possible damage to the archaeological heritage.

1.5. Brief Summary of Findings

The proposed area for development, Erf 623, has been heavily disturbed over time and is covered in dense grass vegetation and thicket that obscured archaeological visibility, with a few surface exposed areas occurring within the site. The degraded remains of structures occurred on the southern half of the site. No archaeological heritage remains, features, or sites were documented within the proposed area for the development.

2. DESCRIPTION OF THE PROPERTY

2.1. Location data

The proposed development site is situated east of Alexandria's town centre on the R72 provincial road. The site is bordered by the R72 provincial immediately north and the residential areas of Kwanonkqubela Township in the west, south, and east. The site is situated outside of the generally considered 5 km archaeological sensitive coastal zone. A stream runs diagonally through the site. The area has been heavily transformed over time and may have been used as cultivated land during the 1960's (1:50 000 topographic map, 1965 edition) and later excavations / diggings and walls are indicated on the 1:50 000 topographic map (1980 edition). The area is currently open space and the northern half of the area is being used by the local community as an area for housing dwellings during a traditional initiation ritual.

2.2. Map

1:50 000 topographic map: 3226BC & CD ALEXANDRIA (not included in report).

1:250 000 topographic map: 3325 GRAHAMSTOWN

TABLE 1: GPS CO-ORDINATES AND DESCRIPTIONS FOR THE PROPOSED KWANONKQUBELA ALEXANDRIA COMMUNITY HEALTH CENTRE ON ERF 623, ALEXANDRIA, NDLAMBE LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE.

REFERENCE	DESCRIPTION	CO-ORDINATES	HERITAGE GRADING
CHC1	General GPS point: Site 1 (site deemed unsuitable)	33°39'16.60"E; 26°25'19.70"S	NA
CHC2	General GPS point: Site 2 (Erf 623)	33°39'14.50"E; 26°25'04.40"S	NA



Figure 1. 1:250 000 topographic map 3326 GRAHAMSTOWN showing the location of the proposed Kwanonkqubela Alexandria Community Health Centre (red block).

