CULTURAL HERITAGE IMPACT ASSESSMENT OF THE AMMENDED PROPOSED VULINDLELA BULK WATER SUPPLY SCHEME, UMGENI MUNICIPALITY.



ACTIVE HERITAGE cc.

For: KSEMS

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LIST OF ABBREVIATIONS AND ACRONYMS

EIA	Early Iron Age
ESA	Early Stone Age
HISTORIC PERIOD	Since the arrival of the white settlers - c. AD 1820 in this part of the country
IRON AGE	Early Iron Age AD 200 - AD 1000 Late Iron Age AD 1000 - AD 1830
LIA	Late Iron Age
LSA	Late Stone Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998 and associated regulations (2006).
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999) and associated regulations (2000)
SAHRA	South African Heritage Resources Agency
STONE AGE	Early Stone Age 2 000 000 - 250 000 BP Middle Stone Age 250 000 - 25 000 BP Late Stone Age 30 000 - until c. AD 200

EXECUTIVE SUMMARY

A cultural heritage survey of the proposed amendment of the Vulindlela Bulk Water Supply Scheme, Umgeni Municipality identified only one heritage site within 50m from the proposed pipeline trajectory. This site is the locally well-known Mpophomeni Cemetery. It is recommended that the developers maintain a buffer of at least 8m at the north eastern boundary of this heritage site. It is also suggested that the developers erect a sturdy fence with an entrance gate on the north eastern side of the Cemetery prior to any excavation process. There is no known reason, from a heritage perspective, why the upgrade may not proceed for the rest of the proposed pipeline as planned. It is the opinion of the consultant that both alternative routes are equally suitable for development from a heritage perspective. However, attention is drawn to the South African Heritage Resources Act, 1999 (Act No. 25 of 1999) and the KwaZulu-Natal Heritage Act (Act no 4 of 2008) which, requires that operations that expose archaeological or historical remains should cease immediately, pending evaluation by the provincial heritage agency.

1 BACKGROUND INFORMATION ON THE PROJECT

Consultant:	Frans Prins (Active Heritage cc) for KSEMS
Type of development:	Umgeni Water proposes to implement Vulindlela Infrastructure Pipeline within the uMgeni municipality. The infrastructure is expected to address the water supply challenges within these municipalities. The pipeline infrastructure will potentially involve the construction of; new reservoirs, new pump station, new pipeline and the upgrading of existing pipework and existing pump stations.
	The original pipeline route, as reported in Prins (2016 and 2017) has been altered by the engineers. Two alternative routes has now been proposed. The more direct route, through the intermediate reservoir on the ridge at elevation 1260, is the preferred one. The booster pump station will most probably be at Site B, located below reservoir 2. This is as close as we can get to the final alignment at this stage."
	The preferred route shows the water pipeline to the west of the main road up to the army camp. This alignment has less obstructions and more space. However sewage may also be pumped from Mpophomeni to Howick WWTW along the west side of the main road. Therefore the water pipeline may have to

Table 1. Background information

	be moved to the east side of the road to accommodate the proposed sewer rising main on the western side.
Rezoning or subdivision:	n.a
Terms of reference	To carry out a Heritage Impact Assessment
Legislative requirements:	The Heritage Impact Assessment was carried out in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and following the requirements of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) and the KwaZulu-Natal Heritage Act, 1997 (Act No. 4 of 2008)

1.1. Details of the area surveyed:

The proposed pipeline development starts in Howick (near the eastern boundary of Midmar Dam) and then runs broadly parallel to the R617 in a southern direction towards Mpophomeni (Figs 1 & 5). Two alternative routes have been identified. The more direct route (marked in blue), through the intermediate reservoir on the ridge at elevation 1260m, is the preferred one. The booster pump station will most probably be at Site B, located below Reservoir 2. The preferred route shows the water pipeline to the west of the main road up to the army camp and past the Howick Airfield (Fig 6). This alignment has less obstructions and more space. However sewage may also be pumped from Mpophomeni to Howick WWTW along the west side of the main road. Therefore the water pipeline may have to be moved to the east side of the road to accommodate the proposed sewer rising main on the western side. The alternative route (marked in red) runs closer to Mpophomeni (Figs 1 & 7) but later joins up with the preferred route near the Mpophomeni Cemetery (Figs 1 & 12).

