



DIGBY WELLS  
ENVIRONMENTAL



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## Environmental Impact Assessment for proposed Future Developments within the Sun City Complex

### Notification of Intent to Develop

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**Project Number:**

SUN4642

**Prepared for:**

Sun International (Pty) Ltd

January 2018

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<b>Project Name:</b>	<b>Environmental Impact Assessment for proposed Future Developments within the Sun City Complex</b>
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## 1 Introduction

Sun International (Pty) Ltd (hereinafter Sun International) intends to undertake several developments (“the Project”) within the Sun City Resort Complex (hereinafter Sun City), including:

- Resort Expansion Projects;
- Utilities and Services Projects; and
- Maintenance Projects (detailed below).

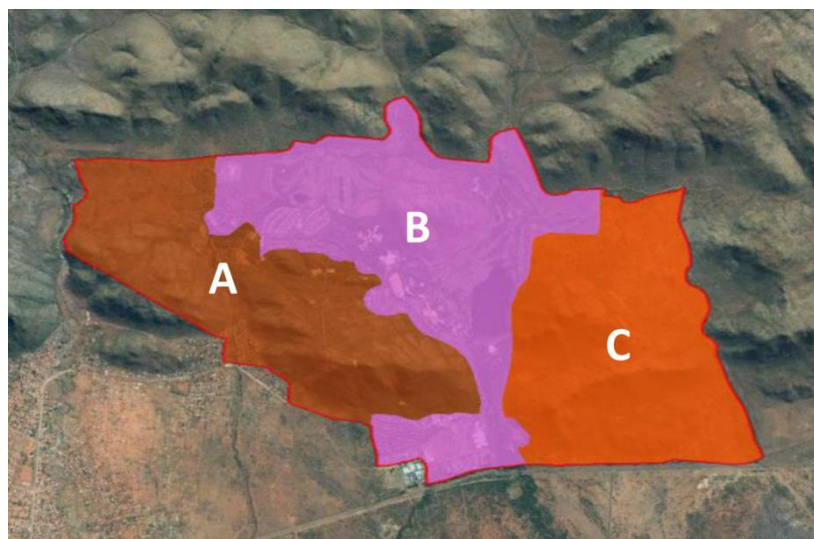
Sun International is required to complete an Environmental Impact Assessment (EIA) process in compliance with:

- The National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA);
- The NEMA Regulations, 2017(Government Notice Regulations [GN R 982]) as amended by GN R 326; and
- The National Water Act, 1998 (Act No. 36 of 1998) (NWA).

To this affect, Sun International has appointed Digby Wells Environmental (hereinafter Digby Wells) to complete a Heritage Resources Management (HRM) process in support of the EIA. This Notification of Intent to Develop (NID) serves to meet the regulatory requirements of the aforementioned legislation and Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA).

### 1.1 Project description

The Sun City Resort Complex presently includes approximately 920 hectares (ha) of undeveloped land, as shown in Figure 1. In this figure, ‘A’ refers to an undeveloped area of roughly 450ha, ‘B’ is the developed area and ‘C’ is an undeveloped area of roughly 470 ha.



**Figure 1: Sun City Complex boundary and study area**



Sun International is seeking Environmental Authorisation (EA) for several planned developments within Sun City (Refer to Figure 1). The proposed developments include:

