

**A DESKTOP HERITAGE IMPACT ASSESSMENT
(INCLUDING A PHASE 1 PALEONTOLOGICAL
ASSESSMENT) OF THE PROPOSED CEMENT
GRINDING MILL, ON REMAINDER OF PORTION
2108 OF UMLAZI NATIVE LOCATION NO 4676,
UMBOGINTWINI, ETHEKWINI MUNICIPALITY.**



ACTIVE HERITAGE cc.

For: Mondli Consulting Service

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Frans received his MA (Archaeology) from the University of Stellenbosch and is presently a PhD candidate on social anthropology at UKZN. His PhD research topic deals with indigenous San perceptions and interactions with the rock art heritage of the Drakensberg.

Frans was employed as a junior research associate at the then University of Transkei, Botany Department in 1988-1990. Although attached to a Botany Department he conducted a palaeoecological study on the Iron Age of northern Transkei - this study formed the basis for his MA thesis in Archaeology. Frans left the University of Transkei to accept a junior lecturing position at the University of Stellenbosch in 1990. He taught mostly undergraduate courses on World Archaeology and research methodology during this period.

From 1991 – 2001 Frans was appointed as the head of the department of Historical Anthropology at the Natal Museum, Pietermaritzburg. His tasks included academic research and publication, display conceptualization, and curating the African ethnology collections of the Museum. He developed various displays at the Natal Museum on topics ranging from Zulu material culture, traditional healing, and indigenous

classificatory systems. During this period Frans also developed a close association with the Departments of Fine Art, Psychology, and Cultural and Media Studies at the then University of Natal. He assisted many post-graduate students with projects relating to the cultural heritage of South Africa. He also taught post-graduate courses on qualitative research methodology to honours students at the Psychology Department, University of Natal. During this period he served on the editorial boards of the *South African Journal of Field Archaeology* and *Natalia*.

Frans left the Natal Museum in 2001 when approached by a Swiss funding agency to assist an international NGO (Working Group for Indigenous Minorities) with the conceptualization of a San or Bushman museum near Cape Town. During this period he consulted extensively with various San groupings in South Africa, Namibia and Botswana. During this period he also made major research and conceptual contributions to the Kamberg and Didima Rock Art Centres in the Ukhahlamba Drakensberg World Heritage Site.

Between 2003 and 2007 Frans was employed as the Cultural Resource Specialist for the Maloti Drakensberg Transfrontier Project – a bilateral conservation project funded through the World Bank. This project involved the facilitation with various stakeholders in order to produce a cultural heritage conservation and development strategy for the adjacent parts of Lesotho and South Africa. Frans was the facilitator for numerous heritage surveys and assessments during this project. This vast area included more than 2000 heritage sites. Many of these sites had to be assessed and heritage management plans designed for them. He had a major input in the drafting of the new Cultural Resource Management Plan for the Ukhahlamba Drakensberg World Heritage site in 2007/2008. A highpoint of his career was the inclusion of Drakensberg San indigenous knowledge systems, with San collaboration, into the management plans of various rock art sites in this world heritage site. He also liaised with the tourism specialist with the drafting of a tourism business plan for the area.

During April 2008 Frans accepted employment at the environmental agency called Strategic Environmental Focus (SEF). His main task was to set-up and run the cultural heritage unit of this national company. During this period he also became an accredited heritage impact assessor and he is rated by both Amafa and the South African Heritage Resources Agency (SAHRA). He completed almost 50 heritage impact assessment reports nation-wide during an 18th month period.

Frans left SEF and started his own heritage consultancy called “Active Heritage cc” in July 2009. Although mostly active along the eastern seaboard his clients also include international companies such as Royal Dutch Shell through Golder Associates, and UNESCO. He has now completed almost 1000 heritage conservation and management reports for various clients since the inception of “Active Heritage cc”. Amongst these was a heritage study of the controversial fracking gas exploration of the Karoo Basin and various proposed mining developments in South Africa and proposed developments adjacent to various World Heritage sites. Apart from heritage impact assessments

(HIA's) Frans also assist the National Heritage Council (NHC) through Haley Sharpe Southern Africa', with heritage site data capturing and analysis for the proposed National Liberation Route World Heritage Site and the national intangible heritage audit. In addition, he is has done background research and conceptualization of the proposed Dinosaur Interpretative Centre at Golden Gate National Park and the proposed Khoi and San Interpretive Centre at Camdeboo, Eastern Cape Province. During 2009 he also produced the first draft dossier for the nomination of the Sehlabathebe National Park, Lesotho as a UNESCO inscribed World Heritage Site.

