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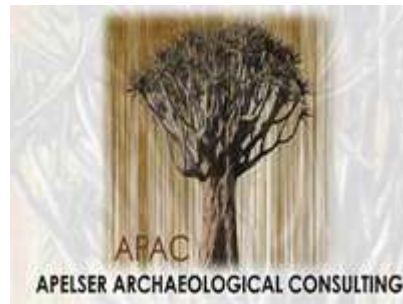
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Comprehensive and Professional Solutions for all Heritage Related Matters

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VAT NO.: 4360226270

2019-08-28

To: Whom it May Concern

RE: MOTIVATION TO INVESTIGATE, EXHUME AND RELOCATE GRAVES LOCATED AT THE PROPOSED SENWABARWANA MALL DEVELOPMENT ON PORTION 6 OF THE FARM BORKUM 143LS IN SENWABARWANA, LIMPOPO PROVINCE

APelser Archaeological Consulting (APAC) was appointed by Molshe Business Solutions to conduct a Phase 1 HIA for the proposed Senwabarwana Mall Development located on Portion 6 of the farm Borkum 143LS. The proposed development and study area is located in Senwabarwana, Limpopo Province.

Background research indicated that there are some cultural heritage sites and features in the larger geographical area within which the study area falls, but that there no known sites on the specific land parcel. Besides an informal grave yard with some unidentified graves on it, the assessment of the specific study area did not identify any sites, features or material of cultural heritage (archaeological and/or historical) origin or significance (**See Report APAC109/53 – May 2019**).

The grave site located and recorded is an informal grave yard containing between 10 & 15 unknown graves that will be impacted by the development. Most of the graves here are stone-packed with no headstones, while there are 2 graves with cement headstones and that have cement borders. There are no inscriptions on these graves and at this stage the graves are therefore unknown in terms of identities of the deceased buried there and well as the age of these graves. They are therefore regarded currently as older than 60 years of age and protected by the National Heritage Resources Act.

Graves always carry a High Cultural Heritage Significance rating and should preferably be protected and not impacted by any development. Two options exist regarding the handling of graves and grave sites in terms of the impacts of development. The best practice would be to steer clear of the grave site and fence it in to ensure its protection. The site should then be managed through a Heritage Management Plan.

The 2nd option is the Investigation, Exhumation and Relocation of the graves that will be impacted on by the development. Because the grave site and graves on it is located within the development footprint it was also the opinion of the heritage specialist that it cannot be incorporated in and managed as part of the proposed development. The grave site and graves will therefore be directly impacted on by the proposed Senwabarwana Mall development and suitable mitigation measures will have to be implemented as a result.

