

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: 16380

Date: Friday September 03, 2021  
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## Interim Comment

**In terms of Section 38(3) 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 m<sup>2</sup> residential villas;
- Sixteen (16) 175 m<sup>2</sup> residential villas;
- Eighteen (18) 65 m<sup>2</sup> residential suites;
- Nineteen (19) 40 m<sup>2</sup> residential rooms;
- Six (6) 10 m<sup>2</sup> residential pods;
- 200 m<sup>2</sup> wellbeing facility (incl. hydrotherapy, treatments rooms, and a gym);
- 600 m<sup>2</sup> 23-room residency;
- 550 m<sup>2</sup> lounge/event space;
- 200 m<sup>2</sup> restaurant, and
- 520 m<sup>2</sup> central facilities.



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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 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.*

In an interim comment issued on 28/05/2021 the SAHRA stated that in order 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



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( <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.

Since the issuing of the interim comment on 28/05/2021 an updated Heritage Impact Assessment (HIA) and Field-based Palaeontological Impact Assessment (PIA) have been submitted to the SAHRIS case application for commenting and review by SAHRA.

Environmental Consultants International, Leonie Marais, and Dr. Fourie, H., have appointed to provide the heritage specialist reports as part of the EA process as required in terms of section 24(4)b(iii) of NEMA and in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Marais, L. March 2021. Phase 1 Heritage Impact Assessment (HIA) The Proposed Project Fifty-Eight on Portion 58 of the Farm Kromdraai 520 JQ, Gauteng Province.*

The updated HIA study confirms that the identified Burial Ground and Graves are older than 60 years.

*Fourie, H. June 2021. The Proposed Project Fifty-Eight on Portion 58 of the Farm Kromdraai 520 JG Mogale City Local Municipality, West Rand District Municipality, Gauteng Province: Palaeontological Impact Assessment Phase 1.*

The study area is underlain by the Kameeldoorns formation, Black Reef Formation and the Malmani Dolomites which are known to preserve stromatolites. Dolomite was observed at a stream present in the study area and the crop area, and no fossils were observed.

The following recommendation are made:

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- The protocol for Chance Finds and Management Plan is recommended and attached to the report.
- It is recommended that a plio-pleistocene palaeoanthropologist monitors the site during excavations.
- The ECO must survey for fossils before and/or after clearing, blasting, drilling or excavation.
- The ECO must familiarise him or herself with the formation present and fossils and receive pre-construction training.
- Care must be taken during dolomite risk assessment as stromatolites may be present.

The following studies and clarity as previously requested have not been submitted along with the updated HIA and Field-based PIA to SAHRA for review and commenting:

- 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.

## Interim Comment

The SAHRA acknowledges receipt of the updated HIA archaeological component and the Field-based PIA. However, SAHRA has noted that not all requested studies as per interim comment issued on 28/05/2021 have been submitted. Therefore, the outstanding studies are requested in terms of section 38(3) of the NHRA (25 of 1999). The applicant is also advised to revise the BAR to include results of heritage studies.

Further comments will be issued upon receipt of the above. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations in order to comply with this comment.

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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Phillip Hine  
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South African Heritage Resources Agency

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**ADMIN:**

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