



Archaetnos Culture & Cultural
Resource Consultants
BK 98 09854/23

**A REPORT ON A BASIC ASSESSMENT
FOR PROPOSED RESIDENTIAL DEVELOPMENT
ON ERF1483, ERF1299 AND THE REMAINING EXTENT OF ERF 453 IN
ARCADIA, PRETORIA, GAUTENG**

For:

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REPORT: AE01232P

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SUMMARY

Archaetnos cc was appointed by Urban Nest to conduct a Basic Assessment (including a desktop study) on Erven 1483, 1299 and the Remaining Extent of Erf 453 in Arcadia, Pretoria. The American School is currently located on these properties that are for sale and Urban Nest is planning to obtain these for the development of student accommodation and related infrastructure here. They appointed Archaetnos cc to conduct this study in an early stage of their development plans in order for them to make informed decisions on the way forward, including recommendations regarding possible mitigation measures should the planned development go ahead.

Based on this basic assessment, which included a superficial assessment of the structures located here, it is clear that some of the buildings here are older than 60 years of age and has some degree of heritage significance. Recent changes to the structures have however diminished their significance. Therefore although there will be a direct impact on the heritage resources by the future development, the impacts will be minimal and would be possible to mitigate. It is our opinion therefore that the development can continue and that the mitigation measures that are recommended at the end of this report will actually add value to the development.

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1. INTRODUCTION

Archaetnos cc was appointed by Urban Nest to conduct a Basic Assessment (including a desktop study) on Erven 1483, 1299 and the Remaining Extent of Erf 453 in Arcadia, Pretoria. The American School is currently located on these properties that are for sale and Urban Nest is planning to obtain these for the development of student accommodation and related infrastructure here. They appointed Archaetnos cc to conduct this study in an early stage of their development plans in order for them to make informed decisions on the way forward, including recommendations regarding possible mitigation measures should the planned development go ahead.

Based on the basic assessment it is clear that some of the structures located here are older than 60 years of age and has some heritage significance. Recent changes to the structures have however diminished their significance. Although there will be a direct impact on the heritage resources by the future development, the impact will be minimal and would be possible to mitigate.

The client indicated the area where the proposed development is to take place, and the assessment was confined to the relevant properties. A site visit was conducted in the presence of the client on the 15th of May 2012.

2. TERMS OF REFERENCE

The Terms of Reference for the assessment were to:

1. Identify all objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) that could possibly be located on the property and the larger geographical area
2. Assess the significance of these cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value.
3. Describe the possible impact of the proposed development on these remains, according to a standard set of conventions.
4. Recommend suitable mitigation measures should there be any sites of significance that might be impacted upon negatively by the proposed development.
5. Review applicable legislative requirements.

3. CONDITIONS & ASSUMPTIONS

The following conditions and assumptions have a direct bearing on the survey and the resulting report:

1. Cultural Resources are all non-physical and physical man-made occurrences, as well as natural occurrences associated with human activity. These include all sites, structure and artifacts of importance, either individually or in groups, in the history,

architecture and archaeology of human (cultural) development. Graves and cemeteries are included in this.

2. The significance of the sites, structures and artifacts is determined by means of their historical, social, aesthetic, technological and scientific value in relation to their uniqueness, condition of preservation and research potential. The various aspects are not mutually exclusive, and the evaluation of any site is done with reference to any number of these aspects.
3. Cultural significance is site-specific and relates to the content and context of the site. Sites regarded as having low cultural significance have already been recorded in full and require no further mitigation. Sites with medium cultural significance may or may not require mitigation depending on other factors such as the significance of impact on the site. Sites with a high cultural significance require further mitigation.
4. The latitude and longitude of any archaeological or historical site or feature, is to be treated as sensitive information by the developer and should not be disclosed to members of the public.
5. All recommendations are made with full cognizance of the relevant legislation.
6. It has to be mentioned that it is almost impossible to locate all the cultural resources in a given area due to factors such as the subterranean nature of cultural remains. Developers should however note that the report must make it clear how to handle any other finds that might occur or be located during development actions.

4. LEGISLATIVE REQUIREMENTS

Aspects concerning the conservation of cultural resources are dealt with mainly in two acts. These are the National Heritage Resources Act (Act 25 of 1999) and the National Environmental Management Act (Act 107 of 1998).