2 BACKGROUND TO HERITAGE RESOURCES OF THE AREA

The greater Mpophomeni area is relatively well recorded in terms of archaeological site distribution. Some sites have been recorded by cultural resource consultants who have worked in the area whilst archaeologists from the KwaZulu-Natal Museum have made sporadic visits to the area over a period of three decades. The available evidence, as captured in the KwaZulu-Natal Museum heritage site inventories, indicates that the greater Mpophomeni area (including Howick and Merrivale) contains a wide spectrum of archaeological sites covering different time-periods and cultural traditions. These include one Early Stone Age site, four Middle Stone Age sites, twenty Later Stone Age sites, two rock painting sites, eight Later Iron Age sites, and numerous historical sites

dating back to the colonial period. Some of the farms in the area contain graves and structures relating to early Voortrekker settlement, however, the majority of older buildings on farmsteads were erected by British colonists after 1850 (Bizley & McKenzie 2007). These are also protected by heritage legislation (Derwent 2006). The name Drie Fonteinen was the original Dutch farm name given to the study area by early Voortrekker Settlers. However, after 1880 the farm was incorporated into the bigger Howick town administrative area. An old Victorian era building, that is situated near the western section of Mpophomeni (Fig 9) has been renovated and forms the main complex of the newly established Mpophomeni Museum (Fig 10).

Most of the Stone Age sites in the area occur in open air contexts as exposed by donga and sheet erosion. Some Middle Stone Age flakes, probably dating back to ca. 40 000 – 200 000 years ago, occur in disturbed context in dongas and road cuttings. The majority of Later Stone Age sites as well as rock art sites occur further west in the adjacent area of Nottingham Road. These typically occur in small shelters in the sandstone formations of leading up to the Drakensberg.

The San were the owners of the land for almost 30 000 years but the local demography started to change soon after 2000 years ago when the first Bantu-speaking farmers crossed the Limpopo River and arrived in South Africa. Around 800 years ago, if not earlier, Bantu-speaking farmers also settled in the Umgeni River Valley adjacent to Howick area. These early Nguni-speakers settlements have been called Moor Park after the type site near Estcourt (Huffman 2007). Later Iron Age settlement spread rapidly through the valley and eventually also spread on to the higher altitude areas around Howick and the Karkloof areas. Many of these sites date back to the 18th and early 19th centuries (ibid). Although the majority of sites constructed by these African farmers consisted of stone walling not all of them were made from stone. Sites located in the Dargle and Karkloof Valley areas also show that many settlements just consisted of wattle and daub structures. These Later Iron Age sites were most probably inhabited by Nguni-speaking groups such as the Wushe and related groups (Bryant 1965). The Wushe was known to be excellent metal workers and it is not surprising that some archaeological evidence for early metal working has been found in the Karkloof, Nottingham road, and Dargle areas. However, by 1820 the Wushe was dispersed from this area due to the expansionistic policies of the Zulu Kingdom of King Shaka. African refugee groups and individuals were given permission to settle in the area by the British colonial authorities after 1845 where most of them became farm labourers.

After the Anglo-Zulu war of 1879 and the Bambatha Rebellion of 1911 many of the African people in the study area adopted a Zulu ethnic identity.

The area was also a focal point during the more recent struggle history of South Africa. Nelson Mandela was arrested on the 5th of August 1962 just outside Howick. This historical occurrence was pivotal in the liberation struggle in South Africa. More recently a monument has been erected at the capture site and it is in the process of obtaining provincial monument status. The Mpophomeni Township, that is situated directly

adjacent to the footprint, also saw various protest marches against the Apartheid regime as well as conflict between ANC and Inkatha Freedom Party supporters in the 1980's and early 1990's. Sites belonging to this period also have heritage value, however, more archival and oral history-type research is needed to identify the relevant areas.

