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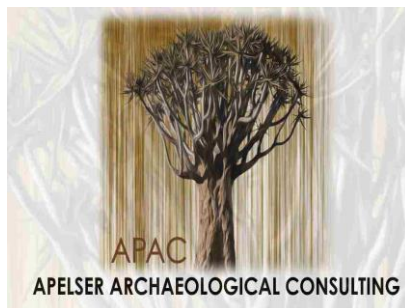
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APAC023/27

2023-03-20

To: Me. Natasha Higgitt
Manager: Development Applications

**South African Heritage Resource Agency
P O Box 4637
Cape Town
8000**

RE: Motivation for Exemption from a full Phase I Heritage Impact Assessment & Exemption from Demolition of Structures on Portion 64 (a Portion of Portion 1) of Buffelspoort 343JQ, near Marikana in the Northwest Province

APelser Archaeological Consulting cc (APAC cc) was appointed by AB Enviro Consult, on behalf of Tharisa Minerals Proprietary Limited, to provide a motivation for Exemption from a Full Phase 1 HIA for the proposed establishment of a Clinic, located on Portion 64 (Portion of Portion 1) of the farm Buffelspoort No. 343-J.Q., North West Province. In order to establish the proposed development, 2.2489ha of indigenous vegetation will have to be cleared. A number of structures (recent farming-related) are situated on the land parcel as well and will have to be demolished to make way for the new Clinic. If these structures are determined to be older than 60 years of age, then motivation for Exemption from Full Demolition Permit Application had to be provided as well.

Background to the Project

AB Enviro Consult was requested by Tharisa Minerals Proprietary Limited (the landowner) to obtain Environmental Authorization for the proposed establishment of a Clinic, located on Portion 64 (Portion of Portion 1) of the farm Buffelspoort 343J.Q, in the North West Province. In order to establish the proposed development, 2.2489ha of indigenous vegetation will have to be cleared. It is proposed that the Clinic will cover an area of 702,29 square meters. An Ablution Facility of 104,90 square meters and a covered Entrance of 38,30 square meters is also proposed. In addition to the proposed infrastructures, provision will also be made for 206 parking Bays and interlocking brick paved driveways.

AJ Pelser BA (UNISA), BA (Hons) (Archaeology) [WITS], MA (Archaeology) [WITS]

Beatrix Bed & Breakfast Trading as A Pelser Archaeological Consulting

The proposed development will make provision for the following:

Clinic (702,29m²) with:

Waiting area
X-ray room
Consulting rooms
Emergency room (24/7)
Eye test room
Hearing audio room

Ablution facility (104,90m²)

Guard / gate house (for entrance and exit control)
Parking area and ambulance parking (interlock brick paved drive-way)
Medical waste storage,
Four (4) filling containers.

The intention is to demolish the existing dwelling house.

Water to the concerned property will be provided by means of a borehole, to serve:

20 000 litres for fire suppression.
40 000 litres for domestic water.

Sewer to the concerned property will be provided by means of a septic tank. Domestic waste will be dumped at a licensed municipal dumping site. Medical waste will be collected and removed by a registered service provider. Electricity to the concerned property will be provided by Eskom, with a 350KVA to 500KVA backup generator.

“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 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 (Act 25 of 1999)

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.

The National Environmental Management Act (No. 107 of 1998)

This Act states that a survey and evaluation of cultural resources must be done in areas where development projects, that will change the face of the environment, will be undertaken. The impact of the development on these resources should be determined and proposals for the mitigation thereof are made.

Environmental management should also take the cultural and social needs of people into account. Any disturbance of landscapes and sites that constitute the nation's cultural heritage should be avoided as far as possible and where this is not possible the disturbance should be minimized and remedied.

The specific requirements that specialist studies and reports must adhere to are contained in Appendix 6 of the EIA Regulations.



Figure 1: General location of the study & proposed development area (Google Earth 2023).



