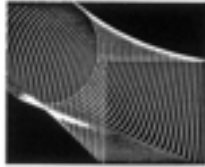


CULTMATRIX



CULTMATRIX

PTY (LTD)

PO Box 12013 Queenswood 0121 Pretoria South Africa
Fax +27 (086) 612-7383 Mobile +27 (0)82 577-4741 E-Mail: njc.arch@gmail.com

PROJECT 13_14

**HERITAGE IMPACT ASSESSMENT REPORT: MULTIPURPOSE COMMERCIAL
DEVELOPMENT. LOFTUS PARK, PRETORIA
ERF 414/418 1552 and PORTION 397, ARCADIA, PRETORIA
SUBMITTED UNDER SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT
(ACT 25 OF 1999)**

PHRA_G Ref: H111/13



**COMPILED BY
NJ CLARKE**

**PREPARED FOR
ABLAND (Pty) Ltd
DATE: 08 December 2014**

TABLE OF CONTENTS

EXECUTIVE SUMMARY..... 6

1. REPORT CONTEXT 11

1.1 GENERAL NOTES 11

1.2 PURPOSE OF THE FINAL REPORT..... 12

1.3 HISTORY OF THE REPORT..... 12

1.4 LEGAL CONTEXT OF THE REPORT..... 13

1.5 RECENT CHANGES TO THE TRANSPORT LANDSCAPE OF THE AREA..... 13

1.6 DEVELOPMENT CRITERIA IN TERMS OF SECTION 38 OF THE NHRA 14

1.7 PROPERTY DETAILS 14

1.8 PROPERTY OWNERSHIP 15

1.9 DEVELOPER 15

1.10 ARCHITECTS 15

1.11 HERITAGE ASSESSMENT PRACTITIONER 15

2. DEVELOPMENT CONTEXT 16

2.1 DEVELOPMENT SITE/AREA LOCATION AND BOUNDARIES..... 16

2.2 ENVIRONMENTAL FEATURES..... 18

2.3 BUILT ENVIRONMENT FEATURES 18

2.3.1 *Development site – Erf 414/418, 1552 and Portion 397, Arcadia.* 19

2.3.2 *Site history*..... 19

2.3.3 *Club House (Refer to label ‘1’ on figure 7)* 22

2.3.4 *Original location of the statue ‘Spirit of Sport’ (Refer to label ‘2’ on figure 7)*..... 22

2.3.5 *Entrance Gate, corner of Park and Kirkness Street (Refer to ‘3’ on Figure 7.)* 25

2.3.6 *Granite Kerb stones* 26

2.3.7 *Platforms of earlier playing fields* 27

2.4 PROXIMATE HERITAGE RESOURCES 28

2.4.1 *Pine Avenue (Refer to label ‘4’ on Figures 16 and 17)*..... 29

2.4.2 *Arcadia (Township)* 30

2.4.3 *Loftus Versfeld Stadium (Refer to label ‘6’ on Figures 16 and 17)*..... 32

2.4.4 *Clydesdale (Refer to label ‘7’ on Figures 16 and 17)* 33

2.2.5 *Pretoria High School for Girls*..... 34

2.2.5 *Loftus Substation (Refer to label ‘5(a)’ on Figures 16 and 17)*..... 37

2.5 PROXIMATE HERITAGE RESOURCES – WIDER ENVIRONMENT 39

2.6 DEVELOPMENT DESCRIPTION (SEE APPENDIX E)..... 43

2.6.1 *Roads Upgrade* 47

2.6.3 *Development Strategy*..... 49

3. HERITAGE IMPACT CONTEXT 50

3.1 CULTURAL LANDSCAPE EVIDENCE..... 50

3.2 HERITAGE CONTEXT CLASSIFICATION 51

3.3 DEVELOPMENT CONTEXT TYPE 51

3.4 EXPECTED IMPACT SIGNIFICANCE 52

4. HERITAGE IMPACT ASSESSMENT 53

4.1 APPROACH..... 53

4.1.1 *Definitions and assumptions* 53

4.1.2 *Limiting/Restricting factors* 53

4.1.3 *Field work*..... 54

4.1.4 *Desktop study*..... 54

4.2 GENERAL ISSUES OF SITE AND CONTEXT 54

4.3 SIGNIFICANCE ASSESSMENT OF PHYSICALLY IMPACTED AREAS 56

4.4 DESCRIPTION AND ASSESSMENT OF HERITAGE IMPACTS..... 57

4.4.1 *Direct Impacts - On-Site resources.* 57

4.4.2 *Indirect Impacts - proximate resources* 60

4.4.3 *Summarised identification of heritage features, impacts and impact management measures.* 64

