



DIGBY WELLS  
ENVIRONMENTAL



---

## The Sun City Resort Complex Heritage Conservation Management Plan Project 2019 - 2024

### Heritage Conservation Management Plan

---

**Project Number:**

SUN4642

**Prepared for:**

Sun International

June 2019

---

Digby Wells and Associates (South Africa) (Pty) Ltd  
Co. Reg. No. 2010/008577/07. Turnberry Office Park, 48 Grosvenor Road, Bryanston, 2191. Private Bag  
X10046, Randburg, 2125, South Africa  
Tel: +27 11 789 9495, Fax: +27 11 069 6801, info@digbywells.com, www.digbywells.com

---


Directors: GE Trusler (C.E.O), LF Stevens, J Leaver (Chairman)\*, NA Mehlomakulu\*, DJ Otto  
\*Non-Executive

---



This document has been prepared by Digby Wells Environmental.

<b>Report Type:</b>	<b>Heritage Conservation Management Plan</b>
<b>Project Name:</b>	<b>The Sun City Resort Complex Heritage Conservation Management Plan Project 2019 - 2024</b>
<b>Project Code:</b>	<b>SUN4642</b>

<b>Name</b>	<b>Responsibility</b>	<b>Signature</b>	<b>Date</b>
Justin du Piesanie Divisional Manager: SHS ASAPA Member 270 ICOMOS Member IAIASa Member	Compilation		June 2019

**Revision history:**

<b>Revision No.</b>	<b>Revision Details</b>	<b>Date</b>	<b>Reviewer</b>
1.	Draft compilation review	May 2019	Shelley Lizzio
2.	Draft compilation review	May 2019	Daniel Boshoff

*This report is provided solely for the purposes set out in it and may not, in whole or in part, be used for any other purpose without Digby Wells Environmental prior written consent.*

## ACRONYMS

<b>BID</b>	Background Information Document
<b>BPDM</b>	Bojanala Platinum District Municipality
<b>C&amp;SE</b>	Community and Stakeholder Engagement
<b>CFP</b>	Chance Find Protocol
<b>CMP</b>	Conservation Management Plan
<b>CRR</b>	Comments and Response Report
<b>CS</b>	Cultural Significance
<b>DAC</b>	Department of Arts and Culture
<b>Digby Wells</b>	Digby Wells Environmental
<b>EIA</b>	Environmental Impact Assessment
<b>EMP</b>	Environmental Management Plan
<b>FGM</b>	Focus Group Meeting
<b>HIA</b>	Heritage Impact Assessment
<b>HRA</b>	Heritage Resources Authority
<b>I&amp;APs</b>	Interested and Affected Parties
<b>IAP2</b>	International Association of Public Participation
<b>MKLM</b>	Moses Kotane Local Municipality
<b>NEMA</b>	National Environmental Management Act, 1998 (Act No. 107 of 1998)
<b>NHRA</b>	National Heritage Resources Act, 1999 (Act No. 25 of 1999)
<b>NW-PHRA</b>	North West Provincial Heritage Resources Authority
<b>PPP</b>	Public Participation Process
<b>READ</b>	Department of Rural, Environment and Agricultural Development
<b>SAHRA</b>	South African Heritage Resources Agency
<b>SAHRIS</b>	South African Heritage Resources Information System
<b>SED</b>	Socio-Economic Development
<b>SEP</b>	Stakeholder Engagement Process
<b>STP</b>	Shovel Test Pit
<b>Sun City Resort Complex</b>	Sun City
<b>Sun International (Pty) Ltd</b>	Sun International
<b>SWOT</b>	Strengths, Weaknesses, Opportunities & Threats Analysis

## TABLE OF CONTENTS

1	Introduction .....	1
1.1	Document Objectives .....	1
1.2	Purpose.....	1
1.3	Scope.....	2
1.4	Process Principles.....	2
2	Stakeholders .....	3
2.1	Public Participation.....	3
2.1.1	<i>Objectives</i> .....	3
2.1.2	<i>Summary of the PPP</i> .....	4
2.2	Stakeholder Engagement Process .....	5
2.2.1	<i>Objectives</i> .....	7
2.2.2	<i>Summary of the SEP</i> .....	7
3	Site Definition .....	8
3.1	Description and Significance .....	8
3.1.1	<i>Descriptions</i> .....	8
3.1.2	<i>Evaluation of Cultural Significance</i> .....	8
3.2	Delimitations.....	10
3.3	Access .....	16
4	Management Structures.....	17
4.1	Ownership .....	17
4.2	Legal Status of Entities.....	18
4.3	Competencies and Responsibilities .....	19
4.4	Coordination Mechanisms between Entities .....	19
5	Principles for Planning and Action .....	19
5.1	Situational Analysis .....	19
5.2	Guiding Principles .....	22
5.3	Objectives, Targets and Strategies.....	22
5.4	Masterplan of Action.....	26

6	Preservation Mechanisms.....	26
6.1	Current and Future Risks .....	27
6.2	Preventative Protection .....	28
6.3	Monitoring .....	31
6.3.1	<i>Construction Phase</i> .....	31
6.3.2	<i>Operational Phase</i> .....	32
6.4	Progress Reporting .....	32
7	Awareness .....	33
7.1	Public Awareness.....	33
7.2	Contractor Awareness.....	34
8	Resources.....	35
9	Sustainable Use and Vision for the Future.....	35
9.1	Vision for 2024 .....	36
9.1.1	<i>Research and Knowledge Acquisition</i> .....	36
9.1.2	<i>Sustainable Tourism and Cultural Affinity</i> .....	37

## LIST OF FIGURES

Figure 3-1:	Local Setting of Sun City.....	12
Figure 3-2:	Identified Heritage Resources within Sun City.....	13
Figure 3-3:	LiDAR Delimitation of Primary Stonewalled Settlements .....	14
Figure 3-4:	Delimitation of Primary Stonewalled Settlement combined Trimble and LiDAR data .....	15
Figure 3-5:	Access Route to Sun City .....	16
Figure 3-6:	Access Routes to Primary Stonewalled Settlements .....	17
Figure 5-1:	Current Masterplan of Action.....	26

## LIST OF TABLES

Table 2-1:	Public Participation Activities.....	4
------------	--------------------------------------	---

---

Table 2-2: Identified Key Stakeholders.....	6
Table 2-3: Summary of SEP Activities.....	7
Table 3-1: Broad Value Categories to Inform CS .....	9
Table 3-2: Summary of the CS Assessment of the Identified Heritage Resources .....	10
Table 3-3: Project Location Details.....	11
Table 4-1: Details of the Land Owner .....	18
Table 4-2: Legal Status of Entities.....	18
Table 5-1: SWOT Analysis.....	21
Table 5-2: Objective 1, Targets and Strategies .....	23
Table 5-3: Objective 2, Targets and Strategies .....	25
Table 6-1: Identified Current and Future Risks .....	27
Table 6-2: Identified Future Risks (Case ID: 12749).....	27
Table 6-3: Identified Future Risks (Case ID: 12431).....	28
Table 6-4: Preventative Protection as Relevant to Possible Future Risks.....	29
Table 6-5: General Preventative Protection Measures .....	30
Table 6-6: Construction Phase Monitoring .....	31
Table 6-7: Operational Phase Monitoring .....	32
Table 7-1: Approach to Creating Awareness .....	33
Table 9-1: Proposed Action Plan 2019 - 2024.....	36
Table 9-2: Proposed Action Plan 2019 - 2024.....	37

## **LIST OF APPENDICES**

Appendix A: Chance Find Protocol

Appendix B: Recording Form

## 1 Introduction

Sun International (Pty) Ltd (hereinafter Sun International) proposes to undertake several future developments (the Project) within the Sun City Resort Complex (Sun City) located near Rustenburg, in the North West Province. These developments include:

- Resort expansion projects;
- Utilities and services projects; and
- Maintenance projects.

To comply with the requirements stipulated by the South African Heritage Resources Agency (SAHRA) on Case ID: 12749<sup>1</sup> and 12431<sup>2</sup> and the national South African legislative framework, Digby Wells Environmental (hereinafter Digby Wells) on behalf of Sun International developed this Heritage Conservation Management Plan (CMP).

### 1.1 Document Objectives

The primary objective of this document is to define the management requirements for the retention and enhancement of the Cultural Significance (CS) of the cultural heritage resources within Sun City.

The identified management and mitigation measures must aim to achieve international best practice standards and thereby avoid/remove/reduce risk to cultural heritage resources, Sun City and Sun International.

### 1.2 Purpose

The purpose of the Heritage CMP is to:

- Recognise the cultural heritage of the landscape within which Sun City is situated;
- Collate all relevant information into a single management document that details:
  - The defined CS of the heritage resources;
  - The associated sensitivities of known heritage resources;
  - Proactive risk management in the context of the Project;
  - Management and mitigation requirements in the context of risks and/or manifested impacts; and
- Present the tools for implementation of the Heritage CMP and ultimately the retention or enhancement of the CS, integrity and authenticity of the various heritage resources.

---

<sup>1</sup> Available at <https://sahris.sahra.org.za/cases/sun4270-sun-city-environmental-authorisation>

<sup>2</sup> Available at <https://sahris.sahra.org.za/cases/sun4642-sun-city-developments>

## 1.3 Scope

To detail:

- The consultation process undertaken in the development of the Heritage CMP;
- A description of the various heritage resources and sites within Sun City, and the determined CS of these;
- The delimitations of the heritage resources applicable to the Heritage CMP;
- The relevant management structures appointed to implement the requirements encapsulated in the Heritage CMP;
- The principles for planning and action;
- Applicable preservation mechanisms that consider current and future risks;
- Possible awareness requirements and initiatives; and
- Possible sustainable uses of the heritage resources and a vision for the future.

The scope applies to all employees of Sun City, Sun International, other affiliated entities, service providers and business partners to the Project.

## 1.4 Process Principles

The national South African regulatory framework and international best practice standards informed the principles of this document. The SAHRA Site Management Plans: Guidelines for the Development of Plans for the Management of Heritage Sites or Places (2006) and draft Development Heritage Management Plan Guidelines for Archaeological, Palaeontological and Meteorites Heritage Resources (2017) form the basis of the process. General principles include *inter alia*:

- The general principles for heritage resource management as encapsulated within Section 5<sup>3</sup> of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) and must be considered during the compilation of the Heritage CMP;
- Proposed management measures must be realistic and commensurate to the nature of the Project, and community;

---

<sup>3</sup> (1)(a) Heritage resources have lasting value in their own right and provide evidence of the origins of South African society and as they are valuable, finite, non-renewable and irreplaceable they must be carefully managed to ensure their survival;

(1)(b) Every generation has a moral responsibility to act as trustee of the national heritage for succeeding generations and the State has an obligation to manage heritage resources in the interests of all South Africans;

(1)(c) Heritage resources have the capacity to promote reconciliation, understanding and respect, and contribute to the development of a unifying South African identity; and

(1)(d) Heritage resources management must guard against the use of heritage for sectarian purposes or political gain.



- The Heritage CMP must be clear, written in simple language and not unduly complex;
- The Heritage CMP must promote co-operative governance and stakeholder engagement;
- The relevant Heritage Resource Authorities (HRAs), in this instance SAHRA and the North West Provincial Heritage Resources Authority (NW-PHRA) must guide the development of the Heritage CMP and endorse it once finalised.

## 2 Stakeholders

### Guidance Note

Stakeholders inform the development of conservation management plans. Management plans must detail who was involved in its development, and the reasoning behind the inclusion of these individuals or entities. It should further describe the manner in which the stakeholder participation was undertaken.

Heritage resources do not occur in isolation from heritage producers or consumers. A pivotal component of the Heritage CMP development is an effective, integrated engagement process to:

- Identify, acknowledge, and analyse the needs, wants and expectations of stakeholders;
- Facilitate two-way communication streams between all stakeholders that promotes inclusive, participatory decision-making processes; and
- Manage risks and conflicts that may manifest.

Digby Wells completed two processes in support of the Heritage CMP Development. These comprised a Public Participation Process (PPP) as required for the Environmental Authorisation for the Project, and a Stakeholder Engagement Process (SEP) specifically in support of the Heritage CMP development. These two separate processes are briefly summarised in the subsequent sections.

