

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 13473

Date: Wednesday June 15, 2022  
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## **Final Comment**

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Delron Environmental Assessment Practitioners

### **S24G RECTIFICATION APPLICATION: SANPARKS MANAGEMENT OFFICES, FARM HAMILTON 41, MAPUNGUBWE NATIONAL PARK, LIMPOPO PROVINCE**

Delron Environmental Assessment Practitioners has been appointed by the South African National Parks (SAN Parks) to conduct a section 24G Rectification application for the unlawful commencement of the construction of SAN Parks Management offices on the farm Hamilton 41, Mapungubwe National Park, Limpopo.

A section 24G report has been submitted in terms of the National Environmental Management Act, 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The constructed development includes the clearance of 4 550m<sup>2</sup> of indigenous vegetation to establish Park Management offices including services such as water pipeline, sewerage system and electrical infrastructure.

A previous SAHRIS application has reference (SAHRIS Case ID 10622 - <https://sahris.sahra.org.za/cases/hia-study-proposed-construction-visitor-orientation-infrastructure-and-conservation-facilities>).

Exigo Sustainability have been appointed to provide specialist heritage input into the 24G as per section 24(4)b(iii) of the NEMA and section 38(8) of National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Kruger, N. 2019. Archaeological Impact Assessment (AIA) for the proposed SAN Parks Mapungubwe Section 24G Project on a portion of the farm Hamilton 41MS, Mapungubwe National Park, Vhembe District Municipality, Limpopo Province.*

Stone Age lithics, Iron Age decorated and undecorated potsherds and a lower grinding stone was identified in the area surrounding the development footprint. No heritage resources were identified within the constructed development footprint. The site had been previously transformed by intensive historical agriculture and farming, and therefore the construction of the office complex is unlikely to have impacted on archaeological artefacts and/or sites.



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Recommendations provided in the report include:

- Considering the localised nature of heritage remains and the sensitivity of the surrounding heritage landscape, the general monitoring of further development progress by an ECO or by the heritage specialist is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended, and the archaeological specialist should be notified immediately;
- Should, at any stage, the development extend beyond the footprint denoted in this report, further detailed site inspections as part of additional Heritage Impact Assessment (HIA) processes for these areas should be conducted, subject to section 38 of the National Heritage Resources Act (NHRA -Act 25 of 1999);
- It is essential that cognisance be taken of the larger archaeological landscape of the area in order to avoid the destruction of previously undetected heritage sites. It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the project landscape along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period occur on farms in the area and these resources should be avoided during all phases of construction and development, including the operational phases of the development;
- As Palaeontological remains occur where bedrock has been exposed, all geological features should be regarded as sensitive;
- Water sources such as drainage lines, fountains and pans would often have attracted human activity in the past. As Stone Age material the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits.

In an Interim Comment issued on the 18/03/2019, SAHRA requested the following be completed as part of the 24G application:

- *“A Palaeontological Impact Assessment (PIA) inclusive of a field assessment for the proposed development;*
- *A Visual Impact Assessment (VIA) on the proposed development...;*
- *Proof of consultation with stakeholders such as affected local communities, the World Heritage Unit at DEA, land claimants and other identified Interested and Affected Parties (I & APs); and*

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- *A discussion of the existing Site Management Plans and Park Management Plan in the context of the proposed development.”*

Since the issuing of the Interim Comment, an HIA inclusive of a PIA and Viewshed Analysis has been submitted for review (21/05/2022).

*Gaigher, S. 2020. Heritage and Palaeontological Impact Assessment for the Park Management Office Complex Development.*

The report discussed the need for the office complex with regards to the Park Management Plan and the need for increased office space for the effective functioning of the park, as well as providing space for future heritage research and storage space for artefacts found in the Park. No archaeological deposits or artefacts were identified within the development footprint. Recommendations provided in the report include the need for a Chance Finds Procedure to be implemented and further groundworks will need to be monitored.

*Almond, J. E. 2020. Palaeontological Heritage Specialist Assessment: Combined Field-Based & Desktop Study. Proposed infrastructure in the Mapungubwe National Park near Messina, Vhembe District, Limpopo Province.*

The proposed development area is underlain by fossil-poor Clarens sandstones mantled with calcretised Late Caenozoic superficial deposits, while the development footprint has been highly disturbed. The impact significance of the development is very low, and no further studies are recommended. A Chance Fossil Finds Procedure is recommended to be implemented and is provided in the report.

*Du Plessis, C. 2019. Proposed Development of an Office Precinct within the Mapungubwe National Park, Limpopo Province.*

The viewshed analysis shows that the office complex will not be visible from the core heritage sites within the park and will be more visible to areas in the south-eastern section of the park (north-east from the development), with high visibility from the main road to the park and from the Interpretation Centre, however this road is not frequently travelled. The Visual Absorption Capacity of the study area is considered to be moderate, which will absorb the building to some degree.

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The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final 24G report and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- Monitoring reports of the recommended groundwork monitoring must be submitted to SAHRA upon completion of the construction phase;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final 24G and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the 24G Rectification Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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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/520992>

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.