



an agency of the  
Department of Arts and Culture

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Date: Wednesday, 16 July, 2025

Case ID: 25615

## Interim Comment

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

Kangra Coal (Pty) Ltd  
Kangra Coal (Pty) Ltd  
Kangra Coal  
Driefontein Farm, Mpumalanga  
Driefontein  
2302

Elemental Sustainability (Pty) Ltd was appointed by Kangra Coal (Pty) Ltd to undertake an Environmental Authorisation (EA) for the proposed Kangra Office and Accommodation Project on the Remaining Extents of Farms Roodekraal 21 HT, Farm Rooikop 18 HT, and Farm Maquasa 19 HT, within the Mkondo Local Municipality, Mpumalanga Province. Ref: MP 30/5/1/2/3/2/1/ 10200 MR.

A draft Basic Assessment Report was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 as amended. The proposed development includes the clearance of vegetation, construction and widening of roads, a mixed use residential, commercial, industrial, recreational and wellness development.

Prof. Marion Bamford and Agri Civils Geo-Tech & Heritage were appointed to undertake specialist Palaeontological and Heritage Impact Assessment studies for input in the EIA process.

*Bamford, M., 2025. Palaeontological Impact Assessment for the proposed new offices and accommodation for Kangra Coal close to the Heyshope Dam, Mpumalanga Province; Desktop Study.*

The proposed development footprint lies on the very highly sensitive Vryheid Formation, however, it is very unlikely that any fossils would be impacted by shallow excavations for foundations and infrastructure.

Cotzee, T., 2025. Phase 1 Heritage Impact Assessment for the Proposed Kangra Office and Accommodation Project near Dirkiesdorp in Mpumalanga Province.

A demolished historical settlement (Site B01) predating 1938 was identified outside the development footprint. A grave was identified within Site B01 considered to be over 60 years due to the foundation mounds found in



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the vicinity of the grave. The report indicates a high possibility of additional graves existing within Site B01. Site B01 and the grave are collectively Graded to be of Local High Heritage Significance.

Recommendations made by the specialist reports:

- Chance Finds Protocols must be implemented for potential subsurface finds.
- No mitigation is required for Site B01 and the grave found within the site.

### Interim Comment:

**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(iii) of NEMA:**

- The SAHRA DAU acknowledges receipt of specialist reports.
- The PIA report determines that, the highly sensitive palaeontological layers underlying the development footprint will not be impacted on due to the material between the fossil layer and surface.
- Reliance of such material is deemed not adequate to mitigate the potential impact posed on the highly sensitive fossil layer by the proposed development and, therefore;
- the SAHRA DAU is requesting a field-based Palaeontological Impact Assessment report for the proposed developments in terms of section 38(8) of the NHRA.
- The desktop 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.
- Further comments will be issued upon receipt of the field-based 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

## Proposed Kangra Office and Accommodation Project



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South African Heritage Resources Agency

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South African Heritage Resources Agency

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### ADMIN:

Direct URL to case: <https://sahris.org.za/node/383227>