



**ETHEMBENI  
CULTURAL  
HERITAGE**

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15 May 2014

**Attention      Bernadet Pawandiwa**

Dear Ms Pawandiwa

**Application for Exemption from a Phase 1 Heritage Impact Assessment of the proposed Mfulomubi Rural Housing Project at Jolivet, Ukuthula Traditional Council, Ubuhlebezwe Municipality, KwaZulu-Natal**

**Project description<sup>1</sup>**

The proposed Mfulomubi Rural Housing Project is a rural *in situ* upgrade intending to serve 1500 *imizi* beneficiaries living in impoverished conditions in the Ukuthula Traditional Council area under the leadership of Nkosi Elloit.Z.Mkhize. The project area falls under jurisdiction of the Ingonyama Trust Board.

The project was initiated by the Ubuhlebezwe Municipality to provide housing for the beneficiary community and was approved by the MEC for Human Settlements in August 2012.

The majority of the community are settled along or just off the ridges mainly next to a relatively well established road network. Due to the majority of the beneficiary sites being along the ridges and gentle slopes, the provision of servicing is generally made easier.

The project area is generally well serviced with Provincial, District Roads and local access roads. Local roads within the proposed development area vary from gravel to rudimentary dirt roads and informal tracks and foot paths. No additional roads will be constructed within this project. Electricity has been provided to most of the community by Eskom in the form of pre-paid meters.

The project will not cause expansion into "greenfield" areas as the new residential structures will be built within existing *imizi* (homesteads). The only people to possibly be relocated are those within servitudes, flood lines or environmentally sensitive areas.

**Site assessment<sup>2</sup>**

The proposed development area is located along moderate to well elevated hills and slopes with well defined, deeply incised stream valleys and associated smaller tributaries, draining in a northerly direction

<sup>1</sup> Information obtained from client's Explanatory Memorandum (see SAHRIS Case ID: 3371).

<sup>2</sup> Preliminary Environmental Evaluation Report compiled by Sivist; Geotechnical Report compiled by Drennan Maude & Partners.

to the Umzinto River. The grasslands, valley thicket and valley bushveld on site all fall within the Ngongoni Veld vegetation unit as defined by Mucina and Rutherford (2006)<sup>3</sup>.

The southern half of the site has been substantially more settled than the northern half because of the more favourable topography for human settlement and agriculture. As a result, the majority of the grassland along the ridges, hilltops and gentle valley slopes has been transformed by the establishment of homesteads, schools, shops, roads, woodlots, farming and field-terracing, overgrazing and indiscriminate burning.

The major land use in the northern half of the site is given over to subsistence agriculture and communal grazing. This is jealously guarded.

## Recommendations

The Mzinto-Ixopo corridor is well known to the author as eThembeni has undertaken two power line surveys through the area. The study area has, also, been perused with Google Earth.

Given the extent of residential and ancillary buildings' expansion, the provision of water reticulation and the extant human activity in the study area, it is unlikely that any primary context archaeological deposits would be found. Further, sporadic archaeological surveys that have been conducted in the southern KwaZulu-Natal have revealed a very ephemeral archaeological footprint on the hills and slopes of the region. Most *in situ* deposits have occurred along the lower slopes and valley bottoms in the landscape or have been confined to shelters and overhangs.

As all housing construction is to take place within individual *imizi* precincts with the respective families in attendance, and all material delivery is to be transported along existing roads and tracks, the potential for disturbance of ancestral graves is low. Families owning graves will be present to caution activities in the vicinity of graves.

As such no heritage resources of any significance are expected to be impacted upon. We recommend, therefore, that no further heritage resource management interventions are required and that the project be exempt from the requirements of an Heritage Impact Assessment report.

Please could you convey Amafa's decision on this matter to the Project Manager, Mr Jaco Kellerman, of **Projecon cc.**

[jaco@projecon.co.za](mailto:jaco@projecon.co.za)

Yours sincerely



Len van Schalkwyk and Elizabeth Wahl

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<sup>3</sup> Mucina, L., Rutherford, M.C., 2006. The Vegetation of South Africa, Lesotho and Swaziland. Strelitzia, Cape Town.



**Fig 1. Mfulomubi Housing Project Study Area**