

HERITAGE IMPACT ASSESSMENT

FOR THE PROPOSED NKOMO FILLING STATION DEVELOPMENT, GAUTENG PROVINCE

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LEAP

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General

The possibility of unmarked or informal graves and subsurface finds cannot be excluded. If any possible finds are made during construction, the operations must be stopped and a qualified archaeologist contacted for an assessment of the find/s.

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SIGNATURE:

 _____

EXECUTIVE SUMMARY

Site name and location: The proposed Nkomo Filling Station is located on 49 Tlou Street, Atteridgeville Extension 5, City of Tshwane Metropolitan Municipality, Gauteng Province.

1: 50 000 Topographic Map: 2528 CC.

EIA Consultant: Leap

Developer: Safari Retail Investments RSA Ltd

Heritage Consultant: Heritage Contracts and Archaeological Consulting CC (HCAC).

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Date of Report: 27 March 2017

Findings of the Assessment:

HCAC was appointed to assess the study area in terms of Section 38 (8) of the NHRA as part of the Basic Assessment (BA) for the project. Historically the site has been undeveloped until 2015. The site has since been entirely transformed and disturbed and cleared of vegetation and this nullified the value of a field based assessment. During the site visit no surface indicators of heritage sites noted. Surveys close to the study area (Van der Walt 2017, Kruger 2016 and Pelsers 2003) also recorded no heritage features. Due to the lack of surface evidence of heritage resources no further mitigation prior to construction is recommended in terms of the archaeological component of Section 35 for the proposed development to proceed.

In terms of the built environment of the area (Section 34), no standing structures older than 60 years occur within the study area and similarly no burial sites (Section 36) were recorded. However, if any graves are located in future they should ideally be preserved *in-situ* or alternatively relocated according to existing legislation. No public monuments are located within or close to the study area.

The study area is surrounded by commercial and infrastructure developments and no significant cultural landscapes or views were noted during the fieldwork. HCAC is of the opinion that from a heritage point of view there is no reason why the development should not proceed if the following recommendations as made in the report area adhered to and based on approval from SAHRA.

- Due to the subsurface nature of archaeological remains and the fact that site has entirely been transformed, it is recommended that a chance find procedure as outlined in Section 7 of this report is implemented for the project as part of the EMP.

CONTENTS

ABBREVIATIONS	8
GLOSSARY	8
1 BACKGROUND INFORMATION	9
1.1. Terms of Reference	10
1.2. Archaeological Legislation and Best Practice	10
1.3. Description of Study Area	12
1.3.1 Location Data	12
1.3.2. Location Map	13
2. APPROACH AND METHODOLOGY.....	15
2.1 Phase 1 - Desktop Study	15
2.1.1 Literature Search	15
2.1.2 Information Collection	15
2.1.3 Consultation	15
2.1.4 Google Earth and Mapping Survey.....	15
2.1.5 Genealogical Society of South Africa	16
2.2 Phase 2 - Physical Surveying	16
2.3. Restrictions	17
3. NATURE OF THE DEVELOPMENT	17
4.1 Databases Consulted.....	18
4.2. Brief background to the study area	18
5. HERITAGE SITE SIGNIFICANCE AND MITIGATION MEASURES	23
5.1. Field Rating of Sites	24
6. BASELINE STUDY-DESCRIPTION OF SITES	25
7. CONCLUSIONS AND RECOMMENDATIONS.....	28
7.1 Reasoned Opinion	30
8. PROJECT TEAM	30
9. STATEMENT OF COMPETENCY	30
10. REFERENCES.....	31

FIGURES

Figure 1. 1: 250 000 Location map indicating the study area in blue. 13

Figure 2. 1:50 000 Topographic map indicating the study area in blue. 14

Figure 3. 1943 Archival Map indicating the study area in blue. 22

Figure 4. 2016 Google Earth image of the study area. 25

Figure 5. From Google Imagery dating to August 2015 it is clear that the entire property was extensively disturbed at this time. 26

