

Date: 2013-07-08
SAHRA Ref: 9/2/228/0001

**Attention: Heritage Officer: Archaeology
South African Heritage Resource
Agency
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Dear Mr Salomon

**Motivation for Exemption from Heritage Assessment:
24G Application for Rectification, Holfontein Stockpile**

Synergistics Environmental Services (Pty) Ltd is assisting EnviroServ Waste Management Limited with a 24G application for rectification of the Holfontein Stockpile which was commenced without environmental authorisation. The application is being evaluated by the Gauteng Department of Agriculture and Rural Development (S24G/03/12-13/0241). One of the GDARD requirements is that written comment be obtained from South African Heritage Resource Agency (SAHRA) if Section 38 of the National Heritage Resources Act, 1999 (25 of 1999) is applicable to the activities.

Synergistics uploaded a notification and information on the Holfontein Stockpile to the SAHRA website on 27 May 2013. SAHRA has responded in a letter dated 4 July 2013 in which SAHRA required that a Heritage Impact Assessment (HIA) be undertaken as part of the rectification process. Such assessment should include phase 1 for the archaeological component and any other applicable heritage component. Appropriate phase 2 mitigation should be done if required. SAHRA advocated that the quickest process to follow for the archaeological component would be to contract an accredited specialist to provide a Phase 1 Archaeological Impact Assessment Report. SAHRA indicated that this must be done before any large development takes place.

On the basis of the information provided for the Holfontein Stockpile, SAHRA further advised that the most appropriate approach may be for the heritage specialist to send a letter to SAHRA to indicate that there is no necessity for any further assessment. SAHRA may consider granting exemption from further heritage assessments.

Synergistics hereby submits a motivation to SAHRA for exemption from any further heritage assessment for the Holfontein Stockpile.

Historically, as is visible in the series of Google Earth pictures (2002 to 2012) below, the site was agricultural land comprising natural grassland. No built structures or infrastructure of any kind was visible. Trenches that were dug across the area to drain the wet soils are visible. There is also evidence that sections of the site have been mowed at various times.



Site in 2002



Site in 2004



Site in May 2012



Site in August 2012

The following information has relevance to the motivation for exemption.

- Synergistics personnel have been to the Holfontein Stockpile site and have examined the site and the immediate surrounds.

- The Holfontein Stockpile comprises four (4) heaps of soil and clay material that was excavated from the Holfontein Waste Disposal Site during construction there.
- The 4 stockpiles comprise soil and clay material of different grades and are separate, but contiguous.
- The Holfontein Stockpiles occupy a total area of 3.65 ha. This is the maximum extent of the stockpile. Corner points are as follows:
 - A - 26.142267; 28.514458
 - B - 26.143500; 28.515525
 - C - 26.144606; 28.514217
 - D - 26.145539; 28.514581
 - E - 26.145164; 28.515725
- The soil material has been placed on surface (i.e. natural ground level) in heaps that are up to 6 m in height.
- In the stockpile footprint, no natural ground is visible.
- There is no evidence of any built structures or infrastructure either on-site or in the historical photographs.



Topsoil Stockpile viewed from the North



Western edge of the stockpiles (viewed from the North)



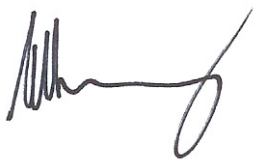
Clay stockpile viewed from the South

A heritage specialist visiting the site would also observe large heaps of soil and clay material with no other natural or historical features (if present) being visible. Thus the information provided by Synergistics is equivalent to that which an accredited specialist would provide to SAHRA.

Given that there is no evidence of any heritage resources on site, and a very low likelihood of further assessment detecting any heritage resource on site I hereby request that SAHRA grant exemption from further heritage assessments in respect of the Holfontein Stockpile.

Please do not hesitate to contact the undersigned should you need additional clarification.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Matthew Hemming', with a stylized, flowing script.

Matthew Hemming
Environmental Assessment Practitioner