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HERITAGE SCREENER

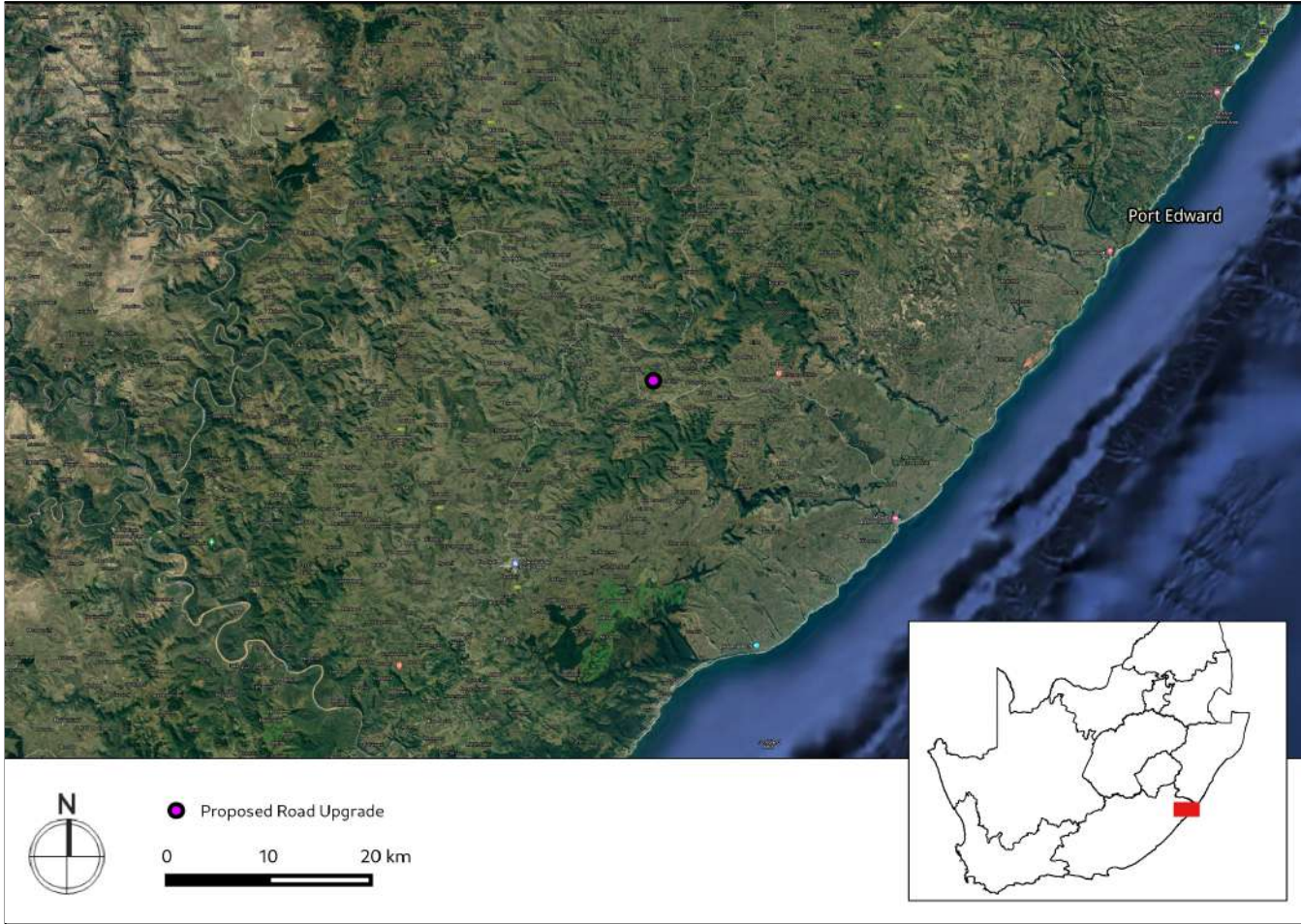
CTS Reference Number:	CTS21_182	
SAHRIS Ref:		
Client:	ACRM	
Date:	August 2021	
Title:	<p>PHASE 1 HERITAGE ASSESSMENT STUDY FOR THE CONSTRUCTION OF INGQUZA HILL ROAD IN NGUBENGCUKA COMMUNITY, FLAGSTAFF.</p>	
Recommendation by CTS Heritage Specialists	<p>RECOMMENDATION: Based on the available information, it is unlikely that the proposed development will impact on significant heritage resources. As Such it is recommended that no further studies are required in terms of section 38 of the NHRA. Should any heritage resources such as archaeological material, unmarked burials or fossil material be unearthed during excavations, work must cease in this area and ECPHRA must be contacted regarding an appropriate way forward. The attached Chance Fossil Finds Procedure must be implemented.</p>	

Figure 1a. Satellite map indicating the location of the proposed development in the Eastern Cape Province



