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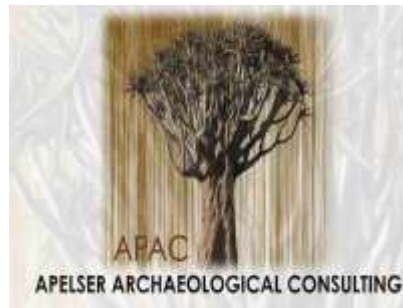
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Comprehensive and Professional Solutions for all Heritage Related Matters  
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**APAC020/25**

**2020-03-16**

To: Mr. Andrew Salomon  
**South African Heritage Resource Agency**  
**P O Box 4637**  
**Cape Town**  
**8000**

**RE: MOTIVATION FOR EXEMPTION FROM FULL PHASE 1 HERITAGE IMPACT ASSESSMENT – PROPOSED CLAYVILLE TRUCK YARD, PORTIONS 55 & 56 OF ERF 1015, CLAYVILLE EXTENSION 11, GAUTENG.**

APelser Archaeological Consulting cc (APAC cc) was appointed by Bokamoso Landscape Architects & Environmental Consultants CC to provide a motivation for Exemption from a Full Phase 1 HIA for the proposed Clayville Truck Yard on Portions 55 and 56 of Erf 1015 in Clayville Extension 11. The proposed development and study area are located in Clayville near Olifantsfontein in the Ekurhuleni Metropolitan Municipality of Gauteng and on a portion of the original farm Olifantsfontein 402JR.

### ***Background to the Project***

Coca Cola Beverages South Africa proposed the development of a Truck Yard on Portions 55 & 56 of Erf 1015 in Clayville Extension 11 in the Ekurhuleni Metropolitan Municipality of Gauteng.

“In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that prior to development it is incumbent on the developer to ensure that a Heritage Impact Assessment is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.

The quickest process to follow for the archaeological component is to contract an accredited specialist (see the web site of the Association of Southern African Professional Archaeologists [www.asapa.org.za](http://www.asapa.org.za)) to provide a Phase 1 Archaeological Impact Assessment Report. This must be done before any large development takes place. The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the

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specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary. Please note that a nationwide fossil sensitivity map is available on SAHRIS to assist applicants with determining the fossil sensitivity of a study area.

***If the property is very small or disturbed and there is no significant site the heritage specialist may choose to send a letter to the heritage authority motivating for exemption from having to undertake further heritage assessments.*** Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.”

Last mentioned option was decided on for this project which entailed desktop research as part of the assessment. Previous work by the author of this Exemption Letter also serves as reference.

### ***Relevant Legislation***

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).

### **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; and
- i. Objects, structures and sites of 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. Sites of Archaeological and palaeontological importance;
- g. Graves and burial grounds;
- h. Sites of significance relating to the history of slavery; and
- 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 (AIA) only looks at archaeological resources. According to Section 38 (1) of the Act 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 000m<sup>2</sup> or involve three or more existing erven or subdivisions thereof.
- d. Re-zoning of a site exceeding 10 000m<sup>2</sup>.
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority.

