



an agency of the  
Department of Arts and Culture

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CaseID: 10345

Date: Tuesday June 13, 2017

Page No: 1

## Interim Comment

### In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mlangeni Family Trust

### Environmental Authorisation and Water Use Licence Applications for the following project: Belfast Mall and Mixed Use Development

APelser Archaeological Consulting cc and Dr Gideon Groenewald were appointed by Labesh (Pty) Ltd on behalf of Mlangeni Family Trust to conduct a Heritage Impact Assessment and a Palaeontological Desktop Study for the proposed Belfast mall and mixed use development. These studies are in support of an Environmental Authorisation application in terms of the National Environmental Management Act, no. 107 of 1998 (NEMA) and NEMA Environmental Impact Assessment (EIA) Regulations, 2014. The proposed development is located on Portion 12 of Wemmershuis 379 JT and the remainder of Berg-en-dal 981 JT in the Emakhazeni Local Municipality of Mpumalanga Province. The extent of the proposed development footprint will be 53.90 ha a total of 117.57 ha of the project area, construction will consist of medium and high density housing units, access roads, utilities infrastructure and mixed use buildings among other infrastructure plans.

*Pelser, A.J. April 2016. Phase 1 HIA Report for Proposed Residential and Commercial Development on the Remainder of Portion 12 of the farm Wemmershuis 379 JT and the remainder of Berg-en Dal 981 JT near Belfast, Mpumalanga Province.*

The study area is partially located within the Anglo-Boer War battlefield of the Battle of Berg-en-dal. The battlefield is now used as agricultural crop fields and grazing fields and a coal mine conveyor belt rollers have been dumped on portions of the project area. Other features relating to the Battle of Berg-en-dal include some trenches identifiable by the remains of stone walling, and an old wagon route that passed 50 m away from the N4 motorway, in previous years an old coach house was excavated which was located close to the wagon route. The route is listed as low to medium significance. A farmstead house is located on the farm Wemmershuis, the house is partially stone built and with modern alterations using clay bricks, this site is listed as medium to high significance. All these identified heritage resources are located within the proposed house areas and will be impacted by the development. The author recommends the following:

A Phase 2 HIA for the recording and mapping of the old wagon route, the farmstead house and the trenches that may be related to the battle of Berg-en-dal.



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Page No: 2

The proposed development will directly impact on all the identified heritage resource, when comparing the development plans with the map showing the distribution of the sites. All the above recommendations will apply.

*Groenewald, G. April 2016. Palaeontological desktop study for the Proposed Development on PTN 12 of Wemmershuis 379 JT and the Remainder Van Bergendal 981 JT, Emakhazeni Local Municipality, Nkangala District Municipality, Mpumalanga Province.*

The project area is underlain by Vaalian aged dolerite and Permian aged coarse grained sandstone and shale with coal beds of the Vryheid Formation, Ecca Group, Karoo Supergroup. This formation is very highly sensitive to the occurrence of fossiliferous plant impressions in the shale and sandstone rocks. From the desktop survey and analysis of Google Earth images the proposed development area is covered by deep sandy soil with no exposed rock outcrops. The author recommends the following:

1. The EAP as well as the ECO for this project must be made aware of the fact that the Vryheid Formation of the Ecca Group is Highly significant for fossil remains of plant and trace fossils, albeit mostly where good outcrops are available for inspection.
2. In areas that are allocated a Very High Palaeontological sensitivity and specifically where deep excavation into bedrock is envisaged (>1.5m, following the geotechnical investigation), or where fossils are recorded during the geotechnical investigations, a qualified palaeontologist must be appointed to assess and record fossils at specific footprints of infrastructure developments (Phase 1 PIA).
3. These recommendations should form part of the EMP of the project.

## Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts and endorses the recommendations within the Heritage Impact Assessment (HIA) and Palaeontological Desktop Study. The recommendations within the HIA Report must be implemented as the heritage sites will be impacted, and the following mitigation measures must be included within the EMP for compliance.

- A report of the geotechnical investigation must be provided to a palaeontologist to determine whether further monitoring by a palaeontologist should be carried out during construction phase of the development.
- If the findings of the palaeontologist supports monitoring by a palaeontologist during construction, then



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Page No: 3

the appointed palaeontologist must apply for a section 35 permit for the collection of any fossils uncovered during construction. The frequency of the monitoring must be agreed upon with Mlangeni Family Trust, the ECO and the palaeontologist.

- The Anglo Boer War trenches are older than a 100 years old and require a section 35 permit for Phase 2 HIA for the recording and mapping and mitigation consisting of test pits to find out if there is any archaeological deposit.
- An archaeologist must be appointed to monitor all ground clearance and excavation activities during the construction phase. A report of the monitoring must be submitted to the case for comments.
- A sign post on the property needs to be erected which will also be visible to public, the sign post must contain the history of the battle of Berg-en-dal and also a map of the battlefield which the proposed development lies partially on. The signpost must also contain directions to the Berg-en-daal memorial down the road.
- All the other identified heritage resources within the HIA report (farmhouse and require comments and permits from the Mpumalanga Provincial Heritage Resources Authority (MPHRA), as they are generally protected under section 34 which it has competency to assess. The contact details of MPHRA are Mr Benjamin Moduka: 013 766 5196 [bmoduka@mpg.gov.za](mailto:bmoduka@mpg.gov.za).

SAHRA will issue Final Comments on this case once the EIA report is submitted to this case and the conditions listed above are incorporated into the EMP. The extent of the development must be mapped in detail on the SAHRIS Location Information map, a point will not suffice. A .kml map of the development can be uploaded to the GISLayer section in the case edits tab.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

Our Ref: 10345



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Page No: 4

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John Gribble  
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Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/375123>  
(DARDLA, Ref: )