# REHABILITATION PLAN FOR THE BURIAL GROUND AT THE JUNCTION OF THE HEIDELBERG RD (R23) AND GELUKSDAL RD, TSAKANE TOWNSHIP, EKURHULENI

# **CONSERVATION MANAGEMENT PLAN**

# Prepared by

# **Edward Matenga**

(PhD Archaeology & Heritage, MPhil, Archaeology; Uppsala/Sweden)

Tuesday, 16 March 2021



(AHSA) Archaeological and Heritage Services Africa (Pty) Ltd Reg. No. 2016/281687/07

48 Jacqueline Street
The Reeds, 0157, Centurion, Pretoria
E.mail:

# **EXECUTIVE SUMMARY**

- This Conservation Management Plan (CMP) is a schedule of measures to protect a burial ground situated at the junction of the Heidelberg Road (R23) and Geluksdal Rd near Tsakane in the City of Ekurhuleni.
- 2. The City of Ekurhuleni is implementing an urban improvements design plan for the main entrance to Tsakane Township at the junction of the above named roads.
- 3. Damage to the graves caused by a grader was noticed at the beginning of the operations. The machine excavation was superficial stripping and only the grave markers were damaged in the process. Since no bones were exposed, the focus of the proposed rehabilitation are the grave markers and putting a protective perimeter fence around the graves.

# 4. Statement of Significance of the heritage resources

The purpose of the CMP is to put in place measures to retain the value of a heritage resource. A statement of cultural significance of the heritage is prepared to justify the allocation of resources (time, money, and personnel) for their conservation and management. Cultural value or significance underpins the relationship between the heritage, local communities and the broader public: Although the damage to the graves was only superficial, a plan for sustainable conservation is necessary in light of public sensitivities about the treatment of graves and human remains and the proximity of the burial ground at the junction of two major and busy roads renders the protection measures imperative. The subject of graves, burials and human remains is situated in the public heritage discourse in South Africa. General perception is that some developers are not taking responsibility for the protection of graves where they may be seen to be standing in the way of a development plan. Growing controversy and acrimony on grave relocations sometimes have resulted in relations between individuals, groups of individuals or communities on one hand and developers on the other deteriorating to a nasty standoff. The purpose of the CMP is to apply additional tools for curating graves under these circumstances. The families affiliated with

the graves attach spiritual and sentimental value to the graves. They have accepted that the damage was inadvertent and accidental because the graves were concealed by summer grass. The have approved the rehabilitation plan.

# 5. Strategic Objectives of the CMP

The following are Strategic Objectives of the Conservation Management Plan:

- **SO 1**: Implementing the Rehabilitation Plan for the graves.
- **SO 2:** Encouraging collaboration among stakeholders to protect the burial ground.
- **SO 3.** The Strategic Objectives for the CMP and the Action Programmes must be incorporated into the Environmental Management Programme (EMPr).

## 6. Key Actions

- (i) Rehabilitation of the burial ground: Architectural plans of a proposed protective perimeter fencing have been drawn and approved by the affected families and the City of Ekurhuleni.
- (ii) The rehabilitation of the burial ground will be monitored by the Environmental Control Officer.
- (iii) The Environmental Control Officer will also be responsible for routine monitoring during physical works for the road improvements.
- 7. A Monitoring, Evaluation, Learning and Intervention (MELI) tool will be established for the CMP in which the main actors will be the City of Ekurhuleni, Environmental Control Officer employed by the Civil Engineers and SAHRA BGG.

# **TABLE OF CONTENTS** EXECUTIVE SUMMARY......2 1. INTRODUCTION ...... 6 What is an integrated Conservation Management Plan? ...... 6 Heritage and conservation ......7 1.2. 2. APPROACH TO CMP PLANNING AND METHODOLOGY......7 Structure of the Conservation Management Plan......7 Situational analysis ......7 2.2. Mitigation for the graves ......8 2.3. 4. LOCATION AND ENVIRONMENTAL SETTING......9 5. HISTORICAL CONTEXT ......11 6. KEY STAKEHOLDERS AND CONTACT DETAILS......13 7.2. THE PAST AND PRESENT USES OF THE HERITAGE......16 STATE OF CONSERVATION OF THE GRAVES......17 10. GUIDING PRINCIPLES...... 18 11. 12 VISITOR MANAGEMENT ......19 OBJECTIVES, STRATEGIES AND ACTION PLANS TO COVER: SITE MANAGEMENT, PRESENTATION, INTERPRETATION, SAFETY, RESEARCH 13.1. 13.2. A SYSTEM WHEREBY APPROVALS FOR CHANGES ARE OBTAINED ..... 22 14. 15. 15.1. 15.2. Mitigation Measures......23 15.3.

