



17 March, 2020

Attention: Mr Andrew Salomon

Dear Andrew

RE: Letter of Recommendation for Exemption of a Heritage Impact Assessment (HIA) for the proposed Benoni Church located at 72 Springs Road Benoni Agricultural Holdings (A.H.), Gauteng province.

1. Introduction

Life Abundance Bible Church International is proposing to develop a vacant stand at 72 Springs Road, Benoni East A/H, Gauteng Province (Figure 1 – 3). The property comprises 2 hectares, but the planned development consists of approximately 500 square meters. Life Abundance Bible Church is applying for special consent at Ekurhuleni municipality to use the land that is currently zoned as Agriculture to use it for a place of worship (church).

The proposed project is located in an area that has been cultivated from 1939 (Figure 4 -8) and more recently excavated from 2013 (Figure 9 – 11) probably for sand mining. These activities have transformed the study area and would have impacted on surface indicators of heritage features if any ever existed in the area. The site has since been fallow and is covered in vegetation (Figure 12 – 14).

Due to the extensive transformation of the study area there is a very low likelihood that any sites of significance will be impacted on by the proposed project and it is recommended that the project can commence without an HIA on the condition that a chance find procedure is implemented as part of the EMPr and based on approval from SAHRA:

2. Project Description

The project comprises the development of a Church building with associated infrastructure. The property comprises 2 hectares, but the planned development consists of approximately 500 square meters well below the 5000 square meter threshold as stipulated in the NHRA.

