

18 September 2023

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RESPONSE TO INTERIM COMMENTS: THE PROPOSED PROJECT FIFTY-EIGHT DEVELOPMENT ON PORTION 58 OF THE FARM KROMDRAAI 520 JQ, CRADLE OF HUMANKIND, MOGALE CITY LOCAL MUNICIPALITY, GAUTENG

Thank you for your interim comments on the above proposed development, (dated 8 September 2023 and received on 11 September 2023).

We have addressed all comments in table format as outlined in **Table 1** below:

Regards,



Hanlie van Greunen

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For: Environmental Consultants International (Pty) Ltd



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Table 1: Response to comments received on 11 September 2023

SAHRA INTERIM COMMENTS OF 8 SEPTEMBER	RESPONSE BY ECI
<p>Interim Comment</p> <p>In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)</p> <p>Attention: Anderbridge Investments (Pty) Ltd</p> <p>Environmental Consultants International (Pty) Ltd (ECI) was appointed by Anderbridge Investments (Pty) Ltd (Proponent) as Environmental Assessment Practitioner (EAP) for the development of a tourism facility on Portion 58 of the Farm Kromdraai 520 JQ in the Cradle of Humankind, Mogale City Local Municipality, Gauteng.</p> <p>Anderbridge Investments (Pty) Ltd proposes the development of a tourism facility on Portion 58 of the Farm Kromdraai 520 JQ in the Cradle of Humankind, Mogale City Local Municipality, Gauteng. The development will consist of a hotel, an ashram sanctuary, a healing centre and a farming component with a total footprint of 8.16 hectares. The development is located within the core area of the Cradle of Humankind World Heritage Site (COHWHS) and in close proximity to Kromdraai and Sterkfontein National Heritage Sites. A Draft Basic Assessment Report and a Heritage Impact Assessment were submitted in support of this application. The individual components of the development consist of the following infrastructure:</p> <ul style="list-style-type: none"> • Six (6) 275 m² residential villas; • Sixteen (16) 175 m² residential villas; • Eighteen (18) 65 m² residential suites; • Nineteen (19) 40 m² residential rooms; • Six (6) 10 m² residential pods; • 200 m² wellbeing facility (incl. hydrotherapy, treatments rooms, and a gym); • 600 m² 23-room residency; • 550 m² lounge/event space; • 200 m² restaurant, and • 520 m² central facilities. 	<p>Thank you for providing us with Interim Comments (received 11 September 2023)</p> <p>Kindly note that the project description has been amended in the updated Environmental Management Programme as attached. The overall scope has been reduced and the impact is therefore now lower than previously proposed.</p> <p><u>The updated project description (as provisionally approved by DFFE) is as follows:</u></p> <p>Project Fifty-Eight aims to develop a tourism facility on Portion 58 of the Farm Kromdraai 520 JQ. The proposed facility can be defined as “a place to restore conscious appreciation for life in all its manifestations and create a model for a regenerative society”.</p> <p>The property size is approximately 163.3 hectares (ha) in extent and the proposed development will include the following facilities with a total footprint of 6500m².</p> <ul style="list-style-type: none"> • Six (6) 300m² residential villas. • Ten (10) 175m² residential villas. • Twelve (12) 20m² pods and Eight (8) Hikers huts with 100m² service facilities. • 200m² wellbeing facility (incl. hydrotherapy, treatments rooms and a gym). • Existing building that has been renovated and is operational. • Erected on the existing slab of the former stables and staff accommodation. • 300m² “third space” and will be a communal lounge, library and covering area for guests and the community. • 15 rooms, guest services, reception, practitioners' rooms, toilet and administration facilities • to be erected on the existing building that is an old workshop, has been renovated. • 500m² AGRI-HUB packing, sorting, storing and distributing community farm produce, implements, tools, workshop and staff quarters. • All guest parking will be at Nirox Sculpture Park but there will be a parking area on property.

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<p>SAHRA for comments. It is not possible for SAHRA to know at this stage if the VIA considered Kromdraai (Portion 5) and Sterkfontein (Portion 65 of Swartskrans 172 IQ) NHS as visual receptors. It is noted that the draft BAR indicated a low visual impact on adjacent properties and the R540 and R374;</p> <ul style="list-style-type: none"> • Further clarity must be provided on the age of the cemetery and the graves; • SAHRA will provide a Final Comment on the case as on receipt of the requested information. <p>Since the issuing of the interim comment on 28/05/2021 an updated Heritage Impact Assessment (HIA) and Field-based Palaeontological Impact Assessment (PIA) have been submitted to the SAHRIS case application for commenting and review by SAHRA.</p> <p>Environmental Consultants International, Leonie Marais, and Dr. Fourie, H., have appointed to provide the heritage specialist reports as part of the EA process as required in terms of section 24(4)b(iii) of NEMA and in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).</p> <p>Marais, L. March 2021. Phase 1 Heritage Impact Assessment (HIA) The Proposed Project Fifty-Eight on Portion 58 of the Farm Kromdraai 520 JQ, Gauteng Province.</p> <p>The updated HIA study confirms that the identified Burial Ground and Graves are older than 60 years.</p> <p>Fourie, H. June 2021. The Proposed Project Fifty-Eight on Portion 58 of the Farm Kromdraai 520 JG Mogale City Local Municipality, West Rand District Municipality. Gauteng Province: Palaeontological Impact Assessment Phase 1.</p> <p>The study area is underlain by the Kameeldoorns formation, Black Reef Formation and the Malmani Dolomites which are known to preserve stromatolites. Dolomite was observed at a stream present in the study area and the crop area, and no fossils were observed.</p> <p>The following recommendation are made:</p>	<p>Sterkfontein Caves WHS) were assessed. It can be confirmed that no components of the proposed development will be visible from these two sensitive receptors.</p> <ul style="list-style-type: none"> • The updated HIA study (as attached) confirms that the identified Burial Ground and Graves are older than 60 years. • All final comments / recommendations will be included in the EMPr.

