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17 August, 2021

Attention: **Mr Andrew Solomon**

SAHRA Case Officer Gauteng

South African Heritage Resources Agency (SAHRA)

Dear Mr Solomon

APPLICATION FOR EXEMPTION FROM A HERITAGE IMPACT ASSESSMENT FOR 128 GRIFFITHS STREET, EQUESTRIA

1. Introduction

Exigent Environmental Consultants was appointed by Bastion Development group as Environmental Assessment Practitioner to manage the Environmental Impact Assessment process for the housing development at 128 Griffiths Street. As part of the process Beyond Heritage was appointed to provide an assessment of the possible impacts on heritage resources. The assessment consists of a desktop study as well as a site visit to the study area.

The project area is located at 128 Griffiths street within the Equestria suburb of Pretoria, Gauteng (Figure 1.1 to 1.3). Prior to 1975 the property was characterized by open fields with some road infrastructure in the surrounding areas. By the 1990's, residential dwellings were constructed on the property and the surrounding suburb was developed after this.

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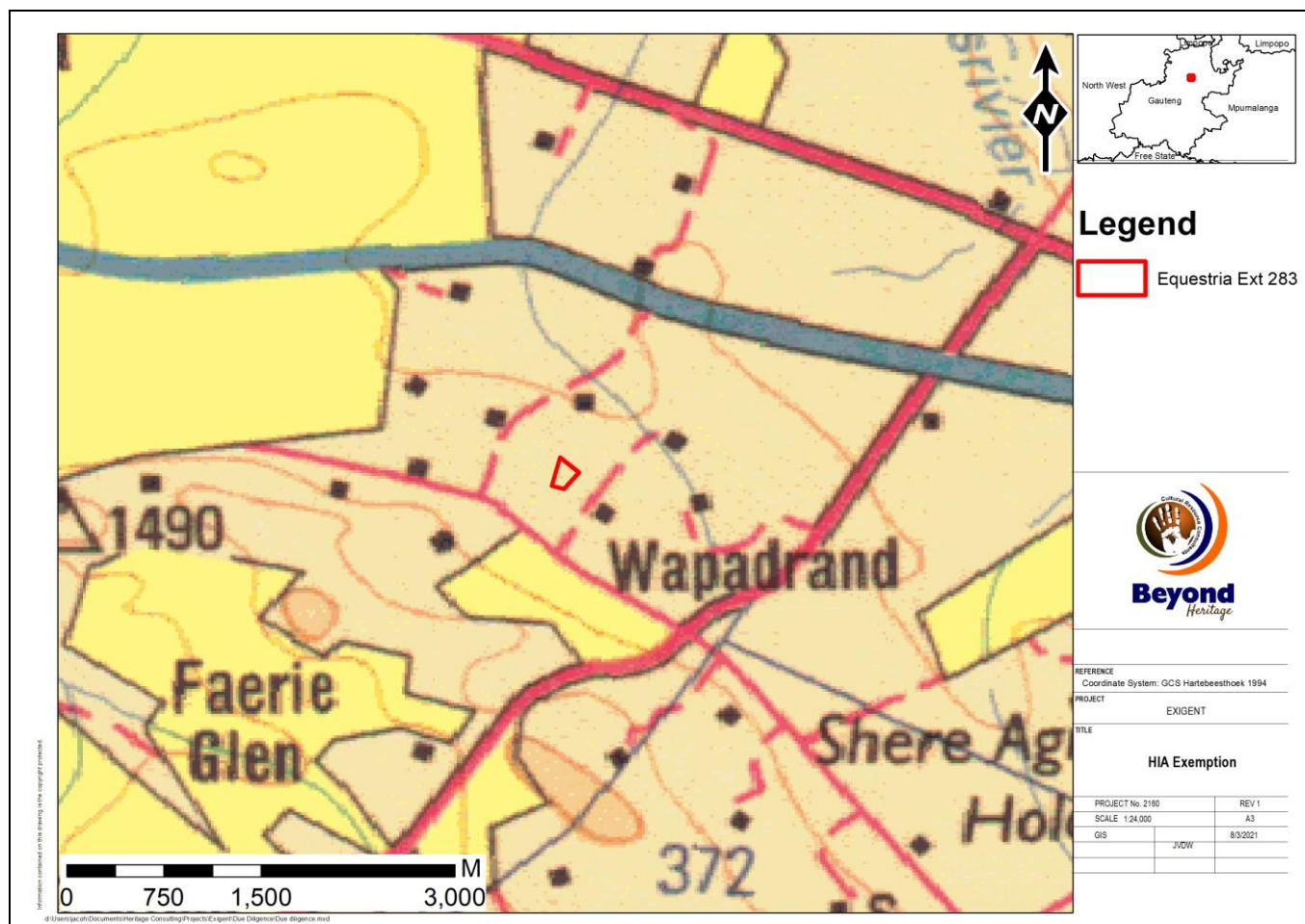


Figure 1.1. Regional setting of the project (1: 250 000 topographical map).

