



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: 16528

Date: Monday July 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: Liesl Stegmann

Shasa Heritage Consultants CC

#### **HERITAGE SCOPING REPORT FOR PROPOSED BENDOR X129 TOWNSHIP ESTABLISHMENT ON PORTION 191 OF THE FARM TWEEFONTEIN 915 LS, POLOKWANE, CAPRICORN DISTRICT, LIMPOPO PROVINCE**

AGES Limpopo (Pty) Ltd was appointed to undertake a Basic Assessment application process 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.

Township establishment for higher education purposes with associated uses and amenities. The township will consist of 3 erven for student accommodation providing 4 700 beds, 2 erven for place of instruction (vocational facilities), 1 erf for access and access control and engineering services, 1 erf for private open space. There will be limited retail for the campuses, canteens, post & copy shop and bookstore. Services will be provided by Polokwane Municipality. The development is located on Portion 191 of the farm Tweefontein 915 LS in Polokwane Local Municipality of Limpopo Province.

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

*Stegmann, L. and Roodt, F.E. June 2020.* Proposed Bendor X129 Township Establishment on Portion 191 of The Farm Tweefontein 915 LS, Polokwane, Capricorn District, Limpopo Province.

The author undertook a field assessment of the proposed development area and identified a stone walled settlement in the north east section of the proposed development. This site maybe a cattle enclosure supporting the theory that it was a Later Iron Aged cattle outpost, may be associated with Ndebele type 2 settlements that are located close to the site. The site is degraded but the stonewalling is clearly visible. The author assessed the settlement to be of medium significance and recommends that this section is excluded from the development and a heritage management plan is created for the long term conservation of the site. The area is also ecologically sensitive and the ecologist recommended the area to be excluded from the



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development.

The area underlain by magmatite and gneiss rocks of the Hout River Gneiss and Turfloop Granite and the area has a low palaeontological sensitivity.

### Final Comment

The SAHRA Archaeology, Palaeontology, and Meteorites (APM) Unit notes and accepts the submission of the draft BAR and HIA report, and accepts the recommendations provided by the Heritage Specialist. Furthermore, we grant the development from undertaking an assessment of impacts to palaeontological resources. SAHRA has no objections to the proposed development on the following conditions:

A Chance Finds Fossil Procedures must be developed by a palaeontologist and it must be included in the EMPr.

In the 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 012 320 8490).

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.

This Final Comment must be forwarded to the competent authority and proof of submission must be uploaded to this 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/574579>

(LEDET, Ref: )

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.

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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.