

# Proposed township establishment development of the Arts and Culture hub at Bakone Malapa Cultural Village

Our Ref: 17721



an agency of the  
Department of Arts and Culture

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CaseID: 17721

Date: Wednesday August 10, 2022

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## Interim Comment

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

Attention: Precious Environment Consultants

**The site is within the Bakone Malapa Northern Sotho Open Air Museum under Polokwane Local Municipality. The extent of the site is 105Ha. The proposed development includes a theatre development and operation that will introduce a modern interpretation of local vernacular architectural traditions and a boutique hotel with spa and wellness centre, restaurant and bar, conferencing facilities in the Limpopo Province.**

The municipality is proposing to construct an arts and culture hub township establishment that is 105ha in extent consisting of a mixed residential component (Res 1 and 2), Provincial State Theatre, Arena (Sporting Facilities), Film Studios and Film Archives or Music Studios/ General Studios, Workshop- Training Facility, Manufacturing Facilities, Retail- Incubator Building, Government Offices, Municipal Staff Housing, Cable Way, Hotel and Restaurant. The proposed hub is located near the Bokone cultural village and museum within the Bakone Malapa Northern Sotho Open Air site, on Remainder of Portion 7 of the Farm Palmietfontein 24-KS, Polokwane Local Municipality, of Limpopo Province.

Precious Environment (Pty) Ltd have been appointed to undertake an environmental assessment as part of the Basic Assessment process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations.

A Heritage Impact Assessment (HIA) by Vungadze cc was submitted to the South African Heritage Resources Agency (SAHRA) for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Mngomezulu, M. April 2021. Phase 1 Heritage Impact Assessment for the proposed Township Establishment Development of the Arts and Culture Hub at Bakone Malapa Cultural Village in Polokwane, Limpopo Province.*

The author along with Ms Stegmann undertook a field assessment of the proposed development and did not identify any heritage resources on site however, the development is adjacent to the existing Bakone Northern Sotho Open Air Site. This site consists of rock art sites, some stone walling and the rain making hill, all listed

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as being of provincial significance. The museum area (the open air site) has been designated as a no go area and the construction area is located about.

The author recommends the following:

A temporary fence must be erected around the open air site demarcated as a no-go zone.

The contractor should only work within the developing area and there must be a heritage specific induction programme so the construction crew knows the types of heritage resource that occur within the area and how to identify heritage artefacts uncovered during construction.

An Interim Comment was issued on 1/04/2022 requesting the HIA to be amended as the HIA did not fully assess the long term impacts to the Bokone Northern Sotho Open Air Site due to increased foot traffic. Also, the SAHRA requested a visual impact assessment, and a Heritage Management Plan. An addendum to the HIA report was submitted to the case on 20/05/2022.

*Mngomezulu, M. May 2022. Addendum to Phase 1 Heritage Impact Assessment for the proposed township establishment development of the Arts and Culture Hub at Bakone Malapa Cultural Village in Polokwane, Limpopo Province.*

The addendum stating that the proposed development plan has been amended to exclude the Bokone Malapa site from the overall development site. However the addendum does not include a VIA and Heritage Management Plan.

## Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the submission of the addendum to the HIA report however, the addendum does not address the outstanding information that was requested in the Interim Comment and the SAHRA is unable to provide comments on the information provided. The SAHRA comments issued in the Interim Comment 1/04/2022 still stand as follows:

*The HIA must be amended to contain cannot provide comment on this development without the following additional information added to the heritage assessment:*

*Detailed photographs and description (ie size extent and type of heritage) of each heritage site located within the development footprint must be submitted.*

*An assessment of impacts to each site must be provided as well as impacts to the sense of place of the*

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*general area by the proposed development. The impact assessment must include the distance of each site to the proposed development activities.*

*The proposed development layout plan must be overlain on the google earth map provided showing its relation to the no-go area and the known heritage resource in the no go area as well as recently identified sites that may be in the construction area must be marked on the map.*

*The SAHRA cannot provide comment on this development without the following additional information:*

*The HIA must also include a management plan for long term impacts to the open air site and the rock art. The HMP must address management of access due to the increase in foot traffic to the area due to the development.*

*It is not clear if there is an existing heritage management plan for the Bokone Northern Sotho Open Air Site and the rock art sites. If there is then it should be assessed and the HIA must address the needs and desirability of the development as part of the long term planning that was identified within the HMP and whether this development is for the benefit of the long term conservation of the rock art sites and stone walling.*

*In addition there must be a visual impact assessment conducted by a suitably qualified professional with background in history, landscape architecture and the regional vernacular architecture to assess visual impacts of the current development to the existing heritage sites, if the development will impact on the sense of place of the heritage sites, and if the types of structures being proposed are sensitive to cultural sense of place of the development.*

*It should be noted that the NHRA aims to conserve all values of heritage and the HIA should aim to embody this spirit of conservation by the consideration of the greater area and assessing if the types of heritage found in this study, and assessed as being significant within this area, is well conserved in the region.*

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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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/590510>  
(LDEDET, Ref: 12/1/9/2-C73 LIM/EIA/0001374/2021)