Frans was appointed as temporary lecturer in the department of Heritage and Tourism, UKZN in 2011. He is also a research affiliate at the School of Cultural and Media Studies in the same institution. Frans also assisted Boston Colledge with the preparation of online teaching modules for Anthropology 1 & 2 with the start of the Covid Pandemic in early 2020.

Frans's research interests include African Iron Age, paleoecology, rock art research, San ethnography, traditional healers in South Africa, and heritage conservation. Frans has produced more than forty publications on these topics in both popular and academic publications. He is frequently approached by local and international video and film productions in order to assist with research and conceptualization for programmes on African heritage and culture. He has also acted as presenter and specialist for local and international film productions on the rock art of southern Africa. Frans has a wide experience in the fields of museum and interpretive centre display and made a significant contribution to the conceptual planning of displays at the Natal Museum, Golden Horse Casino, Didima Rock Art Centre and !Khwa tu San Heritage Centre. Frans is also the co-founder and active member of "African Antiqua" a small tour company who conducts archaeological and cultural tours world-wide. He is a Thetha accredited cultural tour guide and he has conducted more than 50 tours to heritage sites since 1992.

Declaration of Consultants independence

Frans Prins is an independent consultant to Mondli Consulting Services and has no business, financial, personal or other interest in the activity, application or appeal in respect of which he was appointed other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances whatsoever that compromise the objectivity of this specialist performing such work.



Frans Prins

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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 1840 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 desktop heritage survey of the Proposed Cement Grinding Mill, on Remainder of Portion 2108 Of Umlazi Native Location No 4676, Umbogintwini, eThekweni Municipality eThekweni identified no archaeological features or sites on the footprint or within 500m from the proposed development plot. However, the remains of two Bunkers that dates back to the Second World War occurs in the far western section of the proposed development plot. These have previously been evaluated by a built heritage specialist and no reason given why these features should be retained as they are both in a sad state of preservation. In fact, it was recommended that demolition may be the best course of action in terms of mitigation. The consultant in this study concurs with this earlier evaluation. Amafa has issued a permit for their destruction in 2012. This permit, however, has expired and now has to be reviewed. The phase 1 desktop paleontological desktop study indicates that the project area falls within an area with a high paleontological sensitivity. The study area needs to be assessed by an Amafa accredited palaeontologist before destruction may proceed. We would like to draw attention to the South African National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), which requires that operations that expose archaeological, or historical remains as well as fossil remains should cease immediately, pending evaluation by the provincial heritage agency.

1 BACKGROUND INFORMATION ON THE PROJECT

Table 1. Background information

Consultant:	Frans Prins (Active Heritage cc) for Mondli Consulting Services
Type of development:	General Industry (Cement Grinding Plant)
Rezoning or subdivision:	Rezoning
Terms of reference	To carry out Desktop Heritage Impact Assessment including a Phase 1 Desktop Paleontological Impact Assessment. A heritage study was conducted in 2011. However, Amafa has triggered the need for a new heritage study
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 Amafa Research Institute and Heritage Act KwaZulu-Natal (Act No. 5 of 2018)

1.1. Details of the area surveyed:

The project site is located within Umbogintwini Industrial Complex at Umbogintwini on remainder of Portion 2108 at Umlazi native Location No 4670. The site is located at 1 Lodestar Avenue, surrounded by heavy industries (Figs 1 & 2). This is about 30km southeast of Durban Central Business District. The site is 28.69 hectares in extent, 8.14 hectares will be the cement grinding plant, 2.38 will be the private open space that is earmarked for possible future expansion for finished goods dispatch area, 8.85 hectares for the container storage, transport goods, manufacturing, and the warehousing for general items, 1.62 hectares D'MOSS and another 7/60 Ha as D'Moss.

The GPS coordinates for the centre of the footprint are as follows: 30° 1' 10.90" S and 30° 53' 41.32" E.

2 BACKGROUND TO ARCHAEOLOGICAL HISTORY OF AREA

2.1 Prehistory

The greater Durban area, including Umbogintwini, has been relatively well surveyed for archaeological heritage sites by the KwaZulu-Natal Museum and subsequently by private heritage consultants in the last few years. Prior to 1950, the archaeological site distribution of the area was poorly known.

