

Letter of Recommendation for Exemption:

**PROPOSED DEVELOPMENT OF EQUESTRIA EXTENSION 269 ON HOLDING 213,
WILLOW GLEN AGRICULTURAL HOLDINGS, CITY OF TSHWANE DISTRICT
MUNICIPALITY, GAUTENG PROVINCE**

Prepared for:

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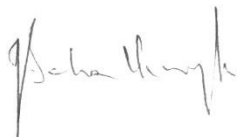
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Declaration:

I, J.A. van Schalkwyk, declare that:

- I am suitably qualified and accredited to act as independent specialist in this application.
- I do not have any financial or personal interest in the proposed development, nor its developers or any of their subsidiaries, apart from the provision of heritage assessment and management services, for which a fair numeration is charged.
- The work was conducted in an objective manner and any circumstances that might have compromised this have been reported.



J A van Schalkwyk
Heritage Consultant
September 2017



EXECUTIVE SUMMARY**Letter of Recommendation for Exemption:
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It is proposed to develop a township, to be called Equestria Extension 269 on Holding 213, Willow Glen Agricultural Holdings in the eastern suburbs of Pretoria.

In accordance with Section 38 of the NHRA, an independent heritage consultant was appointed by J Paul van Wyk Urban Economist to review the heritage potential of the site and draft a Letter of Recommendation of Exemption.

The cultural landscape qualities of the region is made up of a pre-colonial element consisting of very limited Stone Age and Iron Age occupation, as well as a much later colonial (farmer) component, which eventually gave rise to an urban component.

After reviewing the region and the site specifically, the following conclusions can be made:

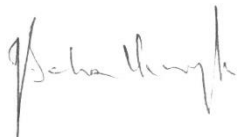
- Based on available published and unpublished resources, it can be stated with a high degree of certainty that very few sites, features or objects of cultural significance are known to occur in the larger region surrounding the study area. This has always been an area of low human occupation prior to the intensive urbanisation that took place during the past 40 years.
- No known sites, features or objects of cultural significance are known to exist in the study area.
- The fact that the area has been used for farming and currently as small holding, would have had a negative impact on heritage features.

Reasoned opinion as to whether the proposed activity should be authorised:

- From a heritage point of view it is concluded that a full heritage impact assessment of the site is not required and it is recommended that a Letter of Recommendation for Exemption is issued by SAHRA for the proposed development be allowed to continue.

Conditions for inclusion in the environmental authorisation:

- Should archaeological sites or graves be exposed during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.



J A van Schalkwyk
Heritage Consultant
September 2017

TECHNICAL SUMMARY

Project description	
Description	Township development
Project name	Equestria Extension 269

Applicant
The Jurie and Cirkia Human Trust, P O Box 71426, The Willows, 0041

Environmental assessors
J Paul Van Wyk Urban Economist
Ms O Schumacher-Malan

Property details						
Province	Gauteng					
Magisterial district	Pretoria					
District municipality	City of Tshwane					
Topo-cadastral map	2528CD					
Farm name	The Willows 340JR					
Closest town	Pretoria					
Coordinates	Centre point					
	No	Latitude	Longitude	No	Latitude	Longitude
	1	-25.77364	28.34703			

Development criteria in terms of Section 38(1) of the NHR Act	Yes/No
Construction of road, wall, power line, pipeline, canal or other linear form of development or barrier exceeding 300m in length	No
Construction of bridge or similar structure exceeding 50m in length	No
Development exceeding 5000 sq m	Yes
Development involving three or more existing erven or subdivisions	No
Development involving three or more erven or divisions that have been consolidated within past five years	No
Rezoning of site exceeding 10 000 sq m	No
Any other development category, public open space, squares, parks, recreation grounds	No

Land use	
Previous land use	Vacant
Current land use	Small holding

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GLOSSARY OF TERMS AND ABBREVIATIONS

TERMS

Stone Age: The first and longest part of human history is the Stone Age, which began with the appearance of early humans between 3-2 million years ago. Stone Age people were hunters, gatherers and scavengers who did not live in permanently settled communities. Their stone tools preserve well and are found in most places in South Africa and elsewhere.

Early Stone Age	2 000 000 - 150 000 Before Present
Middle Stone Age	150 000 - 30 000 BP
Later Stone Age	30 000 - until c. AD 200

Iron Age: Period covering the last 1800 years, when new people brought a new way of life to southern Africa. They established settled villages, cultivated domestic crops such as sorghum, millet and beans, and they herded cattle as well as sheep and goats. As they produced their own iron tools, archaeologists call this the Iron Age.

Early Iron Age	AD 200 - AD 900
Middle Iron Age	AD 900 - AD 1300
Later Iron Age	AD 1300 - AD 1830

Historical Period: Since the arrival of the white settlers - c. AD 1840 - in this part of the country.

Cumulative impacts: "Cumulative Impact", in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

Mitigation, means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible.

ABBREVIATIONS

ADRC	Archaeological Data Recording Centre
ASAPA	Association of Southern African Professional Archaeologists
CS-G	Chief Surveyor-General
EIA	Early Iron Age
ESA	Early Stone Age
LIA	Late Iron Age
LSA	Later Stone Age
HIA	Heritage Impact Assessment
MSA	Middle Stone Age
NASA	National Archives of South Africa
NHRA	National Heritage Resources Act
PHRA	Provincial Heritage Resources Agency
SAHRA	South African Heritage Resources Agency

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1. INTRODUCTION

It is proposed to develop a township, to be called Equestria Extension 269 on Holding 213, Willow Glen Agricultural Holdings in the eastern suburbs of Pretoria.

