



an agency of the
Department of Arts and Culture

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CaseID: 11622

Date: Wednesday November 23, 2022

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Letter

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

Attention: Mr Neels Kruger

Coastal & Environmental Services - East London

ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) FOR THE IMPROVEMENT OF NATIONAL ROUTE R510 SECTION 2 FROM KM 6.3 AT BIERSPRUIT BRIDGE TO KM 33.4 NEAR THABAZIMBI, THABAZIMBI LOCAL MUNICIPALITY, WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

SANRAL (SOC) Ltd appointed EOH Coastal and Environmental Services (Pty) Ltd who in turn appointed Exigo Sustainability (Pty) Ltd to undertake the relevant Heritage Impact Assessment (HIA). These studies were submitted to SAHRA on September 2017.

Construction has gone ahead and a previously unidentified and unknown burial ground has been identified during construction. A mitigation report presenting the measures undertaken to safe guard the burial grounds has been submitted to the case by CES Environmental and Social Advisory Services (Pty) Ltd.

Site Management Memorandum HERITAGE MANAGEMENT FOR A BURIAL SITE IN THE NATIONAL ROUTE R510 UPGRADE PROJECT AREA, THABAZIMBI LOCAL MUNICIPALITY, WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.

Previously identified heritage sites consists of three historical railway structures at Site EXIGO-R510UG-HP01, and a cemetery at Site EXIGO-R510UG-BP01.

The newly identified heritage consist of 3 partially fenced burials located about 10 to 15 m away from the proposed road reserve. Some vegetation clearance was undertaken within the enclosure but no further physical interventions have occurred.

Temporary mitigation measures include demarcating the site with construction barricade, and

By the time the memorandum was written a permanent fence around the site was erected.

There will be a 6m distance between the constructed fence line and the road that will act as a buffer zone.

The ECO/SHEQ manager will continue monitoring of the surroundings along the approved road upgrades.

The South African Heritage Resources Agency (SAHRA) notes the following:

**AIA FOR THE NATIONAL ROUTE R510 UPGRADE NEAR THABAZIMBI,
THABAZIMBI LOCAL MUNICIPALITY, WATERBERG DISTRICT MUNICIPALITY,
LIMPOPO PROVINCE**

Our Ref: 11622



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SAHRA notes that no comments were provided to this case when it was submitted to SAHRA, and that the recommendations in the HIA were carried out by the ECO/SHEQ. As well as the submission of the site management memorandum and the mitigation measures that have been undertaken.

The SAHRA notes that the burial grounds have been fenced with a minimum 6m distance from the road and the fence line.

However, 6m buffer zone between the fence line and the road is not enough distance to conserve these graves, there is a high chance of these graves being impacted on by day to day use of the R510 by road users. SANRAL must urgently undertake a social consultation process in terms of section 36 of the NHRA and regulation XI of the NHRA 2000 Regulations to identify the Next of Kin (NOK). Permission for the relocation of the graves must be obtained from the NOK for the relocation of the graves.

Any new heritage that is identified must be reported to SAHRA and the relevant archaeologist/palaeontologist prior to construction or mitigating of the identified heritage resources.

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

**AIA FOR THE NATIONAL ROUTE R510 UPGRADE NEAR THABAZIMBI,
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Phillip Hine

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/407686>