The available evidence, as captured in the Amafa and KwaZulu-Natal Museum heritage site inventories, indicates that the area contains a wide spectrum of archaeological sites covering different time-periods and cultural traditions. These range from Early Stone Age, Middle Stone Age, and Later Stone Age to Early Iron Age, Middle Iron Age, and Later Iron Age sites. Two notable Middle Stone Age sites, i.e. Umlatuzana near Marianhill and Segubudu near Stanger have been excavated in the last two decades and yielded impressive archaeological stratigraphies relating to the period associated with the origins of anatomically modern people. The Umhlatuzana shelter is situated approximately 20 km to the north of the study area. Apart from an impressive stone tool assemblage covering both Later and Middle Stone Age periods it has also yielded faunal remains of large mammals that became extinct during the early Holocene such as the giant buffalo (*Pelarovis* sp). Also notable is the Shongweni Later Stone Age shelter which was excavated in the 1970's by Dr Oliver Davies. Shongweni is situated approximately 8 km to the north west of the project area. This shelter yielded some of the earliest remains of domesticated cereals in South Africa. The same site also yielded some of the only San rock art in the greater Durban area (Mazel 1989; Mitchell 2002). Four Middle Stone Age open air sites are situated to the immediate south of the project area. However, these sites were located in the 1970's and it is doubtful that they have survived the recent industrial development in the area.

Around 1 700 years ago an initial wave of Early Iron Age People settled along the inland foot of the sand dunes on sandy but humus rich soils which would have ensured good crops for the first year or two after they had been cleared. These early agro-pastoralists produced a characteristic pottery style known as Matola. The Matola people also exploited the wild plant and animal resources of the forest and adjacent sea-shore. The

communities seems to be small groups of perhaps a few dozen slash-and burn cultivators, moving into a landscape sparsely inhabited by Later Stone Age San hunter-gatherers.

By 1500 years ago another wave of Iron Age migrants entered the area. Their distinct ceramic pottery is classified to styles known as "Msuluzi" (AD 500-700), Ndongondwane (AD 700-800) and Ntshokane (AD 800-900). The majority of these sites occur inland along the major river valleys of KwaZulu-Natal below the 1000m contour (Maggs 1989:31; Huffman 2007:325-462). Various sites of this period have been recorded along the Umgeni River to the north of the study area, especially in the area close to Inanda Dam.

Some of the shell middens recorded along the coastline of KwaZulu-Natal belongs to the very first Nguni-speaking agropastoralists who settled in the province. These sites have been dated to approximately 1200 years ago. In addition, sites belonging to the immediate ancestors of the present Zulu-speaking communities in the area have been located in various locations in the greater Durban area. A small cluster of 4 sites occur to the immediate south of the project area (Fig). A large percentage of more recently recorded sites occur along the dune cordon and slightly inland in the form of shell middens which were mostly created by Iron Age shellfish gatherers although some of the stratigraphic layers may extend back to Later Stone Age periods (Anderson pers.com). Shell middens with both later Stone Age and Iron Age cultural material occur near the mouth of the Umlazi River.

2.2 Colonial Period

The Portuguese seafarer Vasco da Gama arrived at the bay of the Durban of today on Christmas Eve in the year 1497, and called it "Terra do Natal", Christmas Country. Because the Portuguese had already established a good port at Maputo, they were not interested in settling in a bay surrounded by mangrove swamps and dense coastal forests. Only sporadically some pirates and ivory or slave dealers laid anchor, and it was much later, in the year 1824, that a proper settlement started, initially named "Port Natal". It was founded by merchants from the Cape Colony under the leadership of Henry Francis Fynn, who had reached a contractual agreement with the mighty Zulu King Shaka authorising them to establish a trading station. In 1835 the town was named Durban after the Cape Governor of the time, Sir Benjamin D'Urban.

