

HERITAGE SCREENER


CTS Reference Number:	CTS16_010	
Client:	Terreco Environmental and SKG Properties	
Date:	11 February 2016	
Title:	Bengal Heights Residential Development, East London	
Recommendation by CTS Heritage Specialists: (Type 2)		<p>(2) The heritage resources and the area proposed for development are only partially recorded - It is recommended that:</p> <ul style="list-style-type: none">- an AIA should be conducted with a focus on the possible presence of graves and stone terracing.- a Palaeo Chance Find Procedure should be included in the EMPs and regular inspections by a palaeontologist of newly-cut mudrock within the Middleton Formation be conducted.

Figure 1a. Satellite image with proposed development area indicated in the Eastern Cape province.

1. Proposed Development Summary

Terreco Environmental cc has been appointed as independent Environmental Assessment Practitioner (EAP) by the project proponent, SKG Properties, to prepare the Basic Environmental Impact Assessment (BAR) and Environmental Management Programme (EMPr) reports for the proposed Bengal Heights Commercial and Residential Development, off Bengal Road, Amalinda, East London. The proposed development will comprise of a 13.7 ha area.

2. Application References

Name of relevant heritage authority(s)	Eastern Cape Provincial Heritage Resources Authority (ECPHRA)
Name of decision making authority(s)	Department of Economic Development, Environmental Affairs and Tourism (DEDEAT)

3. Property Information

GPS Coordinates	S33°0'3.255"; E27°52'8.534"
Farm Name and Number	Farm 854
Local Municipality	Buffalo City
District Municipality	Amatole
Previous Magisterial District	East London
Province	Eastern Cape
Current Use	Vacant
Current Zoning	--
Total Extent	Approximately 13,7 ha

4. Nature of the Proposed Development

Surface area to be affected/destroyed	Approximately 13,7 ha
Depth of excavation (m)	--
Height of development (m)	--
Expected years of operation before decommission	NA

5. Category of Development

Triggers: Section 38(8) of the National Heritage Resources Act	X
Triggers: Section 38(1) of the National Heritage Resources Act	
1. Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length.	
2. Construction of a bridge or similar structure exceeding 50m in length.	
3. Any development or activity that will change the character of a site-	
a) exceeding 5 000m ² in extent	X
b) involving three or more existing erven or subdivisions thereof	
c) involving three or more erven or divisions thereof which have been consolidated within the past five years	
4. Rezoning of a site exceeding 10 000m ²	
5. Other (state):	