3 BACKGROUND INFORMATION OF THE SURVEY

3.1 Methodology

A desktop study was conducted of the archaeological databases housed in the KwaZulu-Natal Museum and relevant aerial photographs. The SAHRIS website was consulted for data relating to the distribution and significance of heritage sites in the greater project area. In addition, the available heritage literature covering the study area was also consulted.

A ground survey, following standard and accepted archaeological procedures, was conducted on 18 April 2018. The survey included a buffer of 50m around the proposed pipeline development. The consultant spoke to various community members during the survey (Fig 13). None of them were aware of any heritage sites in the near vicinity of the proposed pipelines apart from the local Mpophomeni Cemetery.

3.2 Restrictions encountered during the survey

3.2.1 Visibility

Visibility was good.

3.2.2 Disturbance

No disturbance of any potential heritage features was noted.

3.3 Details of equipment used in the survey

GPS: Garmin Etrek Digital cameras: Canon Powershot A460 All readings were taken using the GPS. Accuracy was to a level of 5 m.

4 DESCRIPTION OF SITES AND MATERIAL OBSERVED

4.1 Locational data

Province: KwaZulu-Natal Towns: Howick, Mpophomeni Municipality: Umgeni Municipality

4.2 Overview of potential heritage resources in the project area

Given the high altitude of approximately 1000m - 1260m above sea level it can be expected that no Early Iron Age sites would occur in the project area as these sites are typically associated with altitudes below 800m above sea level. Although Later Stone Age Sites do occur in the KZN Midlands they are relatively scarce and the absence of any shelter or sandstone outcrops in the area would mitigate for their probable absence in the area. Middle and Early Stone Age open air sites do occur in similar environments and there is a possibility that these archaeological sites may occur in the project area. The area was also occupied by Later Iron Age communities during the historical period - if not before. Unfortunately Later Iron Age communities in this part of KwaZulu-Natal used less durable materials to build their settlements and the remains of such is not always visible. During the period of the Natal Colonial administration (mid 1800's) the authorities settled many Zulu-speaking communities near Vulindlela and the areas directly adjacent to the project area. It is highly probable the remains of their settlements and associated graves may occur in the area. The project area also saw conflict between supporters of the ANC and the Inkatha Freedom Party in the period immediately preceding the first democratic elections in South Africa in 1994. It is therefore possible that such 'Struggle-era Sites' or features may be found in the project area.

4.3 Ground Survey Results

The desktop study do not indicate any archaeological sites within 1km from the proposed pipeline routes (Figs 1 - 3). No sites associated with the recent 'Struggle Era' occur in close proximity of the proposed pipeline. The area is also not part of any known cultural landscape.

However, an old historical building that dates back to the late 19th century is situated approximately 250 m to the west of the Alternative Route proposed. This building is presently being transformed into the newly established Mpophomeni Museum (Figs 9 & 10). As this heritage site is situated more the 50m form the proposed pipeline no

mitigation is needed (Table 2). The building is not threatened by the proposed development.

The only heritage site that may be threatened by the proposed development is the Mpophomeni Cemetery. This is a semi-formal Cemetery situated near the meeting point of the two alternative pipeline routes (Figs 2 & 4). In fact, the preferred Route runs parallel to a dirt road on the north eastern side of the Cemetery and within 10m - 20m from its border with the Cemetery (Figs 11 & 12). It would not be possible to alter the trajectory of the proposed pipeline at this point. It is therefore recommended that the developers maintain a buffer of at least 8m from the border of the Cemetery. In addition, it is suggested that the developers erect a study fence with an entrance gate at the north eastern side of the Cemetery prior to any excavation work (Table 2).