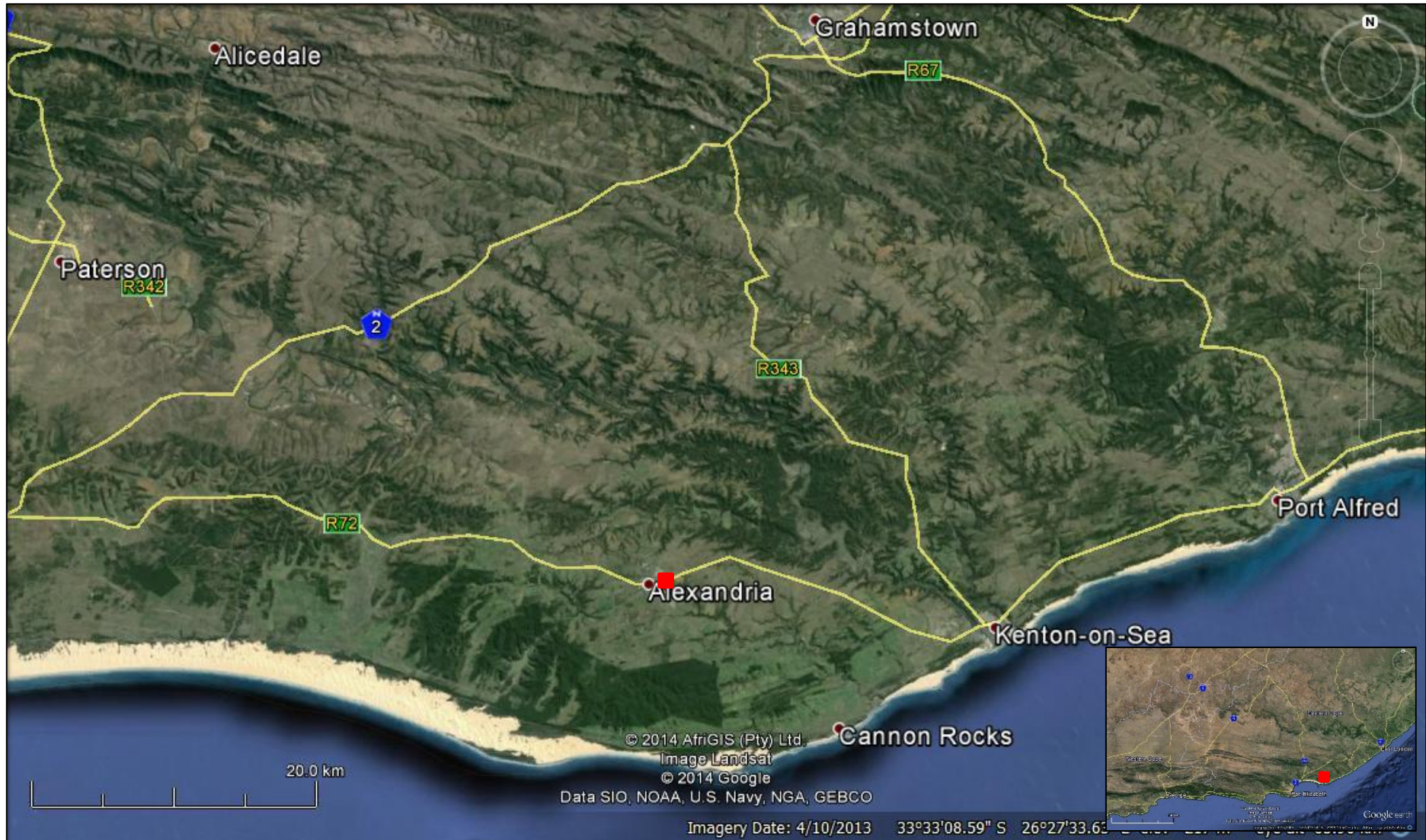


Figure 2. Aerial view showing the location of the proposed Kwanonkubela Alexandria Community Health Centre within proximity to towns in the wider region (red block).