6. Additional Infrastructure Required for this Development

NA

7. Mapping - Please see Appendices 3 and 4 for legend keys and methodology.

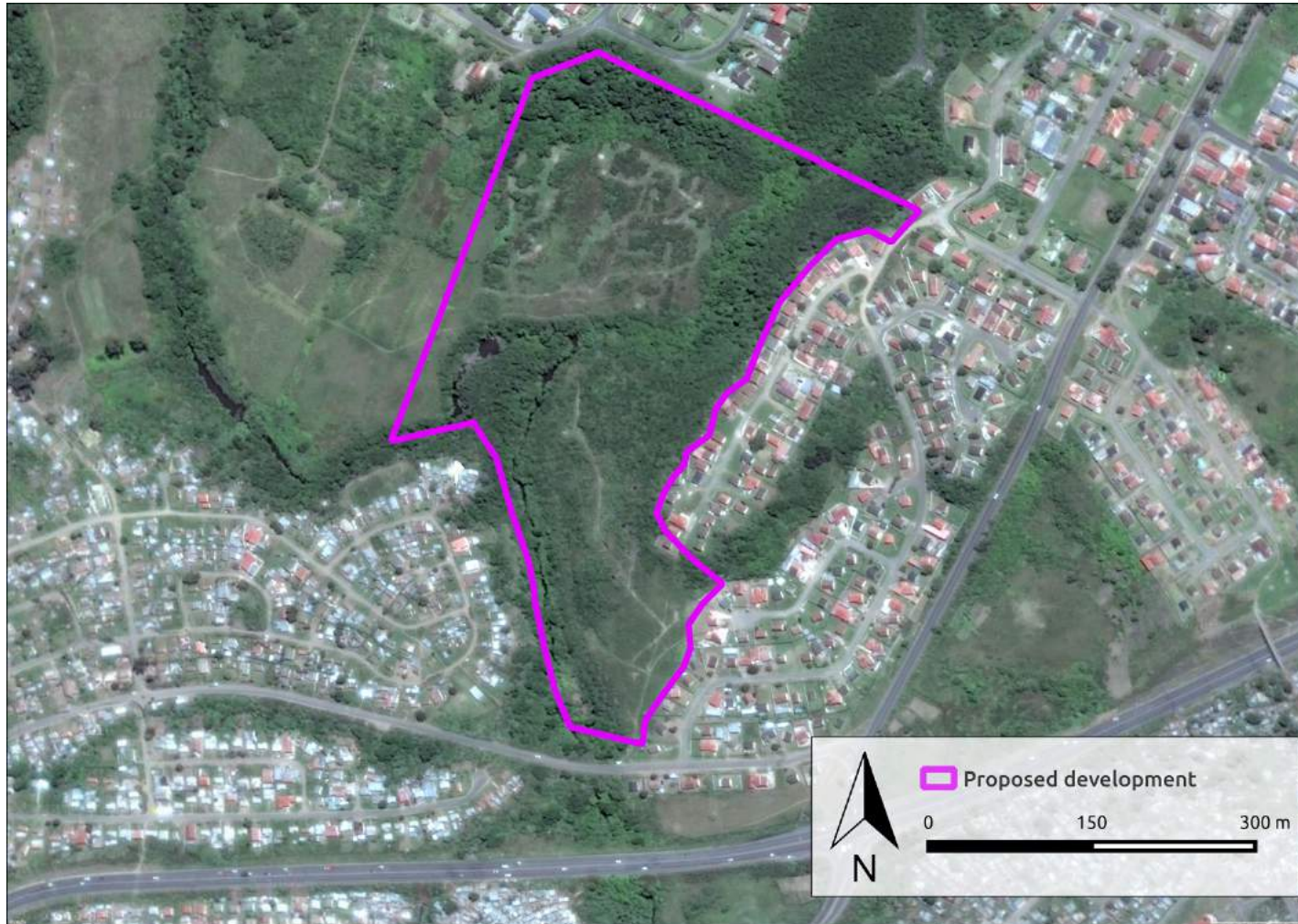
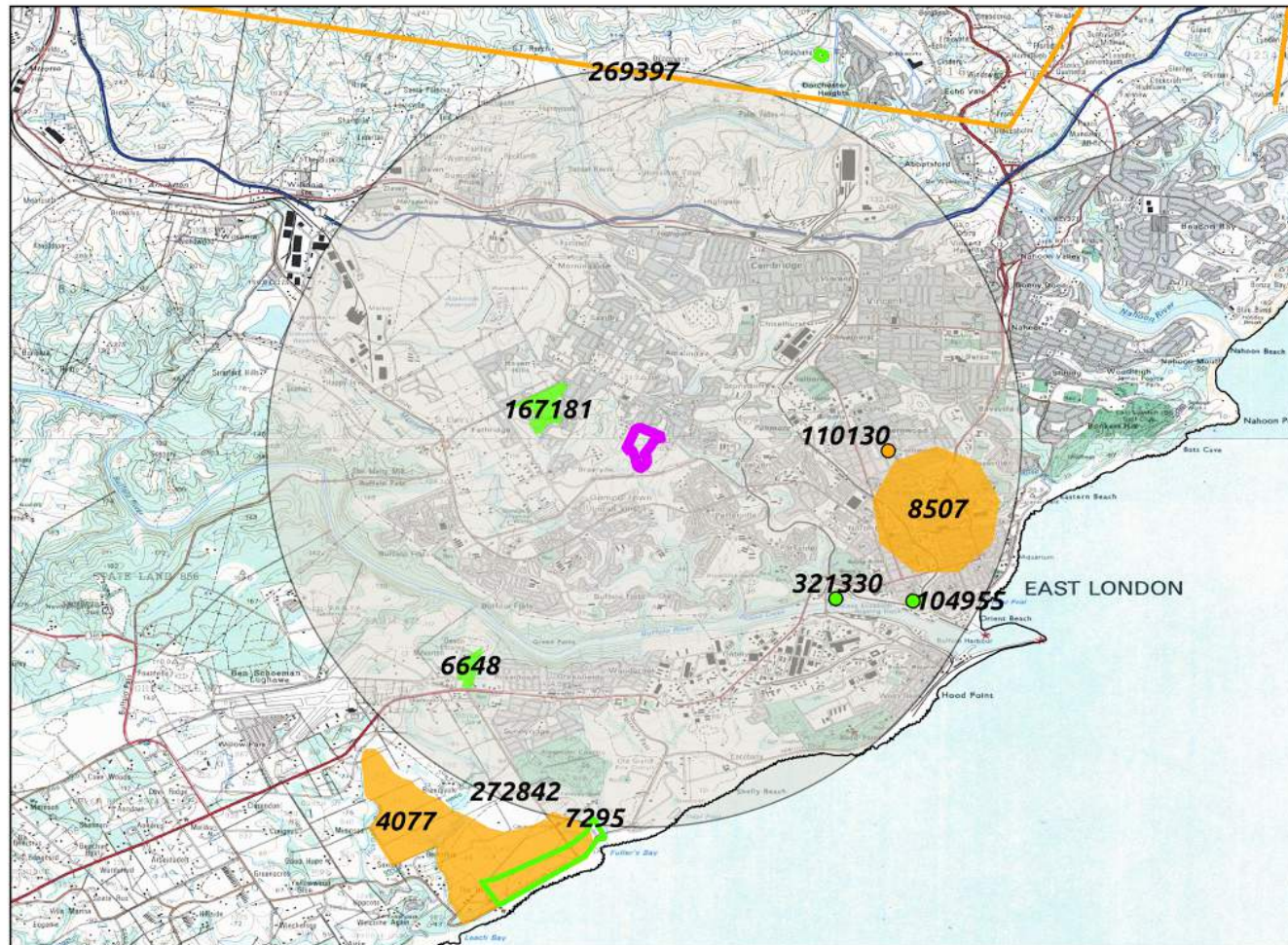


Figure 1b. Overview Map. Satellite image with proposed development indicated.