### 2.1 Public Participation

Digby Wells initiated a PPP prior to the commencement of the Environmental Impact Assessment (EIA) Process for the Project. The PPP adhered to legislative requirements, as well as the principles embodied by the International Association of Public Participation (IAP2).

#### 2.1.1 Objectives

The objectives of the PPP were founded on the principles encapsulated within the aforementioned regulatory framework. In the context of this Project, the primary objectives of the PPP were to:

- Ensure distribution of Project information as widely as possible to afford all Interested and Affected Parties (I&APs) an opportunity to participate;

- Record all comments received from I&APs to ensure informed decision-making that highlights the concerns and opinions of the surrounding communities;
- Provide I&APs with the opportunity to verify that their specific inputs have been accurately recorded, addressed and where applicable, considered; and
- Comply with the South African regulatory requirements.

### 2.1.2 Summary of the PPP

**Table 2-1: Public Participation Activities**

Activity	Details
<i>Announcement and Scoping Phase</i>	
Stakeholders Identification	Digby Wells utilised an existing stakeholder database of I&APs from various sectors of society, including directly affected and adjacent landowners, in and around Sun City.
Announcement Letter and Background Information Document (BID) Distribution	Digby Wells distributed an announcement letter with Registration and Comment Form to I&APs from the existing database on 12 July 2018.
Newspaper Advertisement	Concurrent to the distribution of the announcement letter and BID, an English advertisement announcing the Project was placed in the Rustenburg Herald Newspaper on 12 July 2019. Digby Wells registered any additional I&APs expressing interest in the Project.
Site Notice Placement	Concurrent to the distribution of the announcement letter and BID, English site notices announcing the Project were placed at Sun City and other strategic public places around the Project on 12 July 2019. Digby Wells registered any additional I&APs expressing interest in the Project.
Scoping Report Distribution	Concurrent to the announcement of the Project on 12 July 2018, Digby Wells distributed the Draft Scoping Report for a 30-day commenting period ending 14 August 2018. Digby Wells sent a short-message-service (SMS) and emailed the copies of the report to registered I&APs and placed hard-copies at: <ul style="list-style-type: none"> <li>■ Sun Central; and</li> <li>■ Bakubung Tribal Hall.</li> </ul> The Scoping Report was also available on <a href="http://www.digbywells.com">www.digbywells.com</a>
Public Meeting	Digby Wells hosted a public meeting at Cornerstone Academy Primary School (South Village, Sun City, 0316) on 18 July 2018 from 11:00 am – 13:00 pm to introduce the Project. Copies of the draft Scoping Report were available at the meeting.

Activity	Details
I&APs Comments	Digby Wells captured all I&APs comments received during the commenting period into the Final Scoping Report. The final Scoping Report was submitted to the North-West Province Department of Rural, Environment and Agricultural Development (READ) for consideration.
<i>Impact Assessment Phase</i>	
Draft EIA and Environmental Management Plan (EMP) Reports Announcement	Digby Wells announced the Draft EIA and EMP Reports availability via email and SMS to I&APs on 27 November 2018 for a commenting period ending 18 January 2019. The Draft EIA and EMP Reports were available at: <ul style="list-style-type: none"> <li>▪ Sun Central; and</li> <li>▪ Bakubung Tribal Hall.</li> </ul> The Draft EIA and EMP Report was also made available on <a href="http://www.digbywells.com">www.digbywells.com</a>
I&APs Comments	Digby Wells captured all I&APs comments received during the commenting period for the draft EIA and EMP into the Comments and Response Report (CCR) during the EIA Phase.
Final EIA and EMP Report Announcement	Digby Wells informed all I&APs via SMS and email on 23 January 2019 of the availability of the Final EIA and EMP Report. The EIA and EMP Report was also available on <a href="http://www.digbywells.com">www.digbywells.com</a> for I&APs to confirm their comments were included and responded too.

## 2.2 Stakeholder Engagement Process

Stakeholders in the development of the Heritage CMP comprise of both internal and external parties, selected for their ability to inform the decision-making process. In this instance, Sun International are not only internal but also the primary stakeholders accountable for all decisions and activities within the site-specific study area<sup>4</sup>. Other applicable stakeholder categories include:

- Core Stakeholders;
- Authorities; and
- I&APs.

Identified key stakeholders considered in the SEP are presented in Table 2-2.

<sup>4</sup> Refer to Chapter 3 for detailed site definition and delimitations

**Table 2-2: Identified Key Stakeholders**

Stakeholder Group		Stakeholder	Description
Internal	Primary	Sun International	Overall accountability for Sun City and components thereof. Final approval on decisions made through consultative process.
	Core	Digby Wells	Overall responsibility for the HRM process including the development of the Heritage CMP and the associated HRM specific consultation with stakeholders.
External	Core	baTlokwa ba Sedumedi	Traditional authority with vested interest in the cultural landscape. Must be informed and consulted in matters directly affecting their tangible and intangible heritage.
		baBakubung ba Ratheo	
	Authority	Moses Kotane Local Municipality (MKLM)	Local authority must be consulted on matters under their jurisdiction.
		Bojanala Platinum District Municipality (BPDM)	Provincial authority must be consulted on matters under their jurisdiction.
		NW-PHRA	Local authority responsible for the management of the historical built environment as contemplated under Section 2 (xiv) and 34 of the NHRA.
		SAHRA	National authority responsible for the management of heritage resources forming part of the national estate. Must be consulted on matters under their jurisdiction.
		Department of Arts and Culture (DAC)	National authority responsible for the management of heritage resources forming part of the national estate. Must be consulted on matters under their jurisdiction.
	I&APs	J. Pistorius	Stakeholders with a vested interest in the Project and/or components thereof.
		Mphebatho Cultural Museum	

## 2.2.1 Objectives

The objectives of the SEP were founded on the principles encapsulated within the aforementioned regulatory framework. In the context of this Project, the primary objectives of the SEP were to:

- Present and discuss with stakeholders all gathered data;
- Reach consensus on the determined CS of the cultural landscape;
- Identify key issues that must be considered in the development of the Heritage CMP;
- Conduct a situational analysis by way of “SWOT”;
- Define the guiding principles for planning and action; and
- Comply with the South African regulatory requirements.

## 2.2.2 Summary of the SEP

Table 2-3 provides a summary of the SEP activities.

**Table 2-3: Summary of SEP Activities**

Activity	Details
Invitations	Digby Wells distributed invitations to identified representatives from stakeholder groups as presented in Table 2-2 on 29 March 2019 to participate in the Heritage CMP development. This included a formal request for their participation in a Focus Group Meeting (FGM) at the Cornerstone Academy Primary School (South Village, Sun City, 0316) on 18 April 2019.
Focus Group Meeting	Focus Group Meetings were scheduled for: <ul style="list-style-type: none"> <li>■ 18 April 2019; and</li> <li>■ 10 June 2019.</li> </ul>
Information Distribution	Minutes of the information considered during the FGM, including the SWOT Analysis and presentation document was submitted to stakeholder representatives on 26 April 2019 for review and comment. The draft Heritage CMP document was distributed to stakeholder representatives on 29 May 2019 for review and comment.
Stakeholder Review	Input and comments received from stakeholder representatives were incorporated into the draft Heritage CMP for submission to the relevant heritage resource authorities.

## 3 Site Definition

### 3.1 Description and Significance

#### **Guidance Note**

Site descriptions and the ensuing discussions of CS drive the management of the heritage sites. Management plans must include clear descriptions to the character and extent of the site and define the CS built upon by verifiable sources, robust criteria and motivations.

#### 3.1.1 Descriptions

The site-specific study area is known to comprise tangible heritage resources from the Farming Community Period. Settlements and previous occupations are marked through archaeological material culture remains, the most visible of which are ceramics and stonewalling. Ceramics can help construct a relative cultural-historical sequence through time and space, which can aid in recognising ceramic users in the archaeological record (Huffman, 2007).

Stonewalling is the most visible and most easily identified indicator of previous occupations. Several types of stonewalling occur within southern Africa (Huffman, 2007). Within the greater study area, Type N and Molokwane are the most relevant stonewalling types.

#### 3.1.2 Evaluation of Cultural Significance

CS<sup>5</sup> was determined based on identified resources' importance or contribution to four broad value categories: aesthetic, historical, scientific and social values (Table 3-1). These categories summarised the CS and other values described in Section 3(3) of the NHRA. The resources' importance or contributions to these values were considered in terms of associative (qualitative) and/or rarity (quantitative) attributes, based on data collected through the HRM process. The integrity or condition of resources further influenced the CS. Integrity is largely determined based on resources' current, observed state of conservation, as well as notable changes made to it over the years.

Field ratings assist the responsible heritage resources authority to grade heritage resources into national (Grade I), provincial (Grade II) or local (Grade III) categories (Table 3-2) and are required under Chapter II Section 7(J) of the SAHRA Minimum Standards.

Field ratings considered the assigned CS and the level of official management required or the local competency of heritage authorities<sup>6</sup>.

---

<sup>5</sup> Cultural Significance is defined in the NHRA as the intrinsic "aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance" of a heritage resource. These attributes are combined and reduced to four themes used in the Digby Wells significance matrix: aesthetic, historical, scientific and social.

<sup>6</sup> Currently the NW-PHRA is only competent to manage and issue permits on NHRA Section 34 heritage resources, and no local (i.e. local government) competency exists within the province. All decisions relating to archaeology, palaeontology and burial grounds and graves therefore fall under the ambit of SAHRA.


**Table 3-1: Broad Value Categories to Inform CS**

Value Category	Attributes		NHRA Reference
Aesthetic	1.	Importance in aesthetic characteristics	S. 3(3)(e)
	2.	Degree of technical / creative skill at a particular period	S. 3(3)(f)
Historical	3.	Importance to a community or pattern in the country's history	S. 3(3)(a)
	4.	Site of significance relating to history of slavery	S. 3(3)(i)
	5.	Association with life or work of a person, group or organisation of importance in the history of the country	S. 3(3)(h)
Scientific	6.	Possession of uncommon, rare or endangered natural or cultural aspects	S. 3(3)(b)
	7.	The potential to yield information	S. 3(3)(c)
	8.	Importance in demonstrating principle characteristics	S. 3(3)(d)
Social	9.	Association to a community or cultural group for social, cultural or spiritual reasons	S. 3(3)(g)

**Table 3-2: Summary of the CS Assessment of the Identified Heritage Resources**

Resource ID	Description	Designation (Recommended Field Rating)	Recommended Mitigation based on SAHRA Minimum Standards (2007)
<i>Itlholanoga</i>	Stonewalled Settlements / Remnants	Very High (Grade II <sup>7</sup> )	Project design must change to avoid all change to resource; Conserved in entirety, CMP. The CMP should be completed in support of a Grade II Site Nomination
STW-002		Medium (Grade III A)	Mitigation of resource to include detailed recording and mapping, and limited sampling, e.g. Shovel Test Pits (STPs).
STW-003		Medium (Grade III B)	Mitigation of resource to include detailed recording and mapping, and limited sampling, e.g. STPs.
STW-004			
STW-005		Low (General Protection IV A)	Resource must be recorded before destruction, including detailed site mapping, surface sampling may be required
STW-001		Negligible (General Protection IV C)	Sufficiently recorded, no mitigation required.
STW-006			
STW-007			
STW-008			
STW-009			

### 3.2 Delimitations

#### Guidance Note

The precise position and delimitation of a site are important. They define where and to what extent actions and restrictions that are part of the management programme will be applicable and facilitated.