Figure 6: General site conditions 27

Figure 7. General site conditions 27

Figure 8: Disturbed nature of study area. 27

Figure 9. General site conditions. 27

ABBREVIATIONS

AIA: Archaeological Impact Assessment
ASAPA: Association of South African Professional Archaeologists
BIA: Basic Impact Assessment
CRM: Cultural Resource Management
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMP: Environmental Management Plan
ESA: Early Stone Age
GPS: Global Positioning System
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act
MSA: Middle Stone Age
NEMA: National Environmental Management Act
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to recently, 100 years ago)

The Iron Age (~ AD 400 to 1840)

Historic (~ AD 1840 to 1950)

Historic building (over 60 years old)

1 BACKGROUND INFORMATION

Heritage Contracts and Archaeological Consulting CC (**HCAC**) was appointed to conduct a Heritage Impact Assessment for the proposed Nkomo Filling station development as part of the Basic Assessment process.

The aim of the study is to identify cultural heritage sites, document, and assess their importance within local, provincial and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

The report outlines the approach and methodology utilized before and during the survey, which includes: Phase 1, a desktop study that includes collection from various sources and consultations; Phase 2, the physical surveying of the study area on foot and by vehicle; Phase 3, reporting the outcome of the study.

General site conditions were recorded by means of photographs, GPS locations, and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report.

This report must also be submitted to the SAHRA for review.

1.1. Terms of Reference

Desktop study

Conduct a brief desktop study where information on the area is collected to provide a background setting of the archaeology that can be expected in the area.

Field study

Conduct a field study to: a) systematically survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points identified as significant areas; c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with Heritage legislation and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

1.2. Archaeological Legislation and Best Practice

Phase 1, an AIA or a HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of a heritage specialist input is to:

- » Identify any heritage resources, which may be affected;
- » Assess the nature and degree of significance of such resources;
- » Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- » Assess the negative and positive impact of the development on these resources;
- » Make recommendations for the appropriate heritage management of these impacts.

The AIA or HIA, as a specialist sub-section of the EIA, is required under the National Heritage Resources Act NHRA of 1999 (Act 25 of 1999), Section 23(2) (b) of the NEMA and section S. 39 (3) (b) (iii) of the MPRDA.

The AIA should be submitted, as part of the EIA, BIA or EMP, to the PHRA if established in the province or to SAHRA. SAHRA will be ultimately responsible for the professional evaluation of Phase 1 AIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 AIA reports and additional development information, as per the EIA, BIA/EMP, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 AIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level).

Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 AIA's are primarily concerned with the location and identification of sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for from SAHRA by the client before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance no. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

1.3. Description of Study Area

1.3.1 Location Data

The Applicant intends the development of a filling Station to be known as Nkomo Filling Station at 49 Tlou Street, Atteridgeville Extension 5, City of Tshwane Metropolitan Municipality, Gauteng Province (Figure 1 & 2). The study area consists of an extensively disturbed open area.