	Site	Brief	Rating	Mitigation	GPS Coordinates	
	Category	description		_		
1	Historical Building	Historical Building with Victorian or Edwardian features. Most probably built during the end of the 19thy century. It is presently being developed into the newly established Mpophomeni Museum.	The building is older than 60 years and appears to be have been constructed at the end of the 19 th century. It is of local historical significance. It is rated as locally important (Table 4) and is protected by Provincial Heritage legislation	Thebuildingcomplexissituatedapproximately 250m to the west oftheAlternativePipelineTrajectory. It is notthreatened by theproposeddevelopment.Nomitigationisnecessary.	S 29º 33' 45.59" E 30º 11' 09.81"	
2	2Mpophomeni CemeteryAsemi- structured Cemetery covering an area of approximately 370m x 250m. It contains a couple of hundred graves most of whom are younger than 60		All Cemeteries and graves, including those younger than 60 years old, are protected by heritage legislation. It is rated as locally important (Table 4) and should	Due to the local topography and infrastructure in the immediate vicinity of the Cemetery it would only be possible to maintain a buffer zone of approximately 8m around it. It is also	S 29º 35' 06.51" E 30º 12' 18.77"	

Table 2. Heritage Sites located during the ground survey (excluding paleontology)

	years old.	not be disturbed	recommended that	
	Although divided	or altered under	the developers	
	in blocks the	any	erect a sturdy	
	Cemetery	circumstances.	fence with an	
	appears un-kept		entrance gate on	
	and it is		the north western	
	expanding		section of the	
	organically. It is		Cemetery (the	
	not fenced in and		area closest to the	
	access is open to		proposed	
	all graves.		pipeline).	
			Alternatively	
			motivate for a	
			second phase	
			heritage impact	
			assessment, by a	
			grave relocation	
			expert. A	
			comprehensive	
			community	
			consultation	
			process will have	
			to be initiated to	
			arrange for	
			potential grave	
			exhumation and	
			reburial (Appendix	
			1).	
·				

Table 3.	Evaluation	of	heritage	sites	within	50 m	from	proposed	pipeline
(excluding	paleontolog	y)							

	Significance criteria in terms of Section 3(3) of the NHRA							
	Rating							
1.	1. Historic and political significance - The importance of the cultural heritage in the community or pattern of South Africa's history.							
2.	Scientific significance – Possession of uncommon, rare or endangered aspects of South Africa's cultural heritage.	None.						
3.	Research/scientific significance – Potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage.	None.						
4.	4. Scientific significance – Importance in demonstrating the principal characteristics of a particular class of South Africa's cultural places/objects.							
5.	5. Aesthetic significance – Importance in exhibiting particular aesthetic characteristics valued by a community or cultural group.							
6.	 Scientific significance – Importance in demonstrating a high degree of creative or technical achievement at a particular period. 							
7.	Social significance – Strong or special association with a particular community or cultural group for social, cultu-ral or spiritual reasons.	Yes, the local Cemetery is of local significance.						
8.	Historic significance – Strong or special association with the life and work of a person, group or organization of importance in the history of South Africa.	None.						
9.	The significance of the site relating to the history of slavery in South Africa.	None.						

5 HERITAGE SITE DESCRIPTION AND STATEMENT OF SIGNIFICANCE (HERITAGE VALUE)

5.1 Field Rating

Only one heritage site occurs within 50m from the proposed pipeline trajectory. This Cemetery is rated as Local Grade 111A. It is considered to be of high significance locally. The site should be mitigated, and part retained as a heritage site – should need be (Table 4).

Level	Details	Action			
National (Grade I)	The site is considered to be of National Significance	Nominated to be declared by SAHRA			
Provincial (Grade II)	This site is considered to be of Provincial significance	Nominated to be declared by Provincial Heritage Authority			
Local Grade IIIA	This site is considered to be of HIGH significance locally	The site should be retained as a heritage site			
Local Grade IIIB	This site is considered to be of HIGH significance locally	The site should be mitigated, and part retained as a heritage site			
Generally Protected A	High to medium significance	Mitigation necessary before destruction			
Generally Protected B	Medium significance	The site needs to be recorded before destruction			
Generally Protected C	Low significance	No further recording is required before destruction			

Table 4. Field rating and recommended grading of sites (SAHRA 2005)

6 PALEONTOLOGY DESKTOP EVALUATION

A paleontological desktop evaluation was conducted by an analysis of the SAHRIS 'fossil sensitivity map'. The results indicates that the greater section of the proposed pipeline trajectory, alternatives 1 and 2, transverse areas with a high paleontological sensitivity (indicated by the colour yellow). The extreme southern and south eastern sections of the proposed pipeline trajectory transverse areas with a very high paleontological sensitivity (indicated by the colour red) (Fig 14). A desktop assessment by a qualified palaeontologist is required for the areas with a high paleontological sensitivity whilst a systematic ground survey will be required for the areas with a very high paleontological sensitivity.