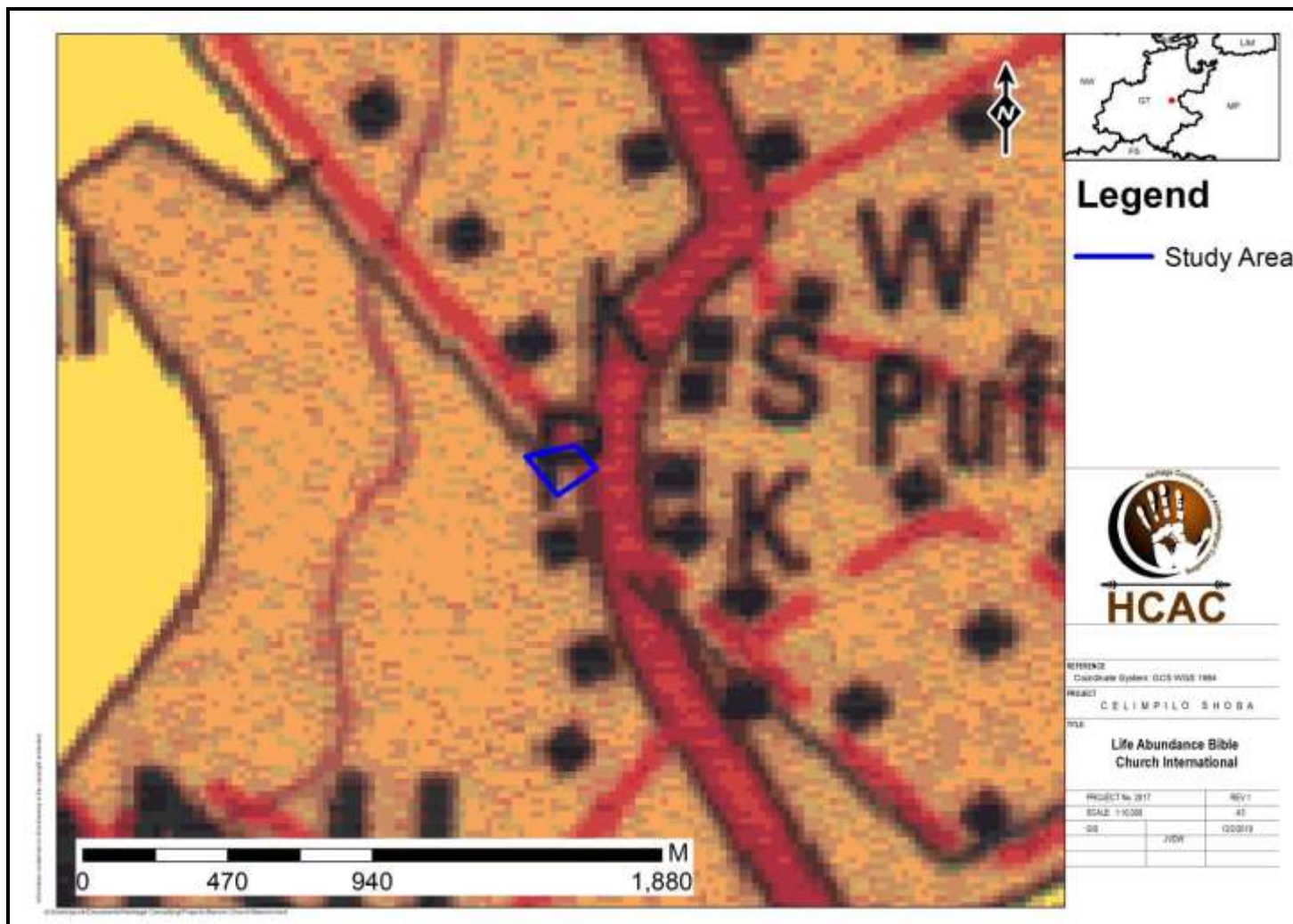


Figure 1. Regional setting (1: 250 000 topographical map)