4.5 ALTERNATIVES 65

4.6 SOCIAL AND ECONOMIC BENEFITS..... 65

4.7 CONSULTATION WITH AFFECTED COMMUNITIES..... 65

CULTMATRIX

4.8 IDENTIFICATION OF RISK SOURCES.....	66
4.9 KEY MITIGATION AND ENHANCEMENT MEASURES BEFORE AND DURING CONSTRUCTION.....	66
4.10 CONSIDERATION OF ALTERNATIVES	66
4.11 SUMMARISED FINDINGS AND RECOMMENDATIONS	66
APPENDIX A: RESPONSE TO THE 2013 NID	1
APPENDIX B: RECORD OF PUBLIC PARTICIPATION PROCESS.....	2
APPENDIX C: REGISTER OF INTERESTED AND AFFECTED PARTIES.....	5
APPENDIX D: AGREEMENT BETWEEN THE CLYDESDALE VILLAGE ASSOCIATION AND ABLAND (PTY) LTD.	7
APPENDIX D: GLOSSARY OF TERMS.....	10

LIST OF FIGURES

FIGURE 1. CHANGING PUBLIC TRANSPORT SYSTEMS IN RELATION TO THE DEVELOPMENT SITE. (STUDIO 3 INTERNATIONAL ARCHITECTS) 14

FIGURE 2 LOCATION OF ERF 414/418, 1552 AND PORTION 397, ARCADIA. 16

FIGURE 3 GOOGLE EARTH IMAGE (2014) ILLUSTRATING THE STUDY AREA(APPROXIMATE SITE BOUNDARIES) IN ITS WIDER CONTEXT. (ADAPTED FROM GOOGLE EARTH, 2014) 17

FIGURE 4 CLOSE UP OF THE STUDY AREA. EXACT SITE BOUNDARIES ARE INDICATED. (FROM THE CITY OF TSHWANE GIS DATABASE, WWW.TSHWANE.GOV.ZA, 2014) 17

FIGURE 5. THE ORIGINAL SPATIAL INTENT OF THE PINE AVENUE IS INDICATED WITH A BLUE ARROW. NOTICE TO WHAT EXTENT THIS HAS BEEN DISRUPTED IN TIME..... 18

FIGURE 6 1947 AERIAL PHOTOGRAPH OF THE SOUTH-EAST OF PRETORIA, THE SITE IS ROUGHLY INDICATED..... 20

FIGURE 7 ENLARGEMENT OF THE 1947 AERIAL PHOTOGRAPH WITH THE DEVELOPMENT SITE INDICATED..... 21

FIGURE 8 ENLARGEMENT OF THE 1947 AERIAL PHOTOGRAPH WITH IDENTIFIED BUILT HERITAGE RESOURCES ON SITE IDENTIFIED. 21

FIGURE 9 THE EASTERN FAÇADE OF THE CLUB HOUSE (F COETZEE, 2012) 22

FIGURE 10 THE WESTERN FAÇADE OF THE CLUB HOUSE (F COETZEE, 2012) 22

FIGURE 11 *THE DISCUS THROWER IN ITS ORIGINAL LOCATION ON THE LOFTUS PARK NORTHERN SPORTS FIELDS IN C. 1975 (OUR ART VOL II)* 23

FIGURE 12. AN EARLIER UNDATED PHOTOGRAPH OF THE 'SPIRIT OF SPORT' ON A DIFFERENT PLINTH. WHY THIS WAS ALTERED OVER TIME IS UNKNOWN. (APPENDIX B)..... 24

FIGURE 13 THE SANDSTONE COLUMN ON THE PLACE WHERE THE 'SPIRIT OF SPORT' ONCE STOOD. (F COETZEE, 2012) 25

FIGURE 14 CLOSE VIEW OF SANDSTONE COLUMN WHERE THE 'SPIRIT OF SPORT' STOOD. (F COETZEE, 2012) 25

FIGURE 15 THE ENTRANCE GATE ON THE CORNER OF PARK AND KIRKNESS STREETS. (F COETSZEE, 2012) 26

FIGURE 16 GRANITE KERBS OCCUR THROUGHOUT THE SITE. 26

FIGURE 17 CURRENT STATE OF THE PLAYING FIELDS. THE OUTLINE OF THE SPATIAL STRUCTURE CAN BE DISCERNED, PARTLY DUE TO STILL EXTANT RETAINING WALLS. (GOOGLE EARTH) 27

FIGURE 18. ADAPTED 1947 AERIAL PHOTOGRAPH. NOTE. SOME OF THE RESOURCES WERE NOT EXTANT WHEN THIS PHOTOGRAPH WAS TAKEN. 28

FIGURE 19 ADAPTED 1947 AERIAL PHOTOGRAPH. NOTE. SOME OF THE RESOURCES WERE NOT EXTANT WHEN THIS PHOTOGRAPH WAS TAKEN. 29

FIGURE 20. THE EXTENT OF THE TOWNSHIP OF ARCADIA, ALTHOUGH BLACKMOOR, EASTWOOD, EASTCLIFF AND LISDOGAN PARK ARE OFTEN INCLUDED. 30

FIGURE 21 KINGSTON HOUSE, LOCATED ON THE CORNER OF KIRKNESS AND PARK STREETS. 31

FIGURE 22 NETBALL SA HOUSE. 32

FIGURE 23 A PHOTOGRAPH DATING TO PRE-2009 (WIKIPEDIA.ORG) ON WHICH THE EASTERN SEATING IS VISIBLE (DATING TO 1922/3) 33

FIGURE 24. THE EXTENT OF THE OF CLYDESDALE AS DEFINED BY THE CLYDESDALE VILLAGE ASSOCIATION (ADAPTED FROM GOOGLE MAPS)..... 34