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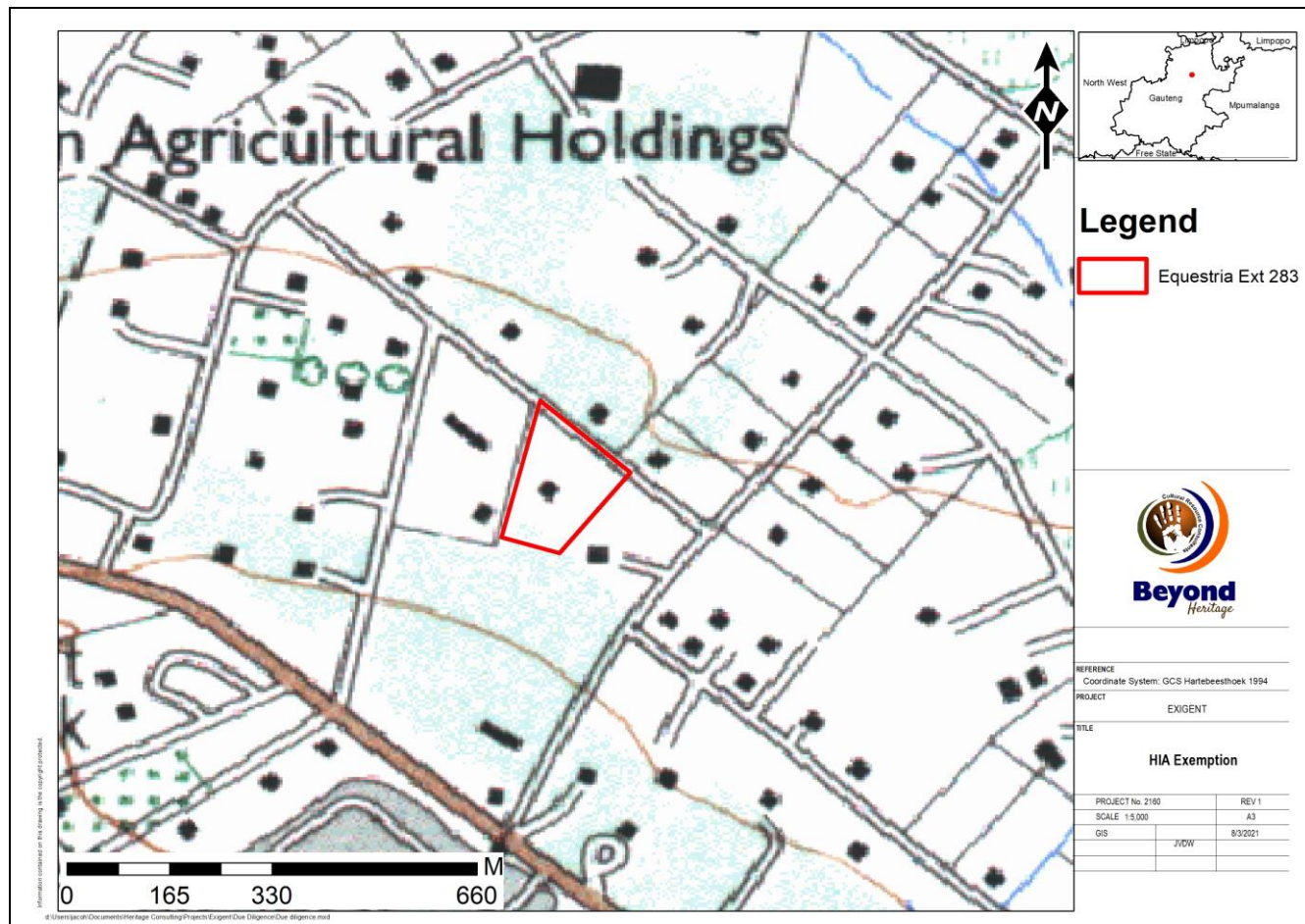


Figure 1.2. Local setting of the project (1: 50 000 topographical map).