**Figure 2: Closer view of the study & proposed development area footprint (Google Earth 2023).
Note the existing structures on the property.**

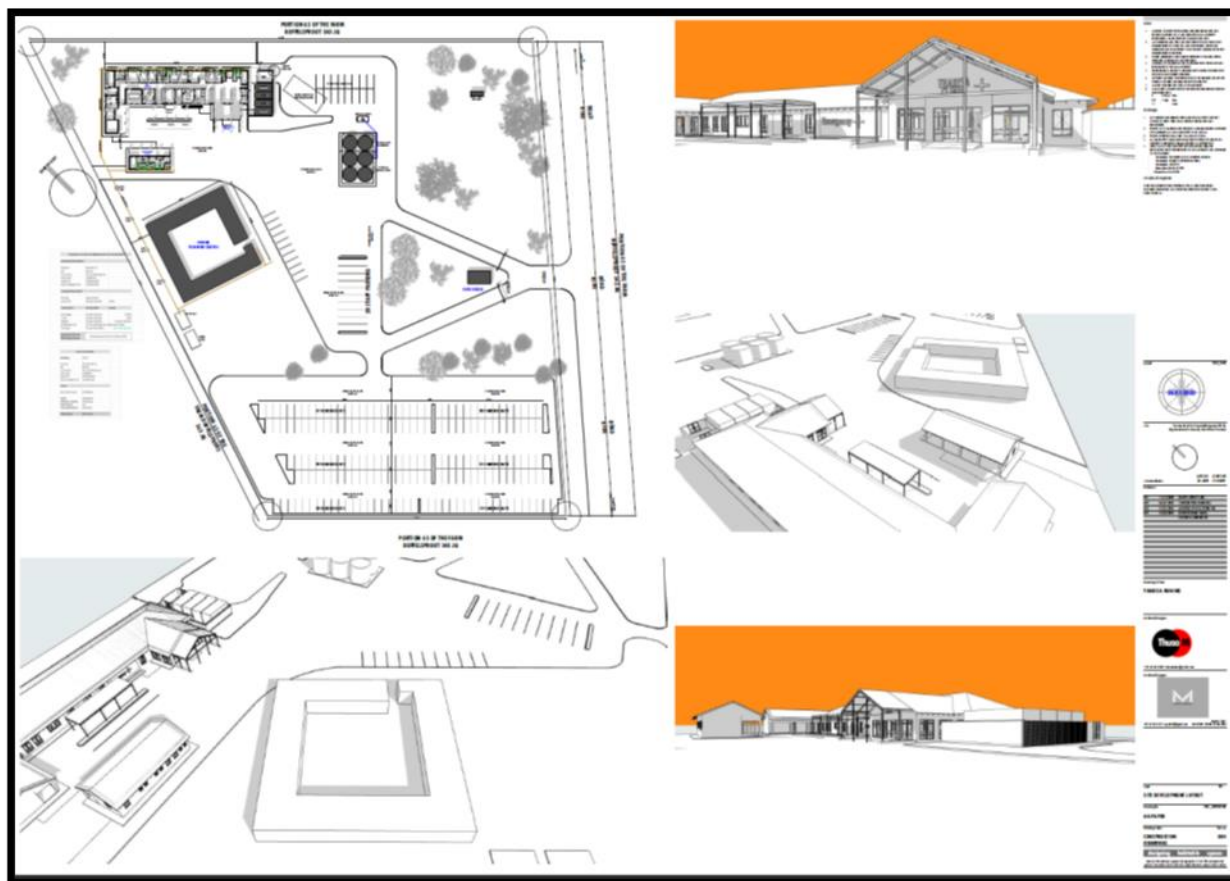


Figure 2: Site development plan (provided by AB Enviro Consult).

Results of Desktop Heritage Assessment: Proposed Tharisa Minerals Clinic Development

The proposed development area is located on Portion 64 (a Portion of Portion 1) of the farm Buffelspoort 343JQ, between Mooi-nooi & Marikana in the Northwest Province. The study & development area is relatively flat and open, with no rocky outcrops, ridges and hills present. Although the Heritage Specialist did not undertake a physical site assessment, site photographs provided by the client shows the topography of the area, while also indicating the nature of the vegetation and the impacts of recent farming-related activities on the property. Agricultural activities, such as ploughing, as well as the construction of various structures (homestead and related outbuildings) have impacted on the specific land parcel in the recent past, and if any sites, features or material of cultural heritage (archaeological and/or historical) did exist here, it would have been extensively disturbed or destroyed as a result.

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).

There are no known significant Stone Age sites or features in the specific study area. The closest known Stone Age sites in the larger geographical area are located in the so-called Magaliesberg Research Area

and include rock shelter sites dating to the Middle and Later Stone Age. There is also some rock engraving sites in this area (Bergh 1999: 4-5).

