



an agency of the
Department of Arts and Culture

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CaseID: 11112

Date: Friday July 21, 2017

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Interim Comment

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

Attention: Enpact Environmental Consultants CC

Phase 1 Archaeological and Heritage Impact Assessment on the farm Bruintjieslaagte 465 JT in respect of the proposed construction of an irrigation dam, Mpumalanga Province.

Joubert and Seuns (Pty) Ltd is proposing to construct a dam wall that will be 23.6 m high and 340 m in length, 13 hectares in extent with a capacity of 1 00 000 m³. The dam wall will be constructed across the Devil's Creek River, a tributary of the Crocodile River. The proposed project will be located on Portion of the farm Bruintjieslaagte 465 JT, in the area of Schoemanskloof in the Mbombela Local Municipality of Mpumalanga Province.

Enpact Environmental Consultants cc have been appointed Joubert and Seuns (Pty) Ltd to conduct an Environmental Impact Assessment in support of an Environmental Authorisation, in terms of the National Environmental Management Act, 107 of 1998, as amended (NEMA). A Heritage Impact Assessment by Kudzala Antiquities cc and a Desktop Assessment by Prof M. Bamford has been submitted to SAHRA, in terms of section 38 (8) of the National Heritage Resources Act, 25 of 1999 (NHRA).

Celliers, J.P. April 2017. Phase 1 Archaeological and Heritage Impact Assessment on the farm Bruintjieslaagte 465 JT in respect of the proposed construction of an irrigation dam, Mpumalanga Province.

The author undertook a field based assessment of the development area to determine whether potential heritage resources will be impacted by the proposed development. Seven archaeological sites were identified within the proposed development area number BL1 to 7, most of the sites consist of Later Iron Age remains of stone walled settlements with one historic stone walled enclosure. The Later Iron Age remains (sites BL2 to 7) form part of one single occupation (Village), with sites BL 2 being directly impacted by the dam wall construction and BL 4 and 4B will be directly impacted by the flooding once the dam construction is completed. As these sites form part of the large pre-colonial settlement complex consisting of site BL2 -7 there is cumulative impacts to all the sites constituting the settlement complex.

Site BL 1 is a rectangular shaped homestead building that dates back to before 1942. This site is located outside the proposed dam wall and flood zone and the proposed development will not impact on this site.



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The author recommends that BL2 and 4 must be properly documents and certain features to be excavated before they are submerged.

Bamford, M. April 2017. Palaeontological Impact Assessment for the proposed construction of a dam wall on farm Bruintjieslaagte 465 JT, in the Schoemanskloof Valley, Mpumalanga Province. Desktop Study.

The author undertook a desktop study of the underlying geology of the project area, to determine the potential palaeontological sensitivity and possible impacts by the development. The underlying geology consists of shale, quartzite, conglomerate, breccias and diamictites of the Timeball Hill Formation, Pretoria Group, and nearby occurrences of unfossiliferous igneous rocks. No record of trace fossils have been identified or recorded for the Timeball Hill Formation within the Nelspruit area and there have also been no reports of fossils being identified in the Quaternary sands of the Nelspruit area. The author determines the probability of affecting fossils during construction of the dam wall are unlikely as the rocks are too old or volcanic in origin.

Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the Palaeontological impact Assessment report, however the author of the Heritage Impact Assessment report did not survey the entire proposed project area, and also concentrated his survey along gravel roads as seen from his tracklog. The HIA report does not conform to section 38(3) of the NHRA as well as SAHRA 2007 minimum standards guideline document. In addition SAHRA disagrees with some of the recommendations provided in the report and SAHRA requires that the following recommendations are included in a amended HIA report as follows:

- Sites BL2 -7 form part of one pre-colonial settlement complex, and the destruction of 2 of the sites (BL2 and BL4 and 4B) constitute higher cumulative impacts to all the sites. The entire settlement complex (BL2 – 7) must be mapped using standard academic techniques and stlye for stone walled sites. The detailed map must be included in the section 35 mitigation permit application for mitigating sites BL2 and BL4.
- A section 35 Permit application must be applied for, by the appointed archaeologist, to mitigate sites BL2 and BL4.
- A Chance Fossil Finds Procedure must be drafted and included in the EMPPr. The procedure should be implemented if any fossils are uncovered in the construction of the dam wall.
- The ECO as part of the EMPPr must monitor all ground clearance, excavations and construction activities in the sections of the project. A report of the monitoring must be submitted to SAHRA at the end of the construction phase.

In addition a new field survey must be carried out and the results of that survey included in the new amended



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HIA.

SAHRA will comment further once the above is carried out and the amended HIA is submitted to the case. All the appendices for the EIA report must be submitted to the case.

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

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

John Gribble
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/398868>