

**A LETTER OF EXEMPTION FOR THE EXISTING  
KNOWESLEY MINE, NEWCASTLE, KZN**

**FOR GEOFF SILK CIVIL & MINING CONSULTANT  
CC**

**DATE: 13 FEBRUARY 2020**

**By Gavin Anderson**

**Umlando: Archaeological Surveys and Heritage  
Management**

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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

Ekuseni Rehab (Pty.) Ltd. Is undertaking a prospecting right application for an old coal mine residue site in the Newcastle District of NKZN. The client intends to re-work, beneficiate and rehabilitate existing coal mine residue site. There will be no excavations into new areas. The mine is known as the Knowlesley Mine.

Umlando was requested to make a comment regarding the development. I suggested a Letter of Exemption since this area was already mined

Fig. 1 – 7 shows the location of the study area over different times. No known heritage sites occurred in the study area.

While the area is of high to very high palaeontological sensitivity, the study area consists of already mined material.

The project should be exempt from further HIA studies.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA

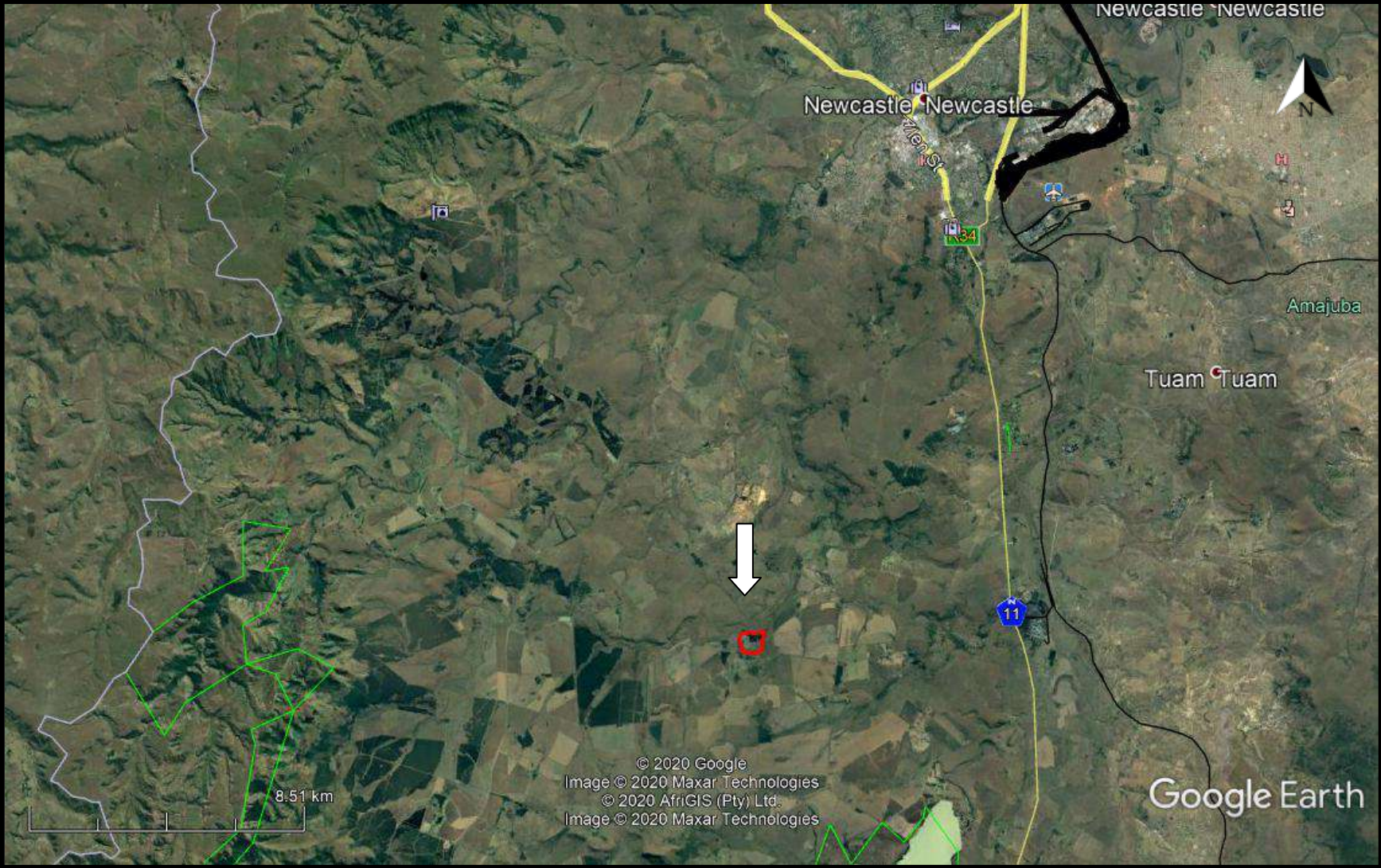


FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA



