



an agency of the  
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CaseID: 12748

Date: Tuesday May 07, 2019  
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## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Shalimaloq Investments CC

**The proposed project components would include shops, restaurants, a hotel, private resort, a medical facility / hospital, etc. with subservient services. The total area involves approximately 30 hectares. The project is situated in the Hartebeespoort Dam area (at the Damdoryn 4-way stop), Madibeng Local Municipality, North West Province**

Archaetnos cc was commissioned by Landscape Dynamics Environmental Consultants to conduct a Cultural Heritage Impact Assessment (HIA) for the proposed Northwest Gateway Project. Northwest Gateway project is a mixed development which would include residential units, a hotel, hospital, private resort, retail area and subservient services. The project site is situated in the Hartebeestpoort Dam area – at the Damdoryn four-way stop. The heritage impact assessment was conducted on the remainder of portion 151, and portions 221, 233, 234, 235, 236 and 237 of farm Hartebeestfontein 445 JQ in the Madibeng Local Municipality, North-West Province.

Landscape Dynamics Environmental Consultants was appointed by Shalimoq Investments (Pty) Ltd to apply for Environmental Authorisation (EA) for the Northwest Gateway Project as per the National Environmental Management Act (NEMA), Act No. 107 of 1998 and Environmental Impact Assessment Regulations published in Government Notice No. R. 982, December 2014 (as amended).

A Heritage Impact Assessment (HIA) in terms of section 38(8) of the National Heritage Resources Act, No. 25 of 1999 (NHRA) was submitted by Prof. A.C. van Vollenhoven, an independent specialist from Archaetnos cc.

*Van Vollenhoven, A.C. April 2018. A Report on a Cultural Heritage Impact Assessment for the Northwest Gateway Project, on the from Hartebeestfontein 445 JQ, North-West Province.*

The HIA is based on the author's field survey of remainder of portion 151, and portions 21, 233, 234, 235, 236 and 237 of farm Hartebeestfontein 445 JQ, in the Madibeng Local Municipality, North-West Province. The author emphasizes that the field survey was confined to areas indicated by the company's client. The author reports on eight identified sites of cultural heritage significance. The identified sites, and the recommended field grading, are:



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- A small grave yard (Site no. 2) with a field grading of 3b (III B);
- Three stone and clay houses (Site no. 1, 3, 4) with a field grading of 3b (III B);
- Three sites (Site no. 5, 6, 7) of large temporary storage building with field grading of 3b (III B);
- Farm yard (Site no. 8) with a field rating of 3b (III B).

Based on the observations the author recommends the following:

- Fence in the graves and draft management plan for sustainable preserve of site – to be executed in a case where the graves are not in danger, and a buffer zone area of 225m<sup>2</sup> around the graves which is also included in the development zone to be established;
- Or exhume the remains and relocate in a case of direct impact by development activities and a permit needs to be attained by the relevant heritage authority – this should be undertaken by an archaeologist (if grave older than 60 years) or undertaker (if grave is younger than 60 years). Given the above suggestions, and based on the development type plans, the author reports that keeping the graves in situ is the best option;
- The three stone and clay houses should be documented into a heritage register and demolished following test excavations, subject to permit lodged to the relevant heritage authority;
- The development may only continue after receiving the necessary comments from the Burial Grounds and Graves Unit of SAHRA and the North-West Provincial Heritage Resources Authority and implementing their decision;
- In the case that archaeological and/or historical sites artefacts are found during development and construction, all activities must be ceased, and a qualified archaeologist should be contacted for further investigation.

On the 23rd of August 2018, AMP issued an interim comment to the applicant based on the contents of the above HIA. For an informed final comment, AMP requested the following: a revised Heritage Impact Assessment to include the assessment of historical canals on the north-east boarder of the location of the proposed development as well as a verification of the identified graves, by a qualified archaeologist; a visual impact assessment and traffic impact assessment on the historical Hartebeespoort dam wall; a field palaeontological impact assessment carried out by a suitability qualified palaeontologist; the final scoping report as well as a draft environmental impact report at the start of the public participation period.