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Figure 1.3. Aerial image of the study area. Note the extent of surrounding developments.

2. The Heritage Character of the Study area

2.1. Literature review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

2.1.1. Background to the general area

In the greater Pretoria area an Early Stone Age Terrain, known as Wonderboompoort has been identified. This area 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). Another well-known Iron Age site is the early Iron Age Site of Derdepoort where a small collection of ceramics was uncovered dating back to the 4th to 7th century AD (Nienaber et al 1997). Late Iron Age sites are also associated with Southern Ndebele sites and occur in the surrounding areas. These sites are found in the area between Wallmannsthal and Roodeplaat Dam and also along the Pienaars River to the south of the N4 Highway (Birkholtz 2009).

According to Birkholtz (2009) the Manala Ndebele moved from Ezotshaneni to a place known as Embilaneni (place of Dassies) in 1717. The new settlement spread over the Bronberg mountains east of Pretoria and

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included an area that can be defined by a number of present-day farms. The Embilaneni settlement was occupied over a period of 30 years between 1717 and 1747.

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). 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).

2.1.2. CRM reports

The following CRM reports were conducted in the vicinity of the study area and consulted for this study:

Author	Year	Project name	Findings
Van Schalkwyk, J & De Jong, R.	1998	A Survey of Cultural Resources in The Nellmapius Extension 4 Urban Development, East of Pretoria, Gauteng Province	No sites were identified.
Van Schalkwyk, J	2003	Heritage Resources in The Western Section of The Kungwini Local Municipality, Gauteng Province	Stone Age occurrences as well as Iron Age sites.
Kusel, U.	2004	Faerie Glen and Wapadrand Country Estate Portions 349-351	Stone Walled sites
Roodt, F.	2005	Phase 1 Heritage Impact assessment on Portion 182 and 209 of the farm Zwavelpoort 373 JR.	Historical structures and a grave
Coetzee, F.	2008	Cultural Heritage Survey of the Proposed Residential Development on Portions 281, 282 and 283 of the Farm Zwavelpoort 373JR, Tshwane Municipality	Structures older than 60 years.

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located. LIA sites can be expected along foothills and dolerite dykes.

2.1.3. Society and Google Earth Monuments

No known grave sites are indicated close to the study area.

2.2. Battles close to the study area

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.

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The Boer side generally lost ground against the British in this area 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).

The battle of Diamond hill took place to the east of the study area a couple of days later. The battle is also referred to as the battle of Donkerhoek. Lord Roberts and his army occupied Pretoria and expected the Boers to surrender, the Boers however moved their capital to Machadodorp and went to great lengths to protect the railway line to prevent the British from moving east toward Machadodorp. General Louis Botha strategically positioned 3500 men in the hills in areas where he expected the British would try and pass. The British advanced toward Botha's forces with 5000 mounted men and 8000 infantry including about 70 guns. The British stated their aims to be to clear the Boers from the Pretoria area. The British attacked both ends of the Boer line on 11 June 1900. Their infantry and artillery advanced toward the centre of the position. The next day the British launched a strong attack on the Boers and improved their position which forced the Boers to flee. The Boers lost 30 men (11 were killed) and the British suffered 180 casualties. The Boers left with a sense of victory and the determination to continue to fight. The war lasted 2 more years and guerrilla warfare was characteristic of the war. Another 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.

2.3. Cultural Landscape

The project area was fallow in the 1960's part of the development of agricultural holdings in the area with the development of road infrastructure in the surrounding areas. The area is now densely developed (Figure 2.1 – 2.4) with an urban character underlined by the intensive residential developments of the surrounding area.

