



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: 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

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 13963

Date: Friday November 15, 2019

Page No: 1

## Final Comment

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

Attention: Emross Consulting (Pty) Ltd

#### **Proposed development of 13 new roads with a cumulative distance of 5.39km and the upgrade and broadening of two existing roads with a cumulative distance of 7.05km and the development of a rural abattoir on Sparta Farms 259KU, Mpumalanga**

Londolozi Nature Reserve (Pty) Ltd are proposing to upgrade 10.43 km of existing road, upgrade and broaden 2.94 km and 4.11 km of existing road. They also want to rehabilitate and close 11.96 km of existing roads and construct 5.49 km of new roads within the nature reserve. They also want to establish a 8.4 m<sup>2</sup> rural abattoir in the existing staff village. The proposed development is located on Portions 1, 2 and the remainder of the farm Marthly KU, and Portion 1 and the remainder of the farm Sparta 259 KU, in the Bushbuckridge Local Municipality of the Mpumalanga Province.

Emross (Pty) Ltd have submitted a draft Basic Assessment report (BAR) on behalf of the applicant, Londolozi Nature Reserve (Pty) Ltd, in support of an application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA) in respect of listed activities in the NEMA 2014 EIA Regulations, as amended.

In order to meet the requirements of SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, no. 25 of 1999 (NHRA), a Heritage Impact Assessment by African Conservation Trust (ACT) has been submitted to SAHRA for commenting.

*Radford van der Venter, A. June 2019. Heritage Impact Assessment Report for the Development of 13 New Roads with a Cumulative Distance of 5.39km, the upgrading and Broadening of two Existing roads with a Cumulative Distance of 7.05km and the development of a Rural Abattoir on Sparta farms 259 KU, Londolozi Game Reserve (Mpumalanga Province).*

The author undertook a field survey of the proposed development areas and did identified four heritage resources within the development area.

Site Lon-1 is a Middle Stone Aged Site located in a quarry, the site is of medium local significance and it will be impacted. Site Lon-2 is an open air Middle Stone Aged site of local low significance.



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: Nokukhanya Khumalo

Tel: 021 462 4502

Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)

CaseID: 13963

Date: Friday November 15, 2019

Page No: 2

Site Lon-3 is the original Selati Railway Line built by the NZASM, this site is of local high significance.

Site Lon-4 is the remains of 4 hunting rondavals of the Londolozi nature reserve, they were built in the 1920's, this site is of local high significance.

The author recommends that Site Lon-1 is conserved *in situ* and fenced for conservation or recorded by a qualified archaeologist with experience in stone aged archaeology. Furthermore, the author recommends that a Heritage Management Plan is developed for the whole reserve and the plan should contain chance finds procedures to be implemented in the event that more heritage resources are uncovered during construction.

## Final Comment

The developer has undertaken to retain site Lon-1 in situ therefore, the heritage specialist requested that the Final Comment is amended to exclude the request by South African Heritage Resources Agency (SAHRA) for site Lon-1 to be mitigated.

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA report submitted to the case for commenting and the recommendations provided therein and SAHRA accepts the amendment request for the conservation of site Lon-1 in situ and its inclusion into the CHMP for long term conservation. The site must be fenced using low wooden fencing posts to avoid impact from road grading and vehicles that may drive off the road.

SAHRA supports the recommendation for a Cultural HMP to be developed and implemented for the long term conservation of all the other the identified sites.

SAHRA has no objection to the development going ahead on the condition that the aforementioned recommendations are implemented, and the following additional conditions are included in the EMPr:

If any historical buildings will be impacted by the proposed development, then comment and permits in terms of section 34 must be sort from the Mpumalanga Heritage Resources Authority (MPHRA). Please contact Benjamin Moduka at [bmoduka@mpg.gov.za](mailto:bmoduka@mpg.gov.za) or call the offices at 013 766 5196.

In the unlikely event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the

Our Ref: 13963



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: Nokukhanya Khumalo

Tel: 021 462 4502

Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)

CaseID: 13963

Date: Friday November 15, 2019

Page No: 3

finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.

If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).

If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivase/Mimi Seetelo 072 802 1251).

This comment must be forwarded to the competent authority and proof of submission must be uploaded to the case. When the Record of Decision from the competent authority is issued for this EA application then, it must be submitted to the case.

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

Our Ref: 13963



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: Nokukhanya Khumalo  
Tel: 021 462 4502  
Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)  
CaseID: 13963

Date: Friday November 15, 2019  
Page No: 4

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

---

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/524614>

**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.