



For all Heritage Matters- because Heritage Matters  
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**LETTER OF EXEMPTION OF HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED  
REFURBISHMENT AND EXPANSION OF THE EXISTING ROOMS OF THE FOUNDER'S CAMP ON  
SPARTA FARMS 259- SAHRIS CASE ID - 18784**

Annie van Deventer-Radford was requested by Zunckel Ecological & Environmental Services to assess the need for a Heritage Impact Assessment (HIA) as envisaged in the National Heritage Resources Act (NHRA) of 1999.

*1. Project background*

Londolozzi Game Reserve (Pty) Ltd. is in the process of applying for environmental authorisation and to undertake a basic assessment of the proposed refurbishment and expansion of the existing rooms at their Founder's Camp on the farm Sparta Farms 259KU in the Sabi Sands Game Reserve. The rooms that make up the Founder's Camp are of the oldest within the tourist complex (initial construction 1980 and a light refurbishment of the existing infrastructure in 2012) and are showing signs of wear and tear that will begin to impact on the standard of the tourism

offering that is Londolozi, i.e. upmarket, low intensity and high-paying guests. It is therefore their intention to refurbish the rooms and to implement relatively minor expansions that will accommodate necessary alterations and client preferences.

The proposed developments are located within the Londolozi Game Reserve on Marthly 258 KU, portion 1. The Londolozi Game Reserve is located within the Sabi Sands Wildtuin (SSW). It falls within the Mpumalanga Province, the Ehlanzeni District Municipality (DC32) and the Bushbuckridge Local Municipality (MP325). The 21-digit Surveyor General code for the property is TOKU00000000025800001. Coordinates for the central point of Founder’s Camp are 24°47'47.71"S and 31°29'49.48"E.

*2. Description of the proposed developments*

It is important to note that the proposed developments are planned to be entirely on the footprints of the existing rooms, with limited expansions from these as indicated in Table 1.

The localities of each room within the Founder’s Camp complex are illustrated in Figure 1.

Table 1: Expansion areas per room

UNIT#	EXPANSION AREA (m <sup>2</sup> )
4	120
5	22
6	3.5
7	3.5
8	11
9	8.8
10	18
Main area	0
<b>Total</b>	<b>186.8</b>



Figure 1: An aerial view of Founder's Camp, Londolozi, showing the position of Rooms 4 to 10 and the main area (© C Goodman).

Of the ten rooms that make up Founder's Camp, rooms 4 to 10 are those planned for refurbishment and expansion, as well as the main area which includes the dining and lounge facilities for the guests. Note that a distinction needs to be made of the expansions that will encroach on land that is currently undisturbed, and thus triggers the need for this assessment, and that which is on the existing cement footprint.

Where new pathways are to be constructed to align with new entrances, it is envisaged that this will require between 10 to 20 m<sup>2</sup> of currently undisturbed land to be cleared. This implies an additional area of approximately 70 to 140 m<sup>2</sup> to the 186.8 m<sup>2</sup> already listed in Table 1.

### *3. Listed activity*

The activity for which environmental authorisation is being sort is Listed Activity 23 of Listing Notice 3 (National Environmental Management Act 107 of 1998, GNR 985, GG 38282 of 4 December 2014, as amended in GG 40772, GN No. 324 of 7 April 2017):

The expansion of (ii) infrastructure or structures where the physical footprint is expanded by 10 square meters or more; where such expansion occurs — (c) if no development setback has been adopted, within 32 meters of a watercourse, measured from the edge of a watercourse; in Mpumalanga: i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies.

#### *4. Legislative requirements with regards to cultural heritage*

##### THE NATIONAL HERITAGE RESOURCES ACT

According to this Act the following is protected as cultural heritage resources:

- a. Archaeological artefact, structures and site older than 100 years
- b. Ethnographic art objects
- c. Objects of decorative and visual arts
- d. Military objects, structures and sites older than 75 years
- e. Historical objects, structures and sites older than 60 years
- f. Proclaimed heritage sites
- g. Graves older than 60 years
- h. Meteorites and palaeontological material
- i. Objects, structures and sites of technological or scientific value.