- **Resort Expansion Projects:**
  - Development of a Bush Lodge or Eco-Lodge at Bakubung, west gate;
  - Construction of a road connecting the Driving Range at the Lost City Gold Course (LCGC) to the Gary Player Golf Course (GPGC) via the Palace Garden road and Valley of the Waves (VOW) road;
  - Construction of an additional 20 Rustic Chalets at Kwena Gardens;
  - Construction of an additional 150 simplex units and 2-3 bed units as well as the associated infrastructure to expand the capacity of the Vacation Club (VC Phase 3);
  - Expansion of the existing artificial beach at the Lake and construction of an additional shallow swimming pool at Waterworld Beach;
  - Decommissioning of the existing helipad and construction of a new helipad with increased bays closer to the Palace;
  - Construction of an additional parking garage, Convention Centre and Hotel (with 250 rooms) as well as a bridge to link the new Hotel to Sun Central;
  - Development of two soccer field at the Warehouse, on the old Motocross track;
- **Utilities and Services Projects:**
  - Installation of storm water pipes or culverts at both Gold Course roads;
  - Construction of either two 10Mℓ reservoirs or one 20Mℓ reservoir in Telkom Hill next to the existing Upper Reservoir;
  - Decommissioning of the effluent transfer line (old asbestos line) through Sunset Drive to Hole 2 and the installation of a new line against the Letsatsing fence;
  - Construction of a new water line from the Welcome Centre to the Sky Train, which will be attached to the Sky Train route;
  - Decommissioning of the sewer line (old asbestos line) through Ledig and the establishment of a new Wastewater Treatment Works (WWTW) to manage sewerage from VC and the Palace;
  - Construction of an additional pipeline for water supply to the South Village;
  - Consolidation of the generators throughout the site into one area for effective monitoring and control;
- **Monitoring Projects:**
  - Vegetation Clearance at perimeter fences to serve as maintenance roads and fire breaks (25 km); and



- Clearance of the culverts under the road at Sun Park from debris and siltation as well as the construction of a maintenance road to facilitate future maintenance.

## 1.2 Project location

The Sun City Resort Complex is located north of Rustenburg, within the Moses Kotane Local Municipality (MKLM) in the North West Province. A plan detailing the general Project locality is included in Appendix A. Table 1 presents a summary of the location details of the Project and the details of the landowners are presented in Table 2 below.

**Table 1: Project location details**

<b>Name of property/ies</b>	Sun City Resort
<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 Bojanala Platinum District Municipality)
<b>Extent of property</b>	Total lease area extends over 3 400 hectares (ha)
<b>Maximum extent of proposed development</b>	Linear infrastructure: 5 km Non-linear infrastructure: 625 ha
<b>Current use</b>	Resort (entertainment destination / tourism)
<b>Predominant land use/s of surrounding properties</b>	Leisure and Residential Natural/ Undisturbed

**Table 2: Landowner details**

<b>Name</b>	<b>Property</b>	<b>Notified</b>
Republic of South Africa	Ledig 909 JQ	N/A
	Doornhoek 910 JQ	



## 2 Assessment process

Table 3 summarises the impact assessment processes that are currently being conducted for the proposed project.

**Table 3: Current assessment processes**

<b>Legislation (e.g. NEMA, MPRDA, etc.)</b>	<b>Current phase of assessment process (e.g. Scoping, EIA, etc.)</b>	<b>Authorities who has / will receive information</b>	<b>Capacity of Authorities</b>
NEMA	Pre-application	Rural Enterprise and Industrial Development (REID)	Licencing Authority
NHRA	NID	South African Heritage Resources Agency (SAHRA)	Commenting
	NID	North West Provincial Heritage Resources Authority (NW-PHRA)	Noting <sup>1</sup>

These assessments are required in terms of legislated and / or regulated activities outlined in Sections 2.1 to 2.3 below.

### 2.1 EIA Regulations listed activities

The proposed development will include the following activities listed in the EIA Regulations, which generally require impact assessments:

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<sup>1</sup> The NID will be submitted to the NW-PHRA via the South African Heritage Resources Information System (SAHRIS) for noting only, as no heritage resources will be impacted on that fall within the NW-PHRA's competency, i.e. NHRA Section 34 protected structures.



**Table 4: Identified listed activities**

<b>NEMA Activity No.</b>	<b>NHRA Trigger</b>	<b>Description</b>	<b>Expected duration/phase</b>
Activity 2 of GN R 983 <sup>2</sup>	38(1)(e)	The development and related operation of facilities or infrastructure for the generation of electricity from a non-renewable resource where: (i) The electricity output is more than 10 megawatts but less than 20 megawatts; or (ii) The output is 10 megawatts or less but the total extent of the facility covers an area in excess of 1 ha.	Construction and operation
Activity 9 of GN R 983 <sup>3</sup>	38(1)(e)	The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water.	Construction and operation
Activity 11 of GN R 983 <sup>4</sup>	38(1)(e)	The development of facilities or infrastructure for the transmission and distribution of electricity – (i) Outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.	Construction and operation

<sup>2</sup> As amended by GN R 327 (Listing Notice 1)