1.3.2. Location Map

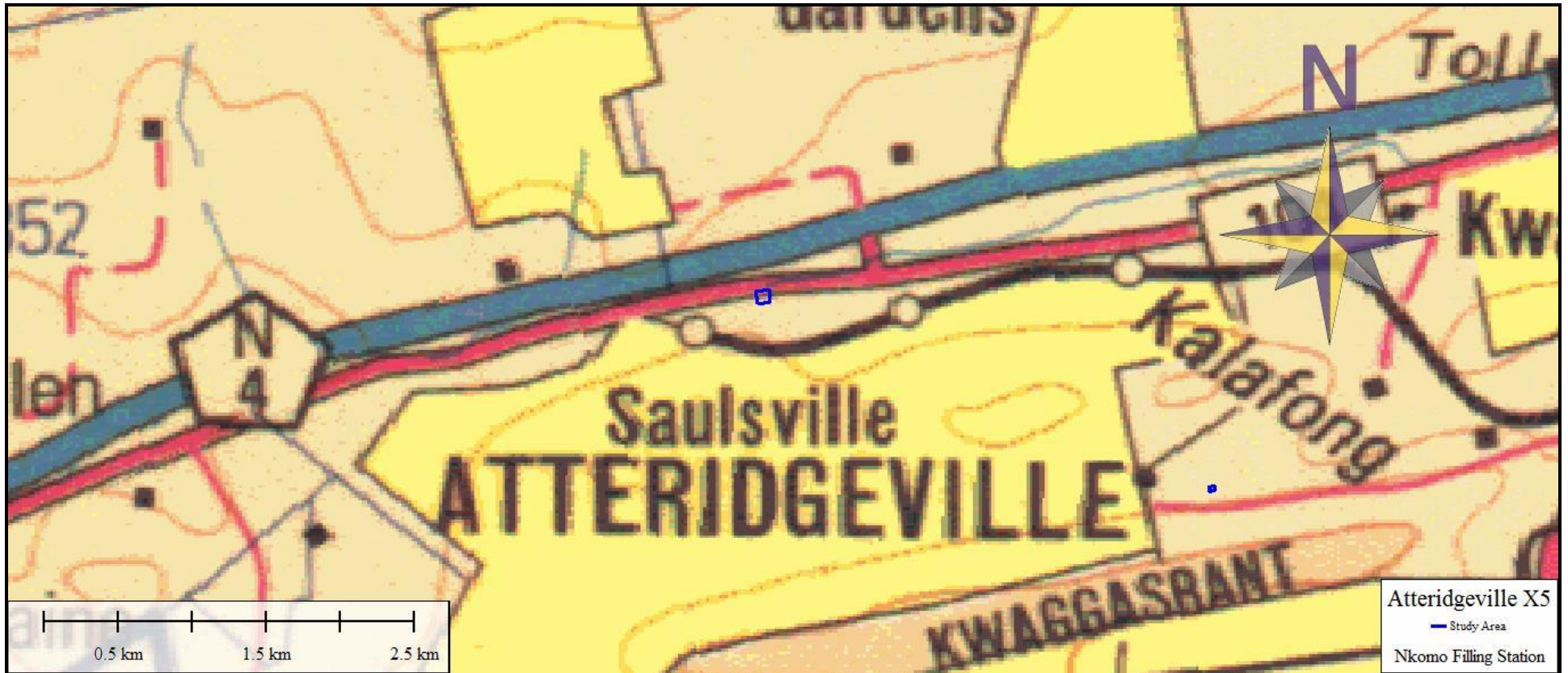


Figure 1. 1: 250 000 Location map indicating the study area in blue.