4.1 The National Heritage Resources Act

According to the above-mentioned act the following is protected as cultural heritage resources:

- a. Archaeological artifacts, structures and sites older than 100 years
- b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography
- c. Objects of decorative and visual arts
- d. Military objects, structures and sites older than 75 years
- e. **Historical objects, structures and sites older than 60 years**
- f. Proclaimed heritage sites
- g. Grave yards and graves older than 60 years
- h. Meteorites and fossils
- i. Objects, structures and sites or scientific or technological value.

The National Estate includes the following:

- a. Places, buildings, structures and equipment of cultural significance
- b. Places to which oral traditions are attached or which are associated with living heritage
- c. **Historical settlements and townscapes**
- d. Landscapes and features of cultural significance
- e. Geological sites of scientific or cultural importance
- f. Archaeological and palaeontological importance
- g. Graves and burial grounds
- h. Sites of significance relating to the history of slavery
- i. Movable objects (e.g. archaeological, palaeontological, meteorites, geological specimens, military, ethnographic, books etc.)

A Heritage Impact Assessment (HIA) is the process to be followed in order to determine whether any heritage resources are located within the area to be developed as well as the possible impact of the proposed development thereon. An Archaeological Impact Assessment only looks at archaeological resources. The different phases during the HIA process are described in Appendix E. An HIA must be done under the following circumstances:

- a. The construction of a linear development (road, wall, power line canal etc.) exceeding 300m in length
- b. The construction of a bridge or similar structure exceeding 50m in length
- c. Any development or other activity that will change the character of a site and exceed 5 000m² or involve three or more existing erven or subdivisions thereof
- d. Re-zoning of a site exceeding 10 000 m²
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority

Structures

Section 34 (1) of the mentioned act states that no person may demolish any structure or part thereof which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

A structure means any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith.

Alter means any action affecting the structure, appearance or physical properties of a place or object, whether by way of structural or other works, by painting, plastering or the decoration or any other means.

Archaeology, palaeontology and meteorites

Section 35(4) of this act deals with archaeology, palaeontology and meteorites. The act states that no person may, without a permit issued by the responsible heritage resources authority (national or provincial):

- 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 that assists in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.
- e. alter or demolish any structure or part of a structure which is older than 60 years as protected.

The above mentioned may only be disturbed or moved by an archaeologist, after receiving a permit from the South African Heritage Resources Agency (SAHRA). In order to demolish such a site or structure, a destruction permit from SAHRA will also be needed.

4.2 The National Environmental Management Act

This act (Act 107 of 1998) states that a survey and evaluation of cultural resources must be done in areas where development projects, that will change the face of the environment, will be undertaken. The impact of the development on these resources should be determined and proposals for the mitigation thereof are made.

Environmental management should also take the cultural and social needs of people into account. Any disturbance of landscapes and sites that constitute the nation's cultural heritage should be avoided as far as possible and where this is not possible the disturbance should be minimized and remedied.

5. METHODOLOGY

5.1 Survey of literature

A survey of literature is normally undertaken in order to obtain background information regarding an area that are being assessed. Sources consulted in this regard are indicated in the bibliography. In this case we also made use of old maps obtained from the Chief Surveyor General website (csg.dla.gov.za) and information contained in the National Archives of South Africa's data base.

5.2 Field survey

Although a field assessment and a detailed investigation of the structures located on the properties were not required for this phase of the work a superficial assessment was undertaken during a site meeting with the client. When required, the location/position of any site is determined by means of a Global Positioning System (GPS), while photographs are also taken where needed.

5.3 Oral histories

People from local communities are sometimes interviewed in order to obtain information relating to a surveyed area. It needs to be stated that this is not applicable under all circumstances. When applicable, the information is included in the text and referred to in the bibliography. For this phase no oral histories were recorded although it is envisaged that social consultation (which will include a public participation process) will be conducted during future phases.

5.4 Documentation

All sites, objects features and structures identified were documented according to the general minimum standards accepted by the archaeological profession. Co-ordinates of individual localities are determined by means of the Global Positioning System (GPS). The information is added to the description in order to facilitate the identification of each locality on a map of the area.

