



an agency of the
Department of Arts and Culture

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CaseID: 16669

Date: Wednesday September 15, 2021

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Final Comment

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

Attention: SANRAL

Private Bag X 17
Lynnwood Ridge
0040

The Proposed Upgrade of SANRAL National Road R101 Section 8 From Bela Bela (km 0.0) to Modimolle (km 26.8), Waterberg District Municipality, Limpopo Province

SANRAL (SOC) Ltd have appointed GA Environmental (Pty) Ltd 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.

SANRAL is proposing to upgrade section 8 of the R101 road for 26.8 km between Bela Bela to Modimolle, crossing various farms in the Bela Bela and Modimolle Local Municipality of Limpopo Province.

A Heritage Impact Assessment (HIA) by Heritage Contracts and Archaeological Consultants (HCAC) and Palaeontological Impact Assessment (PIA) report by Prof M. Bamford has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

Van der Walt, J. May 2021. Heritage Impact Assessment for the Proposed Upgrade of SANRAL National Road R101 Section 8 from Bela Bela (km 0.0) to Modimolle (km 26.8) & Palaeontological Impact Assessment for the Proposed Upgrade of SANRAL National Road R101 Section 8 from Bela Bela (km 0.0) to Modimolle (km 26.8).

The author undertook a field assessment of the proposed road upgrades and did not identify any heritage resources within close proximity to the upgrades that will be impacted by construction activities. The road was last upgraded in 1965, making it younger than 60 years and the two bridges along the upgrades are also younger than 60 years. A Later Iron Aged site was found close to road realignment area 3, and some house foundations. There were other historical structures identified along the road and a cemetery, however, there will be no impact to all identified heritage sites.

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The author recommends chance finds procedures for any heritage resources that may be uncovered during construction.

Bamford, M. May 2021. Palaeontological Impact Assessment for the proposed R101 Upgrade between Bela-Bela and Modimolle, Limpopo Province Desktop Study (Phase 1).

The road section is underlain by rocks of the Alma and Swaershoek Formations (Nylstroom Subgroup, Waterberg Group, Transvaal Supergroup) in the northern and central sections from Modimolle. They are of moderate palaeontological significance, however together with known fossilised microbial mats identified in these formations. Then the road in the south close to Bela Bela passes through the Clarens Formation, Stormberg Group, Karoo Supergroup, which is of High Significance. The author recommends the implementation of the Fossil Chance Finds Procedure that is contained in the report in section 8.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the HIA and PIA reports and the recommendations contained in them. The SAHRA has no objection to the development going ahead on the following conditions:

All sites identified in the HIA must be demarcated in a map so the roadworks crew is aware of them.

The ECO must monitor all construction activities around the memorial site.

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Officer (EO) in charge of these developments must be informed. These discoveries ought to be protected and the ECO must report to SAHRA.

A Chance Finds Fossil Procedures included under section 8 of the PIA report must be included in the EMP.

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 heritage resources discovered during construction and operation phases of the

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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 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

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/576367>
(DEA, Ref: 14/12/16/3/3/1/2354)

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.