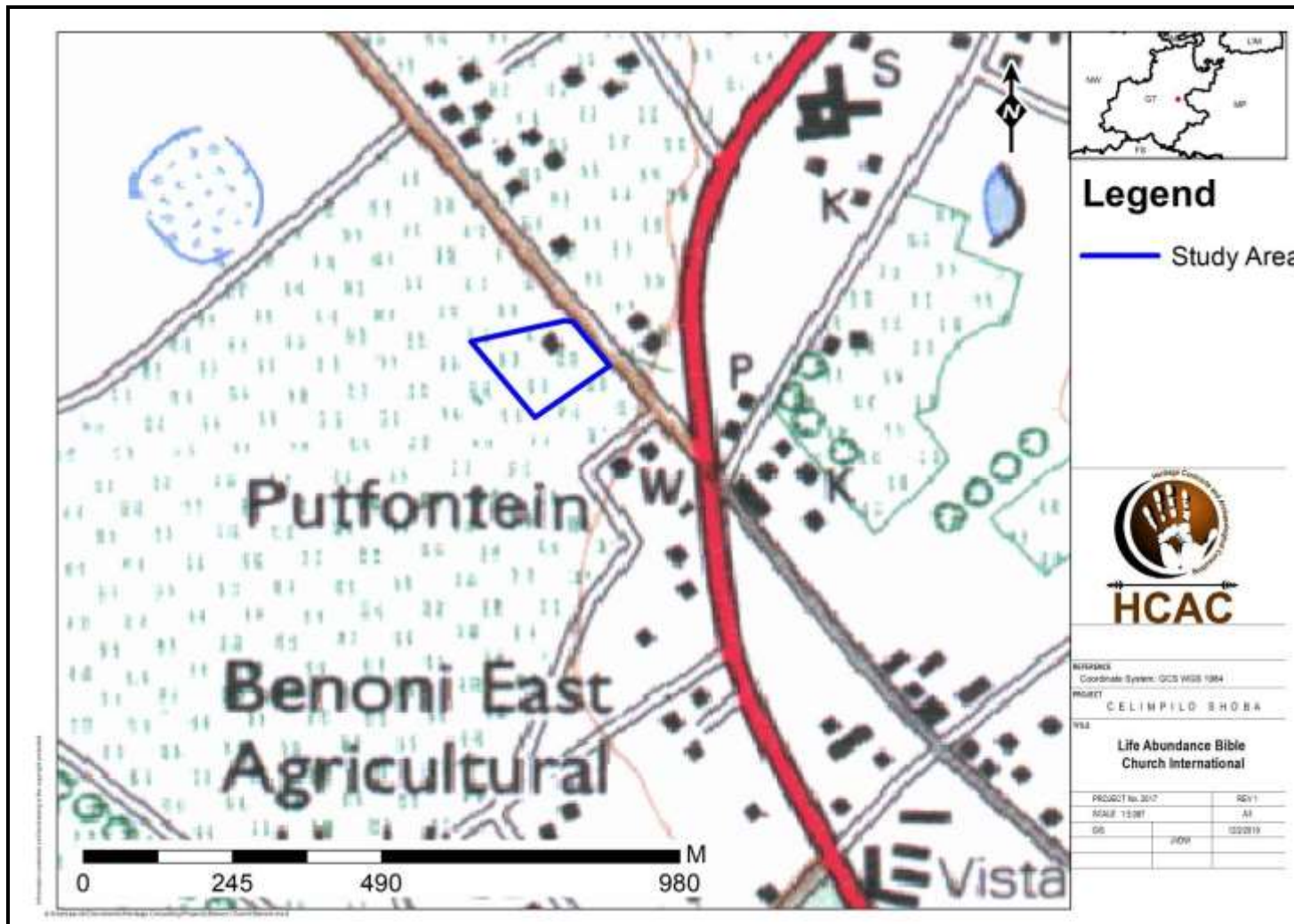


Figure 2. Local setting (1:50 000 topographical map).



Figure 3. Google Image of the study area.

3. The Heritage Character of the Study area

3.1. Literature review

Several CRM studies were conducted in the larger area and the findings help to contextualise the study area. The following studies were consulted for this project:

Author	Year	Project	Findings
Van Schalkwyk, J.	1997	A Survey of Cultural Resources in The Proposed Erwat Sewer Outfall Route, North of Springs, Gauteng Province	Cemeteries and structures
Van Schalkwyk, J.	2000	A Survey of Cultural Resources at The Proposed Glen Erasmia Development, Kempton Park, Gauteng	One archaeological site
Coetzee, F.	2006	Cultural Heritage Survey of Portion 1 of Portion 228 (a Portion of 213) and Portion 63 of the Farm Geduld 123 IR, Gauteng Province	Cemeteries
Huffman, T.N.	2012	Heritage Survey for The Witfontein Project, Gauteng	Several sites of archaeological and historical interest
Van der Walt, J.	2019	Heritage Impact Assessment Eastlands Estate, Benoni, Gauteng Province	Stone Cairns that could be graves

According to the Genealogical Society Database there are graves indicated to the north of the study area on the farm Putfontein. The graves are located well away from the study area and will not be impacted on.

3.2. Archaeological Background

The archaeological record for the greater study area consists of the Stone Age and Iron Age.

3.2.1. Stone Age

The Stone Age can be divided in three main phases as follows;

- Later Stone Age; associated with Khoi and San societies and their immediate predecessors. Recently to ~30 thousand years ago
- Middle Stone Age; associated with Homo sapiens and archaic modern humans. 30-300 thousand years ago.
- Earlier Stone Age; associated with early Homo groups such as Homo habilis and Homo erectus. 400 000-> 2 million years ago.

Although there are no well-known Stone Age sites located on or around the study area there is evidence of the use of the larger area by Stone Age communities for example along the Kliprivier where ESA and MSA tools were recorded. LSA material is recorded along ridges to the south of the current study area (Huffman 2008). Petroglyphs occur at Redan as well as along the Vaal River (Berg 1999).

3.2.2. The Iron Age

The Iron Age as a whole represents the spread of Bantu speaking people and includes both the pre-Historic and Historic periods. It can be divided into three distinct periods:

- The Early Iron Age: Most of the first millennium AD.
- The Middle Iron Age: 10th to 13th centuries AD
- The Late Iron Age: 14th century to colonial period.

The Iron Age is characterised by the ability of these early people to manipulate and work Iron ore into implements that assisted them in creating a favourable environment to make a better living. Extensive Stone walled sites are recorded at Klipriviers Berg Nature reserve belonging to the Late Iron Age period. A large body of research is available on this area. These sites (Taylor's Type N, Mason's Class 2 & 5) are now collectively referred to as Klipriviersberg (Huffman 2007).

These settlements are complex in that aggregated settlements are common, the outer wall sometimes includes scallops to mark back courtyards, there are more small stock kraals, and straight walls separate households in the residential zone. These sites date to the 18th and 19th centuries and was built by people in the Fokeng cluster. In this area the Klipriviersberg walling would have ended at about AD 1823, when Mzilikazi entered the area (Rasmussen 1978). This settlement type may have lasted longer in other areas because of the positive interaction between Fokeng and Mzilikazi.