16.

## **ABBREVIATIONS**

CMP Conservation Management Plan

COE City of Ekurhuleni

ECO Environmental Control Officer

EIA Environmental Impact Assessment
EMP Environmental Management Plan

EMP Environmental Management Plan
EMPr Environmental Management Programme

HIA Heritage Impact Assessment

PHRA Provincial Heritage Resources Authority
NEMA National Environmental Management Act

NHRA National Heritage Resources Act

SAHRA BGG South African Heritage Resources Agency Burial Ground and Graves Unit

# 1. INTRODUCTION

This Conservation Management Plan (CMP) is a schedule of measures to protect a burial ground situated at the junction of the Heidelberg Road (R23) and Geluksdal Rd The City of Ekurhuleni is implementing an urban improvements design plan for the main entrance to Tsakane Township at the junction of the above named roads. The aim is to improve vehicular traffic movement at this major intersection and landscaping necessary to enhance views considering that this is the principal gateway into Tsakane Township.

Damage to the graves caused by a grader was noticed at the beginning of the civil works. The machine excavations were superficial stripping and only the grave markers were damaged as a result. Since no bones were exposed, the focus of the proposed rehabilitation are the grave markers and putting a protective perimeter fence around the graves.

# 1.1. What is an integrated Conservation Management Plan?

A Conservation Management Plans is necessary for the protection and sustainable management of heritage resources. It is intended to be manual for the curation of graves, and to be effective it is aligned with heritage protection laws and regulations. Management Plans contribute significantly in lowering the risk of uncertainty inherently present in ad hoc decision making and reactive interventions.

Generically, a Conservation Management Plan, also referred to as a Conservation Management Plan (CMP) is prepared with the following aims:

- (i) To develop and implement a sound management system based on the respect of best international practices in the conservation of cultural heritage sites,
- (ii) To set out priorities for sustainable conservation and development of heritage resources,
- (iii) To encourage research to shed more light on the history of the resources as well as well as the best means of preserving them,
- (iv) To create local and national awareness, and building an understanding of the conservation planning process among stakeholders,

- (v) To encourage partnership initiatives and collaboration with key stakeholders such as local communities, government departments and research institutions;
   and
- (vi) To develop educational, cultural and visitation programmes that will create an appreciation among the public for the value of the heritage resources, thereby reinforcing protection measures.

## 1.2. Heritage and conservation

This CMP takes a conservation approach. Conservation is a broad concept which encompasses all the process of looking after a place (such as a grave or burial ground) so as to retain its cultural significance. Conservation embraces many treatment processes such maintenance, preservation, restoration, reconstruction, repair and adaptation, presentation and interpretation. Broadly it also includes ceremonies, public programmes, financing; and many other activities associated with the management of heritage sites are part of conservation.<sup>1</sup>

#### 2. APPROACH TO CMP PLANNING AND METHODOLOGY

## 2.1. Structure of the Conservation Management Plan

The structure of this CMP is adapted from the South African Heritage Resources Agency (SAHRA) *Guidelines for Conservation Management Plans for Heritage Sites* (Updated 2014).

# 2.2. Situational analysis

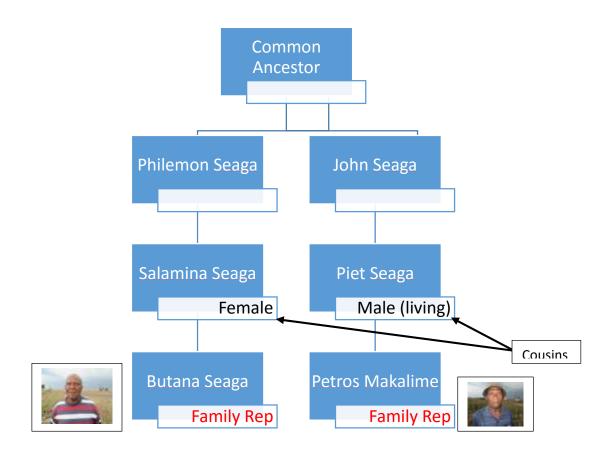
A clear understanding of the nature/type of heritage resources to be managed and their locations requires a situational analysis, and lies on the critical path of the conservation management planning process. A Phase 1 Heritage Impact Assessment was undertaken in 2019 and laid the foundation for understanding the heritage significance of the graves and public sensibilities about the sanctity of graves.