Legend

 Proposed development

 Inclusion Zone 5km

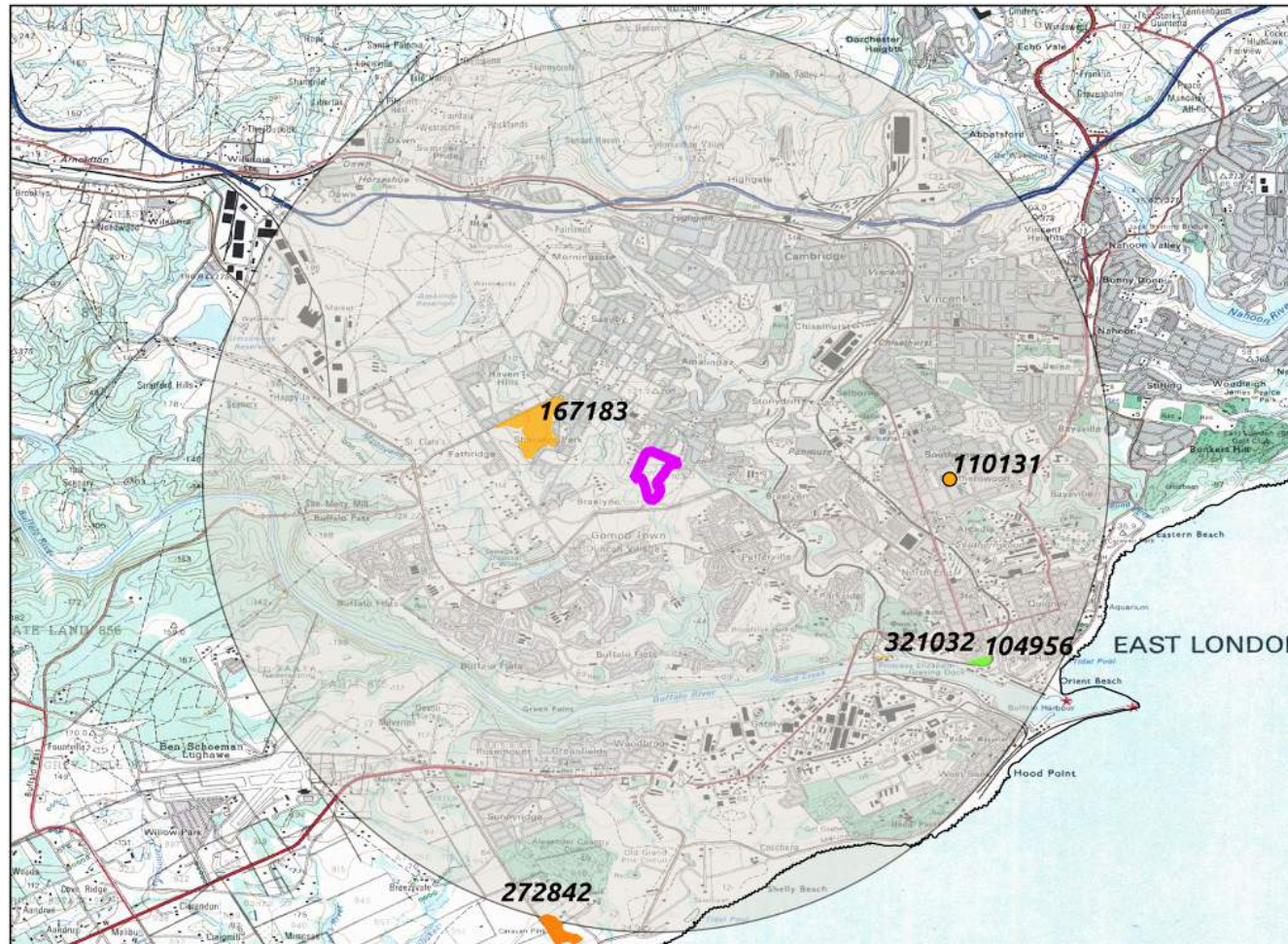
Previous assessments

 High coverage

 Medium coverage



Figure 2a. HIAs Map. Previous Heritage Impact Assessments done in and near the proposed development area (PIAs excluded) with SAHRIS NID labels indicated.



Legend

 Proposed development

 Inclusion Zone 5km

Previous assessments

 High coverage

 Medium coverage

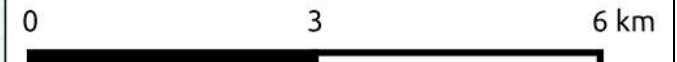


Figure 2b. HIAs Map. Close-up of previous surveys (PIAs excluded) with SAHRIS NID labels indicated.

