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Att: Compliance Office

**Re: Renewal of archaeological permits for the proposed Mamelodi to Vlakfontein pipeline.**

The Vhubvo Consultancy Cc has been appointed to help facilitate the mitigation of archaeological resources that will be impacted upon by the proposed development of the R5 water pipeline between Vlakfontein in Ekurhuleni and Mamelodi in Tshwane. This proposed development, which is undertaken by Rand Water and is divided into three phases, is approaching implementation stage. Construction will take place within the existing Rand Water servitudes.

**Background**

As part of environmental authorisation, a Phase 1 Heritage Impact Assessment was undertaken by Archaeology Africa Cc who had been appointed by Africon (Pty) Ltd. Three areas were not surveyed altogether. These were: the land owned by the Department of Intelligence on which the Musanda Complex is located, Woodhill Golf Estate, and Silver Lakes Golf Estate. Ten archaeological sites were located within the Phase 3 of the proposed project. These were: three Late Iron Age settlements (Sites P3- 1, P3-2 and P3-5), two possible graves (Sites P3-3 and P3-4), one historic road (Site P3-6), one historic wall (Site P3-7), and three Late Iron Age or Historic sites (Site P3-8, P3-9 and P2-1).

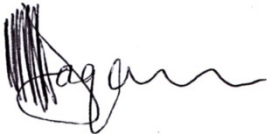
Of these ten sites, four were identified to be along the route of the proposed pipeline. The four archaeological sites in question are, namely, Late Iron Age stonewalled site on the farm Zwartkoppies 364 JR (P3-1), Late Iron Age stonewalled site on the farm Zwartkoppies 364 JR (P3-2), Historic stonewall on the farm Zwartkoppies 364 JR (P3-7), and Late Iron Age stonewalled site on the farm Zwartkoppies 364 JR (P3-10). As part of mitigation efforts, Mr Polka Birkholtz of PGS Heritage and Grave Relocation Consultants was granted archaeological permits for the destruction of these four sites (P3-1, P3-2, P3-7, and P3-10), all located on the farm Zwartkoppies 364 JR, east of Pretoria, Gauteng Province. As the responsible heritage au-

thority, the South African Heritage Resources Agency (SAHRA) duly approved these permits and they were given on 05 May 2016 (Ref. no.: 9-2-228-0001). These archaeological permits were valid from 01/05/2016 to 30/04/2017.

Following delays with the procurement processes, the project could not go ahead as planned. However, these have now been addressed. Nsovo has since appointed Vhubvo Consultancy Cc as the heritage specialists for the pipeline project. It is thus requested that the four archaeological permits be renewed for another year, and the permit holder be changed from Mr Mr Polke Birkholtz of PGS Heritage and Grave Relocation Consultants to Mr Munyadziwa Magoma of Vhubvo Consultancy Cc.

Attached is the project proposal submitted by Vhubvo Consultancy Cc to appropriately advise SAHRA, in its review of the request to renew permits previously approved, on how mitigation will be undertaken.

Yours faithfully,



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Munyadziwa Magoma

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for Vhubvo Archaeo-Heritage Consultants Cc

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### **Executive Summary**

Request is hereby made for the permits (Permit ID: 2230, 2231, 2235 and 2237) previously issued by SAHRA to be renewed. These permits were issued in relation to the proposed Mamelodi to Vlakfontein. An archaeological survey conducted during the Phase 1 Heritage Impact Assessment identified ten archaeological and historical sites. Of these sites, four were found to be directly affected by the proposed pipeline development even after alignments had been effected. The permits previously applied for were in relation to Section 35(4) of the National Heritage Resources Act (no. 25 of 1999) provides that “no person may, without a permit issued by the responsible heritage resources authority, destroy damage, excavate, alter, deface or otherwise disturb any archaeological site without a permit issued by the heritage resources authority.”