South Africa's heritage resources, also described as the 'national estate', comprise a wide range of sites, features, objects and beliefs. However, according to Section 27(18) of the National Heritage Resources Act (NHRA), No. 25 of 1999, no person may destroy, damage, deface, excavate, alter, remove from its original position, subdivide or change the planning status of any heritage site without a permit issued by the heritage resources authority responsible for the protection of such site.

In accordance with Section 38 of the NHRA, an independent heritage consultant was appointed by J Paul van Wyk Urban Economist to review the heritage potential of the site and draft a Letter of Recommendation of Exemption.

This report forms part of the Environmental Impact Assessment (EIA) as required by the EIA Regulations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as amended and is intended for submission to the South African Heritage Resources Agency (SAHRA).

2. TERMS OF REFERENCE

2.1 Scope of work

The aim of this study is to determine if any sites, features or objects of cultural heritage significance occur within the boundaries of the area where the development is to take place. This includes:

- Conducting a desk-top investigation of the area;

The objectives were to:

- Identify possible archaeological, cultural and historic sites within the proposed development areas;
- Evaluate the potential impacts of construction, operation and maintenance of the proposed development on archaeological, cultural and historical resources;
- Recommend mitigation measures to ameliorate any negative impacts on areas of archaeological, cultural or historical importance.

2.2 Limitations

The investigation has been influenced by the following factors:

- It is assumed that the description of the proposed project, provided by the client, is accurate.
- No subsurface investigation (i.e. excavations or sampling) were undertaken, since a permit from SAHRA is required for such activities.

- It is assumed that the public consultation process undertaken as part of the Environmental Impact Assessment (EIA) is sufficient and that it does not have to be repeated as part of the heritage impact assessment.
- The unpredictability of buried archaeological remains.
- This report does not consider the palaeontological potential of the site.

3. LEGISLATIVE FRAMEWORK

The HIA is governed by national legislation and standards and International Best Practise. These include:

- South African Legislation
 - National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) – see Appendix 4 for more detail on this Act
 - Mineral and Petroleum Resources Development Act, 2002 (Act No. 22 of 2002) (MPRDA);
 - National Environmental Management Act 1998 (Act No. 107 of 1998) (NEMA); and
 - National Water Act, 1998 (Act No. 36 of 1998) (NWA).
- Standards and Regulations
 - South African Heritage Resources Agency (SAHRA) Minimum Standards;
 - Association of Southern African Professional Archaeologists (ASAPA) Constitution and Code of Ethics;
 - Anthropological Association of Southern Africa Constitution and Code of Ethics.
- International Best Practise and Guidelines
 - ICOMOS Standards (Guidance on Heritage Impact Assessments for Cultural World Heritage Properties); and
 - The UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage (1972).

4. HERITAGE RESOURCES

4.1 The National Estate

The NHRA (No. 25 of 1999) defines the heritage resources of South Africa which are of cultural significance or other special value for the present community and for future generations that must be considered part of the national estate to include:

- places, buildings, structures and equipment of cultural significance;
- places to which oral traditions are attached or which are associated with living heritage;
- historical settlements and townscapes;
- landscapes and natural features of cultural significance;
- geological sites of scientific or cultural importance;
- archaeological and palaeontological sites;
- graves and burial grounds, including-
 - ancestral graves;
 - royal graves and graves of traditional leaders;
 - graves of victims of conflict;
 - graves of individuals designated by the Minister by notice in the Gazette;
 - historical graves and cemeteries; and

- other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
- sites of significance relating to the history of slavery in South Africa;
- movable objects, including-
 - objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
 - objects to which oral traditions are attached or which are associated with living heritage;
 - ethnographic art and objects;
 - military objects;
 - objects of decorative or fine art;
 - objects of scientific or technological interest; and
 - books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996).

4.2 Cultural significance

In the NHRA, Section 2 (vi), it is stated that “cultural significance” means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance. This is determined in relation to a site or feature’s uniqueness, condition of preservation and research potential.

According to Section 3(3) of the NHRA, a place or object is to be considered part of the national estate if it has cultural significance or other special value because of

- its importance in the community, or pattern of South Africa's history;
- its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa; and
- sites of significance relating to the history of slavery in South Africa.

A matrix was developed whereby the above criteria were applied for the determination of the significance of each identified site (see Appendix 3). This allowed some form of control over the application of similar values for similar identified sites.

5. STUDY APPROACH AND METHODOLOGY

5.1 Extent of the Study

This survey and impact assessment covers the area as presented in Section 7 below and illustrated in Figures 2 & 3.

5.2 Methodology

5.2.1 Survey of the literature

A survey of the relevant literature was conducted with the aim of reviewing the previous research done and determining the potential of the area. In this regard, various anthropological, archaeological and historical sources were consulted – see list of references in Section 11.

- Information on events, sites and features in the larger region were obtained from these sources.

5.2.2 Data bases

The *Heritage Atlas Database*, various SAHRA databases, the *Environmental Potential Atlas*, the *Chief Surveyor General* and the *National Archives of South Africa* were consulted.

- Database surveys produced a number of sites located in the larger region of the proposed development, but none in the study area specifically..

5.2.3 Other sources

Aerial photographs and topocadastral and other maps were also studied - see the list of references below.

- Information of a very general nature were obtained from these sources

5.2.4 Interviews

- None possible.

The results of the above investigation are summarised in Table 1 below – see list of references in Section 11.

