

**A LETTER OF RECOMMENDATION FOR
EXEMPTION FOR MHLUNGWINI RURAL HOUSING
DEVELOPMENT, IMBABZANE LOCAL
MUNICIPALITY**

**FOR K2 ENVIRONMENTAL
DATE: 19 FEBRUARY 2017**

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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 applicant Imbabazane Local Municipality has identified the need to provide low cost rural subsidised housing throughout its area of jurisdiction. This process was initiated as a means to address the municipality's predominantly traditional/informal housing profile, and in doing so improve the living conditions and quality of life of its rural communities. The proposed Mhlungwini Rural Subsidised Housing Project is aimed at providing suitable housing to beneficiaries residing on a portion of Ward 3 of the Imbabazane Local Municipality.

The project area falls within a portion of Ward 3 of the Imbabazane Local Municipality. The total extent of the project area is approximately 1 316.35 Ha. The total population of the Imbabazane Local Municipality, as recorded in the Census 2011 is estimated at 113 046 persons while the overall population of the Mhlungwini Rural Housing project area is approximately 4 019 persons which resides in approximately 854 households within the project area.

The project area is situated in relatively mountainous areas, most of which still hold pristine natural character despite being inhabited by rural settlements. The current land use is predominantly rural with some subsistence crop production occurring within the homestead areas and on open spaces within the community. Surrounding land uses therefore include that of agriculture and low to medium density rural housing.

The proposed housing development will consist of the construction of approximately 1 000 new top structures within the project area, and will therefore service approximately 1 000 beneficiaries and their associated families.

This letter does not cover the bulk services.

Umlando was appointed by K2 Environmental to assess the need for an HIA for the proposed

Fig's 1 – 3 show the location of the proposed development.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA

