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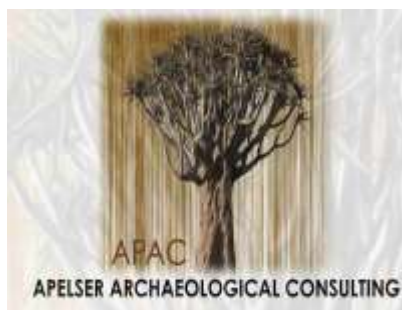
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Comprehensive and Professional Solutions for all Heritage Related Matters

**CK 2006/014630/23**

**VAT NO.: 4360226270**

**APAC020/15**

**2020-02-26**

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 MONUMENT PARK STUDENT HOUSING ESTABLISHMENT ON A PORTION OF THE REMAINDER OF PORTION 35 OF THE FARM WATERKLOOF 378JR, CITY OF TSHWANE.**

APelsers Archaeological Consulting cc (APAC cc) was appointed by Bokamoso Landscape Architects & Environmental Consultants CC, on behalf of Kanton Eiendom, to undertake a short site assessment and provide a motivation for Exemption from conducting a Full Phase 1 HIA for the proposed Monument Park Student Housing Establishment on a portion of the Remainder of Portion 35 of the farm Waterkloof 378JR. The development and study area are located in Monument Park in Pretoria, City of Tshwane. The site visit was conducted on the 25<sup>th</sup> of February 2020.

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

Kanton Eiendom is proposing the establishment of student housing (the so-called Monument Park Student Housing Project) on a portion of the Remainder of Portion 35 of the original farm Waterkloof 378JR. As part of the process of obtaining authorization, a cultural heritage impact assessment was requested.

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

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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 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 Desktop 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 included a short site visit as well as desktop research as part of the assessment.

### ***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 townsapes;
- 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 Short Site Visit and Desktop Study: Monument Park Student Housing Establishment on a portion of the Remainder of Portion 35 of Waterkloof 378JR***

The development area is located on a portion of the Remainder of Portion 35 of the original farm Waterkloof 378JR on the corners of Trichardt Road and Veldpou Street. The study area is surrounded by already established and on-going industrial, residential and other urban developments. This includes the Hi-Q Dastek Building and an existing Sasol Filling Station. The topography of the study area is very flat and open with little grass and no tree cover hampering visibility. Some quarrying (sand) is being undertaken in the eastern corner of the development area.

The area would have been utilized in the historical past for agricultural purposes, while recent urban & other development activities would also 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 flat, open and disturbed nature of the area and the likelihood of any sites, features or material of cultural heritage significance being present is very slim. A walk-through in the area also did not find any traces of sites or features or material of cultural heritage nature.



