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6 September, 2021

Attention: Mr Andrew Salomon (asalomon@sahra.org.za) SAHRA Case Officer Gauteng South African Heritage Resources Agency (SAHRA)

Dear Mr Salomon

# RE: Branscombe S24G Heritage Exemption

#### Introduction

Enviro-Insight CC was appointed by Branscombe Pty Ltd (Branscombe) as Environmental Assessment Practitioner to manage the Section 24G rectification process for the unlawful commencement of construction of recreational facilities and associated infrastructure, including parking bays, recreational accommodation for guests, staff accommodation, as well as a workshop and private facilities for the applicant's personal use. As part of the process Beyond Heritage was appointed to provide an assessment of the impact on possible heritage resources.

The extensive development activities associated with the development of the area from the 1960's onwards would have obliterated any surface indicators of heritage sites or features if any ever occurred in the area. Topographic maps and satellite images clearly show that no structures older than 60 years or archaeological stone walled sites associated with the Ndebele occupation of the larger area occurred in the project site and these activities would not have impacted on any heritage resources and no remedial action or mitigation is needed.

## 1. Project Background

The project area is located on Portion 1071 (a portion of Portion 158) of the Farm Zwavelpoort 373 JR, City of Tshwane Metropolitan Municipality (Figure 1 to 3). Branscombe purchased the property, in 2017 and proceeded with the town planning application and construction of the facilities unaware that the process triggered activities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and associated regulations.

During the town planning application process Branscombe became aware that the construction of the facilities will require environmental authorisation, all construction activities were ceased. The Gauteng Department of Agriculture and Rural Development (GDARD) was contacted in 2020 and the applicant, realising the contravention, commenced with the Section 24G Application Process (S24G).

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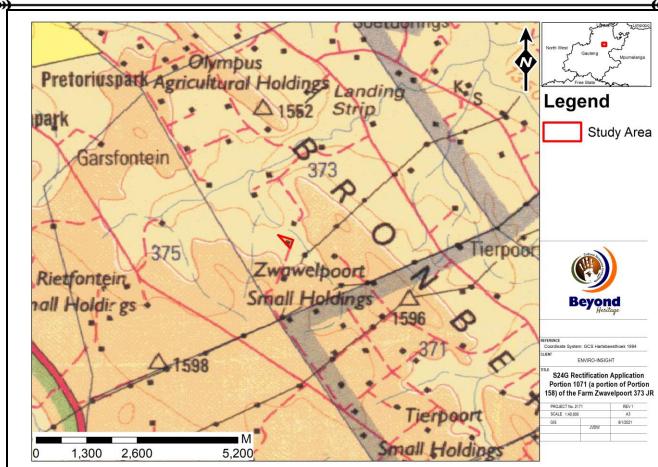


Figure 1. Regional setting of the project (1: 250 000 topographical map).

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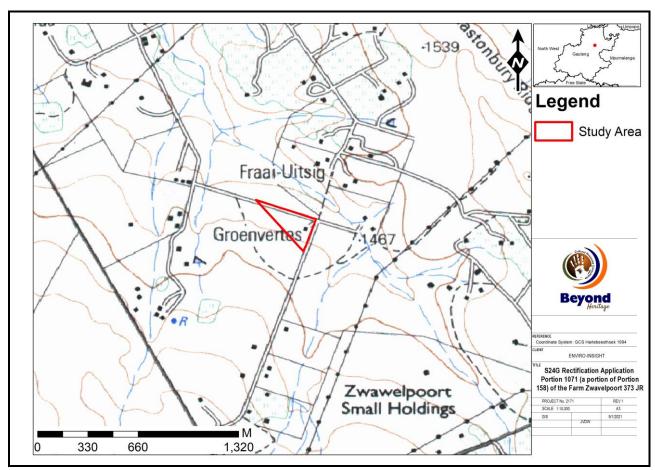


Figure 2. Local setting of the project (1: 50 000 topographical map).

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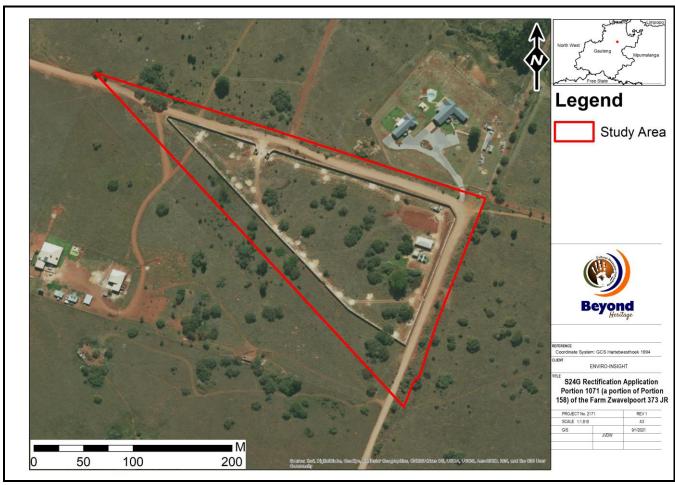


Figure 3. Aerial image of the study area before the majority of unlawful activities commenced.

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## 2. The Heritage Character of the Study area

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. Literature review

The following studies were conducted in the general vicinity of the project and were consulted for this report:

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

## 2.2. Background Study

None of the sites recorded as outlined under section 2.1 are near the study. 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 (Birkhotz 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 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.

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## Society and Google Earth Monuments

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

#### 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. 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

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The project is in an area that has seen limited developed from the 1940's onward (Figure 4 to 6) and is rural in character.