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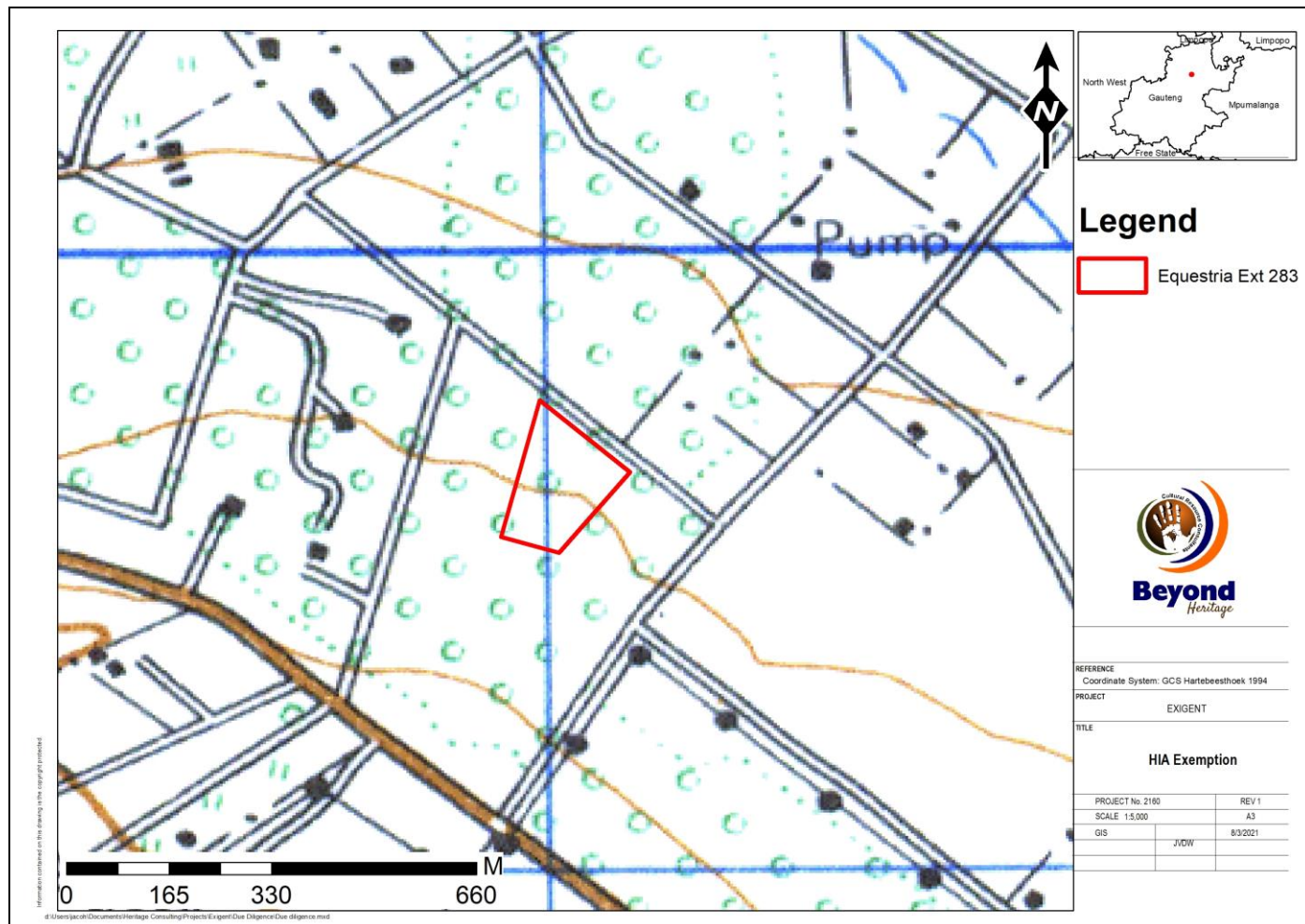


Figure 2.1. 1964 Topographical map of the study area. The study area and surrounds are situated within open fields.