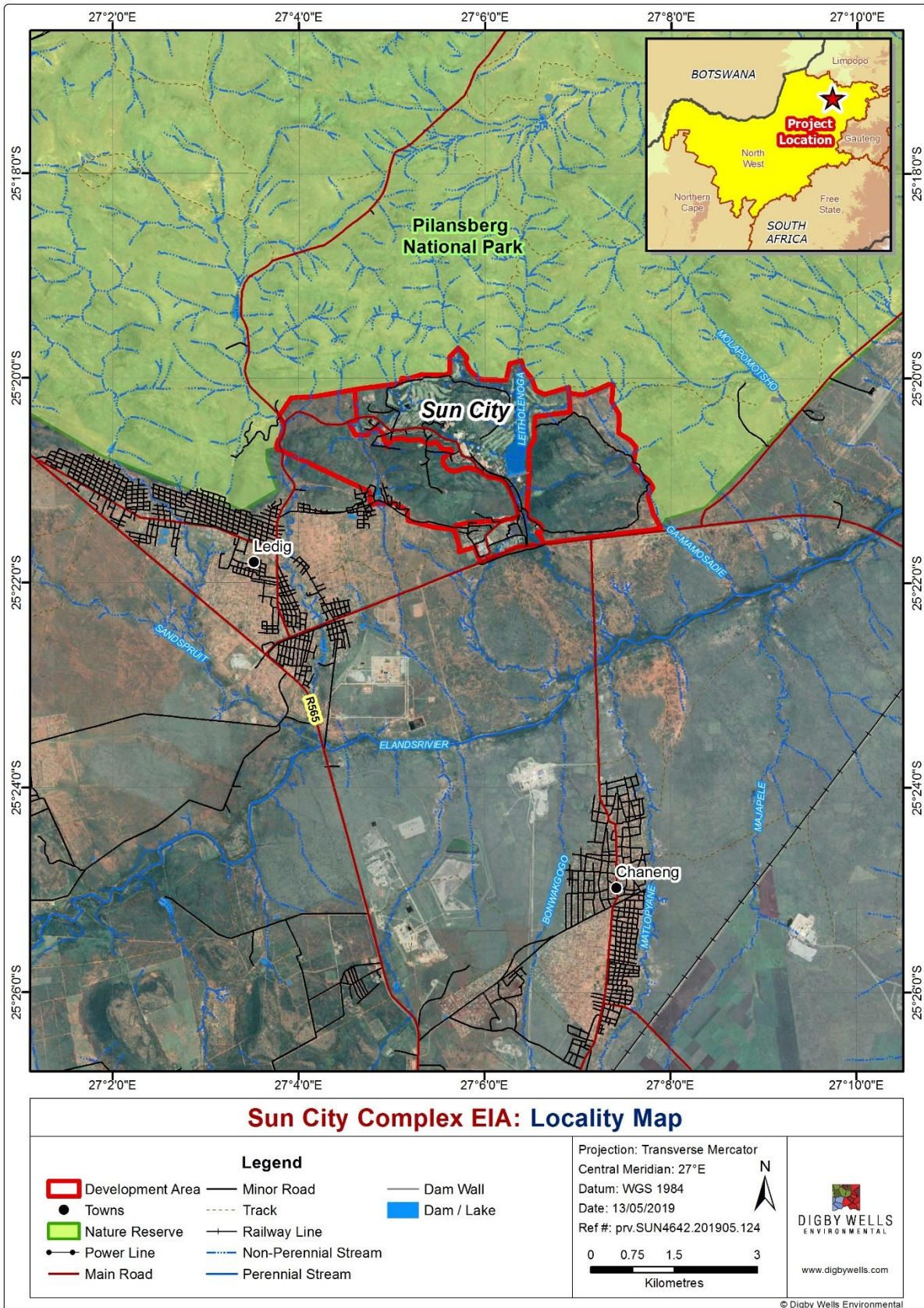
Sun City is in the North West Province, north of Rustenburg (Table 3-3). The Project area falls within the Moses Kotane Local Municipality (MKLM) within the Bojanala Platinum District Municipality (BPDM). The R556 borders Sun City in the south and the Pilanesberg borders Sun City to the north and east. The town of Ledig is located immediately south-west of Sun City.

<sup>7</sup> Notwithstanding that the NW-PHRA has not been assessed competent to manage NHRA Section 35 heritage resources, *Itlholanoga* should be considered as an important provincial heritage resource; the Grade II Field Rating therefore aims to highlight the importance of these resources and the required management thereof.



**Table 3-3: Project Location Details**

<b>Name of property</b>	Sun City Resort Complex
<b>Street address or location (e.g.: Off R44)</b>	Off the R556 regional road
<b>Erf or farm number/s</b>	Portion 7 of the farm Ledig 909 JQ Remaining Extent of Portion 1 of the farm Doornhoek 910 JQ
<b>Coordinates of approximate centre of project area</b>	25° 20' 56.936" S
	27° 05' 32.869" E
<b>Town or District</b>	Rustenburg (town)
<b>Responsible Municipality</b>	MKLM (within the BPDM)
<b>Extent of property</b>	Total area = 1400.472969 ha
<b>Current use</b>	Resort (entertainment destination / tourism)
<b>Predominant land use/s of surrounding properties</b>	Leisure and Residential Natural / Undisturbed