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## **1. Introduction and Rationale**

Vhubvo Consultancy was appointed by Nsovo to facilitate the renewal of Permit ID: 2230, 2231, 2235 and 2237 as well as to ensure that mitigation procedures for all the affected sites are appropriately adhered to as per permit conditions. A Phase I Cultural Heritage Impact Assessment for the proposed pipeline was conducted in May of 2008. During survey, several archaeological and grave sites were discovered on the proposed area. As a result, the pipeline was re-aligned so as to lessen the threat to archaeological resources. However, despite the re-alignment, ten stone walled sites will still be affected. In contemplation of the nature of the proposal, as well as the significance of the sites which are rated as being Medium-Low, it was recommended that some portions of the stone wall enclosures, circular stone enclosures and stone heaps be removed during construction of the pipeline and be reconstructed after installation of the pipeline.

## **2. Site Location and Description**

The proposed project entails installation of the Vlakfontein (Benoni) to Mamelodi (Tshwane) water supply pipeline within the existing servitudes. The four sites in question are P3-1, P3-2, P3-7 and P3-10. These sites are located on the farm Zwartkoppies 364JR, east of Pretoria, Gauteng Province. The proposed development will take place within the existing Rand Water servitudes. The four archaeological and historical stone walled sites have suffered damage over the years, with the stone walling collapsing. Restoration after the construction of the pipeline was recommended rather than total destruction of the stone walling.

## **3. Objective of the Project**

The main objective of this proposal is to reconstruct the stone walling after it would have been damaged following construction of the pipeline. Thus, the reconstruction will entail the following:

- Removal of a portion of the wall to accommodate the width of the pipeline plus an offset distance.
- Reconstruct the portion of the wall that would have been damaged for the pipeline construction.

The main objective is to ensure that reconstruction is authentic, thus returning the landscape to its current state before the pipeline activities are undertaken.

## **4. Methodology and Approach**

The reconstruction will be conducted following international archaeological best practice underpinned by local regulation and guidelines pertaining to the National Heritage Resources Act (no. 25 of 1999). The reconstruction and documentations will be co-managed by the applicants (Mr. Munyadziwa Magoma, Dr. Ndukuyakhe Ndlovu, and Mr. Alvord Nhundu). To ensure that the reconstruction project is a success, this Phase 2 Cultural Resource Management program will document (evaluate, mapping, and photograph the stone walling sites) before construction activities are undertaken. This valuable record will inform reconstruction of the stone walling after the pipeline project would have been completed (see Maggs 1976; Collet 1982; Ndoro 1995). The documentation of the sites will entirely be focused on understanding initial layout

pattern to safeguard the integrity of reconstruction activities. Generally, the section of the reconstructed stone wall will entail the following:

- Match the style and the form of the existing wall;
- Reconstruction will be undertaken using the original stone removed before construction activities; and
- Integrity of the existing stone walling will be retained.

It is always important to maintain the fabric, material, design and workmanship of the site so that we do not temper with the sacred and spiritual value of the site (Ndoro 1995). This will be achieved through documentation and drawing a detailed site layout plan before the pipeline construction activities are initiated. Archaeologists shall be on site during construction activities to undertake monitoring.

## **5. Timeframe**

The project will resume immediately after receiving renewal of the permit from SAHRA. As indicated earlier, adequate documentation will be undertaken prior to construction activities being effected. Thereafter, the stone walling will not be immediately reconstructed. Instead, an allowance of at least two months will be allowed for to ensure that the soil surface has stabilised and firm before stone walling can be reconstructed again. This is important in safeguarding integrity of the work undertaken.

## **6. Conclusions**

The mitigation activities undertaken under the renewed permits from the SAHRA will be conducted in line with the National Heritage Resource Act (no. 25 of 1999). A final permit report shall be submitted to SAHRA. In complying with heritage regulations, the report shall provide a detailed insight into the methods implemented in executing the recording, destruction, and reconstruction of the stone walling sites as a result of the proposed water pipeline. It is thus requested that SAHRA timeously issues the renewed permits to allow for mitigation to be carried out accordingly.

## References

- Birkholtz, P.D. 2008. Phase I Heritage Impact Assessment: Proposed pipeline between Vlakfontein and Mamelodi Tshwane, Kungwini and Ekurhuleni Municipalities, Gauteng Province. Unpublished document: Archaeology Africa Cc.
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