In the beginning the settlement developed very slowly. There was no support or protection by the British government. The life in the little harbour town was characterised by uncertainty. Time and again there were assaults and skirmishes by the Zulus, who - obviously - saw Natal as their territory and only tolerated the white settlers, because the town was of use to them as a trading station. In 1837 the Voortrekkers arrived in Natal. A delegation led by Piet Retief negotiated a contract with Zulu King Dingane granting them the land between Durban and the Tugela River to found a Boer Republic in Natal. Then, shortly afterwards, Dingane had the entire delegation killed. After several more bloody assaults and attacks, the Voortrekkers defeated the Zulus in the dramatic Battle at the Bloodriver. Subsequently the settlers founded their Republic "Natalia" and laid claim on Durban, which, however, met with strong resistance from the British. They sent troops to Durban, who were defeated in the Battle of Congella in 1842. Noteworthy, during this engagement was the epic ride of Dick King on horseback to Grahamstown in order to request British reinforcements. As a result the British managed to secure their dominance in Natal. The Voortrekkers resorted to trekking further north and found a new home in the Orange Free State and the Transvaal. In 1844, Natal - with Durban - was incorporated into the British Cape Colony. Durban was set to become one of the most important seaports of the British Empire. Particularly significant was the settling of Indian indent labourers in the area in the 1880's and the subsequent boom of the sugarcane industry in Natal towards the end of the 19th century. Durban's seaport became the largest sugar terminal in the world.

Various colonial era and historical period sites occur in the greater Durban area. These date from about 1840 and are usually associated with the European as well as Indian settlers in the area. These are older than 60 years and are therefore also protected by heritage legislation (Derwent 2006).

3 BACKGROUND INFORMATION OF THE DESKTOP SURVEY

3.1 Methodology

3.1.1 *Survey of the literature*

A survey of the relevant literature was conducted with the aim of reviewing the previous research done and determining the potential of the area. In this regard, archaeological

and historical sources were consulted. A large number of Cultural Resource Management Reports, as obtained from the SAHRIS website, deal with aspects of heritage in the greater Durban and eThekweni region. Some deals with heritage surveys in areas in the close environs of the project area (For instance see Prins 2012; Napier 2017). However, none of these studies covers the actual footprint.

3.1.2 Data bases

The *Heritage Atlas Database*, the *Environmental Potential Atlas*, the *Chief Surveyor General* and the *National Archives of South Africa* were consulted. We also looked at the *Provincial Archaeological Data Base of the KZN Museum*. Database surveys produced numerous heritage sites located in the greater eThekweni area but none within the near environs of the proposed development.

3.1.3 Other sources

Aerial photographs and topocadastral and other maps were also studied. Old aerial photographs of the project area did reveal man-made structures older than 60 years and potential heritage sites (see below). Information of a very general nature were obtained from these sources. Industrial buildings do occur on the proposed development plot but these are all younger than 60 years old and have no heritage value (Figs 6 & 7).

3.1.4 Assumptions and limitations

- The desktop study indicates that Stone Age Sites of all periods and traditions occur in the greater eThekweni Municipality area. Middle Stone Age sites occurred in the near environs to the project area and some may be located on the footprint as well.
- Early Iron Age sites do occur in the greater Durban area. However, none have been near the project area. However, it is possible that some may occur adjacent to the nearby Umlazi River.

- Later Iron Age sites, predating the 16th century, may occur in the project area. These sites were occupied by the ancestors of the first Nguni-speaking agriculturists, as well as their descendants who settled in these parts.
- Historical buildings, structures and farmsteads do occur scattered throughout the greater eThekweni area. Buildings associated with the early colonial history of Durban also occur to the immediate north of the study area. It can be expected that historical era buildings and structures could occur at or near the project area.
- 'Living heritage sites' usually occur close to African settlements and it can be expected that some may occur near the project area. The rural areas to the immediate west of the Umbogintwini Industrial Park may harbour living heritage values as relating to the "symbolic water complex" of southern Africa.
- The greater project area has been utilized for many decades and it is possible that built heritage sites may occur in the project area.

4 DESCRIPTION OF SITES AND MATERIAL OBSERVED

4.1 Locational data

Province: KwaZulu-Natal

Closest Towns: Durban

Suburb: Umbogintwini

Municipality: eThekweni Municipality

4.2 Heritage sites identified

The desktop survey did not locate any archaeological sites or features on the footprint. There are no known living heritage sites on the footprint. The area is also not part of any known Cultural Landscape (Table 3).

4.2.1 Built heritage

The Dick King's Grave is located approximately 4km to the north of the project area (Fig 3). However, this site is not threatened by the proposed development and there is no need for mitigation.

4.2.1.1 Two Bunkers

A previous CRM survey of the project area identified two Bunkers on the western side of the footprint (Whelan 2011) (Fig 4).. These Bunkers dates back to the Second World War period (1940's) and they are protected by provincial heritage legislation. Whelan (2011) provided an extensive discussion on the context and significance of the two bunkers. What follows is a summary of the main points in Whelan's (2011) report.

