

7. REGISTRATION AND COMMENTS

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Please fill in particulars and return completed document to be registered as an Interested & Affected Parties (I&AP) to:

Postal Address: Private Bag 12043, Windhoek, Namibia

Comments/Suggestions and Questions:

Dear Sir/ Madam

The National Heritage Council (NHC) acknowledges receipt of your proposed Havana relocation township establishment in Windhoek Khomas region. Your approach in requesting comments/suggestions and questions is commendable.

The NHC recommends a Heritage Impact Assessment (HIA) study for the proposed relocation for Township Establishment for Windhoek Havana. The main reason is that Windhoek is known to have substantial heritage resources in all its constituencies. It is therefore recommended that your study should include the extent of the impact, the magnitude as well as the duration of the impact on the heritage resources posed by the development. Naturally such developments have irreversible damage to heritage resources.

The NHC therefore recommends that you appoint a person with appropriate professional qualifications and/or experience to conduct heritage impact assessment study of the area as per the National Heritage Act; Act 27 of 2004.

We look forward hearing from you

Yours in Heritage Conservation and management



Mrs Erica M. P. Ndalikokule
Acting Director
National Heritage Council of Namibia



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17 November 2020

Matrix Consulting Services
Windhoek
Namibia

For attention: Mr Spike Shippiki, Environmental Practitioner

**ARCHAEOLOGICAL ASSESSMENT OF HAVANA RELOCATION DEVELOPMENT, WINDHOEK
TOWNLANDS, NAMIBIA**

DECLARATION

I hereby declare that I do:

- (a) have knowledge of and experience in conducting assessments, including knowledge of Namibian legislation, specifically the National Heritage Act (27 of 2004), as well as regulations and guidelines that have relevance to the proposed activity;
- (b) perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- (c) comply with the aforementioned Act, relevant regulations, guidelines and other applicable laws.

I also declare that I have no interests or involvement in:

- (i) the financial or other affairs of either the applicant or his consultant
- (ii) the decision-making structures of the National Heritage Council of Namibia.



John Kinahan, Archaeologist

EXECUTIVE SUMMARY

An archaeological/heritage field survey was carried out on the site of the proposed Havana Relocation Development project on the northern margins of the Windhoek Townlands. The project site had been extensively disturbed by earthmoving in advance of the survey, altering or removing up to 70% of the natural surface and with it any archaeological remains that may have been present. The grave of a woman named Amalia /Homes, buried on the site in the 1960s is well preserved and protected by a chain-link fence. It is recommended that the project proponent should discuss the possible relocation of the grave with the National Heritage Council, should the development encroach on the site. It is also recommended that the project adopt the attached Chance Finds Procedure in the event that buried remains are found in the course of site works.

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1. INTRODUCTION

1.1 Background

Matrix Consulting Services is carrying out an environmental assessment of a portion of the Windhoek Townlands designated for the Havana Relocation Development project. Urban expansion is listed in the Environmental Management Act (2007) as an activity requiring environmental assessment and the issuance of an Environmental Clearance Certificate.

Archaeological remains in Namibia are protected under the National Heritage Act (2004) and National Heritage Regulations (Government Notice 106 of 2005), and Matrix has accordingly appointed the undersigned, J. Kinahan, archaeologist, to carry out an assessment of the project Aol. A field visit to the site was carried out on 17th November 2020.

1.2 Terms of Reference

The primary task of the archaeological assessment reported here was to identify sensitive archaeological/heritage sites that could be affected by the proposed urban expansion. The assessment forms the basis of recommended management actions to avoid or reduce negative impacts, as part of the overall environmental assessment. The study is intended to satisfy the requirements of the relevant legislation and regulations, in which the process of review and clearance may require further, or different mitigation measures to be adopted.