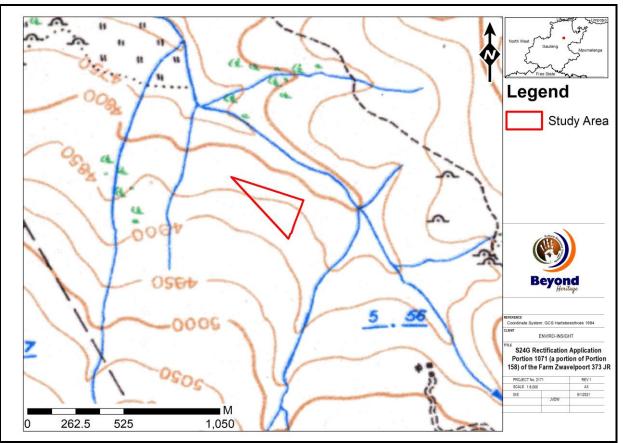


Figure 4. 1944 Topographical map of the study area. No development or possible heritage features are indicated in the study area and immediate surrounds.

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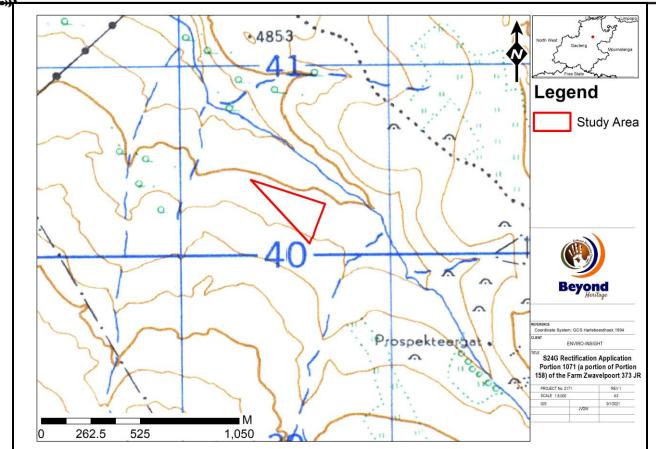


Figure 5. 1964 Topographical map of the project area. No development or possible heritage features are indicated in the study area and immediate surrounds.

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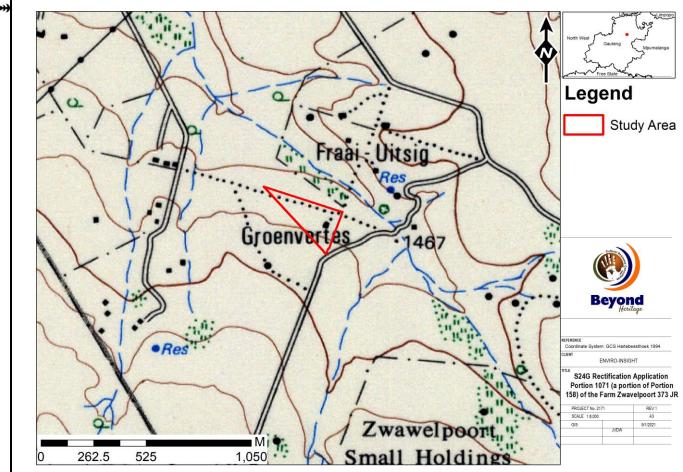


Figure 6. 1975 Topographical map of the project area. A residential dwelling and dirt road are indicated.

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#### 3. Findings

The project is located on approximately four hectares of land that has been significantly altered by the current developments in the study area. Several modern buildings, landscaped gardens and orchards characterise the study area (Figure 7 to 10). The study area was fallow prior to 1975 as indicated on topographic maps (Figure 4 to 6) until a dwelling was constructed. This building was subsequently demolished prior to the existing developments as can be seen from Google earth images of the study area (Figure 11 & 12). These images also show that no archaeological stone walls associated with the Ndebele occupation of the area occurred prior to development of the site. The study area is indicated as of moderate palaeontological significance on the SAHRA paleontological map (Figure 13), and an independent study was commissioned for this aspect (Bamford 2021). The study concluded that the site lies on the non-fossiliferous volcanic rocks of the Hekpoort Formation (Pretoria Group, Transvaal Supergroup) even though it is indicated as moderately fossiliferous on the SAHRIS Paleontological sensitivity map. It is extremely unlikely that fossils could have been present in the project footprint and it is recommended that the Section 24G application be granted, as far as the palaeontology is concerned.

It is unlikely that the developments in the project area impacted on any heritage features of significance and no further remedial action, or mitigation is recommended.



Figure 7. Modern buildings on site.



Figure 8. Modern buildings on site.



Figure 9. Cultivation in the western section of the study area.



Figure 10. Current site conditions

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Figure 11. 2016 Google image of study area.



Figure 12. 2021 google image of the study area.

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Figure 13. 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	нідн	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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The study area has been impacted upon by the extensive development of the project site. The impact of clearing, levelling and construction activities would have obliterated any surface indicators of heritage resources if any ever occurred in the study area. Topographic maps and satellite images clearly show that no structures older than 60 years or archaeological stone walled sites associated with the Ndebele occupation of the larger area occurred in the project site prior to development and it is unlikely that the unlawful activities impacted on any sites of significance and no further remedial action, or mitigation is needed. Bamford (2021) indicated that it is extremely unlikely that fossils could have been present in the project footprint and recommended that the Section 24G application be granted, as far as the palaeontology is concerned.

Therefore, an application for exemption from further heritage studies is supported.

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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