The Burial ground is situated at the junction of the Heidelberg Rd (R32) and the Geluksdal Rd, the latter being the principal entrance to Tsakane Township from

<sup>&</sup>lt;sup>1</sup> The Illustrated Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (2004). Articles 1.4 – 1.9, Article 14.

other nodes in Ekurhuleni, and Johannesburg. A majority of those buried there were members of the Sega family who were working on the Farm Withoek 388 and lived at a workers compound on the farm.

A relationship matrix of the two informants is outlined in the diagram below:



## 2.3. Mitigation for the graves

It has been recommended and an agreement reached with appointed representatives of the affiliated families that the graves must be rehabilitated *in situ*, i.e. at the original location. This understanding is confirmed in sworn affidavits, signed by the family representatives. An architectural concept for the proposed memorial has been shared with the affected families and approved.

#### 3. STATEMENT OF CULTURAL SIGNIFICANCE OF THE HERITAGE

The purpose of the CMP is to put in place measures to retain the value of a heritage resource. A statement of cultural significance of the heritage is prepared to justify the allocation of resources (time, money, and personnel) for their conservation and management. Cultural value or significance underpins the relationship between the heritage, local communities and the broader public:

Although the damage to the graves was only superficial, a plan for sustainable conservation is necessary in light of public sensitivities about the treatment of graves and human remains and the proximity of the burial ground at the junction of two major and busy roads renders the protection measures imperative. The subject of graves, burials and human remains is situated in the public heritage discourse in South Africa. General perception is that some developers are not taking responsibility for the protection of graves where they may be seen to be standing in the way of a development plan. Growing controversy and acrimony on grave relocations sometimes have resulted in relations between individuals, groups of individuals or communities on one hand and developers on the other deteriorating to a nasty standoff. The purpose of the CMP is to apply additional tools for curating graves under these circumstances. The families affiliated with the graves attach spiritual and sentimental value to the graves. They have accepted that the damage was inadvertent and accidental because the graves were concealed by summer grass. The have expressed support for the rehabilitation plan.

## 4. LOCATION AND ENVIRONMENTAL SETTING

Tsakane is a high density township in the Ekurhuleni Metro; historically it is part of Brakpan. The township is situated on the undulating plains of the Highveld with altitude ranging from 1600m to 1800m above mean sea level. Drainage trends south into the Vaal River; there are several channels in the broader area flanked by wetlands.

On the west side of the junction of the Heidelberg Rd and Geluksdal Rd there is one of the largest active mine tailings in Gauteng Province with mine waste channelled from several mines in the area. In the open areas the Savannah biome is represented by grasses, while trees are exotics with Eucalyptus predominating. The

common Highveld grasses are Themeda triandra, Heteropogon contortus, Elionurus musticus and a number of Eragrostis species. Most prominent forbs are of the families Asteraceae, Rubiaceae, Malvaceae, Lamiaceae and Fabaceae. Disturbance leads to an increase in the abundance of the grasses Hyparrhenia hirta and Eragrostis chloromelas (Marais and Burger, 2018, p15) (Figures 1-3).



Figure 1: View southwest to the junction of the Heidelberg Rd and Geluksdal Rd, and the Brakpan tailings dam in the background.



Figure 2: Graves marked by piles of stones partially disturbed by a grader.



Figure 3: Google Earth map shows the location of the burial ground on the western outskirts of Tsakane Township.