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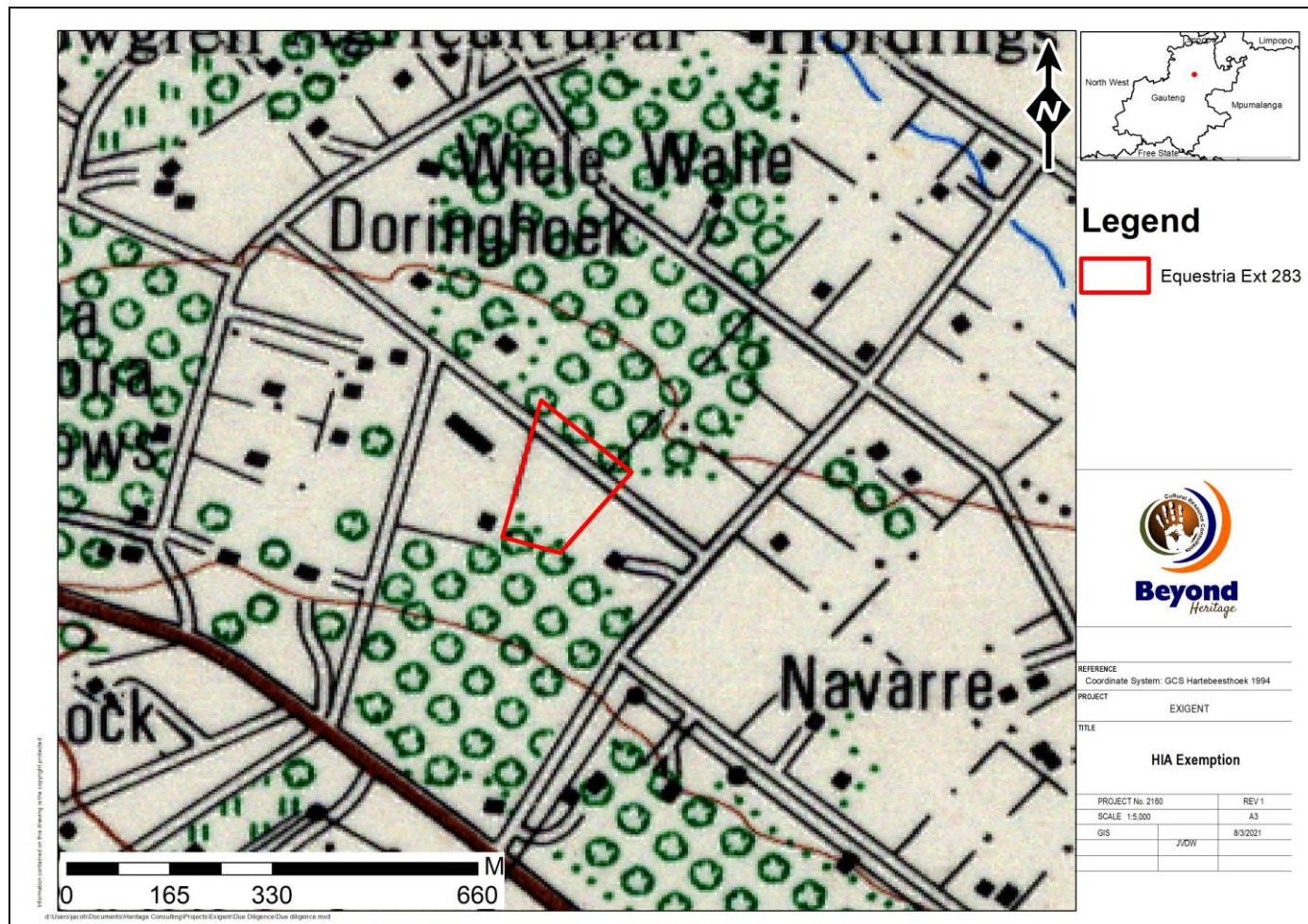


Figure 2.2. 1975 Topographical map of the project area and surrounds showing residential dwellings on neighbouring properties with the impact area still undeveloped.