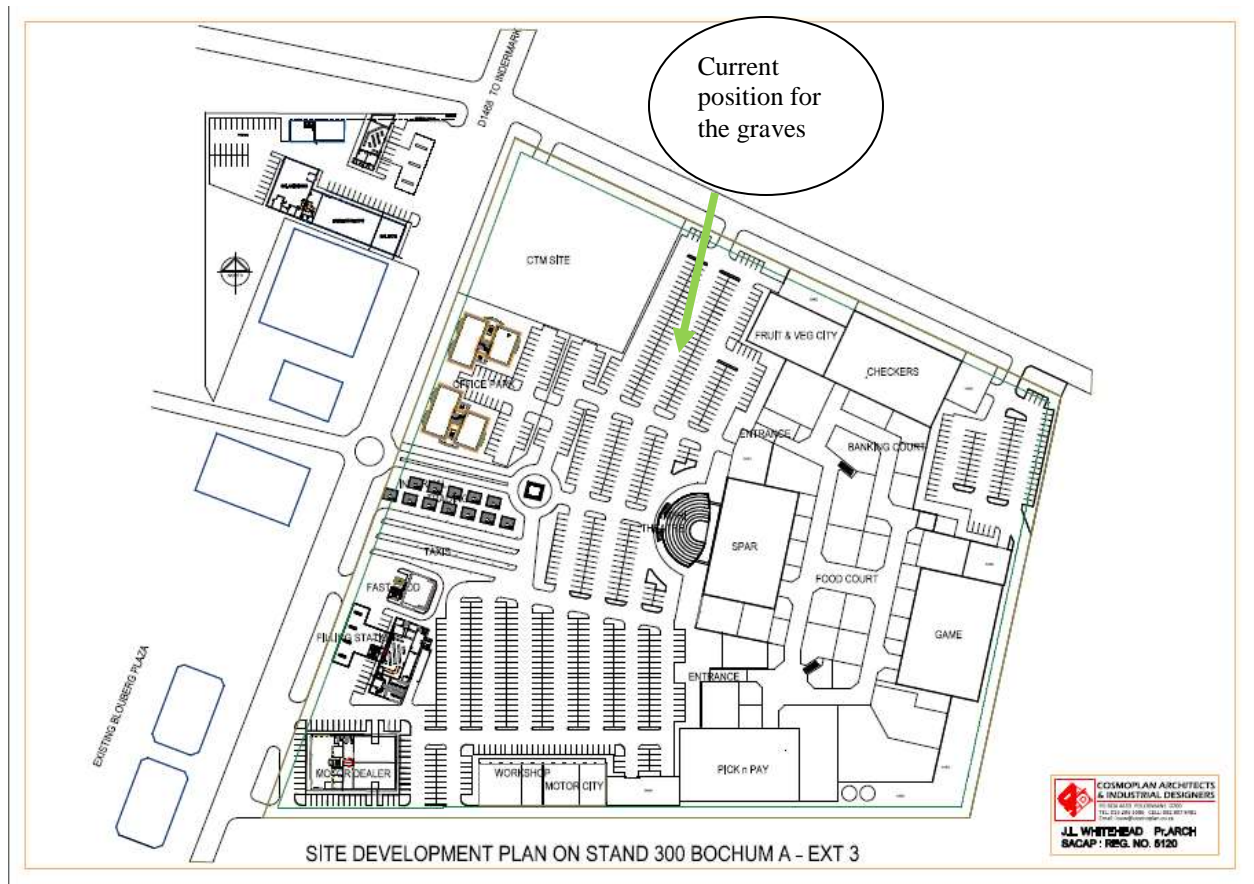
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Beatrix Bed & Breakfast Trading as A Pelser Archaeological Consulting

The investigation, exhumation and relocation of the graves will entail detailed and extensive social consultation to try and locate any possible descendants of the deceased and to obtain consent for the exhumations and relocations. This will include the erecting of Site Notices indicating the intent to develop and to exhume & relocated the graves from the location; Newspaper Advertisements and if required radio announcements as well. Once this has been done various permits will have to be obtained before the work is conducted. This will include a permit from SAHRA's Burial Grounds and Graves Unit (BGG), Provincial and National Departments of Health and COGTA. For this a recognized Undertaker, experienced & skilled in Grave Exhumation and Relocation work, will have to be consulted as well.

SAHRA has subsequently provided Final Comments (Case ID#13992) on this report and the recommendations made in it on the 19th of August 2019. In this letter SAHRA's Archaeology, Palaeontology and Meteorites (APM) Unit Indicates that they accept the HIA report submitted to the case for commenting and has no objection to the development going ahead. Furthermore, the Burial Grounds and Graves (BGG) Unit recommended that the cemetery must be retained in situ, and fenced with an access gate. Before fencing may occur, permission from the family members must be obtained. This must be done by undertaking a social consultation process to identify the family members of the site. This must be done in terms of Chapter IX of the NHRA Regulations and section 36(3) of the NHRA.

Should it be impossible to retain the cemetery, as clear impacts and direct mitigation measures have not be mentioned in the HIA report, then a strong motivation must accompany a section 36 (3) grave relocation permit application. The comments and responses obtained during public participation, and contained within Appendix G of the Final BAR, must be submitted to the case. This letter serves as motivation for the investigation, exhumation and relocation of the graves from the site. The graves are located directly in the footprint of the development and direct negative impacts on the graves as a result of development actions cannot be avoided by the fencing-in of the site. The graves on sites will make it impossible for the customers to enjoy their shopping around the mall. The people have a cultural believe that dead people need their peace, so having the graves fenced-in there will be against their cultural believes.



At a Public Meeting held on the 18th of July 2019 at the Municipal Chambers in Senwarbarwana members of the community that attended indicated that they did not know who these graves belong to as the graves are older than them and that there should be no objections to their relocation. They want the development to proceed as they see it as an opportunity for job creation and an economic boost to Senwarbarwana.

Should there be any questions regarding this project and the processes to be followed please contact the undersigned.

Kind regards

Anton Pelser

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