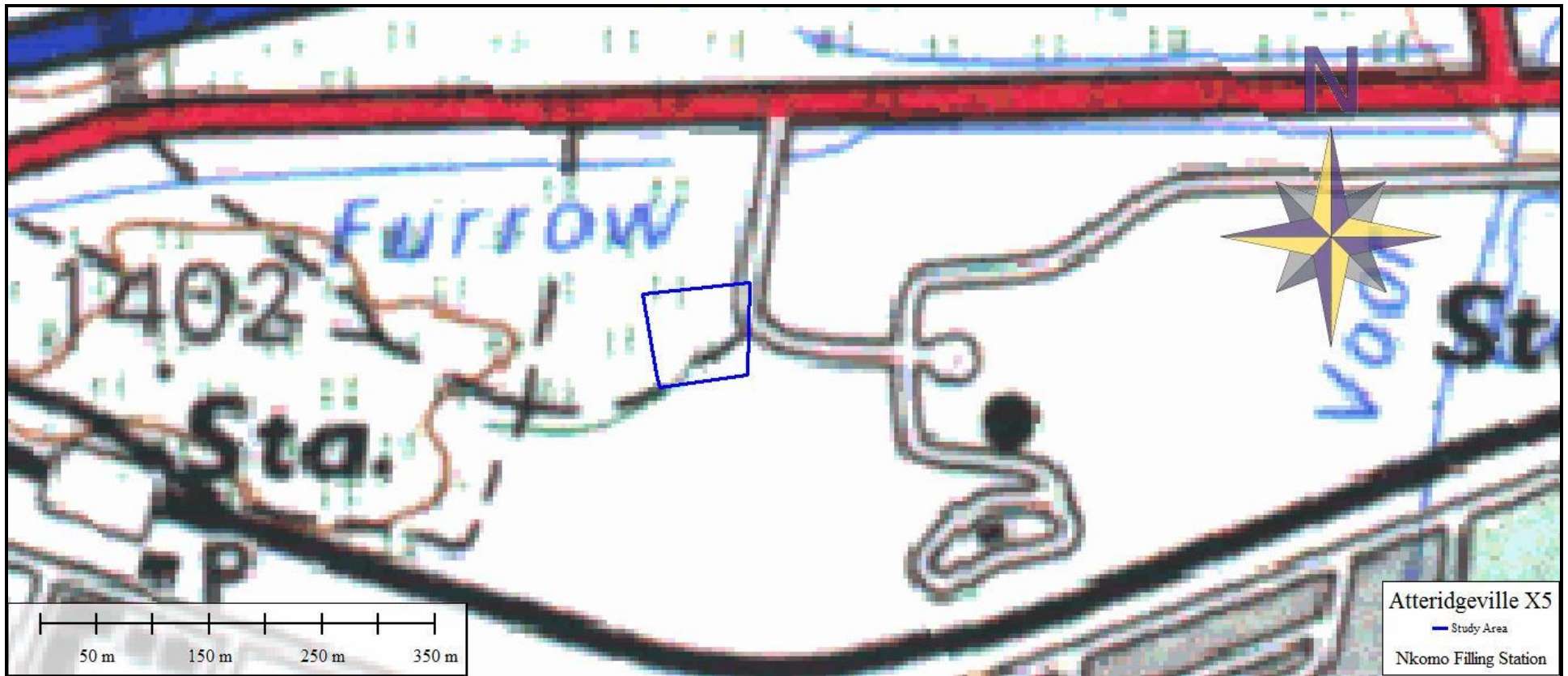


Figure 2. 1:50 000 Topographic map indicating the study area in blue.

2. APPROACH AND METHODOLOGY

The aim of the study is to cover archaeological databases to compile a background of the archaeology that can be expected in the study area followed by field verification; this was accomplished by means of the following phases.

2.1 Phase 1 - Desktop Study

The first phase comprised desktop, scanning existing records for archaeological sites, historical sites, graves, architecture (structures older than 60 years) of the area. The following approach was followed:

2.1.1 Literature Search

This was conducted by utilising data stored in the national archives and published reports relevant to the area. The aim of this is to extract data and information on the area in question.

2.1.2 Information Collection

SAHRIS was consulted to collect data from previously conducted CRM projects in the region to provide a comprehensive account of the history of the study area.

2.1.3 Consultation

Stakeholder engagement is a key component of any BAR process. It involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern and assist the developers to take account of locally relevant conditions. Public consultation is a legislative requirement of the NHRA. The stakeholder engagement provides a platform for issues and comments to be raised that will add value to the BAR process, thereby influencing the decision-making process. The following tasks were undertaken:

- Stakeholder identification and analysis;
- Compilation of information sharing documentation;
- Stakeholder notification;
- Stakeholder meetings undertaken with I&APs;
- The compilation of a Draft Basic Assessment Report (DBAR) and a Comments and Response Report (CRR).

No heritage concerns were raised.

2.1.4 Google Earth and Mapping Survey

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located.

2.1.5 Genealogical Society of South Africa

The database of the Genealogical Society was consulted to collect data on any known graves in the area.