3.2.3. Historical Information

Benoni dates back to 1881 when then surveyor-general Johan Rissik had trouble assigning title deeds to all unclaimed state property. He named a piece of the Government Farm Benoni, after the Hebrew name (meaning "son of my sorrow"), given by Rachel to her son (who later became known as Benjamin) in the biblical Book of Genesis. In September 1887, gold was discovered and the Chimes Mine was established by Cornishmen (<http://www.norval.co.za/history-of-benoni/>).

Sir George Farrar, the chairman of a mining company, undertook the planning of the rapidly growing mining town in 1904 (<http://www.norval.co.za/history-of-benoni/>). He named many of the streets, which run North-South, and Avenues, which run East-West, in honour of places and peoples of his fondest memories back in and around his hometown, Bedford in England. Howard Avenue was named after his grandfather who lived at Kempston Grange (spelt Kemston Avenue in Benoni) and who had taken the Farrar on horse rides around the historical Bunyan countryside. Many streets have been renamed since.

A river was dammed to create a series of reservoirs for mine use (<http://www.norval.co.za/history-of-benoni/>). Benoni was established as a municipality on 1 October 1907 (Van Schalkwyk 2014). Trees were also planted in the new mining district. Most residents were British miners and the town also had a strong Jewish population (due to anti-Semitism in Eastern Europe). The first synagogue and the Benoni Race Track were opened in 1907 (<http://www.norval.co.za/history-of-benoni/>). In 1922, the Rand Revolt (or 1922 Strike) broke out throughout the mines on the Witwatersrand and thousands of white miners went on strike. The strike quickly degenerated into open revolt, with armed miners fighting the South African police and army in the streets. Benoni was used as one of the headquarters of the miners and much fighting took place in and around the area. During World War II, the South African Airforce trained pilots in Benoni (<http://www.norval.co.za/history-of-benoni/>). In 1957, in an effort to introduce the sport of rugby league to South Africa, Great Britain and France played the first of a series of three exhibition matches in Benoni (<http://www.norval.co.za/history-of-benoni/>).

3.2.4. Anglo-Boer War

An Anglo Boer War battle known as the Battle of Doornkop took place in the greater area on 29 May 1900. The British led by General John French were advancing towards Johannesburg led by De La Rey and his men held the Klipriviersberg Ridge for the first two days, but on the third day the Boers were outflanked by French's cavalry to the West, where General Sarel Oosthuizen's commando was forced to withdraw. This opened the road to Johannesburg and the British took the city peacefully on 30 May 1900 (Bikholtz 2013). Huffman (2008) recorded several sangens dating to the Boer war close to Alberton on a ridge.

3.2.5. Cultural Landscape

The site is located on a vacant stand at 72 Springs Road, Benoni East A/H, Gauteng Province. The area is indicated as cultivated from 1939 onward.