FIG. 3: TOPOGRAPHICAL OVERVIEW OF THE EASTERN STUDY AREA

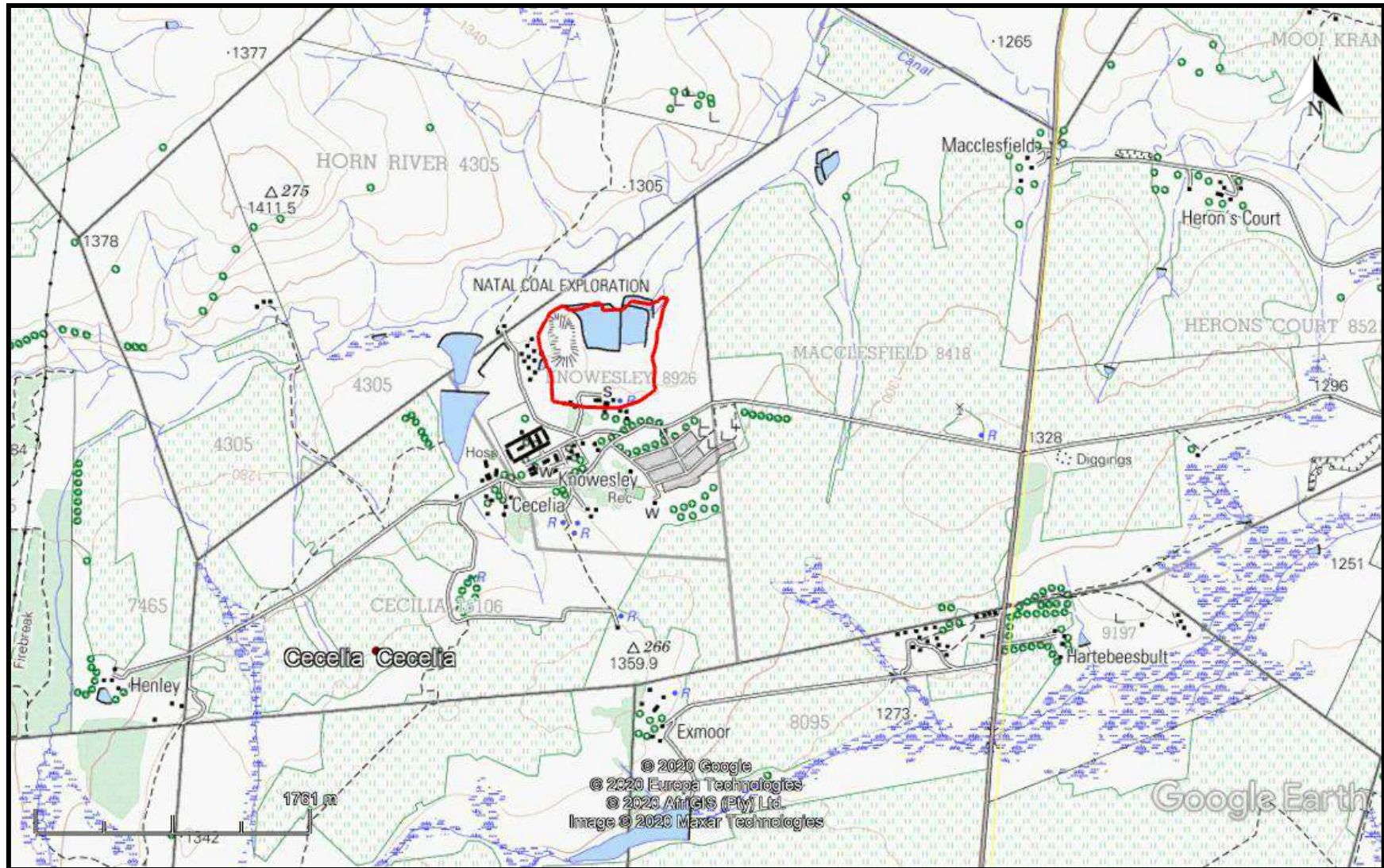


FIG. 5: LOCATION OF KNOWN HERITAGE SITES NEAR THE STUDY AREA

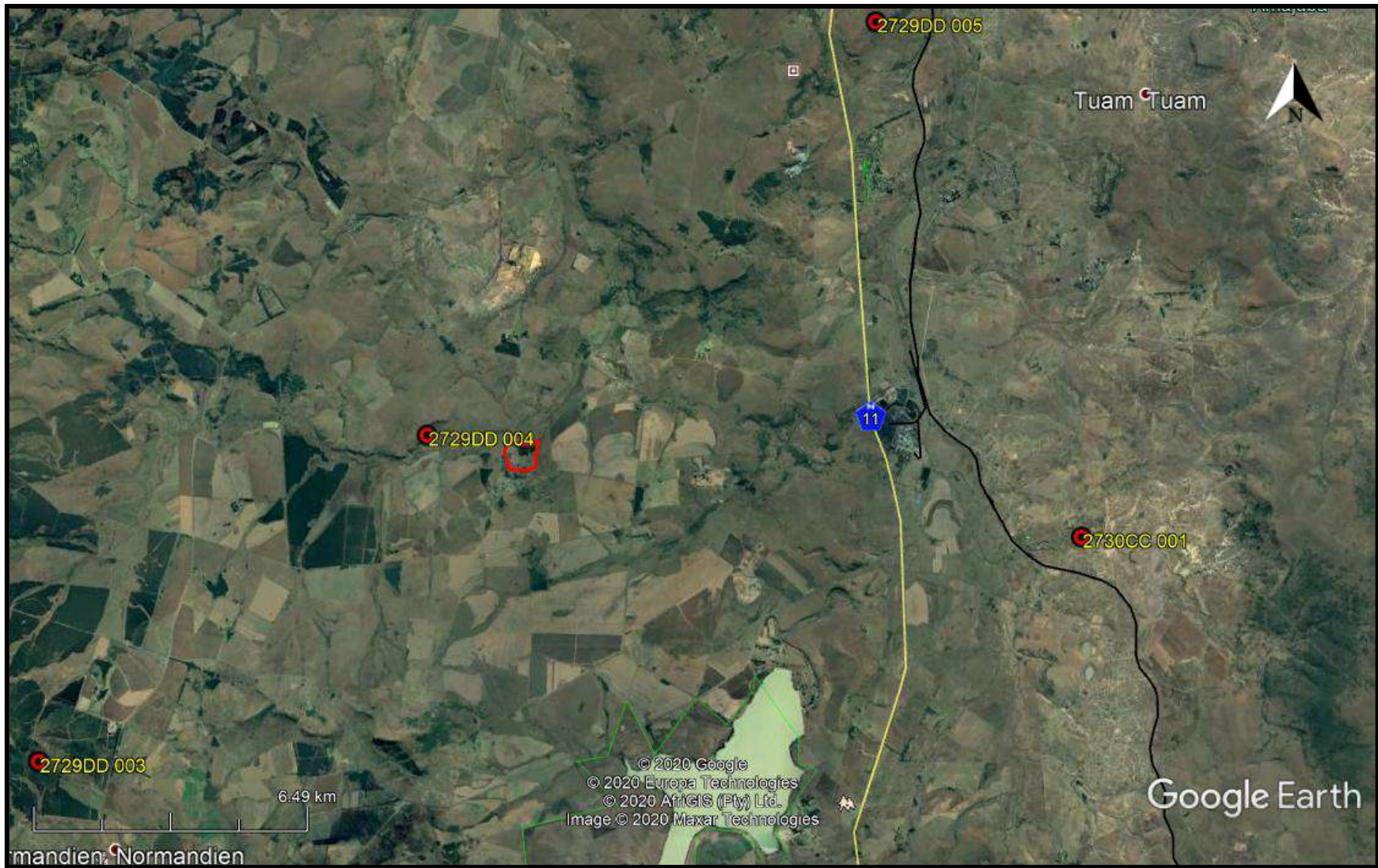


FIG. 7: STUDY AREA IN 1968

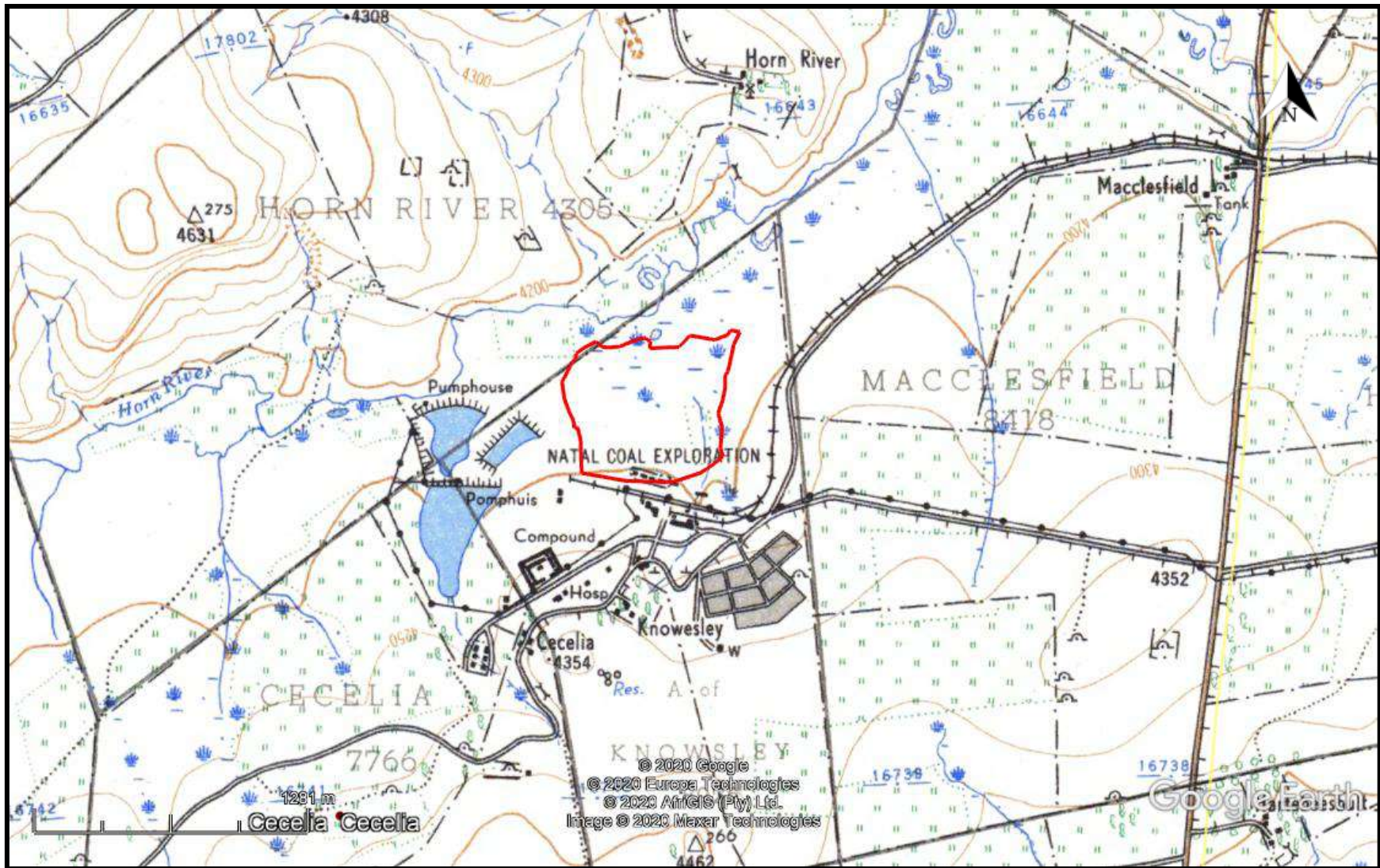




FIG. 8: PALAEOLOGICAL SENSITIVITY MAP



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 has 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