FIGURE 25 THE MAIN BUILDING OF THE PRETORIA HIGH SCHOOL FOR GIRLS..... 35

FIGURE 26 THE GIRLS HIGH GROUNDS IN 1947 36

FIGURE 27 THE GIRLS HIGH GROUNDS IN 2014. STRUCTURES OLDER THAN 60 YEARS ARE INDICATED. 36

FIGURE 28 THE LOFTUS SUBSTATION (FP COETZEE, 2012) 38

FIGURE 20. AERIAL PHOTO INDICATING POSITIONS OF WIDER CONTEXT HERITAGE COMPLEXES. (ADAPTED FROM GOOGLE)..... 39

FIGURE 29. THE MAIN BUILDING OF THE AFRIKAANS HOËR SEUNSSKOOL PRETORIA..... 40

FIGURE 30. THE MAIN BUILDING OF THE AFRIKAANS HOËR MEISIËSSKOOL PRETORIA..... 40

FIGURE 31. THE UP OLD ARTS BUILDING..... 40

FIGURE 32. BOYS HIGH MAIN BLOCK..... 41

FIGURE 33. NG CHURCH PRETORIA EAST, THE 'OOSKERK'..... 41

FIGURE 34. AXES ANALYSIS OF THE INSTITUTIONAL CONTEXT OF THE LOFTUS PRECINCT. 42

FIGURE 35. AXES ANALYSIS OF THE WIDER PRETORIA EAST CONTEXT INCLUDING THE UNION BUILDINGS AND CHURCH SQUARE. . 42

FIGURE 36. BIRDS EYE VIEW OF THE PROPOSED DEVELOPMENT IN ITS CONTEXT. NOTE: THE TRAFFIC CIRCLE INDICATED HAS SINCE BEEN REMOVED FROM THE PLANNING. (STUDIO 3 INTERNATIONAL ARCHITECTS)..... 43

FIGURE 37. SITE PLAN FOR THE LOFTUS PARK DEVELOPMENT. (ADAPTED FROM DANIE REBEL LANDSCAPE ARCHITECTS) 44

FIGURE 38. AREA TABLE FOR THE LOFTUS DEVELOPMENT (STUDIO 3 INTERNATIONAL ARCHITECTS) 45

FIGURE 39 PRINCIPLES ADHERED TO IN THE DEVELOPMENT OF A PROPOSAL FOR THE SITE, INCLUDING, AN INCREASE IN BULK AND SCALE FROM THE NORTH-WEST TO THE SOUTH-EAST, RETENTION OF THE OLD CLUB HOUSE, RETENTION OF THE TRANSFORMER BUILDING AND THE SETBACK OF THE DEVELOPMENT FROM KIRKNESS STREET TO MINIMIZE THE IMPACT OF THE SCALE OF THE NEW DEVELOPMENT ON THE STREET AND PROVIDE FOR A TRANSITION OF SCALE BETWEEN THE LOW-RISE CLYDESDALE NEIGHBOURHOOD AND THE DEVELOPMENT. 46

CULTMATRIX

FIGURE 40 KIRKNESS STREET IN THE VICINITY OF THE STREET WIDENING (LOOKING NORTH)..... 47

FIGURE 41. PROPOSED ROADS UPGRADE FOR THE LOFTUS PARK PROJECT. AREAS IN GREY INDICATE ROAD WIDENING OF EXISTING PUBLIC ROADS. 48

FIGURE 42, THE c,1920 CLUB HOUSE. 57

FIGURE 43. THE SANDSTONE COLUMN AND CIRCLE WHERE THE 'SPIRIT OF SPORT' USED TO STAND. 58

FIGURE 44 THE POSTS OF THE GATES TO THE SPORTS FIELDS ON PARK STREET, JUST OFF THE CORNER OF KIRKNESS STREET..... 58

FIGURE 45. VEHICULAR PATHWAY, AN EXTENATION OF EASTWOOD STREET, WITH GRANITE KERBS. 59

FIGURE 46 AERIAL PHOTOGRAPH (GOOGLE) OF THE DEVELOPMENT SITE ON WHICH THE STRUCTURE OF THE FORMER SPORTS FIELDS CAN STILL BE TRACED. 60

EXECUTIVE SUMMARY

This report contains a Heritage Impact Assessment (HIA) in accordance with the provisions of Section 38(8) of the National Heritage Resources Act (25/1999) (NHRA), submitted to the Provincial Heritage Resources Authority - Gauteng. This HIA forms part of the process of obtaining the necessary comments and recommendations from the Provincial Heritage Resources Agency - Gauteng (PHRA-G). This is a stand-alone HIA and does not form part of the process under National Environmental Management Act (1540/1998) (NEMA) for statutory approvals of rights in terms of heritage, environmental, town planning and other legislation.

