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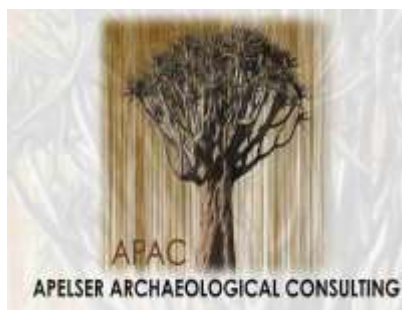
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Comprehensive and Professional Solutions for all Heritage Related Matters

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VAT NO.: 4360226270

APAC022/04

2022-01-21

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

RE: Motivation for Exemption from a full Phase I Heritage Impact Assessment - Proposed Residential Development to be known Linksfield X10 on Portion 438 of Doornfontein 92IR, Gauteng Province.

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 proposed Residential Development to be known Linksfield X10 on Portion 438 of Doornfontein 92IR, Gauteng Province.

Background to the Project

Bokamoso Landscape Architects & Environmental Consultants CC was requested to undertake a study for proposed Residential Development (Linksfield X10) on Portion 438 of Doornfontein 92IR, Gauteng Province. There are some existing residential structures in the study area and development footprint that will be retained, while new residential structures will be built on a portion of the area. Another portion of the area will be kept as open space and will not be developed.

“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) 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

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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 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 Act the following is protected as cultural heritage resources:

- a. Archaeological artefacts, 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 000m² or involve three or more existing erven or subdivisions thereof.
- d. Re-zoning of a site exceeding 10 000m².
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority.

Results of Desktop Heritage Assessment: Proposed Linksfeld Extension 10 Residential Development - Portion 438 of Doornfontein 92IR

The proposed development area is located on Portion 438 of the farm Doornfontein 92IR in Linksfeld, Gauteng. The study area is bordered by established urban residential and other related developments. As a result the larger geographical area has been extensively altered from its original natural and historical landscape. As a result of these developments any archaeological and/or historical sites, features or material that could have existed here in the past would have been heavily disturbed or destroyed as a result.

The development & study area itself has been fairly extensively disturbed in the recent past, with existing residential developments on it as well. Only a small portion of the area still retains its natural landscape (see Sensitivity Map below). The existing residential structures (younger than 60 years of age) will be retained by the developer, while new residential structures will be built on a section of the study area. Other undeveloped portions will be left as open spaces.

Aerial images (Google Earth) of the study and development footprint area shows the fairly disturbed nature of the area, while no remains of cultural heritage significance is visible on any of these images. The only remains known in the area where the residential development is proposed to take place consists of the remnants of an old swimming pool. These are however not of historical origin or significance and can be demolished without further assessment.

Portion 438 of Doornfontein 92IR Sensitivity Map



Figure 1: Sensitivity Map (courtesy Bokamoso Landscape Architects & Environmental Consultants CC).