The National Estate includes the following:

- (a) places, buildings, structures and equipment of cultural significance
- (b) places to which oral traditions are attached or which are associated with living heritage
- (c) historical settlements and townscapes
- (d) landscapes and natural features of cultural significance
- (e) geological sites of scientific or cultural importance
- (f) archaeological and palaeontological sites
- (g) graves and burial grounds, including—
  - (i) ancestral graves
  - (ii) royal graves and graves of traditional leaders
  - (iii) graves of victims of conflict
  - (iv) graves of individuals designated by the Minister by notice in the Gazette
  - (v) historical graves and cemeteries; and
  - (vi) other human remains which are not covered in terms of the Human Tissue Act, 1983

(Act No. 65 of 1983

(h) sites of significance relating to the history of slavery in South Africa

(i) movable objects, including—

(i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens

(ii) objects to which oral traditions are attached or which are associated with living heritage

(iii) ethnographic art and objects

(iv) military objects

(v) objects of decorative or fine art

(vi) objects of scientific or technological interest; and

(vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996).

Section 38(4) of NHRA requires a process of assessment to be followed in order to determine whether any cultural heritage resources are located within an area to be developed, as well as the possible impact of the proposed development thereon. This process must be followed under the following circumstances:

(a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length

(b) the construction of a bridge or similar structure exceeding 50 m in length

(c) any development or other activity which will change the character of a site—

(i) exceeding 5 000 m<sup>2</sup> in extent; or

(ii) involving three or more existing erven or subdivisions thereof; or

(iii) involving three or more erven or divisions thereof which have been consolidated

Within the past five years; or

(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority

(d) the re-zoning of a site exceeding 10 000 m<sup>2</sup> in extent or

(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority.

Section 38(8) is, however, applicable to this proposed project:

(8) The provisions of this section do not apply to a development as described in subsection (1) if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act, 1989 (Act No. 73 of 1989), or the integrated environmental management guidelines issued by the Department of Environment Affairs and Tourism, or the Minerals Act, 1991 (Act No. 50 of 1991), or any other legislation: Provided that the consenting authority must ensure that the evaluation fulfils the requirements of the relevant heritage resources authority in terms of subsection (3), and any comments and recommendations of the relevant heritage resources authority about such development have been considered prior to the granting of the consent.

Notice must also be taken of the following Sections:

- 34. (1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

A structure means any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith.

Alter means any action affecting the structure, appearance or physical properties of a place or object whether by way or structural or other works, by painting, plastering or the decoration or by any other means.

- 35(4) No person may, without a permit issued by the responsible heritage resources authority—

(a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;

(b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;

(c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or

(d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.

#### *5. Project sector*

The sector within which the project falls is “Services - hospitality” and “Transformation of land – indigenous vegetation” is also relevant.

#### *6. Brief history of Founder’s Camp*

Charles Varty and Frank Unger bought the 10 000 acre Sparta farm in 1926 from Transvaal Consolidated Investments (TCI) during an afternoon of tennis in Johannesburg. Sparta was used as a hunting farm. Four thatched mud rondawels were built in the 1930s, along with staff accommodation. Soon after an airstrip was cleared near the Selati Railway line. This was the first time that a private aircraft accessed the local farms. (Varty & Buchanan, 1997)

After Charles Varty died, John Varty and his brother, Dave Varty, terminated the hunting activities and converted it into a game reserve in 1973. The property was renamed Londolozi. (<https://www.londolozi.com/en>) Construction for Varty Camp started in the early 1970s.

#### *7. Cultural / Historical Features*

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit, in their interim comment, requests 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.