Table 1: Pre-Feasibility Assessment

Category	Period	Probability	Reference
Early hominin	Pliocene – Lower Pleistocene		
	Early hominin	None	
Stone Age	Lower Pleistocene – Holocene		
	Early Stone Age	Low	
	Middle Stone Age	Low	
	Later Stone Age	Low	
	Rock Art	None	
Iron Age	Holocene		
	Early Iron Age	None	
	Middle Iron Age	None	
	Later Iron Age	Low	Van Schalkwyk (1998); Van Schalkwyk, Pelsler & Van Vuuren (1996)
Colonial period	Holocene		
	Contact period	Low	Horn (1998)
	Recent history	Medium	Van Schalkwyk (1998, 2017)
	Industrial heritage	None	

6. SITE SIGNIFICANCE AND ASSESSMENT

6.1 Heritage assessment criteria and grading

The National Heritage Resources Act, Act no. 25 of 1999, stipulates the assessment criteria and grading of heritage sites. The following grading categories are distinguished in Section 7 of the Act:

Table 2: Site Grading System.

SAHRA Cultural Heritage Site Significance			
Field Rating	Grade	Significance	Recommended Mitigation
National Significance	Grade I	High significance	Conservation by SAHRA, national site nomination, mention any relevant international ranking. No alteration whatsoever without permit from SAHRA
Provincial Significance	Grade II	High significance	Conservation by provincial heritage authority, provincial site nomination. No alteration whatsoever without permit from provincial heritage authority.
Local Significance	Grade III-A	High significance	Conservation by local authority, no alteration whatsoever without permit from provincial heritage authority. Mitigation as part of development process not advised.
Local Significance	Grade III-B	High significance	Conservation by local authority, no external alteration without permit from provincial heritage authority. Could be mitigated and (part) retained as heritage register site.
Generally Protected A	Grade IV-A	High/medium significance	Conservation by local authority. Site should be mitigated before destruction. Destruction permit required from provincial heritage authority.
Generally Protected B	Grade IV-B	Medium significance	Conservation by local authority. Site should be recorded before destruction. Destruction permit required from provincial heritage authority.
Generally Protected C	Grade IV-C	Low significance	Conservation by local authority. Site has been sufficiently recorded in the Phase 1 HIA. It requires no further recording before destruction. Destruction permit required from provincial heritage authority.

The occurrence of sites with a Grade I significance will demand that the development activities be drastically altered in order to retain these sites in their original state. For Grade II, III and IV sites, the applicable of mitigation measures would allow the development activities to continue.

6.2 Methodology for the assessment of potential impacts

All impacts identified during the EIA stage of the study will be classified in terms of their significance. Issues were assessed in terms of the following criteria:

- The **nature**, a description of what causes the effect, what will be affected and how it will be affected;
- The physical **extent**, wherein it is indicated whether:
 - 1 - the impact will be limited to the site;
 - 2 - the impact will be limited to the local area;
 - 3 - the impact will be limited to the region;
 - 4 - the impact will be national; or
 - 5 - the impact will be international;
- The **duration**, wherein it is indicated whether the lifetime of the impact will be:
 - 1 - of a very short duration (0–1 years);
 - 2 - of a short duration (2-5 years);
 - 3 - medium-term (5–15 years);
 - 4 - long term (> 15 years); or

- 5 - permanent;
- The **magnitude** of impact, quantified on a scale from 0-10, where a score is assigned:
 - 0 - small and will have no effect;
 - 2 - minor and will not result in an impact;
 - 4 - low and will cause a slight impact;
 - 6 - moderate and will result in processes continuing but in a modified way;
 - 8 – high, (processes are altered to the extent that they temporarily cease); or
 - 10 - very high and results in complete destruction of patterns and permanent cessation of processes;
- The **probability** of occurrence, which describes the likelihood of the impact actually occurring and is estimated on a scale where:
 - 1 - very improbable (probably will not happen);
 - 2 - improbable (some possibility, but low likelihood);
 - 3 - probable (distinct possibility);
 - 4 - highly probable (most likely); or
 - 5 - definite (impact will occur regardless of any prevention measures);
- The **significance**, which is determined through a synthesis of the characteristics described above (refer formula below) and can be assessed as low, medium or high;
- The **status**, which is described as either positive, negative or neutral;
- The degree to which the impact can be reversed;
- The degree to which the impact may cause irreplaceable loss of resources; and
- The degree to which the impact can be mitigated.

The **significance** is determined by combining the criteria in the following formula:

$S = (E+D+M) \times P$; where
 S = Significance weighting
 E = Extent
 D = Duration
 M = Magnitude
 P = Probability

The **significance weightings** for each potential impact are calculated as follows:

Table 3: Significance Ranking

Significance of impact					
Extent	Duration	Magnitude	Probability	Significance	Weight
Points	Significant Weighting		Discussion		
< 30 points	Low		Where this impact would not have a direct influence on the decision to develop in the area.		
31-60 points	Medium		Where the impact could influence the decision to develop in the area unless it is effectively mitigated.		
> 60 points	High		Where the impact must have an influence on the decision process to develop in the area.		

7. PROJECT DESCRIPTION

7.1 Site location

The study area is located south of the N4 and north of M10 (Solomon Mahlangu Drive) on the eastern outskirts of Pretoria (Fig. 1). For more information, see the Technical Summary on p. iv above.

