

**LETTER OF EXEMPTION FOR THE GREYLANDS PHASE 2
HOUSING DEVELOPMENT**

FOR WALLACE AND GREEN (PTY) LTD

DATE: 19 MARCH 2022

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Abbreviations

HP	Historical Period
IIA	Indeterminate Iron Age
LIA	Late Iron Age
EIA	Early Iron Age
ISA	Indeterminate Stone Age
ESA	Early Stone Age
MSA	Middle Stone Age
LSA	Late Stone Age
HIA	Heritage Impact Assessment
PIA	Palaeontological Impact Assessment

INTRODUCTION

The site is located along Greylands Road just south of the rail line and an existing residential development, in Tongaat, KZN. Currently there are an estimated 650 units max on the site which are located based on the existing topography which provides a flatter surface toward the centre. Many parts of the site have steep drop-offs into the tributary buffer which cuts through the site.

The proposed development will entail the construction of approximately 769 residential units which is a combination of medium and high density housing, social facilities as well as formalisation of internal roads.

Umlando Was requested to comment on the need for a heritage impact assessment for the proposed Graylands housing project.

Umlando suggested that it be exempt from further heritage assessments since the area is highly disturbed. This exemption excludes the informal cemetery. Figures 1 – 3 show the location of the site.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA

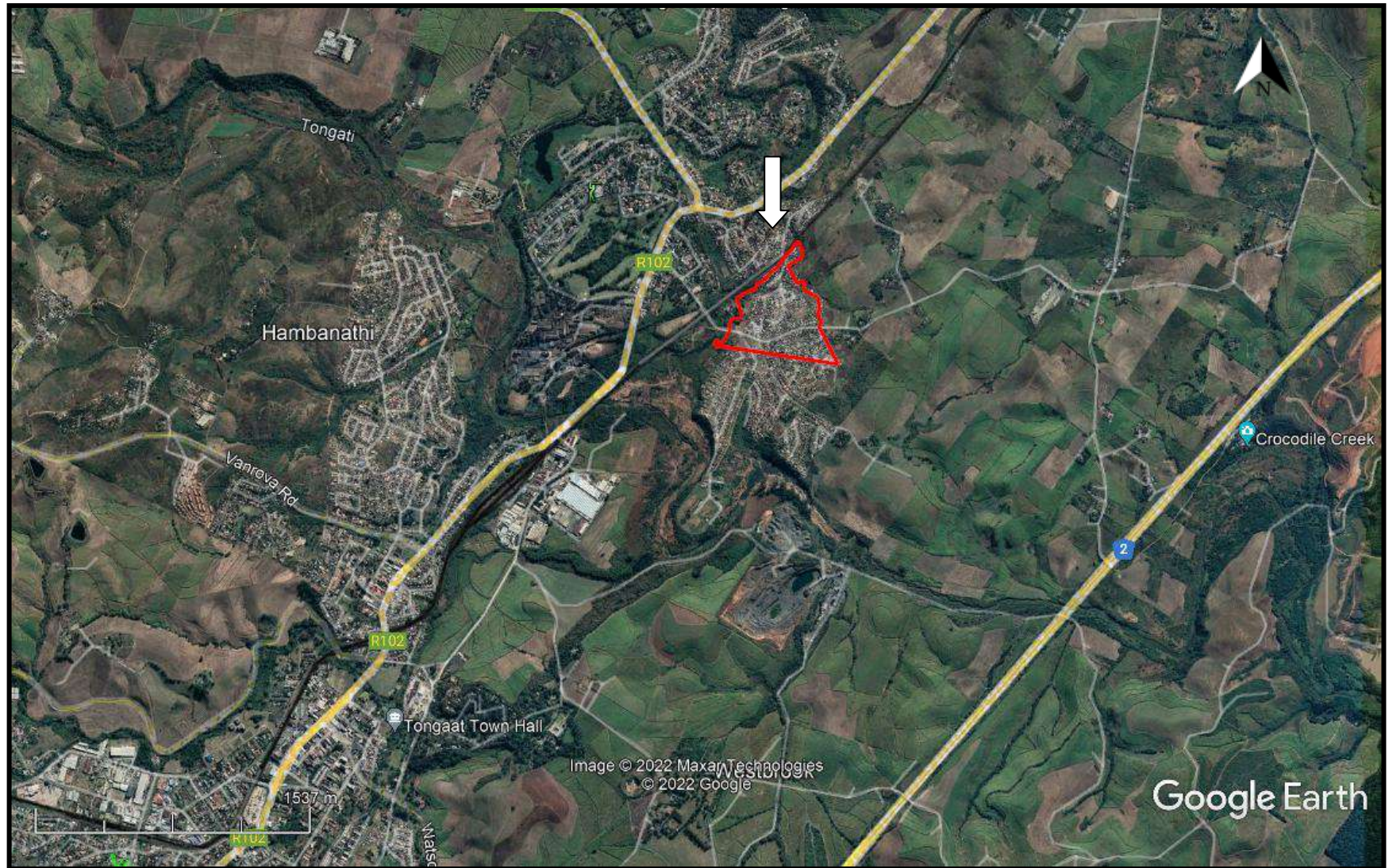


FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA



FIG. 3: TOPOGRAPHICAL OVERVIEW OF THE EASTERN STUDY AREA (1996)

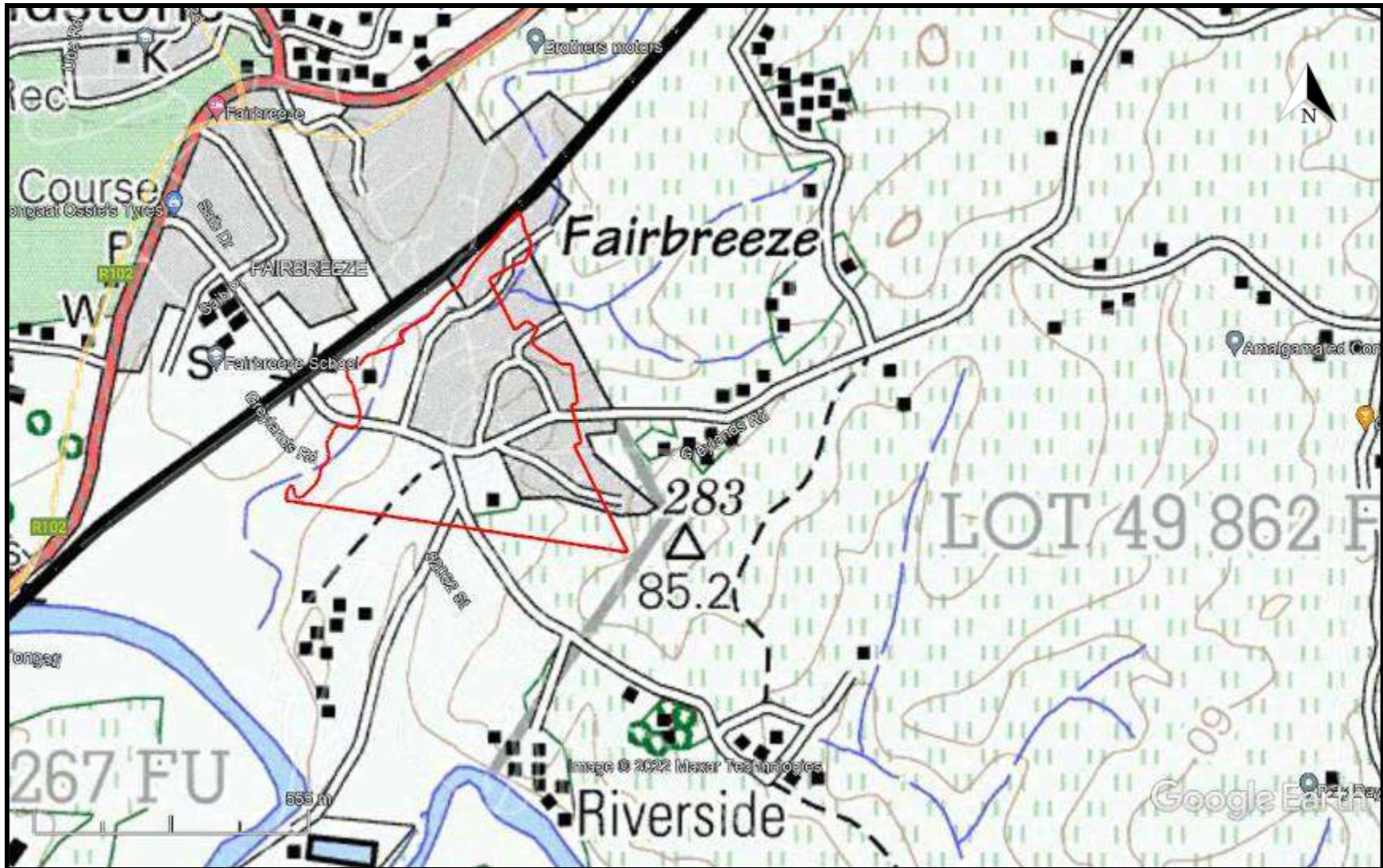


FIG. 4: SCENIC VIEWS OF THE STUDY AREA



The desktop study consisted of analysing various maps for evidence of prior habitation in the study area, as well as for previous archaeological surveys. The archaeological database indicates that there are archaeological sites in the general area (fig. 5).