7 RECOMMENDATIONS

It is the opinion of the consultant that both alternative routes considered are equally suitable for the proposed pipeline development from a general heritage point of view (excluding paleontology). The construction of the proposed Vulindlela Bulk Water Supply Scheme may proceed under the following conditions:

- Maintain a buffer of at least 8m around the north eastern boundary of the Mpophomeni Cemetery.
- It is also recommended that the developers erect a sturdy fence and an entrance gate at the north eastern boundary of the Mpophomeni Cemetery prior to any excavation in the area.
- Should this not be possible then the developers may consider a phase two heritage impact assessment including a grave relocation process. The process relating to potential grave relocation is outlined in Appendix 1.
- An Amafa accredited palaeontologist must conduct a desktop study of the northern and central sections of the proposed pipeline trajectory. A systematic ground survey is required for the extreme southern and south eastern sections of the pipeline trajectory.
- It is important to point that the KwaZulu-Natal Heritage Act requires that all operations exposing graves as well as archaeological and historical residues as well as fossils should cease immediately pending an evaluation by the heritage authorities.

8 MAPS AND FIGURES

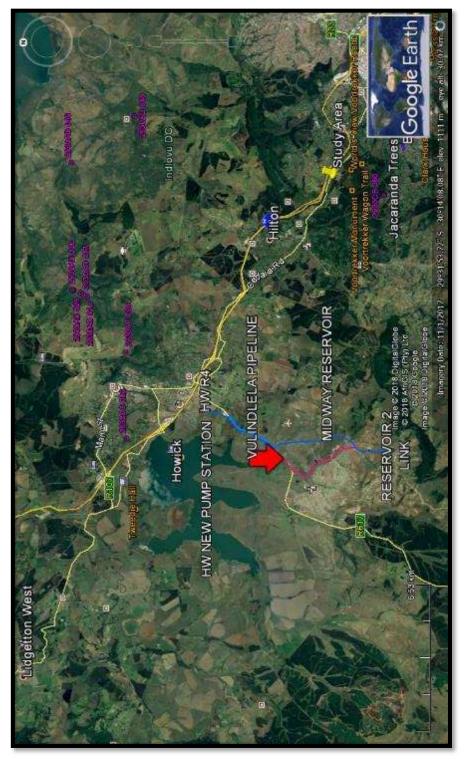


Figure 1. Google Aerial map showing the location of the proposed Vulindlela Pipeline project (latest alterations). The purple markers indicate known archaeological sites in the area. The yellow markers indicate known historical sites in the area. None of these occur closer than 50m to the proposed development.

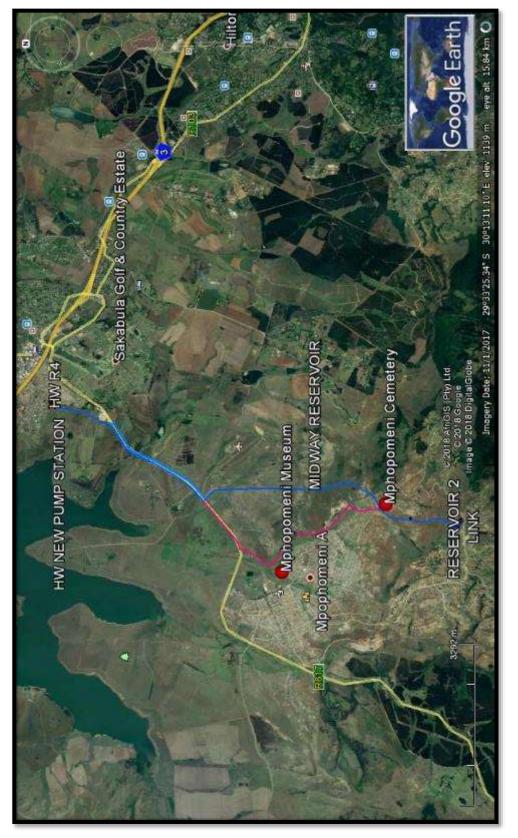


Figure 2. Google Earth Imagery showing the location of the Mpophomeni Cemetery and Museum relative to the proposed pipeline routes.