1. Proposed Development Summary

Lugaju Innovations (Pty) Ltd has been appointed by Knight Piésold (Pty) Ltd on behalf of SANRAL SOC Limited for the provision of environmental subservices for the construction of Ingquza Hill Road in Ngubengcuka community. The proposed development is located within Ingquza Hill Local Municipality in Ngubengcuka Community and is the main access road to Ingquza Hill Memorial Site. The road comprises of two sections, Road 1 and Road 2 and forms a link with Holy Cross Road with road coordinates alluded in appendix 1. Road 1 is approximately 5.88km long and Road 2 is approximately 3.81km long. Road 2 is approximately 3.2m in width and starts at Holy Cross Gravel Road meander down to a river crossing 0+600 and proceeds in the north-westerly direction up a mountain pass, transverses through a small dense village and ends at the intersection with Ingquza Hill Road 1 at 1+600km. Ingquza Hill Road 1, with a width of 4.8m, extends from the Holy Cross Main road in a north-easterly direction traversing through a dense rural community and ends at the Ingquza Memorial Site at approximately 5.880km.

The primary objective of the proposed development is to provide safe road access to the Ingquza Memorial Site and to provide proper road access to the nearby communities. The planned construction is the refurbishment of existing Roads 1&2 and no major excavation is planned. Both roads have been designed such that they closely match the existing road level. The work will include minor excavations of the width to upgrade the existing roads. This will be approximately 475mm below the existing road level/design level to construct new pavement structures (layer works). There are also a few culverts that will need to be constructed which will require some minor excavations as well.

2. Application References

Name of relevant heritage authority(s)	ECPHRA
Name of decision making authority(s)	DEDEAT

3. Property Information

Latitude / Longitude	31°11'46.05"S 29°42'56.96"E
Erf number / Farm number	Road Reserve
Local Municipality	Ingquza Hill Local Municipality
District Municipality	OR Tambo
Province	Eastern Cape
Current Use	Road Reserve
Current Zoning	Road Reserve
Total Extent of Property	5.88km and 3.81km

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4. Nature of the Proposed Development

Total Surface Area of development	5.88km and 3.81km
Depth of excavation (m)	<0.5m
Height of development (m)	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
x	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
	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

None, no new borrow pits proposed

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7. Mapping (please see Appendix 3 and 4 for a full description of our methodology and map legends)