# 5. HISTORICAL CONTEXT

Since the graves are not very old, for the purpose of this CMP it is not necessary to outline the entire archaeological and historical sequence, but instead focus on the modern history of the area. Ekurhuleni is traditionally regarded as a part of the Johannesburg conurbation dating back to 1886 when gold was discovered at the Witwatersrand. This followed occupation of the region by the Voortrekkers from the 1830s. The new arrivals parcelled land for themselves creating the first commercial farms, especially after the singing of the Sand River convention in 1852. "Brakpan" was named in 1886, due to the very brackish water from a small pan on the Farm "Weltevreden". The impetus of industrial development was largely influenced by the discovery of gold at the Witwatersrand in 1886 and coal in 1888. The Brakpan Mines Company sunk its first two gold mine shafts in 1905. Brakpan was a suburb of Benoni from 1881 when it was established until 1919 when it severed and was granted the status of a municipality, and proclaimed as a town. The Rand Rebellion (or Rand Revolt) was an armed uprising of white miners in the Area in March 1922. The cause of the revolt was a drop in gold prices, the companies responding by reducing wages and preferring more African miners to skilled and supervisory positions at lowers rates, thus cutting costs. The strike started on 28 December 1921 and became an open

rebellion against the state. The workers revolted taking over Brakpan, Benoni and some suburbs of Johannesburg by force of arms. The violent strike continued for three months, involving bloody clashes between the miners and the military workers. On 9 March, Prime Minister Jan Smuts responded with mobilization orders for the Active Citizens Force and declared martial law. The rebellion was crushed by military force (20 000 troops, artillery, tanks and bomber aircraft) at the cost of over 200 lives.

With the coming to power of the Nationalist Party and the enactment of a raft of segregation laws (in particular the Group Areas Act (No 41/1950)) the urban land use and demographics of the area were transformed. Different townships were established and citizens separated according to the apartheid schema of racial differences. Forced removals began. While black Africans had lived in Brakpan Old Location (Ou Lokasie) in close proximity to whites they were forcibly and the final phase of the translocation was from 1974 to 1978 which marked the formal establishment of Tsakane c.15 km to the south. The Old Location was razed (Zwane 2019: 33). The Benoni and Brakpan Municipalities were incorporated into the Ekurhuleni metropolitan Municipality in 2001 (largely adapted from Gaigher 2018: pp21-23).

Tsakane, a Tsonga word meaning "be joyful", was so named by Mr Robert Thuketana, a teacher who became a businessman and civic leader (Zwane, Ibid: 36). There was so much resistance to the segregation project from prominent anti-apartheid activists such as David Bopape.

A number of gangster groups operated in Tsakane under the nose of the South African Police who were more concerned about political activists. In 1984, in the period after the Soweto Uprising, the Congress of South African students (COSAS) established in Tsakane under the leadership of Popo Mahlangu and later Eddie Maseko. One of the major highlights of this period was the struggle between residents and hostel dwellers to which COSAS and the South African police respectively took sides. The confrontation was the bloodiest in the history of Tsakane (Zwane 2019: 70-71).

Since 1978, the recycling of the mine tailings at Brakpan (the largest such dump in the Witwatersrand) has resulted in the recovery of significant residual quantities of gold and uranium. Over time gold mining in the area has decreased in importance.

#### 6. KEY STAKEHOLDERS AND CONTACT DETAILS

Stakeholder engagement is a critical process to integrate social concerns to environmental and cultural planning. The CMP should be a product of an inclusive and transparent stakeholder involvement process providing all relevant stakeholders (in particular local communities) an opportunity to contribute their opinions to the conservation management plan.

The public participation process was vigorous since it was necessary to locate those affiliated to the burial ground.

A notice was published on 18 October 2019 in the African Reporter Newspaper which has a local readership base (circulated in Springs, Brakpan and Tsakane).

Public notices were mounted at the Tsakane Customer Care Centre and the entrance to Faranani Multipurpose Centre also in Tsakane.

A podcast was recorded at a local radio station broadcasting from the Faranani Multipurpose Centre.

An unannounced visit was made to a steel manufacturing firm, RAM Trading, along Boland St. Mr Michiel Druce, who provided an important clues. He knew and phoned Mr Rudolf Hansen the present owner of the Farm Withoek 388 paving the way for a meeting thereafter.

Meeting with the Ward Councillor Mr Desmond Buitendacht and a civic leader, Mr Ernest Hendrick.

The following is a list of the key stakeholders:

Table 1: List of key stakeholders.