<sup>3</sup> As amended by GN R 327 (Listing Notice 1)

<sup>4</sup> As amended by GN R 327 (Listing Notice 1)

NEMA Activity No.	NHRA Trigger	Description	Expected duration/phase
Activity 12 of GN R 983 <sup>5</sup>	38(1)(e)	The development of: <ul style="list-style-type: none"> <li>(i) Dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</li> <li>(ii) Infrastructure or structures with a physical footprint of 100 square metres or more;</li> </ul> Where such development occurs – <ul style="list-style-type: none"> <li>(a) Within a watercourse;</li> <li>(b) In front of a development setback; or</li> <li>(c) If no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</li> </ul>	Construction and operation
Activity 14 of GN R 983 <sup>6</sup>	38(1)(e)	The development and related operation of facilities or infrastructure for the storage, or for the storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more, but not exceeding 500 cubic metres.	Operation
Activity 19 of GN R 983 <sup>7</sup>	38(1)(e)	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles of rock of more than 10 cubic metres from a watercourse.	Construction.

<sup>5</sup> As amended by GN R 327 (Listing Notice 1)

<sup>6</sup> As amended by GN R 327 (Listing Notice 1)

<sup>7</sup> As amended by GN R 327 (Listing Notice 1)

NEMA Activity No.	NHRA Trigger	Description	Expected duration/phase
Activity 31 of GN R 983 <sup>8</sup>	38(1)(e)	The decommission of existing facilities, structures or infrastructure for – (v) Any activity regardless of the time the activity was commenced with, where such activity: (a): Is similarly listed to an activity [that is currently a listed activity]] and (b) Is still in operation or development is still in progress.	Operation, and construction of new helipad and decommissioning of existing helipad
Activity 46 of GN R 983 <sup>9</sup>	38(1)(e)	The expansion and related operation of infrastructure for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes, where the existing infrastructure- (i) Has an internal diameter of 0.36 metres or more; or (ii) Has a peak throughput of 120 litres per second or more; and (a) Where the facility or infrastructure is expanded by more than 1 000 metres in length; or (b) Where the throughput capacity of the facility or infrastructure will be increased by 10% or more.	Construction and operation

<sup>8</sup> As amended by GN R 327 (Listing Notice 1)

<sup>9</sup> As amended by GN R 327 (Listing Notice 1)

<b>NEMA Activity No.</b>	<b>NHRA Trigger</b>	<b>Description</b>	<b>Expected duration/phase</b>
Activity 48 of GN R 983 <sup>10</sup>	38(1)(e)	<p>The expansion of:</p> <ul style="list-style-type: none"> <li>(i) Infrastructure or structures where the physical footprint is expanded by 100 square meters or more; or</li> <li>(ii) Dams and weirs where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more;</li> </ul> <p>Where such expansion occurs:</p> <ul style="list-style-type: none"> <li>(a) Within a watercourse;</li> <li>(b) In front of a development setback; or</li> <li>(c) If no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</li> </ul>	Construction
Activity 15 of GN R 984 <sup>11</sup>	38(1)(c)(i)	The clearance of an area of 20 ha or more of indigenous vegetation.	Construction
Activity 2 of GN R 985 <sup>12</sup>	38(1)(e)	The Development of reservoirs (excluding dams) with a capacity of more than 250 cubic metres in the North West Province.	Construction
Activity 4 of GN R 985 <sup>13</sup>	38(1)(e)	<p>The development of a road wider than 4 metres with a reserve less than 13.5 metres in the North West Province:</p> <ul style="list-style-type: none"> <li>(i) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from a biosphere reserve.</li> </ul>	Construction

<sup>10</sup> As amended by GN R 327 (Listing Notice 1)

<sup>11</sup> As amended by GN R 324 (Listing Notice 2)

<sup>12</sup> As amended by GN R 324 (Listing Notice 3)

<sup>13</sup> As amended by GN R 324 (Listing Notice 3)

NEMA Activity No.	NHRA Trigger	Description	Expected duration/phase
Activity 6 of GN R 985 <sup>14</sup>	38(1)(e)	The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more in North West: <ul style="list-style-type: none"> <li>(i) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority;</li> <li>(ii) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the NEMA and as adopted by the competent authority; or</li> <li>(iii) Areas within a watercourse or wetlands, or within 100 metres from the edge of a watercourse or wetland.</li> </ul>	Construction
Activity 10 of GN R 985 <sup>15</sup>	38(1)(e)	The development and related operation of facilities or infrastructure for the storage, or for the storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 cubic metres or more, but not exceeding 80 cubic metres in North West, in Critical Biodiversity Areas, sensitive areas or within 100 m from the edge of a watercourse or wetland.	Construction and operation.