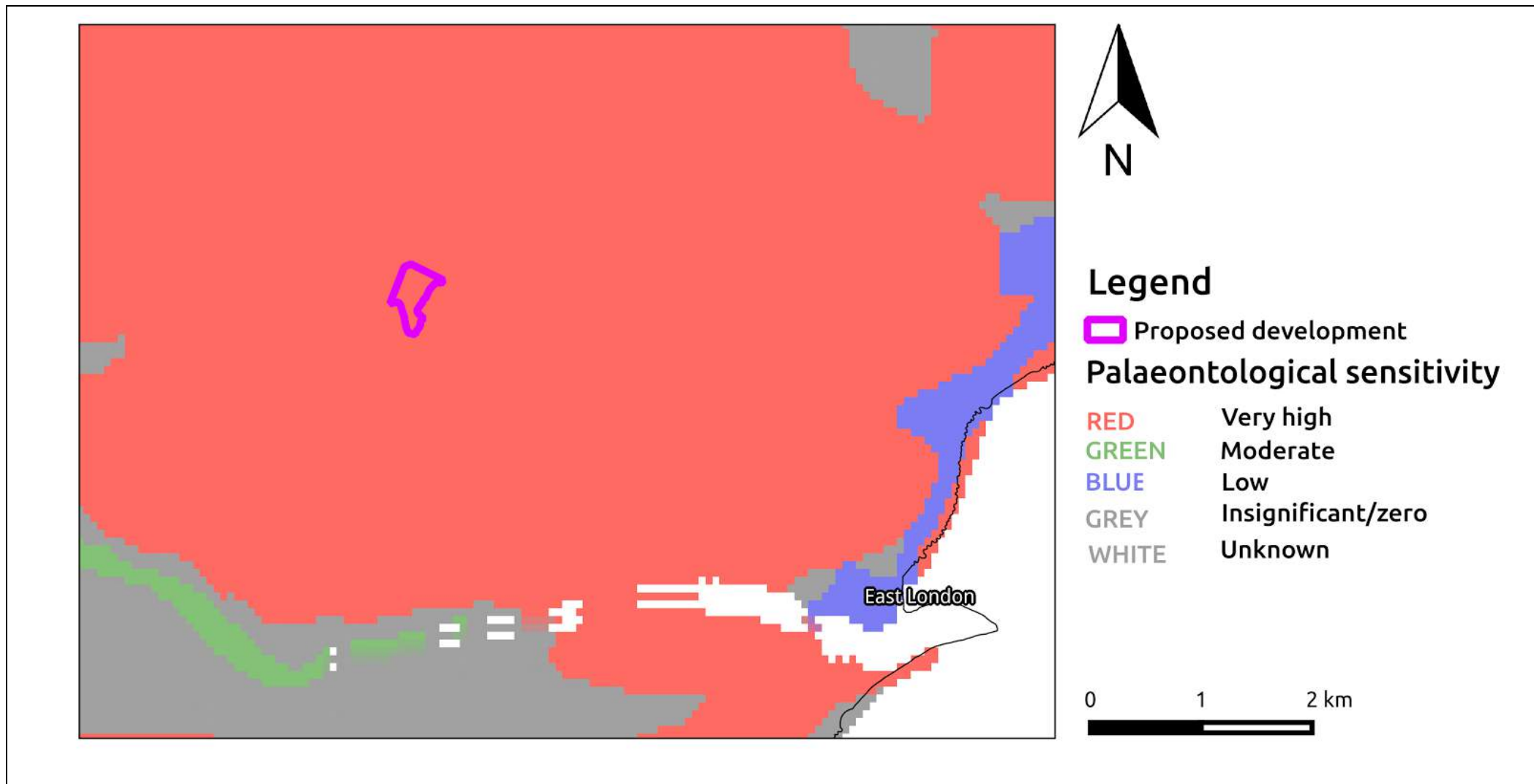
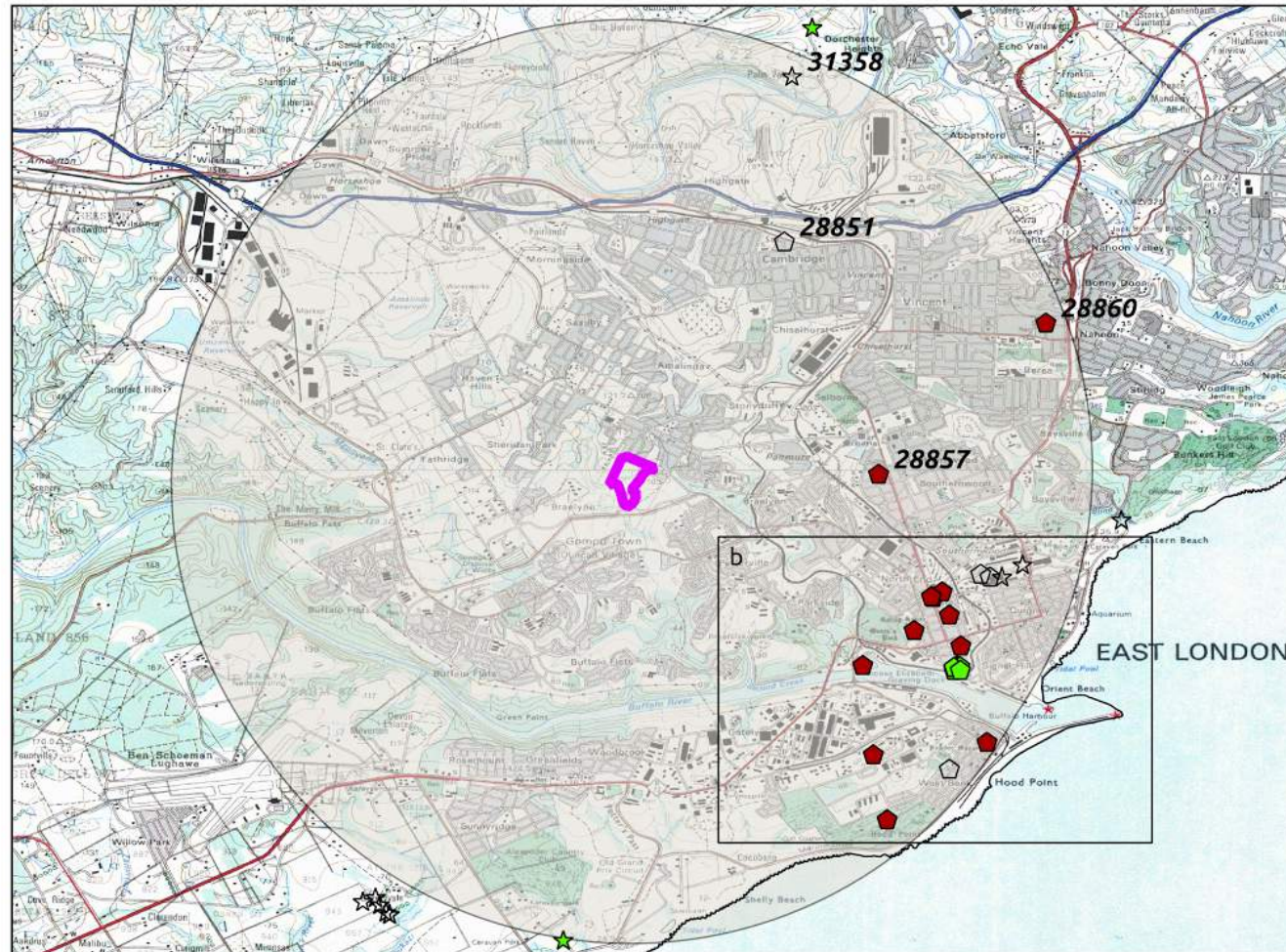


Figure 3a. Palaeo Map. Palaeosensitivity of the study area. See Appendix 3 for full guide to the legend.



Legend

- Proposed development
- Inclusion Zone 5km

Heritage resources

Type

- ☆ Arch, Bat, Geo, Met, Pal, Und
- ◊ Structures, Monuments & Memorials

Grading

- | | |
|---|----------|
| DARK RED | I & II |
| GREEN | IIIc |
| CLEAR | Ungraded |

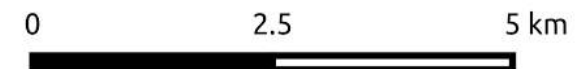


Figure 4a. Heritage Resources Map. Heritage resources previously identified in and near the study area, with SAHRIS Site IDs indicated (see figure 4b for inset).



