



an agency of the  
Department of Arts and Culture

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CaseID: 15195

Date: Wednesday August 25, 2021

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## Final Decision

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

Attention: Ms 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.**

The SAHRA issued an interim Comment dated 26/08/2020 requesting the following:

*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:*

- 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*



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*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 application 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.*

A VIA and an updated HIA inclusive of a PIA have been submitted to the case (20/07/2021), however, all these documents do not assist in clarifying the legal application process being followed for the proposed developments.

## **Final Decision**

SAHRA cannot make an informed decision on any of the proposed activities with the information provided to the case 15192 as discussed in 2018, 2020 and 2021. To avoid any further delays to the projects SANParks

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wishes to embark on, SAHRA requires the adherence of the following:

A PIA report, a brief assessment of the visibility of the staff offices, and repository to the main gate and museum must be uploaded to case 13473 in order to comply with the Interim Comment issued on that case, so the application may be concluded.

A new case must be created on SAHRIS for the proposed activities at Mazhou Camp. If they will not form part of an application to DEFFE then the application on SAHRIS will be a permit application. The HIA, PIA, and VIA can be uploaded to the case along with an addendum to the HIA that summarises the impacts in the VIA, HIA and PIA specific to application for the Mazhou Camp development.

A new section 38(8) case must be created for the proposed dormitories and staff accommodation facilities. The HIA, PIA, and VIA can be uploaded to the case along with an addendum to the HIA that summarises the impacts in the VIA, HIA and PIA specific to this development application. This SAHRIS case must be accompanied by the EIA documents to be submitted as part of the BAR process.

Due to the complex nature of the proposed activities at Schroda and Mapungubwe Valley (orientation centers), a separate standalone case must be created. The HIA, PIA and VIA can be uploaded to the case along with an addendum to the HIA that summarises the impacts in the VIA, HIA and PIA specific to this proposed development. This SAHRIS case must be accompanied by the EIA documents to be submitted as part of the BAR process. This application will look at the development footprint area and a subsequent section 27(18) permit application will be created for the approval of the building designs.

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

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**ADMIN:**  
Direct URL to case: <https://sahris.sahra.org.za/node/537713>