

Memorandum

To	Nokukhanya Khumalo	From	Reuben Heydenrych (Zutari)
Copy		Our reference	1002100
Date	2023-04-03	Pages (including this page)	2
Subject	Re-submission of the amended version of the Specialist Heritage Report recommendations		

Dear Ms Nokukhanya Khumalo,

The comment from the South African Heritage Resources Agency (SAHRA), dated 13 March 2023, bears reference.

We note that the SAHRA Development Applications Unit (DAU) has accepted the submission of the Part 2A Amendment report, Palaeontological Desktop Study, and Heritage Impact Assessment (HIA) reports on the conditions that the recommendations provided by the heritage specialists are supported and adhered to; conditions which include, amongst various recommendations listed, a **100m** buffer zone around site MGSP 3 (a cemetery).

We note that the final comment given by SAHRA was based on the specialist recommendations that were on the specialist report dated **14 July 2022**. Zutari (herein referred to as the Environmental Assessment Practitioner (EAP)) would like to highlight to the DAU that MGSP 3 is classified as a single grave and not a cemetery.

The EAP would also like to highlight that there were four (4) different versions of the Heritage report submitted to the EAP by PGS Heritage. The version that was uploaded onto the SAHRIS website for review and final comment on 2 February 2023 is the **third version** that is dated 14 July 2022. On 8 February 2023, PGS Heritage submitted the last and final version (**fourth version**) of the Heritage report, dated 7 February 2023, to the EAP.

We would like to refer the case officer to page 79 of version 4 of the February 2023 report (attached). The buffer area around the grave MGSP 3 is recommended to be **30m**, a decrease from the **100m** buffer zone that was recommended in the version 4 of the HIA report. The relevant section from the version 4 of the report reads as follows:

"As cemeteries and graves have Medium to High Heritage Significance, the best option for sites such as these is to allow for their in-situ preservation. In such cases, the SAHRA BGG Permitting Policy requires a buffer area of at least 100m for mining developments and a buffer area of at least 30m for non-mining developments. The definition of the proposed development was confirmed as a non-mining development via correspondence between PGS and the SAHRA BGG during one of the previous project phases. As a result, a 30m buffer area around this site would be sufficient to preserve the site. However, should it not be possible to preserve this site in situ using this 30m buffer area, the required mitigation measures are outlined below."

Zutari would like to request the DAU to amend its recommendations for the size of the buffer accordingly.

We trust that the SAHRA DAU will find the above in order. We appreciate the SAHRA's support to efficiently review the HIA report.

Please contact Mr Reuben Heydenrych should you require further clarifications on the abovementioned.

Kind regards,

Reuben Heydenrych *M. Phil. Environmental Science, BL. Arch*

MANAGER, ENVIRONMENT AND PLANNING | ZUTARI