5.5 Evaluation of Heritage sites

The evaluation of heritage sites is normally done by giving a field rating to each using the following criteria:

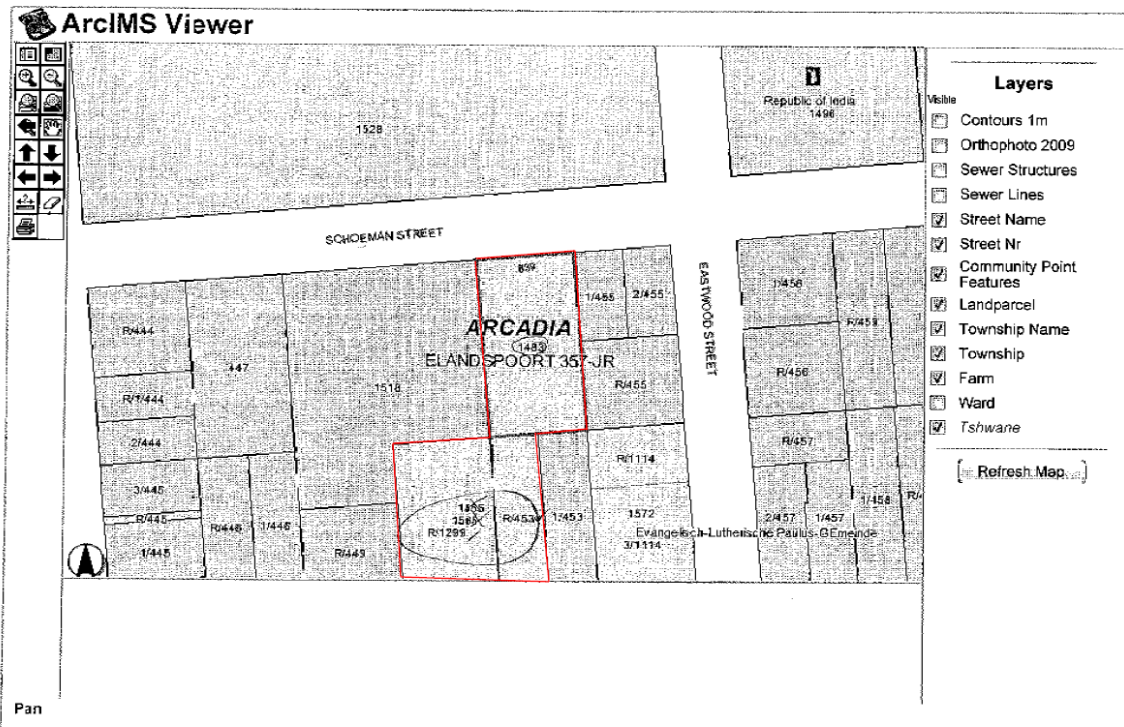
- The unique nature of a site
- The integrity of the archaeological deposit (if this exists)
- The wider historic, archaeological and geographic context of the site
- The location of the site in relation to other similar sites or features
- The depth of the archaeological deposit (when it can be determined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

6. DESCRIPTION OF THE AREA

The properties earmarked for the possible development of student accommodation and other related infrastructure are Erven 1483, 1299 and the Remaining Extent of Erf 453 in Arcadia. It is located between Schoeman, Eastwood and Arcadia streets. It is situated on the original farm Elandspoort 357 JR.

All three properties are dominated by structural (residential) developments – some recent and some older – while the properties were used up to recently by the American International School of Johannesburg at Pretoria. The properties are now being sold and the developer (Urban Nest) is considering acquiring said properties and undertaking the development of student accommodation. Some of the structures located could be utilized in the development.

As a result of past and more recent urban developments the area has been extensively disturbed from a cultural heritage (archaeological and historical) point of view. However, some of the structures on the properties (or parts of them) are older than 60 years of age and will form the focus of this report.



http://gis.tshwane.gov.za/website/Tshwane_Internet/viewer.htm?ACTIVE_LAYER=7&OUERY=LIS_KEY%20%3D%200020014831&O... 13/06/2011

Figure 1: Location of the development properties marked with red boundary lines.

