

Our Ref:



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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Enquiries: Sityhilelo Ngcatsha

Date: Wednesday February 17, 2021

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Email: sngcatsha@sahra.org.za

CaseID: 15809

Interim Comment

In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Nala Local Municipality

Development of a township establishment, which includes formalization of the existing informal settlement located on Portion of the Farm Oranjevlei 174, Wesselsbron within the jurisdiction of Nala Local Municipality.

NSVT Consultants has been appointed by Vexocom (Pty) Ltd to undertake the Environmental Authorisation application for the rectification and continuation process which includes the formalisation of the Khalinkomo Informal Settlement located on Portion of the Farm Oranjevlei 174, Wesselsbron within the jurisdiction of Nala Local Municipality, Free State Province.

A draft Environmental Impact Assessment (EIA) report was submitted in terms of the section 24G (1) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (as amended) ("NEMA"). The clearance of approximately 20.5 hectares of indigenous vegetation and construction of latrines and internal roads along with temporary communal water standpipes was done before an EA was obtained.

The total development footprint for the proposed Khalinkomo township establishment is 102.59 hectares and 1476 residential units will be constructed. The proposed development includes grading of internal roads along with excavations for laying of sewer and water pipelines.

Pelser, A.J. 2020. Phase 1 HIA Report For The Proposed Khalinkomo Township Development Located On A Portion Of Oranjevlei 174 In Wesselsbron/Monyakeng, Free State Province

As indicated earlier no sites, features or material of cultural heritage (archaeological and/or historical) origin or significance were identified in the study area during the physical 16 assessment. If any did exist here in the past it would have been largely disturbed or destroyed by earlier farming activities and recent informal and more formal residential settlement. It is recommended that the development be allowed to continue.

The SAHRA APM unit issued an interim comment dated 19/01/2021 which requested that a desktop PIA be undertaken and submitted to the case. The comment also requested that the submitted HIA be amended to include the tracklog of the field survey of the study area. The HIA was subsequently amended and submitted

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to the case along with the requested PIA on the 08/02/2021.

Butler, E. 2021. Palaeontological Desktop Assessment for the proposed Khalinkomo Township Development Located on a Portion Oranjevlei 174 in Wesselsbron/Monyakeng, in the Free State

The study area is underlain by the Volksrust Formation (Ecca Group, Karoo Supergroup) as well as Quaternary aeolian sand.

Quaternary deposits fossil assemblages include bivalves, diatoms, gastropod shells, ostracods along with bones, horn cores as well as mammalian teeth. Tortoise remains have also been uncovered as well as amphibian and crocodile remains. Fossil assemblages of the Volksrust Formation include rare temnospondyl amphibian remains, invertebrates, petrified wood, and low-diversity marine to non-marine trace fossil assemblages along with minor coals with plant remains and bivalve *Megadesmus*.

It is recommended that the proposed development will not lead to detrimental impacts on the palaeontological reserves of the area and development may be authorised. A Chance Find Protocol is attached to the report.

Interim Comment

The SAHRA APM unit notes the heritage specialist report and the recommendation provided therein. SAHRA rejects the PIA on the basis of it being contradictory and lacking logical conclusions;

The PIA states that "According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Volksrust Formation is High while that of the Quaternary aeolian sand is Moderate. However, Groenewald et al (2014) allocated a Moderate Palaeontological Sensitivity to the Volksrust Formation in the Palaeotechnical Report of the Free State. It is therefore considered that the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological reserves of the area."

Please elaborate on the conclusion, i.e. why it is assumed that none of the fossils listed for the formations will be impacted. There may still be an impact even though it is "only" deemed to be of moderate sensitivity. It must be assessed in a meaningful way and explanations provided why it is assumed that there is no impact, e.g. prior disturbance, thick Quaternary cover, proximity to volcanic activity, no deep excavations, sparse distribution of fossil finds in a specific formation (but more significant then?).

"The construction of the development may be authorised in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources."

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In the previous paragraphs it is stated that the area is of high/moderate sensitivity but this sentence states it is not considered sensitive. SAHRA requires a step by step explanation how the author came to this conclusion as in its current form it appears contradictory.

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

Yours faithfully

Sityhilelo Ngcatsha
Archaeology, Palaeontology, Meteorite Intern
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/546285>
(DESTE, Ref: 24G/15/19/02)

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.

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3. SAHRA reserves the right to request additional information as required.