



Interim Comment

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

Attention: Mr Tom Pillay
Samy's Wholesalers
78/84 Transvaal Road
Kimberley North
8300

Proposed expansion of warehouses for Samy's wholesalers, corner of Quinn and Lawrence Streets, Sol Plaatjie Municipality, Northern Cape.

Gaigher, S. November 2014. Heritage Impact Assessment report for the proposed expansion to the Samy's Warehouse, Kimberley - Northern Cape Province.

P & V. Pillay Family Trust proposes the construction of a new warehouse on Erf 44500 in Kimberley. The property is considered to be sensitive due to the location of an informal cemetery dated to the 1870s. The extent of the cemetery is not well understood since there are no remaining markers above ground that would allude to the presence of the cemetery.

It is understood that construction work has commenced for the proposed warehouse and that the Northern Cape Provincial Heritage Authority (Ngwao-Boswa) issued a cease works order on the construction activities pending the completion and results of a Heritage Impact Assessment.

A heritage assessment was undertaken by G&A Heritage Management Consultants. It should be noted that the heritage assessment was emailed to SAHRA after a cease works order was issued on the developer. The cease works order is dated 16 October 2014, whereas approval for the development was granted on 6 November 2014, by the Sol Plaatje municipality.

The heritage assessment emailed to SAHRA for decision making purposes is not adequate for SAHRA to make an informed decision regarding the proposed development:

1. The Stone Age and Iron Age sequence of the area is not relevant to the proposed activities and contains factual errors. This is because the proposed development is located in a well developed area. Significant Stone Age and Iron Age resources are not expected in the area proposed for development.
2. There is no engagement or interrogation of previous work done in the area. It is mentioned that Morris (2004) undertook social consultation and grave relocation, but no further information is provided.
3. The maps that are provided in the report are not good enough. There are no historical maps; the earliest map in the report dates to the 1940s.
4. The author concludes that there could be hundreds of graves on the property and also concludes that there are no significant heritage resources. This information is contradictory.
5. Letters of support for the development is provided as an addendum. There is no context to these letters and





does not constitute social consultation.

Consequently, SAHRA at this stage can not come to an informed decision regarding the proposed activities based on the heritage report submitted. It is therefore required that a new heritage report should be commissioned that would focus on the impact of the warehouse extension on the historical cemetery. The significance of the area should be properly assessed. It is likely that intensive social consultation will have to be done as part of the new heritage assessment. The new Heritage Impact Assessment should comply with SAHRA minimum standards for impact assessments.

SAHRA will only come to an informed decision once this new assessment has been submitted. Construction activities should not proceed until such time SAHRA has had time to review the new assessment.

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
Heritage Officer

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/183625>