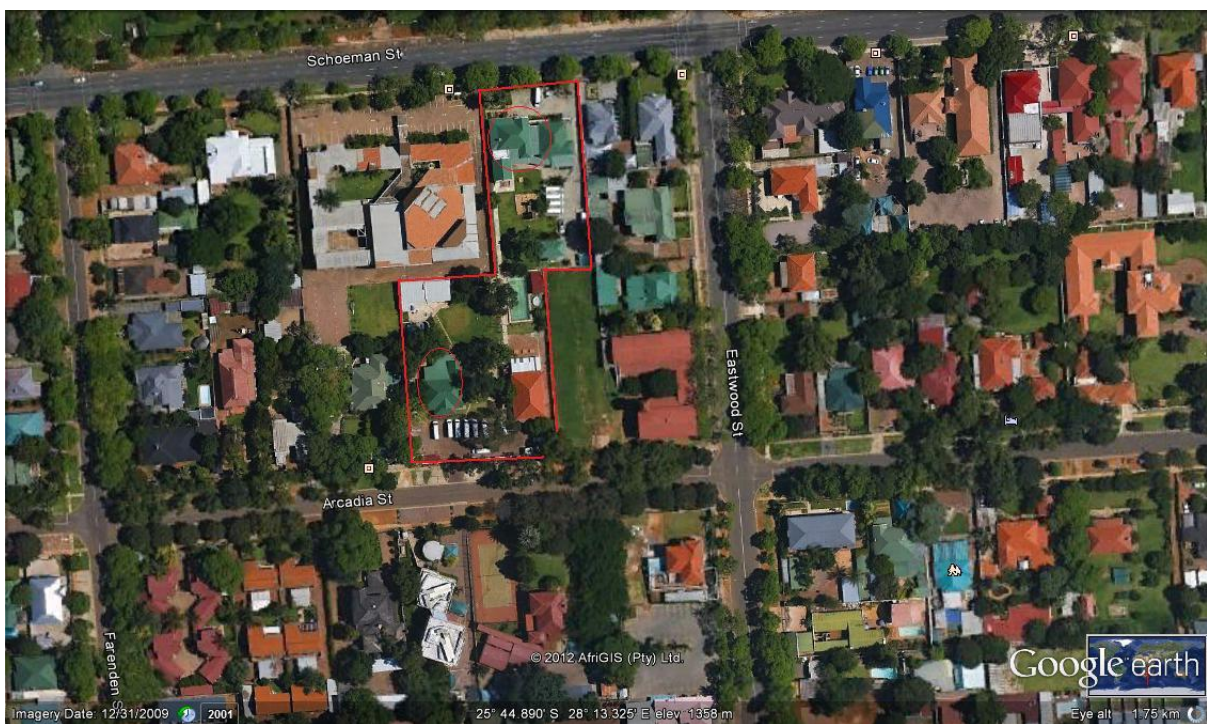


Figure 2: Aerial view of location of area indicated with red boundary lines. The old structures are indicated with red circles. Also note similar houses in the larger area (Google Earth Image 12/31/2009).



Figure 3: Front view of building on Erf 1483 (Schoeman street entrance).



Figure 4: Another view of the structure at the back (facing Arcadia street). Parts of this are possibly older than 60 years of age and still untouched but many changes has occurred over the recent time.



Figure 5: Swimming pool and modern structure on the property.

7. DISCUSSION

As the properties are located in a primarily urban setting, the chances of any prehistoric (Stone Age and Iron Age) sites, features or objects being present, is very slim. If any did exist here in the past it would have been destroyed or disturbed to a large degree.

Due to the nature of archaeological finds, that in many cases have a subterranean presence, there is always a possibility that such could be discovered accidentally during development work. In order to enable the reader to better understand possible archaeological and cultural features that may be unearthed during these activities, it is necessary to give a background regarding the different phases of human history. The assessment of the properties itself will be discussed after this section.

7.1 Stone Age

The Stone Age is the period in human history when lithic material was mainly used to produce tools (Coertze & Coertze 1996: 293). In South Africa the Stone Age can be divided in three periods. It is however important to note that dates are relative and only provide a broad framework for interpretation. The division for the Stone Age according to Korsman & Meyer (1999: 93-94) is as follows:

Early Stone Age (ESA) 2 million – 150 000 years ago

Middle Stone Age (MSA) 150 000 – 30 000 years ago

Late Stone Age (LSA) 40 000 years ago – 1850 - A.D

No known Stone Age sites or artifacts are present in the area. The closest known Stone Age sites are those of the well-known Early Stone Age site at Wonderboompoort and a number of sites in the Magaliesberg area (Bergh 1999: 4). If any Stone Age artifacts are to be found in the area then it would more than likely be single, out of context, stone tools. Urbanization over the last 150 years or so would have destroyed any evidence if indeed it did exist.

7.2 Iron Age

The Iron Age is the name given to the period of human history when metal was mainly used to produce metal artifacts (Coertze & Coertze 1996: 346). In South Africa it can be divided in two separate phases according to Van der Ryst & Meyer (1999: 96-98), namely:

Early Iron Age (EIA) 200 – 1000 A.D.