"The two bunkers under consideration are reinforced concrete structures. The bunker to the north is intact, though badly cracked, and the bunker to the south is roofless and has been for some time judging by the size of the fig trees that have made it their home. Both are sunk into the ground, providing a blast-wall. The one end is open and has a set of double steel doors. The convex concrete roof has extra support with a series of reinforced concrete brackets. The top of the roof is covered with a ribbed sheeting, most of which is obscured due to dense vegetation. The north bunker may have had a ventilation opening in the northern end, which has since been bricked in.

The concrete roof of the southern Bunker is long collapsed. It is located some 500m to the south of the north bunker, and is similarly mostly subterranean. Little remains of the structure except for the walls, and in their current state could be considered a safety hazard. The internal space is highly vegetated. Fig trees are growing out of the walls

Whilst clear direction as to the proper naming and purpose of these structures is still outstanding, it is necessary to recommend a course of action with regards to their future.

Statement: It is suspected that these structures were constructed by the Kynoch/ AE&CI factory as bomb shelters for their staff during the middle of the war. They do thus not form part of the suite of structures which were constructed by the RNAD during 1942-43.

From all enquiry these bunkers are unique in their context and construction.

- *They have not been positively identified by members of the armed forces or military enthusiasts as components of a well-known Durban Defence system.*
- *The reality and practicality of keeping coastal defenses such as this intact in an environment which is necessarily heavily policed due to its functioning as a chemical factory is problematic as far as public access is concerned.*
- *The southern bunker is virtually totally collapsed. The northern bunker has a recommendation for demolition due to its condition.*

Whilst recommending the retention of the northern bunker in the new development is an option, its fate would be worse than the current situation. It would be central to a new, denser factory development, and be devoid of any context whatsoever. In addition, lack of maintenance over the last few decades has meant that this is not likely to be perceived as being in a viable state for reuse as part of a new complex. In addition, its low levels of ventilation mean that it has limited prospects for reuse other than serving as a storeroom. Demolition, thus, appears as a single, practical option.” (Whelan 2011: 8 & 9).

Table 3 provides a description of these heritage sites.

Table 3. Heritage sites located during the ground survey.

	Heritage site category	Brief description	Significance (Table 3)	Mitigation	GPS Latitude and Longitude
1	Northern Bunker (Figs 8 & 9).	The bunker to the north is intact, though badly cracked. It is sunk into the ground, providing a blast-wall. The concrete roof of the Bunker is long collapsed. Little remains of the structure except for the walls, and in their current state could be considered a safety hazard. The northern bunker has a recommendation for demolition due to its condition.	The site is of medium to low significance (Table 3)	This bunker is a safety hazard. Demolition, appears as a single, practical option (Whelan 2011:9)	S 30° 1' 14.23" E 30° 53' 37.17"
2	Southern Bunker (Figs 10 & 11)	The bunker to the south is roofless and has been for some time judging by the size of the fig trees that have made it their home. It is sunk into the ground, providing a blast-wall. The southern bunker is virtually totally collapsed.	The site is of medium to low significance (Table 3)	This bunker is a safety hazard. Demolition, appears as a single, practical option (Whelan 2011:9)	S 30° 1' 17.13" E 30° 53' 37.16"

4.3 Rating

Both Bunkers has been rated as Generally Protected B (Table 4). The Bunkers needs to be recorded before destruction (Whelan 2011:9).

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

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 5. Evaluation and statement of significance.

Significance criteria in terms of Section 3(3) of the NHRA		
	Significance	Rating
1.	Historic and political significance - The importance of the cultural heritage in the community or pattern of South Africa's history.	Medium
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.	Low to medium
4.	Scientific significance – Importance in demonstrating the principal characteristics of a particular class of South Africa's cultural places/objects.	None
5.	Aesthetic significance – Importance in exhibiting particular aesthetic characteristics valued by a community or cultural group.	None
6.	Scientific significance – Importance in demonstrating a high degree of creative or technical achievement at a particular period.	None
7.	Social significance – Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.	None
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.	Medium to high
9.	The significance of the site relating to the history of slavery in South Africa.	None.

4.4 Phase 1 Paleontological Desktop Assessment

The SAHRIS fossil sensitivity map indicates that the project area has a high sensitivity in terms of potential paleontological finds (Fig 5). Following Amafa policy an accredited palaeontologist will need to conduct a desktop study of the project area before development may proceed.