Part of the study area was surveyed in 1999 by myself as part of the Durban Metro Waste pipelines. The site 2931CA 058 was excavated in 1999 and consisted of an Early Iron Age smelting site.

No national monuments, battlefields, or historical cemeteries are known to occur in the study area.

The 1937 topographical map indicates that there are two farm buildings within the study area (fig. 6). These buildings, and a few more, occur on the 1942 topographical map (fig. 7). These buildings no longer exist (fig. 2).

An informal cemetery was noted by the wetland specialist during conversations with a local community member. Figures 8 & 9 indicate the site. A 20m buffer should be placed around the edges of the informal cemetery in case there are subsurface graves. The local community needs to confirm the boundary as well.

The study area is mostly of medium to high palaeontological sensitivity (fig. 10). However, the development will not extend beyond 2m in depth where unweathered palaeontological material might exist. A Chance Find Protocol should be part of the EMP.

The heritage desktop study suggests that no further mitigation should be required for this development. Any of the original buildings have been demolished as can be seen on the Google Earth imagery.

FIG. 5: LOCATION OF KNOWN HERITAGE SITES NEAR THE STUDY AREA

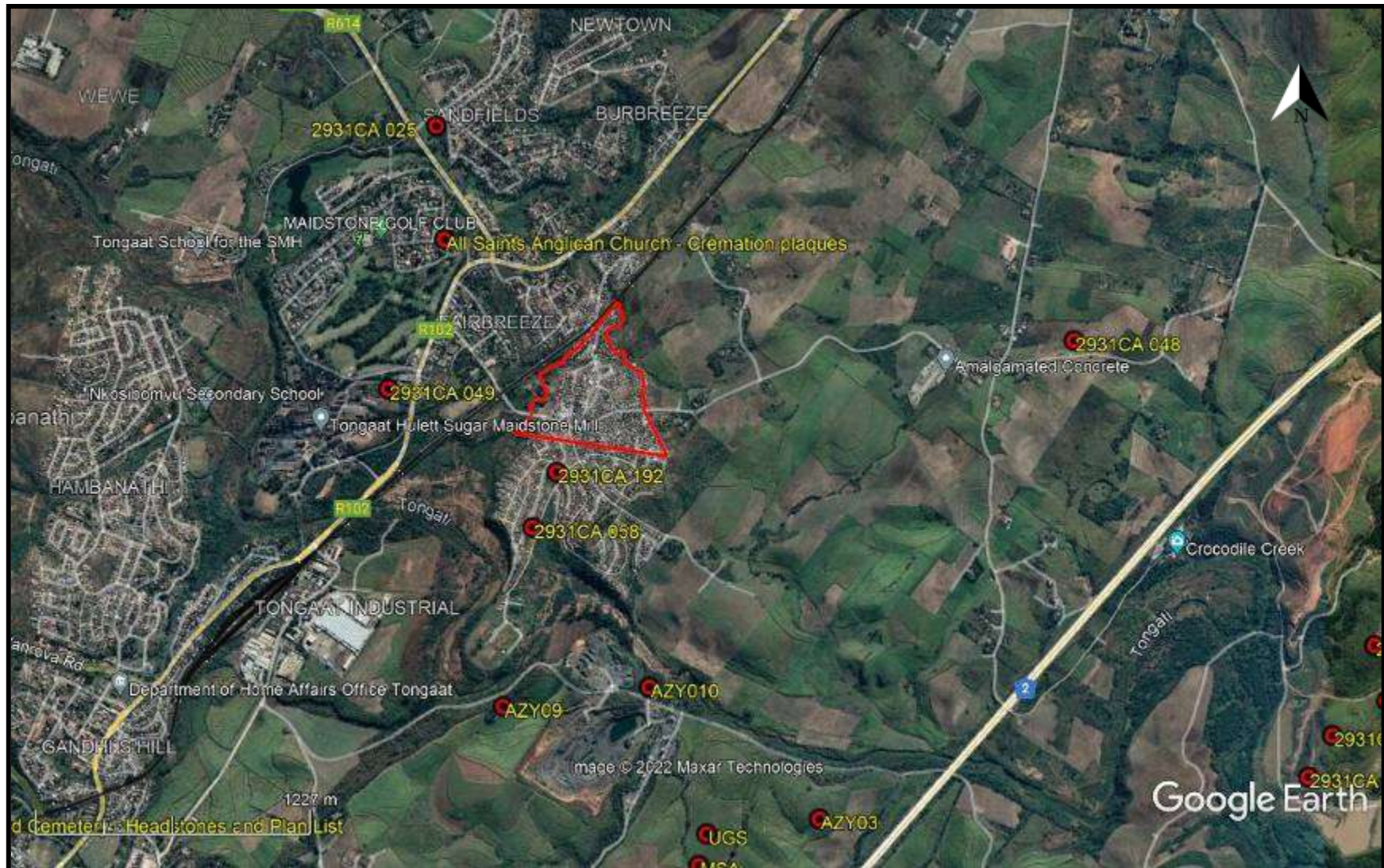


FIG. 6: STUDY AREA IN 1937



FIG. 7: LOCATION OF THE STUDY AREA IN 1942

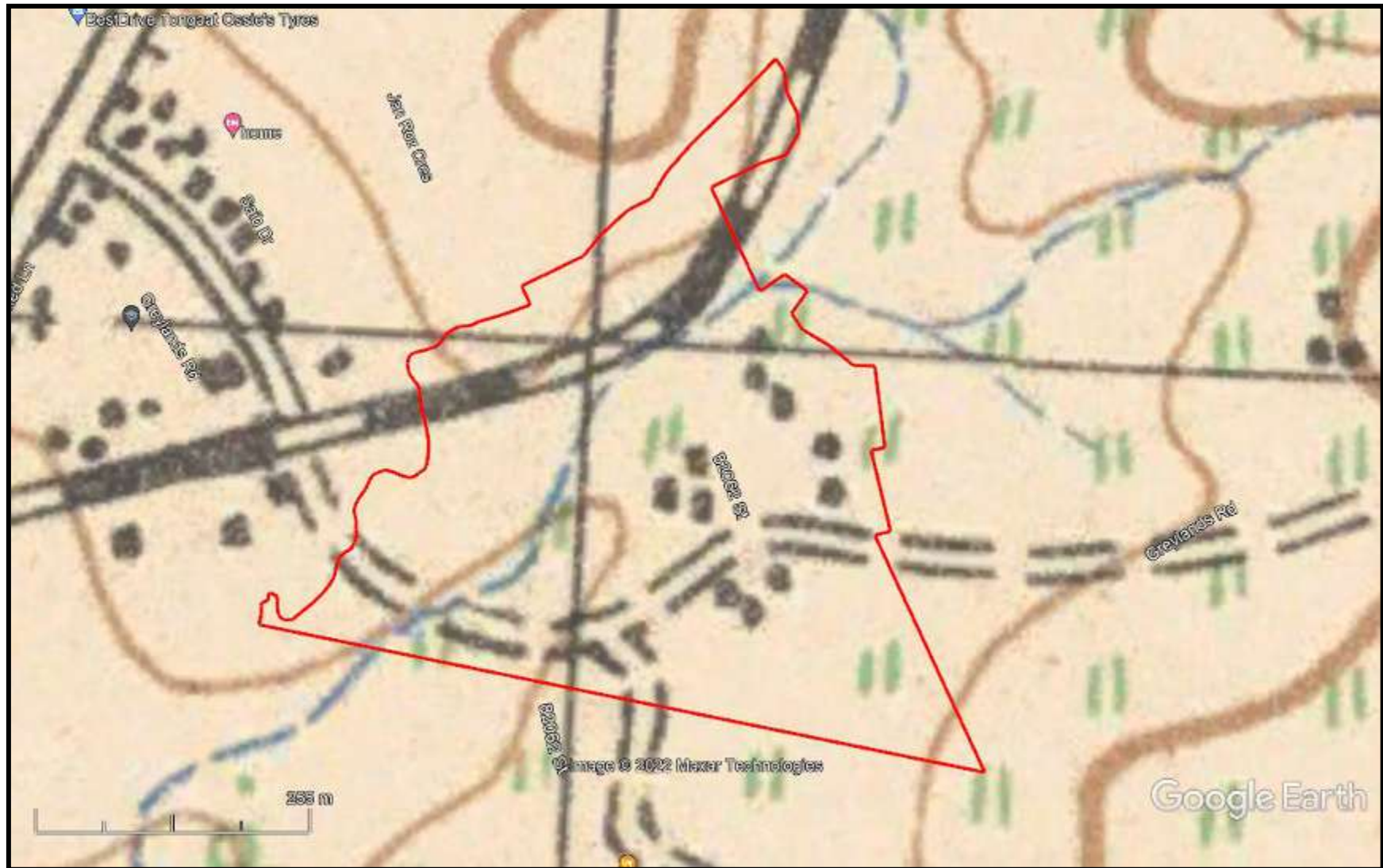


FIG. 8: LOCATION OF CEMETERY IN THE STUDY AREA

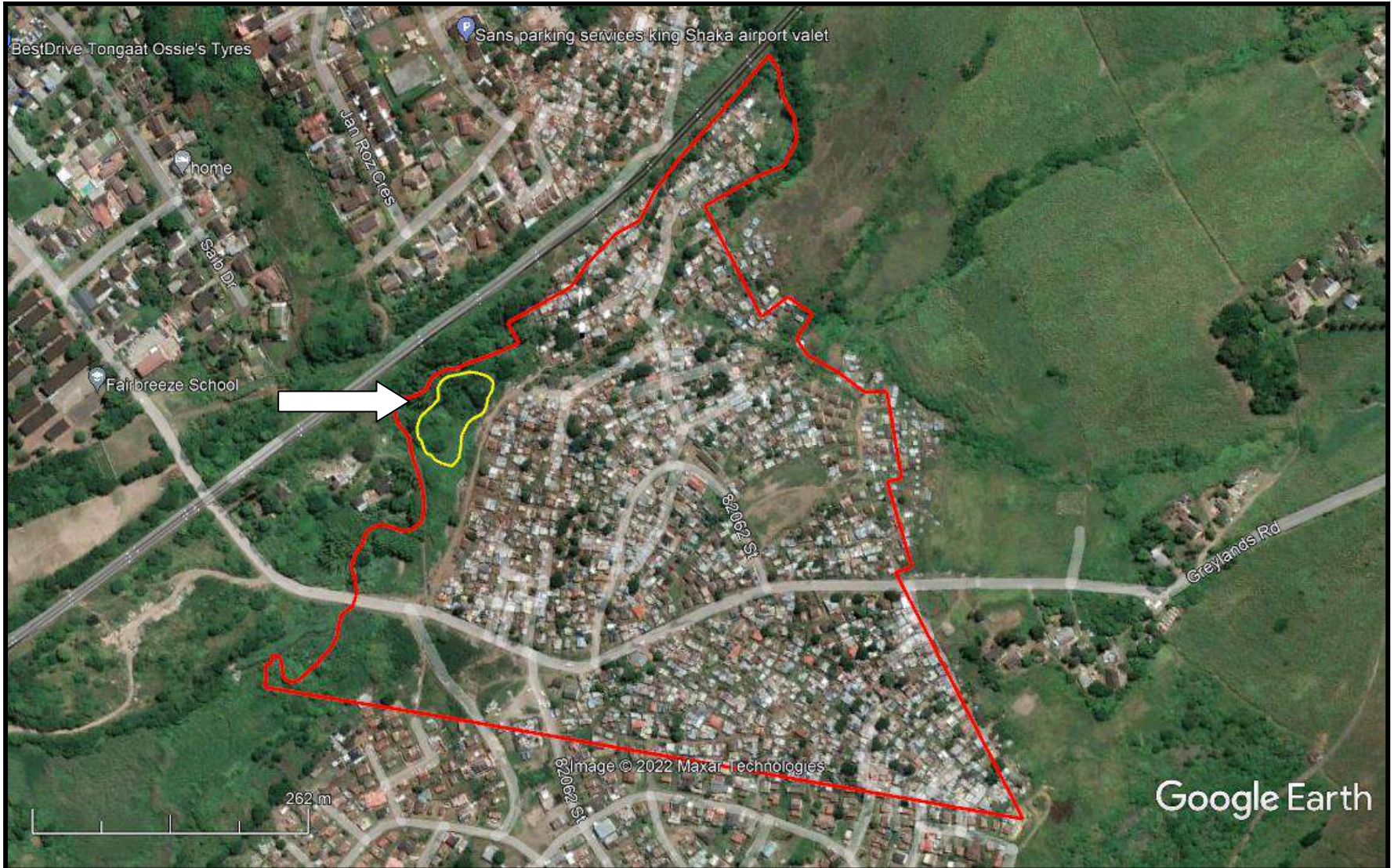
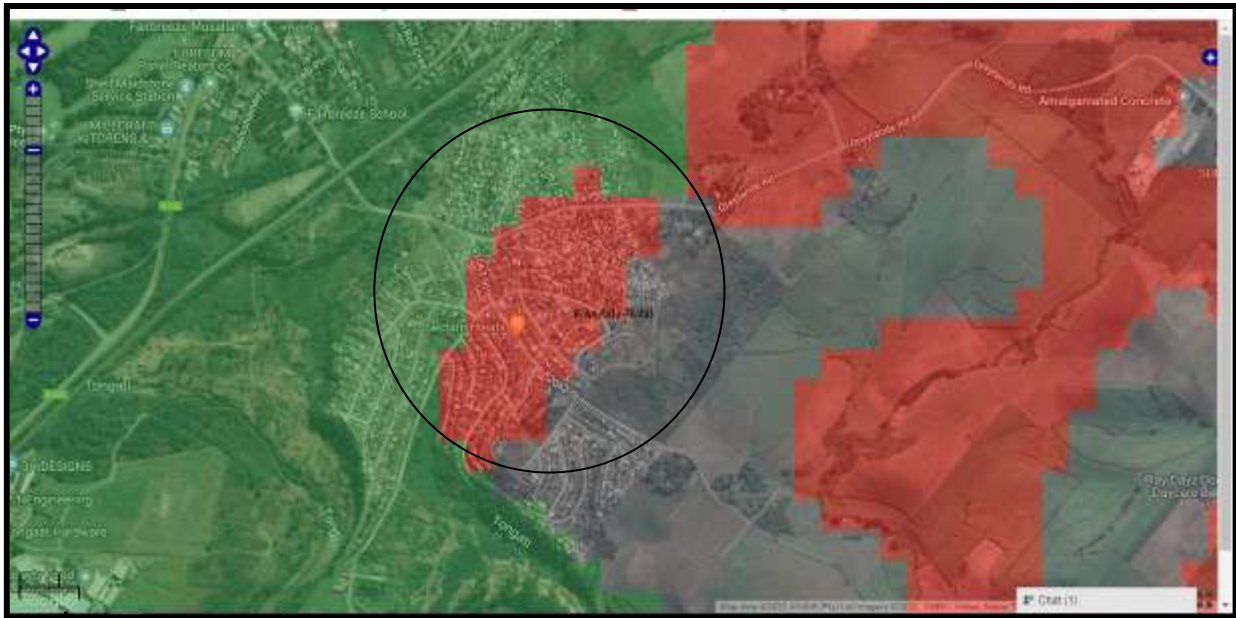