On the 19th of March 2019, AMP received a revised HIA, PIA, VIA, TIA and a draft EIR.



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*Van Vollenhoven, A.C. April 2018. A Revised Report on a Cultural Heritage Impact Assessment for the Northwest Gateway Project, on the from Hartebeestfontein 445 JQ, North-West Province.*

The revised HIA included the assessment of the historical canal, referred to as aqueducts. In the report, the aqueducts are identified as heritage features and recommended for inclusion into the heritage register and given 3b (IIIB) field grading. The field grading was concluded based no specific heritage apart from association to the Hartebeestpoort Dam water scheme therefore hold a low significance. Additionally, the author recommends that the aqueducts may be mitigated which is subject through a permit application lodge with the relevant heritage authority.

*Bamford, M. September 2018. Palaeontological Impact Assessment for the proposed North West Gateway township Project, Farm Hartebeesfontein 445 JQ, North West Province*

Desktop study consulted geological maps, literature, palaeontological databases and published and unpublished records from ESI at the University of Witwaterand and SAHRA database to inform the geological and palaeontological context of the proposed area.

Geological structures, igneous rocks, suggests that the rocks are too old to contain any fossils. There is a small chance of finding trace fossils due to the Magaliesburg Formation and reported trace find 100km east of the proposed area of development therefore chance Find Protocol has been added. Potential impact to fossil heritage resources is extremely low.

Recommends inclusion of the Chance Find Protocol in EMPPr.

*Young, G. A. October 2018. Draft Visual Impact Report – Northwest Gateway Project Hartbeesfontein, North West Province.*

Visual scoping study, with a radius of 7.5 km, was carried out on the proposed area. The author used a combination of quantitative and qualitative evaluation criteria on the landscape and visual assessment; site visits; proposed project documents and a visual simulator. Based on this information the project can still be seen form upper slopes of Magaliesberg, however argues that all other developments can be seen from this view point as well. The author further shows a visual simulator from the Hartebeespoort dam wall (fig. 12 – pg 30) and concludes that the development will be screened, by natural vegetation.



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- The author concludes to the following:
- The proposed project has a low intrusive nature.
- Visual impact is low therefore from a visual aspect the project can proceed as proposed;
- Mitigation and management measures must be effectively implemented, managed and monitored as well as a public participation is held during this process.
- However, notes visual resource impact would result from construction, operation and maintenance and predicts a low impact.

*Civiconsult. January 2019. Traffic Impact Study: NW Gateway Extension 2 Township Establishment. The Remainder of Portion 151 and Portions 233, 234, 235, 236 and 237 of the Farm Hartbeestfontein No. 445-JQ, Madibeng Local Municipality, North West Province*

The traffic assessment, based on comparison between 2018 and future (2023) increase in traffic delay on the single lane road of the dam wall, shows that the traffic delay would increase with the construction of the proposed development. However, the increase would be within acceptable margins of predictability. There the author concludes that the traffic increase would not be detrimental to the wall.

In an Interim Comment issued on the 18 April 2019, SAHRA requested that a revised HIA be submitted to include a map clearly indicating the location of the assessed historical canals/aqueducts.

Since the issuing of the Interim Comment, a revised HIA with a map indicating the location of the assessed aqueduct.

### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit refers to the first Interim Comment issued on the 23/08/2018 where the location of the aqueduct was highlighted by SAHRA. The location shown on figure 20 on page 36 of the revised HIA highlights the incorrect feature and therefore the historical canals have not been adequately assessed. The canal is located in the top right-hand corner of figure 20 of the HIA and on the edge of the proposed development.

This heritage feature must be assessed before further comments can be issued.

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

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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

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/510024>  
(, Ref: )