Our Ref: 15346



an agency of the Department of Arts and Culture

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Enquiries: Nokukhanya Khumalo Tel: 021 462 4502 Email: nkhumalo@sahra.org.za CaseID: 15346 Date: Wednesday October 19, 2022 Page No: 1

Interim Comment

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

Attention: AGES (PTY) Ltd - Limpopo

PO Box 2526 Polokwane 0700

Proposed new croplands on 450ha and S24G rectification of 59ha of existing croplands on portion 3 of the farm Coniston 699 MS, in the Waterpoort area, Vhembe District, Limpopo Province. The proposed croplands are to be used as tomato croplands.

Koespan Broedery (Pty) Ltd are proposing to clear 450 hectares of natural vegetation located on Portion 3 of the Farm Coniston 699 MS in the Waterpoort Area, Makhado Local Municipality of Limpopo Province. They have already commenced in the clearing of 59 ha of natural vegetation in which they will be applying for section 24G rectification.

A Final Scoping Report and a Section 24 G Rectification Report by AGES Geo and Environmental Services (Pty) Ltd has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA EIA Regulations.

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 (HIA) by Shasa Heritage Consultants cc and a Palaeontological Desktop Study (PDS) by Dr B Rubidge have been submitted to SAHRA for commenting.

Stegmann, L., and Roodt, F.E. August 2020. Development of New Croplands and S24G Rectification of Existing Croplands Portion 3 of The Farm Coniston 699 MS in the Waterpoort Area, Makhado Local Municipality, Vhembe District Limpopo Province.

The author undertook a field assessment of the proposed tomato croplands and identified 18 heritage features that were found along drainage line and two sites within the proposed cropping area. The two heritage sites in the cropping area are an old historical homestead and cemetery belonging to the Tshivaulu family (Sites 8 and 9). These areas have been demarcated out of the proposed clearing an cropping area and will be conserved *in*

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situ. The sites in the drainage area are within the wetland buffer zone and will not be impacted. The author recommends monitoring during ground clearance.

Rubidge, B. August 2020. Establishment of tomato croplands on farm Coniston, Waterpoort area, Vhembe District, Limpopo Province.

The entire study area is underlain by Carboniferous-Jurassic rocks of the Tshidzi, Madzaringwe, Mikambeni, Fripp, Solitude, Klopperfontein, Bosbokpoort and Clarens formations of the Karoo Supergroup. Theses formations have a high to very high palaeontological significance; however, fossils have not been identified in this area. They are overlain by thick alluvial sands with no exposed rock outcrops. The proposed tomato croplands will not impact on any significant bedrock. Therefore, the author recommends that the development goes ahead on the condition that if any rock outcrops are exposed then a palaeontologist must be called on site to inspect the outcrops.

The SAHRA issued an Interim Comment dated 10/09/2022 and stated that further comments will be issued once the draft EIA report is submitted to the case. The section 24G side of the application has received the EA (12/1/9/S24G-V45). However, the EA application for further natural vegetation clearance was paused for further heritage consultation. An updated HIA report, and a graves management plan was submitted along with a Consultation Scoping Report.

Stegmann, L. and Roodt, F. August 2022. Grave Management Plan for in situ graves on portion 3 of the farm Coniston 699 MS, Waterpoort, Limpopo Province.

There are 2 cemeteries (Sites 11 and 22.08) and 13 graves (Sites 8-10, Sites 22.1-22.7, Site 22.9, and Site 22.14) were identified along with eleven family (social) areas (residential areas pointed out by families) were recorded in 2022. These social areas (Sites 1-7 and 22.10 to 22.13) have little demarcating them as residential areas, and most of the graves have shrubbery as markers. The author states that all identified residential areas will be excluded from the proposed farm areas and the graves located outside the exclusion area will fence with a 30m buffer zone to protect the graves from encroachment. The exclusion area must be communicated to the farm workers, and ground clearance activities must be monitored for any sites that may be uncovered.

Interim Comment

South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit

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cannot provide comments because the updated Heritage Impact Assessment report was not submitted to the case for commenting. In addition, the Graves Management Plan must be amended to include the following: A map of the identified sites located outside the exclusion area,

The exclusion area must be mapped on the same map as the sites and the proposed croplands area, A preliminary protocol with registry for the family to gain access to their family graves.

The SAHRA will provide comments on this application once the draft EIA report and its appendices and the aforementioned amendments and reports are submitted to the case for comments.

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: https://sahris.sahra.org.za/node/538648 (LEDET, Ref:)

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