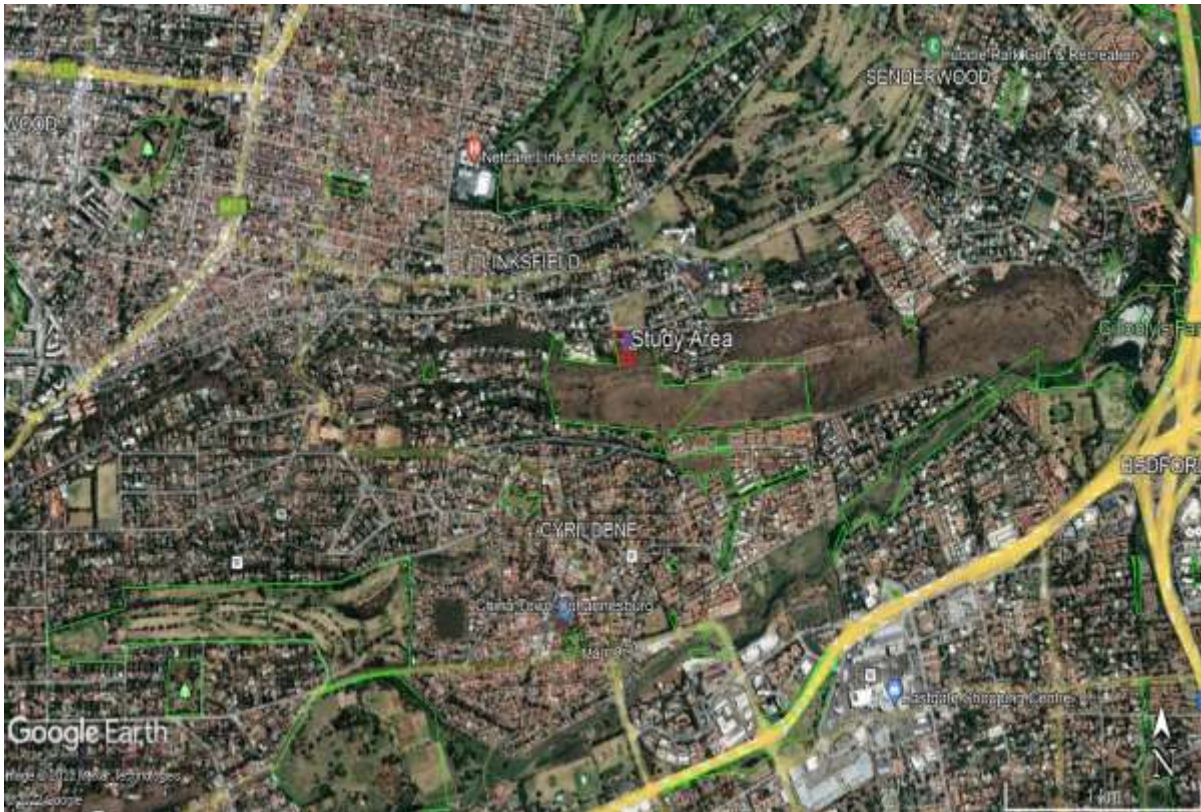


Figure 2: General location of study area (Google Earth 2022).

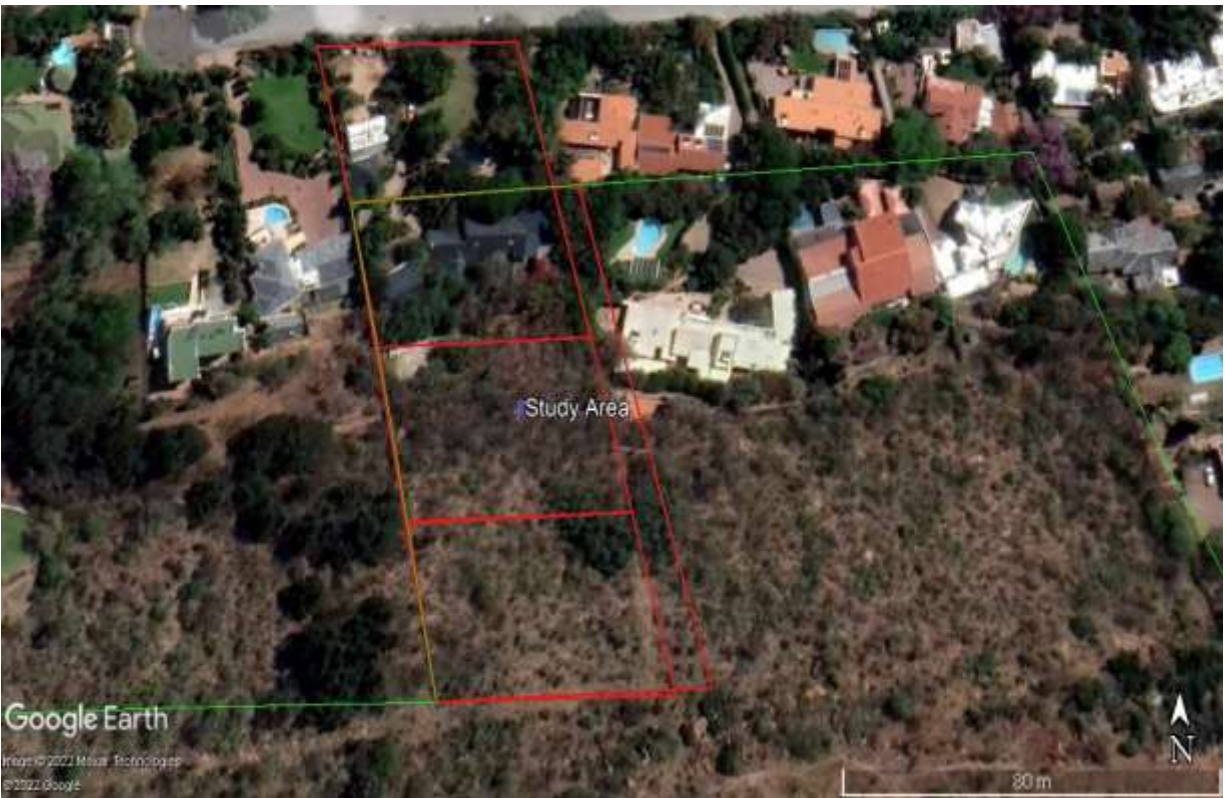


Figure 3: A closer view of the study area location & footprint. Note the existing residential structures on portions, as well as the sections that are still undeveloped and open (Google Earth 2022).

