



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: 15195

Date: Wednesday August 26, 2020

Page No: 1

Interim Comment

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

Attention: Esther Howard
SANParks

Mapungubwe National Park & WHS HIA for Several Proposed Developments. - New staff quarters at the Rodesdrift House; - A new ablution facility at the existing Mazhou Camping Site; - Completion of the partly finished office complex at Hamilton; - Student dormitories at Hamilton; - An interpretive centre and visitors facility south of Mapungubwe Hill; - An interpretive centre and visitors facility east of the Schroda archaeological site.

G&A Heritage Proprieties (Pty) Ltd has submitted a Heritage Impact Assessment (HIA) report for the proposed developments in the Mapungubwe National Heritage Site (NHS) and World Heritage Site (WHS). SANParks, the management authority for the NHS/WHS is proposing to build the following infrastructure projects:

A new staff housing unit at the farm Rhodes Drift in the western section of the park. The housing plans have not been finalised, but they will look similar to the existing two-bedroom accommodation units.

An additional ablution block no more than 50m², located on Tuscanen MS. The block will consist of 4 female and 4 male toilets at the Mazhou camp.

Hamilton Youth Centre on the farm Hamilton 41 MS, the centre will not be more than 500m².

The Mapungubwe Interpretive Centre consisting of multiple buildings no more than 250m², located close to the sites Bambandanyalo, K2, and Mapungubwe Hill. These buildings will consist of Main Interpretive Centre, K8 Interpretive Centre, Boma/Picnic site, Schroda Orientation Centre.

The proposed development areas are underlain by sedimentary rocks of the Tuli Basin, which is a very highly sensitive palaeontological sensitive zone. As required by the SAHRIS PalaeoSensitivity map, a field assessment of palaeontological impacts should have been completed as part of the HIA. A Palaeontological Impact Assessment (PIA) report by a suitably qualified palaeontologist was not submitted to the case.

Gaigher, S. January 2020. The Mapungubwe National Heritage Site and World Heritage Site Heritage Impact Assessment for several proposed developments.



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

- **Rhodes Drift Staff Housing:** The park requires additional staff housing units to house the growing number of staff. The field survey did not identify any surface heritage resources, and random shallow trowel-test digs did not identify any shallow archaeological deposits. The author determines that there is a low likelihood of heritage resources being disturbed during construction.
- **Mazhou Camp Ablution Block:** There is a need for additional ablution facilities here, the impact will be minimal as it is within an existing facility.
- **Hamilton Youth Centre:** The centre is located close to the day visitors centre and the museum. This area is known to be heritage sensitive as an archaeological site was identified nearby. Some isolated surface potsherds and Middle Stone Age (MSA) stone tools were identified but were rated as low significance as they were out of context. However, due to there being other known sites close to this location, an archaeologist must monitor excavations during construction.
- **Office Block:** The block has already been constructed outside the park's core area; this development is subject to a separate NEMA 24G application. The author recommends a chance finds procedure for this proposed development, with monitoring by a heritage practitioner during construction phase.

The intention of building the Mapungubwe Interpretation Centres is to open up the Schroda site to the public, and also to increase visual stimulus, provide better knowledge transfer to tourist and education groups and provide better access to said groups. These centres will have the greatest impact on visual receptors and intact archaeological deposits due to its location. The structures are designed to limit the impact to the archaeological deposits as they will be off the ground, constructed on top of concrete pylons. Concrete pylons will be the most impact to the archaeological deposits.

- **Mapungubwe Orientation Centre Impacts:** 10m² of intact archaeological deposit will be removed for the pylons and additional impacts to the deposits due to the construction camps, and the septic tanks. There is also a danger of chemical contamination from sources such as diesel spillage and mobile latrine chemicals. The author recommends that the final placement of the interpretation centre should be on less sensitive archaeological deposit.
- **K8 Interpretation Centre Impacts:** The development of the interpretation centre here will help prevent



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: 15195

Date: Wednesday August 26, 2020

Page No: 3

further erosion of the exposed excavation wall and prevent potential injury to elephants. The author recommends a monitoring programme during construction, as intact archaeological deposits will be exposed. A management plan for long term conservation should be developed.

