



an agency of the
Department of Arts and Culture

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CaseID: 13613

Date: Monday September 16, 2019
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Interim Comment

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

Attention: DALERWA VENTURES FOR WILDLIFE

Phase 1 AIA / HIA for a Tourism accommodation establishment, remaining extent of portion 4 of the farm Groenvlei 353JT, Emakhazeni (Belfast) Mpumalanga Province

Adansonia Heritage Consultants have submitted a Heritage Impact Assessment (HIA) report to South African Heritage Resources Agency (SAHRA) for commenting, in terms of section 38(8) of the National Heritage Resources Act, no 25 of 1999. They have submitted a HIA on behalf of their client, Dalerwa Ventures For Wildlife cc, who have been appointed by the Idwala Retreat Centre (Pty) Ltd, to conduct an environmental assessment for the establishment of a Lodge development on land that is 1 ha in extent. This proposed development is located on the remainder of Portion 4 of the farm Groenvlei 353 JT. In the eMakhazeni Local Municipality of the Mpumalanga Province.

Van Wyk-Rowe, C. February 2019. Phase 1 Archaeological/ Heritage Impact Assessment for a Tourism Accommodation Establishent on the Remaining Extent of Ptn 4 of the Farm Groenvlei 353-JT, Emakhazeni (Belfast).

The author undertook a field assessment of the proposed development area and identified 20 heritage features. A single possible grave, a cemetery containing 4 graves and a rock art site were identified outside the development footprint area. Both these types of sites are of high heritage significance and a located near potential hiking routes. Several stone walled enclosures dating to the historical period were also identified, they all of low significance. One of the stone walled cattle enclosures will be impacted by the lodge development with another 3 located close the proposed lodge.

The author recommends the following mitigation measures:

A Cultural Management Plan must be developed for the long term conservation of the Rock art site, graves and the stone walled enclosures outside the development footprint.

The development footprint must be amended to allow for conservation of the stone walled cattle enclosure.



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The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit issued an Interim Comment dated 18/04/2019, requesting the following:

As this is a section 38(8) application, all the environmental documents were supposed to be submitted along with the HIA report. Therefore, SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot provide comments on this HIA as the case is not complete.

The HIA also does not contain any information on the finalised plan for the proposed lodge, this information plus a map of the plans must be submitted to the case for comment. The HIA does not contain any photos of the identified heritage site and the report also does not contain a detailed impact assessment by the proposed development on sites within a 50 m radius with detailed mitigation measures.

The proposed development area is located within the orange zone on the SAHRIS palaeo-map, which indicates there is a high chance of fossiliferous rocks occurring within the development area. Therefore, SAHRA requires a field based Palaeontological Impact Assessment to be undertaken by a suitably qualified palaeontologist. The report must be submitted to the case for commenting.

SAHRA will comment on this development once all the environmental documents compiled for this development application are submitted to the case, along with the PIA report and amended HIA.

The EAP submitted a letter requesting an exemption from palaeontological studies as the portion where the lodge will be constructed is located within a palaeontologically insignificant zone.

Interim Comment

SAHRA APM Unit cannot assess the case and make a decision on the proposed development because the environmental documents have not been submitted to the case. Considering all the recommendations within the HIA, the position proposed for the lodge may be subject to change, in order to conserve identified heritage resources in situ. However, comments and recommendations cannot be endorsed until an amended HIA is submitted to the case, and an assessment of the palaeontological resources is undertaken and submitted to the case.

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The amended HIA, PIA and the environmental documents must be submitted to the case prior to the granting of the Environmental Authorisation. SAHRA awaits the submission of these reports.

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

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/521726>