Specifically, the archaeological/heritage assessment addresses the following primary elements:

1. The identification and assessment of potential impacts on archaeological/heritage resources, including historical sites arising from the proposed exploration and mining activities.
2. The identification and demarcation of sensitive archaeological/heritage sites requiring special mitigation measures to eliminate, avoid or compensate for possible destructive impacts.
3. Formulation and motivation of specific mitigation measures for the project to be considered by the authorities for the issuance of clearance certificates.
4. Identify permit requirements as related to the removal and/or destruction of heritage resources.

1.3 Assumptions & Limitations

Archaeological assessment relies on the indicative value of surface finds recorded in the course of field survey. Field survey results are augmented wherever possible by inference from the results of surveys and excavations carried out in the course of previous work in the same general area as the proposed project, as well as other sources such as historical documentation. Based on these data, it is possible to predict the likely occurrence of further archaeological sites with some accuracy, and to present a general statement (see Receiving Environment, below) of the local archaeological/heritage site distribution and its sensitivity. However, since the assessment

is limited to surface observations and existing survey data, it is necessary to caution the proponent that hidden, or buried remains might be exposed as the project proceeds

2. LEGAL REQUIREMENTS

The principal instrument of legal protection for archaeological/heritage resources in Namibia is the National Heritage Act (27 of 2004). Part V Section 46 of the Act prohibits removal, damage, alteration or excavation of heritage sites or remains. Section 48 *ff* sets out the procedure for application and granting of permits such as might be required in the event of damage to a protected site occurring as an inevitable result of development. Section 51 (3) sets out the requirements for impact assessment. Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council. Heritage sites or remains are defined in Part 1, Definitions 1, as “any remains of human habitation or occupation that are 50 or more years old found on or beneath the surface”.

It is important to be aware that no specific regulations or operating guidelines have been formulated for the implementation of the National Heritage Act in respect of archaeological assessment. However, archaeological impact assessment of large projects has become accepted practice in Namibia during the last 25 years, especially where project proponents need also to consider international guidelines. In such cases the appropriate international guidelines are those of the World Bank OP/ BP 4.11 in respect of “Physical Cultural Resources” (R2006-0049, revised April 2013). Of these guidelines, those relating to project screening, baseline survey and mitigation are the most relevant.

Archaeological impact assessment in Namibia may also take place under the rubric of the Environmental Management Act (7 of 2007) which specifically includes anthropogenic elements in its definition of environment. The List of activities that may not be undertaken without Environmental Clearance Certificate: Environmental Management Act, 2007 (Govt Notice 29 of 2012), and the Environmental Impact Assessment Regulations: Environmental Management Act, 2007 (Govt Notice 30 of 2012) both apply to the management of impacts on archaeological sites and remains whether these are considered in detail by the environmental assessment or not.

3. THE RECEIVING ENVIRONMENT

The proposed urban expansion is to be carried out on a portion of the Townlands of Windhoek as indicated in Figure 1. The Havana Relocation Development site lies close to the outer limits of informal settlement on the northern margins of Windhoek. Prior to the site visit reported here extensive civil works had already taken place, involving clearance of most woody vegetation, construction of major roadworks, and excavation of trench lines for water and sewerage services. These works have altered the ground surface over between 60 and 70% of the Havana Relocation Development site, effectively removing most of the ground surface that might have contained archaeological/heritage remains

