



Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 11377

Date: Friday September 08, 2017

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Interim Comment

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

Attention: Mpumalanga Tourism and Parks Agency

MP-MDALA MKHOMBO DEVELOPMENT AND UPGRADING OF INFRASTRUCTURE” IN THE FOLLOWING AREAS:

Ecorite Consultants (Pty) Ltd have been appointed by Green Vision Consulting cc on behalf of Mpumalanga Tourism and Parks Agency (MTPA), to conduct a Heritage Impact Assessment of the proposed upgrading of and construction of a new tourism and recreational facilities for the Mkhombo Nature Reserve and the Mdala Nature Reserve. The Heritage Impact Assessment report was conducted by Ecorite in terms of section 38(8) of the National Heritage Resources Act, Act no. 25 of 1999. The assessment was carried out as part of a Basic Assessment Process in terms of the National Environmental Management Act, Act no. 107 of 1998 (NEMA), and NEMA Environmental Impact Assessment (EIA) Regulations, 2014/2017 as amended.

Matenga, E. June 2017. Mdala Mkhombo Development and Upgrading of Infrastructure Heritage Impact Assessment Requested in terms of Section 38 of The National Heritage Resources Act (no 25/1999).

MTPA is proposing to refurbish the existing buildings on the Mdala Nature Reserve which were constructed in 1990 when the reserve was established. There are 13 tourist facility areas within the Mdala Nature Reserve which the author surveyed to determine whether there are any visible heritage resources present. The results of the survey for this section found no heritage resources.

MTPA is proposing to construct new recreational facilities along the northern shore of the dam in Mkhombo Nature Reserve. The only infrastructure within this vicinity is the rubble remains left behind from the construction of the dam in the 1980's. This includes a concrete manufacturing plant, remains of small kitchen/shop, concrete and sand rubble heaps and a rectangular concrete foundation all thought to be less than 60 years in age and not protected in terms of the NHRA. There is also a rocky outcrop with some aloes growing around the brush, which the author thinks are culturally important to the area as it was previously a Ndebele area.

Author's Recommendations:

As the identified structures are less than 60 years in age, they are not protected in terms of the NHRA and no



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

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further mitigation is required.

The stand of aloes should be incorporated into the development by replanting the aloes into the green spaces around the development.

For the Mkhombo new construction area, the author recommends that alternative site A is chosen as the preferred site in terms of heritage.

If any unmarked graves are uncovered during construction then the graves must be relocated.

If any heritage resources are uncovered then SAHRA must be notified immediately and a heritage expert called in to inspect the finds.

Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot accept the HIA as it does not conform to the minimum required information stipulated in section 38(3) of the NHRA. Furthermore SAHRA does not agree with some of the recommendations provided in the HIA report and instead the following recommendations are a standard for all graves and heritage resources uncovered during construction:

- If any unmarked graves are uncovered, then SAHRA and an archaeologist must be notified immediately. Construction must stop in the immediate vicinity of the activity areas and the appointed archaeologist must inspect the finds, and a report of the findings must be submitted to SAHRA for review. Depending on the recommendation of the findings, a public consultation process as stipulated in Chapter XI of NHRA Regulations, 2002 must be undertaken in support of a graves relocation permit application as defined in Chapter IX of the NHRA Regulations, 2002.
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- If any heritage resources are uncovered during the construction phase, all activities within a 30 m radius must cease immediately and an archaeologist or palaeontologist depending on the nature of the finds, must be called in to inspect the findings. A report detailing the findings and recommendations must be written and submitted to SAHRA for decision making.

The HIA report must be amended to include the following additional information before SAHRA is able to issue further comments:

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- The description of the new construction area, and any other infrastructure required like water systems. If there is a layout plan for this area then it should be included in the report, if there is not a final layout map of the new recreational features, one must be made and included in the report.
- The author also did not supply his tracklog in the HIA report nor does he specify clearly if he carried out an assessment of any potential archaeological resources. The author must amend the report to include a tracklog and a clear assessment of any potential archaeological resources including a literature review of previous archaeological studies within the locality.
- The report also does not indicate whether an assessment of palaeontological resources was conducted by a professional palaeontologist. There is also no summary of such an assessment in the report. SAHRA requires that a Palaeontological Desktop Assessment of the development area is conducted by a suitably qualified palaeontologist and the report must be submitted to SAHRA for commenting.

Furthermore, the Basic Assessment report and its appendices must also be uploaded to the case on SAHRIS.

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

Phillip Hine
Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

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ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/405844>
(DEA, Ref: 14/12/16/3/3/1/1796)