NAME	ORGANISATION	POSTAL ADDRESS	CONTACT DETAILS
Ms Annlin Matabane	SAHRA BGG	Office 101, 1st floor, Sancardia	Tel: 012 941 4964
		Mall, 541 Madiba Street	
		Pretoria	
Ms Teboho	The PHRAG	33 Rissik St, Marshalltown,	Tebogo.molokomme@gauteng.
Molokomme		Johannesburg, 2107	gov.za
			Office: 011 3552545
			Cell: 0729320866
Ms Sithembile	Ekurhuleni Metro		sithembile.pasiya@ekurhuleni.g
Pasiya			ov.za
Mr Hendrick Boya	Benoni Museum	60 Elston Ave, Benoni, 1500	Cell: 083 332 2795
			Hendrick.Boya@ekurhuleni.gov.
			<u>za</u>
Mr L. V. Mkhonza	Brakpan Museum Non-Profit Company	22 Naboom Cres, Dalpark Ext	Cell: 072 342 5347
	(NPC)	6, <b>Brakpan</b> , Gauteng, 1541	lv.mkhonza@webmail.co.za
Mr Butana Seaga	Family Rep	6734 Hlakwana St Tsakane	082 970 4747
Mr Petrus Makalime	Family Rep	6734 Hlakwana St Tsakane	083 475 1199

#### 7. LEGAL CONTEXT AND MANAGEMENT CONTEXT

#### 7.1. The statutes

Various pieces of legislation and policies intersect on the protection of heritage resources.

- In Section 3 of the National Heritage Resources Act (No 25 of 1999
  heritage is defined under the rubric of National Estate, and examples of
  commonly encountered typologies of heritage resources are given. Section
  3(3) outlines criteria upon which heritage value is ascribed. This Section is
  useful as a field checklist for the identification of heritage resources.
- Section 34 provides automatic protection for buildings and structures more than 60 years old until it can be proven that they do not have heritage value: No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.
- Section 35 prohibits the destruction of archaeological and palaeontological resources without an approval permit from a heritage authority.
- Section 38 of the National Heritage Resources Act is the foundation for the heritage impact assessments that have been conducted on the Farm Diamond 631.
  - (i) Section 36 of the NHRA provides for the protection of certain graves and burial grounds. Graves are generally classified under the following categories:
  - (ii) Graves younger than 60 years;
  - (iii) Graves older than 60 years, but younger than 100 years;
  - (iv) Graves older than 100 years; and
  - (v) Graves of victims of conflict
  - (vi) Graves of individuals of royal descent
  - (vii) Graves that have been specified as important by the Ministers of Arts and Culture.

- Section 31 of the Constitution of the Republic of South Africa Act (No 108
  /1996) provides guarantees for the rights of cultural, religious and linguistic
  communities.
- Section 2(2) of the National Environmental Management Act (No 107/ 1998)
  state principles of sustainable environmental management as they relate to the
  welfare of communities regarding their physical psychological, developmental,
  cultural and social interests.

Public sensibilities about the sanctity of graves and burial grounds renders public consultation critical to the conservation management planning process.

# 7.2. Management Context

The land on which of the graves are situated is property of the City of Ekurhuleni.

#### 8. THE PAST AND PRESENT USES OF THE HERITAGE

Part of the graveyard falls within a road servitude of Geluksdal Rd which handles substantial volume of vehicle traffic into and out of Tsakane Township. Previously it was part of the farm Withoek 388. This farm is believed to be one of the land parcels given to pioneer settlers in the 19<sup>th</sup> century.

# 9. STATE OF CONSERVATION OF THE GRAVES

SITE NO	COORDINATES	5	PERIOD
TSK01	26°20'21.57"S	28°20'28.90"E	20 <sup>th</sup> Century





**DESCRIPTION**: Burial ground situated at the intersection of Heidelberg Rd and Geluksdal Rd on the outskirts of Tsakane Township. One grave with concrete rim and headstone damaged. 10 graves reported. Shallow earth moving machine around the graves

HERITAGE SIGNIFICANCE		NCE	Section 36 of NHRA/ Graves are held sacred
STATE	OF	The graves were superficially damaged by a grader with	
CONSERVATION the impact		the impact	limited to the grave markers consisting of piles
		of stones (cairns) and in at least one case a rectangular	

	concrete rim and headstone. The stripping excavations	
	were not deep and no human bones were exposed.	
MITIGATION	Rehabilitation of the graves including installation of a	
	memorial stone and construction of protective perimeter	
	fencing.	

