

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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Enquiries: Natasha Higgitt
Tel: 021 462 4502
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CaseID: 12431

Date: Monday August 05, 2019
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Letter

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.

Thank you for submitting the requested Conservation Management Plan (CMP) for the protection of heritage resources identified within the proposed development areas within the Sun City Resort Complex, North West Province.

In a Final Comment issued on 22/01/2019 for SAHRIS Case ID 12431, SAHRA supported the recommendations within the submitted Heritage Impact Assessment (HIA) that CMP be conducted to provide for the management of the heritage resources including the sites of *Itholanoga* and STW-002. It must be noted that this management plan has been submitted for both SAHRIS Case ID 12431 and 12749 (<https://sahris.sahra.org.za/cases/sun4270-sun-city-environmental-authorisation>).

Du Piesanie, J. 2019. Heritage Conservation Management Plan: The Sun City Resort Complex Heritage Conservation Management Plan Project 2019 – 2024.

The development of the HCMP included stakeholder consultation, detailed mapping of the identified sites by using LIDAR scanning techniques, defining roles and responsibilities, a SWOT analysis, project planning including objectives, targets and strategies, provision of preservation mechanisms, identification of current and future risks with preventative protection procedures, monitoring actions, reporting requirements, awareness strategies, and lastly: sustainable use and vision for the future of the sites.

The objectives, targets and strategies (Section 5.3 of the HMP), preventative protection measures (section 6.2 of the HMP), monitoring measures (section 6.3 of the HMP), preventative and general preventative protection measures (table 6-4) provided in the report include, but are not limited to the following:

- Table 6-4: A 25 m buffer is to be adhered to around *Itholanoga* during the pre-construction and construction phases;
- The implementation of a Chance Finds Procedure (CFP);

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- Place signage along routes and in proximity to heritage resources to inform users of their presence;
- Complete monthly maintenance to remove overgrowth and reduce the intensity of natural degradation;
- Compile Watching Brief Report.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) unit is satisfied that the submitted HMP complies with the 2006 SAHRA Guidelines for Site Management Plans and supports the recommendations and procedures contained therein, on the condition that the following is amended:

SAHRA requests that the 25 m buffer as noted in the HMP around *Itholanoga* be increased to 50 m as per the Final Comment issued for the activities as part of the application for SAHRIS Case ID 12431. The Final Comment for SAHRIS Case ID 12749 noted a 100 m buffer, however, SAHRA will revise that comment to be in line with the Final Comment issued for 12431, i.e. a 50 m buffer is sufficient for all activities.

As per the planned reporting procedures outlined in section 6 and vision described in section 9 of the HMP, SAHRA awaits the following once completed:

- Watching Brief Reports;
- Conservation Strategy;
- The audit of the heritage resources inventory in the year 2024;
- The reviewed HMP in 2024;
- While *Itholanoga* is not formally protected, it has been rated as a site of Grade 2 significance and therefore in best practice, all posters, booklets and digital material (awareness material) and proposed museum exhibits to be submitted to SAHRA as per section 44 of the NHRA.

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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Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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>
(NWDACERD, Ref: NWP/EIA/22/2018)