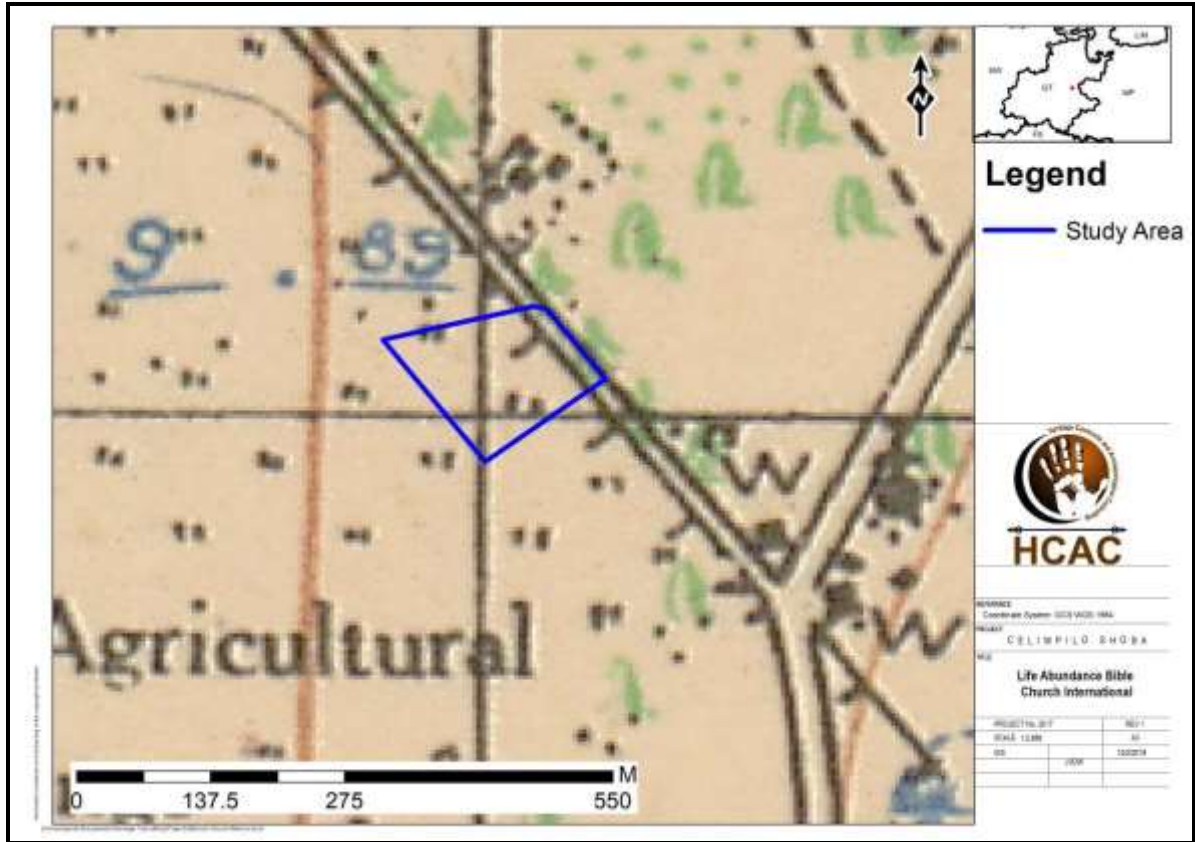


Figure 4. 1939 Topographical map indicating the study area. The area is cultivated.