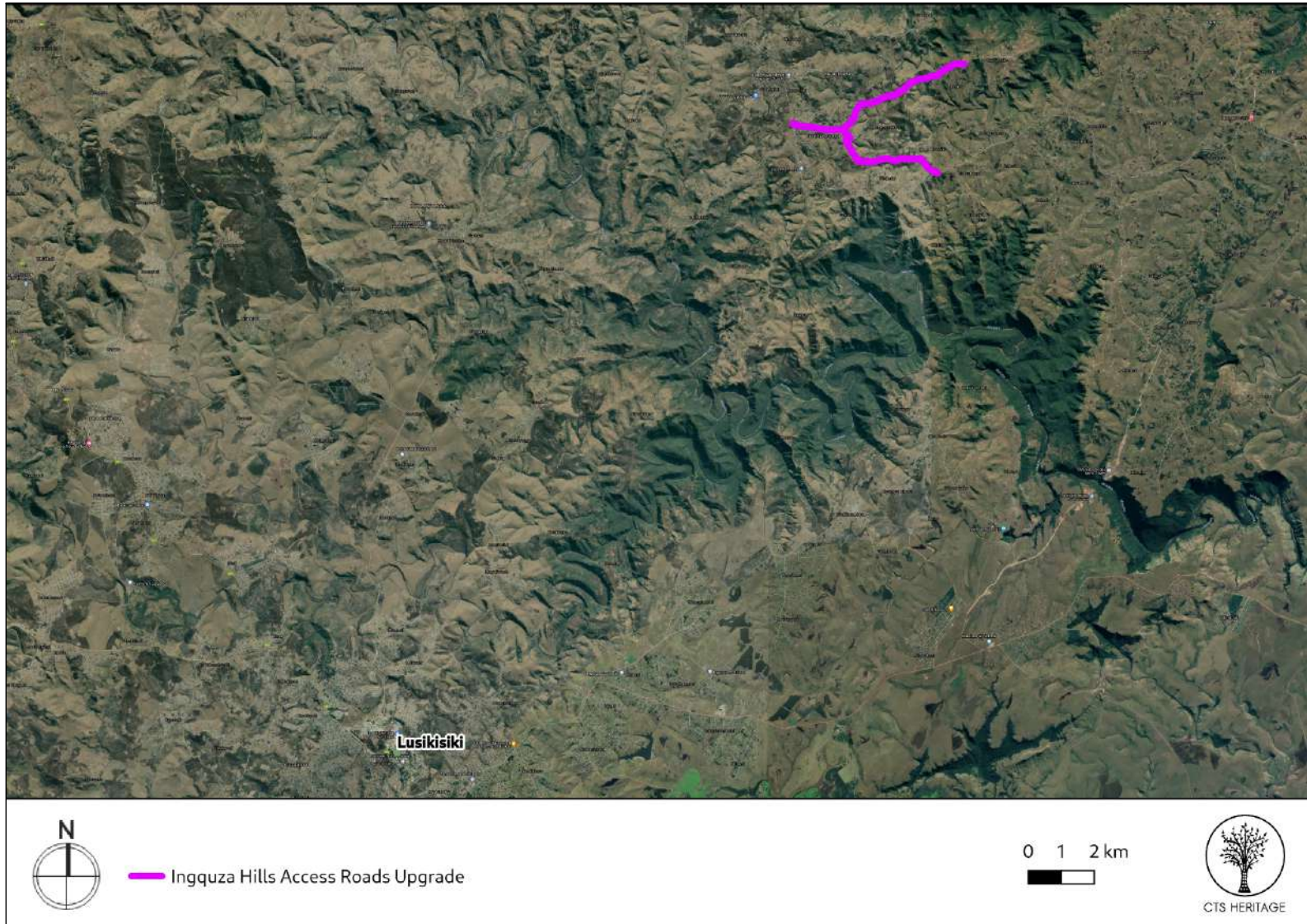


Figure 1b Overview Map. Satellite image (2019) indicating the proposed development area at closer range.



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— Ingquza Hills Access Roads Upgrade

0 0,5 1 km



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Figure 1c. Overview Map. Satellite image (2019) indicating the proposed development area at closer range.

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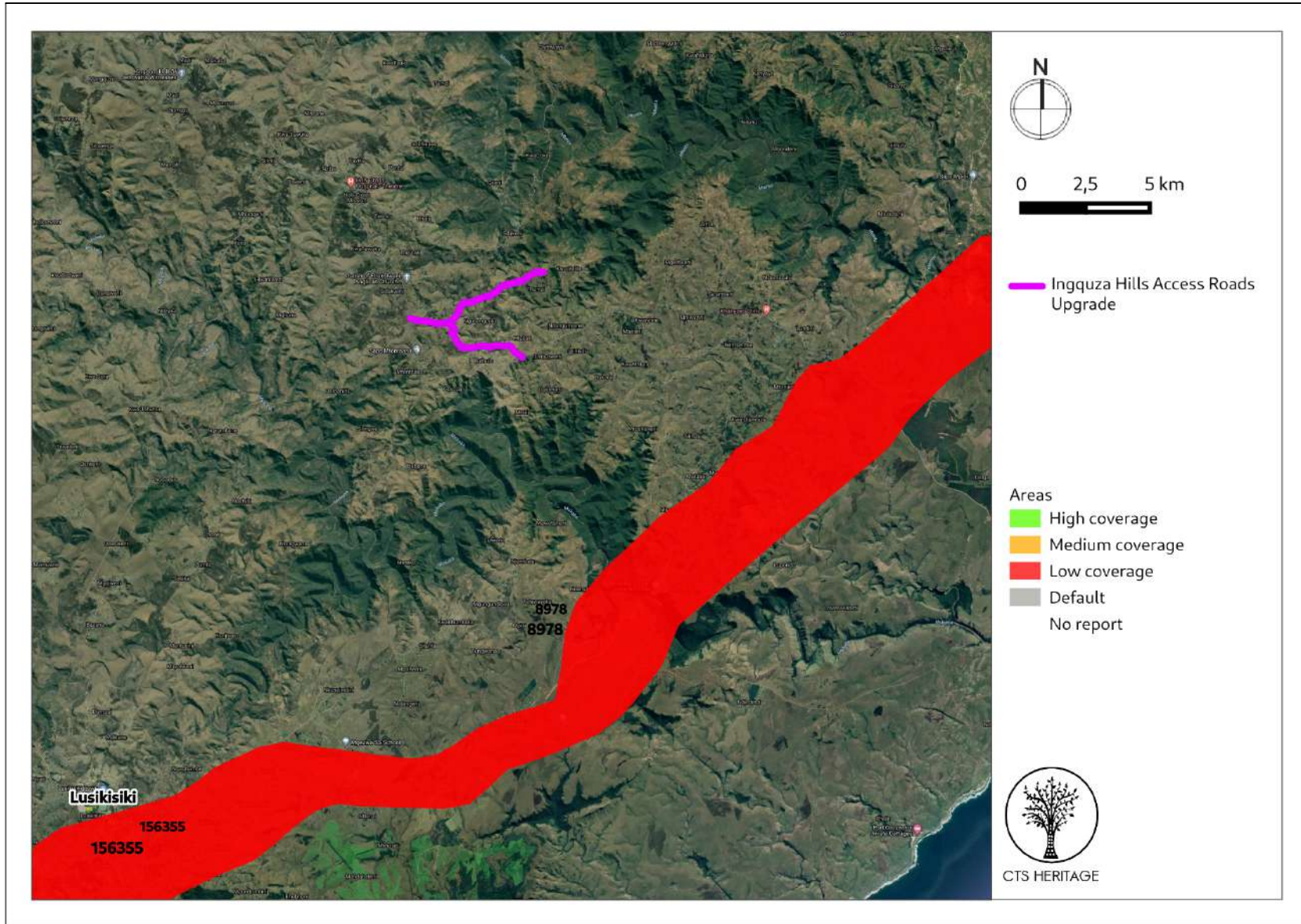


Figure 2. Previous HIAs Map. Previous Heritage Impact Assessments surrounding the proposed development area, with SAHRIS NIDS indicated. Please see Appendix 2 for a full reference list.



