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EOH COASTAL & ENVIRONMENTAL SERVICES: PROPOSED IMPROVEMENT OF NATIONAL ROUTE R510 SECTION 2 FROM KM 6.3 AT BIERSPRUIT BRIDGE TO KM 33.4 NEAR THABAZIMBI, THABAZIMBI LOCAL MUNICIPALITY, WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

Archaeological Impact Assessment

A 3D rendering of a globe with water splashing over it, symbolizing sustainability and environmental impact. The globe is partially obscured by a large, faint infinity symbol.

Innovation in Sustainability



Prepared for: EOH Coastal & Environmental Services

Prepared by: Exigo Sustainability

ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) FOR THE IMPROVEMENT OF NATIONAL ROUTE R510 SECTION 2 FROM KM 6.3 AT BIERSPRUIT BRIDGE TO KM 33.4 NEAR THABAZIMBI, THABAZIMBI LOCAL MUNICIPALITY, WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

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DECLARATION

I, Nelius Le Roux Kruger, declare that –

- I act as the independent specialist;
- I am conducting any work and activity relating to the proposed R510 National Route Upgrade Project in an objective manner, even if this results in views and findings that are not favourable to the client;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have the required expertise in conducting the specialist report and I will comply with legislation, including the relevant Heritage Legislation (National Heritage Resources Act no. 25 of 1999, Human Tissue Act 65 of 1983 as amended, Removal of Graves and Dead Bodies Ordinance no. 7 of 1925, Excavations Ordinance no. 12 of 1980), the Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment (SAHRA and the CRM section of ASAPA), regulations and any guidelines that have relevance to the proposed activity;
- I have not, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this declaration are true and correct.



Signature of specialist
Company: Exigo Sustainability
Date: 5 September 2017

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EXECUTIVE SUMMARY

This report details the results of an Archaeological Impact Assessment (AIA) study between Northam and Thabazimbi in the Limpopo Province, subject to an Environmental Basic Assessment (BA) process for the proposed R510 National Route Upgrade Project in the Waterberg District, Limpopo Province. The total length of the project is **27km** of single carriageway road with an existing surfaced width of 7m. Included in the project are five river bridges and two roads-over-rail bridges that must be widened, as well as the utilization of a borrow pit of **1ha**. The report includes background information on the area’s archaeology, its representation in Southern Africa, and the history of the larger area under investigation, survey methodology and results as well as heritage legislation and conservation policies. A copy of the report will be supplied to the Limpopo Provincial Heritage Resources Authority (Limpopo-PHRA) and recommendations contained in this document will be reviewed.

Project Title	Improvement of National Route R510 Section 2 from km 6.3 at Bierspruit bridge to km 33.4 near Thabazimbi (R510 National Route Upgrade Project)
Project Location	S24.68943° E27.32282°
1:50 000 Map Sheet	2427CB , 2427 CD
Farm Portion / Parcel	Various Farm Portions south of Thabazimbi.
Magisterial District / Municipal Area	Waterberg District
Province	Limpopo Province

A large number of archaeological and historical studies have been conducted in Waterberg and around Thabazimbi, most of which infer a varied and rich heritage landscape. The literature shows evidence of an archaeological heritage that spans from the Early Stone Age, Middle Stone Age to the Later- Stone, as well as evidence of pastoralism and Iron Age farmers. Specifically, Thabazimbi holds a significant Farmer and Colonial horizon with remnants of several of the Batswana tribes tracing their origins back to the Highveld and Waterberg region during the 18th century and 19th century. In terms of heritage resources, the landscape around the project area is primarily well known for the occurrence of Iron Age Farmer period and Historical Period occurrences. However, the proposed R510 National Route Upgrade Project footprint is situated along a road servitude that has been transformed as the road was constructed and modified over many years. As a consequence, much of the direct surroundings have sterilised the area of potential heritage resources - especially those dating to pre-Colonial and prehistoric times and two sites of heritage potential were identified in the project area. The following recommendations are made based on general observations in the project area and cognisant of the potential seniority of heritage remains:

- A Palaeontological Desktop Assessment for the project has been commissioned but as a general rule, any fossil remains such as fossil fish, reptiles or petrified wood exposed during construction should be carefully safeguarded and the relevant heritage resources authority (Limpopo-PHRA) should be notified immediately so that the appropriate action can be taken by a professional palaeontologist.
- Three possible Historical Period structures (**Site EXIGO-R510UG-HP01**) are of medium-low significance and these features, which were probably former railway station buildings, are currently used as dwellings. The sites are located in proximity of the project area (>50m) and it is recommended that

the sites and any activities in its surrounds be monitored in order to avoid impact on the site or the destruction of previously undetected heritage remains. The necessary destruction permits should be obtained from the relevant Heritage Resources Authorities prior to the possible impact or destruction of the features.