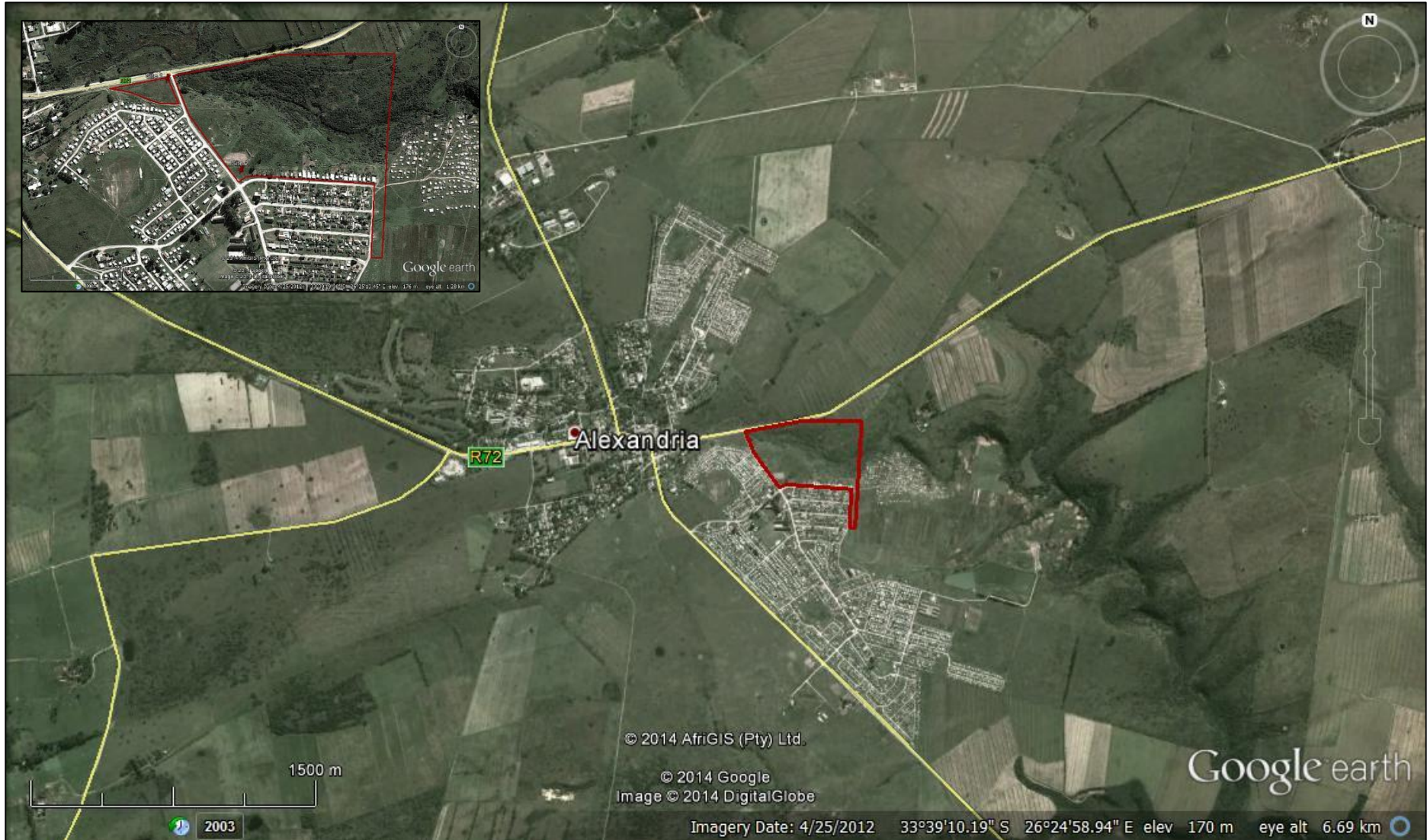


Figure 3. Aerial view showing the location of the proposed Kwanonkqubela Alexandria Community Health Centre in relation to Alexandria’s town centre.



Figure 4. Close-up aerial view showing the location of the proposed Kwanonkqubela Alexandria Community Health Centre, general GPS (red dots) points taken during the survey, and the area used by the local community for *Kwaluka* housing the amabhoma (demarcated yellow area).

3. ARCHAEOLOGICAL INVESTIGATION

3.1. Methodology

The archaeological investigation was carried out on foot by surveying the area proposed for the proposed Kwanonkqubela Alexandria Community Health Centre, approximately 5 000 m² in extent. The area situated north of the stream running through the site was not surveyed owing to the area currently being used by the local community for *Kwaluka* (AmaXhosa boys' initiation or 'going to the bush') for the traditional cultural ritual. Inevitably the area is covered in relatively dense bush and thicket vegetation and it is unlikely that archaeological material would have been visible at the surface. However, if the Eastern Cape Provincial Heritage Resources Agency (ECPHRA), who is the commenting authority on archaeological heritage in the province, deems it necessary to conduct a thorough investigation of the northern section of the proposed site, a site visit will be conducted once the period for the cultural tradition has been completed. An addendum of the results of the archaeological investigation will be provided to be added to the current report.

The proposed area was investigated for possible archaeological heritage remains, features, and sites. Photographs and GPS readings were taken using a Garmin Oregon 550 (Table 1). The GPS co-ordinates and demarcated area occupied by amabhoma, structures built by the boys and used for shelter during this stage of initiation (yellow area), have been plotted on Figure 4.

3.2. Results of the Archaeological Survey

Two areas were identified for the establishment of the community health centre, however, Site 1 has been deemed unsuitable for the proposed development due to the steep slope, corner position and the fact that it is not large enough to accommodate the building with all of the town plan requirements (Figures 5-6).

The general landscape of proposed area for development, Erf 623, is undulating slopes and uneven surfaces caused by previous surface disturbances. The site comprises dense grass and thicket vegetation that obscured archaeological visibility, with a few surface exposed areas occurring within the site (Figures 7-11). Contemporary development situated within the proposed site include a playground (Figure 12) located in the south western corner of the proposed site and a sewage pump station (Figure 13) located in the south eastern corner of the site.

The area south of the stream shows indication of heavily disturbed surface areas over most of the area (Figures 14-16). The area has been heavily transformed over time by the possible construction of dipping tanks during the 1960's (1:50 000 topographic map, 1965 edition) and later excavations / diggings and walls are indicated on the 1:50 000

topographic map (1980 edition). The degraded remains of structures occur within the southern half of the site.

The northern half of the site is currently, and according to members of the local community, over several years been used as an area for *Kwaluka*. This area therefore forms part of the contemporary living cultural landscape. Several amabhoma occur in the northern half of the proposed site (Figures 20-22).

No archaeological material was found within the proposed project area, however, it does not eliminate the possibility of archaeological artefacts in the area.



Figure 5. View of the area proposed for Site 1 facing north-west.



Figure 6. View of the area proposed for Site 1 facing north.



Figure 7. View of area proposed for Site 2 taken from taken from Site 1 facing east.



Figure 8. View of the general landscape of the area proposed for Site 2.



Figure 9. View of the general landscape of the area proposed for Site 2.



Figure 10. View of the general landscape facing east showing the residential area in the distance.