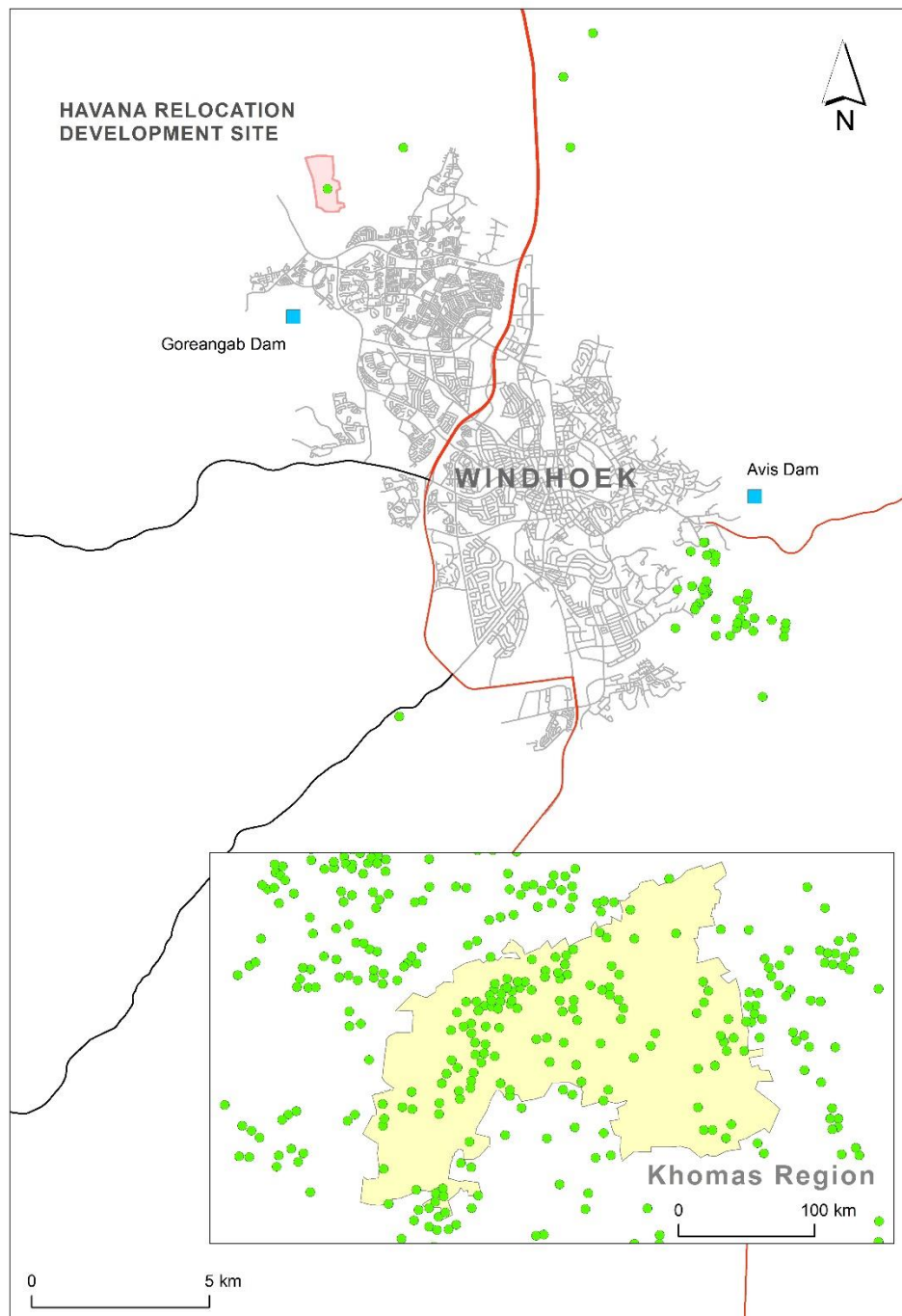


Figure 1: The Havana Relocation Development Site, showing the known distribution of archaeological sites (green dots) in the adjacent area and regions.

Earlier surveys in the Windhoek Townlands have revealed a fairly well preserved archaeological record covering most of the last one million years. The archaeological site distribution in Figure 1 shows that the Khomas Region is relatively rich in archaeological remains although only a small part of the Windhoek Townlands have been surveyed in detail, mainly in the course of archaeological assessments for the on-going Southern Bypass project.

