

**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: Elijah Dumisani Katsetse

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CaseID: 16655

Date: Monday July 19, 2021

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## **Final Comment**

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

Attention: Tekplan Environmental

PO Box 55714  
Polokwane  
0070

### **Olifantsnek Vodacom Mast, North West Province**

TEKPLAN Environmental has been appointed by Vodacom (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed construction of a 55m lattice mast in the Olifantsnek area within the Magaliesberg Biosfeer on Portion 77 of the Farm Commissiesdrit 327 JQ, Rustenburg Local Municipality, Bojanala Platinum District Municipality, North West Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The scope of work includes a 55m lattice mast with antennae mounted onto the mast and container housing associated infrastructure. The size of the base station (fenced area) in which the mast and associated infrastructure will be placed will measure 12m x 12m (144m<sup>2</sup>).

TEKPLAN, and Heritage Contracts and Archaeological Consulting, and Prof. Marion Bamford have been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*van der Walt. J. May 2021. Heritage Impact Assessment for the Olifantsnek Vodacom Mast in the North West Province.*

A visual and physical inspection of the proposed site recorded no structures older than 60 years or archaeological finds of significance. No significant heritage resources will be affected by the development and therefore the impact of the project on heritage resources are low and the project can commence based on the implementation of the recommendation in this report and the approval of SAHRA. A chance Find Procedure is recommended.



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It is noted in the HIA archaeological component that the project footprint is an area of high palaeontological sensitivity and an independent study was conducted by M. Bamford (2021) and the study recommended that a Chance Find Protocol should form part of the EMPr for the project. However, the palaeontological report has not been submitted to the application.

In an Interim Comment issued on 19/07/21, the SAHRA Archaeology, Palaeontology, Meteorite Unit acknowledged receipt of the dBAR and HIA archaeological component along with the recommendations provided therein. SAHRA also noted that the proposed Mast is located in an area of high palaeontological sensitivity, and requested a desktop assessment of the impact to palaeontological resources must be undertaken, and stated that a field-based assessment may be required depending on the outcomes. SAHRA further stated that the assessment must be conducted by a qualified palaeontologist. Since the issuing of the Interim Comment a PIA report cited in the HIA Archaeological Component has been submitted to the application for SAHRA to review and comment on.

*Bamford, M. May 2021. Palaeontological Impact Assessment for the Proposed Construction of the Olifantsnek Vodacom Mast on Farm Commissiesdrift 327 JQ, Rustenburg Local Municipality, North West Province.*

The proposed site for the Olifantsnek Vodacom Mast on the Farm Commissiedrift lies on the Shales and Sandstones of the Silverton Formation (Pretoria Group, Transvaal Group). Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the Silverton Formation or the nearby soils of the Quaternary. There is a very small chance that stromatolite fossils may occur in the Silverton Formation. Therefore, A Chance Finds Protocol should be added to the EMPr. Based on the above no palaeontological site visit is required unless fossils are found.

## 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 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,

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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 (Elijah D. Katsetse/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/Mimi Seetelo 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(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) If heritage resources are uncovered during the course of the development, a professional archaeologist 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 SAHRIS case for record purposes,
  - The decision regarding the EA must be communicated to SAHRA and uploaded to the 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

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Elijah Dumisani Katsetse  
Heritage Officer  
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/576300>

**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.