

**LETTER OF EXEMPTION FOR THE PROPOSED EXTENSION OF
THE SIDEWALK ALONG P237 ROAD IN ST. LUCIA, MTUBATUBA
LOCAL MUNICIPALITY**

FOR HANSLAB ENVIRONMENTAL CONSULTANTS (PTY) LTD

DATE: 21 SEPTEMBER 2021

By Gavin Anderson

**Umlando: Archaeological Surveys and Heritage
Management**

PO Box 10153, Meerensee, 3901

Phone: 035-7531785 Cell: 0836585362

umlando@gmail.com



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 client proposes to extend the footprint of an existing sidewalk by 3km in length, the width will be 3m. It is noted that P237 Road is the local road that serves as an access for the community of Dukuduku to St. Lucia... No new roads will be constructed, the proposed project scope only includes the extension of the sidewalk. The proposed development consists of constructing a concrete slab sidewalk and associated stormwater infrastructure along the P237 road with a linear footprint of 0.9ha.

The P237 Sidewalk will serve as daily access for the community of Dukuduku and St. Lucia to access the beach and places of work. The sidewalk extension will reduce risks to local people travelling on foot as the area gets high traffic during the holiday season” (Hanslab BID, 2021: 1-2)

Umlando was requested to assess the development in terms of its need for an HIA. Umlando suggested that it be exempt from further HIA as the area has already been disturbed by road works and existing infrastructure. Figures 1 – 4 show the location of the site.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA