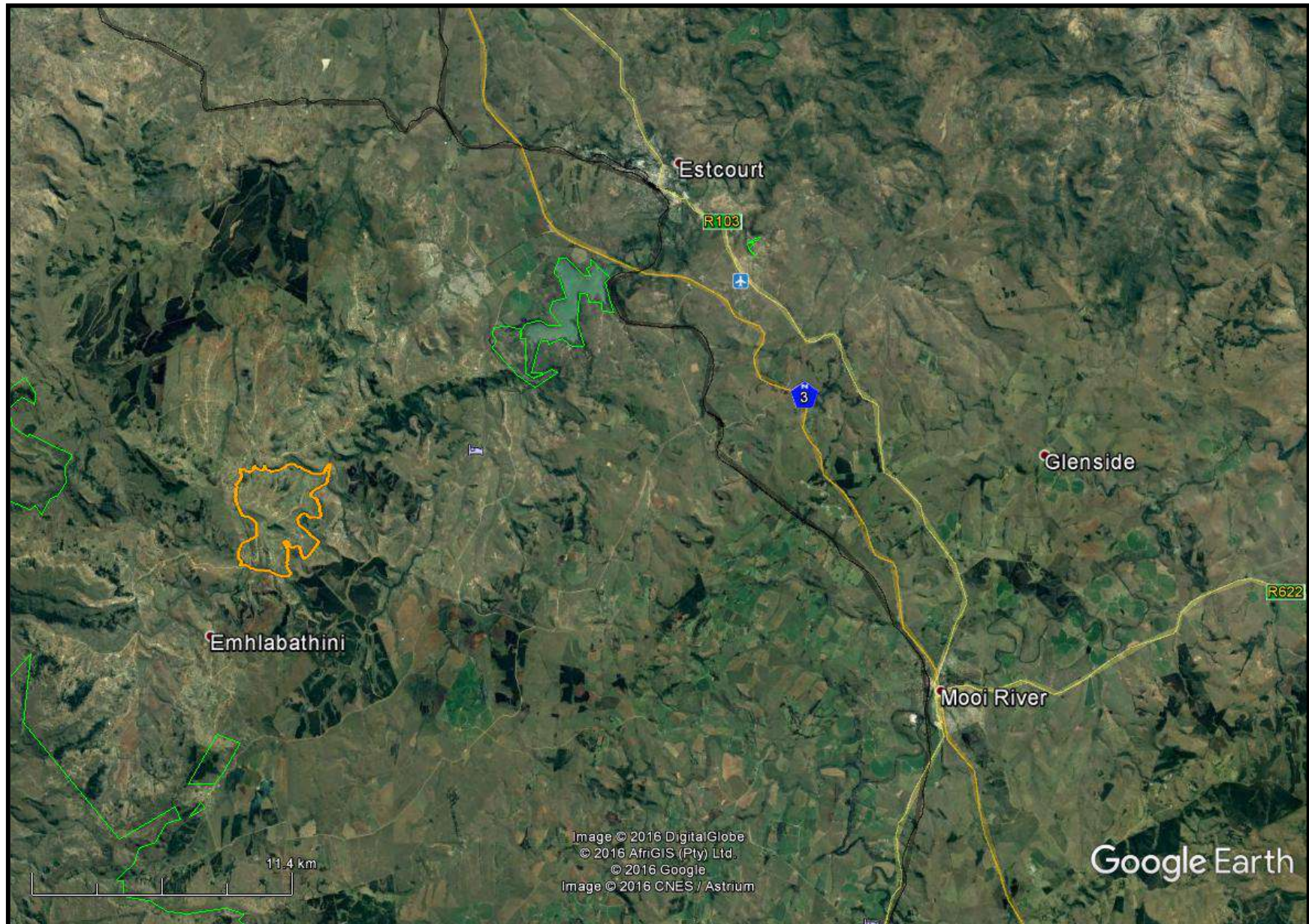


FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA

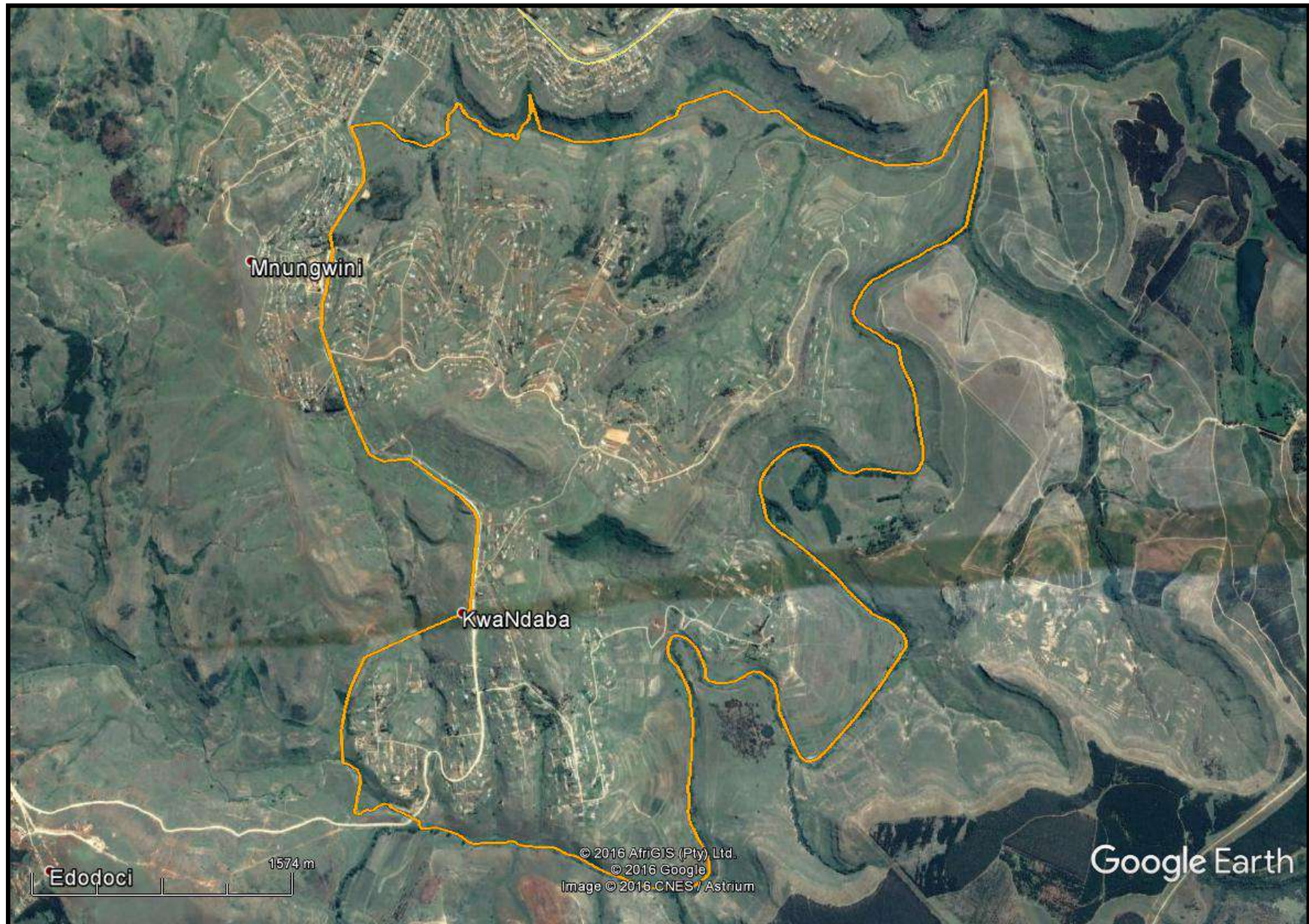


FIG. 3: TOPOGRAPHICAL OVERVIEW OF THE EASTERN STUDY AREA

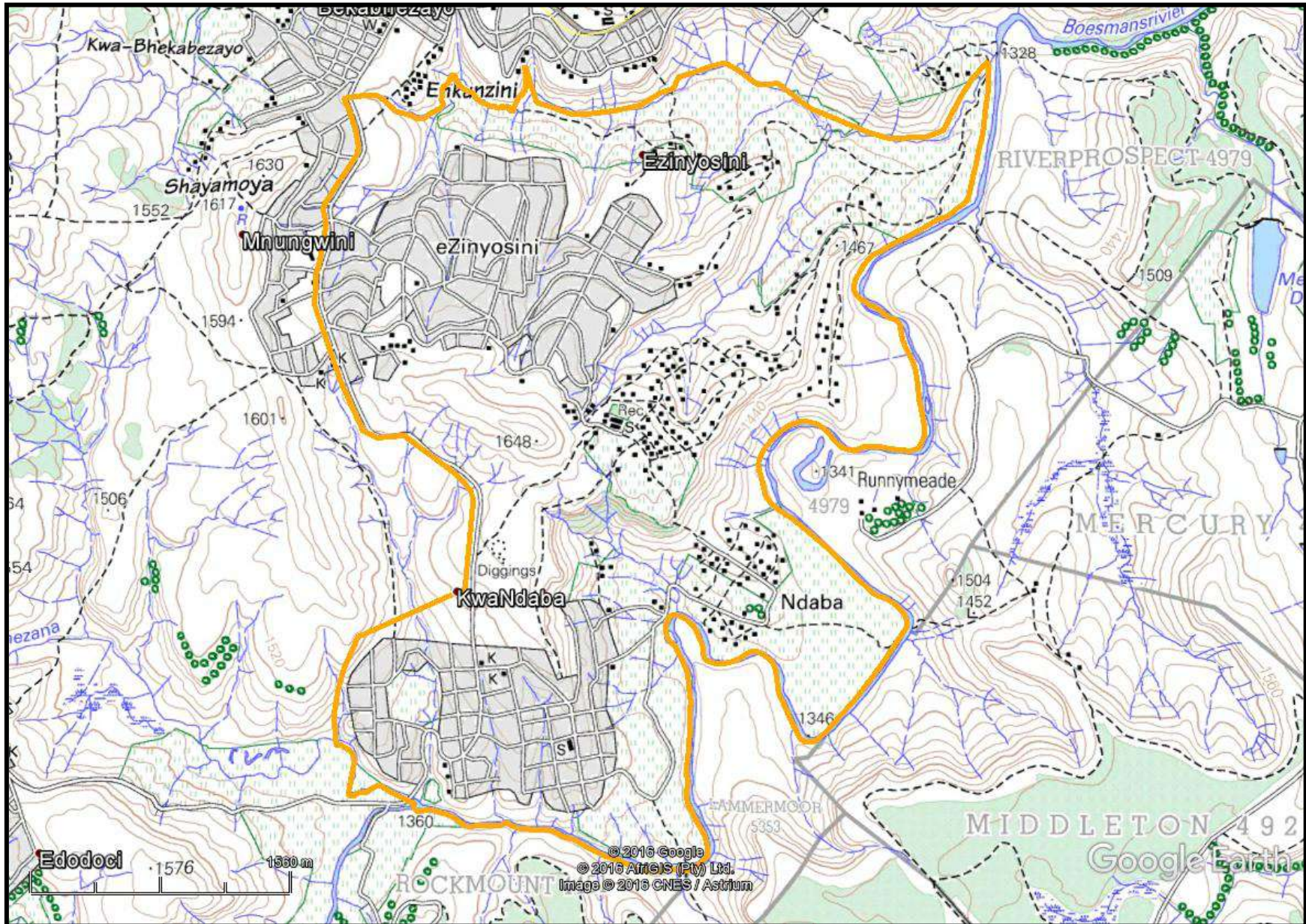


FIG. 4: SCENIC VIEWS OF THE STUDY AREA



DESKTOP STUDY

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. 4). These sites include all types of Stone Age and Iron Age sites. No sites occur in the study area. The location and houses are similar to a survey undertaken by Umlando at Empangweni and Bhekuzulu (Anderson 2016). No *in situ* artefacts were recorded during that survey.

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

The palaeontology for this area is red on the SAHRIS map, i.e. of very high sensitivity (fig. 6). The PIA report for the Bhekuzulu pipelines noted that the area has a mass extinction event (Anderson 2016). However, the housing development is unlikely to affect any sensitive layers. The housing will occur in already disturbed areas and trenching for houses should not be too deep to disturb *in situ* finds.