No Stone Age sites or material are known to exist in the specific study area. 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.

Late Iron Age sites have been identified in the larger geographical area. In a band stretching roughly from Brits in the east to Zeerust in the west many Iron Age sites have been discovered previously (Bergh 1999: 7-8). These all belong to the Later Iron Age (Bergh 1999: 8-9). A copper smelting site was identified along the Hex River to the northwest of the surveyed area (Bergh 1999: 8). A copper smelting site was identified along the Hex River to the northwest of the surveyed area (Bergh 1999: 8). The closest Earlier Iron Age site is located at Broederstroom near Brits (Bergh 1999: 6).

During earlier times the area was settled by the Fokeng. In the 19th century this group inhabited this area with other Tswana groups including the Kwena and the Po (Bergh 1999: 9-10). During the *difaqane* these people moved further to the west, but they returned later on (Bergh 1999: 11).

According to the research of Tom Huffman the following Iron Age traditions could be present in the area: (a) the Mzonjani facies of the Urewe tradition (Broederstroom) dating to AD450 – AD750 (b) Olifantspoort facies of the same tradition AD1500 – AD1700 (c) Uitkomst facies of Urewe AD1650 – AD1820 and (d) Buispoort facies of Urewe dating to around AD1700 - AD1840 (Huffman 2007: 127; 171; 191 & 203). Late Iron Age stonewalled sites have been recorded during earlier surveys for mining development on Elandsdrift 467JQ, Buffelsfontein 465JQ and Buffelspoort 343JQ (Pelser 2009; 2012), and it is possible that similar sites could have been located in this area as well.

No Iron Age sites, features or objects are known to exist in the study & development area. If any did exist the extensive disturbances of the recent past would have destroyed all evidence.

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. Early travelers have moved through this part of the Northwest Province. This included David Hume in 1825, Robert Scoon and William McLuckie in 1829 and Dr. Robert Moffat and Reverend James Archbell in 1829 (Bergh 1999: 12, 117-119). Hume again moved through this area in 1830 followed by the expedition of Dr. Andrew Smith in 1835 (Bergh 1999: 13, 120-121). In 1836 William Cornwallis Harris visited the area. The well-known explorer Dr. David Livingstone passed through this area between 1841 and 1847 (Bergh 1999: 13, 119-122). The area around Mooinooi, including the surveyed area was inhabited by white pioneers as early as 1839 (Bergh 1999: 15). The Battle of Buffelspoort (3 December 1900) was also fought in close vicinity of the development area during the Anglo-Boer War (1899-1902).

The only recent historical sites, features or material identified in the study & development area, are the existing homestead and related outbuildings on the property. These are however not older than 60 years of age, and have no historical or cultural heritage significance.

The Portion 64 map for the farm obtained from the database of the Chief Surveyor General (www.csg.dla.gov.za – **CSG Document: 10FV5001**) dates to 1993 & indicates that this portion of the farm was surveyed between August 1990 and September 1991. No structures are shown on this survey map, and although this does not mean that were none present there at the time, it is possible that many of the current structures existing on Portion 64 was only constructed after the September 1991 date.

