

**A LETTER OF EXEMPTION FOR MAMFEMTHENI  
RURAL SUBSIDISED HOUSING PROJECT,  
OKUHLAMBA LOCAL MUNICIPALITY, KZN**

**FOR K2M ENVIRONMENTAL**

**DATE: 22 NOVEMBER 2020**

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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 Okhahlamba 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 Mamfemtheni Rural Subsidised Housing Project is aimed at providing suitable housing to beneficiaries residing on a portion of Ward 2 of the Okhahlamba Local Municipality.

The proposed housing development will consist of the construction of approximately 1 500 new top structures within the project area, and will therefore benefit approximately 1 500 beneficiaries and their associated families

Umlando was requested to assist in the HIA and suggested that it be exempt from further HIA. Figures 1 – 4 show the location of the site. This letter of exemption is for the housing project only, and not related infrastructures.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA

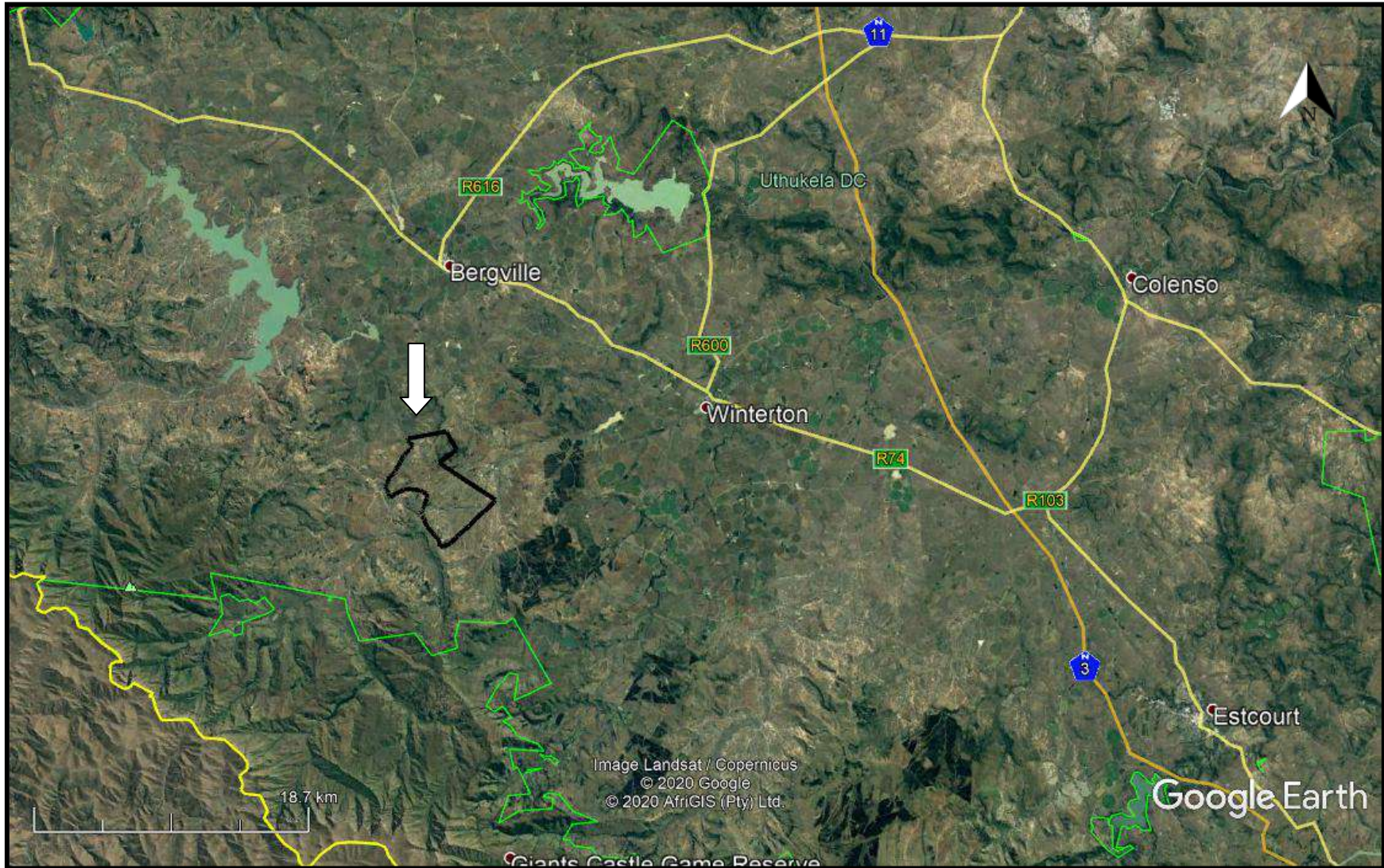


FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA



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

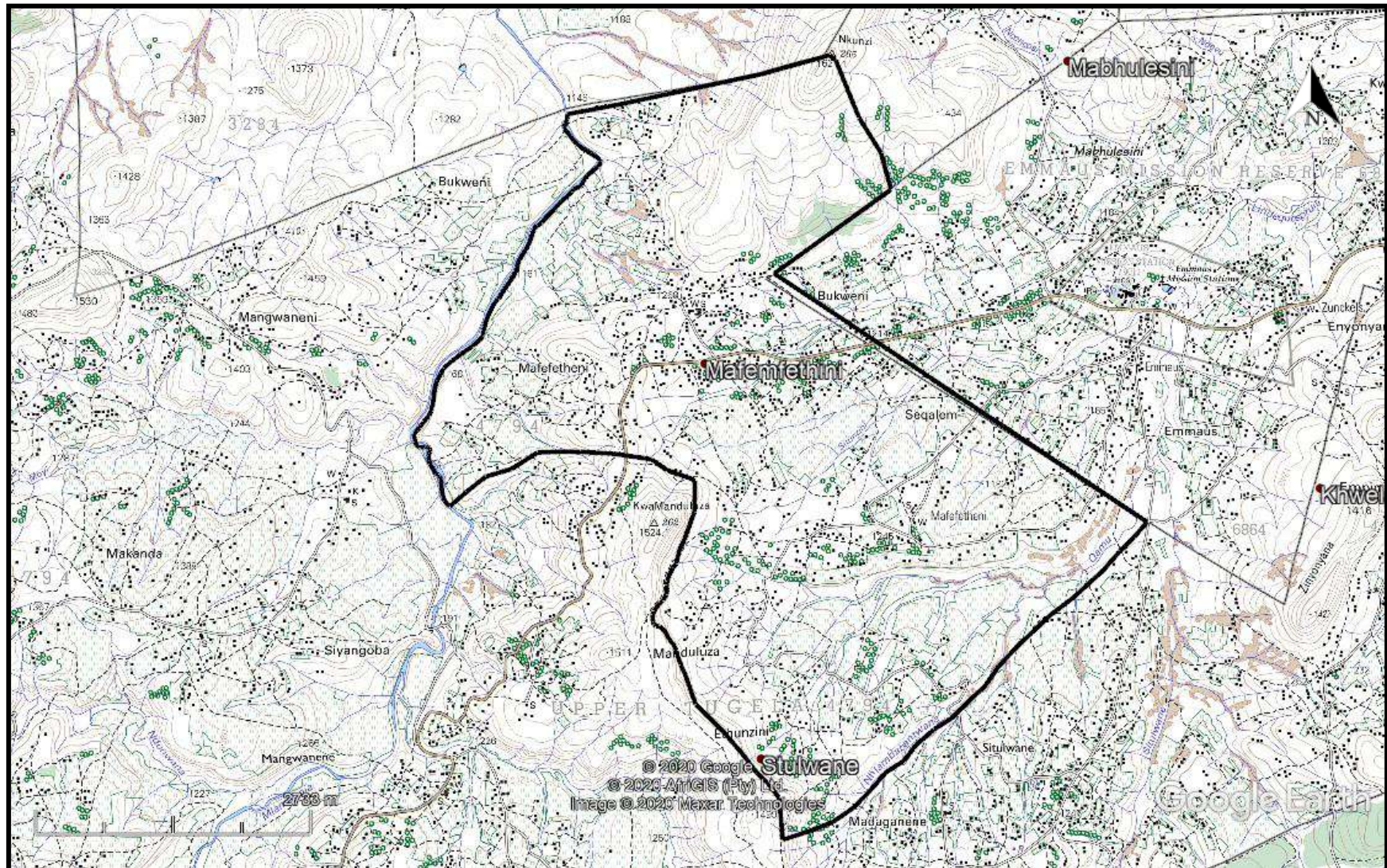


FIG. 4; SCENIC VIEWS OF THE SITE



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 high density of occupation in the area has resulted in any potential archaeological sites being destroyed.