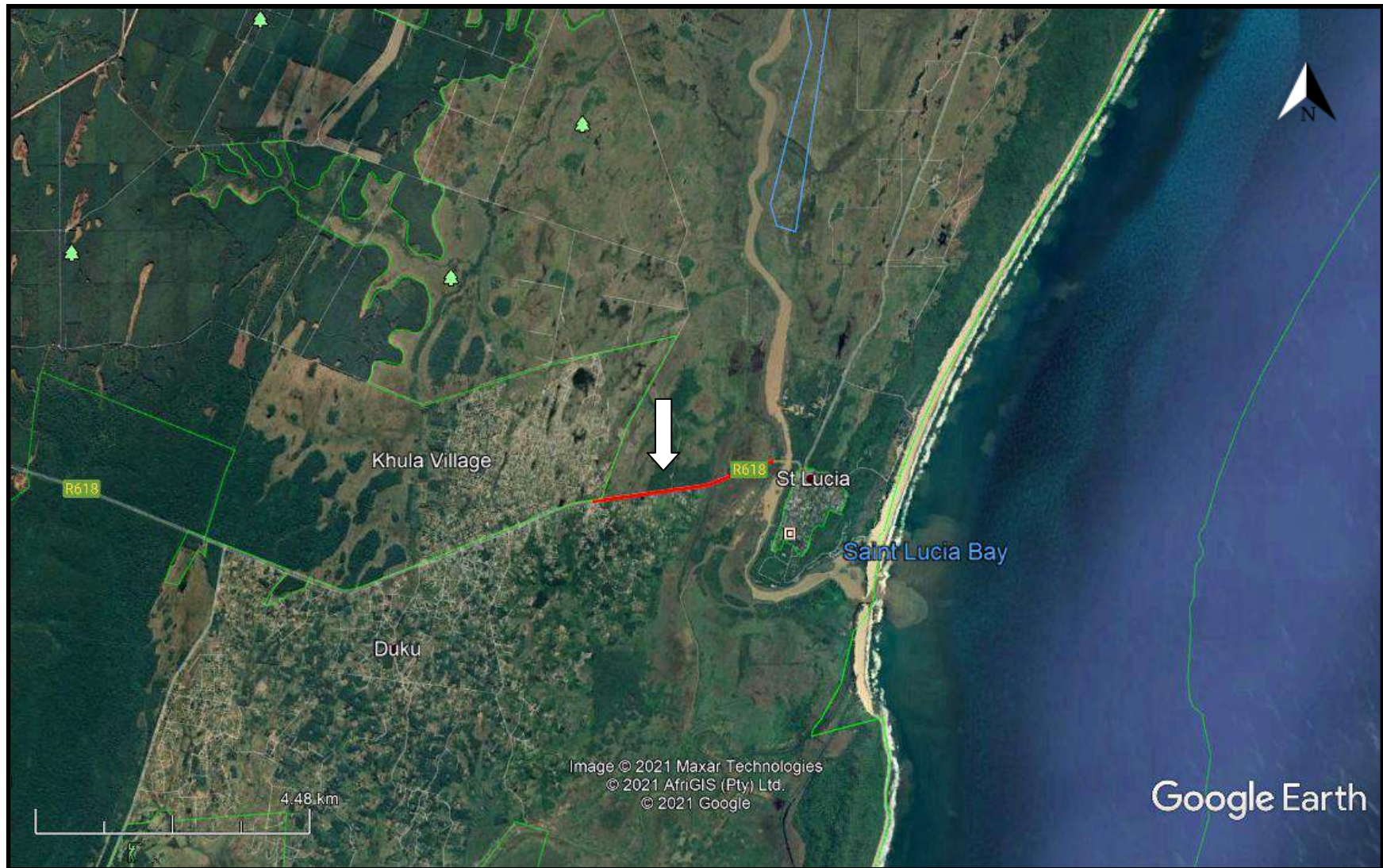


FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA

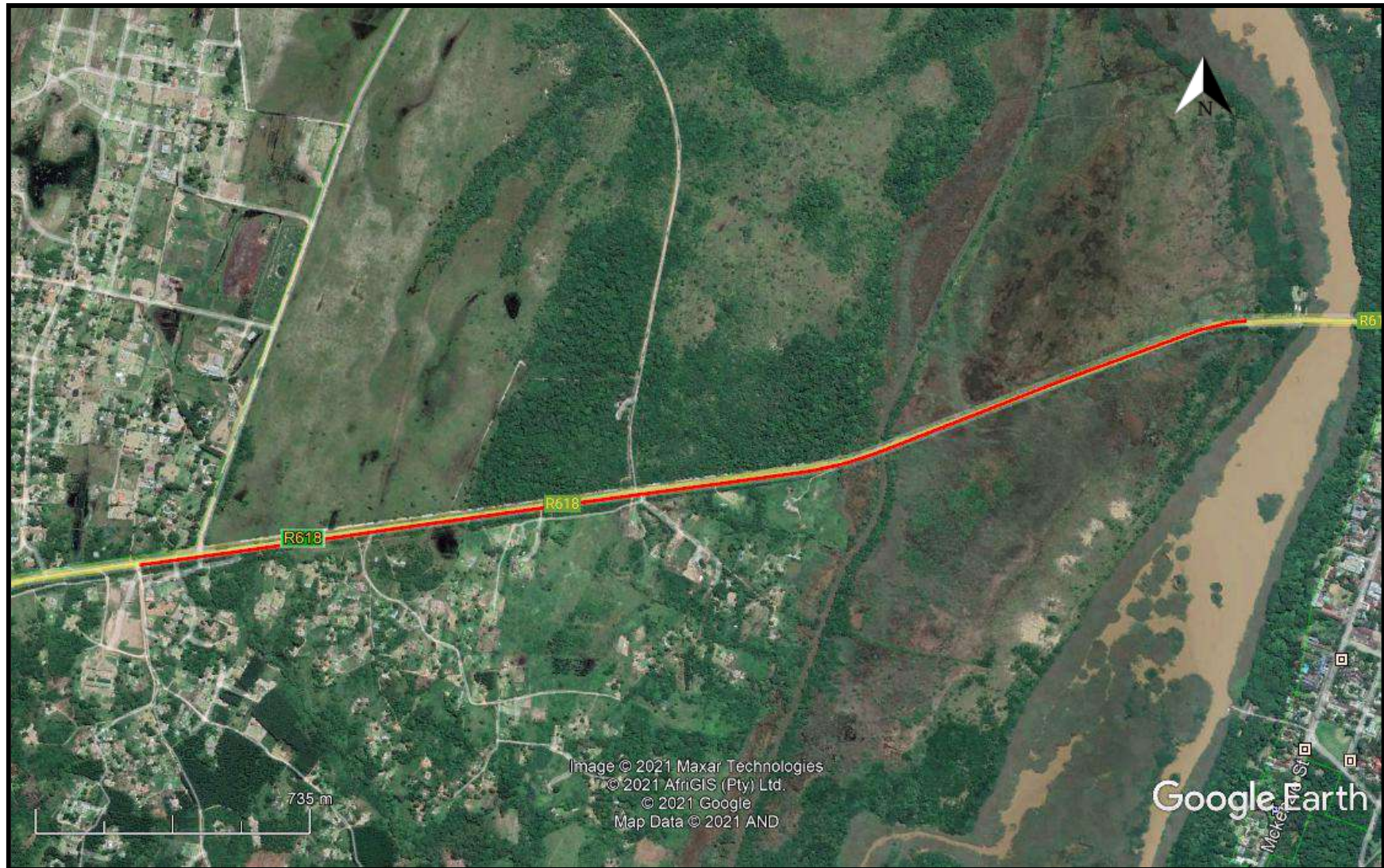
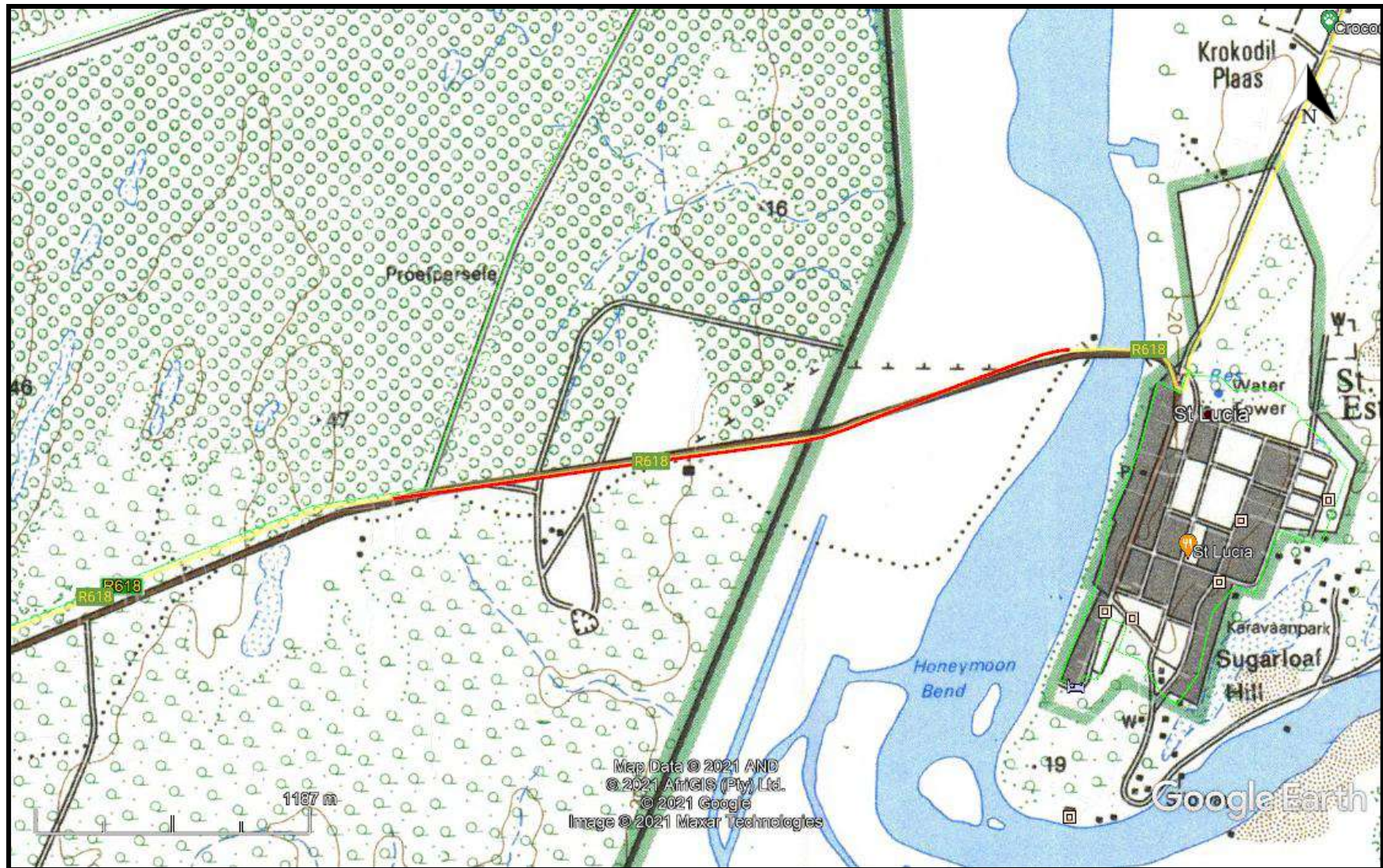


FIG. 3: TOPOGRAPHICAL OVERVIEW OF THE EASTERN STUDY AREA (1996)





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. 5). All of the heritage sites within the general study area are mostly Early and Late Iron Age sites, as well as Historical period settlements. A few Stone Age sites occur. The nearest heritage site occurs approx. 50m south of the road.

