



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Nokukhanya Khumalo

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Email: nkhumalo@sahra.org.za

Case ID: 21434

Date: Friday, 25 July, 2025

Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Neels Kruger
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Amberfield Heights
Centurion
0149

BVi Consulting Engineer (Pty) Ltd, on behalf of SANRAL (SOC) Ltd, has appointed CES Environmental and Social Advisory Services (Pty) Ltd to undertake a Scoping and Environmental Impact Assessment application process in support for an Integrated Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended, for activities that trigger the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended for the upgrade and maintenance of R516 Section 1 (R516-01) road. The route starts at KM 36.67, approximately 4 km east of the Toospruit River and runs eastwards, ending at KM 83.80 at the R101 intersection in Bela Bela, in the Thabazimbi and Bela Bela Local Municipalities of the Limpopo Province.

The roadworks will include rehabilitating the existing road pavement; widening of the current road cross section to include 3.0 m surfaced shoulders; improvements to the vertical and horizontal alignment; addition of turning lanes at nine (9) intersections; the realignment of one staggered intersection; temporary widening of existing road to accommodate two-way traffic during construction; and removal of vegetation in excess of 1 hectare outside the road reserve for possible stockpile areas. It will also include the widening of 6 bridges and culverts, replacement of 1 culvert and possibly opening one burrow pit 6 ha in extent for source material. This application is for the burrow pit; the road upgrades are in a separate EIAR process and the SAHRIS application is on case ID 21435.

Kruger, N. September 2021. PROPOSED R516 UPGRADE AND QUARRY PROJECT SECTION 1 (33799.00C-L-084), WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE. Archaeological Impact Assessment.

The author undertook a field survey and identified the foundation remains of a building that was mapped in the 1975 topographical map. The remains are of low significance and sufficiently documented in the report. The area has been used for agricultural activities and construction of the existing road construction. The author



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recommends chance finds procedures if archaeological sites or graves are exposed during development activities, it should immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made. The author also recommends that the EIA public participation and social consultative process address the possibility of heritage resources graves occurring in the project area.

The SAHRA issued an Interim Comment dated 21/11/2023 that requesting a Palaeontological Impact Assessment (PIA) by a suitably qualified palaeontologist. The report was submitted 01/07/2025 along with an addendum to the 2021 HIA report.

Kruger, N. June 2025. MEMORANDUM TO ACCOMPANY ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) FOR THE PROPOSED R516 UPGRADE & QUARRY (33799.00C-L-084) PROJECT IN THE WATERBERG DISTRICT MUNICIPALITY OF THE LIMPOPO PROVINCE.

The author conducted a further detailed assessment of the three bridges along the road upgrade routes that will be demolished during the construction phase. The three bridges (1142, 136B, 1643) are over 60 years in age and will require a destruction permit from the Limpopo Heritage Resources Authority (LIHRA)

Butler, E. July 2025. PALAEOONTOLOGICAL DESKTOP ASSESSMENT PROPOSED R516 UPGRADE AND QUARRY PROJECT SECTION 1 (33799.00C-L-084), WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.

The author undertook a desktop assessment of the underlying geology of the road upgrades and the quarry that will be supplying aggregate for the upgrades. The road is geology consists of Tertiary to Quaternary superficial deposits, the Letaba, Clarens and Irrigasie Formations of the Karoo Supergroup; as well as the main granite and Nebo Granite (Lebowa Granite Suite), both of the Bushveld Complex. The Quarry is underlain by Swaershoek Formation (Nylstroom Subgroup, Waterberg Group) as well as Schrikkloof Formation of the Rooiberg Group, Transvaal Supergroup. The sedimentary rocks of the Karoo Supergroup in the study area have a High Palaeontological significance but the road upgrades will be within the existing servitude. The author assess the overall potential impacts to be medium during construction phase and low after the construction. The author recommends the following to be implemented during construction to lessen the potential impacts to significant geology:

- If Palaeontological Heritage is uncovered during surface clearing and excavations the Chance Find Protocol attached should be implemented immediately.



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- Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA.
- Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA.
- These recommendations should be incorporated into the Environmental Management Programme (EMPr) for the Road Upgrade and associated Burrow Pit Project.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR:

- 38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development;
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. These further additional comments apply:
 - The chance finds procedure must be included into the EMPr for implementation;
 - A section 34 permit application must be applied for to the LIHRA for the alteration or destruction of the 3 bridges identified in the HIA report;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU (Nokukhanya Khumalo/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (Nokukhanya Khumalo/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as

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possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Yours faithfully

Nokukhanya Khumalo
Senior Heritage Officer
South African Heritage Resources Agency

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

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.

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2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/260362>