Late Iron Age (LIA) 1000 – 1850 A.D.

Huffman (2007: xiii) however indicates that a Middle Iron Age should be included. His dates, which now seem to be widely accepted in archaeological circles, are:

Early Iron Age (EIA) 250 – 900 A.D.

Middle Iron Age (MIA) 900 – 1300 A.D.

Late Iron Age (LIA) 1300 – 1840 A.D.

No Early Iron Age sites are known in the larger geographical area of Pretoria, while Later Iron Age sites do occur in the Pretoria area (Bergh 1999: 7). The closest known LIA sites are at Silver Lakes and near Mamelodi on the farm Hatherley (Van Schalkwyk et.al 1996). These sites are related to the Manala Ndebele (Bergh 1999: 10) who was present in the area at the time when the first Europeans arrived here during the mid 19th century.

7.3 Historical Age

The properties and some of the structures located on it clearly belongs to the last period. The historical age started with the first recorded oral histories in the area. It includes the moving into the area of people that were able to read and write.

The first Europeans to move through and into the area were the groups of Schoon and McLuckie and the missionaries Archbell and Moffat in 1829 (Bergh 1999: 12). They were followed by others such as Andrew Smith (1835), Cornwallis Harris (1836) and David Livingstone in 1847 (Bergh 1999: 13). These groups were closely followed by the Voortrekkers after 1844 and Pretoria was established in 1855 (Bergh 1999: 14-17).

The farm Koedoespoort on which the township of Hatfield was established was first granted to Lourens Cornelius Bronkhorst on the 6th of July 1859 and was surveyed by W.A.B. Anderson in 1879 (CSG document 10H7I001). Arcadia is shown on this map as well.