**Figure 3-1: Local Setting of Sun City**



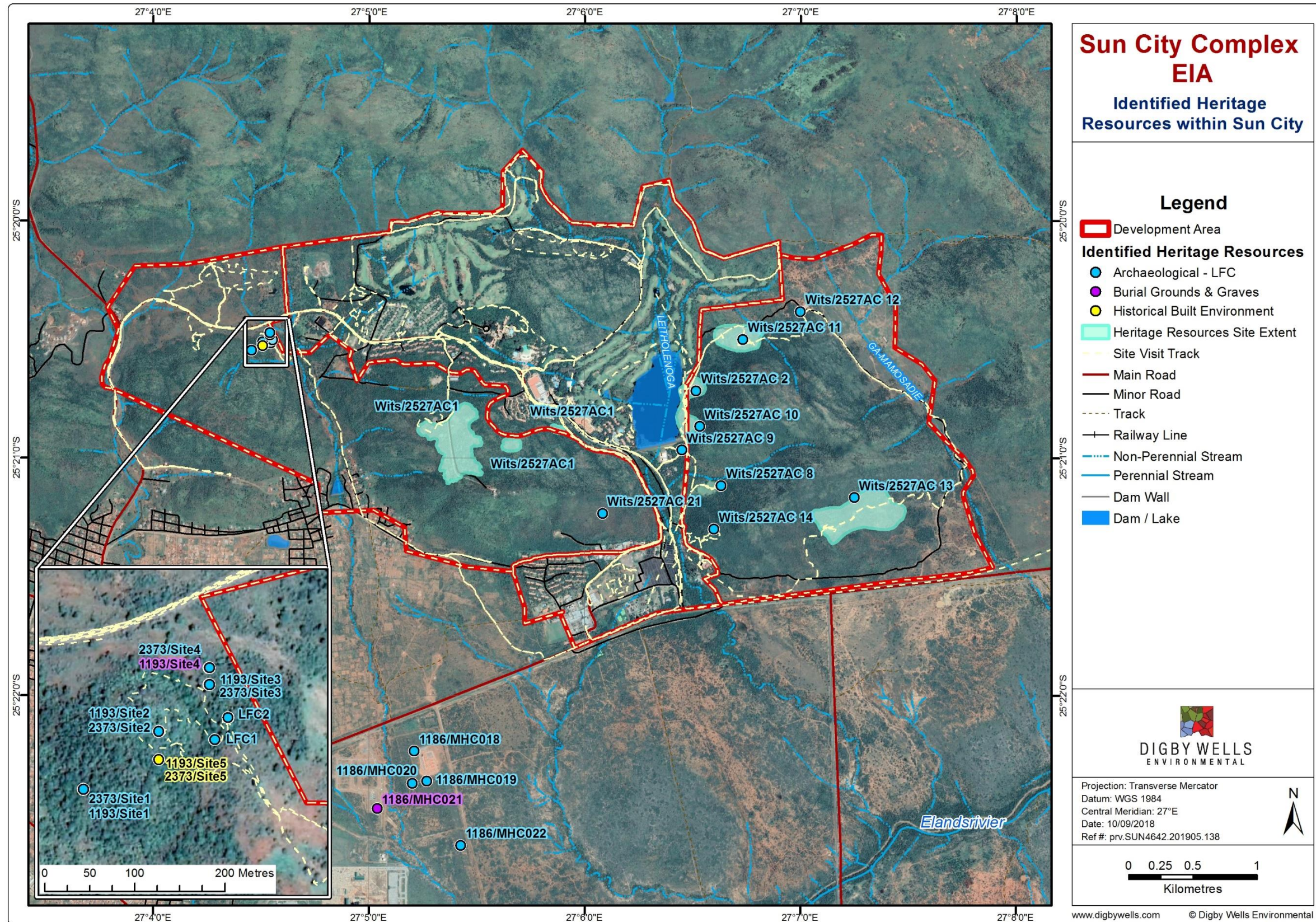


Figure 3-2: Identified Heritage Resources within Sun City



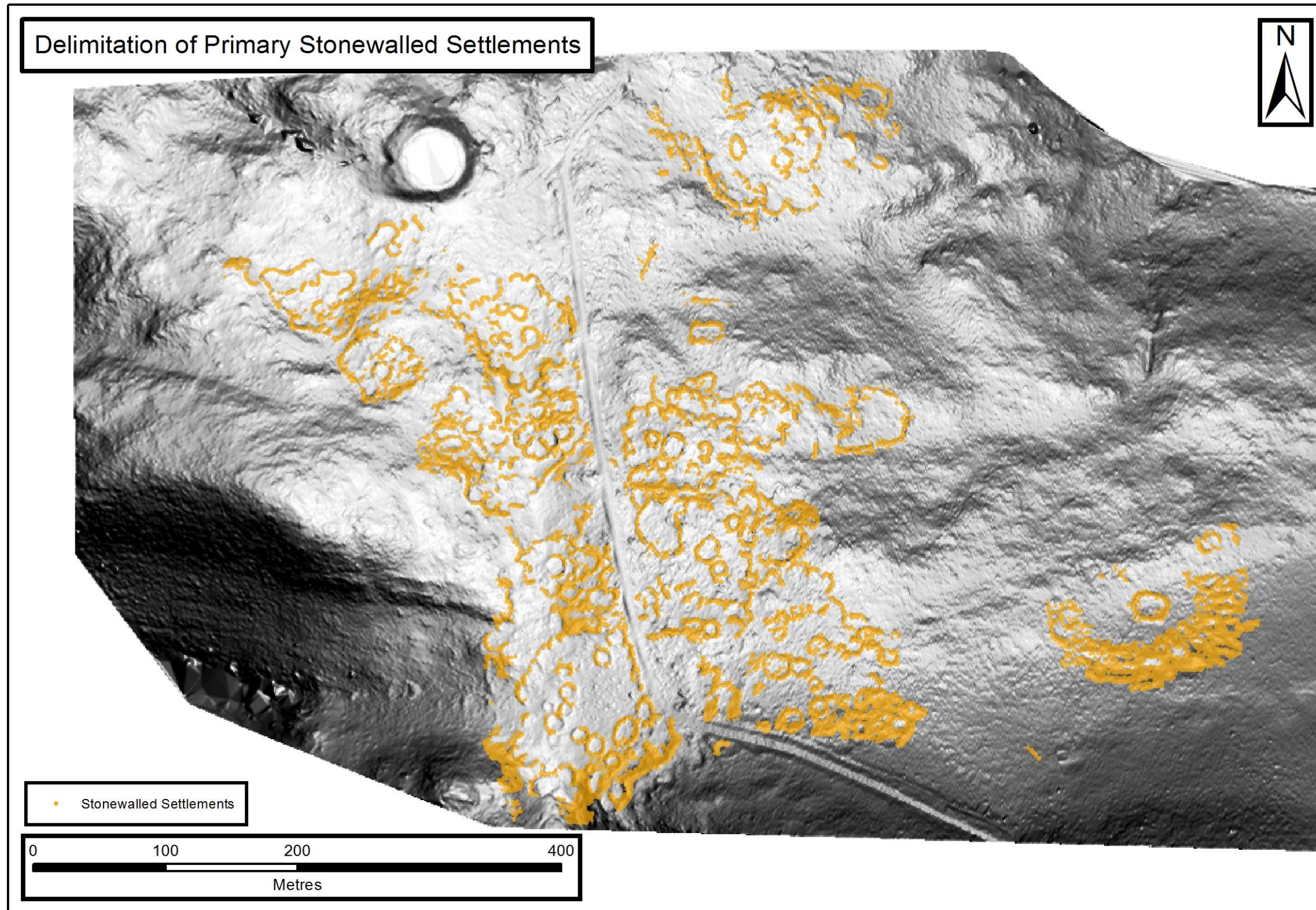


Figure 3-3: LiDAR Delimitation of Primary Stonewalled Settlements



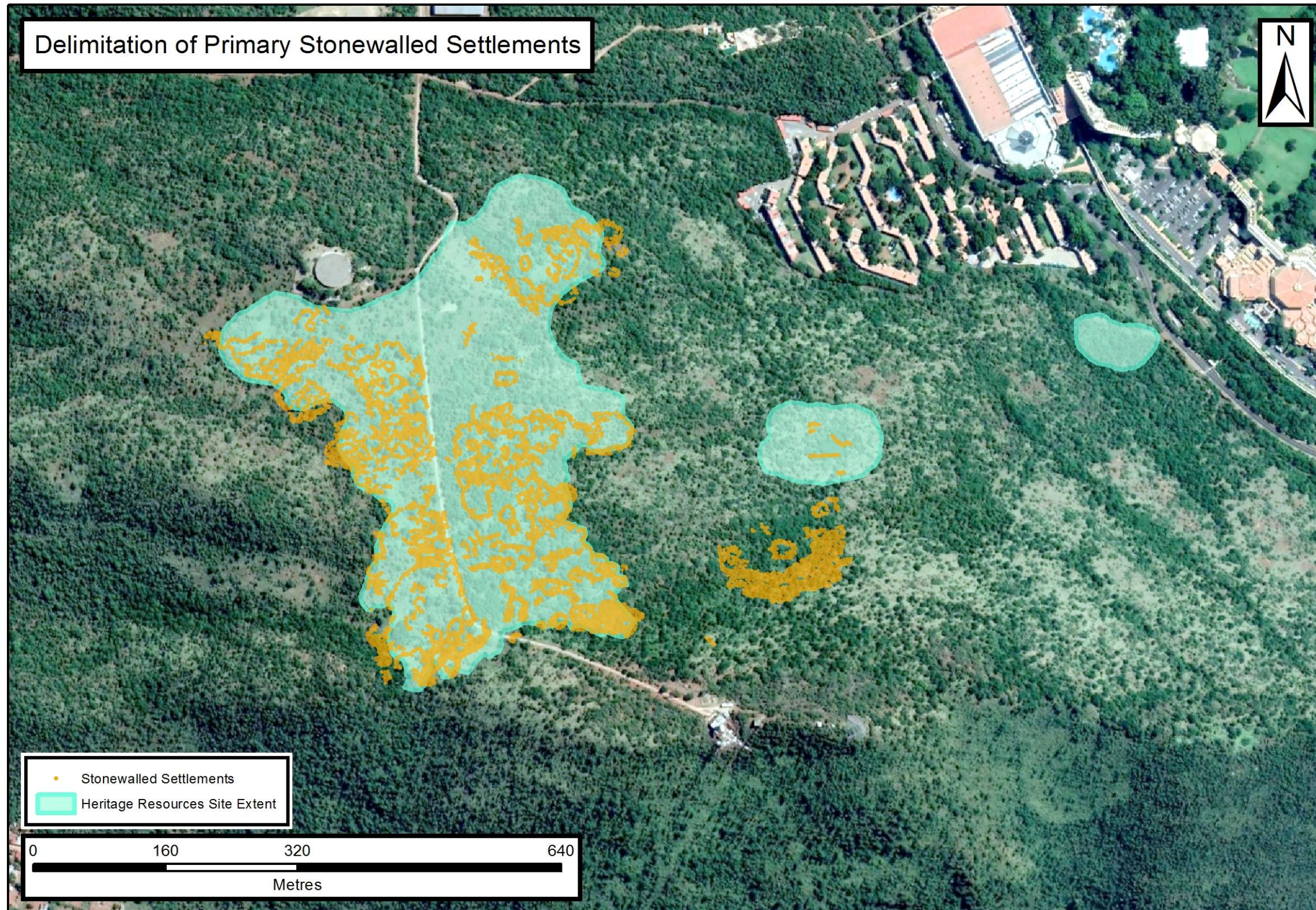


Figure 3-4: Delimitation of Primary Stonewalled Settlement combined Trimble and LiDAR data



### 3.3 Access

#### Guidance Note

Access relates to the free movement of proprietors and users of the heritage site or the restriction of movement to the heritage site to manage identified risks and liabilities. The management plan must be developed to facilitate access to the best benefit of society.

Sun City is serviced by a regional and private road network. Access to the complex is controlled, with the entrance located on the R556. The existing internal road network provides access to the identified heritage resources.

Presently access to the heritage resources is controlled to promote the preservation of the *status quo*.

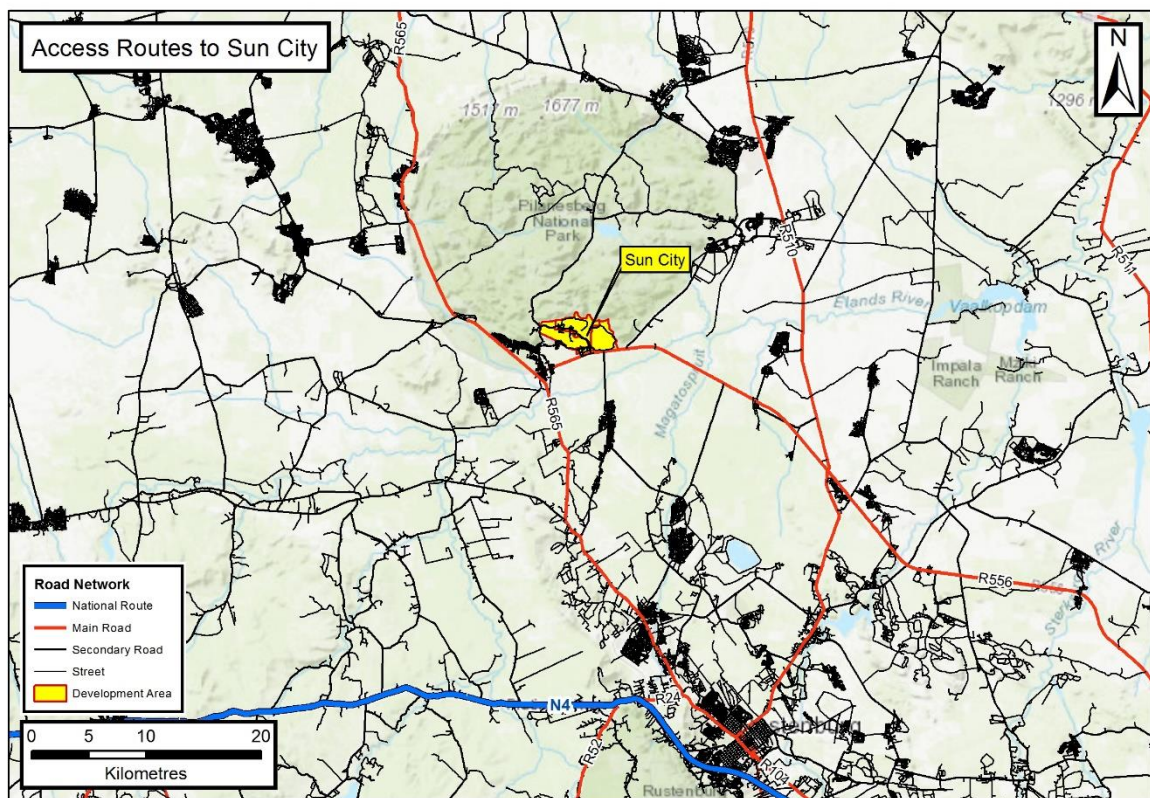


Figure 3-5: Access Route to Sun City

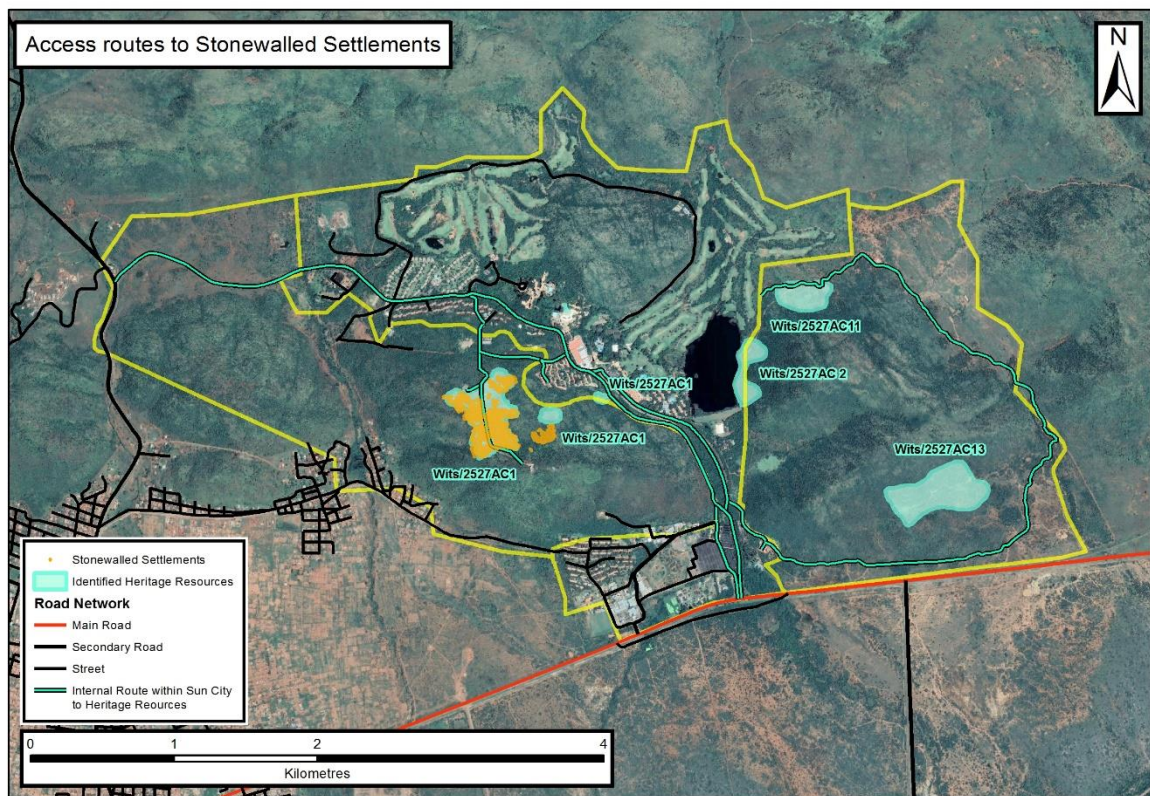


Figure 3-6: Access Routes to Primary Stonewalled Settlements

## 4 Management Structures

### Guidance Note

Implementation of a CMP requires co-operation between several entities that have bearing on the way various interests and policy objectives are implemented. These need to be captured in a CMP to define competencies, responsibilities and modalities of co-ordination. The management plan should contain a description of all these entities as well as a binding agreement of their competences and responsibilities in the context of the plan.

### 4.1 Ownership

#### Guidance Note

The ownership structure and organisational form of the operating entity must be explained with respect to proprietors and users.

The Project is situated on farms Ledig 909 JQ Ptn 7 and Doornhoek 910 JQ RE of Ptn 1. The National Government is the landowner leasing the properties to Sun International in respect of Notarial Deed of Lease K6/1978L, as amended.

Sun International, as the operator of Sun City is responsible for the implementation and management of the Project, which includes the development of the Heritage CMP.

**Table 4-1: Details of the Land Owner**




<b>Land Owner</b>	National Government of the Republic of South Africa Property is leased from the Government of South Africa (Notarial Deed of Lease: K6/1978L, as amended).		
<b>Contact person:</b>	Richard Keothaile		
<b>Postal address:</b>	Private Bag 74 Mmabatho 2745		
<b>Telephone:</b>	+27 (0) 18 397 7600	Fax:	+27 (0) 18 381 1875

Heritage resources are contemplated in terms of Section 3 of the NHRA. Section 3(1) states, “For the purposes of this Act, those heritage resources of South Africa which are of cultural significance or other special value for the present community and for future generations must be considered part of the national estate and fall within the sphere of operations of the heritage resources authorities”.