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

The 1937 (fig. 6) topographical map indicates that there are settlements in the general area but none occurs within 50m of the existing road. The original road was partly on the existing road.

The 1942 topographical shows that there are no settlements in the general area, and specifically the sidewalk area (fig. 7).

The study area is mostly of medium palaeontological sensitivity (fig. 7). The sidewalk upgrade will affect fossil bearing layers and thus no PIA is required.

The heritage desktop study suggests that the proposed sidewalk upgrade will have no effect on any heritage resources. No further heritage mitigation should be required for this development.

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

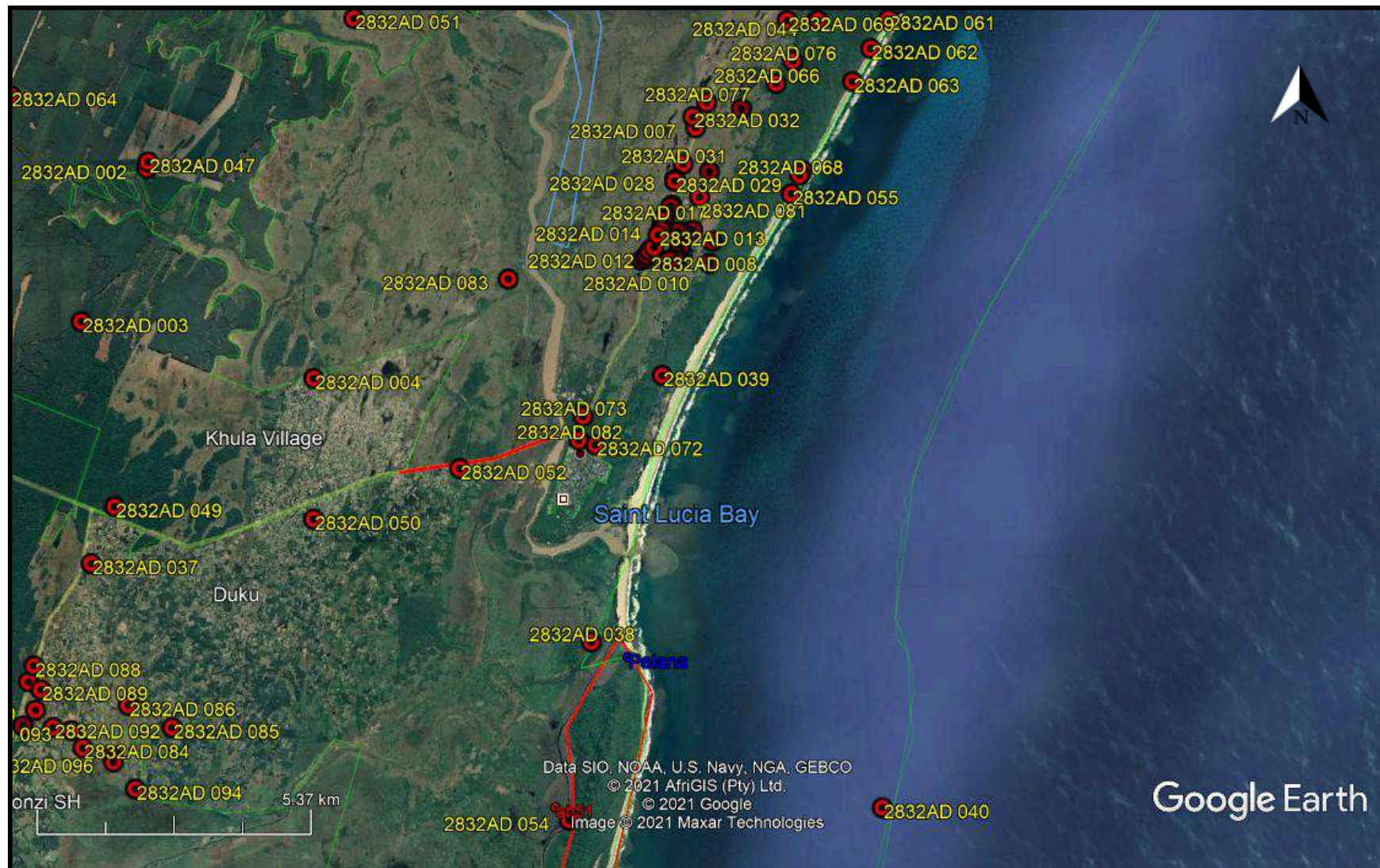


FIG. 6: STUDY AREA IN 1937



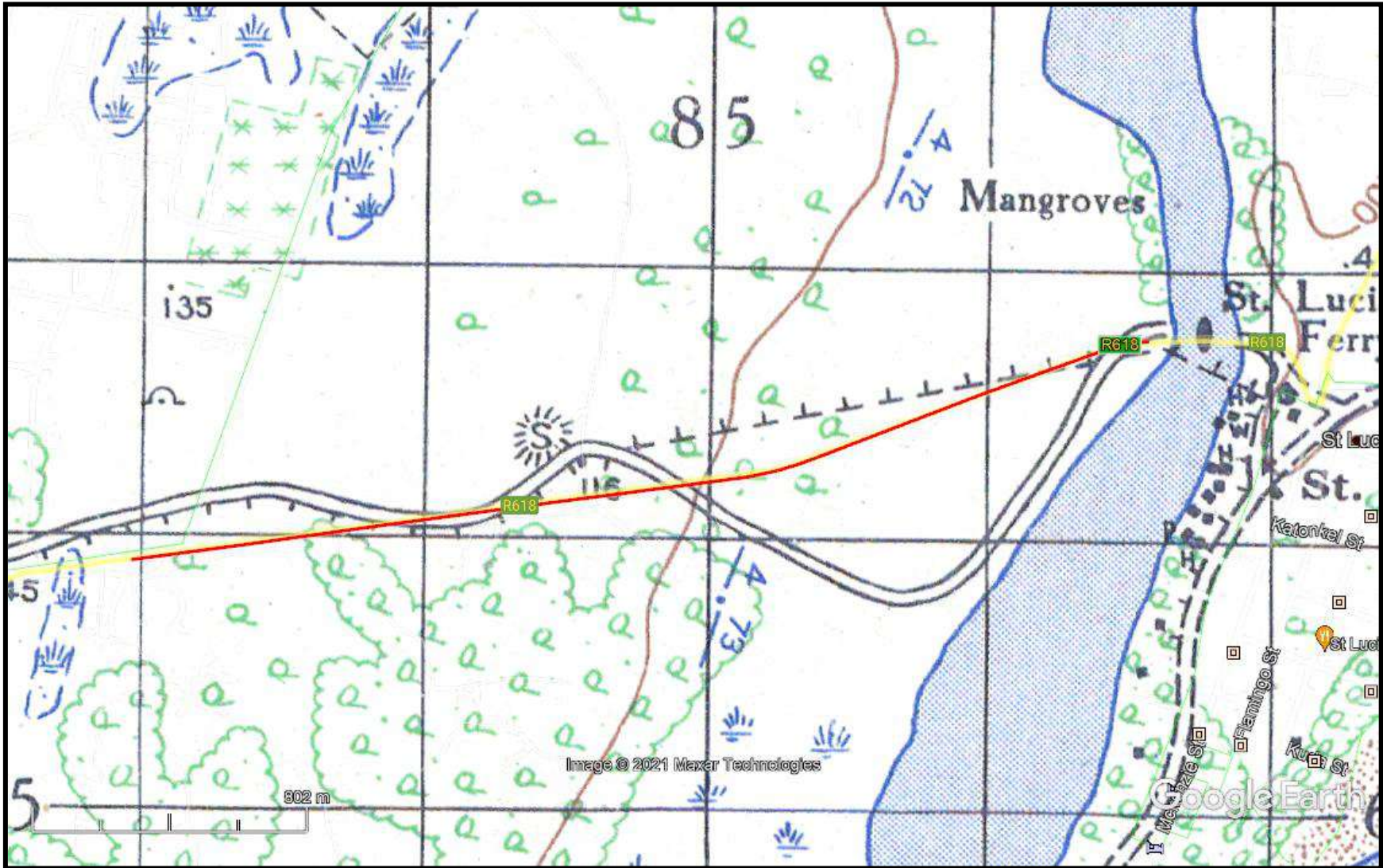
FIG. 7: STUDY AREA IN 1942

FIG. 8: 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

The desktop study concludes that there is a very low probability of archaeological and palaeontological sites occurring within the study area. No further heritage mitigation should be required.

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 stylized flourish above the name.

Gavin Anderson
Archaeologist/Heritage Impact Assessor