



an agency of the  
Department of Arts and Culture

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Email: [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)  
Case ID: 25037

Date: Monday, 30 June, 2025

## Interim Comment

### **In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)/In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Anton Pelser  
APelser Archaeological Consulting  
64 Cedar Street  
Lynnwood Ridge  
Pretoria  
0040

EnviroSynergy Consulting (Pty) Ltd was appointed by the Lekwa Local Municipality to undertake an Environmental Authorisation (EA) application for the proposed Sakhile Extension 2 Water Pressure Improvement Project on the Remaining Portion of the Farm Bantoedorp 447 IS and Grooverlangen 409 IS within the Lekwa Local Municipality.

A draft Basic Assessment Report was submitted in terms of the National Environmental Management Act, Act No. 107 of 1998 (NEMA), and the Environmental Impact Assessment Regulations, 2014 as amended. The proposed development includes the construction of reservoirs and a water pipeline to improve water circulation.

Apelser Archaeological Consulting (APAC) was appointed to undertake a specialist Heritage Impact Assessment for the proposed development for input in the EIA process in terms of section 38(8) of the National Heritage Resources Act, Act No. 25 of 1999, and section 24(4)b(ii) of NEMA.

*Pelser, A.J., 2025. Phase 1 Heritage Impact Assessment Report for the Sakhile Extension 2 Water Pressure Improvement Project in Standerton (Lekwa Local Municipality), Mpumalanga.*

A total of 6 heritage sites including LIA sites, rock art, stone packed lines and squares were identified during the assessment. All these sites are outside the proposed development footprint, graded from low to medium heritage significance.

Recommendations made by the specialist report:



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- A Cultural Heritage Management Plan must be developed for the identified heritage resources outside the development footprint with the implementation of a no-go area around the sites.

**The SAHRA Development Applications Unit (DAU) is making the following comments in terms of section 38(8) of the National Heritage Resources Act as contemplated by the EIA process in terms of section 24(4)b(ii) of NEMA:**

- The SAHRA DAU is requesting for a Palaeontological Impact Assessment to be undertaken for the proposed developments in terms of section 38(8) of the NHRA.
- The Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists).
- The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. The Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.
- Based on the HIA recommendation for the development of a CHMP, the SAHRA DAU will impose a condition to approve the CHMP prior to project implementation upon issuing final comments.
- Further comments will be issued upon receipt of the PIA report.

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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John Pakwe  
Heritage Officer: Development Applications Unit  
South African Heritage Resources Agency

## Sakhile Extension 2 Water Pressure Improvement Project



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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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### ADMIN:

Direct URL to case: <https://sahris.org.za/node/378693>