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

The 1969 topographical map (fig. 6) maps indicate that the area was substantially occupied.

The study area is of very high palaeontological sensitivity. However, it is an *in situ* development and will not be extended into unweathered deposits. Any other development, such as pipelines etc. will require a PIA assessment.

No further HIA mitigation should be required for the housing development. This does not extend to infrastructures related housing developments.



FIG. 4: LOCATION OF KNOWN HERITAGE SITES NEAR THE STUDY AREA

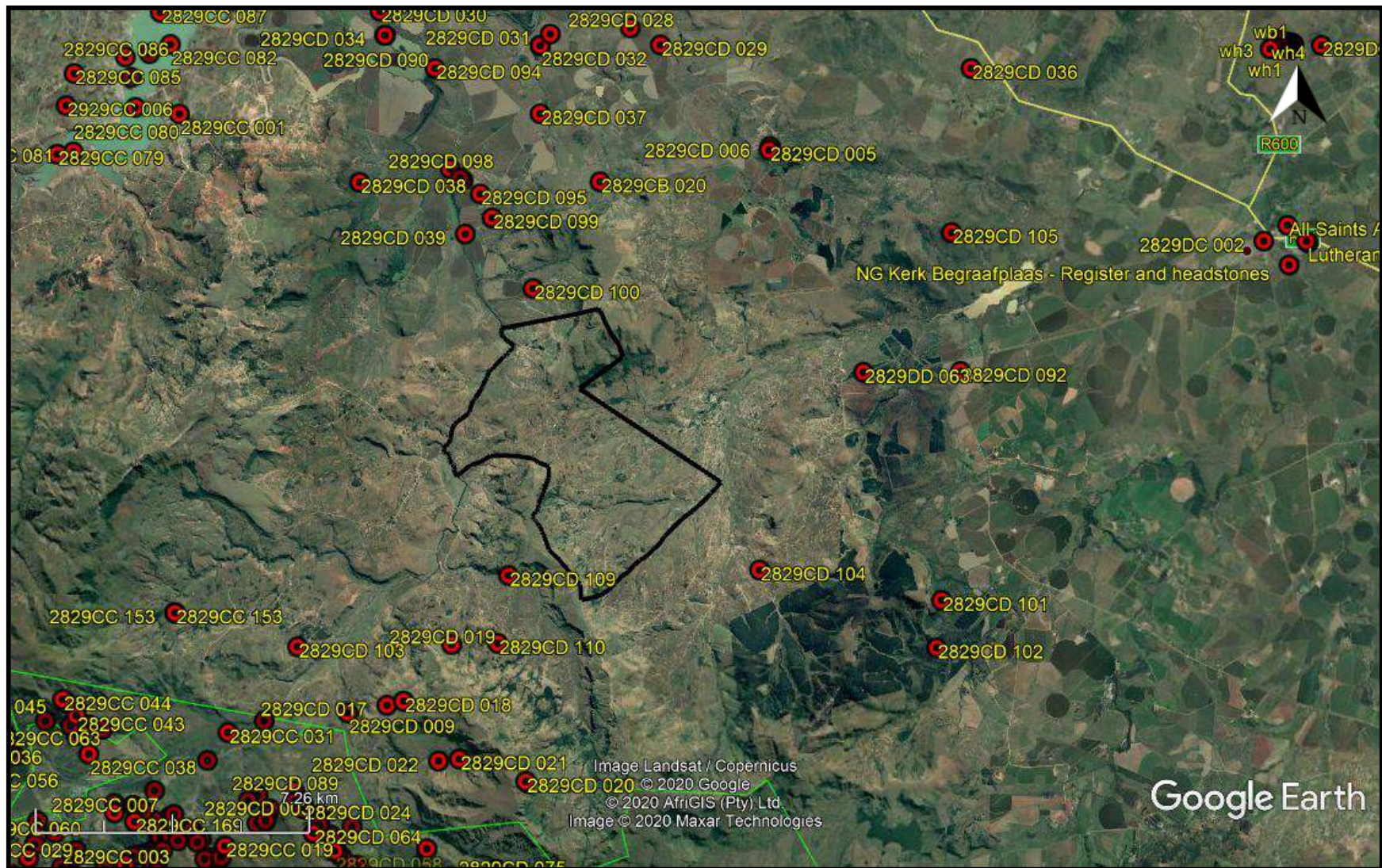


FIG. 5: STUDY AREA IN 1969

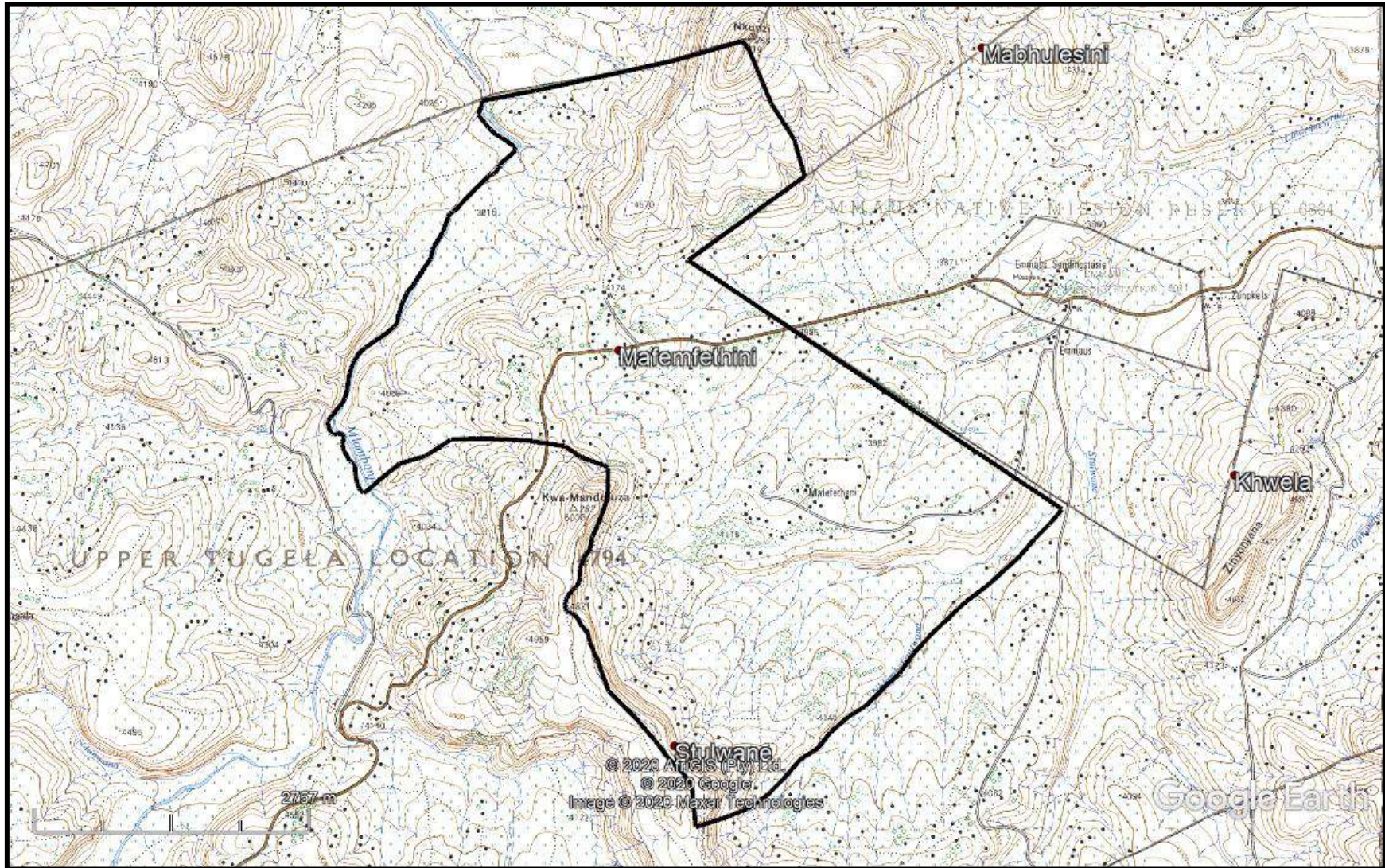


FIG. 6: PALAEOLOGICAL SENSITIVITY MAP



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.

### **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.



Gavin Anderson  
Archaeologist/Heritage Impact Assessor

