



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: 16333

Date: Thursday June 03, 2021

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## Interim Comment

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

Attention: Mr Ngonidzashe Chimusoro

Mpumalanga Department of Public Works, Roads and Transport

**The Department of Public Works, Roads and Transport (DPWRT), the Applicant, commenced with the upgrading, along with associated activities, of the rural access road D4407 between Hluvukani and Timbavati (7.82km) and road D4416 between Timbavati and road p194/1 near Welverdiend (3.37km) in the Bohlabela region of the Mpumalanga Province.**

Department of Public Works has appointed NCC Environmental Services (Pty) Ltd to undertake a Section 24G application, a Basic Assessment application process and a EMPr in support for an Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended, for activities that trigger the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended.

The Department of Public Works has commenced with the upgrading of several public roads and wishes to continue road upgrades amounting to 15.89 km in length, in the Bohlabela region of the Bushbuckridge Local Municipality of Mpumalanga Province. Construction will also include 2 burrow pits for the material to use on the road.

A Heritage Impact Assessment (HIA) report by PGS Heritage (Pty) Ltd has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

*De Bruyn, C. February 2021. Upgrade Of Road D4407 Between Hluvukani And Timbavati, Road D4409 At Welverdiend And Road D4416/2 Between Welverdiend And Road P194/1 In The Bohlabela Region Of The Mpumalanga Province.*

The author undertook a field assessment of the proposed road upgrades and identified 21 heritage resources/sites consisting of local churches, burial grounds, historical buildings and ruins. Sites HR-03 to HR-05 are historical houses of low heritage significance. HR-06 and HR-07 combined are the remains of farmstead infrastructure of very low heritage significance. Sites HR-08 to HR-21 are burial grounds and graves. The author recommends the following:

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Sites HR-08, HR-09 and HR-15 are unknown graves that were partially impacted by the road construction that forms part of the 24G application. The authors recommend fencing of the site to prevent further damage and for social consultation process to be undertaken so the grave can be relocated.

Site HR-16 is an unknown infant grave located within 10m of the proposed construction activities. The author recommends that the entire area that the location of the grave may be must be fenced off and considered a No-go area.

The remaining graves (HR-10 to 14 and HR-16 to 21) are located from 40m to 100m depending on the cemetery and the authors recommend a 30m no-go area around them.

The existing fences around the historical buildings are sufficient to protect against damage and provides no further mitigation measures.

## Interim Comment

It is noted that the Heritage Practitioner was appointed by an EAP to undertake impact assessment as part of an Environmental Authorisation (EA) application. The SAHRA as a commenting authority in a NEMA EA application process requires all environmental documents, compiled in support of an EA as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA.

The SAHRA will provide further comments on this project upon submission of the environmental documents associated with this application to the case on SAHRIS. A .kml file of the proposed road upgrades must be submitted to the palaeosensitivity map section of the case. The palaeontological sensitivity of the zone underlying the road upgrades and if Palaeontological Impact Assessment is required by the SAHRIS palaeomap policy then a PIA report by a suitably qualified palaeontologist.

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/569504>