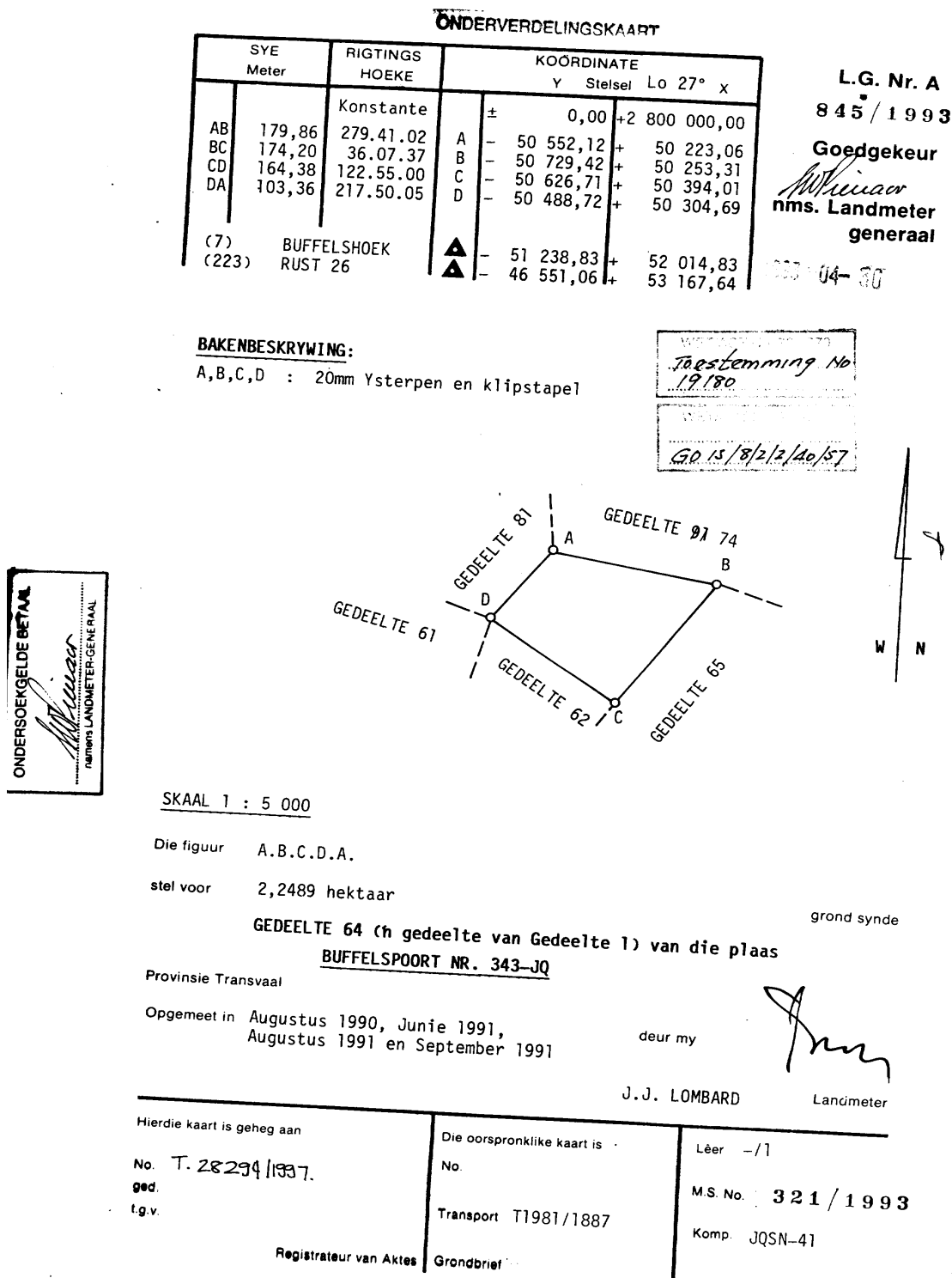


Figure 4: 1993 Map of Portion 64 of Buffelspoort 343JQ (www.csg.dla.gov.za).

The aerial images (Google Earth) of the study and proposed development area shows the impacted nature of it, and if and it is highly unlikely that any sites, features or material of cultural heritage origin and significance would exist here. The photographs of the existing structures on the property was scrutinised to see whether or not of any of these are older than 60 years of age or of cultural heritage significance. It was clear from these – based on the construction of and the materials used, that none of the structures are older than 60 years of age. Some of these might date to the late 1970's, while a number date to the 1990's onwards. ***There is therefore no need, from a Cultural Heritage point of view, to apply for a demolition permit from SAHRA.***



Figure 5: Aerial image of the area dating to 2004. The agriculturally disturbed nature of the property is evident (Google Earth).



Figure 7: One of the structures on the property.



Figure 8: A view of the main homestead. This, and some of the other structures probably dates to the 1970's.



Figure 9: Another of the structures on the property dating to the 1970's onwards.



Figure 10: This face-brick built structure (garage) likely dates to the early 1990's.



Figure 11: Another view of the brick structure/homestead dating to the 1990's.



Figure 12: The main entrance gate to the property.

To conclude, based on the aerial images of the area, 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 & proposed development area. Recent historical activities (mainly farming-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. 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 actions related to the proposed development.

It is therefore recommended that Exemption from a Full Phase 1 Heritage Impact Assessment (HIA) for the Proposed Development of the Tharisa Clinic, on Portion 64 (a Portion of Portion 1) of the farm Buffelspoort 343JQ, between Mooiooi and Marikana in the Northwest Province, 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 and/or cemeteries.

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', with a stylized, cursive script.

Anton Pelser

References

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