- A cemetery identified within close proximity (approximately 30m) of the road upgrade alignments (**Site EXIGO-R510UG-BP01**) is of high significance but according to design plans, no work will be done outside of the existing road reserve, where it is assumed that the current proximity will remain preserved. SAHRA requires a 50m conservation buffer for all burials as a primary measure but the relaxation of this measure could be considered considering the existing proximity between the cemetery and the road reserve. As such, a conservation buffer of at least 20m should be maintained, subject to approval from the relevant Heritage Body. In addition, it is recommended that the cemetery be fenced off and that access control be applied during all phases of construction. The fence should be placed at a distance of at least 10m from the closest graves. The developer should carefully liaise with the heritage specialist and SAHRA with regards to the management and monitoring of any human grave or cemetery in order to detect and manage negative impact on the sites. **Should impact on any human burial prove inevitable, full grave relocations are recommended for these burial grounds. This measure should be undertaken by a qualified archaeologist, and in accordance with relevant legislation, permitting, statutory permissions and subject to any local and regional provisions and laws and by-laws pertaining to human remains. A full social consultation process should occur in conjunction with the mitigation of cemeteries and burials.**
- Considering the localised nature of heritage remains, the general monitoring of the development progress by an informed ECO is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately

Heritage resources occur in close proximity of alignments proposed for the R510 National Route Upgrade Project and potential peripheral impact on these heritage receptors might occur. However, this impact can be mitigated by means of avoidance and site monitoring during development. In the opinion of the author of this Archaeological Impact Assessment Report, the proposed road upgrade proceed from a culture resources management perspective, provided that mitigation measures are implemented where applicable, and provided that no subsurface heritage remains are encountered during construction.

R510 National Route Upgrade Project heritage sites locations

Site Code	Short Description	Coordinate S E	Mitigation Action
Exigo-R510UG-HP01	Possible Historical Period structures	S24.76694° E27.32462°	Avoidance, 50m conservation buffer, site monitoring. Destruction permitting if impacted on.
Exigo-R510UG-BP01	Burial Site	S24.62402° E27.38809°	Avoidance to avoid the cemetery, strict 50m conservation buffer, fence burial place and apply access control, frequent site monitoring, site management plan implementation. Grave Relocation Alternative: Relocation of burials and documentation of site, full social consultation with affected parties, possible

			<p>conservation management and protection measures. Subject to authorisations and relevant permitting from heritage authorities and affected parties.</p>
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It is essential that cognisance be taken of the larger archaeological landscape of the Limpopo Province and the Waterberg region in order to avoid the destruction of previously undetected heritage sites. Water sources such as pans, drainage lines and rivers should also be regarded as potentially sensitive in terms of possible Stone Age deposits. The possible existence of Colonial Period resources deriving from the area’s more recent history should also be considered. Should any previously undetected heritage resources be exposed or uncovered during construction phases of the proposed project, these should immediately be reported to SAHRA.

Since the intrinsic heritage and social value of graves and cemeteries are highly significant, these resources require special management measures. Should human remains be discovered at any stage, these should be reported to the Heritage Specialist and relevant authorities (SAHRA) and development activities should be suspended until the site has been inspected by the Specialist. The Specialist will advise on further management actions and possible relocation of human remains in accordance with the Human Tissue Act (Act 65 of 1983 as amended), the Removal of Graves and Dead Bodies Ordinance (Ordinance no. 7 of 1925), the National Heritage Resources Act (Act no. 25 of 1999) and any local and regional provisions, laws and by-laws pertaining to human remains. A full social consultation process should occur in conjunction with the mitigation of cemeteries and burials.

This report details the methodology, limitations and recommendations relevant to these heritage areas, as well as areas of proposed development. It should be noted that recommendations and possible mitigation measures are valid for the duration of the development process, and mitigation measures might have to be implemented on additional features of heritage importance not detected during this Phase 1 assessment (e.g. uncovered during the construction process).