The national estate may include *inter alia* 2(a) places, buildings, structures and equipment of CS; (b) places to which oral traditions are attached or which are associated with living heritage; (c) historical settlements or townscapes; and (f) archaeological or palaeontological sites.

## 4.2 Legal Status of Entities

**Table 4-2: Legal Status of Entities**

Entity	Role
 National Government of the Republic of South Africa	Landowner
 Sun International	Lessee Heritage CMP Implementation
 SAHRA	Competent Authority



### 4.3 Competencies and Responsibilities

Sun International is responsible for the conservation and ethical management of heritage resources within Sun City. Heritage resources as contemplated in the NHRA (cf. sub-section 4.1 above) form part of the national estate falling under the jurisdiction of the relevant heritage resource authorities established in respect of Section 4(d) of the NHRA. In the context of this document, these include SAHRA and NW-PHRA as the competent authorities responsible for the regulation of the Heritage CMP in terms of the national legislative framework. The NHRA states:

*34. (1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.*

*35. (1) Subject to the provisions of section 8, the protection of archaeological and palaeontological sites and material and meteorites is the responsibility of a provincial heritage resources authority.*

*36(1) Where it is not the responsibility of any other authority, SAHRA must conserve and generally care for burial grounds and graves protected in terms of this section, and it may make the necessary arrangement for their conservation as they see fit.*

### 4.4 Coordination Mechanisms between Entities

The South African Heritage Resources Information System (SAHRIS) platform will be the primary co-ordination mechanism between the various entities. The SAHRIS platform is in the public domain and will allow for process transparency. All documentation, including the Heritage Impact Assessment (HIA) and CMP, will be captured under the unique SAHRIS Case ID: 12431<sup>8</sup>

## 5 Principles for Planning and Action

This chapter details a situational analysis of the Project that informs the guiding principles of the Heritage CMP. The guiding principles in turn serve as the foundation to develop specific and achievable objectives, targets and strategies.

These steps are presented separately in the following sections, culminating in a masterplan of action which Sun International must implement.

### 5.1 Situational Analysis

Digby Wells, in consultation with Sun International and identified key stakeholder (cf. Table 2-2) completed a situational analysis of the Project by means of SWOT (*Strengths, Weaknesses, Opportunities, and Threats*). The SWOT Analysis identified:

- Current strengths of the Project as relevant to the Heritage CMP;

---

<sup>8</sup> Available at <https://sahris.sahra.org.za/cases/sun4642-sun-city-developments>

- Current weaknesses of the Project as relevant to the Heritage CMP;
- Achievable opportunities; and
- Threats to the implementation of the proposed masterplan of action (cf. sub-section 5.4 below).

The outcomes of the SWOT Analysis are presented in Table 5-1.

Table 5-1: SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>■ Sun International acknowledges the heritage value and need for management of heritage resources;</li> <li>■ Sun International comprise a pool of technically qualified staff;</li> <li>■ The local area is an established tourist destination, e.g. Sun City and the Pilanesberg;</li> <li>■ Sun City is serviced by an established road and power network;</li> <li>■ The Sun City HIA provides reasonable and feasible management measures that SAHRA has approved;</li> <li>■ The identified stone-walled settlement has been recorded in detail, with limited archaeological excavations;</li> <li>■ Heritage resources are formally protected by the NHRA, their management further informed by international best practice doctrinal text;</li> <li>■ Sun International have a culture of training and education of the local community, with processes in place to implement;</li> <li>■ Sun City has processes and individuals to facilitate community liaison and Socio-Economic Development (SED);</li> <li>■ Sun City promote and support enterprise development;</li> </ul>	<ul style="list-style-type: none"> <li>■ The processes and relationships with traditional leadership and community structures are not formalised;</li> <li>■ Previous developments have damaged the stonewalled settlement and affected the authenticity of the heritage resources;</li> <li>■ The recorded heritage resources do not reflect an exhaustive inventory of heritage resources that may be present, or may have been present;</li> <li>■ As part of the Sun City HIA, no oral histories were recorded in support of the assessment;</li> <li>■ Detailed research on the stone-walled settlements within the Sun City is absent.</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>■ Proactive conservation of cultural heritage as a finite resource for future generations</li> <li>■ Avoid and reduce the intensity of the limited identified impacts and promote the enhancement of the attributed CS;</li> <li>■ Sun International actively promote cultural heritage themes;</li> <li>■ Vested stakeholders can align strategies to capitalise on potential socio-economic benefits;</li> <li>■ Capitalise on positive impacts of potential employment and income creation;</li> <li>■ Development of a managed Cultural Heritage Tourism offering to revitalise the regional history;</li> <li>■ Strengthened relationships with the relevant stakeholders and Sun City, such as the Mphebotho Cultural Museum;</li> <li>■ Opportunities for researchers to investigate cultural heritage of the region that develop understanding of patterns in the country's history;</li> <li>■ Traditional leaders have a vested interest in their tangible heritage and can contribute to the management of the heritage of the region;</li> <li>■ The current community liaison processes can be utilised to extend and strengthen the relationship between Sun City, traditional leader and community structures;</li> <li>■ The CMP can facilitate the education of the surrounding community of the cultural heritage of the region;</li> </ul>	<ul style="list-style-type: none"> <li>■ The tangible heritage resources are subject to natural deterioration through time that effects the integrity of the heritage resources;</li> <li>■ Unmanaged tourism activities may accelerate degradation of the known tangible heritage resources and therefore threaten the integrity of the heritage resources;</li> <li>■ The arrival of new job seekers to the area increase risk of vandalism of heritage resources presently outside the Sun City perimeter fencing;</li> <li>■ Community use of land and continued reclaiming of stone walling threaten integrity of heritage resources outside the Sun City perimeter fencing.</li> </ul>

## 5.2 Guiding Principles

The developed guiding principles for this Heritage CMP are:

- The CMP is a framework for planning and not a plan for implementation;
- The CMP must accommodate strategic, flexible and iterative planning procedures to consider the development needs of Sun City and that of the heritage consumer;
- The CMP reaffirms that the heritage resources form part of the national estate and as such the public share in the responsibility of supporting and conserving them;
- The CMP must promote the long-term sustainable conservation of the cultural heritage resources within Sun City;
- The CMP recognises the need for education to promote conservation;
- The CMP will recognise the intrinsic CS of cultural heritage as contemplated in the NHRA, acknowledge the general protections afforded to heritage resources and the mandate to conserve;
- The CMP will define the established limits of acceptable change and detail the preservation mechanisms to be adhered to;
- The CMP must ensure the integrity of the cultural heritage resources and landscape is at a minimum maintained and at best enhanced; and
- The identified heritage resources do not occur in isolation and planning must ensure integration within the surrounding landscapes, economic and traditional leader and community structures at local and regional levels.

## 5.3 Objectives, Targets and Strategies

### **Guidance Note**

Principles for planning and actions are anchored in general strategies and policies. These will have specific targets that should be defined and met through the implementation of the CMP. What is best for a heritage site considering the specific, defined CS and the opportunities is the main objective of any CMP. Several aspects, such as preservation, access, provisions for science and research should be integrated with this objective, as well as a vision for the future and sustainable use.

The guiding principles serve as the foundation to defining specific objectives and developing achievable targets and strategies. Therefore, commensurate to this Heritage CMP the following objectives, targets and strategies are applicable:

**Table 5-2: Objective 1, Targets and Strategies**

<b>Primary Objective 1</b>		
To preserve tangible heritage resources for current and future generations through proactive management.		
<b>Sub-Objective</b>	<b>Target</b>	<b>Strategy</b>
Maintain a comprehensive inventory of tangible heritage resources.	Maintain a comprehensive inventory of tangible heritage resources within Sun City.	<ul style="list-style-type: none"> <li>▪ Maintain the developed cultural heritage resource inventory created during the EIA Process<sup>9</sup>.</li> </ul>
	Update the heritage resources inventory, as and when required.	<ul style="list-style-type: none"> <li>▪ Record all newly identified cultural heritage resources in accordance with the requirements of Chapter 11 of the Cultural Heritage Survey Guidelines and Assessment Tools for Protected Areas in South Africa (2017) as a standard.</li> </ul>
	Update the Inventory of National Estate in terms of Section 39 of the NHRA.	<ul style="list-style-type: none"> <li>▪ A qualified and accredited archaeologist must audit the heritage resources inventory every 5 years;</li> <li>▪ Supply the vetted heritage resources inventory to SAHRA via SAHRIS every 5 years.</li> </ul>

<sup>9</sup> Cf. Section 11.2.9 of the approved EIA and the HIA available at <https://sahris.sahra.org.za/cases/sun4642-sun-city-developments>



Primary Objective 1		
To preserve tangible heritage resources for current and future generations through proactive management.		
Sub-Objective	Target	Strategy
Implement international best practice management and mitigation measures that avoid/remove/reduce risk to cultural heritage resources and various entities	Strive to achieve compliance with the principles encapsulated in Section 5 of the NHRA with specific reference to (7):  <i>(b) Take account of material or cultural heritage value and involve the least possible alteration or loss of it;</i>  <i>(e) safeguard the options of present and future generations.</i>	<ul style="list-style-type: none"> <li>▪ Implement the scope and procedures of the CMP as detailed in Chapter 6;</li> <li>▪ Review the Heritage CMP every 5 years for submission to SAHRA via SAHRIS.</li> </ul>
	Comply with the requirements of the South African regulatory framework, with specific reference to the NHRA in terms of Sections 35(4) and 36(3).	
	Identify all risks to the <i>in-situ</i> conservation of all cultural heritage resources and implement proactive management measures to avoid or remove risks.	
	Promote the <i>in-situ</i> conservation of all cultural heritage resources as far as is feasible.	
	Mitigate cultural heritage resources to reduce intensity of identified impacts and/or risks in accordance with the requirements of the South African regulatory framework, with specific reference to the NHRA in terms of Sections 35(4) and 36(3), and the NHRA Regulations (GN R 548).	

**Table 5-3: Objective 2, Targets and Strategies**

<b>Primary Objective 2</b>		
To present heritage resources for current and future generations through engagement and research.		
<b>Sub-Objective</b>	<b>Target</b>	<b>Strategy</b>
To enable the interpretation and awareness of the regional cultural heritage context, supported through research and knowledge management.	Strive to achieve compliance with the principles encapsulated in Section 5 of the NHRA with specific reference to (7):  <i>(c) promote the use and enjoyment of and access to heritage resources, in a way consistent with their cultural significance and conservation needs; and</i>  <i>(f) be fully researched, documented and recorded.</i>	<ul style="list-style-type: none"> <li>▪ Establish partnerships with the relevant institutions to encourage cultural heritage research;</li> <li>▪ Facilitate and strengthen relationships with traditional leadership structures and the Mphebotho Cultural Museum to foster knowledge acquisition;</li> <li>▪ Develop curated experiences, information sharing solutions and outreach programmes to local community structures.</li> </ul>
To develop appropriate skills and partnerships at local and regional levels that promote the recording and effective management of all cultural heritage resources.	Strive to achieve compliance with the principles encapsulated in Section 5 of the NHRA with specific reference to (7):  <i>(d) contribute to social and economic development.</i>	<ul style="list-style-type: none"> <li>▪ Identify human resources from the local community to assist in the partial implementation of the scope and procedures of the CMP as detailed in Section 6 below;</li> <li>▪ Leverage the Sun City SED to develop local enterprises.</li> </ul>