2.2 Phase 2 - Physical Surveying

Due to the nature of cultural remains, the majority of which occurs below surface, a field survey of the proposed development was conducted. The study area was surveyed on the 24th of March 2017. The study area has been disturbed by ground clearing activities and this would have obliterated surface indicators of heritage resources. No heritage features were noted. The study area could be visually inspected, but access to the site was restricted by a fence and locked gates.

2.3. Restrictions

Due to the subsurface nature of archaeological artefacts, the possibility exists that some features or artefacts may not have been discovered/ recorded during the survey and the possible occurrence of unmarked graves and other cultural material cannot be excluded. This report only deals with the footprint area of the proposed development as indicated in the location map. It should be noted that access in the study area was restricted. It is possible that new information, which could change the recommendations, could come to light through the following:

- Exposure of archaeological and historical sites and objects that are hidden or are buried during site clearance activities;
- Exposure of hidden archaeological and historical sites and objects (obscured by the tarmac etc.).

Although HCAC surveyed the area as thoroughly as possible, it is incumbent upon the developer to stop operations and inform the relevant heritage agency should further cultural remains, such as graves, stone tool scatters, artefacts, bones or fossils, be exposed during the process of development. It should be noted that this study did not include palaeontology for the proposed impact area.

3. NATURE OF THE DEVELOPMENT

The Applicant intends to develop a Filling Station on part of Erf: 9045 in the Township of Atteridgeville Extension 5, within the City of Tshwane Metropolitan Municipality. The development would include the filling station and associated infrastructure as well as access roads and parking areas. The site comprises approximately 0.3472 hectares.

4. HISTORICAL AND ARCHAEOLOGICAL BACKGROUND OF THE STUDY AREA

4.1 Databases Consulted

The following CRM reports was conducted close to this study and was consulted for this report:

Author	Year	Project name	Findings
Pelser,A	2003	Phase 1 Hia Report for The Proposed Upgrade of The Kwaggasrand Waste Recycling Facility Located on Pretoria Town & Townlands 351JR, City of Tshwane Municipality, Gauteng	No Sites were recorded.
Roodt, F.	2002	Phase 1 AIA Proposed Township Development Lotus Gardens, Pretoria, Gauteng Province	Stone Age sites, Stone walled features
Van Schalkwyk, J.	2012	Heritage Impact Assessment for The Proposed Fort West Phase 1 Development, Pretoria Magisterial District, Gauteng Province	Stone Walled settlements
Kruger, N	2016	Archaeological Impact Assessment (AIA) On A Portion 539 Of the Farm Pretoria Town and Townlands 351 JR, Gauteng Province for The Proposed Lotus Gardens X17 Retail Centre Development, City Of Tshwane, Gauteng Province	No sites were recorded
Van der Walt, J.	2017	Heritage Impact Assessment for The Proposed Maunde Street Filling Station Development, Gauteng Province	No sites were recorded.

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located.

Genealogical Society and Google Earth Monuments

Neither the Genealogical Society nor the monuments database at Google Earth (Google Earth also include some archaeological sites and historical battlefields) have any recorded sites in the study area.

4.2. Brief background to the study area

J. S. Bergh's historical atlas of the four northern provinces of South Africa is a very useful source for the writing of local and regional histories. Interestingly, the study area is located in the vicinity of an Early Stone Age Terrain, known as Wonderboompoort. This mountainous area at Wonderboompoort was also important to Iron Age communities, as it was located within an area where many Late Iron Age terrains were found. (Bergh 1999: 4, 7)

The Difaqane (Sotho), or Mfekane ("the crushing" in Nguni) was a time of bloody upheavals in Natal and on the Highveld, which occurred around the early 1820's until the late 1830's. It came about in response to heightened competition for land and trade, and caused population groups like gun-carrying Griquas and Shaka's Zulus to attack other tribes. At the beginning of the nineteenth century, the predominant black tribe in the area north of Pretoria was the Manala-Ndebele. The Kgatla were also present to the north of where Pretoria is located today.