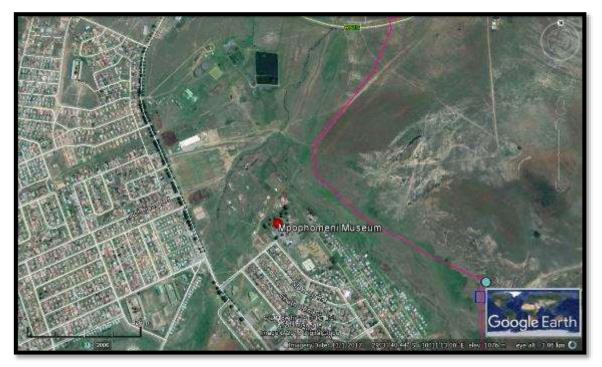


Figure 3. Google Earth Imagery showing the location of the Mpophomeni Museum Complex relative to the proposed pipeline (alternative route).



Figure 4. Google Earth Imagery showing the location of the Mpophomeni Cemetery relative to the proposed pipeline trajectories. The preferred pipeline trajectory (in blue) runs within 15m past the north eastern border of the Cemetery.



Figure 5. Start of the proposed preferred route near the new pump station to the east of Midmar Dam. No heritage sites occur in this area.



Figure 6. Trajectory of the preferred pipeline route past the Howick Airfield. No heritage sites occur along this stretch.



Figure 7. Trajectory of the alternative pipeline route – almost directly along the northern border of the Mpophomeni Township. No heritage sites occur along this stretch.



Figure 8. All the residential buildings in the near vicinity of the pipeline trajectories are younger than 60 years old and have no heritage value.



Figure 9. Old Victorian building presently being developed into the Mpophomeni Museum. This building is situated more than 200m to the east of the proposed pipeline trajectory (alternative route) and it is not threatened by the proposed development.



Figure 10. Entrance to the New Mpophomeni Museum Complex.



Figure 11. The Mpophomeni Cemetery near the meeting point of the two pipeline trajectory options.



Figure 12. The proposed pipeline trajectory runs within 8m from the north eastern part of the Of the Cemetery all along the existing dirt road.



Figure 13. Jackson Mthembu, a local community member, assisted the consultant with the identification of graves and other potential heritage resources in the study area.

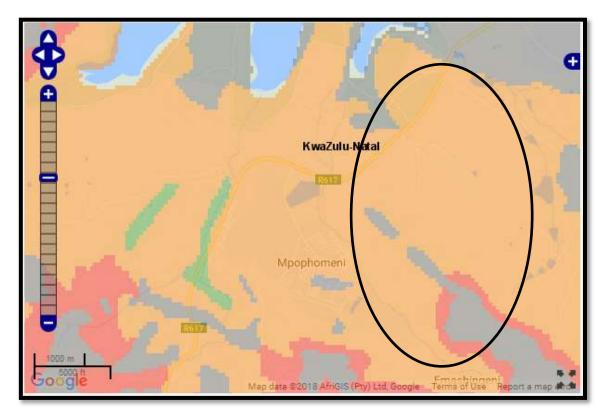


Figure 14. Fossil Sensitivity Map: the polygon indicates the project area. A high paleosensitivity is indicated by the areas covered in yellow. A very high paleosensitivity is indicated by the areas covered in red.

8 REFERENCES

Bryant, A. T. 1965. Olden times in Zululand and Natal. Cape Town: C. Struik.

Derwent, S. 2006. *KwaZulu-Natal Heritage Sites: A Guide to Some Great Places*. David Philip: Pietermaritzburg.