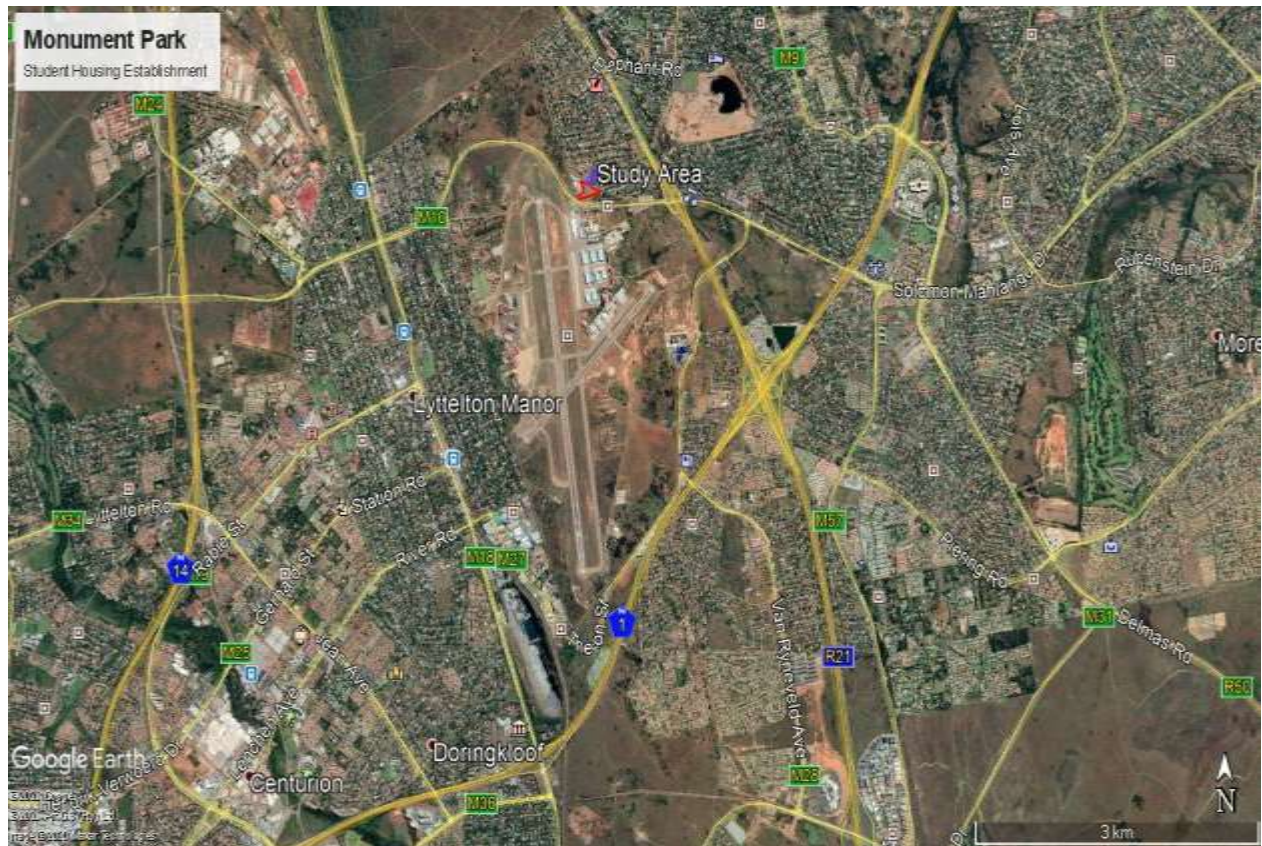


Figure 1: General location of study area (Google Earth 2020).



Figure 2: Closer view of the area (Google Earth 2020). Note the flat and open nature of the area as well as the neighbouring residential and other developments (Google Earth 2020).



Figure 3: Site Development Plan (provided by Bokamoso Landscape Architects and Environmental Consultants CC.)





**Figure 4: A view of a section of the study area.**



**Figure 5: A view of the quarrying/sand works in the study area.**



**Figure 6: Another view showing neighbouring residential settlement.**



**Figure 7: Another view showing the flat and open nature of the study area.**





**Figure 8: A general view of the study and development area showing the Hi-Q Dastkek Building and existing Sasol Filling Station as well.**

### **Archaeological & Historical Background**

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 in the study area, and no artifacts from that period were identified during the site assessment. The closest known Stone Age sites are those of the well-known Early Stone Age site at Wonderboompoort and a number of sites in the Magaliesberg area (Bergh 1999: 4). Middle Stone Age material was identified at Erasmusrand and the Groenkloof Nature Reserve (Van Vollenhoven 2006: 183). At the Erasmusrand cave some Late Stone Age tools were also identified as well as at Groenkloof (Van Vollenhoven 2006: 184). LSA material was also found at Zwartkops and Hennops River (Bergh 1999: 4). This last phase of the Stone Age is associated with the San people. If any Stone Age artifacts are to be found in the area then it would more than likely be single, out of context, stone tools. Urbanization over the last 150 years or so would have destroyed any evidence if indeed it did exist.

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.

No Early Iron Age sites are known in the larger geographical area of Pretoria, while Later Iron Age sites do occur in the Pretoria area (Bergh 1999: 7). The closest known LIA sites are at Silver Lakes and near Mamelodi on the farm Hatherley (Van Schalkwyk et.al 1996). These sites are related to the Manala Ndebele (Bergh 1999: 10) who was present in the area at the time when the first Europeans arrived here during the mid-19th century.

Iron Age occupation of the area did not start much before the 1500s. By that time, groups of Tswana and Ndebele speaking people were moving into the area, occupying the different hills and outcrops, using the ample resources such as grazing, game and metal ores. During the early decades of the 19th century, the Tswana- and Ndebele-speakers were dislodged by the Matabele of Mzilikazi. Internal strife caused Mzilikazi, a general of King Shaka, and his followers to move away from the area between the Thukela and Mfolozi River (KwaZulu-Natal). Eventually, after a sojourn in the Sekhukhuneland area, followed by a short stay in the middle reaches of the Vaal River, they settled north of the Magaliesberg. One of three main settlements established by them, eKungwini, was on the banks of the Apies River, just north of Wonderboompoort. However, no remains of this settlement have ever been identified. It was during the Matabele's stay along the Apies River that the first white people entered the area: travelers and hunters such as Cornwallis Harris and Andrew Smith, traders Robert Schoon and Andrew McLuckie, and missionaries James Archbell and Robert Moffat. It is known from oral history the Robert Schoon sent Mzilikazi huge quantities of glass trade beads, rather than the guns that the latter coveted so much (Van Schalkwyk 2013: 7-8).

