



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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CaseID: 12785

Date: Wednesday September 26, 2018

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## Interim Comment

### In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Frox Earth Impact Consultants

### Ivydale, Holding 92, Polokwane Limpopo

Thank you for notifying SAHRA on the proposed development of Ivydale Private Hospital on Holding 92 Ivydale Agricultural Holdings Extension 1 within Polokwane Local Municipality. A Basic Assessment Report has been submitted in terms of the National Environmental Management Act, No 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations.

The proposed development location is to the south of Ivy Park and to the south west of Polokwane, Limpopo Province. The total extent of the development site is approximately 4.3820 hectares and it will consist of four components, namely Heart and Kidney Hospital, Surgical Day Hospital, Psychiatric hospital and a Stepdown hospital.

As part of the new proposed development, HCAC was contracted to conduct the HIA as part of the new EA application in terms of section 38(8) of the NHRA.

*Van der Walt, J. August 2018. Heritage Scoping Report: For the Proposed Development of a Private Hospital Located on Holding 92, Ivydale AH Extension 1, Polokwane Municipality, Limpopo Province, Limpopo Province.*

A desktop assessment was conducted of the proposed development area and found that the property has significant heritage resources on site. An Iron Age archaeological site is known to exist close to the development area according to previous records along with middens, structural remains and cultural landscape.

Graves and informal cemeteries can be expected anywhere on the location, but there are no formal grave sites in the development footprint. The report recommended that a Heritage Impact Assessment (HIA) should be conducted to confirm these resources and list their significance and co-ordinates.

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The report notes that the property in question was assessed as part of a residential township in 2002-2006. During this time, heritage assessments conducted as part of that application found several Iron Age sites within the footprint and recommended a Phase 2 Mitigation (Roodt 2006). Subsequently, a permit in terms of section 35 of the NHRA was applied for and issued (Permit No: 80/05/02/014/51) and the Phase 2 mitigation was carried out.

However, on closer inspection of our records, the Phase 2 mitigation was conducted on Erf 91, not Erf 92 (currently under application), and previous HIAs were conducted on erven 207, 208 and 224. SAHRA cannot locate the 2006 Roodt report in our records.

The SAHRA Archaeology Palaeontology and Meteorites (APM) unit supports the recommendations of the author in the Heritage Scoping Report, to do a field assessment of the property. Such a study must be conducted before a decision is made regarding the EA application, so that the impacts of the development on any identified heritage may be understood and relevant mitigation measures provided.

Therefore, an HIA report must be submitted to the case on SAHRIS, before the Final Basic Assessment Report (FBAR) is submitted for decision making. The HIA must comply with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). Additionally, the archaeology specialist reports must comply with the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments. SAHRA advises the applicant to apply for an extension of the BAR process in terms of section 19(1)b of the NEMA Regulations in order to conduct this study. Additionally, the 2006 Roodt HIA must be submitted.

Furthermore, the development area is located within an insignificant palaeontological sensitivity area, as such SAHRA APM Unit exempts the development from conducting a Palaeontological Impact Assessment (PIA).

SAHRA awaits the HIA and BAR appendices before we process the case further.

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

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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/510607>