Huffman, T. N. 2007. *Handbook to the Iron Age: The Archaeology of Pre-colonial Farming Societies in Southern Africa*. University of KwaZulu-Natal Press. Pietermaritzburg.

Laband, J & Haswell, R. (Eds). 1988. Pietermaritzburg, 1838-1988: A New Portrait of an African City. University of Natal Press: Shuter & Shooter

Maggs, T. 1988. Pietermaritzburg: the first 2 000 000 years. In Laband, J and Hasswell, R. (eds). *Pietermaritzburg 1838 – 1988: A New Portrait of an African City*. pg 14-17. University of Natal Press: Pietermaritzburg

Maggs, T. The Iron Age farming communities. In Duminy, A. and Guest, B. 1989. *Natal and Zululand: from Earliest Times to 1910. A New History*. Pg. 28-46. University of Natal Press. Pietermaritzburg.

Martin, B. 1988. The coming of the railway to Pietermaritzburg. In . In Laband, J & Haswell, R. (Eds). *Pietermaritzburg, 1838-1988: A New Portrait of an African City.* University of Natal Press: Shuter & Shooter.

Oberholster, J. J. 1972. *The Historical Monuments of South Africa*. The Rembrandt Van Rijn Foundation for Culture. Cape Town.

Prins, F. E. 2016. *Cultural Heritage Impact Assessment of the Proposed Vulindlela Bulk Water Supply Scheme, Umgeni And Msunduzi Municipalities.* Unpublished Report for Kerry Seppings Environmental Consultants.

SAHRA, 2005. *Minimum Standards for the Archaeological and the Palaeontological Components of Impact Assessment Reports, Draft version 1.4.*

Wright, J. 1988. Before Mgungundlovu: the upper Mngeni and upper Mkhomazi region in the early nineteenth century. In Laband, J & Haswell, R. (Eds). *Pietermaritzburg, 1838-1988: A New Portrait of an African City.* University of Natal Press: Shuter & Shooter

APPENDIX 1: GRAVE RELOCATION PLAN

Burial grounds and graves older than 60 years are dealt with in Article 36 of the NHR Act, no 25 of 1999. However, all graves are protected by the provincial heritage legislation of KwaZulu-Natal. The Human Tissues Act (65 of 1983) also protects graves younger than 60 years. These fall under the jurisdiction of the National Department of Health and the Provincial Health Departments. Approval for the exhumation and reburial must be obtained from the relevant Provincial MEC as well as the relevant Local Authorities.

Below follows a broad summary of how to deal with grave in the event of proposed development.

 \Box If the graves are younger than 60 years, an undertaker can be contracted to deal with the exhumation and reburial. This will include public participation, organising cemeteries, coffins, etc. They need permits and have their own requirements that must be adhered to.

 \Box If the graves are older than 60 years old or of undetermined age, an archaeologist must be in attendance to assist with the exhumation and documentation of the graves. This is a requirement by law.

Once it has been decided to relocate particular graves, the following steps should be taken:

□ Notices of the intention to relocate the graves need to be put up at the burial site for a period of 60 days. This should contain information where communities and family members can contact the developer/archaeologist/public-relations officer/undertaker. All information pertaining to the identification of the graves needs to be documented for the application of a SAHRA permit. The notices need to be in at least 3 languages, English, and two other languages. This is a requirement by law.

□ Notices of the intention needs to be placed in at least two local newspapers and have the same information as the above point. This is a requirement by law.

□ Local radio stations can also be used to try contact family members. This is not required by law, but is helpful in trying to contact family members.

 \Box During this time (60 days) a suitable cemetery need to be identified close to the development area or otherwise one specified by the family of the deceased.

 \Box An open day for family members should be arranged after the period of 60 days so that they can gather to discuss the way forward, and to sort out any problems. The developer needs to take the families requirements into account. This is a requirement by law.

□ Once the 60 days has passed and all the information from the family members have been received, a permit can be requested from SAHRA. This is a requirement by law.

□ Once the permit has been received, the graves may be exhumed and relocated.

 \Box All headstones must be relocated with the graves as well as any items found in the grave