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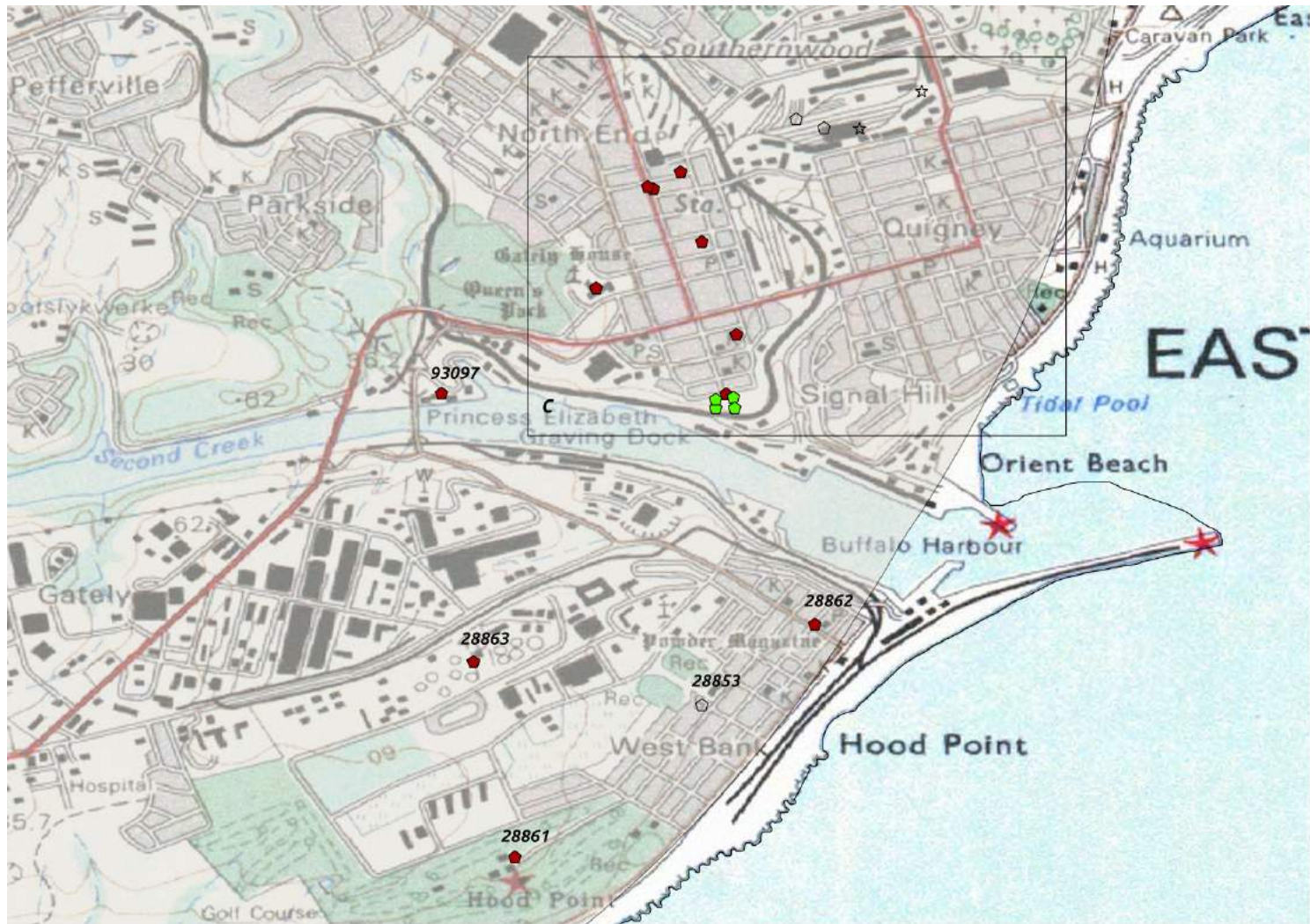


Figure 4b. Inset map



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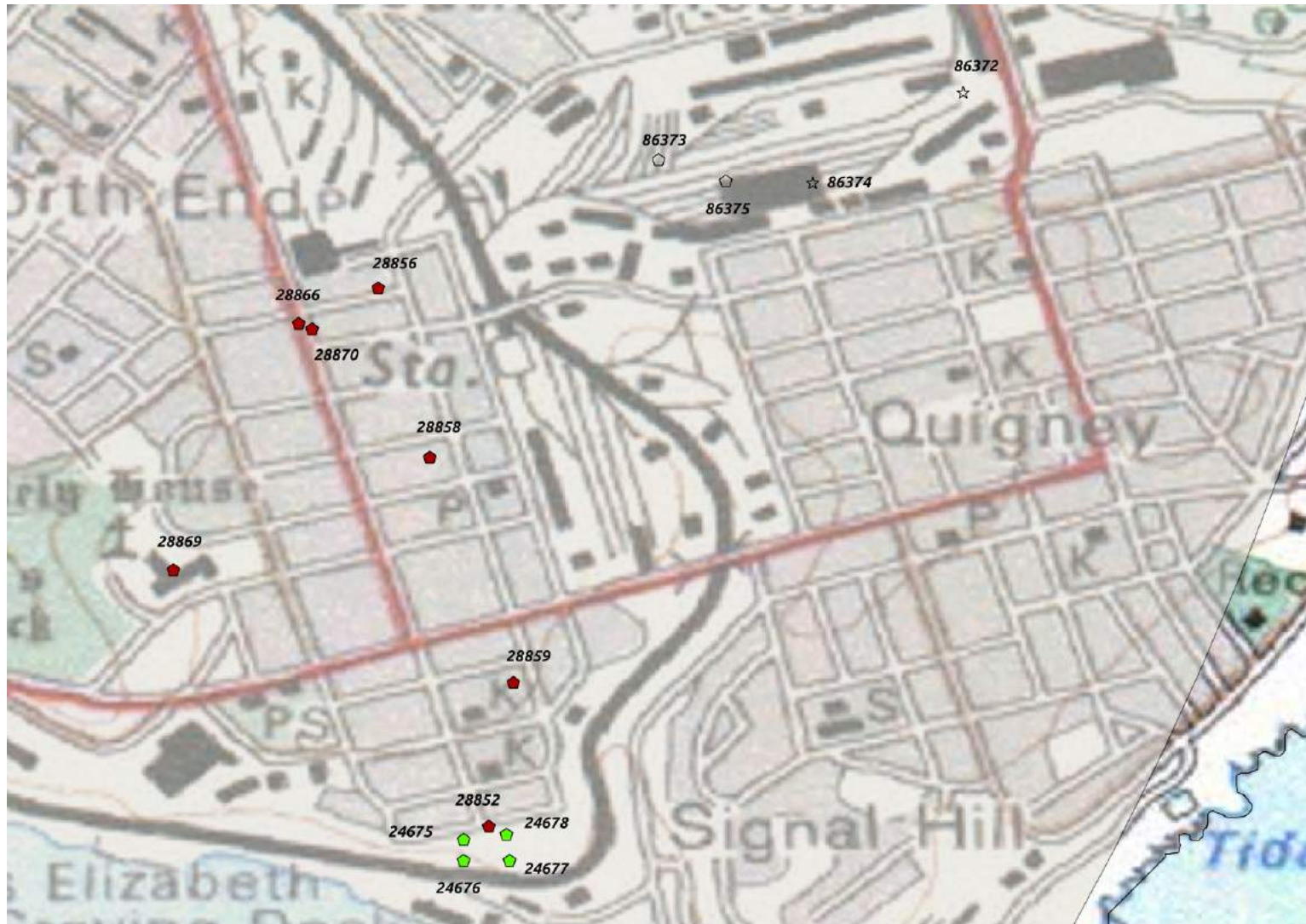