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

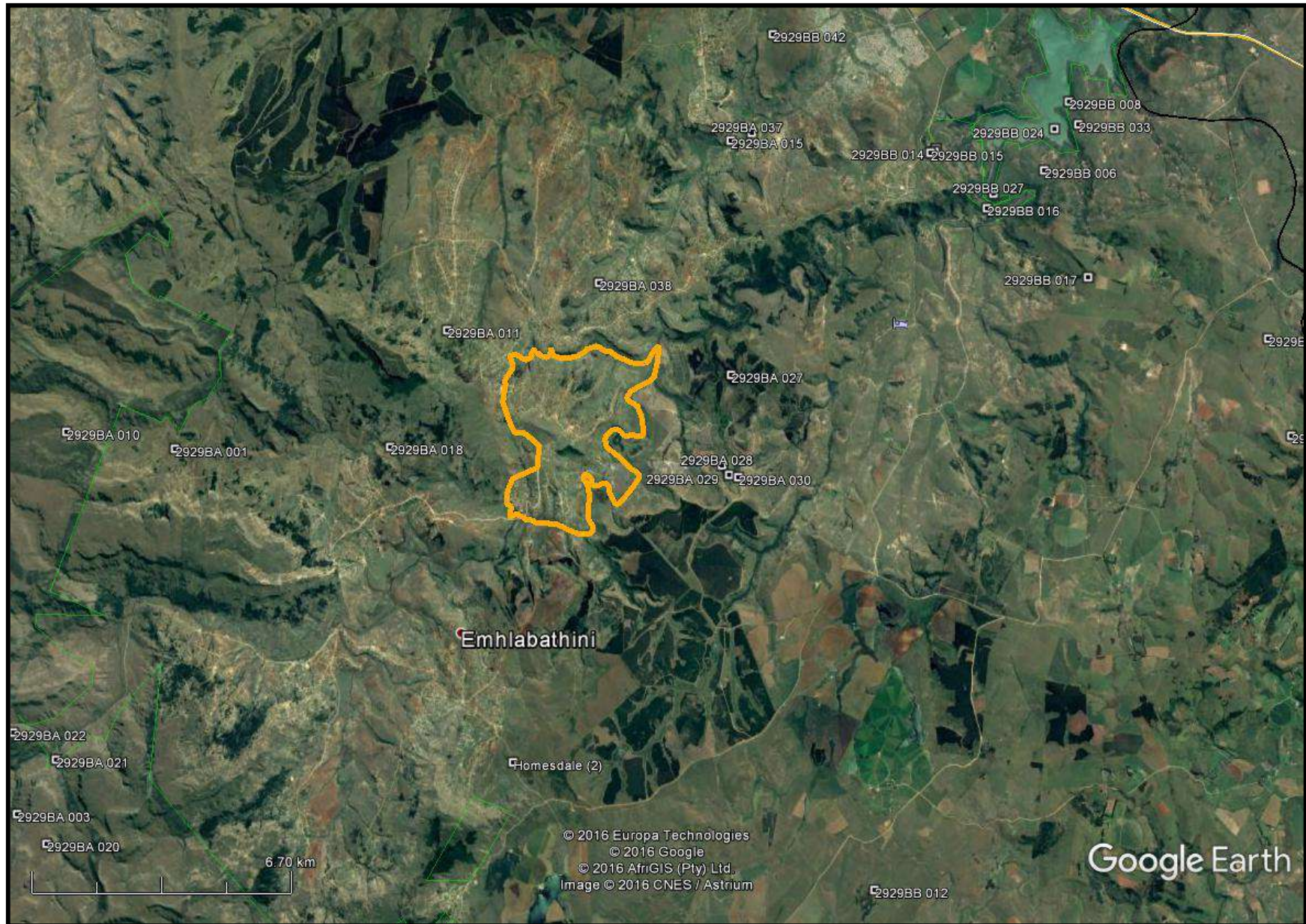
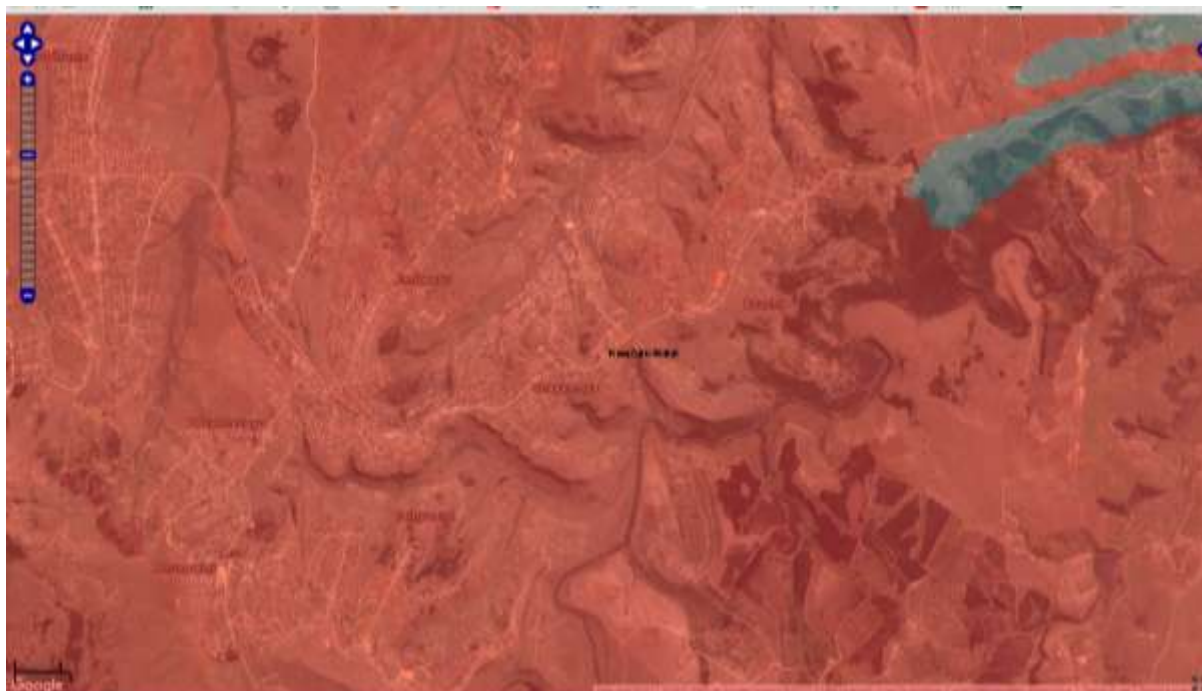


FIG. 6: PALAEOLOGICAL SENSITIVITY

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

A brief desktop heritage survey was undertaken for the proposed Emadungeni Rural Subsidised Housing Project. The proposed development will occur in existing housing footprints and thus the area to be disturbed has been disturbed already. Any graves that exist in the individual households will be managed by the family.

I recommend that the housing project be exempt from further HIA mitigation.

This exemption is only for the building of existing houses and their footprints, and not other infrastructures such as pipelines and roads.

REFERENCES

2929BA NTABAMHLOPE 2000

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 'G Anderson', with a horizontal line underneath.

Gavin Anderson
Archaeologist/Heritage Impact Assessor