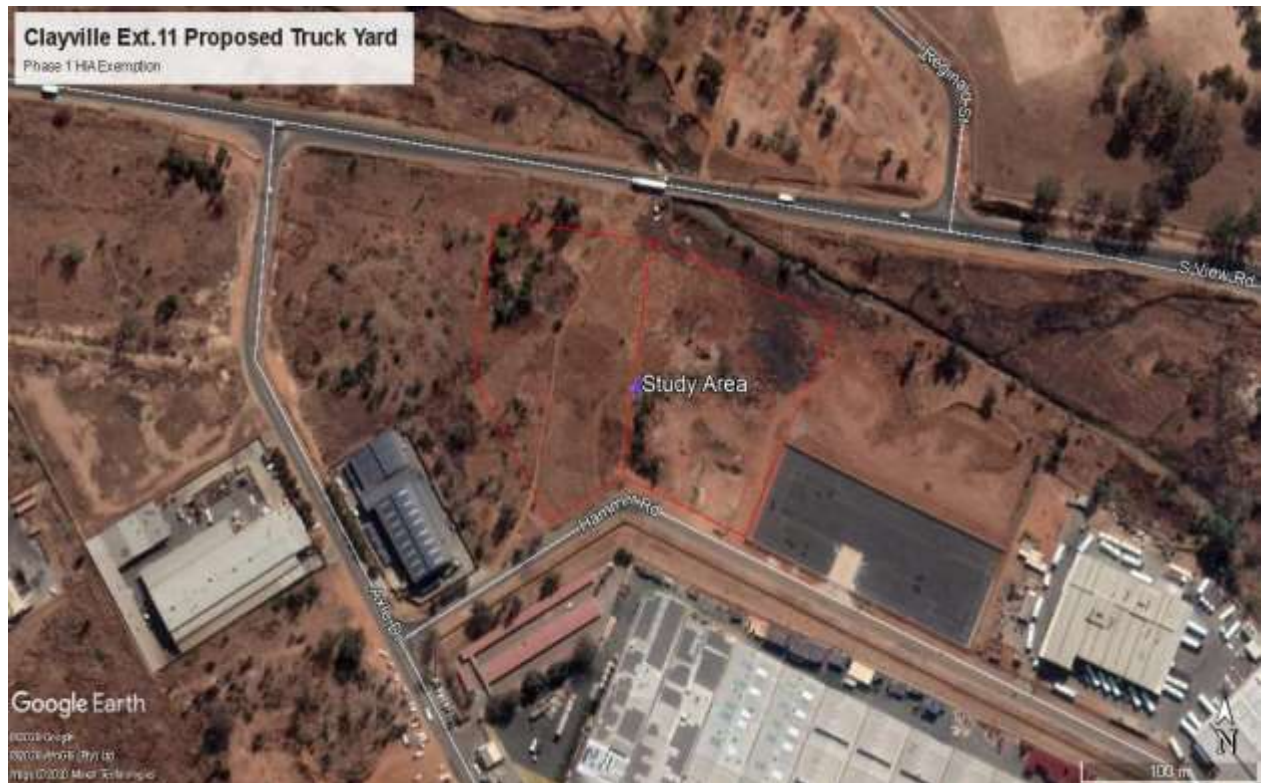
### **Results of Desktop Heritage Assessment: Proposed Clayville Truck Yard**

The development area is located on Portions 55 & 56 of Erf 1015 in Clayville Extension11. It is also located on a portion of the original farm Olifantsfontein 402JR. The study area is surrounded by already established and on-going residential, industrial and other urban developments. The topography of the study area is flat and open with no visible rocky ridges or outcrops.

The area would have been utilized in the historical past for agricultural purposes, while recent urban developments would have impacted on any archaeological and/or historical sites, features or material that might have been present in the area. Aerial images of the area (Google Earth) also shows the relative flat, open and disturbed nature of the area and the likelihood of any sites, features or material of cultural heritage significance being present, is slim.



**Figure 1: General location of study area (Google Earth 2020).**



**Figure 2: A closer view of the study area location & footprint. Note the disturbed nature of the area (Google Earth 2020).**



**Figure 3: View of the study and development area in 2003. No sites or structures are visible (Google Earth 2020).**

The Stone Age is the period in human history when lithic (stone) material was mainly used to produce tools. In South Africa the Stone Age can be divided basically into three periods. It is however important to note that dates are relative and only provide a broad framework for interpretation. A basic sequence for the South African Stone Age (Lombard et.al 2012) is as follows:

Earlier Stone Age (ESA) up to 2 million – more than 200 000 years ago

Middle Stone Age (MSA) less than 300 000 – 20 000 years ago

Later Stone Age (LSA) 40 000 years ago – 2000 years ago

It should also be noted that these dates are not a neat fit because of variability and overlapping ages between sites (Lombard et.al 2012: 125).