5 CONCLUSION

The results of this desktop assessment suggests that no archaeological and living heritage sites occur on the footprint. The area is also not part of any know cultural landscape. There are no known living heritage sites associated with the footprint.

However, two Bunkers that dates back to the Second Word War are located in the western section of the footprint. In a detailed study conducted in 2011 Debra Wheelan, a built heritage expert, advised that both buildings are in a sad state of disrepair and that demolition may actually be the best way forward in terms of mitigation. At the time she received no letters of objection from other experts in the field. Amafa, the provincial heritage agency, subsequently issued a demolition permit. However, this permit expired in 2012 (Appendix 1). The present study concur with the conclusions reached by Whelan in 2011. It is thus recommended that a demolition permit be issued for the destruction of the two Bunkers on the site.

The Phase One Desktop Paleontological study noted that the site is situated in an area with a high fossil sensitivity.

We would like to draw attention to the South African National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), which requires that operations that expose archaeological, or historical remains as well as fossils should cease immediately, pending evaluation by the provincial heritage agency.

6 MAPS AND FIGURES

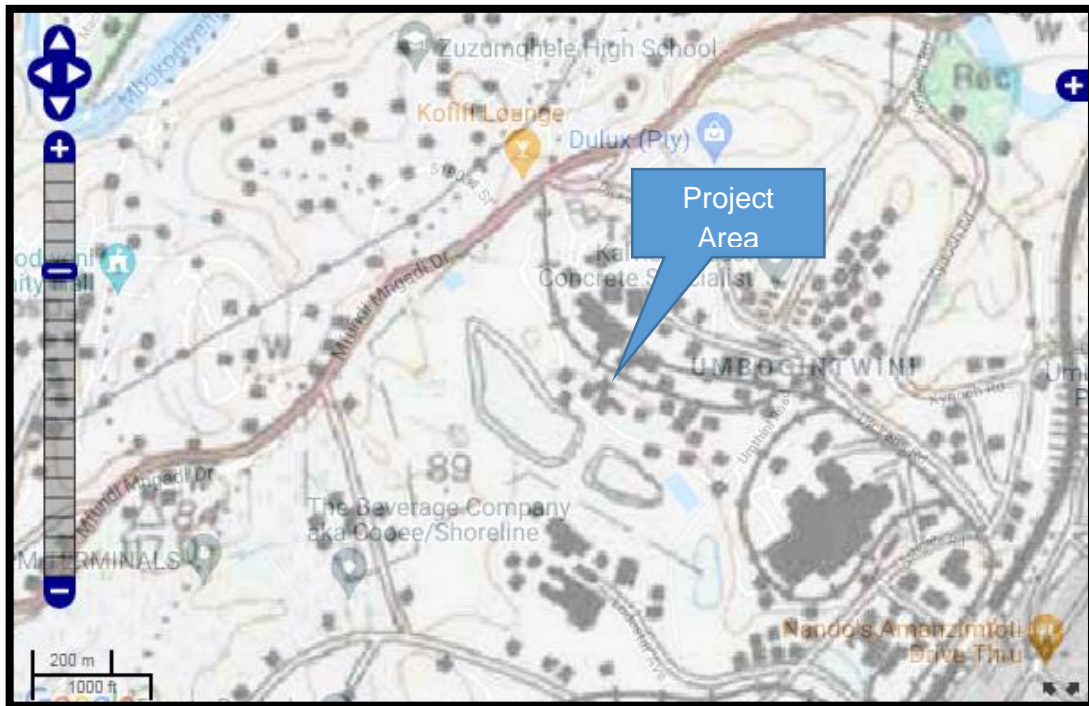


Figure 1. 1:50 000 Topographical Map showing the location of the project area at Umbogintwini.



Figure 2. Location and context of the project area at Umbogintwini.