Annie van Deventer-Radford has previously completed the HIA for the development of new roads and an abattoir on the same property (SAHRIS CaseID: 13963- Radford van der Venter, A. June 2019. Heritage Impact Assessment Report for the Development of 13 New Roads with a Cumulative Distance of 5.39km, the upgrading and broadening of two Existing roads with a

Cumulative Distance of 7.05km and the development of a Rural Abattoir on Sparta farms 259 KU, Londolozi Game Reserve (Mpumalanga Province).

The author undertook a field survey of the proposed development areas and did identify four heritage resources within the development area.

Site Lon-1 is a Middle Stone Aged Site located in a quarry, the site is of medium local significance, and it will be impacted.

Site Lon-2 is an open -air Middle Stone Aged site of local low significance.

Site Lon-3 is the original Selati Railway Line built by the NZASM; this site is of local high significance.

Site Lon-4 is the remains of 4 hunting rondavals of the Londolozi nature reserve, they were built in the 1920's, this site is of local high significance.

The field assessment for the abovementioned assessment was conducted according to generally accepted HIA practices and aimed at locating all possible objects, sites and features of heritage significance in the area of the proposed development. Whilst conducting this assessment the author was resident in the Founder's Camp complex and recorded the four historical hunting rondavals whilst surveying for any other sites of historical or cultural value. These four structures are the only sites of cultural heritage observed in the Founder's Camp area. The details of these sites are:

SITE Lon-04

-24.796561

31.497471

Site type: Historical

Site period: 1920s

Physical description: The site consists of the four original hunting rondels.

Integrity: Medium

Site extend: Four small structures.