Figure 4c. Inset map



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Figure 4d. Google Earth historical satellite image (2002) - indicating possible kraals and stone walling.



Figure 4e. Google Earth historical satellite image (2015) - indicating the growth of vegetation and clearing of the northern and south-eastern portions.

8. Heritage statement and character of the area

Terreco Environmental has been appointed to prepare the Basic Environmental Impact Assessment (BAR) and Environmental Management Programme (EMPr) reports for the proposed Bengal Heights Commercial and Residential Development, off Bengal Road, Amalinda, East London. The proposed development will comprise of a 13.7 ha area. CTS screened the area for heritage surveys and resources within a 5km inclusion zone.

Several Heritage Impact Assessments (HIAs) and Archaeological Impact Assessments (AIAs) have been conducted in the vicinity, dating back to 1996 (please see Appendix 2 for full reference list). However no previous assessments have been conducted within the development location. The nearby Second Creek in the proposed development area may contain Stone Age material, although this is unlikely given the disturbed nature of the surrounding landscape. Several buildings and structures of provincial significance are located nearby (Grade II), however none of these resources will be impacted by the development. According to the 2002 Google Earth satellite map (Figure 4d), the area seems to have been used for farming and there is evidence of possible kraals and stone walling. However, in the 2015 image (Figure 4e), it can be seen that vegetation has grown densely in most areas and the northern and south-eastern portions appear to have been cleared and disturbed. Furthermore, the AIA conducted by van Ryneveld (2014) nearby for the similar development of Calypso Heights, ~ 1 km north-west, recorded no heritage resources but advised caution for the possibility of graves in the area. Considering the very similar nature of the Bengal Heights landscape, the presence of potential grave sites should also be accounted for and therefore we recommend that **an AIA be conducted**. However, the dense vegetation growing around the creek will make a foot survey quite difficult.

In terms of palaeontology, the area is underlain by the Middleton Formation of the Adelaide Subgroup, Beaufort Group, which is of very high fossil sensitivity. A foot survey was undertaken by Rossouw (2014) for the Calypso Heights development, which is underlain by the same geological formation. After his site visit he concluded that the bedrock was covered by a veneer of unconsolidated clayey soil and therefore rock exposure was very poor. Since the mudrock sequences of this formation possibly contain significant fossils, a Chance Finds Procedure was called for and he stated that the *"palaeontological impact will be considered high when excavations extend into fresh mudrock sequences."* (2014, p6). **It is therefore recommended that no PIA be conducted, but rather that a Palaeo Chance Find Procedure be included in the EMPs and that regular inspections by a palaeontologist of newly-cut mudrock within the Middleton Formation be conducted.**

APPENDIX 1 - Site Lists

List of sites within 5km inclusion zone and outside proposed development area

Site ID	Site no	Full Site Name	Site Type	Grading	Declaration
93097	Latimer's Landing jetty	Latimer's Landing jetty, East London Port	Structures	Grade II	
28869	9/2/026/0003	Gately House, 1 Park Gates Road, East London	Building	Grade II	Provincial Heritage Site
28870	9/2/026/0005	City Hall, Oxford Street, East London	Building	Grade II	Provincial Heritage Site
28862	9/2/026/0009	West Bank Post Office, Bank Street, East London	Building	Grade II	Provincial Heritage Site
28863	9/2/026/0010	Old Powder Magazine, Fort Glamorgan, East London	Building	Grade II	Provincial Heritage Site
28856	9/2/026/0014	Old Public Library, Argyle Street, East London	Building	Grade II	Provincial Heritage Site
28857	9/2/026/0015	Ann Bryant Art Gallery, St Lukes Road, East London	Building	Grade II	Provincial Heritage Site
28858	9/2/026/0016	Old Standard Bank Building, 64 Terminus Street, East London	Building	Grade II	Provincial Heritage Site
28859	9/2/026/0017	Wool Exchange Building, Rhodes University, 50 Church Street, East London	Building	Grade II	Provincial Heritage Site
28860	9/2/026/0028	Red House, Red House Avenue, East London	Building	Grade II	Provincial Heritage Site
28861	9/2/026/0031	Hood Point Lighthouse, East London	Building	Grade II	Provincial Heritage Site
28852	9/2/026/0034	Customs and Excise Building, East London	Building	Grade II	Provincial Heritage Site
28866	9/2/026/0013	Cuthbert's Building, 110 Oxford Street, East London	Building	Grade II	Provincial Heritage Site
24678	OHV001	Oxford Harbour View - OHV001	Archaeological, Structures	Grade IIIc	
24676	OHV003	Oxford Harbour View - OHV003	Structures	Grade IIIc	
24675	OHV004	Oxford Harbour View - OHV004	Archaeological, Structures	Grade IIIc	
24677	OHV002	Oxford Harbour View - OHV002	Structures	Grade IIIc	
86372	BC001	Buffalo City 001	Deposit	Ungraded	
86373	BC002	Buffalo City 002	Building	Ungraded	
86374	BC003	Buffalo City 003	Archaeological	Ungraded	