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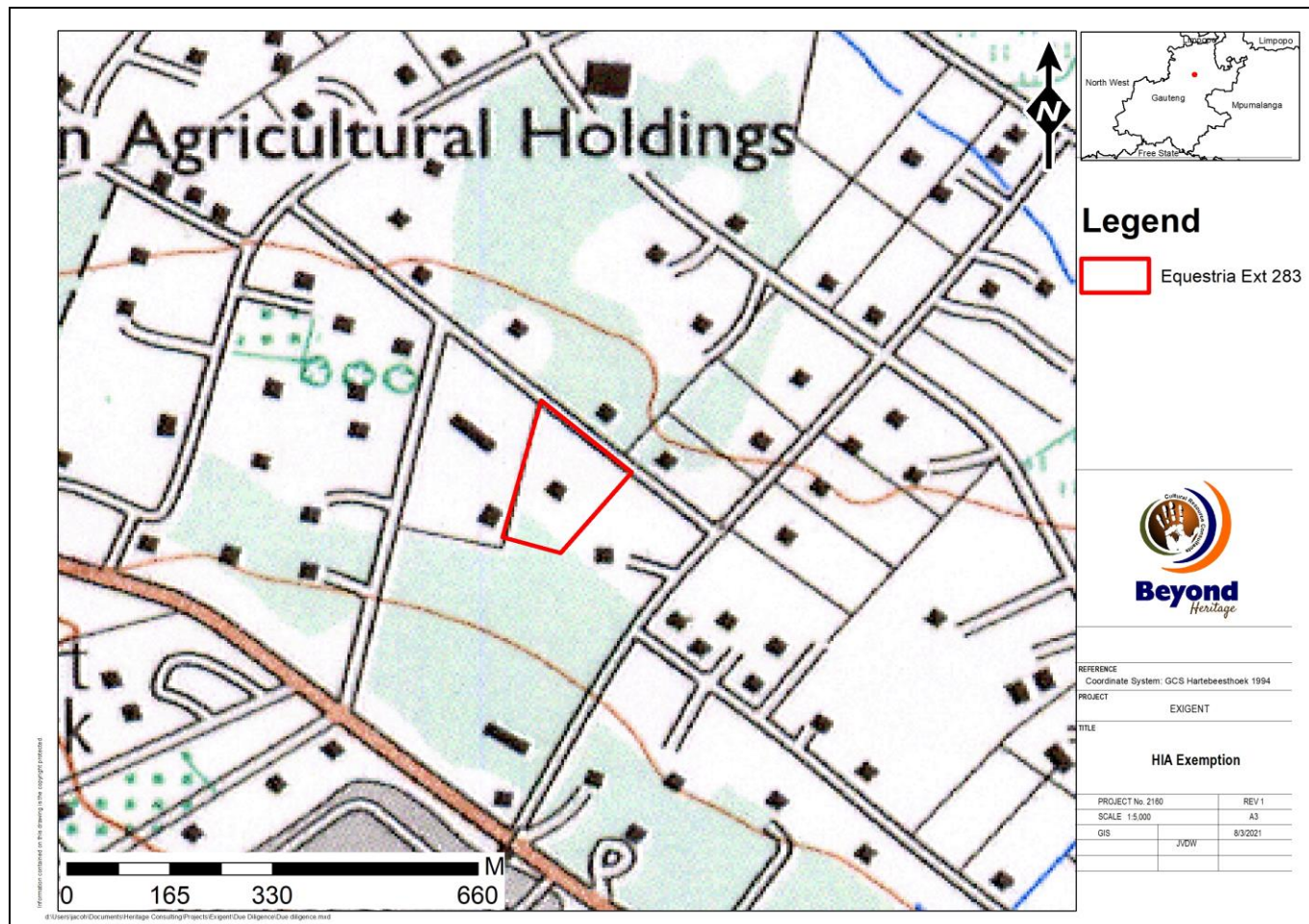


Figure 2.3. 1991 Topographical map of the impact area indicating the development of the project area with a residential dwelling.

3. Findings

The project area was visited on the 3rd of August and was sufficiently covered to understand the heritage character of the area. The project is located on approximately 24 400m² (2,44 ha) of land within the Equestria suburb of Pretoria, Gauteng. The property is characterised by modern residential dwellings with well-maintained manicured gardens (Figure 3.1 to 3.4). According to historical topographic maps, the structures were constructed sometime after 1975 (probably closer to the 1990's). No historical or archaeological material or features were noted during the site visit.

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Figure 3.1. Current site conditions.



Figure 3.2. Current site conditions.



Figure 3.3. Modern structures in the study area.



Figure 3.4. Modern structures in the study area.

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3.1. Paleontology

Based on the SAHRA paleontological map the study area is of high sensitivity (Figure 3.5) and an independent palaeontological study was conducted for the project (Bamford 2021). The study concluded it is extremely unlikely that any fossils would be preserved in the shales of the Silverton Formation (Pretoria Group, Transvaal Supergroup) because the rocks are ancient and were deposited in a high energy environment where neither stromatolites would grow nor microbial mats form. According to the Palaeotechnical Report fossil stromatolites are present, therefore, a Fossil Chance Find Protocol should be added to the EMPr (Bamford 2021).



Figure 3.5. Paleontological sensitivity of the approximate study area (blue polygon) as indicated on the SAHRA Paleontological Map (Key below)

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.

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4. Conclusion

The study area has been impacted upon by the extensive development of the project site and surrounding areas and the area is therefore of low heritage potential. The impact of clearing, levelling and construction activities would have obliterated any indicators of heritage resources if any ever occurred in the study area. This was confirmed during a site visit to the project area, and it is unlikely that the project would impact on significant heritage resources. Therefore, an application for exemption from further heritage studies is supported with the implementation of a fossil chance find protocol in the EMPr.

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

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