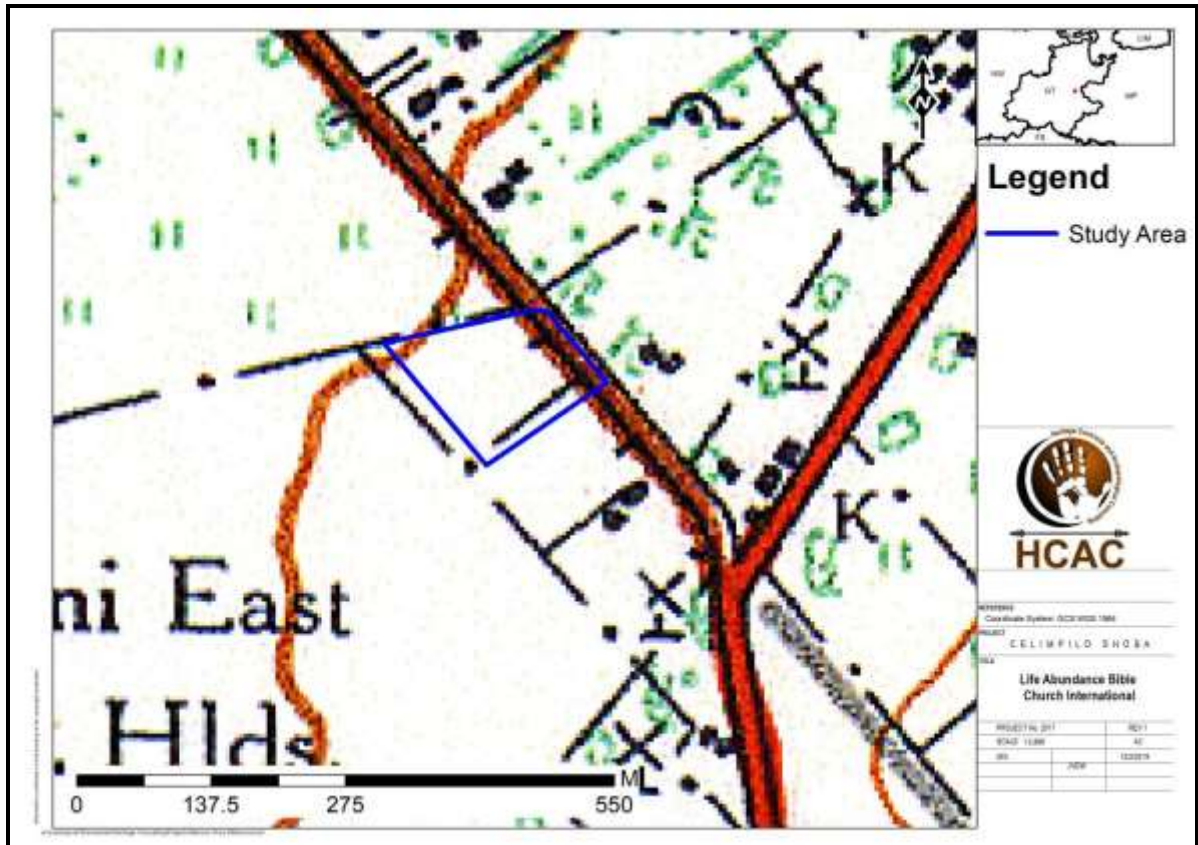


Figure 5. 1957 Topographic map of the study area – no developments are indicated in the study area.

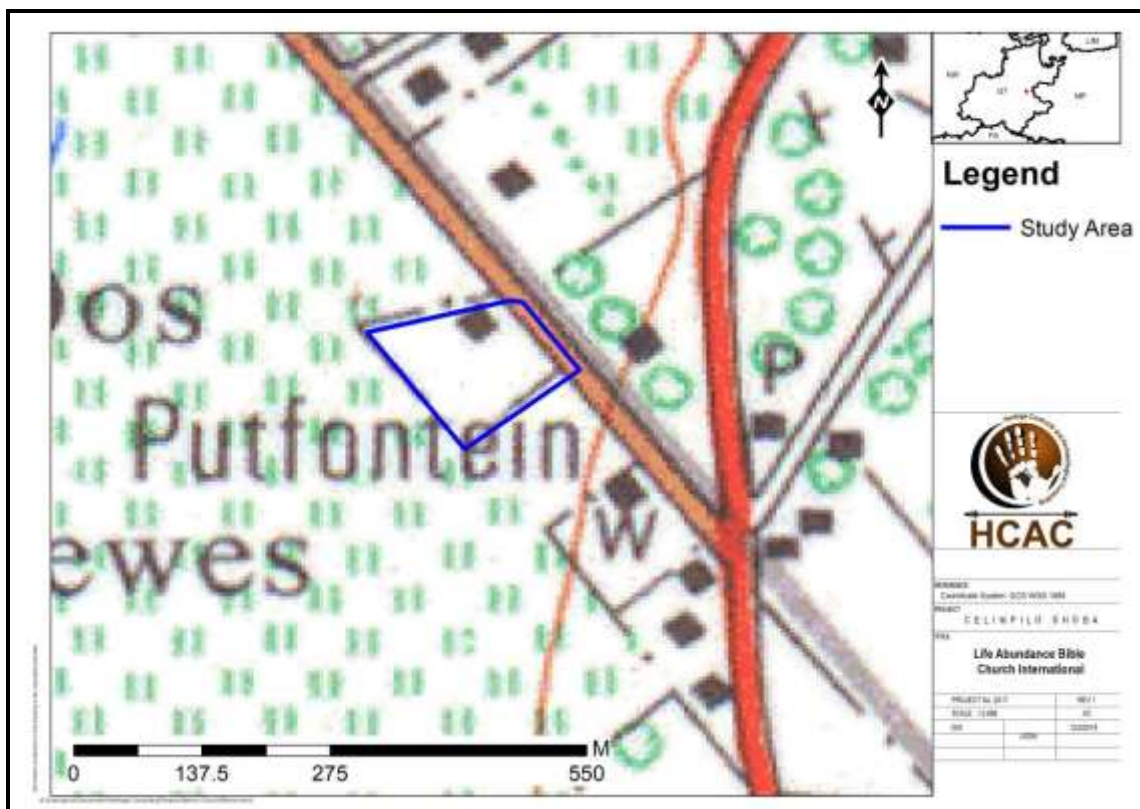


Figure 6. 1976 Topographic map of the study area – a structure is visible in the study area.