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 in 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).

The closest known Stone Age sites are located at Melvillekoppies, **Linksveld** & Primrose, dating to the Middle and Later Stone Age periods (Bergh 1999: 4).

Although there is known Stone Age sites in the larger Linksveld area, none is known in the specific study & development area footprint. It is envisaged that if any are to be found there it would be single out of context artefacts, or small scatters of material, on the surface of the area

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.

As with the Stone Age, Bergh (1999) does not indicate any known Early (EIA) Iron Age sites in the specific or larger geographical area, although extensive stone-walled Late Iron Age sites are known to exist in the much larger geographical area (e.g. at Klipriviersberg)[Bergh 1999: 6].

Based on Tom Huffman's research it is possible that LIA sites, features or material could be present in the larger area. This will include the Ntsuanatsatsi facies of the Urewe Tradition, dating to between AD1450 and AD1650 (Huffman 2007: 167); the Uitkomst facies of the same tradition (AD1700 to AD1820) found for example at Linksveld & Klipriviersberg [p.171]; as well as the Buispoort facies of Urewe, dating to around AD1700 – AD1840 (p.203) and found at the Suikerbosrand.

As with the Stone Age, there are no known Iron Age sites or features in the study & proposed development area. None (such as the typical stone-walled structures associated with the Late Iron Age) are also visible on the aerial images of the area.

The historical age started with the first recorded oral histories in the area. It includes the moving into the area of people that were able to read and write. The first Europeans to move through and into the area were the group of Cornwallis Harris in 1836 (Bergh 1999: 13). These groups were closely followed by the Voortrekkers after 1844 (Bergh 1999: 14).

There are no structures or visible historical remains on the aerial images (Google Earth) of the study and proposed development area, while the only remains identified are those of an old swimming pool (**see client pictures below**). These remains are of no historical significance.



Figure 4: Aerial view of the area dating to 2001. Existing residential structures are visible, while construction on others are also evident (Google Earth 2022).



Figure 5: The same area in 2007 (Google Earth 2022).



Figure 6: The area in 2017 (Google Earth 2022).



Figure 7: Remains of an old swimming pool in the area where the residential development is planned (courtesy Bokamoso Landscape Architects & Environmental Consultants CC).

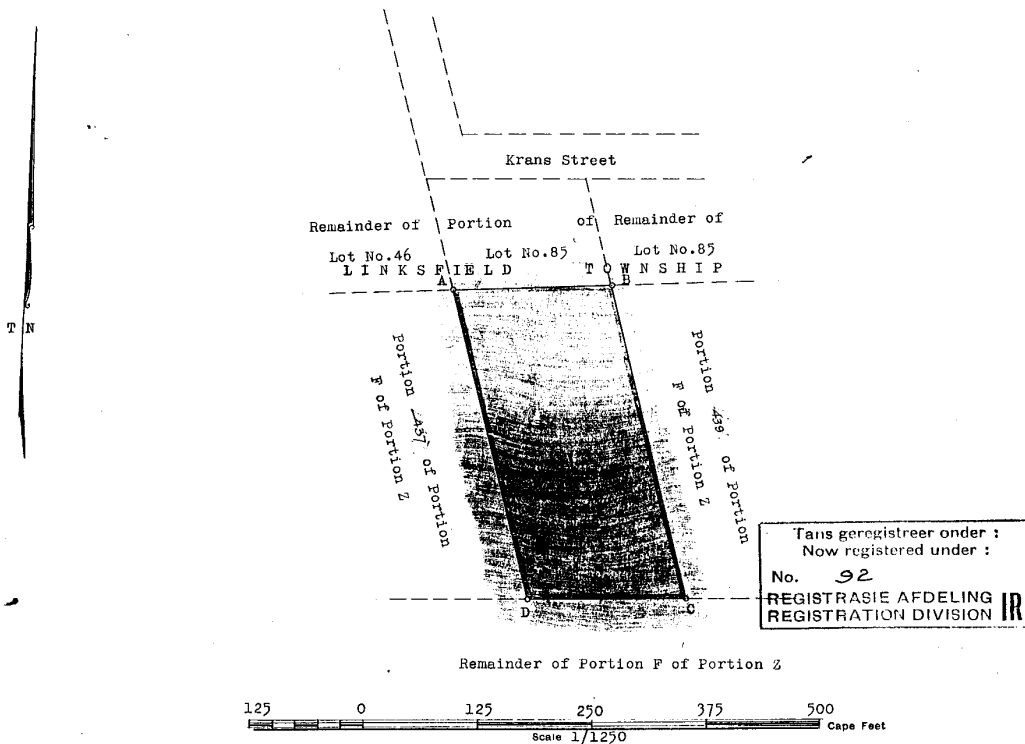
A 1939 map for Portion 438 of the farm obtained from the database of the Chief Surveyor General (www.csg.dla.gov.za – **CSG Document: 10HZ9U01**) indicates that this portion of the farm was surveyed in April 1939 and that the farm was then numbered as No.24 and was located in the District of Johannesburg and Province of Transvaal. No historical structures or sites are shown or visible on this map.

