



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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CaseID: 15588

Date: Tuesday January 26, 2021

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## Final Comment

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

Attention: VODACOM (PTY) LTD

VODACOM SITE /NO: 6 KWAMBUZI NONGOMA 3880

**Project Description: Vodacom intends to construct a 30m Lattice type mast with antennae mounted onto the mast, and container housing associated equipment. The size of the base station (fenced area) in which the mast and associated equipment will be placed will measure 8m x 8m (64m<sup>2</sup>). Location: The site is located at Nandoni Dam (on the premises of the Royal Gardens Leisure Park) near Mutoti village, on the Remainder of the Farm Mpapuli 278 MT, within the Thulamela Municipality area. (Co-ordinates: S 22°58'21.20" E 30°35'03.67")**

Tekplan Environmental has been appointed by Vodacom (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed telecommunications mast near the Nandoni Dam, on Remainder of the farm Mphapuli 278 MT in the Thulamela Local Municipality, Limpopo Province. The base station will be 64m<sup>2</sup>, on a cleared portion of land adjacent to a gravel road intersection.

A draft Basic Assessment Report (BAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA). The proposed development will include the construction of a 25 m lattice mast and container housing equipment in an area that will measure 8 m x 10 m.

The Draft Consultation BAR has not included an assessment of heritage resources as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) that complies with section 38(3) of the NHRA. The proposed project footprint is located in an area of moderate palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map.

The SAHRA APM unit issued an interim comment dated 22/11/2019 requesting the heritage studies to be undertaken inclusive of an Archaeological Impact Assessment of the development area and a Palaeontological Impact Assessment. The heritage studies have been submitted to the case on SAHRIS.

HCAC - Heritage Consultants and Marion Bamford were requested to provide heritage specialist input as part of the EA process as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999



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(NHRA) as required by section 24(4)b(iii) of NEMA.

*Van der Walt, J. December 2020. Heritage Impact Assessment for Vodacom Mast Nandoni Dam, Limpopo Province.*

The author undertook a field assessment of the proposed development area and did not identify any heritage resources. The author recommends standard chance finds procedures to be followed once construction of the base station begins.

### **Final Comment**

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA and the PIA reports submitted to the case for commenting, and has no objection to the development going ahead on the following conditions.

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 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).

The Final BAR and its appendices must be submitted to the case and once a Record of Decision from the

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competent authority is issued, it must also 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

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/541437>  
(LDEDET, Ref: )

**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.