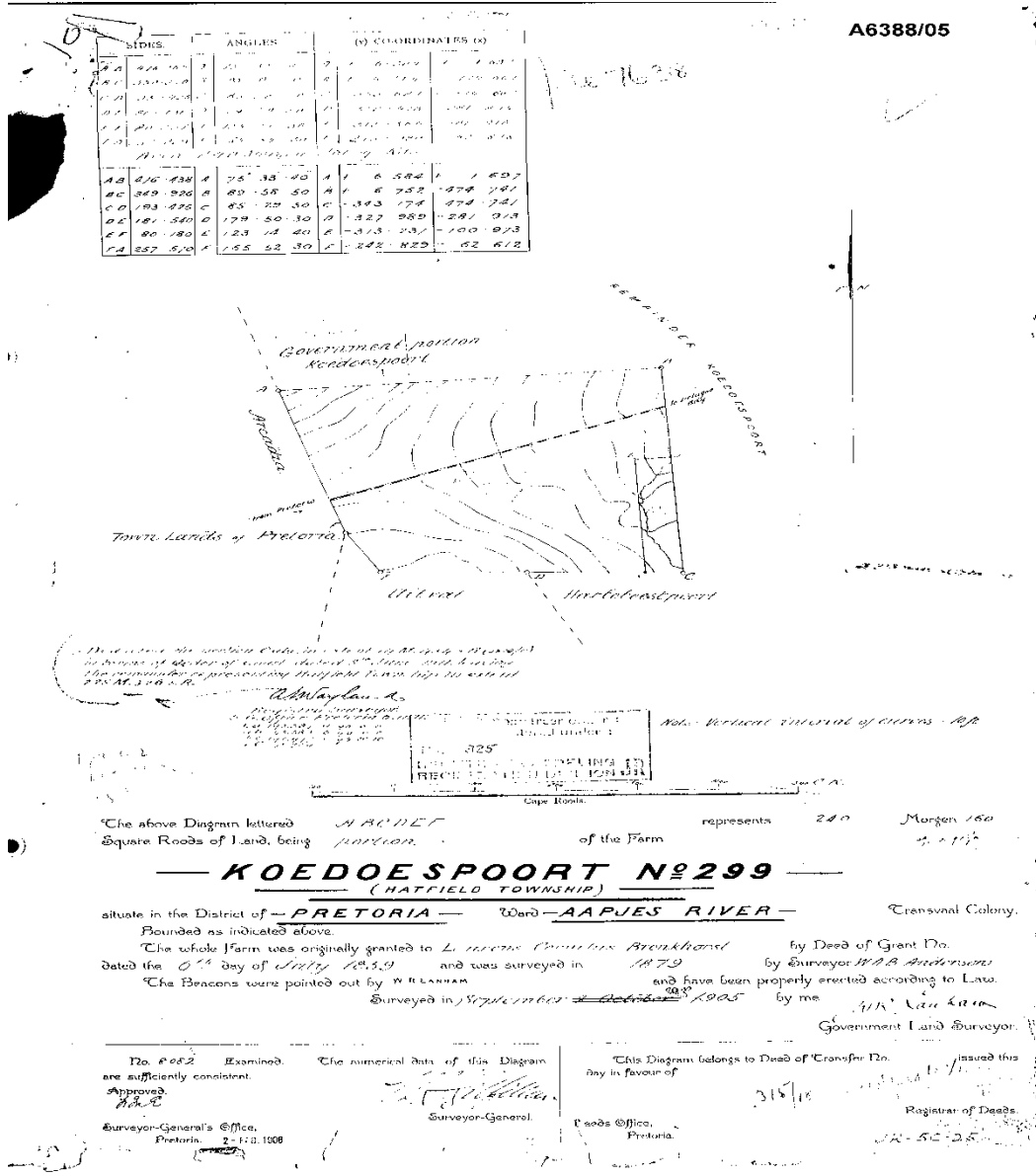


Figure 6: Map indicating the farm Koedoespoort 299 on which Hatfield was established dating to 1905. Note Arcadia being indicated here.

A map of the original Elandsport 193 (on which these properties are located and now 357JR) found in the Archives (Map 10HCLJ01), and dating to June 1929, shows that the farm (or a portion of it) was transferred to one W.J.Schutte on 17 March 1873. It is however possible that the farm existed before this date and possibly soon after the establishment of Pretoria in 1855.

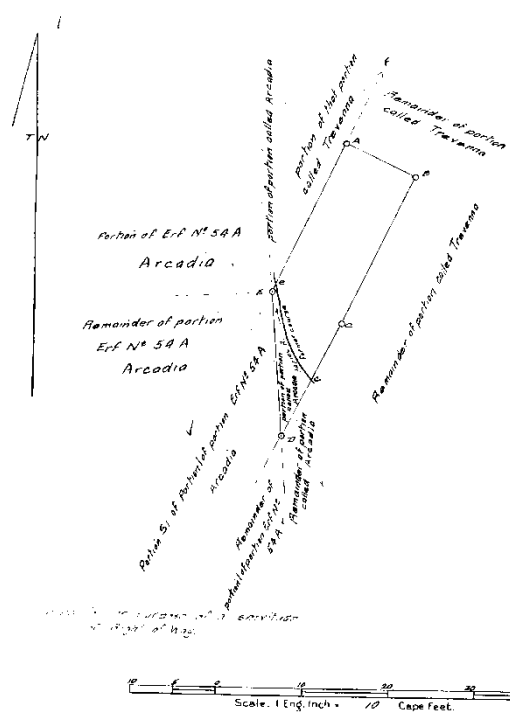
Approved

W. J. Schutte
for Surveyor General.

Description of Beacons
A, B, C, D are $\frac{1}{2}$ " high
E is $1\frac{1}{2}$ " high
Cm = 0.8
Cc = 7.7

SIDES.	Length.	ANGLES OF DIRECTION	COORDINATES.	
	Cape Feet.		y	x
A B	9.00	205 31 40	A - 1766.18	- 8314.13
B C	14.95	295 31 40	B - 1770.04	- 8322.25
C D	15.35	296 21 40	C - 1788.04	- 8313.65
D E	17.63	85 39 30	D - 1801.79	- 8304.83
E A	20.00	115 31 40	E - 1786.21	- 8305.51
			F - 1826.00	- 8344.74

Rect Area = 249 sq Feet.



The figure represents
— Morgan 221 Square feet of land called portion S1 of that portion called Trevenna of the farm
ELANDSPOORT NO 193
situate in the DISTRICT of Pretoria
Surveyed in June 1929 by me
PROVINCE OF TRANSVAAL
J. S. G. Schutte
Land Surveyor.

This diagram is annexed to Deed of No. 221 dated in favour of Registrar of Deeds	The original diagram is No. annexed to Deed of Transfer No. 470/1873 dated 17 9 1873 in favour of W. J. Schutte	S.G. File No. #18 Survey Records No. 42/1929 Compilation Trac. in file 418 Lat. South 25° 45' Long. East 28° 10'
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Figure 7: Map indicating portion of Elandsport 193 (now 357 JR), indicating that W.J.Schutte got a portion of the farm in 1873.