## 5.4 Masterplan of Action

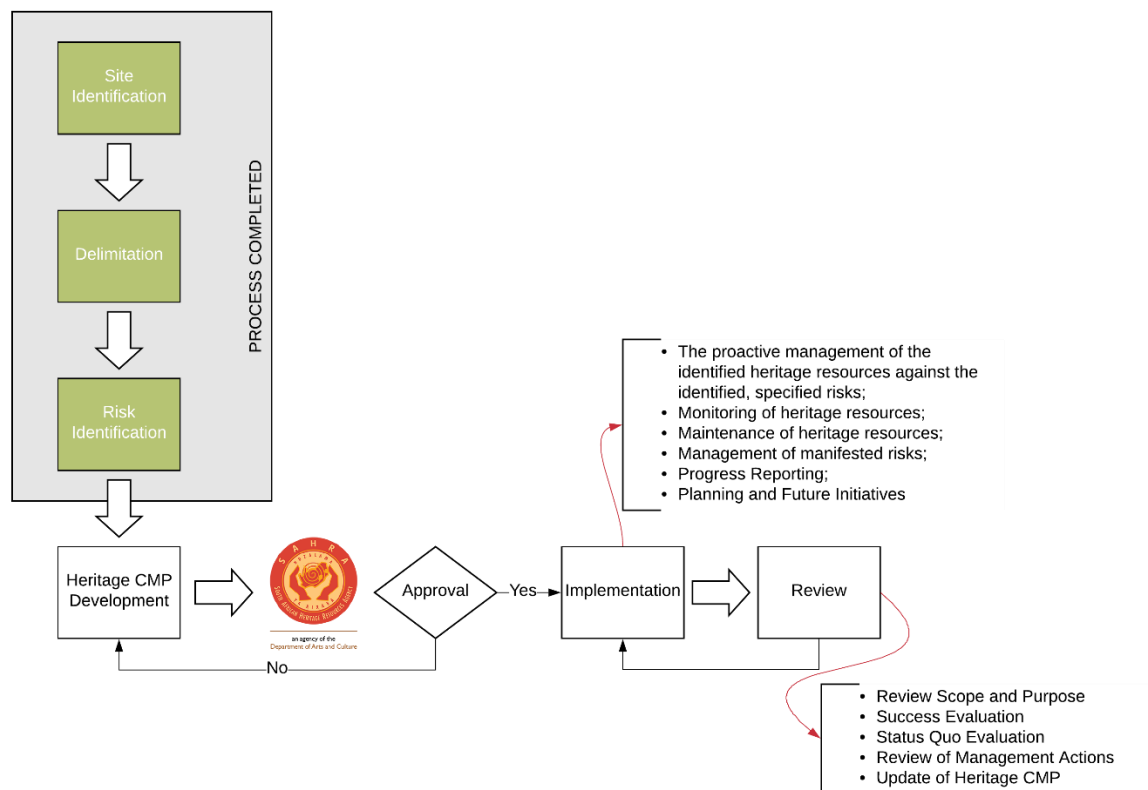


Figure 5-1: Current Masterplan of Action

## 6 Preservation Mechanisms

### Guidance Note

Preservation, as the broadest objective of a CMP, is undertaken for specific purposes that must consider all aspects. A CMP must aim to balance the benefits of preservation with acceptable levels of degradation.

In accordance with the guiding principles and primary objectives introduced in Chapter 5 above, this chapter details the required preservation mechanisms applicable to Sun City.

To develop appropriate and feasible mechanisms commensurate to the nature of this Project, potential current and future risks to known heritage resources must be identified. These are considered under sub-section 6.1. The consequent preservation mechanisms discussed under sub-sections 6.2 and 6.3 include:

- Project-related mitigation measures;
- Heritage-related mitigation measures; and
- Preventative protection measures.



## 6.1 Current and Future Risks

### Guidance Note

Current and future threats to heritage sites and the cultural landscape must be identified, defined and assessed. The CMP must aim at balancing risks with preservation to ensure threats become opportunities.

The heritage resources within Sun City are faced with both current and future risks. These inform the development of feasible preservation mechanisms aimed at reducing the likelihood of identified risks manifesting. This section provides a summary of the identified risks with the aim of balancing these with preservation requirements.

The identified risks include:

**Table 6-1: Identified Current and Future Risks**

Current	Future
<ul style="list-style-type: none"> <li>■ Destruction through human reclamation of stonewalling;</li> <li>■ Damage by animal activities;</li> <li>■ Degradation through natural processes, e.g. erosion or lightning strikes</li> </ul>	<ul style="list-style-type: none"> <li>■ Damage or destruction of heritage sites during construction of proposed developments;</li> <li>■ Damage during maintenance activities;</li> <li>■ Unmanaged tourism.</li> </ul>

Sun International considered the future risks to the heritage resources within Sun City, in part, through the Environmental Authorisation Processes completed in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). These are presented in the following tables:

**Table 6-2: Identified Future Risks (Case ID: 12749)**

Risk	Pre-mitigation:					
	Duration	Extent	Intensity	Consequence	Probability	Significance
Damage to or destruction of <i>Itholanoga</i>	Permanent	Very limited	High - negative	Moderately detrimental	Certain	Moderate – negative

**Table 6-3: Identified Future Risks (Case ID: 12431)**

Risk	Pre-mitigation:					
	Duration	Extent	Intensity	Consequence	Probability	Significance
Damage to or destruction of heritage resources	Permanent	International – Reputational	Extremely high – negative	Highly detrimental	Highly probable	Major - negative

Further to the specified current and future risks, Sun International recognises that unplanned events may occur that could impact on heritage resources within Sun City. In this instance, this may include the accidental exposure, damage to and / or destruction of previously unidentified heritage resources.

## 6.2 Preventative Protection

### Guidance Note

Preventative protection has important implications to the implementation of conservation management and future planning. These measures protectively cover the most vulnerable components to prevent degradation of the heritage sites and cultural landscapes from identified risks. These measures must aim at improving the conditions for preservation that can be adapted and refined through time.

This section presents preventative protection measures to remove, avoid and reduce risks specified in Table 6-1. These measures are considered from two perspectives, namely:

1. Requirements for specified Projects with Environmental Authorisation; and
2. General preventative protection measures.

**Table 6-4: Preventative Protection as Relevant to Possible Future Risks**

Activity	Phase	Requirements	Compliance Standards
<b>Chairlift Project</b>			
Construction of new Chairlift to the Sun Star	Pre-Construction	Sun International must, as far as is feasible, amend the development footprint to avoid the manifestation of identified risks to <i>Itlholanoga</i> .	The National Heritage Resources Act, 1999 (Act No.25 of 1999)  Regulations to the National Heritage Resources Act (GN R 548)  International Finance Corporation Performance Standards 8: Cultural Heritage
		A 50 m buffer must be established around identified heritage resource <i>Itlholanoga</i> . The buffer must be clearly demarcated, and signage placed to indicate the presence of the resource.	
	Construction	Implement a Chance Find Protocol (CFP). Newly identified heritage resources or cultural material must be recorded in the inventory (cf. Table 5-2).	
		Construction activities must be monitored by a qualified archaeologist (Refer to 6.3 below).	
<b>Resort Expansion Projects</b>			
Construction of Vacation Club Phase 4	Pre-Construction	Sun International must, as far as is feasible, amend the development footprint to avoid the manifestation of identified risks to STW-001.	The National Heritage Resources Act, 1999 (Act No.25 of 1999)  Regulations to the National Heritage Resources Act (GN R 548)  International Finance Corporation Performance Standards 8: Cultural Heritage
		A 25 m buffer must be established around identified heritage resource STW-001. The buffer must be clearly demarcated, and signage placed to indicate the presence of the resource.	
		Where realignment of the development footprint is not feasible, the STW-001 must be recorded in detail subject to the approval of a Section 35 Permit, after which a Destruction Permit in terms of Section 35 must be obtained.	
	Construction	Implement a CFP. Newly identified heritage resources or cultural material must be recorded in the inventory (cf. Table 5-2).	
<b>Utilities and Service Projects</b>			
Construction of new reservoirs to supplement existing water storage capacity	Pre-Construction	Sun International must, as far as is feasible, amend the development footprint to avoid the manifestation of identified risks to <i>Itlholanoga</i> .	The National Heritage Resources Act, 1999 (Act No.25 of 1999)  Regulations to the National Heritage Resources Act (GN R 548)  International Finance Corporation Performance Standards 8: Cultural Heritage
		A 50 m buffer must be established around identified heritage resource <i>Itlholanoga</i> . The buffer must be clearly demarcated, and signage placed to indicate the presence of the resource.	
	Construction	Implement a CFP. Newly identified heritage resources or cultural material must be recorded in the inventory (cf. Table 5-2).	
		Construction activities must be monitored by a qualified archaeologist (Refer to 6.3 below).	
Replacement of the effluent transfer line	Construction	Implement a CFP. Newly identified heritage resources or cultural material must be recorded in the inventory (cf. Table 5-2).	

Activity	Phase	Requirements	Compliance Standards
		Construction activities must be monitored by a qualified archaeologist (Refer to 6.3 below).	
Maintenance Projects			
Clearance of fence roads	Operation	Implement a CFP. Newly identified heritage resources or cultural material must be recorded in the inventory (cf. Table 5-2).	<p>The National Heritage Resources Act, 1999 (Act No.25 of 1999)</p> <p>Regulations to the National Heritage Resources Act (GN R 548)</p> <p>International Finance Corporation Performance Standards 8: Cultural Heritage</p>

**Table 6-5: General Preventative Protection Measures**

Activity	Phase	Requirements	Compliance Standards
Avoid accidental damage to heritage resources	Pre-Feasibility	Complete a Heritage Impact Assessment for all new Projects that trigger Section 38(1) of the NHRA or Listed Activities as contemplated in GN R 982 (As amended by GN R 326).	<p>The National Heritage Resources Act, 1999 (Act No.25 of 1999)</p> <p>Regulations to the National Heritage Resources Act (GN R 548)</p> <p>International Finance Corporation Performance Standards 8: Cultural Heritage</p>
	Operation	Establish a 50 m buffer around <i>Itlholanoga</i> and 25 m buffer around all other identified heritage resources.	
		Use baseline conditions to allow for measured <i>status quo</i> monitoring (cf. sub-section 6.3 below).	
		Place signage along routes and in proximity to heritage resources to inform users of their presence.	
		Limit operational activities within buffer areas to only essential tasks and activities.	
		Enforce reduced speed limits in established routes through or in proximity to identified heritage resources.	
Avoid degradation of the intrinsic CS of the heritage resources		Complete monthly maintenance to remove overgrowth and reduce the intensity of natural degradation processes.	

## 6.3 Monitoring

### Guidance Note

A CMP cannot be static and must be conceived in terms of a cycle. Defined measures must be implemented, evaluated, reviewed, and if necessary altered or withdrawn. Monitoring should target specific issues, measure specific parameters of change or react to specific events. Monitoring should be measured against recorded baseline conditions.

Sun International will be required to complete monitoring activities throughout the operation of Sun City. The identified resources detailed in Chapter 8 below will assume overall responsibility for the monitoring requirements and where necessary, appoint external technical specialists to comply with the requirements stipulated in this Heritage CMP.

The monitoring requirements are discussed as relevant to the activities specified in the two Environmental Authorisations. These must be reviewed on an annual basis, or as relevant to changes in the *status quo*, to assess their effectiveness, alter where necessary, and withdraw requirements no longer relevant.

### 6.3.1 Construction Phase

Presently, construction activities pose the greatest threat to heritage resources within Sun City. To manage the risk of damage to or destruction of these resources, the monitoring measures listed in Table 6-6 are required.

**Table 6-6: Construction Phase Monitoring**

Activity	Responsibility	Requirements
Construction of new Chairlift to the Sun Star	Archaeologist <sup>10</sup>	<ul style="list-style-type: none"> <li>■ On-site <i>status quo</i> inspection;</li> <li>■ Guide construction to avoid possible impacts;</li> <li>■ Records and assess identified chance find;</li> <li>■ Compile Watching Brief Report for submission to SAHRA</li> </ul>
Construction of new reservoirs to supplement existing water storage capacity		
Replacement of the effluent transfer line		
Construction of Vacation Club Phase 4	Sun City Supervisor	Implement a CFP
Clearance of fence roads	Construction Manager	

<sup>10</sup>A Watching Brief is required to comply with the requirements of the Statutory Comments issued. The presence of an archaeologist is mandatory for earth-moving activities in which stonewalled settlements are at risk of accidental damage, or possible exposure of sub-surface cultural material remains can occur.