## **10.SWOT ANALYSIS**

STRENGTHS	OPPORTUNITIES	
SAHRA BGG supports the planned	Statutory protection of the graves	
rehabilitation of the burial ground and has		
recommended that a CMP be prepared		
The City of Ekurhuleni as both the	Opportunity for mutually peaceful	
landowner and developer have expressed	engagement with families affiliated with	
commitment to rehabilitate and protect the	graves or descendants of the deceased.	
burial ground.		
WEAKNESSES	THREATS	
-	The burial is situated close to the junction of	
	busy roads and a portion falls within the	
	servitude of the Geluksdal Rd.	

## 11. GUIDING PRINCIPLES

Principles of conservation are derived from the Burra Charter:

- (i) Conservation is based on a respect for the existing *fabric*, *use*, associations and *meanings*. It requires a cautious approach of changing as much as necessary but as little as possible (Article 3.1).
- (ii) Changes which reduce *cultural significance* should be reversible, and be reversed when circumstances permit (Article 15.2).

This CMP is a management tool that presents an approach, principles and actions for the sustainable use and conservation of selected heritage resources on the farm Diamond 631 and the sum of tangible and intangible heritage it contains. The plan integrates heritage into the proposed mining development. The CMP identifies and prioritises management responsibilities and imperatives needed for proper

management of the heritage resources. A CMP should conform to the following basic principles:

- Effectiveness the CMP should ensure realisation of the objective;
- Functionality the CMP should be workable; and
- Realism the CMP should be achievable and implementable.

#### 12. VISITOR MANAGEMENT

Visitations from members of affiliated families or descendants of the deceased will be allowed.

# 13. OBJECTIVES, STRATEGIES AND ACTION PLANS TO COVER: SITE MANAGEMENT, PRESENTATION, INTERPRETATION, SAFETY, RESEARCH AND EDUCATION, MARKETING AND CONSERVATION

# 13.1. Strategic Objectives of the CMP

The following are Strategic Objectives of the Conservation Management Plan:

- **SO 1:** Implementing the Rehabilitation Plan for the graves.
- **SO 2:** Encouraging collaboration among stakeholders to protect the burial ground.
- **SO 3.** The Strategic Objectives of the CMP and the Action Programmes must be incorporated into the Environmental Management Programme (EMPr).

## 13.2. Key Actions

## 13.2.1. Rehabilitation of the burial ground

Architectural plans of a proposed protective perimeter fencing have been drawn and approved by the affected families and the City of Ekurhuleni (Figure 4-5).



Figure 4: Proposed boundaries of the burial ground along which a perimeter fence will be constructed. There is amble provision for a buffer on the west, north and east sides of the propsed perimeter.

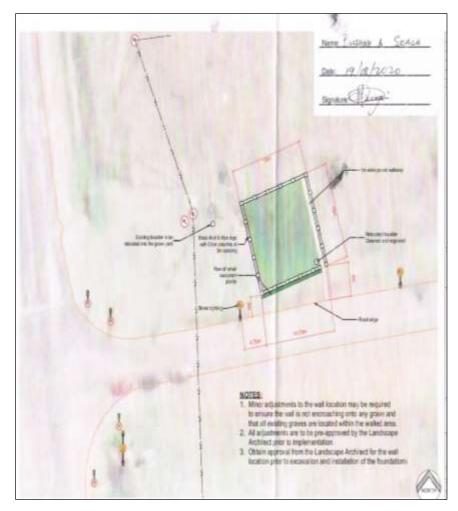


Figure 5: Layout plan of the proposed installations: Perimeter fencing, a memorial stone placed near the entrance to the enclosure, and a paved walkway along the eastern perimeter.

# 13.2.2. Monitoring

The rehabilitation of the burial ground based on the approved architectural drawings will be monitored by the Environmental Control Officer. The Environmental Control officer will also be responsible for routine monitoring during physical works for the road improvements.