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86375	BC004	Buffalo City 004	Structures	Ungraded	
28851	9/2/026/0032	Cambridge Primary School, Brabant Street, East London	Building		Heritage Register
28853	9/2/026/0035	West Bank High School, Hood Street, East London	Building		Heritage Register
31358	UMLANDO-PV	Palm view	Archaeological		

APPENDIX 2 - Reference List

Nid	Report Type	Author/s	Date	Title
4077	AIA	Johan Binneman, Lita Webley	1/10/1996	Proposed Eastern Cape Zinc and Phosphoric Acid Project: Baseline Report: Sensitivity of Cultural Sites
8507	HIA	Lita Webley, Gillian Vernon	30/01/2008	Phase 1 Heritage Impact Assessment: The Construction of a Dual Carriageway Linking Fitzpatrick Road and Currie Street on the "Sleeper Site", Erf 15835 Buffalo City, Eastern Cape
6648	AIA	Karen Van Ryneveld	18/07/2008	Phase 1 Archaeological Impact Assessment: Industrial Development, Erven 17532 & 49336, Orange Grove, East London, Eastern Cape, South Africa
7295	AIA	Gavin Anderson	4/3/2010	Heritage Survey of the marine Aquaculture Zone, East London Industrial Development Zone: EIA References: AR/7/F/1 (e), 1(p)/1/09 & AR/7/F/1 (e), 1 (p)/2/09: DEDEA East London
104955	AIA	Karen Van Ryneveld	5/11/2012	Phase 1 Archaeological Impact Assessment - Oxford Harbour View Development, Erven 15833, 15834, 15835 And 33367, East London, Eastern Cape, South Africa
110130	AIA	Karen Van Ryneveld	28/01/2013	Phase 1 Archaeological Impact Assessment: Willowvale-dwesa Borrow Pits Roject, Amathole District Municipality, Eastern Cape, South Africa
167181	AIA	Karen Van Ryneveld	30/06/2014	Phase 1 Archaeological Impact Assessment - Calypso Heights Commercial and Residential Development, off Woolwash Road, Amalinda, East London, BCMM, Eastern Cape, South Africa
269397	AIA	Celeste Booth	2/3/2015	FibreCo Repeater Sites Routes 3 and 4_Heritage_2015 AIA report
321330	AIA	Loudine Philip	20/07/2015	Phase 1 Archaeological Impact Assessment Report for the for the proposed rehabilitation and refurbishment of the existing Latimer's Landing jetty at the Port of East London
272842	HIA	Gavin Anderson	26/03/2015	Heritage Survey Of The East London Idz Photovoltaic Facility , Eastern Cape
272842	PIA	Gideon Groenwald	31/10/2010	Statement: Potential Palaeontological Impact - IDZ East London: Fish Farm
104956	PIA	Lloyd Rossouw	30/11/2012	Phase 1 Palaeontological Impact Assessment of a proposed new conference and development center near the Port of East London, EC Province.
110131	PIA	Lloyd Rossouw	28/01/2013	Phase 1 Palaeontological Impact Assessment of 2 Quarries and 6 Borrow Pits, between Willowvale and Dwesa, EC Province.



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


167183	PIA	Lloyd Rossouw	30/06/2014	Phase 1 Palaeontological Impact Assessment - Calypso Heights Commercial and Residential Development, off Woolwash Road, Amalinda, East London, BCMM, Eastern Cape, South Africa
321032	PIA	Lloyd Rossouw	20/07/2015	Palaeontological Impact Assessment for the Proposed Rehabilitation and Refurbishment of the existing Latimer's Landing jetty at the Port of East London (Part 1 of HIA)

APPENDIX 3 - Keys/Guides

Key/Guide to Acronyms

AIA	Archaeological Impact Assessment
DEA	Department of Environmental Affairs
DEDEA	Department of Economic Development, Environmental Affairs and Tourism
DMR	Department of Mineral Resources
HIA	Heritage Impact Assessment
HWC	Heritage Western Cape
MPRDA	Mineral and Petroleum Resources Development Act, no 28 of 2002
NEMA	National Environmental Management Act, no 107 of 1998
NHRA	National Heritage Resources Act, no 25 of 1999
PIA	Palaeontological Impact Assessment
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
VIA	Visual Impact Assessment

Full guide to Palaeosensitivity Map legend

	RED:	VERY HIGH - field assessment and protocol for finds is required
	ORANGE/YELLOW:	HIGH - desktop study is required and based on the outcome of the desktop study, a field assessment is likely
	GREEN:	MODERATE - desktop study is required
	BLUE/PURPLE:	LOW - no palaeontological studies are required however a protocol for chance finds is required
	GREY:	INSIGNIFICANT/ZERO - no palaeontological studies are required
	WHITE/CLEAR:	UNKNOWN - these areas will require a minimum of a desktop study.



APPENDIX 4 - Methodology

The Heritage Screener summarises the heritage impact assessments and studies previously undertaken within the area of the proposed development and its surroundings. Heritage resources identified in these reports are assessed by our team during the screening process.

The heritage resources will be described both in terms of **type**:

- Group 1: Archaeological, Underwater, Palaeontological and Geological sites, Meteorites, and Battlefields
- Group 2: Structures, Monuments and Memorials
- Group 3: Burial Grounds and Graves, Living Heritage, Sacred and Natural sites
- Group 4: Cultural Landscapes, Conservation Areas and Scenic routes

and **significance** (Grade I, II, IIIa, b or c, ungraded), as determined by the author of the original heritage impact assessment report or by formal grading and/or protection by the heritage authorities.