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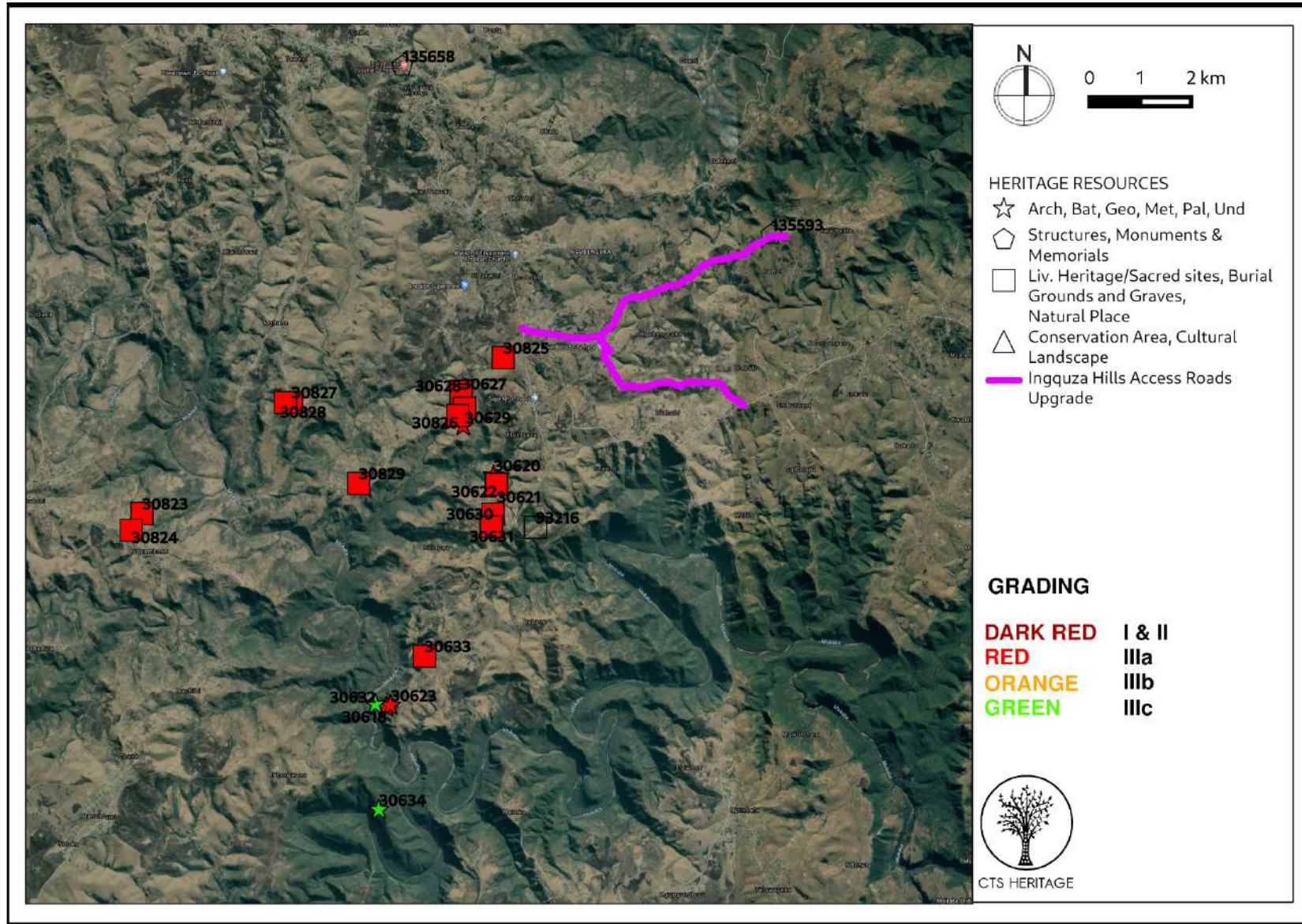


Figure 3a. Heritage Resources Map. Heritage Resources previously identified in and near the study area, with SAHRIS Site IDs indicated. Please See Appendix 4 for full description of heritage resource types.

