

## Interim Comment

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

Attention: Royal Haskoning DHV  
Fountain Square  
78 Kalkoen Street  
Monument Park Ext. 2

Pretoria  
**Environmental impact assessment (EIA) for the construction of a proposed new route P166-1/2 at Mbombela, Mpumalanga Province**

Thank you for informing SAHRA of the proposed development of P166 1/2 road, that will run parallel to the R40 road to White River in Mbombela, Mpumalanga Province. The proposed P166 road development including the Phumlani 1;2 and 3 alternative routes listed in the Environmental Scoping Report will cover approximately 32km. It is noted that there was a request for additional information on the heritage resources found near the development area in the interim comment made on 07/08/2014.

Van Schalkwyk, J. July 2014. *HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED P166-1/2 ROAD DEVELOPMENT MBOMBELA, MPUMALANGA PROVINCE.*

This heritage report is the updated heritage report submitted to Case\_ID 1696, in reply to the comment made 07/08/2014 asking for clarification of the heritage resources mapped on fig. 9 page twelve of the July heritage report. It is noted that the revised version of the report carries the same date as the previous one, which is confusing for the reader.

SAHRA requested more details on the heritage sites identified including a description of the heritage resource, the significance of each site, its GPS co-ordinates and the approximate distance of the heritage resource from the proposed road development.

The description was limited to classification, which is not a description, moreover, no image of the sites was provided nor there was a relationship between the sites listed in Table 2 and those displayed in Fig. 9. It should be noted that the map showing the location of the heritage resources should be marked with the site numbers that correspond with the site numbers on the table with the list of the sites. This is to clarify the site location with the development. Also missing in this heritage report is the relative or absolute age of the heritage resources, different resources of different age are protected under different sections of the NHRA for which different heritage authorities are responsible.

SAHRA APM unit requires that a clear description of sites 9, 26, 29 and 30 is provided in a revised report with an amended date:

- in the case of the burial site (9) the description should include how many burials are included in the cemetery, what is the estimated age of the burial site, whether it is still in use and whether there is a fence around it.
- In the case of the Early Iron Age site (26): what is the structure of the settlement, if this is a settlement, how extensive the site is, what its preservation is, whether there is any cultural material that can be identified on the surface. Since it is located only 130m from the main alignment, SAHRA needs to be certain that the extent of the site has been identified enough to ensure that no damage to the archaeology occurs during construction.
- In the case of the farm labourers homesteads (29 and 30), we need to understand whether they are part of the same complex, to when they date, what their preservation is and whether they are still inhabited.
- Images of all sites must accompany the descriptions. Please note that this information should normally be included in any description of a heritage site recorded in a heritage impact assessment.

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The heritage resources that are located less than 200m away from the construction of the P166 and the Phumulani alternatives will be in danger of destruction during the construction of the road, thus the very limited description of the heritage resources provided in the amended heritage report is still not enough and it does not follow the SAHRA minimum standards of a heritage report.

Before SAHRA can provide a final comment on this development, it requires further information on the heritage resources mentioned above, this includes:

- photographs of the heritage resources listed on the map fig. 9.
- an amendment of the map to indicate which heritage resources on the table, occur where on the map, thus creating a link between the map and the table.
- the significance of the heritage resources including the relative or absolute age of the heritage resources.

SAHRA awaits the required information before a final comment can be published 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



Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/111147>  
(DEA, Ref: DEA 14/12/16/3/3/2/384)

**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.