- **Boma/Picnic Spot:** This is a temporary shelter under an existing tree. This will be a refreshment stop for tourists going to and from the Mapungubwe Hill. The author recommends a monitoring programme during construction, as intact archaeological deposits will be exposed. A management plan for long term conservation should be developed.
- **Schroda Orientation Centre:** 10m² of intact archaeological deposit will be removed for the pylons and additional impacts to the deposits due to the construction camps, and the septic tanks. There is also a danger of chemical contamination from sources such as diesel spillage and mobile latrine chemicals. The author recommends that the final placement of the interpretation centre should be on less sensitive archaeological deposit.

Du Plessis, C. November 2019. Proposed Development of an office Precinct Within the Mapungubwe National Park, Limpopo Province.

The author submitted a brief summary of a visual impact assessment of the proposed Mapungubwe Office Complex. Some maps of the visual impacts the Mapungubwe, K8 and Schroda were submitted to the case however, these do not constitute an impact assessment on their own. It is also not clear whether an assessment of visual impacts on top of the hill were conducted.

The HIA report states that the Visual Impact Assessment (VIA) and PIA will be carried out once the HIA is accepted by SAHRA. This is concerning since the impacts and proposed mitigation from the VIA and the PIA were supposed to be considered in the HIA for the overall assessment of impacts to heritage.

Interim Comment

The comments provided in SAHRIS Case ID 10622 (<https://sahris.sahra.org.za/cases/hia-study-proposed-construction-visito...>) and 13473 (<https://sahris.sahra.org.za/cases/s24g-sanparks-management-offices-mapun...>) have reference.

SAHRA requested the following information to be provided as part of the HIA for both previous cases:

Our Ref: 15195



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: 15195

Date: Wednesday August 26, 2020

Page No: 4

- A Palaeontological Impact Assessment (PIA) inclusive of a field assessment must be conducted for the proposed development;
- A Visual Impact Assessment (VIA) must be conducted on the proposed development, inclusive of photo montages showing the viewshed of the proposed developments within the park;
- Motivation by means of a tourism study for the proposed dormitories, camping areas and visitor orientation centres must be supplied and discussed in the context of the HIA;
- Proof of consultation with stakeholders such as affected communities, the World Heritage Unit at DEA, land claimants and other identified Interested and Affected Parties (I & APs).

This information has not been provided as part of the HIA and therefore SAHRA cannot provide any further comments at this stage.

SAHRA requests clarity on the applications that are being undertaken. In a meeting held with SAN Parks on the 14 February 2018, it was decided that three separate applications be submitted to SAHRA to ensure that each proposed development may be processed correctly. This was then communicated to and discussed with SAN Parks in a Vele EMC HBsC meeting held on the 27 February 2018 and 28 August 2018.

A Section 24G Rectification application for the Office Complex is currently on record with SAHRA as SAHRIS Case ID 13473. The case is awaiting further information in order for comments to be issued. Should this case no longer be relevant, a letter stating this must be submitted to the case in order for the application to be closed. If this applicant is still open, SAHRA awaits the requested information as provided in the Interim Comment issued on the 18/03/2019 including the S24G documents in order for an informed comment to be provided.

The dormitories are part of a NHRA section 38(8) application as part of an Environmental Authorisation Application for the dormitories. This application must include all of the EIA documents in order to make an informed decision, along with the requested information in comments provided on SAHRIS case ID 10622.

The staff housing, ablution block and orientation centres would require permit applications in terms of section 27(18) of the NHRA. In terms of section 38(7), SAHRA may request that an HIA be conducted as part of the permit application to inform the decision-making process.

Each of these applications require specific HIAs to be conducted that can be used for decision and commenting procedures in terms of NEMA and the NHRA.

SAHRA awaits clarity as requested above before further comments are issued.

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

Our Ref: 15195



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: 15195

Date: Wednesday August 26, 2020
Page No: 5

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/537713>
(, Ref:)