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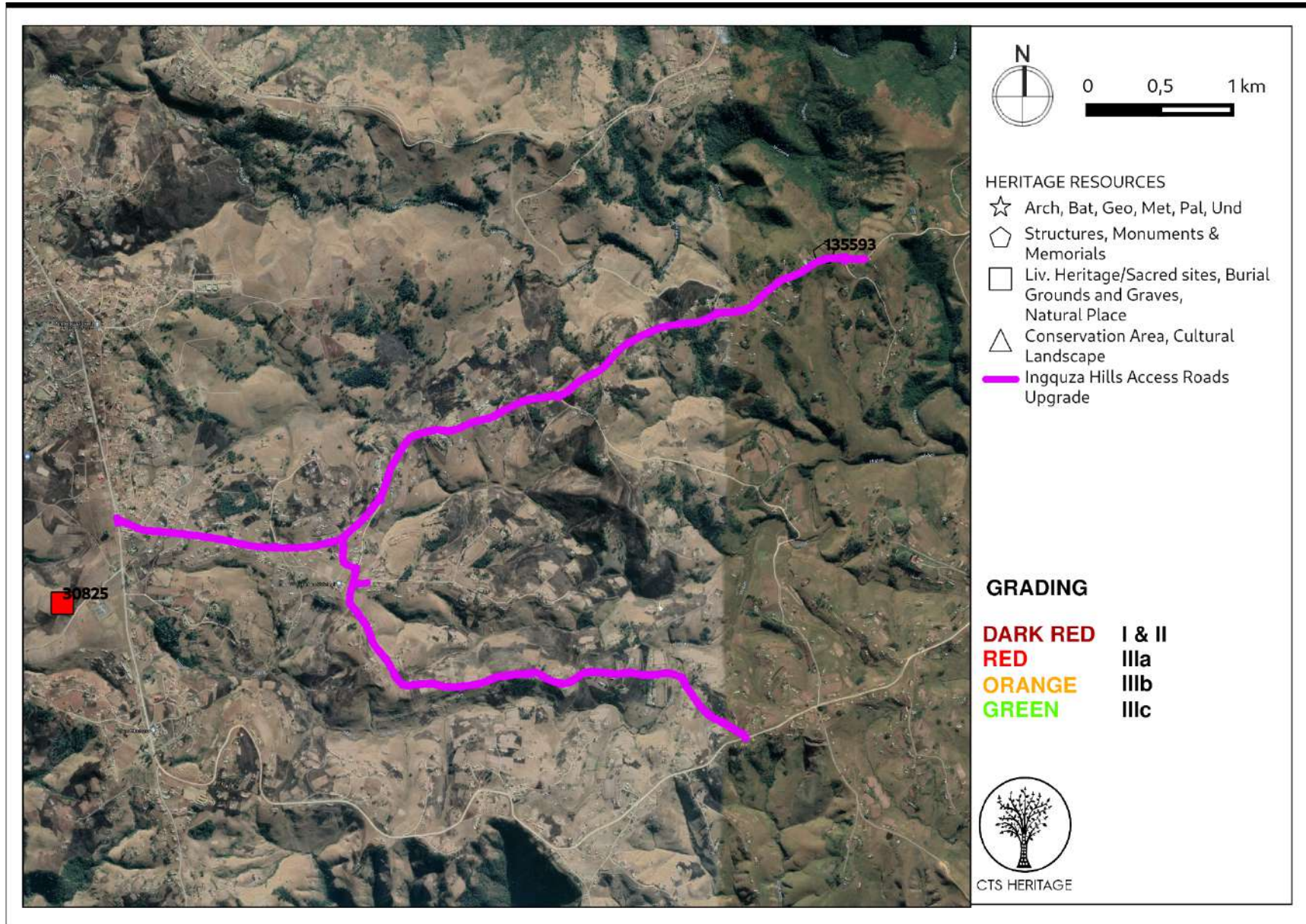


