



Interim Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the KwaZulu-Natal Heritage Act (Act 4 of 2008)

Attention: SPM Environmental Consulting
20 B Tecoma Street
Berea
East London
5241

Proposed Road Upgrade Between Pongola and Mpumalanga Border, KZN

Thank you for the opportunity to comment on this development. The Heritage Impact Assessment that was submitted in support of this development proposal has been reviewed. While the development is along a route that is largely disturbed and does not appear to have any notable heritage resources under threat, Gavin Anderson notes that one borrow pit had four households within the proposed borrow pit and that there are some graves in close proximity to another borrow pit. Amafa concurs with the heritage practitioner regarding the need for further assessment around the borrow pit as it could be associated with human graves. The assessment should cover all borrow pit extensions as the previously granted authorizations would have been for the footprint of a specific dimension as per the previous applications. This will eliminate the possibility of inadvertent damaging or destruction of unmarked/informal graves and challenges of dealing with possible work stoppage emanating from aggrieved communities.

A Phase 2 Heritage Impact Assessment to determine the sensitivity of the cultural landscape and associated features is therefore required.

The Phase 2 assessment should cover the history of occupation of that site through a social consultation/public consultation in order to determine presence or otherwise of graves and any associated sensitive aspects such as sacred sites. The Heritage Practitioner should provide Amafa with metadata of the consultative process covering audio-visual recordings (videos, tapes, photos, attendance registers) and signed transcript by the interviewed individuals. Any other heritage resources exposed during this phase 2 should be recorded/captured in the heritage report. The Phase 2 assessment should cover all borrow pit extensions as the granted permits would have been for the footprint of a specific dimension as per previous applications. This will eliminate the possibility of damaging of informal graves/ unknown graves and challenges of dealing with possible work stoppage emanating from aggrieved communities.

Amafa will issue further comment/decision once we have received the Phase 2 Heritage Impact Assessment

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

Yours faithfully



Pongola to Mpumalanga N2 Road Upgrade

Our Ref: SAH17/11628

Enquiries: Bernadet Pawandiwa
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CaseID: 11628

Date: Friday October 20, 2017

Page No: 2



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Amafa/Heritage KwaZulu Natal

Annie van de Venter Radford
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Amafa/Heritage KwaZulu Natal

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/407701>

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 Amafa immediately.
3. Amafa reserves the right to request additional information as required.



Amafa AkwaZulu-Natali
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