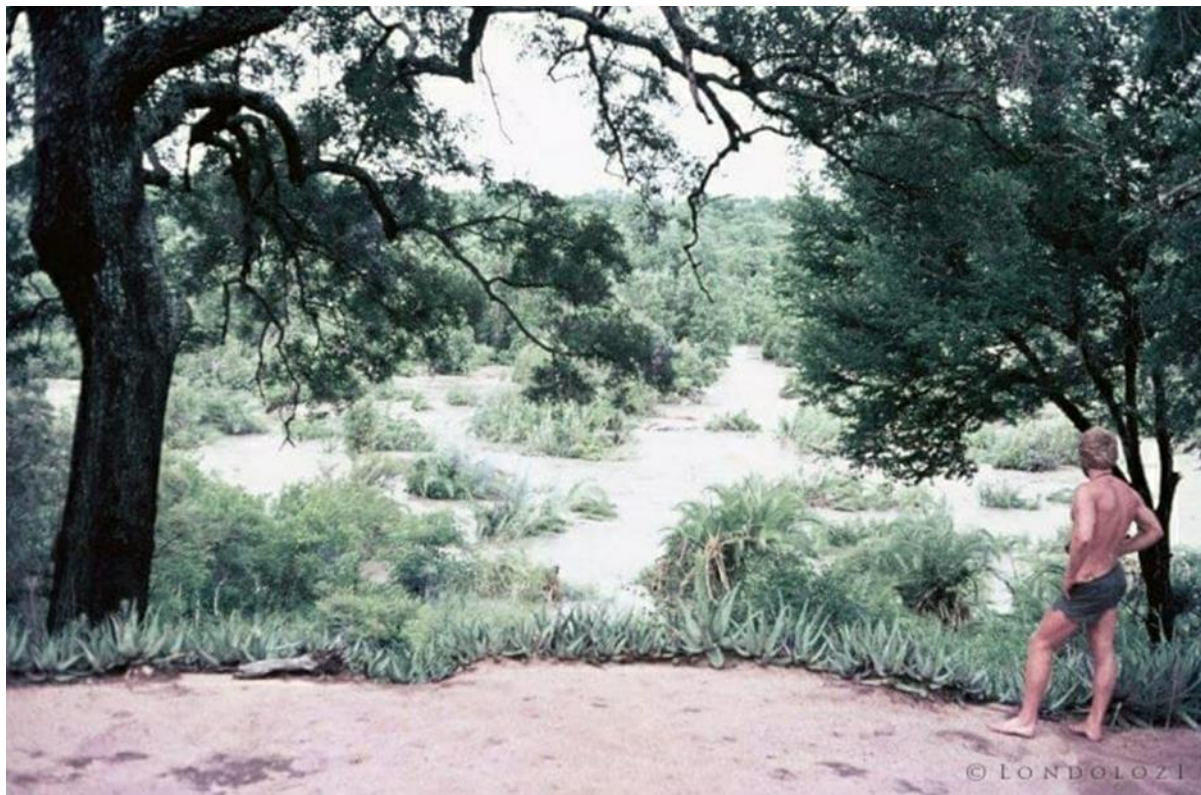
Field rating: Generally Protected A

General statement of significance: Medium



These four thatch mud rondawels were built in 1926, along with staff accommodation. (Varty & Buchanan, 1997). All four still exists today and is part of the tourist infrastructure at the main camp.

It must be noted that some of the proposed activities, on their own, do not trigger current heritage legislation: none of the additional linear infrastructure is 300m of longer, nor are their combined length longer than 300m. And it is also the author's professional opinion that the chances of finding any heritage sites is negligible. This is based on the geography of the area. Any Stone Age tools (especially Olduwan & Acheulean) (if present) would not be in primary context (Delius 2007). EIA sites are often found in specific locations: < 100m from water (riverbank or the confluence of streams). This meant that they were found on alluvial fans, which soils were nutrient rich and suitable for agriculture. Founder's Camp is not located on a flat area nor an alluvial fan (Fig 2). Delius (2007) also mentions that there is a difference in the distribution of Iron Age sites between the northern and southern parts of Mpumalanga, with the north having less of an agricultural focus, but "... with poor soils, but situated near ore resources, with mining by-products found...". Londolozi is located in the northern part of Mpumalanga with no known ore resources nearby. Figure 2, a photo of main deck area taken in the 1970s, clearly shows the area below the Camp is the alluvial plain and that the camp is located on a higher area. The photo also shows the area was already landscaped and impacted on in the 1970s. It is highly unlikely that any EIA or any Iron Age sites would be present.



*Figure 2 Photo of the main deck area (1970s)*

#### *8. Evaluation of the proposed project*

We have evaluated the proposed project and its surroundings, and the following findings pertain:

- (i) The project footprint is mostly situated within the existing Founder's Camp complex and as such is located in an already disturbed area;
- (ii) The area was transformed in the 1930s, 1970s, 1980 and recently in 2016.

It is highly unlikely that any cultural and / or historical heritage features will be found to occur along or within any of the refurbishment sites, as these areas are already disturbed, and their expansion areas are minimal. It is, however, recommended that in the event of chance finds during any refurbishment or operational activities, that work will cease until a Heritage Practitioner is able to assess the artefact/s and guide the management of such heritage finds/sites. 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 and provide guidance in the event of chance finds during any operational activities.

#### *9. Assumptions and limitation*

The author's evaluation of the site and impacts are based on the information and site photos supplied by the EAP and by the author's knowledge of the area.

The underground nature of certain archaeological sites does not eliminate the presence of such features from the development area. Should any heritage features and/or objects be found or observed, a heritage specialist must be contacted straightaway.

Observed or discovered heritage features and/or objects may not be disturbed or removed in any way until such time that the heritage specialist has been able to make an assessment as to the significance of the site (or material) in question. This applies to graves and cemeteries as well. If any graves or burial places are located during the project implementation, the procedures and requirements pertaining to graves and burials will apply as set out below.

#### *10. Conclusion*

It is my considered opinion that:

- the project footprint is already disturbed and utilised for Founder's Camp tourism facilities and as such the proposed project will not alter the character of the site;
- although four buildings older than 60 years are located within the are the proposed project will not impact of these; and
- it is highly unlikely that heritage resources will be present in the project footprint.

We support the submission of Zunckel Ecological & Environmental Services that in accordance with s38(2) of the NHRA the need for an HIA for the project is exempted and so be considered.

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