Figure 11. View of the north eastern section of the area proposed for Site 2 and surrounding informal housing of Kwanonkqubela Township in the east.



Figure 12. View of a recreation park area located in the south western section of the area proposed for Site 2.

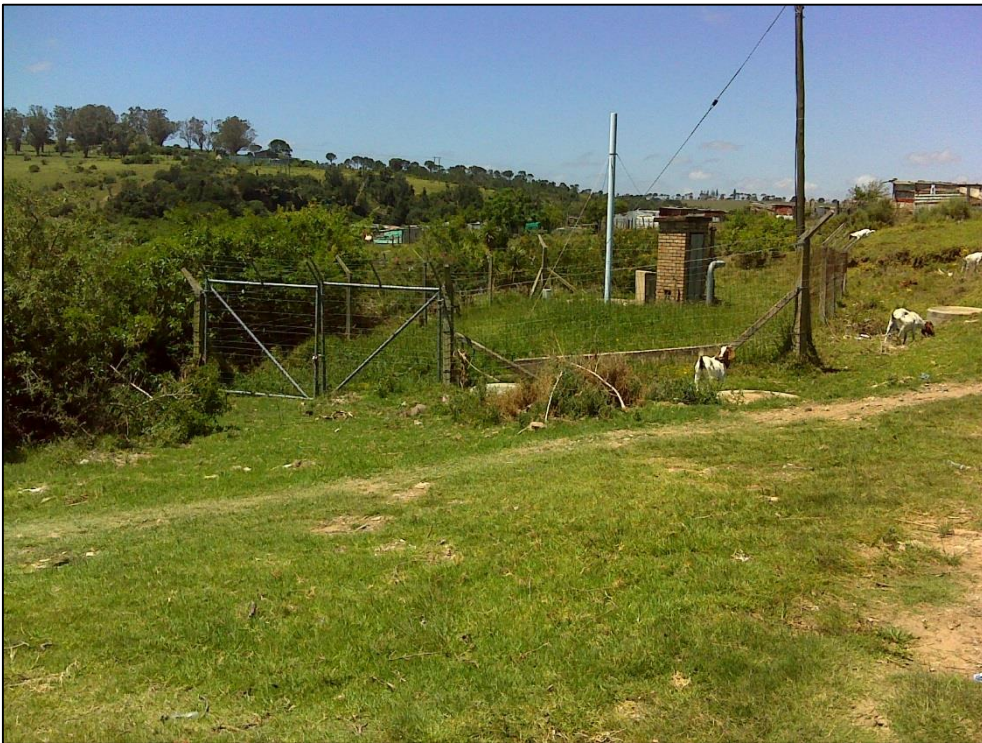


Figure 13. View of the pump station situated within the proposed development area for Site 2.



Figure 14. Manholes associated with the underground pipeline situated within the proposed development area for Site 2.



Figure 15. View of a heavily disturbed surface area.



Figure 16. Example of the remains of structures occurring within the proposed development area for Site 2.



Figure 17. Example of the remains of structures occurring within the proposed development area for Site 2.



Figure 18. Example of the remains of structures occurring within the proposed development area for Site 2.



Figure 19. Example of the remains of structures occurring within the proposed development area for Site 2.



Figure 20. View of the amabhoma (yellow circles) situated in the western section of the northern half of the proposed development area for Site 2.



Figure 21. View of the amabhoma (yellow circles) situated in the central section of the northern half of the proposed development area for Site 2.



Figure 22. View of the amabhoma situated in the eastern section of the northern half of the proposed development area for Site 2.

4. RELEVANT ARCHAEOLOGICAL IMPACT ASSESSMENTS

Very little systematic archaeological research has been conducted within the immediate and surrounding areas for the proposed project, therefore, Cultural Resource Management (CRM) Reports, such as archaeological and heritage impact assessments, assist in attempting to predict the archaeological and heritage resources that may be found within the proposed development areas. The following reports are considered relevant to the current project:

- Anderson, G. 2011. Heritage survey of the proposed pipeline from Alexandria to Cannon Rocks, Eastern Cape.
- Nel, J. 2008. Final Report – Heritage Resources Scoping Survey and Preliminary Assessment: Transnet Freight Line EIA, Eastern Cape and Northern Cape.
- Van Ryneveld, K. 2012. Phase 1 archaeological impact assessment: Refurbishment, operation and maintenance of the Port Alfred East Bank Dune – Well Water Supply Scheme, Port Alfred, Eastern Cape, South Africa.
- Van Schalkwyk, L. O. & Wahl, B. 2007. Heritage Impact Assessment of Gamma Grassridge Power Line Corridors and Substation, Eastern, Western and Northern Cape Provinces, South Africa.
- Van Schalkwyk, L. O. & Wahl, B. 2008. Heritage Impact Assessment of Ndlambe and Makana Borrow Pits, Greater Cacadu Region, Eastern Cape Province, South Africa.