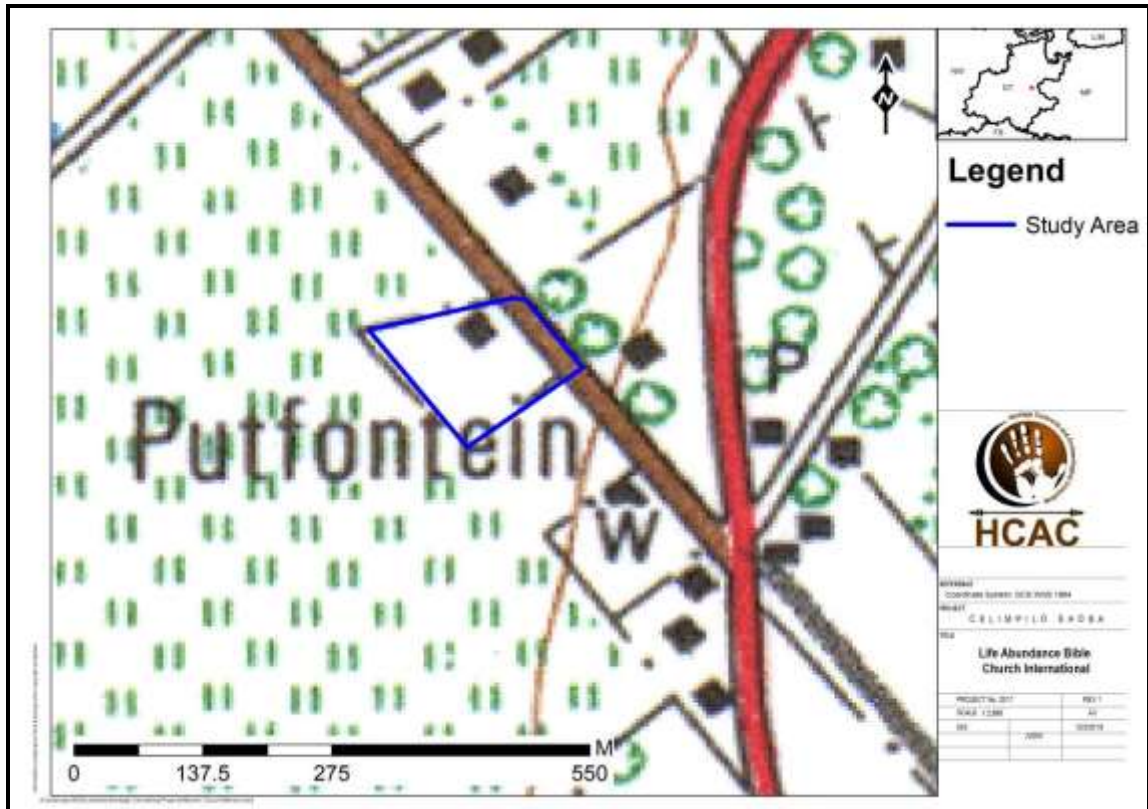


Figure 7. 1983 Topographic map of the study area. The structure is visible in the study area.