Figure 3b. Heritage Resources Map. Heritage Resources Inset A

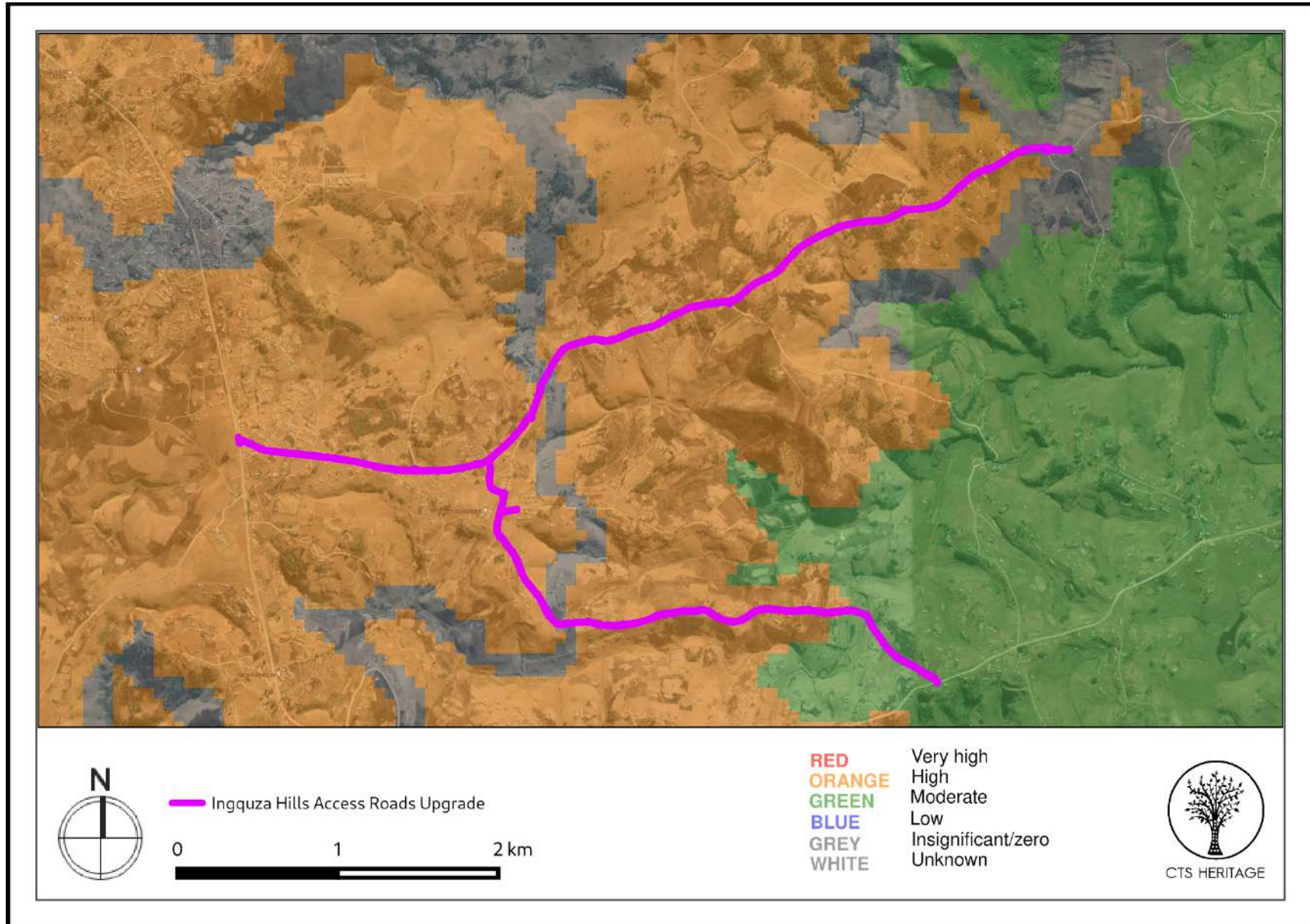


Figure 4. Palaeosensitivity Map. Indicating Zer, Moderate and High fossil sensitivity underlying the study area. Please See Appendix 3 for a full guide to the legend.