<sup>14</sup> As amended by GN R 324 (Listing Notice 3)

<sup>15</sup> As amended by GN R 324 (Listing Notice 3)

<b>NEMA Activity No.</b>	<b>NHRA Trigger</b>	<b>Description</b>	<b>Expected duration/phase</b>
Activity 12 of GN R 985 <sup>16</sup>	38(1)(c)(i)	The clearance of an area of 300 square metres or more of indigenous vegetation in North West:  (i) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority; (ii) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority; or (iii) Areas within a watercourse or wetland, or within 100 metres from the edge of a watercourse or wetland.	Construction
Activity 16 of GN R 985 <sup>17</sup>	38(1)(e)	The expansion or reservoirs excluding dams, where the capacity will be increased by no more than 250 cubic metres, in North West.	Construction and operation
Activity 17 of GN R 985 <sup>18</sup>	38(1)(e)	The expansion of a resort, lodge, hotel, tourism or hospitality facilities where the development footprint will be expanded and the expanded facility can accommodate an additional 15 people or more, in North West:  (i) World Heritage Sites; core of biosphere reserves or sites or areas identified in terms of an international convention; (ii) A protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation; (iii) All Heritage Sites proclaimed in terms of the NHRA.	Construction

<sup>16</sup> As amended by GN R 324 (Listing Notice 3)

<sup>17</sup> As amended by GN R 324 (Listing Notice 3)

<sup>18</sup> As amended by GN R 324 (Listing Notice 3)

NEMA Activity No.	NHRA Trigger	Description	Expected duration/phase
Activity 18 of GN R 985 <sup>19</sup>	38(1)(e)	The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre in the northwest: <ul style="list-style-type: none"> <li>(i) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from a biosphere reserve;</li> <li>(ii) Areas within a watercourse or wetland, or within 100 metres from the edge of a watercourse or wetland.</li> </ul>	Construction

<sup>19</sup> As amended by GN R 324 (Listing Notice 3)



## 2.2 NHRA Section 38(1) activities

The proposed development will include the following activities listed in Section 38(1) of the NHRA, which generally require heritage assessments to be undertaken.

**Table 5: NHRA Section 38 triggers**

		NHRA Section 38 (1) Activities / Triggers	Summary description (e.g. 500 m conveyor belt, open cast pit, etc.)
<input checked="" type="checkbox"/>	a	Any linear development or barrier >300 m	The proposed linear developments described in Section 1.1 collectively exceed 300 m.
<input type="checkbox"/>	b	Any bridge or similar structure >50 m	
<input checked="" type="checkbox"/>	c	Any development or activity that will change the character of a site:	
<input checked="" type="checkbox"/>	i	≥5 000m <sup>2</sup> in extent	The proposed construction activities will require the clearing of indigenous vegetation. This will collectively exceed 5 000 m <sup>2</sup> .
<input type="checkbox"/>	ii	Involving ≥3 existing erven/ subdivisions	-
<input type="checkbox"/>	iii	Involving ≥3 or more erven/ divisions consolidated within past 5 years.	-
<input type="checkbox"/>	d	Rezoning of a site ≥10 000m <sup>2</sup> in extent.	-
<input checked="" type="checkbox"/>	e	Other triggers, e.g.: in terms of other legislation, (i.e.: National Environment Management Act, etc.)	NEMA

## 2.3 Identified / known heritage resources and potential impacts

Certain categories of heritage resources, if identified or existing, generally require heritage assessments to be conducted before any development may take place. These categories may also be formally or generally protected in terms of the NHRA. Table 6 presents heritage identified in the region surrounding the Sun City Resort Complex.

**Table 6: Identified heritage resources in terms of Section 3 of the NHRA**

Section	Description
<input type="checkbox"/>	<b>Places, buildings, structures and equipment of cultural significance</b>
	Description of resource: None identified
	Potential impact: None.