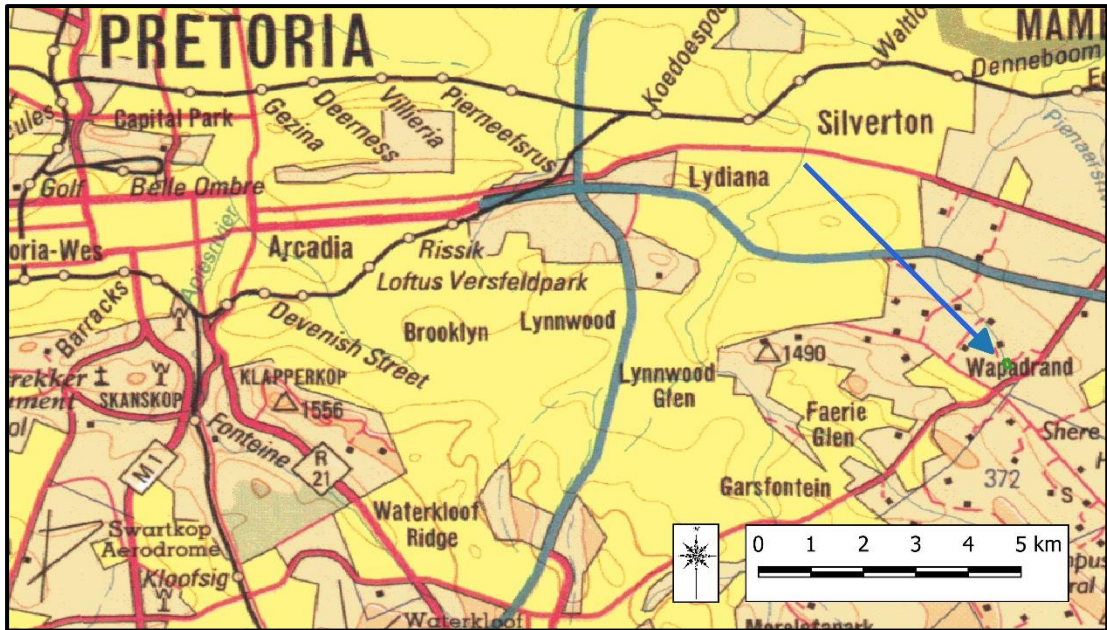


Fig. 1. Location of the study area in regional context (blue arrowed).
(Map 2528: Chief Surveyor-General)

7.2 Development proposal

It is proposed to develop a mixed used township, consisting of a number of dwelling units as well as office block, with open spaces for roads and parking (Fig. 2).

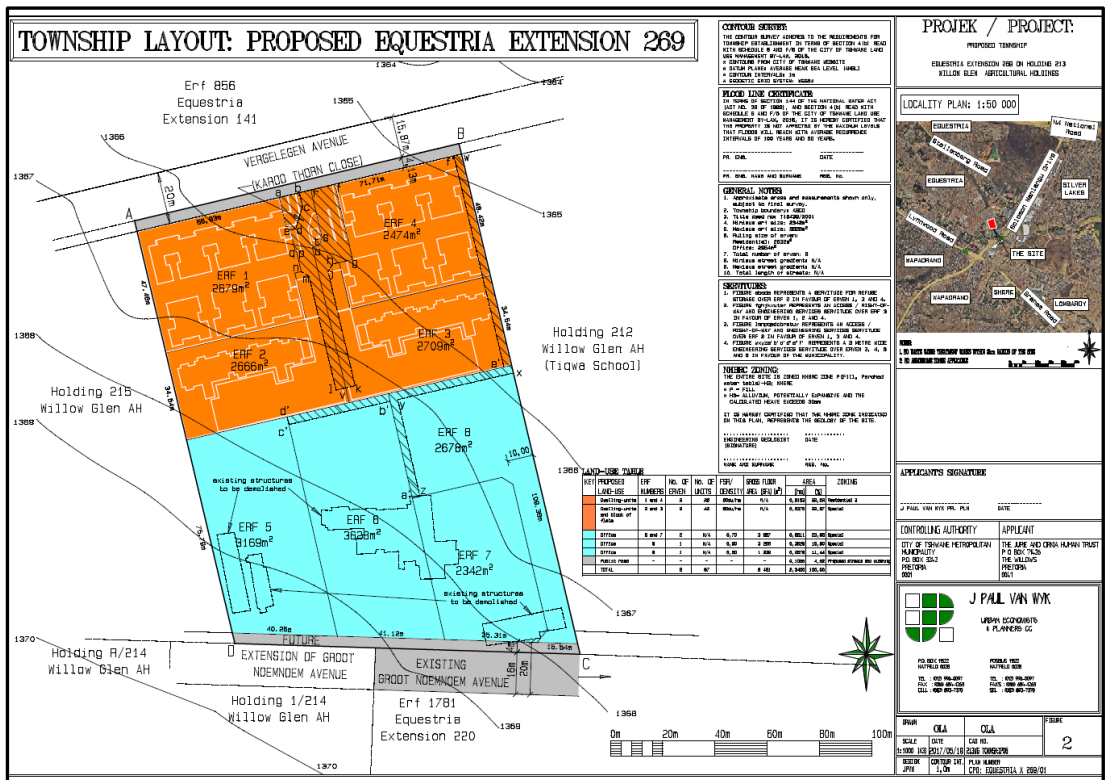


Fig. 2. Layout of the proposed development.
(Plan supplied by J Paul van Wyk)

8. DESCRIPTION OF THE AFFECTED ENVIRONMENT

8.1 Site description

The geology in the study area is made up of quartzite. The original vegetation is classified as Mixed Bushveld. However, all of this has changed due to previous agricultural activities and current urban development in the region. The topography is described as slightly undulating plains.

8.2 Overview of the region

The aim of this section is to present an overview of the history of the larger region in order to eventually determine the significance of heritage sites identified in the study area, within the context of their historic, aesthetic, scientific and social value, rarity and representivity – see Section 3.2 and Appendix 3 for more information.

Stone Age

Stone Age people occupied the larger area since earliest times. This, for example, is evidenced by the site they used to occupy in the Wonderboom neck (Mason 1969), probably dating back as much as 200 000 years ago. Tools derived from these people's habitation of the area are found in a number of areas close to the Apies River to the west and the Hartebeestspuit to the east.

Middle and Late Stone Age people also roamed over the area, sheltering close to the river banks, with the latter group usually settling in caves and rock shelters.