NOTATIONS AND TERMS/TERMINOLOGY

Absolute dating: Absolute dating provides specific dates or range of dates expressed in years.

Archaeological record: The archaeological record minimally includes all the material remains documented by archaeologists. More comprehensive definitions also include the record of culture history and everything written about the past by archaeologists.

Artefact: Entities whose characteristics result or partially result from human activity. The shape and other characteristics of the artefact are not altered by removal of the surroundings in which they are discovered. In the Southern African context examples of artefacts include potsherds, iron objects, stone tools, beads and hut remains.

Assemblage: A group of artefacts recurring together at a particular time and place, and representing the sum of human activities.

Context: An artefact's context usually consists of its immediate *matrix*, its *provenience* and its *association* with other artefacts. When found in *primary context*, the original artefact or structure was undisturbed by natural or human factors until excavation and if in *secondary context*, disturbance or displacement by later ecological action or human activities occurred.

Cultural Heritage Resource: The broad generic term *Cultural Heritage Resources* refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of palaeontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

Cultural landscape: A cultural landscape refers to a distinctive geographic area with cultural significance.

Cultural Resource Management (CRM): A system of measures for safeguarding the archaeological heritage of a given area, generally applied within the framework of legislation designed to safeguard the past.

Feature: Non-portable artefacts, in other words artefacts that cannot be removed from their surroundings without destroying or altering their original form. Hearths, roads, and storage pits are examples of archaeological features

Lithic: Stone tools or waste from stone tool manufacturing found on archaeological sites.

Matrix: The material in which an artefact is situated (sediments such as sand, ashy soil, mud, water, etcetera). The matrix may be of natural origin or human-made.

Midden: Refuse that accumulates in a concentrated heap.

Microlith: A small stone tool, typically knapped of flint or chert, usually about three centimetres long or less.

Monolith: A geological feature such as a large rock, consisting of a single massive stone or rock, or a single piece of rock placed as, or within, a monument or site.

Phase 1 CRM Assessment: An Impact Assessment which identifies archaeological and heritage sites, assesses their significance and comments on the impact of a given development on the sites. Recommendations for site mitigation or conservation are also made during this phase.

Phase 2 CRM Study: In-depth studies which could include major archaeological excavations, detailed site surveys and mapping / plans of sites, including historical / architectural structures and features. Alternatively, the sampling of sites by collecting material, small test pit excavations or auger sampling is required. Mitigation / Rescue involves planning the protection of significant sites or sampling through excavation or collection (in terms of a permit) at sites that may be lost as a result of a given development.

Phase 3 CRM Measure: A Heritage Site Management Plan (for heritage conservation), is required in rare cases where the site is so important that development will not be allowed and sometimes developers are encouraged to enhance the value of the sites retained on their properties with appropriate interpretive material or displays.

Provenience: Provenience is the three-dimensional (horizontal and vertical) position in which artefacts are found. Fundamental to ascertaining the provenience of an artefact is *association*, the co-occurrence of an artefact with other archaeological remains; and *superposition*, the principle whereby artefacts in lower levels of a matrix were deposited before the artefacts found in the layers above them, and are therefore older.

Random Sampling: A probabilistic sampling strategy whereby randomly selected sample blocks in an area are surveyed. These are fixed by drawing coordinates of the sample blocks from a table of random numbers.

Site (Archaeological): A distinct spatial clustering of artefacts, features, structures, and organic and environmental remains, as the residue of

human activity. These include surface sites, caves and rock shelters, larger open-air sites, sealed sites (deposits) and river deposits. Common functions of archaeological sites include living or habitation sites, kill sites, ceremonial sites, burial sites, trading, quarry, and art sites,

Stratigraphy: This principle examines and describes the observable layers of sediments and the arrangement of strata in deposits

Systematic Sampling: A probabilistic sampling strategy whereby a grid of sample blocks is set up over the survey area and each of these blocks is equally spaced and searched.