The proposed development is located on Erf 414/418, 1552 and Portion 397, Arcadia, located in the City of Tshwane Metropolitan Municipality.

The development site is urban, surrounded by buildings serving recreational (sports), educational, commercial and residential functions and parkland. The site is associated with Loftus Versfeld sports stadium.

The site has seen constant redevelopment since it was as first used as sports fields in c.1906 but has been abandoned as a sports fields since 1995. The Club House building was until recently in use as bar/restaurant, but the alterations that had been affected to it in the process were not approved.

The aim of an HIA is to ensure that the needs of socio-economic development and the rights of the owner of the property to exercise its development privileges are balanced by the needs to preserve significant heritage resources. .

The purpose of this HIA report is to enable the relevant heritage authority to evaluate the proposed development as required in terms of Section 38 of the NHRA.

The objectives of this report are:

- To identify and map heritage resources that will be affected
- To assess the cultural significance of these heritage resources
- To assess the impact of the development on these heritage resources
- To assess the benefits of conserving these heritage resources in relationship to the socio-economic benefits of the development
- To provide the public with an opportunity to comment on the heritage aspects of the proposed development
- To record the process of engagement with Interested and Affected Parties
- To consider alternatives should heritage resources be affected in a negative manner
- To determine methods to mitigate negative impacts before, during and after construction activities

The intended development has provided the following Section 38 HIA triggers:

- 38.(1.c.1) Exceeding 5 000 m² in extent
- 38 (1.d) the re-zoning of a site exceeding 10 000 m² in extent;

The investigation was conducted as follows:

Desktop study, including identification of archaeological reports for other projects, completed heritage impact assessment reports, historic maps, cadastral diagrams and general publications about the site. This HIA was preceded by Cultural Heritage Surveys conducted by Francois P Coetzee, appended to this HIA as stand-alone documents, but also submitted to the PHRA-G with the Notification of Intent to Develop in 2013 Site visits.

Project team meetings with the owner/developer and the project team. Participant meetings with I&AP's

Heritage impacts are categorized as:

Neutral (no impact)

CULTMATRIX

Direct or physical impacts, implying alteration or destruction of heritage features within the project boundaries
 Indirect impacts, e.g. restriction of access or visual intrusion concerning the broader environment
 Cumulative impacts that are combinations of the above

- The predicted heritage impacts by the proposed development are various, including direct negative, positive and indirect. These are however well balanced by the positive impact of the development in the immediate and wider context.

Heritage impacts can be managed through one or a combination of the following measures:

Mitigation (minimising impacts through further documentation and research before a place is altered or destroyed)
 Avoidance
 Compensation (balancing of making good the loss of one heritage feature by the preservation of another one)
 Enhancement (positive impacts on heritage features)
 Rehabilitation (re-use of preserved heritage features)
 Interpretation (providing information on heritage features)
 Memorialization (retaining the memory of heritage features that have been lost)
 No action
 Relocation (historic equipment, graves)
 Alternatives

- Of the above measures, mitigation (documentation and monitoring), compensation, interpretation, memorialization and relocation apply in the case of this project, depending on the type of heritage feature that may be affected.

This report complies as follows with the provisions of Section 38 (3) of the National Heritage Resources Act (Act 25 of 1999):

- (a) Identification and mapping of heritage resources
- (b) Cultural significance
- (c) Predicted impacts
- (d) Benefit-loss assessment
- (e) Consultation with interested and affected parties
- (f) Mitigation before construction
- (g) Plans for mitigation of any adverse effects during and after the completion of the proposed development.

See below summarizing table.

TABLE 1: Identification of heritage features, impacts and impact management measures

S 3(2) NHRA heritage resource	(a) Identification	(b) Significance	(c) Impact	(f) Recommended impact management
	Site			
Buildings, structures, places and equipment of cultural significance	The Club House	High local	Medium Positive	<ul style="list-style-type: none"> • A thorough structural analysis must be carried out to assess the impact of the rising water table and other issues on the structural stability of the Club House form which a conservation strategy must be developed to retain the heritage value of the structure. This in turn is to be communicated to the PHRA_G. •The restoration/adaptive re-use must be carried out under the guidance of a heritage architect with experience in both restoration and adaptive reuse. •A conservation policy, based on Burra Charter guidelines, will need to be composed BEFORE the design of the intervention is stated to inform the design process. •A contractor with experience in conservation measures should by preference be employed on the conservation of this building. •A continuous photo-documentation of the conservation process should be kept and lodged

