

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: 12749

Date: Friday September 07, 2018
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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 Authorisation (Basic Assessment) Process for Developments on the Farms Doornhoek 910 JQ and Ledig 909 JQ in the North West Province.

MDT Environmental (Pty) Ltd was appointed by Sun International (Pty) Ltd to undertake an Environmental Authorisation (EA) Application process for the proposed Sun City Chairlift Project within the Sun City complex, North West Province.

A Basic Assessment Report (BAR) has completed as per the National Environmental Management Act, 107 of 1998 (NEMA), and NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of a 900 m chairlift that will consist of a top and bottom station, with pylons every 100 m. A trail will be developed directly below the chairlift for maintenance activities. A 1100 m hiking trail will be developed along the northern slope of the Sun City mountain.

Du Piesanie, J. 2018. Notification of Intent to Develop: Sun International Environmental Authorisation Process for Developments on the Farms Doornhoek 910 JQ and Ledig 909 JQ.

The NID notes the proposed chairlift development activities and location within the Sun City Complex and notes the need for a Heritage Impact Assessment (HIA) inclusive of an archaeological component to be conducted for the proposed development. The report notes that the proposed development is located in an area that is underlain by the Pilansberg Alkaline Province Formation (zero palaeontological potential).

Du Piesanie, J. 2018. Heritage Basic Assessment Report: Sun International Environmental Authorisation Process for Developments on the Farms Doornhoek 910 JQ and Ledig 909 JQ.

A limitation noted in the report states that the inclusion of the hiking trail occurred after the field survey was completed, and therefore was not subjected to a detailed walk-down.

The report notes that the proposed development is underlain by the Pilansberg Alkaline Province Formation (zero palaeontological potential) and therefore impacts to palaeontological resources were not considered or



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assessed further. A recommendation and Request for Exemption from further palaeontological studies is made in the report.

A Late Farming Community stonewalled settlement *Itlholanoga* is located within the footprint of the proposed chairlift. This site was excavated in 1986 and recovered diagnostic ceramics include those of the Uitkomst and Buispoort facies. The site was partly mapped in 2005 and 2006 and was classified as consisting of two patterns, an earlier Type N and later Molokwane settlement type pattern. Artefacts and features identified at site include preserved hut foundations, hearths, ceramic vessels and shards, metal artefacts and beads. Based on these results, the proposed timeframes of the settlements note an early Tlokwa occupations and then a later Kgatla occupation. The site is rated as a site of very high cultural significance and proposed to be graded as a Grade II Heritage Site.

Negative direct impacts during construction include damage or destruction to surface features. Potential indirect impacts during the operational phase include erosion that may expose sub-surface, possible looting and vandalism due to the presence of the hiking trail and increased human traffic. No impacts from the proposed chair lift are expected as the footprint has been altered to avoid the identified heritage site. The southern route alternative of the hiking trail was found to be the preferred route as the impacts to heritage were found to be less than that of the northern alternative.

Recommendations provided in the report include the following:

- Sun International must commission a Heritage Site Management Plan (HSMP) for *Itlholanoga* as a condition of authorisation for approval by the South African Heritage Resources Agency (SAHRA). The HSMP must be developed in support of a Grade II Site Nomination and for the appropriate management of the site during the construction and operation of the Project. The HSMP must include project specific Chance Find Protocols (CFPs) and aim to control the elements that make up the physical and social environment of the site, i.e. its physical condition, public visitors and interpretation, and promote / enhance its conservation and maintenance through deliberate and thoughtful design; and
- A Watching Brief by a qualified archaeologist during the construction phase of the Project which will entail the on-site supervision of all activities to guide the development and record any exposed sub-surface features or material culture;
- Through the analysis, Digby Wells is of the opinion that if the recommended management measures are implemented, positive impacts through the sustainable use and development of *Itlholanoga* can be

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achieved.

A Heritage Sensitivity Mapping Report was conducted for proposed holiday units which informed the decision making and mitigation measures for the chairlift project as well.

Du Piesanie, J and Nel. J. 2018. Heritage Sensitivity Mapping Report.

The results of the Heritage Sensitivity Mapping found that the preferred location of the proposed 65 holiday units for proposed development is unsuitable due to the known heritage sensitivities of the *Itlholanoga* heritage site.

In an Interim Comment issued on the 24/08/2018, SAHRA requested that a map be provided showing the location of the development i.e. the chairlift pylon footings, in relation to the identified heritage sites, as well as a tracklog of the areas surveyed.

SAHRA also noted that no further assessment of palaeontological resources is required. The same development area was assessed in SAHRIS Case ID 12431 by a qualified palaeontologist and the conclusion in that report was that no further assessment was required.

Since the issuing of the Interim Comment, the requested map has been uploaded.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit does not have any objections to the proposed Sun City Chairlift Project and accepts the recommendations by the heritage specialist. The recommendations provided in the report and the following conditions must be included in the EMP and the EA:

- The southern alternative for the hiking route is the preferred alternative from a heritage perspective as there will be less of an impact to identified heritage sites;
- Should the Environmental Authorisation be granted for this project, the HSMP for *Itlholanoga* must be developed and submitted to SAHRA prior to construction;
- A no-go buffer zone of 100 m must be maintained around *Itlholanoga* and this must be reflected in the pending HSMP;
- Reports detailing the results of the Watching Brief must be submitted to SAHRA once the monitoring

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has been completed;

- 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. 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; and
- Should the project be granted Environmental Authorisation, SAHRA must be notified and all relevant documents submitted to the case file.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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/510025>

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.