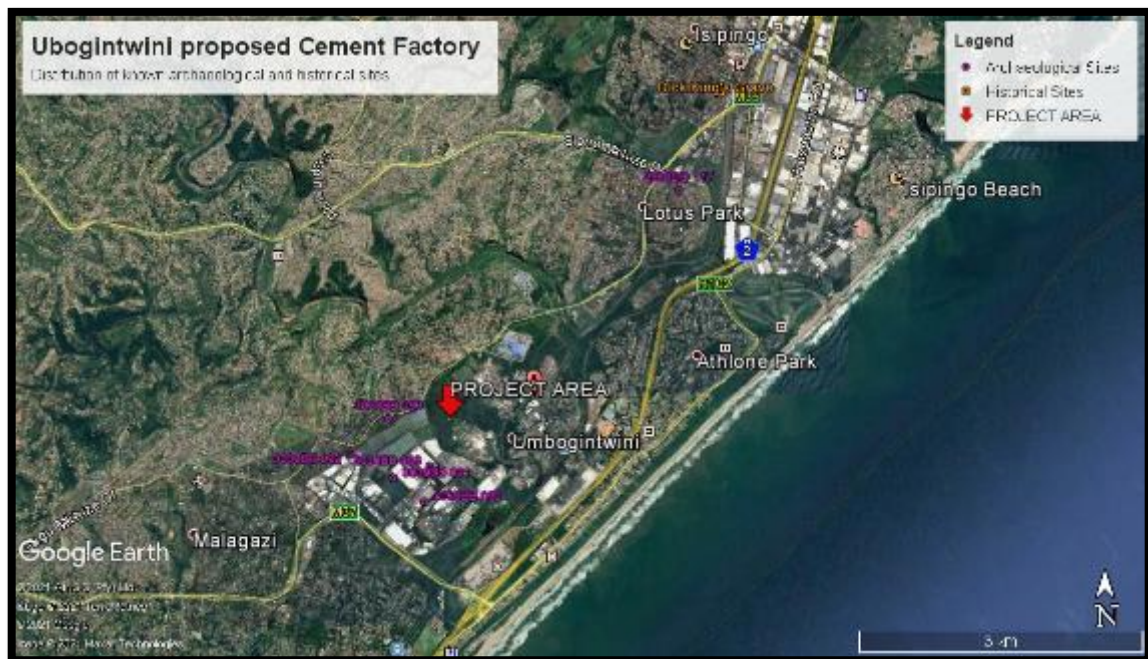
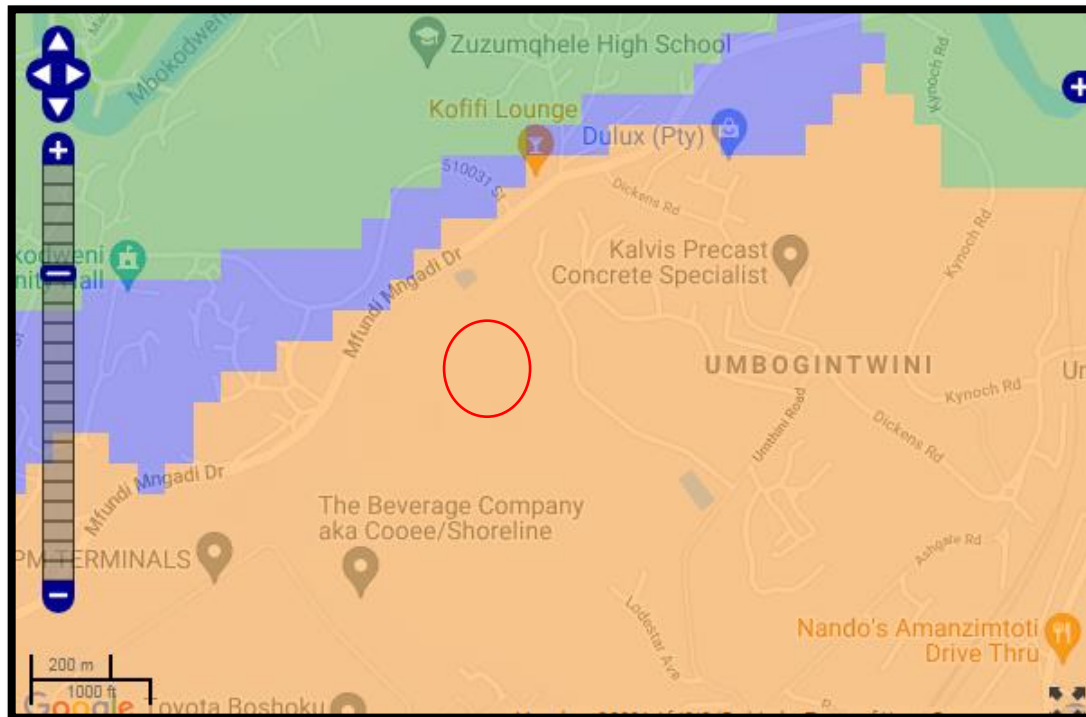


Figure 3. Google Earth Imagery showing the location of known archaeological sites (purple markers) and historical sites (yellow markers) in the greater Umbogintwini area.