CULTMATRIX

				with both the PHRA-G and the Department of Architecture at the University of Pretoria
	The Sandstone Column	Medium local	Medium negative	<ul style="list-style-type: none"> •The sandstone column and plaque should find a new home on the site, as part of the larger site interpretation. •The history of the statue, including visual material which is non-existent on site now, should be presented on site in the form of an interpretative display, possibly linked to the history of the larger site.
	The Original Gate Posts	Medium local	Medium negative	The relocation of the gates should be planned as part of the wider interpretation of the site and included in such an interpretation
	Granite kerbs	Low local	Medium negative	<ul style="list-style-type: none"> •Reuse of the kerb elements are proposed in the landscape design. This can include: •Reuse as kerbs (also completing kerb-edges where there are elements missing currently) •Placing the kerbs up-right as bollards •Creative use as sculptural elements
	Remnant footprints of playing fields	Low local	Medium negative	• Document. Include as part of the on-site commemoration of the history of the site and precinct.
Areas to which oral traditions are attached or which are associated with intangible heritage	Entire precinct	Medium regional	Positive	On-site interpretation centre planned (exhibition centre) and street level interpretative narrative landscape that will present the history of the site.
Areas of significance related to labour history	None	-	-	-
Historical settlements and townscapes	Whole site (as part of a larger context)	High local	Positive	Development will contribute to security and vitality of the neighbourhood. Developer to commission a Development Framework for Clydesdale. Development will contribute to the urban street scape and the presentation of the cultural and historical nature of its context.
Landscapes and natural features of cultural significance	Various spatial axes, including the Pine Avenue adjacent to the site	High local	Visual	Pine avenue: Development stands adjacent to the Pine Avenue. No physical impact.
Geological sites of scientific or cultural importance	None	-	-	-
Archaeological artefacts	None	-	-	-
Movable objects	None	-	-	-

Alternatives

The process of developing a proposal for the site has been informed by heritage aspects from the beginning, and was initiated by the commissioning of a Scoping Report for the site. No alternatives have been taken into consideration as the development has already responded to issues.

Social and economic benefits

The proposed development will have direct socio-economic and urban benefits.

Economic

- During the construction phase the development will:
 - Provide jobs in the construction and allied industries.
- The development will result in a large investment (estimated at Rbn1,3) in the area which will in turn:
 - Provides positive impetus in an economically at-risk area
 - Increase market value of property in the vicinity

CULTMATRIX

- Contribute to the appeal of neighbouring residential areas, thereby contributing to their longer term resilience,
- Contribute to the appeal of the educational institutions that surround it.

Social

- The development will contribute to the creation of a social hub in relating to sport and fitness at the Loftus Stadium precinct, supporting current social functions.
- Through the establishment of a Forum the development will contribute to communication and control of the precinct.
- The development will contribute to safety and security in the precinct through the active engagement of the developer as well as by the Forum.
- The development will provide for a public social meeting space for the precinct, a public function that is lacking in the vicinity.
- The development will provide a regular income for the Blue Bulls Rugby Union which in turn undertakes Youth Sport development in the northern provinces of South Africa.

Cultural

Retention of historic fabric

- The development will include the conservation of the in-danger Club House (Sinbin) building.
- Fabric such as granite kerbs and the posts of the old entrance gates will be re-used and their relocation absorbed in the on-site narratives.
- Historic trees: Jacaranda's, will be relocated and not removed.

Commemoration and interpretation:

- The development will contribute to the memorialising of the history of the Eastern Sports Fields and the history of sports on the site through the inclusion of an Exhibition Centre presenting these histories on site.
- Additionally the larger landscape development will include a narrative landscape which will connect the site to the larger institutional landscape, incorporating elements that relate to the schools and University, as well as Clydesdale in the precinct.

Related to the conservation of the larger cultural landscape:

- The development will bring about the compilation of a Development Framework for the Clydesdale area which will contribute in a large way to the retention of the important qualities of that neighbourhood. The completion of a heritage register for the area is a part of this process.

Consultation with affected communities

This consultation process has been on-going since 2012 and is still in process. A final Public Participation Report will be lodged as stand-alone appendix to this HIA after comment on this HIA has been received from I&AP's registered for the process.

Identification of risk sources

The following project actions will not likely impact negatively on any potential paleontological and archaeological sites and remains as the site has been developed for over 100 years:

- Bulk earthworks and excavations may expose or uncover objects and artefacts and unmarked human burials.

Key mitigation and enhancement measures before and during construction

Club House

- The structural stability of the Club House should be assessed before renovation is undertaken. Guidelines following from this structural analysis will be used as informant in the conservation process which is to be communicated to the PHRA-G once the appropriate procedure has been developed.
- The detail planning of the internal reconfiguration of the Club House should be developed according to the mitigation measures outlined.

Consideration of alternatives

No alternatives have been considered.

Summarised findings and recommendations

The proposed development is located in a historic urban landscape classified primarily as (modern) built environment landscape. This type of landscape is of relatively high heritage sensitivity because of the potential density of heritage resources and the relationships of places and spaces to each other. Additionally the development is located within an institutional precinct, which serves the wider city context.

The project team has taken cognisance of this in the development of a project proposal, and attempted to balance the benefits of development against the potential negative impacts. This includes the willingness of the developer to:

1. Conserve the Club House
2. Relocate heritage fabric where this is feasible
3. Invest in the area through direct physical investment and through the creation of planning and decision-making mechanisms that will contribute to heritage conservation.