Grading of heritage sites which form part of the national estate is defined in s. 7 of the National Heritage Resources Act (NHRA) as:

*(a) **Grade I:** Heritage resources with qualities so exceptional that they are of special national significance; Examples of these sites are Mapungubwe Cultural Landscape, The Parliament of South Africa, Sarah Baartman Burial Site, Robert Sobukwe's grave, Lake Fundudzi, Voortrekker Monument, Union Buildings.*

*(b) **Grade II:** 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; they are normally declared Provincial Heritage Sites under s. 27 of the NHRA after the competent Provincial Heritage Resources Authority has established their significance. Many of the current Provincial Heritage Sites were declared National Monument under the previous heritage legislation and their status was changed to Provincial Heritage Sites when the National Heritage Resources Act was proclaimed in 1999. Amongst these sites, Mapoch's Caves in Limpopo, Umhlathuzana Rock Shelter in KwaZulu Natal, Van der Stel's Copper Mine in the Northern Cape, the old Cemetery in Grahamstown, Eastern Cape and Baboon Point, in the Western Cape.*

*(c) **Grade III:** Other heritage resources worthy of conservation, and which prescribes heritage resources assessment criteria, consistent with the criteria set out in section 3(3), which must be used by a heritage resources authority or a local authority to assess the intrinsic, comparative and contextual significance of a heritage resource and the relative benefits and costs of its protection, so that the appropriate level of grading of the resource and the consequent responsibility for its management may be allocated (...).*

The following sub-categories are currently in use for Grade III::

Grade IIIa sites are sites of such a high local significance that should be protected and retained. These sites should be included in the heritage register of each province as defined in s. 30 of the NHRA and should not be impacted upon. In the instance of buildings, any alteration must be regulated. Because of their nature, all human remains are considered of high significance. While relocation of graves is common practice, this should always be considered as the last option. Examples of these sites are all graves and burial grounds which have not been graded I or II, Peers Cave in Western Cape,



Grade IIIb sites are resources of medium local significance. They should preferably be retained where possible, but where not possible the site must be fully investigated and/or mitigated. After mitigation they may be impacted upon.

Grade IIIc sites are of low local significance. These resources must be satisfactorily studied before destruction. In many instances the recording and description of the site undertaken at the heritage impact assessment level is sufficient and further recording or mitigation may not be required. These sites include for instance small knapping sites which have been sufficiently recorded at the archaeological impact assessment level, palaeontological fossils of low significance which do not require recovery. In the case of the built environment, IIIc structures will only require protection and regulation if the significance of the environs in which they are located is sufficient to warrant protective measures.

The heritage specialist in the field should suggest a grading for the site, but it will then need to be ratified and accepted by the competent heritage authority.

DETERMINATION OF THE EXTENT OF THE INCLUSION ZONE TO BE TAKEN INTO CONSIDERATION

The extent of the inclusion zone to be considered for the Heritage Screener will be determined by CTS based on:

- the size of the development,
- the number and outcome of previous surveys existing in the area
- the potential cumulative impact of the application.

The inclusion zone will be considered as the region within a maximum distance of 50 km from the boundary of the proposed development.

DETERMINATION OF THE PALAEOONTOLOGICAL SENSITIVITY

The possible impact of the proposed development on palaeontological resources is gauged by:

- reviewing the fossil sensitivity maps available on the South African Heritage Resources Information System (SAHRIS)
- considering the nature of the proposed development
- when available, taking information provided by the applicant related to the geological background of the area into account

DETERMINATION OF THE COVERAGE RATING ASCRIBED TO A REPORT POLYGON

Each report assessed for the compilation of the Heritage Screener is colour-coded according to the level of coverage accomplished. The extent of the surveyed coverage is labeled in three categories, namely low, medium and high. In most instances the extent of the map corresponds to the extent of the development for which the specific report was undertaken.

Low coverage will be used for:

- desktop studies where no field assessment of the area was undertaken;
- reports where the sites are listed and described but no GPS coordinates were provided.



- older reports with GPS coordinates with low accuracy ratings;
- reports where the entire property was mapped, but only a small/limited area was surveyed.
- uploads on the National Inventory which are not properly mapped.

Medium coverage will be used for

- reports for which a field survey was undertaken but the area was not extensively covered. This may apply to instances where some impediments did not allow for full coverage such as thick vegetation, etc.
- reports for which the entire property was mapped, but only a specific area was surveyed thoroughly. This is differentiated from low ratings listed above when these surveys cover up to around 50% of the property.

High coverage will be used for

- reports where the area highlighted in the map was extensively surveyed as shown by the GPS track coordinates. This category will also apply to permit reports.

RECOMMENDATION GUIDE

The Heritage Screener includes a set of recommendations to the applicant based on whether an impact on heritage resources is anticipated. One of three possible recommendations is formulated:

(1) The heritage resources in the area proposed for development are sufficiently recorded - The surveys undertaken in the area adequately captured the heritage resources. There are no known sites which require mitigation or management plans. No further heritage work is recommended for the proposed development.

This recommendation is made when:

- enough work has been undertaken in the area
- it is the professional opinion of CTS that the area has already been assessed adequately from a heritage perspective for the type of development proposed

(2) The heritage resources and the area proposed for development are only partially recorded - The surveys undertaken in the area have not adequately captured the heritage resources and/or there are sites which require mitigation or management plans. Further specific heritage work is recommended for the proposed development.

This recommendation is made in instances in which there are already some studies undertaken in the area and/or in the adjacent area for the proposed development. Further studies in a limited HIA may include:

- improvement on some components of the heritage assessments already undertaken, for instance with a renewed field survey and/or with a specific specialist for the type of heritage resources expected in the area
- compilation of a report for a component of a heritage impact assessment not already undertaken in the area
- undertaking mitigation measures requested in previous assessments/records of decision.



(3) The heritage resources within the area proposed for the development have not been adequately surveyed yet - Few or no surveys have been undertaken in the area proposed for development. A full Heritage Impact Assessment with a detailed field component is recommended for the proposed development.

Note:

The responsibility for generating a response detailing the requirements for the development lies with the heritage authority. However, since the methodology utilised for the compilation of the Heritage Screeners is thorough and consistent, contradictory outcomes to the recommendations made by CTS should rarely occur. Should a discrepancy arise, CTS will immediately take up the matter with the heritage authority to clarify the dispute.

The compilation of the Heritage Screener will not include any field assessment. The Heritage Screener will be submitted to the applicant within 24 hours from receipt of full payment. **If the 24-hour deadline is not met by CTS, the applicant will be refunded in full.**