

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: Phillip Hine
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CaseID: 16380

Date: Friday May 28, 2021
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Interim Comment

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

Attention: Anderbridge Investments (Pty) Ltd

Environmental Consultants International (Pty) Ltd (ECI) was appointed by Anderbridge Investments (Pty) Ltd (Proponent) as Environmental Assessment Practitioner (EAP) for the development of a tourism facility on Portion 58 of the Farm Kromdraai 520 JQ in the Cradle of Humankind, Mogale City Local Municipality, Gauteng.

Anderbridge Investments (Pty) Ltd proposes the development of a tourism facility on Portion 58 of the Farm Kromdraai 520 JQ in the Cradle of Humankind, Mogale City Local Municipality, Gauteng. The development will consist of a hotel, an ashram sanctuary, a healing centre and a farming component with a total footprint of 8.16 hectares. The development is located within the core area of the Cradle of Humankind World Heritage Site (COHWHS) and in close proximity to Kromdraai and Sterkfontein National Heritage Sites. A Draft Basic Assessment Report and a Heritage Impact Assessment were submitted in support of this application. The individual components of the development consist of the following infrastructure:

- Six (6) 275 m² residential villas;
- Sixteen (16) 175 m² residential villas;
- Eighteen (18) 65 m² residential suites;
- Nineteen (19) 40 m² residential rooms;
- Six (6) 10 m² residential pods;
- 200 m² wellbeing facility (incl. hydrotherapy, treatments rooms, and a gym);
- 600 m² 23-room residency;
- 550 m² lounge/event space;
- 200 m² restaurant, and
- 520 m² central facilities.

The field-based heritage impact assessment (HIA) did not identify any surface archaeological material or palaeontological specimens. However, a disused farmhouse was identified as well as a cemetery. The report does not indicate the age of the graves and if it triggers the provisions of section 36 of the NHRA. The

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farmhouse is considered to be younger than 60 years of age according to the author of the specialist report. The following site-specific recommendations were provided by the specialist for implementation:

- *An accidental fossil find protocol be drafted and endorsed by the responsible official/s at Maropeng;*
- *Construction project manager and workers are sufficiently briefed to identify fossils and to report accidental findings immediately to the Environmental Control Officer (ECO);*
- *Individual grave and cemetery must be fenced and maintained;*
- *Other than the above there are no visible restrictions or negative impacts in terms of heritage associated with the site;*
- *In terms of heritage the proposed project may continue; and*
- *The discovery of subsurface archaeological and/or historical material, as well as graves, must be taken into account in the Environmental Management Programme.*

Interim Comment:

In order for SAHRA to provide a Final Comment in terms of section 38 (4) of the NHRA the HIA submitted must be supplemented with the following information:

- Due to the heritage sensitivity and its location within the core of the WHS it is likely that archaeological and palaeontological material will be found during excavations and trenching. The chance fossil find procedure must include a detailed monitoring plan. Monitoring must be undertaken by an experienced archaeologist/palaeontologist familiar with the fossil and archaeological heritage of the area;
- The development is situated in an area of high to moderate palaeontological sensitivity. A field-based palaeontological assessment will be required and submitted to SAHRA for comment (<https://sahris.sahra.org.za/map/palaeo>)
- The Visual Impact Assessment (VIA) and Viewshed Analysis mentioned in the BAR must be submitted to SAHRA for comments. It is not possible for SAHRA to know at this stage if the VIA considered Kromdraai (Portion 5) and Sterkfontein (Portion 65 of Swartskrans 172 IQ) NHS as visual receptors. It is noted that the draft BAR indicated a low visual impact on adjacent properties and the R540 and R374;
- Further clarity must be provided on the age of the cemetery and the graves;
- SAHRA will provide a Final Comment on the case as on receipt of the requested information.

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

Yours faithfully

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/571932>
(DEA, Ref: 14/12/16/3/3/1/2325)