In general, the archaeology of the Windhoek Townlands has the following major characteristics:

- a. **Early to mid-Pleistocene (ca. 2my to 0.128my; OIS 6, 7, 19 &c):** represented by surface scatters of stone tools and artefact debris, usually transported from original context by fluvial action, and seldom occurring in sealed stratigraphic context.
- b. **Mid- to upper Pleistocene (ca. 0.128my to 0.040my; OIS 3, 4 & 5a-e):** represented by dense surface scatters and rare occupation evidence in sealed stratigraphic context, with occasional associated evidence of food remains.
- c. **Late Pleistocene to late Holocene (ca. 0.040my to recent; OIS 1 & 2):** represented by increasingly dense and highly diverse evidence of settlement, subsistence practices and ritual art, as well as grave sites and other remains.
- d. **Historical (the last ca. 250 years):** represented by remains of crude buildings, livestock enclosures, wagon routes and watering points, as well as graves, comprising small cemeteries near farm settlements or isolated burial sites.

In summary, most archaeological remains found in the Windhoek Townlands are surface occurrences. These are primarily scatters of stone artefacts or isolated finds that have been moved from their original context by sheet erosion due to the high slope angle of the terrain in this area. Heritage sites relating to the historical period relate mainly to farming settlement on the margins of the city and to the remains of early colonial military outposts.

3.2 Observations

A detailed foot survey of the area indicated in Figure 1 found no significant archaeological sites. A single grave is situated near the middle of the project area and apparently dates to the early 1960s burial of a woman named Amalia /Homes who was born in the 1890s (see Figure 2). The grave is oriented to the east and has a cement apostolic style cross, and a white-painted brick kerb. The grave has been fenced and is under no immediate threat. There are the remains of a borehole approximately 30m to the south of the grave and the remains of a brick water reservoir approximately 400m to the west. Taken together, these remains suggest that Amalia /Homes lived and died at a cattle-post on the edges of the city. The cattle-post was probably moved to make way for the sewerage ponds that lie on the north-western margins of the proposed Havana Relocation Development Site.

While the Havana Relocation Development Site is therefore considered to have a low archaeological/heritage sensitivity this is mainly due to the fact that site preparation works have probably removed most archaeological traces. However, the grave of Amalia /Homes would be specifically protected in terms of both the National Heritage Act (27 of 2004) and the Burial Place Ordinance (27 of 1966).



Figure 2: The grave of Amalia /Homes showing protective fencing, viewed from the south east. Also visible is the extensive clearing of the surrounding site.

4. CONCLUSIONS & RECOMMENDATIONS

The grave site of Amalia /Homes is at present adequately protected. However, should the intended development of the Havana Relocation Development Site encroach upon the grave it may need to be relocated. The project proponent should discuss this with the National Heritage Council to make certain that the relocation is carried out according to the correct procedures.

No archaeological sites requiring further investigation or mitigation were located in the course of the survey. It is however recommended that the proponent should adopt the Chance Finds Procedure in Appendix 1 as part of the project Environmental Management Plan.

I hope you will find this report satisfactory

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Kinahan', is written over a light grey rectangular background.

J. Kinahan PhD

Appendix 1: Chance Finds procedure

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found in the course of development work. The procedure set out here covers the reporting and management of such finds.

Scope: The “chance finds” procedure covers the actions to be taken from the discovery of a heritage site or item, to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “ a person who discovers any archaeological ... objectmust as soon as practicable report the discovery to the Council”. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Responsibility:

Operator	To exercise due caution if archaeological remains are found
Foreman	To secure site and advise management timeously
Superintendent	To determine safe working boundary and request inspection
Archaeologist	To inspect, identify, advise management, and recover remains

Procedure:

Action by person identifying archaeological or heritage material

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman

- a) Report findings, site location and actions taken to superintendent
- b) Cease any works in immediate vicinity

Action by superintendent

- a) Visit site and determine whether work can proceed without damage to findings
- b) Determine and mark exclusion boundary
- c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by archaeologist

- a) Inspect site and confirm addition to project GIS
- b) Advise NHC and request written permission to remove findings from work area

c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

- a) Actions as above
- b) Field inspection by archaeologist to confirm that remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.