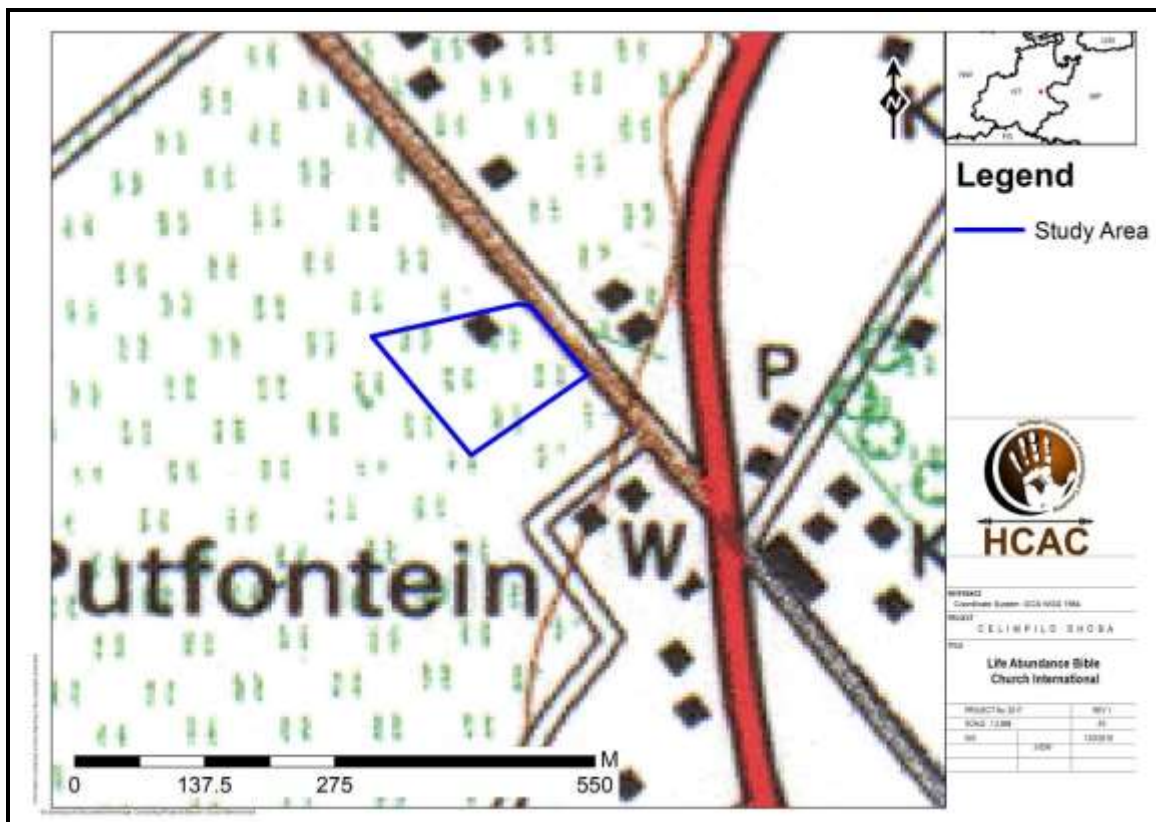


Figure 8. 1995 Topographic map. The area is cultivated and a structure is visible.

4. Findings

The proposed project is located in an area that has been cultivated from 1939 (Figure 4 -8) and more recently excavated from 2013 (Figure 9 – 11) probably for sand mining. These activities have transformed the study area and would have impacted on surface indicators of heritage features if any ever existed in the area. The site has since been fallow and is covered in vegetation (Figure 12 – 14).



Figure 9. 2013 Google Earth image of the study area indicating a large excavation.



Figure 10. 2015 Google Earth image – the area is extensively disturbed.



Figure 11. 2018 Google Earth image of the study area – the area is being rehabilitated.



Figure 12. General site conditions



Figure 13. General site conditions.



Figure 14. General site conditions.

No standing structures older than 60 years occur on site and therefore in terms of Section 34 of the act no mitigation is required prior to development. During the development of the site and the surrounding area all surface indicators of archaeological resources would have been obliterated. No mitigation is required prior to development in terms of the archaeological component of Section 35 of the NHRA. No known burials occur in the study area.

The study area is indicated as of very high significance on the SAHRA paleontological map (Figure 15). Due to the existing disturbance of the site it is not expected that surface indicators are still visible. However, based on approval from SAHRA, more work might be required for this aspect.



Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	Desktop study is required
BLUE	LOW	No palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

Figure 15. Paleontological sensitivity of the study area as indicated on the SAHRA Paleontological Map.

5. Conclusion

From a heritage perspective the study area is degraded and there is a low likelihood that any sites of significance will be impacted on by the proposed project. It is therefore recommended that the project is exempted from an HIA but that a chance find procedure as outlined below and a paleontological protocol for finds should be included in the EMP.

5.1. Chance find procedure

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist or palaeontologist must be contacted for an assessment of the find. A short summary of chance find procedures is discussed below

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 fossil material, 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 or palaeontologist for an assessment of the finds who will notify the SAHRA.

Any further queries can be forwarded to Jaco van der Walt on Cell: +27 82 373 8491 or to jaco@heritageconsultants.co.za.

A handwritten signature in black ink, appearing to read 'Jaco van der Walt', with a stylized flourish at the end.

Jaco van der Walt
Archaeologist
Heritage Contracts and Archaeological Consulting CC (HCAC)

6. References

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