Information obtained from the National Archives Database indicates that one G.E.Fawcus gave notice on the 26th of January 1873 that he will survey the farm for its owner H.J.Schoeman (TAB, SS, Vol.153 Reference 68/73). In 1913 portions of the farm was transferred to the Council of the Municipality of Pretoria (SAB, URU, Vol.128 Reference

362), while certain portions of the portion known as Arcadia of the farm Elandspoort 193 was indicated as being reserved in 1914 (SAB, URU, Vol.179 Reference 410). It was not possible to obtain any specific information on the erven or structures located on them at this stage.

There are a number of structures located on the three properties. Some of these are recent developments, while there are two structures here that (the original sections of them) are most probably older than 60 years of age. This deduction is based on superficial observations of structural elements and style and not a detailed assessment of the buildings. Many additions and changes to the original structures are visible, diminishing their historical significance. A number of similarly styled and aged buildings are located in the larger area and erven bordering these properties.

The main structure in which the American International School (Erf 1483) was situated seems to have been less impacted on by modern additions and changes over time, with large sections still retaining its original structure and style. The second building (on Erf 1299) has been changed to a large degree, with less than half of the original still remaining. Structural and other elements found in the houses include the gabled facades, original wood flooring in some sections, pressed (decorated) metal ceilings (still present under modern ceilings), and other decorative elements such as the decorative air vents. These elements also give a relative date to the structures and indicate it as being older than 60 years of age at least.

The fact that the neighborhood in which the buildings is located has also nearly completely changed its nature to one with many modern structures and businesses affects the significance of these structures. Recent additions and changes to the structures have also impacted on their significance and uniqueness. Although the historical context of the properties has also been changed, many similarly styled and dated structures are still however found in the neighbourhood, giving the structures more significance in terms of their historical sense of place. This does however diminish their uniqueness further, as there are other better preserved examples of the same type of historical structure in the neighbourhood. However, the negative impacts of the proposed development will still have to be mitigated.

The basic assessment of the properties and structures located on them is therefore the following (based on a superficial assessment):

Historic value:	Low - Medium
Aesthetic value:	Low - Medium
Scientific value:	Low
Social value:	Low - Medium
Rarity:	Although possibly unique has been changed significantly over time

Cultural significance:

- Low to Medium

Field ratings:

- General protection B (IV B) site should be recorded before destruction (medium significance)



Figure 8: One of the neighbouring properties to Erf 1483. Note the historical house similar to that of the one on Erf 1483.



Figure 9: Part of the old house on Erf 1483. This section was probably added at a later stage, but could also be older than 60 years of age.



Figure 10: Modern structure on the site.



**Figure 11: Entrance to structure on Erf 1299.
The original house is similar to the one on Erf 1483,
but has been changed to a larger degree.**



Figure 12: A view of the property adjacent to Erf 1299. The house here is similar to the one on 1299, but has not been changed so much.

8. CONCLUSIONS AND RECOMMENDATIONS

It can be concluded that the basic assessment (including a desktop study) for Erven 1483, 1299 and the remainder of Erf 453, located in Arcadia, Pretoria, was completed successfully. The client, Urban Nest, is contemplating the development of student accommodation with related infrastructure on these properties and required the study in order to make an informed decision on the viability of the development. Two historic structures are located on these properties, but as a result of various additions and changes to these structures over time, their heritage significance is relatively low. The site on Erf 1483 is however of higher significance due to the fact that it is in a more pristine condition. The impact of the development on this structure should therefore be mitigated. This building can be incorporated into the development plans and need not be demolished. The structures (originally) are older than 60 years of age and as a result are protected by the National Heritage Act (Act 25 of 1999). As the assessment was only superficial and no detailed work was possible more work will have to be done should the proposed development continue.

Therefore the following is recommended:

1. that a detailed Heritage Impact Assessment of the properties and historical structures on them be undertaken in order to determine the exact age and significance of each structure. The resultant report will inform the public, SAHRA and the developer in terms of the way forward. However it is our belief that the structure on Erf 1299 can be demolished, although detailed documentation will have to be undertaken. The second structure (on Erf 1483) can be utilized and incorporated into the development plans. This will add value to the development and will ensure that the original structure be preserved for future generations.

2. that a Public Participation process, which would include advertisements and site notices indicating the intent of the client to undertake the planned development, must be undertaken prior to the development continuing.