- Webley, L. E. 2002. Proposed Kaboega Dam – Phase 1 Heritage Impact Assessment.
- Webley, L. E. 2003. Addo Elephant National Park: Upgrading of Existing Tourist Road Network and Construction of Southern Access Road near Colchester – Phase 1 Archaeological Impact Assessment.
- Webley, L. E. 2007a. A Phase 1 Archaeological Impact Assessment on the Construction of 50 KM of Loop Roads on the Farms Addo Heights (209), Lismore (208), Zoute Fontein (210), Nieu Jaars Kop (300) and Oliphants Plaat (214) within the Southern Section of the Addo Elephant National Park, Eastern Cape.
- Webley, L.E. 2007b. Archaeological and historical assessment of the proposed La Repose Resort.
- Webley, L. E. 2007c. Phase 1 Heritage Impact Assessment on Portions of Farms Boekenhout Fontein, Assegai Bush and Birchwood Park for the Establishment of Game Lodges and Resorts to be incorporated into the Greater Lalibela Nature Reserve, Eastern Cape.
- Webley, L.E. 2007d. Phase 1 Heritage Impact Assessment: Sand mining on the Farm Commando Valley 273 situated in the magisterial district of Alexandria, Eastern Cape.
- Webley, L.E.; Way-Jones, F.; de Klerk, B. & Cocks, M. 2002. Greater Addo Elephant National Park Cultural Mapping Pilot Project.

5. REFERENCES

National Heritage Resources Act 25 of 1999 (NHRA 25 of 1999)
 South African Heritage Resources Information System (SAHRIS) Database.
 CEN Integrated Environmental Management (IEM) Unit. Background information and maps provided.

6. LETTER OF RECOMMENDATION

It is recommended that the area proposed Kwanonkqubela Alexandria Community Health Centre on Erf 623, Alexandria, Ndlambe Local Municipality, Eastern Cape Province, is exempted from a full Phase 1 Archaeological Impact Assessment. The proposed area for development is of low archaeological cultural sensitivity. It is believed that it is unlikely that any archaeological heritage remains will be found on the property. The development may proceed as planned.

There were no archaeological artefacts located during the phase 1 archaeological impact assessment carried out. If any archaeological or heritage material were to be discovered it is very unlikely that it would be *in situ*. However, there is always a possibility that human remains or other archaeological and historical material may be uncovered during the development. Such material must be reported to the Eastern Cape Provincial Heritage Resources Agency (ECPHRA) (043 745 0888) or the Albany Museum (046 622 2312) if exposed.

Note: This letter of recommendation **only** exempts the proposed development from a full Phase 1 Archaeological Heritage Impact Assessment, but **not** for other heritage impact assessments.

It must also be clear that this letter of recommendation for exemption of a full Phase 1 archaeological heritage impact assessment 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.

The National Heritage Resources Act (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.

7. RECOMMENDATIONS

Although no archaeological heritage remains, features, and sites were encountered during the survey, the northern half of the proposed development area is a significant living cultural heritage landscape. The following recommendations should be considered before development proceeds:

1. The local community should be duly consulted during the public participation process with regards to the significance of the northern half of the proposed used as cultural landscape for the *Kwaluka* cultural tradition.
2. If concentrations of archaeological heritage material and human remains are uncovered during construction, all work must cease immediately and be reported to the Albany Museum (046 622 2312) and/or the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/excavation can be undertaken.
3. The environmental control officer (ECO) as well as the construction managers/foremen should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites.

8. GENERAL REMARKS AND CONDITIONS

It must be emphasised that this letter of recommendation for exemption of a full Phase 1 archaeological heritage impact assessment is based on the visibility of archaeological sites/material and may not, therefore, reflect the true state of affairs. Sites and material

may be covered by soil and vegetation and will only be located once this has been removed. In the unlikely 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 (see attached list of possible archaeological sites and material). The *onus* is on the developer to ensure that this agreement is honoured in accordance with the National Heritage Act No. 25 of 1999.