Figure 4. Google Earth Imagery showing the location of the two Bunkers on the western end of the project area.



1 in 250 000 geological formation layers are courtesy of the Council for GeoScience
 For more information, go to [How to Use the Palaeontological \(fossil\) Sensitivity Map](#)

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.

Figure 5. Fossil sensitivity map of the study area (indicated by the red polygon). The yellow background indicates that the project area has a high fossil sensitivity (Source: SAHRIS)



Figure 6. Aerial view of the project area. The existing buildings/factories have no heritage value (Source: Mondli Consulting Services).



Figure 7. Existing factories in the central and eastern section of the project area have no heritage values (Source: Mondli Consulting Services).



Figure 8. Northern bunker southern aspect (Source: Whelan 2011).



Figure 9. Inside of the northern Bunker (Source: Whelan 2011).



Figure 10. Entrance to southern Bunker from the south (Source: Whelan 2011).



Figure 11. Southern Bunker from above (Source: Whelan 2011).

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APPENDIX 1

Amafa AkwaZulu-Natali
Heritage KwaZulu-Natal
Erfenis KwaZulu-Natal



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Pietermaritzburg 3200
Tel 033 394 6543
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PERMIT _____ Ref: 10/3Dbn/02 11/193
Issued under Section 33(1)(a) of the KwaZulu-Natal Heritage Act No. 4 of 2008

Approval is hereby given to MANFRED VICTOR MEYER Of PRIVATE BAG X 504, UMBONGINTWINI, 4120. In accordance with the application received on the 5 July 2011 and the no objection letter from Ken Gillings dated 18th August 2011, for the DEMOLITION of the bunkers
Situating at Sub L of 33 of Umlazi Natcol Location No. 4676, being **LODESTAR AVENUE, HEARTLAND COMPLEX, UMBONGINTWINI, DURBAN, ETHEKWINI**

Conditions: *This permit is issued subject to the following conditions:-*

- 1.1 That the alterations, additions, and/or demolition are carried out strictly in accordance with the application and report by arcaic consulting, received by Amafa on the 5 July 2011 and the no objection letter from Ken Gillings dated 18th August 2011;
- 1.2 That, in the event of any contemplated deviation from the (plans, drawings), including the transfer of work to the supervision of another architect/technologist, the prior written approval of Amafa AkwaZulu-Natali must be obtained;
- 1.3 In such event, a written motivation in support of such deviation must be submitted to AMAFA AKWAZULU-NATALI for consideration and;
- 1.4 No deviation from the (plans, drawings) will be undertaken without the prior written approval of Amafa AkwaZulu-Natali.
- 1.5 In the case of the demolition of a structure/s or part thereof, such demolition must take place not more than 30 days prior to the commencement of the alterations and or additions, unless otherwise agreed to, in writing, by Amafa AkwaZulu-Natali;
- 1.6 Amafa AkwaZulu-Natali shall have the right to inspect the site where the alteration, addition, demolition is to be undertaken prior to the commencement of the work, for the purpose of identifying salvageable elements which will not be required for re-use in the above project.
- 1.7 All salvageable elements identified must be delivered to the Amafa Conservation Materials Bank at the Applicant's cost.
- 1.8 **FAILURE TO COMPLY WITH THESE CONDITIONS WILL RENDER ANY DEVIATION FROM THE ORIGINAL (PLANS) UNLAWFUL, AND AMAFA-AKWAZULU NATALI RESERVES THE RIGHT TO INSTITUTE CRIMINAL AND/OR CIVIL ACTION AGAINST THE PERSON/S RESPONSIBLE.**
- 1.9 The issuing of this permit does not exempt the Applicant from obtaining the approval of the Local Authority or any other Authority, where required, for the proposed additions and or alterations.

Amafa AkwaZulu-Natali reserves the right to withdraw this permit if any of the above conditions are not complied with.

This permit is valid until 30 AUGUST 2012 AND IS NOT TRANSFERABLE.


For DIRECTOR

DATED AT PIETERMARITZBURG THIS 31 DAY OF AUGUST 2011



Permit Number 11-212d