3. Should the development continue it is recommended that parts of the original elements of the house on Erf 1299, including the pressed ceilings and moulded decorative air vents, be removed and preserved for posterity. An architectural historian should be involved in this process

3. that the history of the area and structures be recorded in more detail and that this information be incorporated into a display or information plaque at the site where the development will take place

Finally, the subterranean presence of archaeological and/or historical sites, features or artifacts are always a distinct possibility. Therefore care should be taken when development work commences that if any of these are uncovered, a qualified archaeologist be called in to investigate.

9. REFERENCES

Location map provided by Urban Nest

Aerial view of site location: Google Earth (image 2009)

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www.csg.dla.gov.za

Archival Sources

TAB: SS, Vol.153. 68/73

SAB: URU, Vol.128. 362

SAB: URU, Vol.179. 410

APPENDIX A

DEFINITION OF TERMS:

Site: A large place with extensive structures and related cultural objects. It can also be a large assemblage of cultural artifacts, found on a single location.

Structure: A permanent building found in isolation or which forms a site in conjunction with other structures.

Feature: A coincidental find of movable cultural objects.

Object: Artifact (cultural object).

(Also see Knudson 1978: 20).

APPENDIX B

DEFINITION/ STATEMENT OF HERITAGE SIGNIFICANCE:

- Historic value:** Important in the community or pattern of history or has an association with the life or work of a person, group or organization of importance in history.
- Aesthetic value:** Important in exhibiting particular aesthetic characteristics valued by a community or cultural group.
- Scientific value:** Potential to yield information that will contribute to an understanding of natural or cultural history or is important in demonstrating a high degree of creative or technical achievement of a particular period
- Social value:** Have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.
- Rarity:** Does it possess uncommon, rare or endangered aspects of natural or cultural heritage.
- Representivity:** Important in demonstrating the principal characteristics of a particular class of natural or cultural places or object or a range of landscapes or environments characteristic of its class or 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.

APPENDIX C

SIGNIFICANCE AND FIELD RATING:

Cultural significance:

- Low A cultural object being found out of context, not being part of a site or without any related feature/structure in its surroundings.
- Medium Any site, structure or feature being regarded less important due to a number of factors, such as date and frequency. Also any important object found out of context.
- High Any site, structure or feature regarded as important because of its age or uniqueness. Graves are always categorized as of a high importance. Also any important object found within a specific context.

Heritage significance:

- Grade I Heritage resources with exceptional qualities to the extent that they are of national significance
- Grade II Heritage resources with qualities giving it provincial or regional importance although it may form part of the national estate
- Grade III Other heritage resources of local importance and therefore worthy of conservation

Field ratings:

- National Grade I significance should be managed as part of the national estate
- Provincial Grade II significance should be managed as part of the provincial estate
- Local Grade IIIA should be included in the heritage register and not be mitigated (high significance)
- Local Grade IIIB should be included in the heritage register and may be mitigated (high/ medium significance)
- General protection A (IV A) site should be mitigated before destruction (high/ medium significance)
- General protection B (IV B) site should be recorded before destruction (medium significance)
- General protection C (IV C) phase 1 is seen as sufficient recording and it may be demolished (low significance)

APPENDIX D

PROTECTION OF HERITAGE RESOURCES:

Formal protection:

National heritage sites and Provincial heritage sites – grade I and II

Protected areas - an area surrounding a heritage site

Provisional protection – for a maximum period of two years

Heritage registers – listing grades II and III

Heritage areas – areas with more than one heritage site included

Heritage objects – e.g. archaeological, palaeontological, meteorites, geological specimens,
visual art, military, numismatic, books, etc.

General protection:

Objects protected by the laws of foreign states

Structures – older than 60 years

Archaeology, palaeontology and meteorites

Burial grounds and graves

Public monuments and memorials

APPENDIX E

HERITAGE IMPACT ASSESSMENT PHASES

1. Pre-assessment or scoping phase – establishment of the scope of the project and terms of reference.
2. Baseline assessment – establishment of a broad framework of the potential heritage of an area.
3. Phase I impact assessment – identifying sites, assess their significance, make comments on the impact of the development and makes recommendations for mitigation or conservation.
4. Letter of recommendation for exemption – if there is no likelihood that any sites will be impacted.
5. Phase II mitigation or rescue – planning for the protection of significant sites or sampling through excavation or collection (after receiving a permit) of sites that may be lost.
6. Phase III management plan – for rare cases where sites are so important that development cannot be allowed.