APPENDIX A: HERITAGE LEGISLATIVE REQUIREMENTS

Parts of sections 3(1)(2)(3), 34(1), 35(4), 36(3) and 38(1)(8) of the National Heritage Resources Act 25 of 1999 apply:

S3. National estate

3. (1) For the purposes of this Act, those heritage resources of South Africa which are of cultural significance or other special value for the present community and for future generations must be considered part of the national estate and fall within the sphere of operations of heritage resources authorities.

3. (2) Without limiting the generality of subsection (1), the national estate may include –

- (a) places, buildings, structures and equipment of cultural significance;
- (b) places to which oral traditions are attached or which are associated with living heritage;
- (c) historical settlements and townscapes;
- (d) landscapes and natural features of cultural significance;
- (e) geological sites of scientific or cultural importance;
- (f) archaeological and palaeontological sites;
- (g) graves and burial grounds, including –
 - (i) ancestral graves;
 - (ii) royal graves and graves of traditional leaders;
 - (iii) graves and victims of conflict;
 - (iv) graves of individuals designated by the Minister by notice in the Gazette;
 - (v) historical graves and cemeteries; and
 - (vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
- (h) sites of significance relating to the history of slavery in South Africa;
- (i) movable objects, including –
 - (i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological specimens;
 - (ii) objects to which oral traditions are attached or which are associated with living heritage;
 - (iii) ethnographic art and objects;
 - (iv) military objects;
 - (v) objects of decorative or fine art;
 - (vi) objects of scientific or technological interest; and
 - (vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act (Act No. 43 of 1996).

3. (3) Without limiting the generality of subsections (1) and (2), a place or object is to be considered part of the national estate if it has cultural significance or other special value because of – 25

- (a) its importance in the community, or pattern of South Africa's history;
- (b) its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- (c) its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- (d) its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- (e) its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- (f) its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- (g) its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa; and
- (i) sites of significance relating to the history of slavery in South Africa.

S34. Structures

34. (1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

S35. Archaeology, palaeontology and meteorites

35 (4) No person may, without a permit issued by the responsible heritage resources authority—

- (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.

S36. Burial grounds and graves

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

- (a) 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;
- (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.

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S38. Heritage resources management

38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as –

- (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- (b) the construction of a bridge or similar structure exceeding 50m in length;
- (c) any development or other activity which will change the character of the site –
- (i) exceeding 5000m² in extent, or
 - (ii) involving three or more erven or subdivisions thereof; or
 - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA, or a provincial resources authority;
- (d) the re-zoning of a site exceeding 10 000m² in extent; or
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must as the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

APPENDIX B: GRADING SYSTEM

The NHRA stipulates the assessment criteria and grading of archaeological sites. The following categories are distinguished in Section 7 of the Act and the South African Heritage Resources Agency:

- National: This site is suggested to be considered of Grade 1 significance and should be nominated as such. Heritage resources with qualities so exceptional that they are of special national significance.
- Provincial: This site is suggested to be considered of Grade II significance and should be nominated as such. Heritage resources which, although forming part of the national estate, can be considered to have special qualities which make them significant within the context of a province or a region
- Local: This site is suggested to be Grade IIIA significance. This site should be retained as a heritage register site (High significance) and so mitigation as part of the development process is not advised.
- Local: This site is suggested to be Grade IIIB significance. It could be mitigated and (part) retained as a heritage register site (High significance).
- 'General' Protection A (Field Rating IV A): This site should be mitigated before destruction (usually High/Medium significance).
- 'General' Protection B (Field Rating IV B): This site should be recorded before destruction (usually Medium significance).
- 'General Protection C (Field Rating IV C): This site has been sufficiently recorded (in the Phase 1). It requires no further recording before destruction (usually Low significance).

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

1. 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 and developers are requested to be on the alert for this.

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. Freshwater mussel middens

Freshwater mussels are found in the muddy banks of rivers and streams and were collected by people in the past as a food resource. Freshwater mussel shell middens are accumulations of mussel shell and are usually found close to rivers and streams. These shell middens frequently contain stone tools, pottery, bone, and occasionally 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.

4. Stone artefacts

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

5. Fossil bone

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

6. Large stone features

They come in different forms and sizes, but are easy to identify. The most common are roughly circular stone walls (mostly collapsed) and may represent stock enclosures, remains of wind breaks or cooking shelters. Others consist of large piles of stones of different sizes and heights and 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.

7. Historical artefacts or features

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