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<ul style="list-style-type: none"> • The protocol for Chance Finds and Management Plan is recommended and attached to the report. • It is recommended that a plio-pleistocene palaeoanthropologist monitors the site during excavations. • The ECO must survey for fossils before and/or after clearing, blasting, drilling or excavation. • The ECO must familiarise him or herself with the formation present and fossils and receive pre-construction training. • Care must be taken during dolomite risk assessment as stromatolites may be present. <p>The following studies and clarity as previous requested have not been submitted along with the updated HIA and Field-based PIA to SAHRA for review and commenting:</p> <ul style="list-style-type: none"> • The Visual Impact Assessment (VIA) and Viewshed Analysis mentioned in the BAR must be submitted to SAHRA for comments. It is not possible for SAHRA to know at this stage if the VIA considered Kromdraai (Portion 5) and Sterkfontein (Portion 65 of Swartskrans 172 IQ) NHS as visual receptors. It is noted that the draft BAR indicated a low visual impact on adjacent properties and the R540 and R374. <p>Since the issuing of the above Interim Comment, SAHRA has been notified that the EA was initially issued and subsequently appealed, to which the EA has now been reissued. SAHRA must state this process is not inline with the provisions of section 38(8) of the NHRA, as no Final Comment issued by SAHRA was considered in the granting of the EA. Condition 33 and 34 of the reissued EA state that the full VIA must be submitted to SAHRA for approval prior to commencement of the project and the findings of the VIA and SAHRAs approval must be incorporated into the final EMPr. The VIA has been submitted for review (01/08/2023).</p>	<p>These site-specific specialist recommendations have been included in the updated Environmental Management Programme (as attached) see Sections 8.2.9 and 8.4.1(m) and Appendix B, as follows:</p> <ul style="list-style-type: none"> • The Protocol for Chance Finds and Management (Fourie, H. June 2021 – see Appendix B of the EMPr) must be endorsed by the responsible official/s at Maropeng and must be implemented. • A plio-pleistocene paleoanthropologist must monitor the site during excavations. • The ECO must survey for fossils before and/or after clearing, and excavation (no drilling or blasting will take place). • The ECO must familiarise him or herself with the formation present and fossils and receive pre-construction training. • Care must be taken during dolomite risk assessment as stromatolites may be present. <ul style="list-style-type: none"> • An updated VIA Report is attached – updates are marked in red for ease of reference. The visual impact on the sensitive receptors (Ptn 5 of Kromdraai 520 JQ and the Sterkfontein Caves WHS) were assessed. It can be confirmed that no components of the proposed development will be visible from these two sensitive receptors. <ul style="list-style-type: none"> • The Applicant is aware that the development has only been conditionally approved by DFFE and understands that SAHRA's approval (and final recommendations) need to form part of the Final EMPr.- to be approved by DFFE, before any construction can commence.

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<p>Van Greunen, H. 2022. The Proposed Project 58 Development on Portion 58 of the Farm Kromdraai 520 JQ:</p> <p>Visual Impact Assessment Report.</p> <p>The report states that the majority of the facility will be concealed by the high VAC of the landscape and will not be visible to residents or motorists, including tourists. The VIA did not include Kromdraai and Sterkfontein as visual receptors as noted in previous comments and therefore the visual impact to these sites is unknown.</p> <p>Interim Comment</p> <p>SAHRA requests that the VIA be amended to provide specific results regarding the possible visual impact of the development on Kromdraai and Sterkfontein National Heritage Sites. This must include a viewshed analysis and photomontage from the two sites showing the position of the proposed development and the expected finished development appearance.</p> <p>Further comments will be issued upon receipt of the requested amended report.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	<ul style="list-style-type: none"> • An updated VIA Report is attached – updates are marked in red for ease of reference. The visual impact on the sensitive receptors (Ptn 5 of Kromdraai 520 JQ and the Sterkfontein Caves WHS) were assessed. It can be confirmed that no components of the proposed development will be visible from these two sensitive receptors. • All final comments / recommendations will be included in the EMPr.