### 6.3.2 Operational Phase

Sun International must monitor identified heritage resources within Sun City against baseline conditions to measure changes through time or react to specific events. The monitoring requirements throughout the operation of Sun City are presented in Table 6-7.

**Table 6-7: Operational Phase Monitoring**

Responsibility	Frequency	Pro- / Reactive	Requirements
Sun City Supervisor	Biannual	Proactive	<ul style="list-style-type: none"> <li>■ Record <i>status quo</i>;</li> <li>■ Maintain records; and</li> <li>■ Report on monitoring results.</li> </ul>
Archaeologist	Biennial	Proactive	<ul style="list-style-type: none"> <li>■ Visually assess <i>status quo</i>;</li> <li>■ Review monitoring records against baseline conditions; and</li> <li>■ Review and update management measures.</li> </ul>
	Unplanned Event Manifestation	Reactive	<ul style="list-style-type: none"> <li>■ Visually assess <i>status quo</i>;</li> <li>■ Record impact;</li> <li>■ Recommend required mitigation measures;</li> <li>■ Compile memorandum for submission to SAHRA;</li> <li>■ Permitting, where required, to comply with GN R 548.</li> </ul>

## 6.4 Progress Reporting

### **Guidance Note**

Progress reporting should present details to the *status quo*, state of degradation or stability to guide proactive management measures and competent authority decisions. Progress reporting is important as it correlates baseline conditions to the effectiveness of measures contained in the CMP.

The archaeologist must complete progress reporting as prescribed in Table 6-6 during the construction phase of the Project. Sun International is responsible for reporting as prescribed in Table 6-4, Table 6-5, Table 6-6 and Table 6-7.

Progress reports must be distributed via the defined co-ordination mechanisms (Refer to sub-section 4.4 above).

## 7 Awareness

### Guidance Note

The CMP must make provision for the dissemination of information to the public. Means of communication may vary considerably across various platforms. Nonetheless, information pertaining to the heritage sites, the cultural landscapes and the proposed management thereof must be freely available.

### 7.1 Public Awareness

The aim of this section is to identify and organise activities, in line with the Sun International Group Community and Stakeholder Engagement (C&SE) policy, to achieve the widest dissemination of knowledge generated from prior assessments (cf. Case ID: 12749 and Case ID: 12431) and subsequent implementation of the Heritage CMP taking cognisance of potential partnerships<sup>11</sup>. The proposed awareness initiative must consider:

- The defined sensitivities of the identified heritage resources;
- Identifying cultural heritage producers and consumers;
- Establishing relevant knowledge sharing partnerships;
- Engaging and strengthening established partnerships to reaffirm sensitivities and enhance the understanding of the cultural landscape; and
- Refining sources and mediums for affective dissemination of information.

An approach for the effective dissemination of information as relevant to this Heritage CMP is proposed in Table 7-1.

**Table 7-1: Approach to Creating Awareness**

Principles	Relevance
<b>Goals</b> <i>Specific goals trying to accomplish</i>	<ul style="list-style-type: none"> <li>■ Widest dissemination of knowledge generated.</li> </ul>
<b>Objectives</b> <i>Specific objectives to achieve defined goal</i>	<ul style="list-style-type: none"> <li>■ Identify users of information;</li> <li>■ Determine sources of access and appropriate mediums;</li> <li>■ Define possible barriers; and</li> <li>■ Detailed public disclosure of information at the earliest possible stage.</li> </ul>
<b>Users</b> <i>Potential users</i>	<ul style="list-style-type: none"> <li>■ Sun International, other affiliated facilities or entities, service providers and business partners;</li> <li>■ General public;</li> <li>■ Local communities;</li> <li>■ Traditional authorities;</li> </ul>

<sup>11</sup> To establish and nurture partnerships at local levels and regional scales by creating, participating-in and maintaining engagement platforms including knowledge sharing alliances.

Principles	Relevance
	<ul style="list-style-type: none"> <li>▪ Heritage authorities;</li> <li>▪ Government;</li> <li>▪ Non-Governmental Organisations; and</li> <li>▪ International research community.</li> </ul>
<b>Content</b> <i>Salient information for specific user groups</i>	<ul style="list-style-type: none"> <li>▪ Cultural landscape descriptions;</li> <li>▪ Results of research;</li> <li>▪ Inherent sensitivities of the cultural heritage resources.</li> </ul>
<b>Source</b> <i>Users access</i>	<ul style="list-style-type: none"> <li>▪ SAHRIS;</li> <li>▪ Sun International digital portals;</li> <li>▪ Sun City Information Centre;</li> <li>▪ Pilanesberg National Park; and</li> <li>▪ Mphebotho Cultural Museum.</li> </ul>
<b>Medium</b> <i>Best method for information sharing</i>	HRM Process
	<ul style="list-style-type: none"> <li>▪ Announcement materials;</li> <li>▪ Advertisements;</li> <li>▪ Stakeholder meetings;</li> <li>▪ Workshops;</li> <li>▪ Written and visual communication;</li> <li>▪ Reporting</li> </ul>
	Sun International
<b>Access</b> <i>Process to make information accessible</i>	<ul style="list-style-type: none"> <li>▪ Workshops;</li> <li>▪ Written and visual communication;</li> <li>▪ Reporting.</li> </ul>
<b>Availability</b> <i>Promoting awareness of information availability</i>	<ul style="list-style-type: none"> <li>▪ Digital portals; and</li> <li>▪ Print materials.</li> </ul>
<b>Barriers</b> <i>Determination of obstacle for information dissemination barriers for targeted users</i>	<ul style="list-style-type: none"> <li>▪ Ineffective promotion of awareness;</li> <li>▪ Limited access forums;</li> <li>▪ Lack of technical understanding.</li> </ul>

## 7.2 Contractor Awareness

Sun International is responsible for ensuring that service providers are aware of the heritage sensitivities and furnished with the necessary information and skills to implement the requirements of the Heritage CMP. This must comprise *inter alia*:

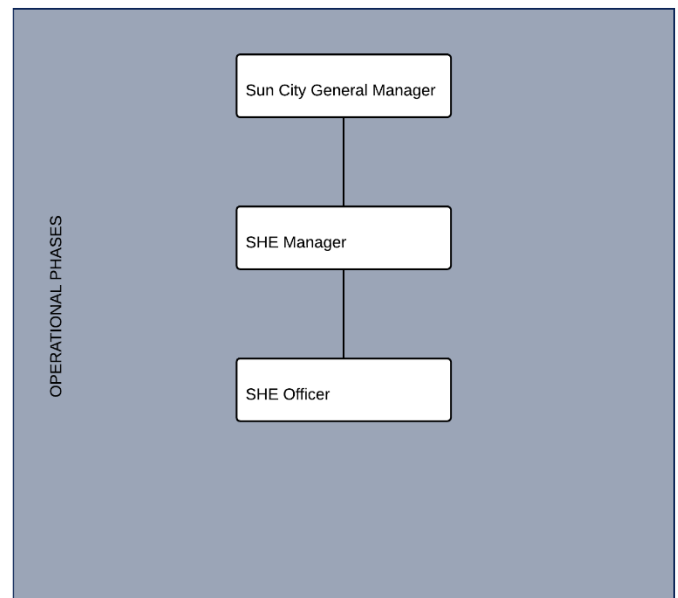
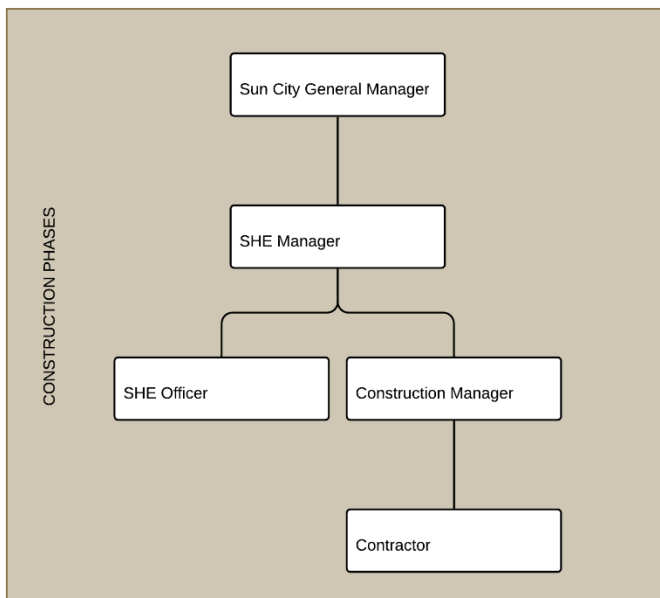


- Brief explanation of the cultural heritage sensitivities;
- Defined roles and responsibilities;
- Provide visual guides and on-site induction to expose service providers to the tangible cultural heritage types;
- Detail the ‘conserve’ protocol (cf. the CFP).

## 8 Resources

### Guidance Note

A CMP must detail the resources required for its implementation. Resources from other entities that promote the management objectives and actions should be listed.



## 9 Sustainable Use and Vision for the Future

### Guidance Note

A CMP must adapt through time to meet the specific requirements for the continued use of the heritage sites and cultural landscapes for the benefit of society.

Sun International are committed to the *in-situ* conservation of heritage resources. The primary objective of conserving the Sun City heritage resources is, as far as feasible, sustainable use that considers:

- The retention of the defined CS of the heritage resources; and
- Acknowledges and respects the acceptable limits of change.

This section describes the current vision for the future of the Sun City heritage resources that highlights recommended requirements to promote sustainable use.

## 9.1 Vision for 2024

The heritage resources within the Sun City Resort Complex constitute a component of the regional cultural landscape serving as a vehicle to foster collaboration in research and knowledge acquisition, cultural affinity and sustainable tourism.

### 9.1.1 Research and Knowledge Acquisition

Heritage research comprises assessing factors that contribute to cultural meaning while balancing interpretations from various stakeholders. Research methodologies should be constructed within disciplinary frameworks, legal instruments and international best practice standards.

Research must acknowledge and incorporate the varying interpretations ascribing meaning to the heritage resources and cultural landscape into the narrative developed. The outcomes of the research must furthermore inform possible sustainable uses of the heritage resources considering the scale of possible impacts and specific monitoring requirements. Table 9-1 presents a proposed research and knowledge acquisition action plan for 2019 – 2024.

**Table 9-1: Proposed Action Plan 2019 - 2024**

Activity	Key Indicator	Partners
Objective: Conduct In-Depth Research		
2019 - 2020		
Encourage research: Formalise relationship with relevant stakeholders.	Memorandum of Understanding.	Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.
Encourage research: Consolidate existing information.	Inventory.	SAHRA; Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.
Encourage research: Develop research programmes.	Research Proposals.	Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.

Activity	Key Indicator	Partners
2021-2022		
Encourage research: Implement research programme.	Research activities executed.	Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.
2023 - 2024		
Encourage research: Implement research programme.	Academic papers; Museum exhibits.	Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.
Encourage research: Exploit generated information.	Proposed sustainable uses; Museum exhibits updated.	Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.

### 9.1.2 Sustainable Tourism and Cultural Affinity

Tourism comprises a network of activities resulting in direct and indirect impacts on cultural heritage and the uses thereof. For it to be sustainable, it must be informed by sound research, be developed in a responsible manner, and have a direct benefit to local communities. Table 9-2 presents a proposed sustainable tourism and cultural affinity action plan for 2019 – 2024.

**Table 9-2: Proposed Action Plan 2019 - 2024**

Activity	Key Indicator	Partners
Objective: Conserve and Protect Heritage Resources		
2019 - 2020		
Introduce conservation strategy: Heritage CMP approval	Approved Heritage CMP	SAHRA
Increase staff awareness: Sensitise staff to requirements.	Approved Heritage CMP.	SAHRA.
Increase staff awareness: Display rules.	Signage; Notices.	SAHRA.
Increase community awareness: Formalise relationships with relevant stakeholders.	Memorandum of Understanding.	Traditional Authorities; Mphe batho Cultural Museum.