#### 14. A SYSTEM WHEREBY APPROVALS FOR CHANGES ARE OBTAINED

There is no amble buffer space available on the side facing Geluksdal Rd. On the three sides facing west, north and east a 100m servitude can be set aside. But noting that the graves are on urban land with a high utility value, the City of Ekurhuleni might have reservations with a mandatory 100m buffer on the north and east sides of the graves which face open unutilised land. If in the future the COE will use the buffer area for other activities, permission must be obtained from SAHRA BGG.

#### 15. MONITORING PROGRAMME

A Monitoring, Evaluation, Learning and Intervention (MELI) tool should be established for the CMP:

Monitoring is the action of determining where implementation of the Action Plan stands. It is the ongoing, systematic collection of data to provide management and the main stakeholders with a good indication of the progress in terms of the Action Plan.

Evaluation informs the project manager and stakeholders of the degree of effectiveness in terms of outcomes and impacts of the activities. Evaluation must also assess unplanned outcomes and impacts for which established baseline values may not exist.

Learning refers to continuous learning from, and the insights gained from the results of the monitoring and evaluation. Intervention is the evidence-based action on the Monitoring, Evaluation and Learning that must be taken to overcome obstacles or challenges faced during the implementation of the CMP.

A monitoring programme is a watching brief for threats anticipated to arise from the proposed activities. Monitoring is the responsibility of the Environmental Control Officer (ECO) who will undergo short training in heritage monitoring. When the proposed road improvements commence, a heritage expert will be employed to conduct inspections at reasonable times and to submit a monitoring report to SAHRA or the provincial heritage resources authority.

#### 15.1. Identification of threats

The burial is situated close to the junction of busy roads and a portion falls within the servitude of the Geluksdal Rd.

# 15.2. Mitigation Measures

(i) A 100m buffer zone will be applied on the west, north and east side of the burial ground.

# 15.3. Protocols of Monitoring

- (i) A monitor should be a suitably qualified and experienced heritage expert.
- (ii) Monitoring/inspection visits must be guided by specific objectives.
- (iii) Although monitoring visits may be conducted without an appointment it is recommended that prior notice is served to the Site Manager and /or ECO.
- (iv) All inspection visits must be documented and a report lodged with SAHRA BGG.
- (v) The ECO will be required to send a report of the condition of the site to the heritage authority once every 12 months during the proposed road works.
- (vi) SAHRA may undertake occasional inspection visits and assess compliance with the commitments made in Conservation Management Plan.
- (vii) If problems have been encountered with the implementation of the CMP, the monitoring heritage specialists will advise in writing on appropriate remedial actions.
- (viii) The issuing of a "cease works order" is the discretion of SAHRA BGG or provincial heritage resources authority based on observations of the monitoring archaeologist.

#### 16. REFERENCES

**Gaigher, S. 2018.** Heritage Impact Assessment for the proposed Residential Township, Leachville Extension 2, situated on Portion 148 of the Farm Rietfontein 115IR, the Ekurhuleni Metro Municipality, Gauteng Province

**Gaigher, S. 2015.** Heritage Impact Assessment for the Proposed Vlakfontein Township Development. G & A Heritage.

**Gaigher. S. 2007.** Cultural heritage resources impact assessment of the farm Vlaklaagte 161 Tsakane Benoni Gauteng

Marais, V and M Burger. 2018. Draft scoping report for the proposed Minnebron x 1 Mixed Use Development on Portion 3 of the Farm Witpoortjie 117 I.R. and on the southern, undeveloped part of Van Eck Park x 2 (portions 524-525), Brakpan, Ekurhuleni.

Matenga, E. 2019. Tsakane Road Infrastructure Improvement, Ekurhuleni Metro Municipality, Gauteng Province: Investigation of graves at the Junction of the Heidelberg Rd (R23) and Geluksdal Rd (principal entrance to Tsakane Township Rasmussen, K. 1978. *Migrant Kingdom: Mzilikazi's Ndebele in South Africa*. University of Michigan

**SAHRA. 2014**. Guidelines for Conservation Management Plans for Heritage Sites (Updated 2014).

Zwane, S. 2019. *Tsakane the beginning: Tracing the origins of Tsakane Township*. I-Africa Theatre Education.

# **Legislation and policy documents**

Republic of South Africa. National Heritage Resources Act (No 25/1999).

Republic of South Africa. National Environmental Management Act (No 107/1998).