The only heritage resources located on the development area that will be directly affected are the:

- Clubhouse
- Sandstone Column and circle where the Spirit of Sport used to be located
- Gate Posts of the entrance gate to the Loftus precinct.
- Granite kerb stones
- Remaining footprints of the sports fields of the Northern Sports fields, which have not been in use since 1995.

Those resources that will be affected are located outside the boundaries of the development, these are:

- The larger cultural urban landscape. Densification might occur. This requires mitigation which has already been provided for through the public participation process and the signing of an Agreement between the CVA, ABLAND and the Blue Bulls Rugby Union (BBRU).
- Kirkness and Park Streets where limited street widening will occur. This is offset by the beautification project that is to be undertaken by the developer.

From an archaeological perspective no finds or artefacts of significance were identified or are expected seeing as the site has undergone extensive development in the past..

The nature and significance of those heritage resources identified has led to the conclusion that a medium impact is expected but that the planned activity (extension of an existing building) is of such positive impact that it offsets the medium negative impacts.

Cultmatrix recommends that the proposed actions may proceed as the activity has positive benefits which outweigh the negative impacts in heritage and economic terms, and carries low risk, provided that the following mitigation measures are considered:

1. The recommendation above is conditional to the execution of the content of the Agreement between ABLAND and the Clydesdale Village Association.
2. The recommendation above is conditional to the execution of the mitigatory measures proposed.
3. The Club House be carefully analysed by a structural engineer who should recommend the required steps to be taken to conserve the heritage value of the structure.
4. The Entrance gate, and granite kerbs be repositioned.
5. The sandstone column be photo-recorded and the history of the Spirit of Sport statue be presented in a public place on site.
6. Should any other human remains be disturbed, exposed or uncovered during excavations for the proposed project (unlikely), these should immediately be reported to Cultmatrix. Burial remains should not be disturbed or removed until inspected by an archaeologist.
7. Site preparation activities must be monitored for the occurrence of any other archaeological material (Stone Age tools, Iron Age artefacts, historic waste disposal sites etc.) and similar hidden/buried chance finds and an archaeologist should be asked to inspect the area when this has reached an advanced stage in order to verify the presence or absence of any such material.



NJ CLARKE

Date: 08 December 2014

1. REPORT CONTEXT

1.1 General notes

1. The structure of this report is based on:
 - SOUTH AFRICAN HERITAGE RESOURCES AGENCY, Heritage Impact Assessment: Notification of intent to develop (form)
 - DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING, PROVINCIAL GOVERNMENT OF THE WESTERN CAPE, 2005, Guideline for involving heritage specialists in EIA processes (document)
 - DEPARTMENT OF ENVIRONMENT AFFAIRS AND TOURISM, Integrated Environmental Management Guidelines
 - SOUTH AFRICAN HERITAGE RESOURCES AGENCY, 2006, *Minimum standards: Archaeological and palaeontological components of impact assessment reports* (unpublished).
 - PROVINCIAL HERITAGE RESOURCES AUTHORITY GAUTENG, 2010, *Report requirements for HIA reports* (unpublished).
 - WORLD BANK, *Environmental Assessment Sourcebook Update No 8, September 1994: Cultural Heritage in Environmental Assessment*.
 - Best-practice HIA reports submitted by Cultmatrix and other heritage consultants.
3. This report is informed by the *National Heritage Resources Act (25/1999)* (NHRA) and is consistent with the various ICOMOS charters for places of cultural significance.
4. Definitions of terms, unless otherwise so mentioned, are to be read as consisted with the 2013 edition of the Australia ICOMOS Burra Charter.
5. Recommendations contained in this application do not exempt the applicant from complying with any national, provincial and municipal legislation or other regulatory requirements, including any protection or management or general provision in terms of the NHRA.
6. Rights and responsibilities that arise from this report are those of the applicant and not that of Cultmatrix (Pty) Ltd. Cultmatrix (Pty) Ltd. assumes no responsibility for compliance with conditions that may be required by the PHRA-G in terms of this report.
7. Where, in this report the name Cultmatrix occurs, Cultmatrix (Pty) Ltd. is meant.
8. Cultmatrix (Pty) Ltd. assumes no responsibility whatsoever for any loss or damages that may be suffered as a direct or indirect result of information contained in this application. Any claim that may however arise is limited to the amount paid to Cultmatrix for services rendered to compile this report.
9. Although all possible care is taken to identify all sites of cultural importance during the survey of study areas, the nature of archaeological and historical sites are as such that it always is possible that hidden or subterranean sites could be overlooked during the study. Cultmatrix and its subcontractors will not be held liable for such oversights or for costs incurred as a result thereof.
10. Acronyms and abbreviations used:
 - a. NHRA – The National Heritage Resources Act (Act 25 of 1999)
 - b. PHRA_G – Provincial Heritage Resources Authority – Gauteng
 - c. SAHRA – South African Heritage Resources Agency
 - d. CTMM: City of Tshwane Metropolitan Municipality

CULTMATRIX

- e. NID – Notification of Intent to Develop (As per Section 38 (1) of the NHRA
- f. PPP – Public Participation Process
- g. I&AP’s – Interested and Affected Parties