<b>Activity</b>	<b>Key Indicator</b>	<b>Partners</b>
Increase community awareness: Develop awareness programme.	Awareness material.	Traditional Authorities; Mphe batho Cultural Museum.
Increase community awareness: Display rules.	Signage; Notices.	SAHRA.
2021-2022		
Introduce conservation strategy: Implementation of strategy for preservation	Continuous implementation; Monitoring reports.	-
Increase community awareness: Develop suitable educational tools.	Posters, booklets and digital material developed and displayed	Universities; Mphe batho Cultural Museums
2023-2024		
Introduce conservation strategy: Implementation of strategy for preservation	Continuous implementation; Monitoring reports.	-
Increase community awareness: Develop suitable educational tools.	Posters, booklets and digital material developed and displayed	Universities; Mphe batho Cultural Museums
Introduce conservation strategy: Evaluation of strategy for preservation	Analysed result; Proposed Heritage CMP Updates	SAHRA
Objective: Enhance Presentation and Promotion		
2019-2020		
Increase general awareness: Formalise relationship with relevant stakeholders	Memorandum of Understanding.	Pilanesberg National Park; Traditional Authorities; Mphe batho Cultural Museum.
2021-2022		
Increase general awareness: Recommend local heritage route within Sun City and Pilanesberg National Park	Defined local heritage route	Pilanesberg National Park; Traditional Authorities; Mphe batho Cultural Museum.
Increase general awareness: Develop awareness programme.	Awareness material.	Pilanesberg National Park; Traditional Authorities; Mphe batho Cultural Museum.
2023-2024		

<b>Activity</b>	<b>Key Indicator</b>	<b>Partners</b>
Presentation: Exploit generated information.	Proposed sustainable uses; Museum exhibits updated.	Association of Southern African Professional Archaeologists; Universities; Mphe batho Cultural Museum.
Presentation: Implement sustainable uses	Heritage resources sustainably used and route functioning.	Pilanesberg National Park; Traditional Authorities; Mphe batho Cultural Museum.
Objective: Generate sustainable development of local stakeholders		
2019-2020		
Economic empowerment: Review Sun International SED to promote alignment with 2024 Vision as applicable	Updated SED Policy	-
Economic empowerment: Review current SED initiative to identify potential, relevant service providers	List of Service Providers/Industry Gaps.	Local Authorities; Traditional Authorities.
2021-2022		
Economic empowerment: Facilitate SED opportunities with relevant services providers considering the 2024 Vision where suitable	Sustainable local service providers	Local Authorities.
Economic empowerment: Develop training programmes and literacy tools that promote the 2024 Vision as applicable to this CMP.	Training material.	Local Authorities.
Economic empowerment: Develop skills in local community and structures where suitable, to implement the contents of this CMP.	Training material and Skills Development.	Local Authorities.
2023-2024		
Economic empowerment: Implement sustainable SED initiatives in respect the 2024 Vision as relevant to this CMP.	Local service providers / staff	-

Activity	Key Indicator	Partners
Objective: Continued Management Improvement		
2019-2020		
Management: Establish a management committee at the local level	Defined roles and responsibilities accepted; Established management committee.	Local Authorities; Traditional Authorities.
2021-2022		
Management: Continual review of Action Plan	Specified action items reviewed, amended and updated; Annual committee meeting.	Management Committee.
2023-2024		
Management: Continual review of Action Plan	Specified action items reviewed, amended and updated; Annual committee meeting.	Management Committee.

Heritage Conservation Management Plan

The Sun City Resort Complex Heritage Conservation Management Plan Project 2019 - 2024

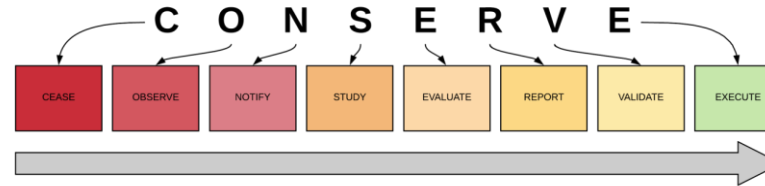
SUN4642



DIGBY WELLS  
ENVIRONMENTAL

---

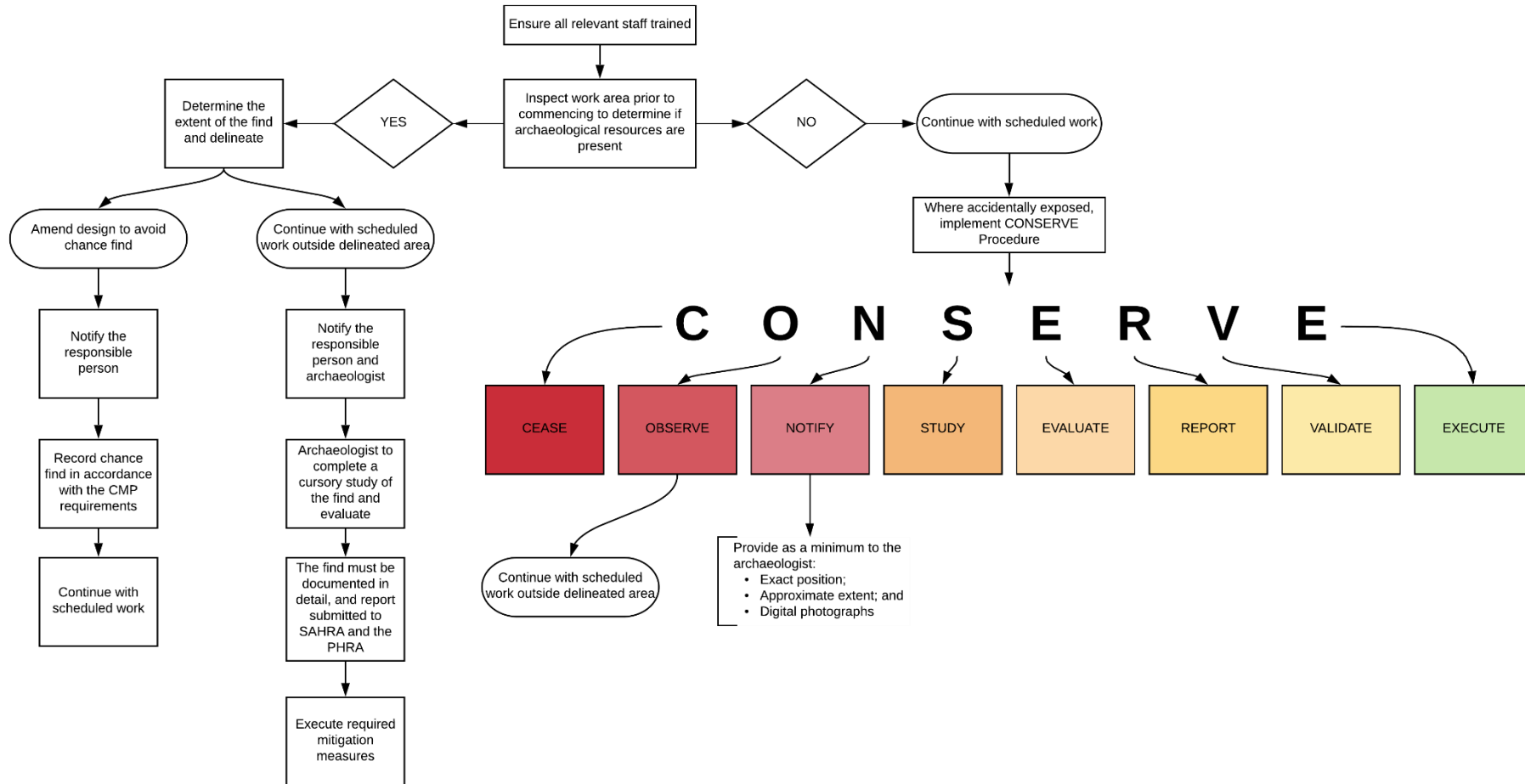
## Appendix A: Chance Find Protocol



<b>Cease</b>	Upon identification of any heritage aspect, all works in the immediate vicinity must cease
<b>Observe</b>	The approximate extent of the chance find must be determined and protected from further disturbance. Where necessary, establish access controls and place visible markers and signage to identify the find.
<b>Notify</b>	In the absence of a specialist, i.e. archaeologist, the identifier must inform the Site Manager / ECO of the find, and immediate management measures. An archaeologist must then be notified <sup>12</sup> by the Site Manager.
<b>Study</b>	A qualified specialist must complete a cursory assessment of the chance find. This can be accomplished through: <ul style="list-style-type: none"> <li>▪ Telephonic correspondence with the ECO – verbal descriptions;</li> <li>▪ Emails - photographs; and</li> <li>▪ Site inspection by the specialist.</li> </ul>
<b>Evaluate</b>	The qualified specialist will evaluate the chance find to determine the extent of the exposure, whether any protections in terms of Sections 34, 35 or 36 are applicable, and what minimum management and/or mitigation measures are required.
<b>Report</b>	The designated responsible person must ensure suitable reporting and documentation is undertaken. Documentation must start with the initial find report and include records of all action taken, persons involved and contacted, comments received and any findings. All records must be supplied to SAHRA and NW-PHRA for adjudication.
<b>Validate</b>	SAHRA and NW-PHRA must validate the preceding steps through issuing of formal comment to: <ul style="list-style-type: none"> <li>▪ Prescribe additional management and/or mitigation measures required;</li> <li>▪ Consent to continuation of work in the immediate vicinity of the chance find.</li> </ul>
<b>Execute</b>	Execute the required management and/or mitigation measures or recommence with work.

<sup>12</sup> Minimum requirements for providing information to a technical specialist will be detailed in the contractor awareness training material





Heritage Conservation Management Plan

The Sun City Resort Complex Heritage Conservation Management Plan Project 2019 - 2024

SUN4642



**DIGBY WELLS**  
ENVIRONMENTAL

---

## **Appendix B: Recording Form**



<b>Recorder:</b>		<b>Date:</b>	
<b>Classification:</b>	Immovable	Movable	Intangible
<b>Location:</b>		<b>Photograph Numbers:</b>	
<b>Ref No:</b>		<b>Co-ordinates</b>	
<b>1. Immovable Heritage Resources</b>			
<b>SAHRIS ID Reference:</b>			
<b>Type of resource:</b>	<small>Paleontological &amp; Archaeological Sites, Buildings, Monuments, Heritage Places, Bursals</small>	<b>Age / Industry / Period:</b>	<small>Cultural period / style / associated persons / history</small>
<b>Resource Description Summary:</b>			
<b>Functional Type:</b>		<b>Current Function:</b>	<small>Original / changed from past / current function</small>
<i>Please proceed to Section 4</i>			
<b>2. Movable Heritage Resources</b>			
<b>SAHRIS ID Reference:</b>			
<b>Type of resource:</b>	<small>Artifacts, artworks, books, documents, machines, clothing</small>	<b>Age / Industry / Period:</b>	
<b>Resource Description Summary:</b>			
<b>Quantity recorded:</b>			
<i>Please proceed to Section 4</i>			
<b>3. Intangible Heritage Resources</b>			
<b>SAHRIS ID Reference:</b>			
<b>Type of resource:</b>		To whom is the resource significant?	
Describe the resource or summarise provided information:			
<b>Restrictions/sensitivities:</b>	None	No photographs	Do not publish



<i>Please note any restrictions with regard to this information</i>	Other:					
Informant / source of information:				Wishes to remain anonymous		
<i>Please proceed to Section 4 (if necessary)</i>						
<b>4. Description and Notes</b>						
Please provide a brief description of the resource:						
<b>Condition of the resource:</b>	Damaged	Poor	Fair	Good		
<b>Quality of the resource: (Scales of damage)</b>	Poor	Fair	Good	Excellent		
Please describe: <i>(including scale of damage or neglect and factors influencing the integrity of the resource)</i>						
<b>Statement of Significance:</b> <i>(please provide a brief assessment of the significance of the resource, in your opinion)</i>	Negligible	Low	Medium	Med-Hi	High	V. High
<i>Consider aesthetic, historic, scientific and social criteria</i>						
Are there any observable / apparent threats / impacts to the resource?						



Please include any additional notes here:

*(e.g. any notable features, additional information from an informant, damage)*