It seems that, in 1832, Shaka's Zulu tribe passed by the south of Pretoria from the southeast in a westerly direction. This was in order to attack Mzilikazi's Ndebele. This group also went on raids in various other areas in order to expand their area of influence. (Bergh 1999: 11, 14, 109-119).

Pyramid Koppies to the north and the mountain range on the farm Onderstepoort to the north east is renowned for the LIA stone walled sites. To the north east of the study area is the well-known stone walled complex of KwaMnyamana.

During the time of the Difaqane, a northwards migration of white settlers from the Cape was also taking place. Some travellers, missionaries and adventurers had gone on expeditions to the northern areas in South Africa, some as early as the 1720's.

The Scottish travellers Robert Scoon and William McLuckie passed through, or close by the area where the study area was located in 1829. In the same year, Robert Moffat and James Archbell also travelled through this area. In the mid 1830's, several travellers made their way from the Pretoria area inland. These included the travellers Robert Scoon, Dr. Andrew Smith and Captain William Cornwallis Harris. (Bergh 1999: 12-13)

It was however only by the late 1820's that a mass-movement of Dutch speaking people in the Cape Colony started advancing into the northern areas. This was due to feelings of mounting dissatisfaction caused by economical and other circumstances in the Cape. This movement later became known as the Great Trek. This migration resulted in a massive increase in the extent of that proportion of modern South Africa dominated by people of European descent. (Ross 2002: 39)

Pretoria was founded in 1855 and became the capital of South Africa, then known as the Zuid-Afrikaanse Republiek (ZAR), in 1860. By 1900, Pretoria was a thriving Transvaal town, with shaded streets, well-kept gardens and a lively economy. In mid-1899, the Pretoria district had a white population of 21 000 men and 19 000 women, while the black, coloured and Indian population totalled 38 618. (Theron 1984: 1-3)

The Anglo-Boer War was the greatest conflict that had taken place in South Africa up to date, and also affected the Pretoria district. The white concentration camp closest to the study area was situated a small distance to the northeast of Pretoria. A white and a black concentration camp are located to the southwest of Pretoria, in the Irene area. One battle took place at Silkaatsnek, to the northwest of Pretoria, some distance from the project area. Here, General De la Rey's Boer troops defeated the British army on 11 July 1900. The Boer side however generally lost ground against the British as the war continued, and in June 1900 the Boer military leaders decided that Pretoria would have to be surrendered to the British forces. This decision was inevitable if the war was to be continued. The town was very susceptible to a siege, and its defence would have gravely endangered the lives of its inhabitants. More importantly, the defence of the town would involve such a great number of Boers that the capture of these men would have surely meant the end of the war. Pretoria was therefore occupied by British forces on Tuesday 5 June 1900. (Bergh 1999: 54, 250; Theron 1984: 273-279). Between 1939 and 1940, farm boundaries were drawn up in an area that includes the present-day Pretoria. (Bergh 1999: 15).

The following Atteridgeville timeline that shows the historical development of the area was digitised by the Open Scholarship & Digitisation Programme, University of Pretoria, 2016 and can be found in the Van der Waal Collection at the Repository of the University of Pretoria.