Iron Age

Iron Age people started to settle in southern Africa c. AD 300, with one of the oldest known sites at Broederstroom south of Hartebeespoort Dam dating to AD 470. Having only had cereals (sorghum, millet) that need summer rainfall, Early Iron Age (EIA) people did not move outside this rainfall zone, and neither did they occupy the central interior highveld area. Because of their specific technology and economy, Iron Age people preferred to settle on the alluvial soils near rivers for agricultural purposes, but also for firewood and water.

The occupation of the larger geographical area (including the study area) did not start much before the 1500s. By the 16th century things changed, with the climate becoming warmer and wetter, creating condition that allowed Late Iron Age (LIA) farmers to occupy areas previously unsuitable, for example the Witwatersrand, the Mpumalanga highveld and the treeless plains of the Free State.

Sites dating to the Late Iron Age are found all over. Some of them can be related to the Tswana-speakers, whereas others to the Ndebele-speakers and possibly a few also to the Ndebele of Mzilikazi.

The Iron Age sites tend to cluster in the Bronberg as well as on the more open flatlands, especially in areas where outcrops (dolorite, etc.) occur. It is possible, although not yet proven, that this distinction can be linked to the difference between the Sotho and Ndebele referred to above.

During the early decades of the 19th century, the Tswana- and Ndebele-speakers were dislodged by the Matabele of Mzilikazi. Internal strife caused Mzilikazi, a general of King

Shaka, and his followers to move away from the area between the Thukela and Mfolozi River (KwaZulu-Natal). Eventually, after a sojourn in the Sekhukhuneland area, followed by a short stay in the middle reaches of the Vaal River, they settled north of the Magaliesberg. One of three main settlements established by them, eKungwini, was on the banks of the Apies River, just north of Wonderboompoort (Carruthers 1990). However, no remains of this settlement have ever been identified.

It was during the Matabele's stay along the Apies River that the first white people entered the area: travelers and hunters such as Cornwallis Harris and Andrew Smith, traders Robert Schoon and Andrew McLuckie, and missionaries James Archbell and Robert Moffat. It is known from oral history the Robert Schoon sent Mzilikazi huge quantities of glass trade beads, rather than the guns that the latter coveted so much (Becker 1972).

Many sites relating to this period are located to the north of the study area. They consist of low stone-walled settlements and can be equated with the Ndebele-speakers that inhabited the region since the early 1600s (Van Schalkwyk, Pelsler & Van Vuuren 1996).

Historical period

This period started in the 1840s with Lucas Bronkhorst that settled to the east of the proposed bridge area. With the establishment of Pretoria and an increased demand for water, the farm was bought from him and a system of canals was built to take the water to town. Later a pump station was built to extract the water. This feature is located some distance south of the study area.

Early white farmers selected farms (such as Groenkloof, Rietfontein, Zwavelpoort and Doornpoort) and then provided a description of the farm to the local landdrost, who noted the detail in a registration book and gave the claimant a copy. Claimed land was then inspected before a title and deed were issued. Since the registration of land entailed registration costs and annual land taxes, it was often delayed as long as possible. As a result, the registration of land claimed on the basis of burgher rights continued well into the 1890s.

With the establishment of Pretoria (1850) services such as roads, started to develop. An increase in population also demanded more food, which stimulated development of farming on the alluvial soils on the banks of the Apies River, close to the water.

As the city grew, new suburbs were laid out, e.g. Lynnwood late 1950s, Willow Glen 1964, etc. From the 1943 version of the topocadastral map (Fig. 3) it can be seen that little development existed in the larger region of the study area and that land-use was largely farming based. Therefore, the opportunity of finding structures older than 60 years in this region is very small.

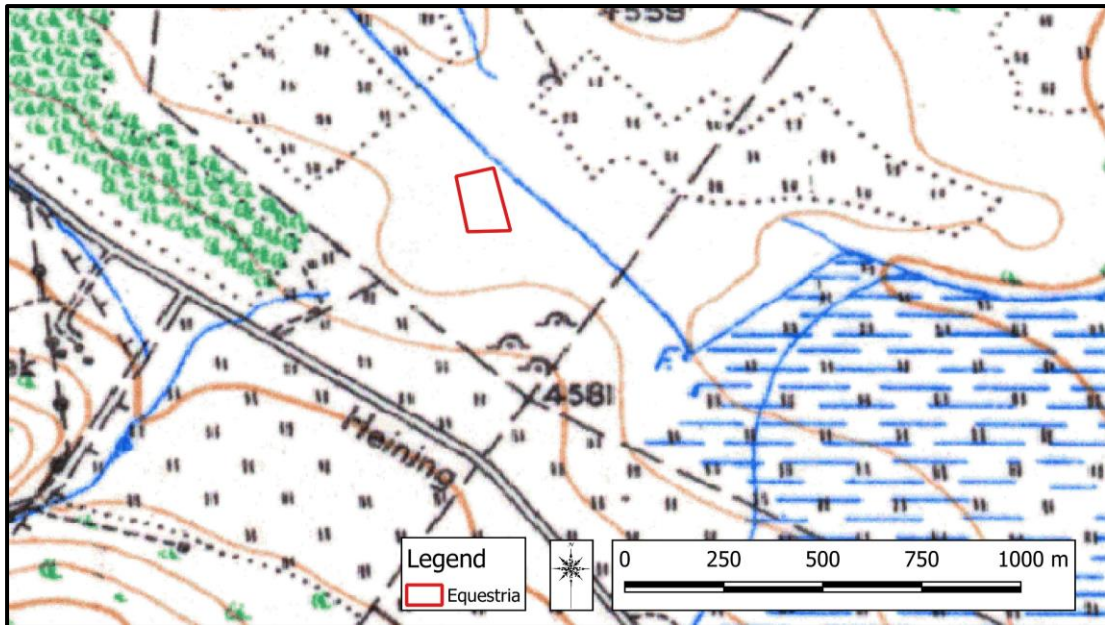


Fig. 3. The study area on the 1943 version of the topo-cadastral map.
(Map 2528CD: Chief Surveyor-General)

8.3 Identified sites

The following sites, features and objects of cultural significance were identified in the study area – see Appendix 6 for a discussion of each individual site.

