

# THE CONSTRUCTION OF BULK SEWER, PIPE JACKING, REMEDIAL WORKS ON WATER AND SEWER RETICULATION AND CONNECTION OF STANDS AT RAMA CITY X10. CITY OF TSHWANE



an agency of the  
Department of Arts and Culture

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Case ID: 25597

Date: Monday, 14 July, 2025

## Interim Comment

### In terms of Section 35(4) of the National Heritage Resources Act (Act 25 of 1999)

trust Mlilo  
Mudzunga Consulting (Pty) Ltd  
65 Naaldehout Avenue  
Heuweloord  
Centurion  
0157

SAHRIS Site: 383193

Trust Mlilo (Archaeology and Heritage Specialist) has submitted an incident report for the accidental exposure of bones during excavation in the construction of bulk sewer, pipe jacking, remedial works on water and sewer reticulation and connection of stands at Rama City x10, City of Tshwane, Gauteng Province.

On 10th of February 2025, during routine excavation activities for installation of water reticulation infrastructure at the Rama City X10 site, along Siza Street, construction workers uncovered bones which were thought to be human skeletal remains. The discovery occurred at approximately 0.9 meters below ground level. Upon recognizing the potential significance of the find, work at the affected site was immediately halted and the site manager was invited to inspect the site.

### Immediate Action Taken

In compliance with Section 36 of the NHRA and best environmental practices, the following steps were undertaken:

- **Cessation of Work:** Excavation activities within the gazetted 30m buffer zone of the find site were immediately stopped to prevent further disturbance.
- **Securing the Area:** The site was cordoned off, and no unauthorized individuals were allowed access or photograph the site.
- **Notification of Authorities:** The following stakeholders were notified: an archaeologist, Trust Mlilo (PhD and Archaeology) a member of the Association of Southern African Professional Archaeologists (ASAPA),

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was contacted for advice and preliminary inspection of the site. o The South African Police Service (SAPS) (Akasia) was also inspected the site in order to determine if the site may be a crime scene or the exposed remains may be of forensic significance. SAPS documented the site, and they contacted their anthropologist from Cape Town. The SAPS anthropologist in Cape Town spoke with the archaeologist on site regarding the exposed remains.

• **Preliminary Assessment:** The archaeologist arrived on-site and conducted a preliminary visual assessment. The specialist noted that while the bones appear to be of archaeological significance, further analysis is required to confirm whether they are human remains or not. The archaeologist confirmed that the remains could not be conclusively diagnosed because the site was muddy after heavy rains. As such the archaeologist suggested that the developer must appoint a professional archaeologist to apply for a test excavation permit in order to determine the status of the faunal remains. If the remains are found to be human remains, then the archaeologist will apply of a Rescue Permit in terms of the said Act. The process will involve engaging with the local communities and stakeholders as part of the mandatory public consultation process.

## Interim Comment

- The SAHRA Development Applications Unit (DAU) notes the submitted incident report for the accidental exposure of bones during excavation in the construction of bulk sewer, pipe jacking, remedial works on water and sewer reticulation and connection of stands at Rama City x10, City of Tshwane.
- The SAHRA Development Applications Unit (DAU) request that a Methodology and the curator letter be submitted.
- Further comments will be issued upon receipt of the above requested reports.

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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South African Heritage Resources Agency

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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/383194>