

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 13473

Date: Monday March 18, 2019
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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: 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 550m² 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.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorite (APM) Unit understands that the office complex has been constructed and that the area has been impacted however, SAHRA draws attention to the comments provided on SAHRIS Case ID 10622. A comment issued on the 21/02/2017 requested the following studies to be completed:

- *“A Palaeontological Impact Assessment (PIA) inclusive of a field assessment for the proposed*

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

To remain consistent with previously issued comments, SAHRA requests that the above mentioned studies are compiled and submitted as part of a revised HIA and as part of the 24G application before further comments are issued.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

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Direct URL to case: <http://www.sahra.org.za/node/520992>