1.2 Purpose of the final report

TABLE 2: Applicable category of heritage impact assessment study and report

Report category	Aim	Office submitted to	Requested response
Screening	The aim of the screening investigation is to provide an informed heritage-related opinion about the proposed development by an appropriate heritage specialist. The objectives of this investigation are to screen potential heritage issues through a site inspection, to develop a broad understanding of heritage policy-related context, to review any existing data on the history and heritage significance of the site, to check if the site has any formal heritage status, to discuss the proposed development with heritage contacts and to scan the development proposals. The result of this investigation is a brief statement indicating potential heritage impacts/issues.		
Scoping (basic assessment)	The aim of the scoping investigation is to analyse heritage issues and how to manage them within the context of the proposed development. The objectives are to assess heritage significance (involving site inspections and basic desktop and archival research); to identify the need for further detailed inputs by heritage specialists, to consult with local heritage groups and experts, to review the general compatibility of the development proposals with heritage policy and to assess the acceptability of the proposed development from a heritage perspective. The result of this investigation is a heritage scoping report indicating the presence/absence of heritage resources and how to manage them in the context of the proposed development.		
Full HIA	The aim of the full HIA investigation is to analyse and recommend heritage management mitigation measures and monitoring programmes. The objectives are to analyse heritage issues, to research the chronology of the site and its role in the broader context, to undertake a comprehensive assessment of heritage significance, to analyse the nature and scale of the proposed development, to consult with local heritage groups and experts as part of the broader EIA stakeholder engagement process, to establish the compatibility of the proposed development with heritage and other statutory frameworks and to assess alternatives in order to promote heritage conservation issues.	PHRA-G	Comment and recommendation under Section 38 of the NHRA

1.3 History of the report

The consultants, Cultmatrix (Pty) Ltd, were approached by Abland (Pty) Ltd. to consult on the proposed redevelopment of Loftus Park Northern Sports fields, a site proximate to the Loftus Versfeld Stadium which led to the commissioning of a Heritage Impact Assessment (HIA).

This report was preceded by a Notification of Intent to Develop, submitted to the PHRA-G and listed on the SAHRIS digital platform. The NID was heard on 18 October and feedback received on 08 November 2013. Their response (Appendix A) requested the submission of a full HIA.

The requirements set by the PHRA-G were (here quoted)

- *Although a heritage report was included, the Committee still needs an impact study showing how the two buildings will be impacted as well as the other heritage resources mentioned in the report.*
- *The study must be done by and Architect with an experience of dealing with heritage buildings*
- *A Site Development Plan (SDP) must also be submitted.*

CULTMATRIX

- *Submit the Public participation report or proof after the 30 day (public comments) period calling for comments from the interested and affected parties. An advertisement must be put in the local newspaper which must also include our details: tebogo.mookomme@gauteng.gov.za. Tel: 011 355 2545.*

This HIA responds to the above requirements as set by the PHRA-G HIA committee as well as the other statutory requirements set by Section 38 of the National Heritage Resources Act. (25 of 1999)

1.4 Legal context of the report

ACT	COMPONENT	IMPLICATION	RELEVANCE	COMPLIANCE
NHRA	S 34	Impacts on buildings and structures older than 60 years	Relevant to the Old Club House (Sinbin Building)	- Impact forms part of HIA process
	S 35	Impacts on archaeological heritage resources	Possible hidden (buried) features	- Monitor during construction work
	S 36	Impacts on graves	None	-
	S 37	Impacts on public monuments	One public monument to be relocated	- Impact forms part of HIA process
	S 38	Developments requiring an HIA	Development is listed activity	- HIA
NEMA	EIA Regulations	Activities requiring an EIA	Development is not subject to an EIA	- HIA for Erf 414/418 1552 and Portion 397 is stand-alone
Other	-	-	-	-

1.5 Recent changes to the transport landscape of the area.

1.5.1 The Gautrain

The current Pretoria Gautrain terminal is located at Hatfield. The Gautrain bus passes directly to the north of the site down Park Street.

1.5.1 The City of Tshwane Rapid Transit System

The system, currently under construction, has a number of routes, of which the eastern bound branch passes to the north of the site along Jorrisson Street. (See Figure 1)