**There are no known Stone Age sites or features in the specific study area, and no material were identified during previous assessments in the Clayville area by the author of this document (Pelser 2013 & 2018).** It should be noted that it is possible that single out of context tools could be located in the area. The closest known Stone Age sites in the larger geographical area are located at Zwartkops, at the Hennopsrivier, Glenferness, Pietkloof and Zevenfontein. These sites are all dated to the Later Stone Age (Bergh 1999: 4).

The Iron Age is the name given to the period of human history when metal was mainly used to produce metal artefacts. In South Africa it can be divided in two separate phases (Bergh 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.

The closest known Iron Age sites to the area are those of Melville Koppies and Bruma Lake (Bergh 1999: 7) dating to the Late Iron Age. There are no known Early Iron Age sites in the larger area (Bergh 1999: 6-7).

**No Iron Age sites, features or material were identified in the Clayville area during earlier assessments (Pelser 2013 & 2018).**

The historical period started with the moving into the area of people who could read and write (European travellers, missionaries, the Voortrekkers). The first Europeans to move into and close to the study area were the groups of Moffat & Archbell in 1829, followed by Cornwallis Harris in 1836 and then by David Livingstone in 1847 (Bergh 1999: 12-13). They were followed closely by the Voortrekkers and European farmers (p. 14).

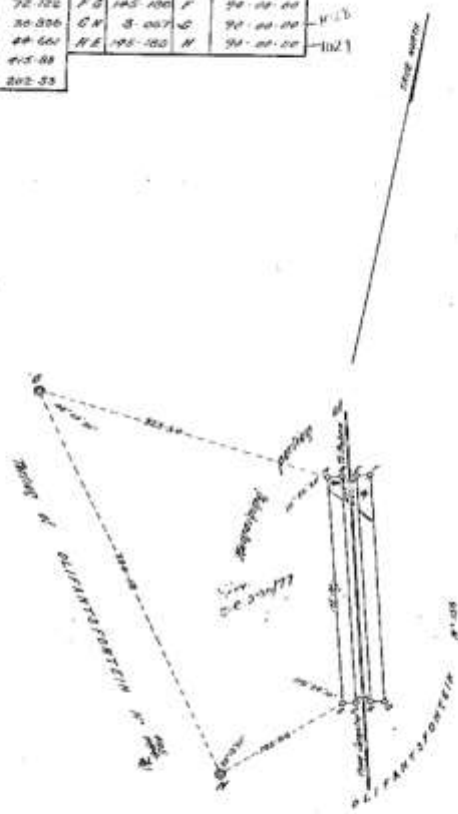
During the Anglo-Boer War (1899-1902) there was a skirmish between Boer and British forces near Olifantsfontein, while there was also a Black Concentration Camp built by the British near Olifantsfontein station/railway (Bergh 1999: 51; 55). Olifantsfontein station (around which a small town/residential area would have developed) is shown on Jeppe's 1899 Map already (Bergh 1999: 148). Pelser recorded the location of the possible Black Concentration Camp cemetery on Olifantsfontein during a 2018 HIA assessment, but this site is located far from the Clayville Truck Yard development area (Pelser 2018: 16-23).

The oldest map for the original farm Olifantsfontein that could be located in the Chief Surveyor General's database ([www.csg.dla.gov.za](http://www.csg.dla.gov.za)) dates to 1905 and indicates that Olifantsfontein (the portion on the map) was surveyed in 1904 (**CSG Document 10H2NH01**).

