

Our Ref:



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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CaseID: 12431

Date: Tuesday January 22, 2019  
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## Final Comment

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Sun International (Pty) Ltd

### **Environmental Impact Assessment for the proposed Future Developments within the Sun City Resort Complex, North West Province.**

Digby Wells Environmental was appointed by Sun International (Pty) Ltd to undertake an Environmental Authorisation (EA) Application process for proposed future developments within the Sun City Resort Complex, North West Province.

A draft Scoping Report has completed as per the National Environmental Management Act, 107 of 1998 (NEMA), and NEMA Environmental Impact Assessment (EIA) Regulations. The proposed developments will include several Resort Expansion Projects, Utilities and Services Projects and Monitoring Projects.

*Du Piesanie, J and Hardwick, S. 2018. Notification of Intent to Develop: Environmental Impact Assessment for proposed Future Developments within the Sun City Complex, North West Province.*

The NID notes the various developments and activities contained within the overall proposal i.e. Resort expansion projects, Utilities and Service Projects and Monitoring Projects. The NID notes that a Heritage Impact Assessment (HIA) inclusive of an Archaeological Component must be conducted for the development applications.

*Du Piesanie, J; Hardwick, S and Nel, J. 2018. Heritage Scoping Report - Environmental Impact Assessment for Proposed Future Developments within the Sun City Complex, North West Province.*

It is noted that the palaeontological component of the report was written by an archaeologist but reviewed by a qualified palaeontologist. The study is underlain by the Pilanesberg Alkaline Province that does not contain fossils. This formation is interlinked with Quaternary Aged sands that have the potential to include fossil remains.

Other heritage resources identified in the broader study area include Stone Age resources, Later Farming Community (LFC) resources, historical built environment, and burial grounds and graves. A total of 15 heritage



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resources were identified within the site-specific project area including LFC resources and more recent heritage. One particular LFC stone walled site, *Itlholanoga*, has been rated as a site of very high Grade II significance.

The recommendations provided in the report include the following:

- It is proposed that the pending Heritage Impact Assessment (HIA) to be completed as part of the EIA phase of the EA application focus on archaeological resources;
- A Request for Exemption from further palaeontological assessment on the condition that a Fossil Finds Procedure (FFP) is implemented prior to the commencement of the project. A FFP is provided in the report.

In an Interim Comment issued on the 24/08/2018, SAHRA noted the pending HIA inclusive of an archaeological component and stated that no further assessment of palaeontological resources would be required on the condition that an FFP is implemented as part of the Environmental Management Programme (EMPr). The HIA has since been submitted along with a draft EIA for review.

*Du Piesanie, J and Hardwick, S. 2018. Heritage Impact Assessment - Environmental Impact Assessment for the Proposed Future Developments within the Sun City Resort Complex, North West Province.*

A total of 10 heritage resources were identified within the proposed development area. These heritage resources include five Late Farming Community (LFC) sites of negligible heritage significance, one LFS stone walled site of low heritage significance, three LFC stone walled sites of medium heritage significance and one LFC stone walled site (*Itlholanoga*) of very high heritage significance. Of these sites, the proposed development poses a direct risk/impact to *Itlholanoga* and STW-002.

The following recommendations are provided in the report:

- The Project design must be altered to avoid, or at the very least limit, the identified potential direct negative impacts to the heritage resources *Itlholanoga* and STW-002. In terms of the pipeline proposed near STW-002, this can be achieved by routing the pipeline within the existing road;
- Sun International must enlist the services of a qualified archaeologist to undertake detailed mapping of the affected sites prior to the commencement of construction activities. The archaeologist must undertake a Watching Brief during earth-moving activities associated with the construction phase;

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- No work on the developments proposed near the site *Itlholanoga* and/or STW-002 (i.e. the reservoirs and/or the pipeline) may be undertaken without a permit issued in respect of Section 35 of the NHRA and Chapters II and IV of the NHRA Regulations, 2000 (GN R 548), authorising the partial destruction of destruction of the archaeological site; and
- Sun International must develop and implement a Conservation Management plan (CMP) as a condition of authorisation and for approval by SAHRA and NWPHERA. The CMP must include *Itlholanoga* and STW-002 and must consider these resources in their entirety. These sites may present opportunities as tourist attractions, provided the correct management, which should be explored in the CMP.

## Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the recommendations of the submitted specialist reports and has no objection to the proposed development. The recommendations of the specialists and the following conditions must be included in the Final EIA and Environmental Management Programme (EMPr):

- A no-go development buffer of 50 m should be maintained around *Itlholanoga* and/or STW-002;
- A report detailing the results of the recommended Watching Brief must be submitted to SAHRA upon completion of the construction phase;
- The recommended CMP must be submitted to SAHRA for comment prior to the construction phase;
- The Final EIA and EMPr must be submitted to SAHRA for record purposes;
- 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 APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 35(3) and 36(6) of the NHRA. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. 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

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above in the case header.

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/503591>  
(, Ref: )

**Terms & Conditions:**

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