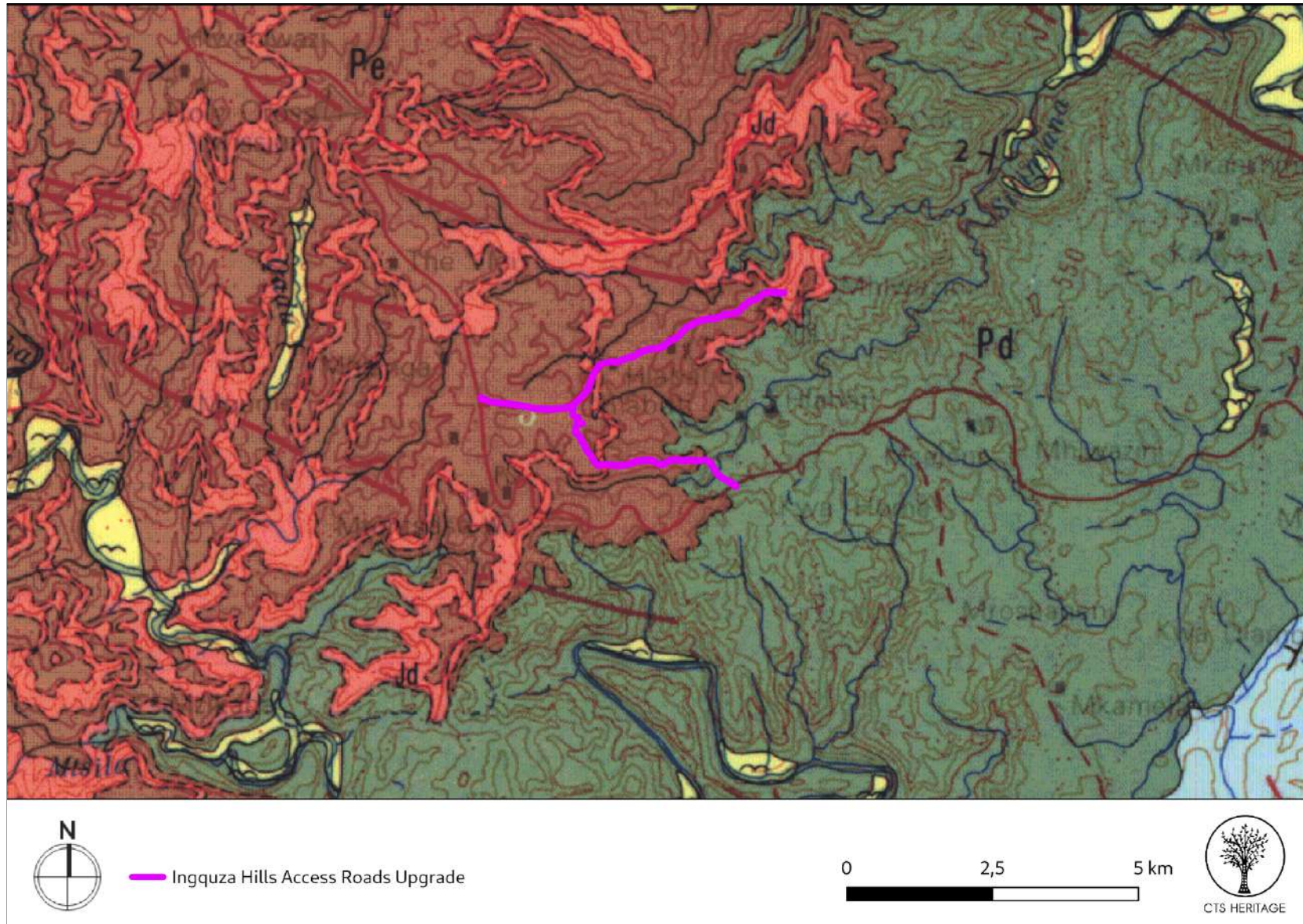


Figure 5. Geology Map. Indicating the underlying geology across the study area through overlaying the geology maps from the CGS series 3128 Umtata (Jd: Jurassic Dolerite, Pe: Ecca Group sediments (Dark grey shale, sandstone, mudstone); Pd: Dwyka Formation of the Ecca Group (Tillite))



8. Heritage statement and character of the area

This application is for the proposed upgrades to two existing roads that lead to the Inquza Hill Memorial Site, located approximately 22km north east of Lusikisiki in the Eastern Cape. According to Fourie (2011, SAHRIS NID 45004), “between 500 to 1200 years ago the movement of Bantu speaking people from the Great lakes area of Central Africa reached the Eastern Cape Region of South Africa (Huffman, 2007). The Xhosa speaking people that settled on the south eastern coast of Southern Africa consist of 12 tribes of which the amaPondo is one. The amaPondo migrated across the Mtamvuna River in the late 1700’s due to population pressure from the Zulu clan expansion from the north, and settled in the area between the Mtamvuna and Mzimvubu Rivers... Lusikisiki was established as a military outpost around 1894 when Pondoland was annexed by the Cape Colony. The years after annexation were of relative calm to the mid-1900’s with the rise of the AmaPondo against the Bantu Administration activities of the Apartheid government around 1955. This upheaval culminated in the Pondo Revolt and the Ngquca (or Inquza) Hill killings on 6 June 1960.” This massacre is memorialised at the Nquza Hill Memorial Site (SAHRIS Site ID 135593 in Figure 3 and 3a).

According to the record on SAHRIS, “On the 6th June 1960 more than thousand Pondo's from Eastern Pondoland (Bizana ,Lusikisiki, Flagstaff and Ntabankulu) met at Ingquza Hill with the intention of discussing their problems. They demanded the withdrawal of the hated system of the Bantu Authorities Act, the representation of all South Africans in the republic's parliament, relief from increased taxes and the abolition of the pass system. Before these problems were tabled before the people, a military force had occupied Ingquza hill. The peaceful meeting turned into a massacre of innocent people when police shot victims, tear gassed them and beat them with batons. Eleven people were killed. Many of them were shot at the back of their heads; and more than 48 casualties were hospitalized and twenty three people were arrested and sentenced to imprisonment. As an act of revenge the insurgents killed several headmen and others who had been cooperating with the government. It was to be several years before the dissatisfaction in Pondoland died down.” This application is intended to improve public access to the memorial site through the upgrade of relevant approach roads and as such, will contribute to education and awareness-raising around this significant site.

Very few heritage impact assessments have been completed in close proximity to the proposed road upgrades (Figure 2). However, a number of heritage resources have been identified in close proximity to the development area (Figure 3 and 3a). These resources consist predominantly of settlements, artefacts and burial grounds. As this application is for the proposed upgrade of existing roads, it is not anticipated that any significant archaeological resources will be negatively impacted by the proposed development. However, as no evidence of previous surveys of the area by an archaeologist are available, it remains possible that archaeological resources may be accidentally impacted by the proposed road upgrade. Should archaeological resources or burials be accidentally impacted during construction activities, work must cease in that area and ECPHRA must be contacted regarding an appropriate way forward.

According to the SAHRIS Palaeosensitivity Map, the area proposed for development is underlain by sediments of high palaeontological sensitivity (Figure 4). The sediments underlying the area proposed for development include Ecca Group sediments (Figure 5). According to a report drafted by Almond (2011 SAHRIS NID 45005) for a proposed development in Lusikisiki, “The Mid to Late Permian fossil heritage of the basinal, mudrock-dominated Ecca Group succession in the Port St Johns area is also very sparse and poorly-known... body fossils have not been recorded from the Ecca beds here but trace fossils (“fucoid-like impressions”) are locally very abundant.” Almond (2011) goes on to recommend that the “sparse fossil content” of the Ecca Group sediments in the study area contain “mainly low-diversity trace fossil assemblages within thinly laminated mudrocks” which have “often been compromised by deep chemical weathering and nearby dolerite intrusions. The Karoo Supergroup bedrocks in this area are mantled by deep soils that are themselves largely unfossiliferous.” The observations made by Almond (2011) can also be applied to the sediments underlying the development area. Based on the observations of Almond (2011) and on the limited nature of the excavations anticipated (less than 500mm below the existing surface), the proposed development is unlikely to impact significant palaeontological heritage. However, due to the high levels of palaeontological sensitivity in this area, its is recommended that the attached Chance Fossil Finds Procedure is implemented for the duration of construction activities.



