



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: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 18784

Date: Tuesday September 06, 2022  
Page No: 1

## Final Comment

### In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Chris Douglas Goodman  
Londolozi Game Reserve (Pty) Ltd.  
Londolozi Sabi Sand Wildtuin  
P.O. Box 6, Skukuza, 1350

**Founder's is one of the oldest of the camps at Londolozi and needs maintenance and refurbishment in order to maintain the high standard offered by Londolozi to their guests. Rooms 4 to 10 of Founder's Camp are planned for refurbishment which will include some degree of expansion, totaling approximately 180 square meters. Due to the camp being located on the banks of the Sand River and within the 32m setback, application for environmental authorisation is required, and this includes review of the EIA report and comment from SAHRA.**

Zunckel Ecological and Environmental Services have been appointed by Londolozi Game Reserve (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed refurbishment and expansion of the existing rooms of the Founder's Camp on Sparta Farms 259KU, in the Londolozi Game Reserve, Kruger National Park, Mpumalanga Province.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the refurbishment and expansion of seven existing rooms, and main area which includes the dining and lounge.

No assessment of heritage resources that complies with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA has been submitted as part of the EA application.

In an Interim Comment issued on the 01/07/2022, SAHRA requested that an assessment of the impact to heritage resources be conducted as part of the EA process that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA. Since the issuing of the Interim Comment, a Letter of Exemption has been submitted.

*Van Deventer-Radford, A. 2022. Letter of Exemption of Heritage Impact Assessment for the Proposed*



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 18784

Date: Tuesday September 06, 2022  
Page No: 2

### *Refurbishment and Expansion of the Existing Rooms of the Founder's Camp on Sparta Farms 259- SAHRIS Case ID – 18784.*

Four original rondawels built in 1926 are located within the proposed project area, rated as sites of medium heritage significance. The heritage specialist has noted that the activity of refurbishment of the existing rooms and main area which included the dining area and lounge, will not impact any heritage resources located in the immediate area. A Chance Finds Procedure is recommended to be followed. It is noted that the Sabi Sands Wildtuin (SSW) is in the process of developing a Cultural Heritage Management Plan for the whole reserve that will guide the management of known heritage sites.

### **Final Comment**

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/ Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- If heritage resources are uncovered during the course of the development, a professional archaeologist

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 18784

Date: Tuesday September 06, 2022  
Page No: 3

or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

---

Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

---

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

**ADMIN:**

Direct URL to case: <https://sahrissahra.org.za/node/598927>  
(DARDLEA, Ref: )

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 18784

Date: Tuesday September 06, 2022

Page No: 4

### 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.