**No Iron Age sites, features or cultural material was identified during the assessment of the study area.**

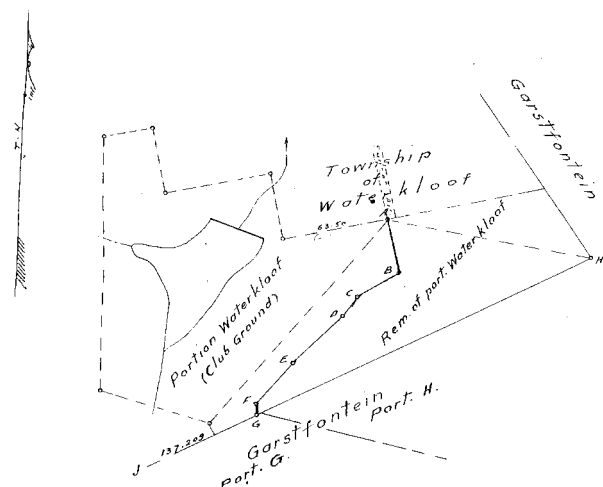
The historical age started with the first recorded oral histories in the area. It includes the moving into the area of people that were able to read and write. The first Europeans to move through and into the area were the groups of Schoon and McLuckie and the missionaries Archbell and Moffat in 1829 (Bergh 1999: 12). They were followed by others such as Andrew Smith (1835), Cornwallis Harris (1836) and David Livingstone in 1847 (Bergh 1999: 13). These groups were closely followed by the Voortrekkers after 1844 and Pretoria was established in 1855 (Bergh 1999: 14-17). White settlers started to occupy huge tracts of land, claiming it as farms after the late 1840s. Of these, some of the earliest were Lucas Bronkhorst (Groenkloof), David Botha (Hartebeestpoort – Silverton) and Doors Erasmus (Wonderboom). With the establishment of Pretoria (1850) services such as roads, started to develop. An increase in population also demanded more food, which stimulated development of farming on the alluvial soils on the banks of the Apies River, close to the water (Van Schalkwyk 2013: 8).

A 1921 map for a portion of the farm Waterkloof 378JR from the database of the Chief Surveyor General ([www.csg.dla.gov.za](http://www.csg.dla.gov.za) – CSG Document 10HCL601 is the oldest map that could be obtained. The farm was then numbered as 29 and was located in the District of Pretoria, Ward of Witwatersrand and Province of Transvaal. It was framed in February 1892 and relates to a Deed of Transfer to one W.R. Keet on the 23<sup>rd</sup> of February 1887. This portion was surveyed in May 1921.

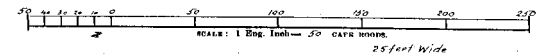
Form 19.—Diagram Form for a Sub-Division of a Farm or portion of a Farm.

S.G. No. A. 1664/21

SIDES		ANGLES		(X) CO-ORDINATES (X)		SIDES		ANGLES		COORDINATES			
AB	34.85	A	67.6 10	A	-227.01	-328.23	AB	34.705	A	67.6 10	A	-227.006	-328.237
BC	29.13	B	248.10 10	B	-240.04	-210.11	BC	29.13	B	248.10 10	B	-240.046	-210.112
CD	14.76	C	157.37 20	C	-277.85	-382.37	CD	14.735	C	157.37 20	C	-277.882	-382.284
DE	42.31	D	188.38 30	D	289.88	-374.28	DE	42.264	D	188.38 30	D	289.879	-374.186
EA	34.23	E	178.26 0	E	321.33	-348.03	EA	34.188	E	178.26 0	E	321.338	-348.000
FA	6.48	F	142.33 20	F	-398.870	-325.280	FA	6.440	F	142.33 20	F	-398.833	-325.284
GA	221.801	G	61.28 0	G	-385.243	-125.577	GA	221.801	G	61.28 0	G	-385.243	-125.577
HA	128.762	H	38.28 50	H	-247.943	-519.203	HA	128.762	H	38.28 50	H	-247.943	-519.203



Trans. registered under:  
 Gov. registered under:  
 No. 378 316  
 REGISTRAR OF DEEDS  
 TRANSVAAL DIVISION JR



The above Beacons lettered A B C D E F G define the Western side of a Right of Way, 25 feet wide, over a portion of the Farm, and have been properly erected according to law.

— WATERKLOOF N° 29 —  
 framed by Surveyor M. H. Walker in Feb 1892

relating to Deed of Transfer No. 506/1887 dated 23. 2. 1887 made in favour of W. R. Keet  
 situate in the District of Pretoria Ward Witwatersrand V Province of Transvaal.

The Beacons were pointed out by A. J. Verdoorn

Surveyed In May 1921 by me J. H. Johnson Land Surveyor.

Framed for the purpose of registering a Right of Way

No. A 1664 examined. The numerical data of this diagram are sufficiently consistent.

Approved: J. H. Johnson, Surveyor-General.

Examiner of Diagrams: J. H. Johnson, Surveyor-General's Office, Pretoria.

This diagram belongs to Deed of Transfer No. made this day in favour of

Deeds Office, Pretoria. Registrar of Deeds.

Published by authority:—Groot & Strydom, P.O. Box 2684, Johannesburg.—25/4/21.

T.P.S. (P.T.A. REGION.)

Figure 9: A 1921 map of a portion of Waterkloof 378JR ([www.csg.dla.gov.za](http://www.csg.dla.gov.za)).

Based on the site assessment, aerial images and 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) would have impacted on any if they did exist here in the past and would have disturbed or destroyed these to a large degree.

**It is therefore recommended that Exemption from a Full Phase 1 Heritage Impact Assessment (HIA) for the proposed Monument Park Student Housing Establishment on a portion of the Remainder of Portion 35 of Waterkloof 378JR 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

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2. General & Closer Views of Study Area location and footprint: Google Earth 2020.
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11. Chief Surveyor General Database ([www.csg.dla.gov.za](http://www.csg.dla.gov.za)): Document 10HCL601.