LIST OF ABBREVIATIONS

Abbreviation	Description
ASAPA	Association for South African Professional Archaeologists
AIA	Archaeological Impact Assessment
BP	Before Present
BCE	Before Common Era
CRM	Culture Resources Management
ECO	Environmental Control Officer
EIA	Early Iron Age (also Early Farmer Period)
EIA	Environmental Impact Assessment
EFP	Early Farmer Period (also Early Iron Age)
ESA	Earlier Stone Age
GIS	Geographic Information Systems
HIA	Heritage Impact Assessment
ICOMOS	International Council on Monuments and Sites
K2/Map	K2/Mapungubwe Period
LFP	Later Farmer Period (also Later Iron Age)
LIA	Later Iron Age (also Later Farmer Period)
LSA	Later Stone Age
MIA	Middle Iron Age (also Early later Farmer Period)
MSA	Middle Stone Age
NHRA	National Heritage Resources Act No.25 of 1999, Section 35
PFS	Pre-Feasibility Study
PHRA	Provincial Heritage Resources Authority
SAHRA	South African Heritage Resources Association
YCE	Years before Common Era (Present)

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1 BACKGROUND

1.1 Scope and Motivation

Exigo Sustainability was commissioned by EOH Coastal & Environmental Services for an Archaeological Impact Assessment (AIA) study subject to an Environmental Impact Assessment (EIA) process for the R510 National Route Upgrade Project in the Waterberg District, Limpopo Province. The rationale of this AIA is to determine the presence of heritage resources such as archaeological and historical sites and features, graves and places of religious and cultural significance in previously unstudied areas; to consider the impact of the proposed project on such heritage resources, and to submit appropriate recommendations with regard to the cultural resources management measures that may be required at affected sites / features.

1.2 Project Direction

Exigo Sustainability's expertise ensures that all projects be conducted to the highest international ethical and professional standards. As archaeological specialist for Exigo Sustainability, Mr Nelius Kruger acted as field director for the project; responsible for the assimilation of all information, the compilation of the final consolidated AIA report and recommendations in terms of heritage resources on the demarcated project areas. Mr Kruger is an accredited archaeologist and Culture Resources Management (CRM) practitioner with the Association of South African Professional Archaeologists (ASAPA), a member of the Society for Africanist Archaeologists (SAFA) and the Pan African Archaeological Association (PAA) as well as a Master's Degree candidate in archaeology at the University of Pretoria.

1.3 Project Brief

The proposed R510 National Route Upgrade Project is located between Northam and Thabazimbi in the Limpopo Province. The project starts at km 6.3 just before the Bierspruit Bridge and ends at km 33.4 at the informal Mine intersection. The total length of the project is 27.1 km of single carriageway road with an existing surfaced width of 7m. The carriageway is to be widened to accommodate passing lanes, where required, thus resulting in a carriageway that varies from 13.4 m to 16.8 m surfaced width, with two to four 3.7 m lanes and 3.0 m or 1.0 m surfaced shoulders respectively. Included in the project are four river bridges and two roads over rail bridges that must be widened to accommodate the road cross section improvement.

The major aspects of this project include the following:

- General widening of the existing road cross section to a minimum width of 13.4 m, comprising 2 x 3.7 m wide traffic lanes and 2 x 3.0 m wide surfaced shoulders;
- Provision of 11.6km (6.4 km northbound and 5.2 km southbound) passing lanes with 3.0 m paved shoulders be provided;
- Exclusive turning lanes are provided at the future brickyard access via R510 at chainage km12.4;
- Strengthening of the existing pavement structure;
- The existing horizontal alignment will be maintained;
- Vertical realignment of the R510 to improve the vertical clearance of the overpass bridge located at km7.182;
- Upgrade of the R510/ Zwartkop intersection to include a dedicated right turning lane and refuge islands;
- Upgrade of the R510/R511 intersection to include a dedicated right turning lane and refuge islands;
- Structures and major culverts:
- All rivers structures will be widened between 0.325 m – 1.825 m on each side respectively;

- C013 Bierspruit 6 where the inlet and outlet structures, (that have failed structurally) need to be replaced and the culvert will be lengthened at the same time;
- The bridges will receive new New Jersey barriers and will be rehabilitated;
- All of the major culverts will receive new guardrails on top and will be rehabilitated;
- The B3663 Rail over Road Bridge at km7.180 will receive pier protection in the form of New Jersey Barriers;
- All minor culverts that are not able to pass the required flow for a Class 3 road be upgraded;
- All the culverts affected by provision of the 13.4 m – 16.8 m wide cross section be lengthened accordingly; and
- Replacement of side drains due to the new vertical alignment.