In terms of Section 7 of the NHRA, all the sites currently known or which are expected to occur in the study area are evaluated to have a grading as identified in the table below.

8.3.1 Stone Age

- No sites, features or objects dating to the Stone Age were identified in the study area.

8.3.2 Iron Age

- No sites, features or objects dating to the Iron Age were identified in the study area.

8.3.3 Historic period

- No sites, features or objects dating to the historic period were identified in the study area.

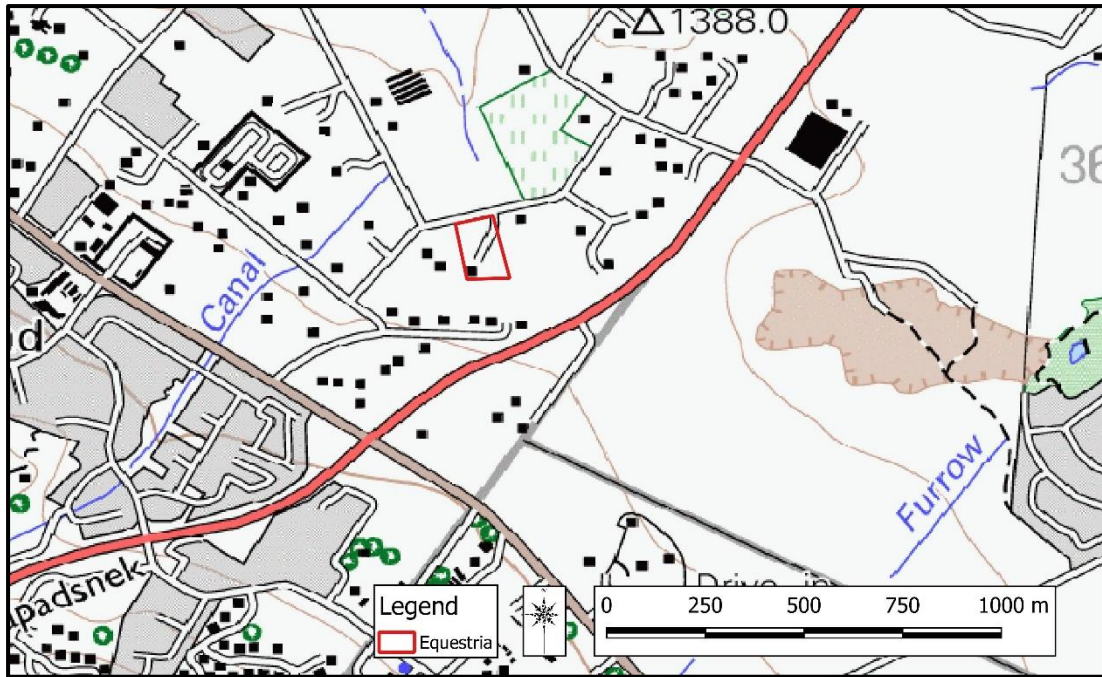


Fig. 4. Location of the identified sites.
(Map 2528CD: Chief Surveyor-General)¹

Table 4. Summary of Identified Heritage Resources in the Study Area.

IDENTIFIED HERITAGE RESOURCES			
NHRA category	Number	Coordinates	Impact rating
<i>Formal protections (NHRA)</i>			
National heritage site (Section 27)	None	-	-
Provincial heritage site (Section 27)	None	-	-
Provisional protection (Section 29)	None	-	-
Listed in heritage register (Section 30)	None	-	-
<i>General protections (NHRA)</i>			
Structures older than 60 years (Section 34)	None	-	-
Archaeological site or material (Section 35)	None	-	-
Palaeontological site or material (Section 35)	None	-	-
Graves or burial grounds (Section 36)	None	-	-
Public monuments or memorials (Section 37)	None	-	-
<i>Other</i>			
Any other heritage resources (describe)	None	-	-

8.4 Impact assessment

Heritage impacts are categorised as:

- Direct or physical impacts, implying alteration or destruction of heritage features within the project boundaries;
- Indirect impacts, e.g. restriction of access or visual intrusion concerning the broader environment;
- Cumulative impacts that are combinations of the above.

Impacts can be managed through one or a combination of the following measures:

¹ Please note that the latest available 1:50 000 topocadastral map (1984) does not reflect newest developments in the region.

- Mitigation
- Avoidance
- Compensation
- Enhancement (positive impacts)
- Rehabilitation
- Interpretation
- Memorialisation

Sources of risk were considered with regards to development activities defined in Section 2(viii) of the NHRA that may be triggered and are summarised in Table 5 below. These issues formed the basis of the impact assessment described. The potential risks are discussed according to the various phases of the project below.

Table 5. Potential Risk Sources.

	Activity	Description	Risk
Issue 1	Removal of Vegetation	Vegetation removal for site preparation and the installation of required infrastructure, e.g. access roads and water pipelines.	The identified risk is damage or changes to resources that are generally protected in terms of Sections 27, 28, 31, 32, 34, 35, 36 and 37 of the NHRA that may occur in the proposed project area.
Issue 2	Construction of required infrastructure, e.g. access roads, water pipelines	Construction machinery and vehicles will be utilised to construct the required infrastructure, e.g. access roads and water pipelines.	The identified risk is damage or changes to resources that are generally protected in terms of Sections 27, 28, 31, 32, 34, 35, 36 and 37 of the NHRA that may occur in the proposed project area.