CO-ORDINATES		SIDES		ANGLES	
A	+ 108-607	A B	0-067	A	90°-00'-00
B	+ 105-650	B C	145-180	B	90-00-00
C	+ 58-177	C D	8-007	C	90-00-00
D	+ 37-158	D A	145-180	D	90-00-00
E	+ 107-370	E F	8-007	E	90-00-00
F	+ 109-337	F G	145-180	F	90-00-00
G	+ 37-270	G H	8-007	G	90-00-00
H	+ 35-257	H E	145-180	H	90-00-00
I	+ 109-04				
J	+ 171-97				

No. 775, Enquest. The numerical data of this Diagram are sufficiently exact, correct.  
*[Signature]*  
 Surveyor-General  
 Surveyor-General's Office  
 Pretoria, 1914.106

This Diagram belongs to the Deed of Transfer No. issued this day is correct of  
 Deeds Office, Pretoria.  
 Registrar of Deeds



For See the Defects and Endorsements See Over.

Trans registered on 21/02/1915  
 Now registered under:  
 No. 202  
 REGISTRAR ATODELING JR  
 REGISTRATION DIVISION JR

*[Faint text describing the survey details and legal context]*  
 The above Diagram, referred to in the Enquest of the 1st August 1914, contains 3 Hectares 5/12 Square Rods of Land, being *[faint text]* of the Farm **OLIFANTSFONTEIN N° 156** being *[faint text]* and reserved to the Railway Administration as such and is hereby registered as such and the proceeds were applied to the same purpose. The Farm was conveyed by Deed of Transfer No. 1249 dated 21st February 1905 transferred to the consolidated Brick Factory & Lime Co. Ld. by Deed of Transfer No. 1249 dated 21st February 1905. Situated in the District of *[faint text]* Ward *[faint text]* Transvaal Colony. Bounded as indicated above. The Reasons were pointed out by *[faint text]* and have been erected according to law.  
 Surveyed in *[faint text]* by me  
*[Signature]*  
 Government Land Surveyor.

T.P.S. (Halfpenny on Clayville)

JESV-1364, 3560

Figure 7: 1905 Map of a section of the farm Olifantsfontein ([www.csg.dla.gov.za](http://www.csg.dla.gov.za)).

Based on the aerial images and heritage desktop study it is therefore deemed unlikely that any significant sites, features or material of cultural heritage (archaeological and/or historical) origin might exist in the study area. Recent historical activities (agricultural and later urban/industrial) would have impacted on any if they did exist here in the past and would have disturbed or destroyed these to a large degree. However,

known archaeological and historical sites, features and material have been identified in the larger geographical area and this needs to be taken into consideration during any future actions related to the proposed development.

**It is therefore recommended that Exemption from a Full Phase 1 Heritage Impact Assessment (HIA) for the proposed Clayville Truckyard on Portions 55 & 56 of Erf 1015 in Clayville Extension 11, Ekurhuleni Metropolitan Municipality, Gauteng be granted to the applicants taking into consideration the following:**

**The subterranean nature of cultural heritage (archaeological and/or historical) resources must always be kept in mind. Should any previously unknown or invisible sites, features or material be uncovered during any development actions then an expert should be contacted to investigate and provide recommendations on the way forward. This could include previously unknown and unmarked graves.**

Should there be any questions or comments on the contents of this document please contact the author as soon as possible.

Kind regards

A handwritten signature in black ink, appearing to read 'A. Pels', is positioned above the printed name.

Anton Pelser

## References

1. General & Closer Views of Study Area location and footprint: Google Earth 2020.
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5. Pelsler, A.J. 2013. A Report on a Phase 1 HIA for the Clayville Extension 53 Township Development located on a Portion of the farm Olifantsfontein 402JR, Gauteng Province. Unpublished Report APAC013/37. APelsler Archaeological Consulting cc. For: Seaton Thomson & Associates. May 2013.
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6. Republic of South Africa. 1999. National Heritage Resources Act (No 25 of 1999). Pretoria: the Government Printer.
7. Republic of South Africa. 1998. National Environmental Management Act (no 107 of 1998). Pretoria: The Government Printer.
8. Chief Surveyor General Database: [www.csg.dla.gov.za](http://www.csg.dla.gov.za). CSG Document 10H2NH01.