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RECOMMENDATION:

Based on the available information, it is unlikely that the proposed development will impact on significant heritage resources. As Such it is recommended that no further studies are required in terms of section 38 of the NHRA. Should any heritage resources such as archaeological material, unmarked burials or fossil material be unearthed during excavations, work must cease in this area and ECPHRA must be contacted regarding an appropriate way forward. The attached Chance Fossil Finds Procedure must be implemented.

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APPENDIX 1

List of heritage resources within close proximity to the development area from SAHRIS

Site ID	Site no	Full Site Name	Site Type	Grading
30618	UMLANDO-A31		Settlement	Grade IIIa
30619	UMLANDO-H17		Settlement	Grade IIIa
30620	UMLANDO-H18		Settlement	Grade IIIa
30621	UMLANDO-H20		Settlement	Grade IIIa
30622	UMLANDO-H20-1		Burial Grounds & Graves	Grade IIIa
30623	UMLANDO-H36		Settlement	Grade IIIa
30627	UMLANDO-LUS02		Burial Grounds & Graves	Grade IIIa
30628	UMLANDO-LUS03		Burial Grounds & Graves	Grade IIIa
30629	UMLANDO-LUS04		Burial Grounds & Graves	Grade IIIa
30630	UMLANDO-LUS05		Burial Grounds & Graves	Grade IIIa
30631	UMLANDO-LUS06		Burial Grounds & Graves	Grade IIIa
30632	UMLANDO-LUS07		Artefacts	Grade IIIc
30633	UMLANDO-LUS08		Burial Grounds & Graves	Grade IIIa
30634	UMLANDO-LUS09		Artefacts	Grade IIIc
30823	UMLANDO-TAWE01		Burial Grounds & Graves	Grade IIIa
30824	UMLANDO-TAWE02		Settlement, Burial Grounds & Graves	Grade IIIa

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30825	UMLANDO-TAWE03		Settlement, Burial Grounds & Graves	Grade IIIa
30826	UMLANDO-TAWE04		Burial Grounds & Graves	Grade IIIa
30827	UMLANDO-TAWE05		Burial Grounds & Graves	Grade IIIa
30828	UMLANDO-TAWE06		Burial Grounds & Graves	Grade IIIa
30829	UMLANDO-TAWE07		Burial Grounds & Graves	Grade IIIa
93216	Ngquza Hill	Ngquza Hill	Place	
135593	DC15/NAMM/0003	Ingquza Hill Massacre, Ramzi, Ramzi	Monuments & Memorials	

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APPENDIX 2

Reference List from SAHRIS

Heritage Impact Assessments				
Nid	Report Type	Author/s	Date	Title
165606	HIA Phase 1	Jenny Bennie	01/04/2014	Heritage Impact Assessment Mngazi River Bridge: SANRAL proposal for new access roads, bridge and stormwater channels
45005	PIA Phase 1	John E Almond	01/11/2011	Recommended exemption from further palaeontological studies: Proposed new police station between Lusikisiki and Flagstaff, O.R. Tambo District Municipality, Eastern Cape
45004	AIA Phase 1	Wouter Fourie	02/12/2011	Proposed construction of a new police station in Lusikisiki, Ingquza Local Municipality, O.R. Tambo District Municipality, Eastern Cape
444	HIA Phase 1	Frans Prins	01/05/2012	CULTURAL HERITAGE IMPACT ASSESSMENT OF THE PROPOSED THOMBO COMMUNITY ACCESS ROADS IN THE PORT ST JOHNS MUNICIPALITY, EASTERN CAPE
305261	HIA Phase 1	Gavin Anderson	01/04/2010	HERITAGE SURVEY OF THE PROPOSED UMGAZI CITRUS PROJECT
156355	HIA Letter of Exemption	Makhosazana Mngomezulu	12/02/2014	APPLICATION FOR EXEMPTION ON THE PROPOSED CONSTRUCTION OF FURTHER EDUCATION TRAINING (FET) COLLEGES IN NGQUNGQUSHE, EASTERN CAPE PROVINCE.
8978	PIA Phase 1	Billy De Klerk	01/01/2002	N2 Wild Coast Toll Road Project, Potential Impacts on Palaeontological Sites

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APPENDIX 3 - Keys/Guides

Key/Guide to Acronyms

AIA	Archaeological Impact Assessment
DARD	Department of Agriculture and Rural Development (KwaZulu-Natal)
DEA	Department of Environmental Affairs (National)
DEADP	Department of Environmental Affairs and Development Planning (Western Cape)
DEDEAT	Department of Economic Development, Environmental Affairs and Tourism (Eastern Cape)
DEDECT	Department of Economic Development, Environment, Conservation and Tourism (North West)
DEDT	Department of Economic Development and Tourism (Mpumalanga)
DEDTEA	Department of economic Development, Tourism and Environmental Affairs (Free State)
DENC	Department of Environment and Nature Conservation (Northern Cape)
DMR	Department of Mineral Resources (National)
GDARD	Gauteng Department of Agriculture and Rural Development (Gauteng)
HIA	Heritage Impact Assessment
LEDET	Department of Economic Development, Environment and Tourism (Limpopo)
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.

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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.

Sites identified and mapped during research projects will also be considered.

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 PALAEOLOGICAL 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

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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:



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- 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.

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