Approved

Asst. Surveyor General

SIDES Cape Feet	ANGLES of Direction	System Goldfields CO-ORDINATES	
		y	x
AB 174.20	AB 175 57 50 A	+ 19080.44	- 15202.19
BC 357.20	BC 254 1 0 B	+ 19092.70	- 15375.96
CD 175.48	CD 357 48 0 C	+ 18749.31	- 15474.32
DA 351.46	DA 74 1 0 D	+ 18742.57	- 15298.97

A,B,C,D, are round iron pegs.



The figure ABCD represents 60387 Square Feet mergen of land being
 Portion 438 of Portion F of Portion Z of the farm
 DOORNFONTEIN NO. 24

situate in the DISTRICT of Johannesburg PROVINCE of TRANSVAAL

Surveyed in April 1939 by me

R. J. ...
 Land Surveyor IR 92/99

This diagram relates to Deed of No. <u>1161/44</u> dated <u>11/11/44</u> In favour of _____	The original diagram is No. A 456426 of 1931 relating to Deed of Transfer No. 3678/27 dated _____ In favour of _____	S.G. File No. _____ Survey Records No. 1187 39 Compilation No. 15/203 Lat. South 26° 10' Long. East 28° 8' Degree Sheet, No. Heidelberg Q. 17.
	Registrar of Deeds	IR 92/99

FORM 446. M. L. ESSON & CO. LTD. JOHANNESBURG. PRINTED AND PUBLISHED BY AUTHORITY OF S.G., TRANSVAAL.

Figure 8: A 1939 map of Portion 438 of the farm Doornfontein 92IR (www.csq.dla.gov.za).

To conclude, based on the aerial images of the area, photographic documentation of the development site and the heritage desktop study it is therefore deemed unlikely that any significant sites, features or

material of cultural heritage (archaeological and/or historical) origin and/or significance will exist in the study area. Recent historical activities (mainly residential development & related activities) 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 Residential development to be known as Linksfield X10 on Portion 438 of Doornfontein 92IR, located in Linksfield 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 'Anton Pelser', written in a cursive style.

Anton Pelser

References

1. General & Closer Views of Study Area location and proposed development footprint: Google Earth 2022.
2. Sensitivity Map and Site Photographs: courtesy Bokamoso Landscape Architects & Environmental Consultants CC
3. Bergh, J.S. (red.). 1999. **Geskiedenisatlas van Suid-Afrika. Die vier noordelike provinsies.** Pretoria: J.L. van Schaik.
4. Huffman, T.N. 2007. **Handbook to the Iron Age: The Archaeology of Pre-Colonial Farming Societies in Southern Africa.** Scottsville: University of KwaZulu-Natal Press.
5. Lombard, M., L. Wadley, J. Deacon, S. Wurz, I. Parsons, M. Mohapi, J. Swart & P. Mitchell. 2012. South African and Lesotho Stone Age Sequence Updated (I). **South African Archaeological Bulletin 67 (195): 120–144, 2012.**
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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): Document 10HZ29U01.