- 1929 Establishment of Saulsville as a white residential area.
- 1936 First plans in the City Council of Pretoria to establish a black 'location' west of the city.
- 1939 Establishment of Atteridgeville, then called 'MotseMogolo' (Large Town). However, blacks nicknamed it 'Phelindaba', meaning 'all arguments are over'.
- 18 March 1940 MotseMogolo renamed 'Atteridgeville' after Mrs MP (Patricia) Atteridge at a mass meeting. The name was put forward in a stirring speech by Mr Keble 'Mote'.
- 5 August 1940 Opening of Atteridgeville by Mr HG Lawrence, Minister of the Interior and Public Health, and Paramount Chief Seeiso Griffiths Moshoeshoe from Lesotho. First 720 houses completed. 'The WNLA Band under Capt V Earwood played at the opening ceremony. The Manager of Native and Asiatic Administration Department of the City Council of Pretoria was Mr JR Brent. Residents are coming from Marabastad, Bantule and Hove's Ground.
- 1940-1945 Mrs Atteridge opens the first soup kitchen in South Africa for black people in Atteridgeville, serving some 2 500 small children during the winter months.
- 1941 First two schools in Atteridgeville completed: Walter Jameson and WH Hofmeyr. Jameson and Hofmeyr were members of the Committee for Non-white and Asiatic Affairs of the Pretoria City Council. First church in Atteridgeville built: the Swiss Mission Church. Corner stone laid by Calvin Maphope on 16 March.
- 1942 JJ de Jong Primary School established. DeJong was a member of the Pretoria City Council and responsible for the design of the houses in Atteridgeville.
- 3 Nov 1944 Saulsville becomes part of Atteridgeville (Government Gazette 3410.)
- 1946 Soup Kitchen Building completed at Ramohoebo Square. Corner stones laid of the Methodist Church by Rev Weavind, Rev JS Molohe and Rev HW Rist on 30 June. Corner stone laid of the African Catholic Church by Chief ST Lefifi on behalf of Bishop JK Sesoko, on 23 September.
- 9 March 1947 Opening of the Methodist Church
- 1949 Total of 1 533 houses built to date.
- 1950s First hostels built.
- 1950 Corner stone laid of the AME Church ('Ebenezer Temple') by Bishop IH Bouner on 24 September.
- 1951 Polyclinic completed at Ramohoebo Square. Atteridgeville has 10 100 residents living in 1 532 houses.
- 1952 Post Office completed at Ramohoebo Square.

1958	Atteridgeville Railway Station opened.
1962	Total of 9 830 houses built to date.
Nov 1966	Mr LL French dies and leaves R385 930 to be used for purposes of building a modern sport complex for Atteridgeville.
Jan. 1968	Influx control measures freeze all residential development.
June 1973	The Administration Board of Central Transvaal takes over the management of Atteridgeville.
1976	Buildings burnt down during school riots: Old Post Office, Old Beer Hall, Madiba Kwena Bottle Store and Okl Municipal Offices.
Nov. 1978	Establishment of the Atteridgeville Community Council.
1979	99-year leasehold system made available to residents.
1982	Atteridgeville Town Council established.
1983	Town council members elected in 14% poll.
24 Jan 1984	Town Council of Atteridgeville inaugurated.
1984	School boycotts and urban unrest organised by the Saulsville/ Atteridgeville Youth Organisation (SA YO) and the Atteridgeville/Saulsville Residents' Organisation (ASRO), both affiliated to the United Democratic Front.
1984	The Black Communities Development Act, No 4 of 1984, passed, enhancing the status of black city councils. Atteridgeville gains municipal status.
1987	Expansion plans for the western areas approved.
1988	Estimated population 90 000, of which 11 511 were hostel dwellers ..
1989	Atteridgeville College established, situated between the residential area and Kalofong Hospital. Buildings completed 1991. Funded by the Anglo-American Corporation's Chairman's Fund.
1997	Atteridgeville defined within the Mabopane-Centurion Development Corridor.
1999	Population estimated at 110 000 people.
2000	New clinic at Gazankulu approved by City Council of Pretoria.



Figure 3. 1943 Archival Map indicating the study area in blue.

5. HERITAGE SITE SIGNIFICANCE AND MITIGATION MEASURES

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface.

This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance:

- » The unique nature of a site;
- » The integrity of the archaeological/cultural heritage deposits;
- » The wider historic, archaeological and geographic context of the site;
- » The location of the site in relation to other similar sites or features;
- » The depth of the archaeological deposit (when it can be determined/is known);
- » The preservation condition of the sites;
- » Potential to answer present research questions.

Furthermore, The National Heritage Resources Act (Act No 25 of 1999, Sec 3) distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- » Its importance in/to 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;
- » Sites of significance relating to the history of slavery in South Africa.

5.1. Field Rating of Sites

Site significance classification standards prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 7 of this report.

