

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 12749

Date: Friday August 24, 2018
Page No: 1

Interim Comment

In terms of Section 38(3), 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 assessed further. A recommendation and Request for Exemption from further palaeontological studies is made



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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 grading 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 achieved.

A Heritage Sensitivity Mapping Report was conducted for proposed holiday units which informed the decision

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Page No: 3

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.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests 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.

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.

Further comments will be issued upon receipt of the above.

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

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Page No: 4

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/510025>