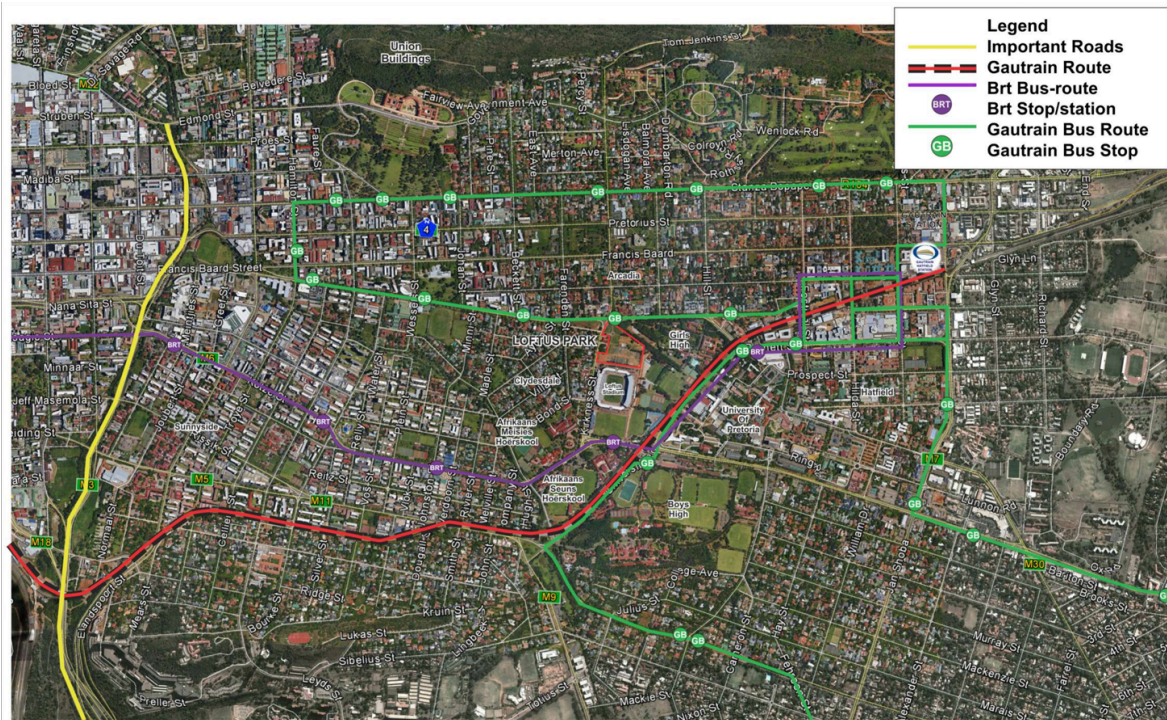


Figure 1. Changing public transport systems in relation to the development site. (Studio 3 International Architects)

1.6 Development criteria in terms of Section 38 of the NHRA

1.6	Development criteria in terms of Section 38(1)	Yes/No details
1.6.1	Construction of road, wall, power line, pipeline, canal or other linear form of development or barrier exceeding 300m in length	Yes - new roads and reconfiguration of extant streets.
1.6.2	Construction of bridge or similar structure exceeding 50m in length	No
1.6.3	Development exceeding 5000m ²	Yes. Site area of 32 300,5m ²
1.6.4	Development involving three or more existing erven or subdivisions	No
1.6.5	Development involving three or more erven or divisions that have been consolidated within past five years	No
1.6.6	Rezoning of site exceeding 10 000m ²	Yes
1.6.7	Any other development category, public open space, squares, parks, recreation grounds	Yes - the site was historically in use as recreational grounds.

1.7 Property details

1.7	Property details	
1.7.1	Name and location of the property	Loftus Sports Fields
1.7.2	Erf or farm numbers	Portions 414/418, 1552 and Portion 397 Arcadia,
1.7.3	Magisterial district	Pretoria
1.7.4	Local authority responsible	City of Tshwane
1.7.5	Current use	Vacant (Historically sporting facilities)
1.7.6	Current zoning	Special

CULTMATRIX

1.7	Property details	
1.7.7	Land use of surrounding properties	Sporting, residential and office
1.7.8	Extent of the property	32 300,5m ²

1.8 Property ownership

1.8	Property owners	
1.8.1	Name	Blue Bulls Rugby Union (BBRU) Loftus Versfeld, Kirkness Street, Pretoria 0002
1.8.2	Contract address	+27 12 420 0700
1.8.3	Telephone number	+27 12 343 9436
1.8.4	Fax number	
1.8.5	E-mail	See attached

1.9 Developer

1.9	Developer	
1.9.1	Name and contact address	Abland (Pty) Ltd. Abcon House, Fairway Office Park, 52 Grosvenor Road Bryanston, Johannesburg
1.9.2	Telephone number	+27 11 510 9999
1.9.3	Fax	+27 11 510 9990
1.9.4	E-mail	laetitia.cook@abland.co.za

1.10 Architects

1.10	Architect	
1.10.1	Name and contact address	Studio 3 Architects International Pty (Ltd)
1.10.2	Telephone number	+27 12 348 2005
1.10.3	Fax	-
1.10.4	E-mail	dirkhelen@studio3architects.co.za

1.11 Heritage assessment practitioner

1.11	Specialist	
1.11.1	Name and contact address	Nicholas Clarke, for Cultmatrix (Pty) Ltd, 229 Klip Street, Muckleneuk, Pretoria, 0002
1.11.2	Qualifications and field of expertise	MPhil (Cantab), SACAP, ICOMOS-SA, heritage architect
1.11.3	Relevant experience in study area	Heritage consulting work on various built environment projects including various HIA's on National Level with international heritage consultancy experience.
1.11.4	Telephone number	(076) 375-0680
1.11.5	Fax number	086 515 0710
1.11.6	E-mail	njc.arch@gmail.com