FIG. 9: INFORMAL CEMETERY IN THE STUDY AREA



FIG. 10: PALAEOLOGICAL SENSITIVITY

COLOUR	SENSITIVITY	REQUIRED ACTION
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	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

CONCLUSION

The heritage desktop study suggests that no further mitigation should be required for this development, with the exclusion of the informal cemetery. Any old buildings that originally existed have been demolished as can be seen on the Google Earth imagery. The informal cemetery should have a 20m buffer in case there are subsurface graves. This buffer for the cemetery should be confirmed by the community.

The area has been highly disturbed and it is not expected to affect any unweathered fossiliferous layers.

REFERENCES

117B_050_36506

2931CA Verulam 1942, 2000

Anderson, G. 1999. Archaeological Excavations at the Tongaat Sewer Extension Site. Report for Durban Metro Waste Management.

EXPERIENCE OF THE HERITAGE CONSULTANT

Gavin Anderson has a M. Phil (in archaeology and social psychology) degree from the University of Cape Town. Gavin has been working as a professional archaeologist and heritage impact assessor since 1995. He joined the Association of Professional Archaeologists of Southern Africa in 1998 when it was formed. Gavin is rated as a Principle Investigator with expertise status in Rock Art, Stone Age and Iron Age studies. In addition to this, he was worked on both West and East Coast shell middens, Anglo-Boer War sites, and Historical Period sites.

DECLARATION OF INDEPENDENCE

I, Gavin Anderson, declare that I am an independent specialist consultant and have no financial, personal or other interest in the proposed development, nor the developers or any of their subsidiaries, apart from fair remuneration for work performed in the delivery of heritage assessment services. There are no circumstances that compromise the objectivity of my performing such work.

A handwritten signature in black ink, appearing to read 'Gavin Anderson', with a horizontal line underneath.

Gavin Anderson
Archaeologist/Heritage Impact Assessor