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP.A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP.B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

6. BASELINE STUDY-DESCRIPTION OF SITES

It is important to note that only the development footprint was surveyed. The study area comprises an open area that has been disturbed by ground clearing and earth works (Figure 6 – 9). The area is fenced with a security gate. Through Google Earth Imagery it can be deduced that the development and clearing of this area commenced in 2015 (Figure 4 and 5). The clearing of the site from 2015 (as per Google Imagery) would have obliterated and or covered any indicators of heritage resources in the study area and no sites of significance were noted during field work.



Figure 4. 2016 Google Earth image of the study area.



Figure 5. From Google Imagery dating to August 2015 it is clear that the entire property was extensively disturbed at this time.



Figure 6: General site conditions



Figure 7. General site conditions



Figure 8: Disturbed nature of study area.



Figure 9. General site conditions.

7. CONCLUSIONS AND RECOMMENDATIONS

HCAC was appointed to assess the study area in terms of Section 38 (3) of the NHRA as part of the Basic Assessment (BA) for the project. The study area has been entirely transformed after 2015 (Figure 4 and 5) by earthworks and this nullified the value of the field based assessment. Due to the lack of surface evidence of heritage resources and the disturbed nature of the site no further mitigation prior to construction is recommended from an archaeological point of view for the proposed development to proceed.

The study area is surrounded by commercial and infrastructure developments and no significant cultural landscapes or views were noted during the fieldwork. HCAC is of the opinion that from a heritage point of view there is no reason why the development should not proceed if the following recommendations are adhered to and based on approval from SAHRA.

- Due to the subsurface nature of archaeological remains and the fact that site has entirely been transformed, it is recommended that a chance find procedure is implemented for the project as part of the EMPr.

Chance find procedure

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

In Line with the NHRA Act 25 of 1999 Section 38.3 this report provided the heritage authority with the following:

NHRA Section 38.3 Requirement	Application to this study
Identification and Mapping of heritage resources	No heritage resources occur in the study area
Assessment of significance of identified heritage resources	No heritage resources occur in the study area
Assessment of the impact of the development on heritage resources	The proposed development of the Nkomo Filling Station will not have a significant impact on heritage resources.
Evaluation of the impact of the development on heritage resources relative to social and economic benefits of the development	Due to the lack of heritage resources in the development footprint the social and economic benefits of the project outweigh the impact of the project on the heritage resources of the larger area.
Results of consultation with interested and affected parties regarding the impact of the development on heritage resources	No heritage concerns were raised
If heritage resources will be adversely affected by the proposed development, the consideration of alternatives	No heritage resources will be affected and no alternatives were considered.
Plans for mitigation of any adverse effects during and after the completion of the proposed development	Implementation of a chance find procedure.

7.1 Reasoned Opinion

From a heritage perspective, the proposed project is acceptable. If the above recommendations are adhered to and based on approval from SAHRA, HCAC is of the opinion that the development can continue as the development will not impact negatively on the heritage record of the area. If during the pre-construction phase or during construction, any archaeological finds are made (e.g. graves, stone tools, and skeletal material), the operations must be stopped, and the archaeologist must be contacted for an assessment of the finds. Due to the subsurface nature of archaeological material and graves the possibility of the occurrence of unmarked or informal graves and subsurface finds cannot be excluded.

8. PROJECT TEAM

Jaco van der Walt, Project Manager and archaeologist

Marko Hutten, Archaeologist

9. STATEMENT OF COMPETENCY

I (Jaco van der Walt) am a member of ASAPA (no 159), and accredited in the following fields of the CRM Section of the association: Iron Age Archaeology, Colonial Period Archaeology, Stone Age Archaeology and Grave Relocation. This accreditation is also acknowledged by SAHRA and AMAFA.

I have been involved in research and contract work in South Africa, Botswana, Zimbabwe, Mozambique, Tanzania and the DRC; having conducted more than 300 AIA's since 2000.

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