



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: 13564

Date: Wednesday March 20, 2019  
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## Interim Comment

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

Attention: Naledzi Environmental Consultants

Post net suite 320  
Private X9307  
Polokwane

### **Proposed Nandoni Mixed Development Project on the remaining extent of Farm Mphaphuli 278MT within Thulamela Local Municipality in the Vhembe District Limpopo Province**

Ront Trading (Pty) Ltd are proposing to construct a housing development including a private hospital named the Nandoni Estates near the Nandoni Dam and located within the Ha-Mutoti Village. The Village is located within the Thulamela Local Municipality of the Limpopo Province. The extent of the proposed development will be 80 ha, consisting of estate stands, private hospital that will be 10 ha in extent, and bulk services.

Naledzi Environmental Consultants cc (Pty) Ltd have been appointed by Ront Trading (Pty) Ltd to undertake the Environmental Impact Assessment (EIA) process in respect of listed activities in the Environmental Impact Assessment (EIA) Regulations 2014, as amended, that require an application for Environmental Authorisation in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA), as amended. As well as a water use licence in terms of the National Water Act (Act No.36 of 1998) (NWA) under Section 21(c) and (g) Water Uses. As well as a waste management licence in terms of National Environmental Management: Waste Act, Act 59 of 2008 (NEMWA).

To meet the requirements of section 38(8) of the National Heritage Resources Act, no 25 of 1999, a Heritage Impact Assessment (HIA) Report by Millenium Heritage Group (Pty) Ltd has been submitted to South African Heritage Resources Agency (SAHRA) for commenting.

*Mathoho, E. November 2018. Phase I Heritage Impact Assessment Relating to the Proposed Nandoni Estates and Private Hospital Project, Thulamela Local Municipality of the Vhembe District of the Limpopo Province, South Africa.*

The author undertook a field assessment of the proposed residential development area and identified six (6) heritage sites, all clusters of stone marked graves totalling 14 identifiable graves. There may be more graves



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in the surveyed area, but a portion of it has been previously disturbed by ground clearance to make way for parking. Graves are of high local significance, and they will be directly impacted by the proposed development. Due to the nature of the proposed development, the author assessed that they identified graves will be impacted by the development and recommends that the graves are exhumed and relocated to the nearest local cemetery. The author also recommends chance finds procedures if any potsherds, human remains, stone walling or stone tools are uncovered during construction.

### Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot accept the report as it is, because it does not contain relevant information in terms of the NHRA section 38(3)a,b,c,e. The HIA must be amended to include a map of the field survey tracks log, historical maps of the area if available, as well as a map of the identified sites, overlaid by the survey tracklog.

A .kml file must be uploaded to the palaeo-sensitivity map on the location info of the case, on SAHRIS. If the development area is underlain by palaeontological sensitive geological strata than an assessment may be required.

When the environmental documents become available during the EA application process, they must be uploaded to the case along with the Scoping Report/EIA report appendices. The HIA must be revised as part of the EIA process.

SAHRA will comment once the above requested information is uploaded to this case.

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

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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/521491>  
(, Ref: )