Impact analysis of cultural heritage resources under threat of the proposed development, is based on the present understanding of the development and is presented in Appendix 7 and summarised in Table 6 below:

- As no sites, features or objects of cultural heritage significance were identified in the study area, there would be no impact.

9. MANAGEMENT MEASURES

Heritage sites are fixed features in the environment, occurring within specific spatial confines. Any impact upon them is permanent and non-reversible. Those resources that cannot be avoided and that are directly impacted by the proposed development can be excavated/recorded and a management plan can be developed for future action. Those sites that are not impacted on can be written into the management plan, whence they can be avoided or cared for in the future.

9.1 Objectives

- Protection of archaeological, historical and any other site or land considered being of cultural value within the project boundary against vandalism, destruction and theft.
- The preservation and appropriate management of new discoveries in accordance with the NHRA, should these be discovered during construction activities.

The following shall apply:

- Known sites should be clearly marked in order that they can be avoided during construction activities.
- The contractors and workers should be notified that archaeological sites might be exposed during the construction activities.
- Should any heritage artefacts be exposed during excavation, work on the area where the artefacts were discovered, shall cease immediately and the Environmental Control Officer shall be notified as soon as possible;
- All discoveries shall be reported immediately to a heritage practitioner so that an investigation and evaluation of the finds can be made. Acting upon advice from these specialists, the Environmental Control Officer will advise the necessary actions to be taken;
- Under no circumstances shall any artefacts be removed, destroyed or interfered with by anyone on the site; and
- Contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or palaeontological artefacts, as set out in the National Heritage Resources Act (Act No. 25 of 1999), Section 51. (1).

9.2 Control

In order to achieve this, the following should be in place:

- A person or entity, e.g. the Environmental Control Officer, should be tasked to take responsibility for the heritage sites and should be held accountable for any damage.
- Known sites should be located and isolated, e.g. by fencing them off. All construction workers should be informed that these are no-go areas, unless accompanied by the individual or persons representing the Environmental Control Officer as identified above.
- In areas where the vegetation is threatening the heritage sites, e.g. growing trees pushing walls over, it should be removed, but only after permission for the methods proposed has been granted by SAHRA. A heritage official should be part of the team executing these measures.

10. RECOMMENDATIONS

The cultural landscape qualities of the region is made up of a pre-colonial element consisting of very limited Stone Age and Iron Age occupation, as well as a much later colonial (farmer) component, which eventually gave rise to an urban component.

After reviewing the region and the site specifically, the following conclusions can be made:

- Based on available published and unpublished resources, it can be stated with a high degree of certainty that very few sites, features or objects of cultural significance are known to occur in the larger region surrounding the study area. This has always been an area of low human occupation prior to the intensive urbanisation that took place during the past 40 years.
- No known sites, features or objects of cultural significance are known to exist in the study area.
- The fact that the area has been used for farming and currently as small holding, would have had a negative impact on heritage features.

Reasoned opinion as to whether the proposed activity should be authorised:

- From a heritage point of view it is concluded that a full heritage impact assessment of the site is not required and it is recommended that a Letter of Recommendation for Exemption is issued by SAHRA for the proposed development be allowed to continue.

Conditions for inclusion in the environmental authorisation:

- Should archaeological sites or graves be exposed during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.

11. REFERENCES

11.1 Data bases

Chief Surveyor General
Environmental Potential Atlas, Department of Environmental Affairs and Tourism.
Heritage Atlas Database, Pretoria
National Archives of South Africa
SAHRA Archaeology and Palaeontology Report Mapping Project (2009)
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11.2 Literature

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Van Vuuren, C.J. 2006, Ndebele place names and settlement in Pretoria. *South African Journal of Cultural History* 20(1):78-124.

11.3 Maps and aerial photographs

1: 50 000 Topocadastral maps
Google Earth

APPENDIX 1. INDEMNITY AND TERMS OF USE OF THIS REPORT

The findings, results, conclusions and recommendations given in this report are based on the author's best scientific and professional knowledge as well as available information. The report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken and the author reserve the right to modify aspects of the report including the recommendations if and when new information may become available from ongoing research or further work in this field, or pertaining to this investigation.

Although all possible care is taken to identify all sites of cultural importance during the investigation of study areas, it is always possible that hidden or sub-surface sites could be overlooked during the study. The author of this report will not be held liable for such oversights or for costs incurred as a result of such oversights.

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APPENDIX 2. SPECIALIST COMPETENCYJohan (Johnny) van Schalkwyk

J A van Schalkwyk, D Litt et Phil, heritage consultant, has been working in the field of heritage management for more than 40 years. Originally based at the National Museum of Cultural History, Pretoria, he has actively done research in the fields of anthropology, archaeology, museology, tourism and impact assessment. This work was done in Limpopo Province, Gauteng, Mpumalanga, North West Province, Eastern Cape, Northern Cape, Botswana, Zimbabwe, Malawi, Lesotho and Swaziland. Based on this work, he has curated various exhibitions at different museums and has published more than 70 papers, most in scientifically accredited journals. During this period he has done more than 2000 impact assessments (archaeological, anthropological, historical and social) for various government departments and developers. Projects include environmental management frameworks, roads, pipeline-, and power line developments, dams, mining, water purification works, historical landscapes, refuse dumps and urban developments.

A complete *curriculum vitae* can be supplied on request.