	Section	Description
<input type="checkbox"/>	<b>3(2)(b)</b>	<p><b>Places to which oral traditions are attached or which are associated with living heritage.</b></p> <p>Description of resource: None identified</p> <p>Potential impact: None</p>
<input checked="" type="checkbox"/>	<b>3(2)(c)</b>	<p><b>Historical settlements and townscapes</b></p> <p>Description of resource: None identified.</p> <p>Potential impact: None</p>
<input type="checkbox"/>	<b>3(2)(d)</b>	<p><b>Landscapes and natural features of cultural significance</b></p> <p>Description of resource: None identified</p> <p>Potential impact: None</p>
<input type="checkbox"/>	<b>3(2)(e)</b>	<p><b>Geological resources of scientific or cultural importance</b></p> <p>Description of resource: None identified</p> <p>Potential impact: None</p>
<input checked="" type="checkbox"/>	<b>3(2)(f)</b>	<p><b>Archaeology and/or palaeontology (<i>Including archaeological sites and material, fossils, rock art, battlefields &amp; wrecks</i>)</b></p> <p>Description of resource: The geology underlying the Project area is not palaeontologically sensitive. Archaeologically, a Late Farming Community (LFC) settlement, potentially <i>Itlholanoga</i>, has been identified within the Project Area, and was assessed during a Heritage Basic Assessment Process undertaken by Digby Wells (Case ID 12749). Heritage resources associated with the LFC are relatively common in the area surrounding the Project Area. Heritage resources associated with Farming Community in general (i.e. 'Iron Age') and the historical built environment have been recorded in previously completed assessments in the region, but are not as prolific as the LFC material. 'Stone Age' archaeological material has also been reported but is relatively rare in the region.</p> <p>Potential impact: There is no palaeontological impact envisioned. Potentially, the LFC sites that have been identified within the Project area may be damaged and/or destroyed. There is a proposed pipeline which will run through several LFC sites and the proposed reservoirs present a risk of damaging the large LFC settlement on Telkom Hill.</p>
<input checked="" type="checkbox"/>	<b>3(2)(g)</b>	<p><b>Graves and burial grounds (<i>e.g. ancestral graves, graves of victims of conflict, historical graves &amp; cemeteries</i>)</b></p> <p>Description of resource: None identified within the Project Area; however some burial grounds and graves have been recorded in the surrounding area.</p> <p>Potential impact: None identified.</p>



	<b>Section</b>	<b>Description</b>
<input type="checkbox"/>	<b>3(2)(h)</b>	<b>Other human remains</b>
		Description of resource: None identified
		Potential impact: None
<input type="checkbox"/>	<b>3(2)(i)</b>	<b>Sites of significance relating to the history of slavery in South Africa</b>
		Description of resource: None identified
		Potential impact: None
<input type="checkbox"/>	<b>3(2)(j)</b>	<b>Movable objects</b>
		Description of resource: None identified
		Potential impact: None

### 3 Illustrative material

Illustrative material is provided in Appendix A. The illustrative material demonstrates the general Project locality.



## 4 Recommendation

A summary and motivation of the specialist recommendations is provided in Table 7:

**Table 7: Specialist heritage recommendations**

<b>Is a Heritage Impact Assessment required?</b>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>If NO, provide motivation:</b> N/A			
<b>If YES, provide suggested components that may be required or undertaken during HIA.</b>			
<input checked="" type="checkbox"/>	Archaeology	<input type="checkbox"/>	Architecture
<input type="checkbox"/>	Built Environment	<input type="checkbox"/>	Burial Grounds and Graves
<input type="checkbox"/>	Palaeontology	<input type="checkbox"/>	Public Participation
<input type="checkbox"/>	Townscapes	<input type="checkbox"/>	Visual Impact
<input type="checkbox"/>	Other:		
<b>Recommendation made by:</b>			
<b>Name:</b> Shannon Hardwick		<b>Name:</b> Justin du Piesanie	
<b>Capacity:</b> Assistant Heritage Resources Unit Consultant		<b>Capacity:</b> Divisional Manager: Social and Heritage Services	

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## Appendix A: Maps and Plans