APPENDIX 3. CONVENTIONS USED TO ASSESS THE SIGNIFICANCE OF HERITAGE RESOURCES

A system for site grading was established by the NHRA and further developed by the South African Heritage Resources Agency (SAHRA 2007) and has been approved by ASAPA for use in southern Africa and was utilised during this assessment.

Significance

According to the NHRA, Section 2(vi) the **significance** of a heritage sites and artefacts is determined by it aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technical value in relation to the uniqueness, condition of preservation and research potential. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these.

Matrix used for assessing the significance of each identified site/feature

1. SITE EVALUATION				
1.1 Historic value				
Is it important in the community, or pattern of history				
Does it have strong or special association with the life or work of a person, group or organisation of importance in history				
Does it have significance relating to the history of slavery				
1.2 Aesthetic value				
It is important in exhibiting particular aesthetic characteristics valued by a community or cultural group				
1.3 Scientific value				
Does it have potential to yield information that will contribute to an understanding of natural or cultural heritage				
Is it important in demonstrating a high degree of creative or technical achievement at a particular period				
1.4 Social value				
Does it have strong or special association with a particular community or cultural group for social, cultural or spiritual reasons				
1.5 Rarity				
Does it possess uncommon, rare or endangered aspects of natural or cultural heritage				
1.6 Representivity				
Is it important in demonstrating the principal characteristics of a particular class of natural or cultural places or objects				
Importance in demonstrating the principal characteristics of a range of landscapes or environments, the attributes of which identify it as being characteristic of its class				
Importance in demonstrating the principal characteristics of human activities (including way of life, philosophy, custom, process, land-use, function, design or technique) in the environment of the nation, province, region or locality.				
2. Sphere of Significance		High	Medium	Low
International				
National				
Provincial				
Regional				
Local				
Specific community				
3. Field Register Rating				
1.	National/Grade 1: High significance - No alteration whatsoever without permit from SAHRA			
2.	Provincial/Grade 2: High significance - No alteration whatsoever without			

	permit from provincial heritage authority.	
3.	Local/Grade 3A: High significance - Mitigation as part of development process not advised.	
4.	Local/Grade 3B: High significance - Could be mitigated and (part) retained as heritage register site	
5.	Generally protected A: High/medium significance - Should be mitigated before destruction	
6.	Generally protected B: Medium significance - Should be recorded before destruction	
7.	Generally protected C: Low significance - Requires no further recording before destruction	

APPENDIX 4. RELEVANT LEGISLATION

All archaeological and palaeontological sites, and meteorites are protected by the National Heritage Resources Act (Act no 25 of 1999) as stated in Section 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: Provided that the protection of any wreck in the territorial waters and the maritime cultural zone shall be the responsibility of SAHRA.

(2) Subject to the provisions of subsection (8)(a), all archaeological objects, palaeontological material and meteorites are the property of the State. The responsible heritage authority must, on behalf of the State, at its discretion ensure that such objects are lodged with a museum or other public institution that has a collection policy acceptable to the heritage resources authority and may in so doing establish such terms and conditions as it sees fit for the conservation of such objects.

(3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.

(4) No person may, without a permit issued by the responsible heritage resources authority-

- (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- (c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.

In terms of cemeteries and graves the following (Section 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 such arrangements for their conservation as it sees fit.

(2) SAHRA must identify and record the graves of victims of conflict and any other graves which it deems to be of cultural significance and may erect memorials associated with the grave referred to in subsection (1), and must maintain such memorials.

(3) No person may, without a permit issued by SAHRA or a provincial heritage resources authority-

- (a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
- (b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
- (c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.

(4) SAHRA or a provincial heritage resources authority may not issue a permit for the destruction or damage of any burial ground or grave referred to in subsection (3)(a) unless it is satisfied that the applicant has made satisfactory arrangements for the exhumation and re-interment of the contents of such graves, at the cost of the applicant and in accordance with any regulations made by the responsible heritage resources authority.

The National Heritage Resources Act (Act no 25 of 1999) stipulates the assessment criteria and grading of archaeological sites. The following categories are distinguished in Section 7 of the Act:

- **Grade I:** Heritage resources with qualities so exceptional that they are of special national significance;
- **Grade II:** Heritage resources which, although forming part of the national estate, can be considered to have special qualities which make them significant within the context of a province or a region; and
- **Grade III:** Other heritage resources worthy of conservation, and which prescribes heritage resources assessment criteria, consistent with the criteria set out in section 3(3), which must be used by a heritage resources authority or a local authority to assess the intrinsic, comparative and contextual significance of a heritage resource and the relative benefits and costs of its protection, so that the appropriate level of grading of the resource and the consequent responsibility for its management may be allocated in terms of section 8.

Presenting archaeological sites as part of tourism attraction requires, in terms 44 of the Act, a Conservation Management Plan as well as a permit from SAHRA.

(1) Heritage resources authorities and local authorities must, wherever appropriate, co-ordinate and promote the presentation and use of places of cultural significance and heritage resources which form part of the national estate and for which they are responsible in terms of section 5 for public enjoyment, education, research and tourism, including-

- (a) the erection of explanatory plaques and interpretive facilities, including interpretive centres and visitor facilities;
- (b) the training and provision of guides;
- (c) the mounting of exhibitions;
- (d) the erection of memorials; and
- (e) any other means necessary for the effective presentation of the national estate.

(2) Where a heritage resource which is formally protected in terms of Part I of this Chapter is to be presented, the person wishing to undertake such presentation must, at least 60 days prior to the institution of interpretive measures or manufacture of associated material, consult with the heritage resources authority which is responsible for the protection of such heritage resource regarding the contents of interpretive material or programmes.

(3) A person may only erect a plaque or other permanent display or structure associated with such presentation in the vicinity of a place protected in terms of this Act in consultation with the heritage resources authority responsible for the protection of the place.