This preferred stockpile (Borrow pit Q3) comprises a surface area of 1ha and is situated in an abandoned Andalusite mine area on farm Grootfontein 352/1. Q3 is situated at km23.0 approximately 150m north of the R510. It comprises the overburden at the nearby mine pit, which consists of sandy gravel. The gravel clasts comprise mostly of banded ironstone. No borrowing is foreseen, but large quantities of gravelly soils are present in the area. Access to this source can easily be obtained through the existing dirt road immediately off the R510. The security fencing may have to be upgraded in order to allow for access control, and moderate grading of the dirt roads will be required to accommodate heavier vehicles, but an existing access point is in place and can be used to reach this source.

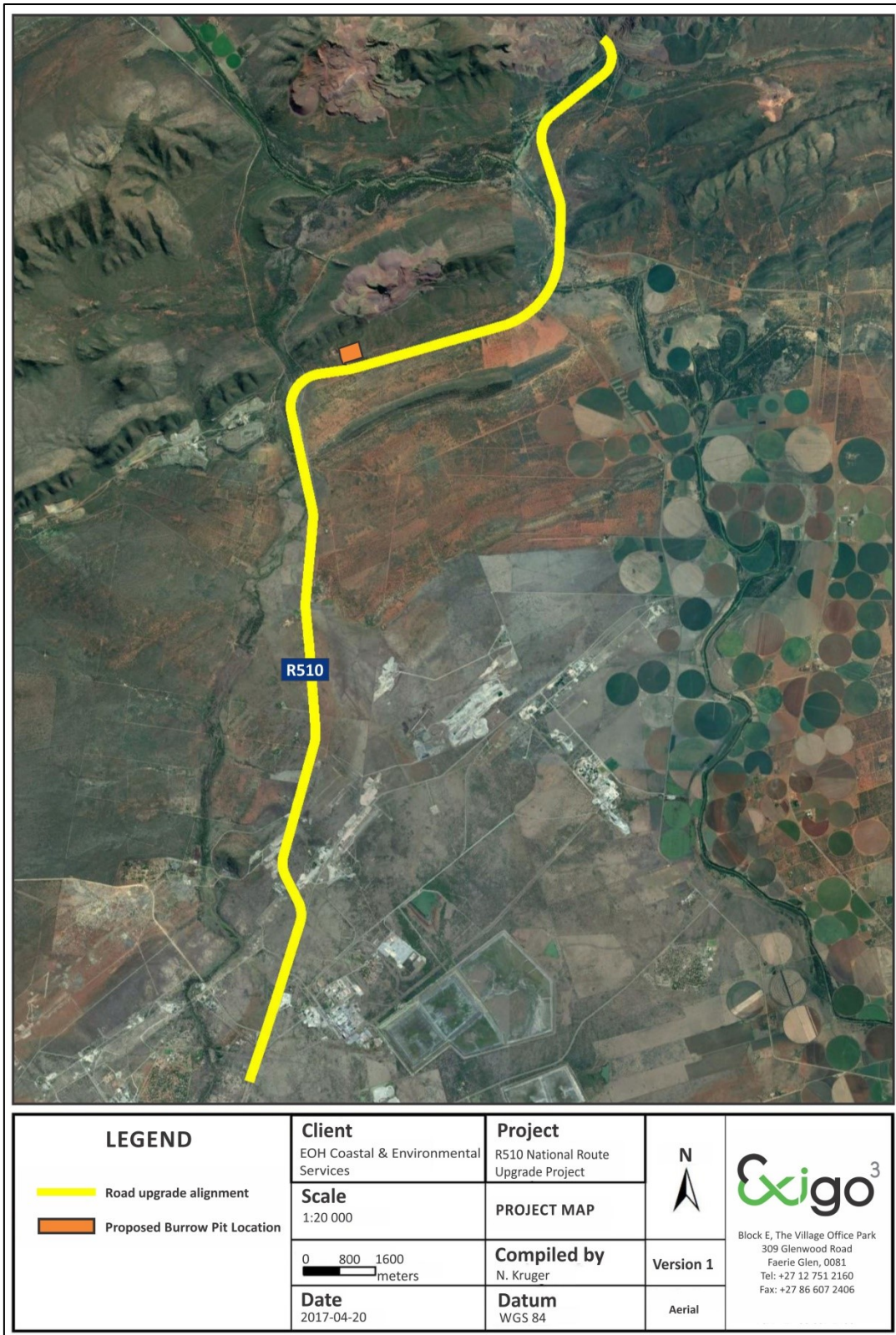


Figure 1-1: Aerial representation of the R510 National Route Upgrade Project location and extent.

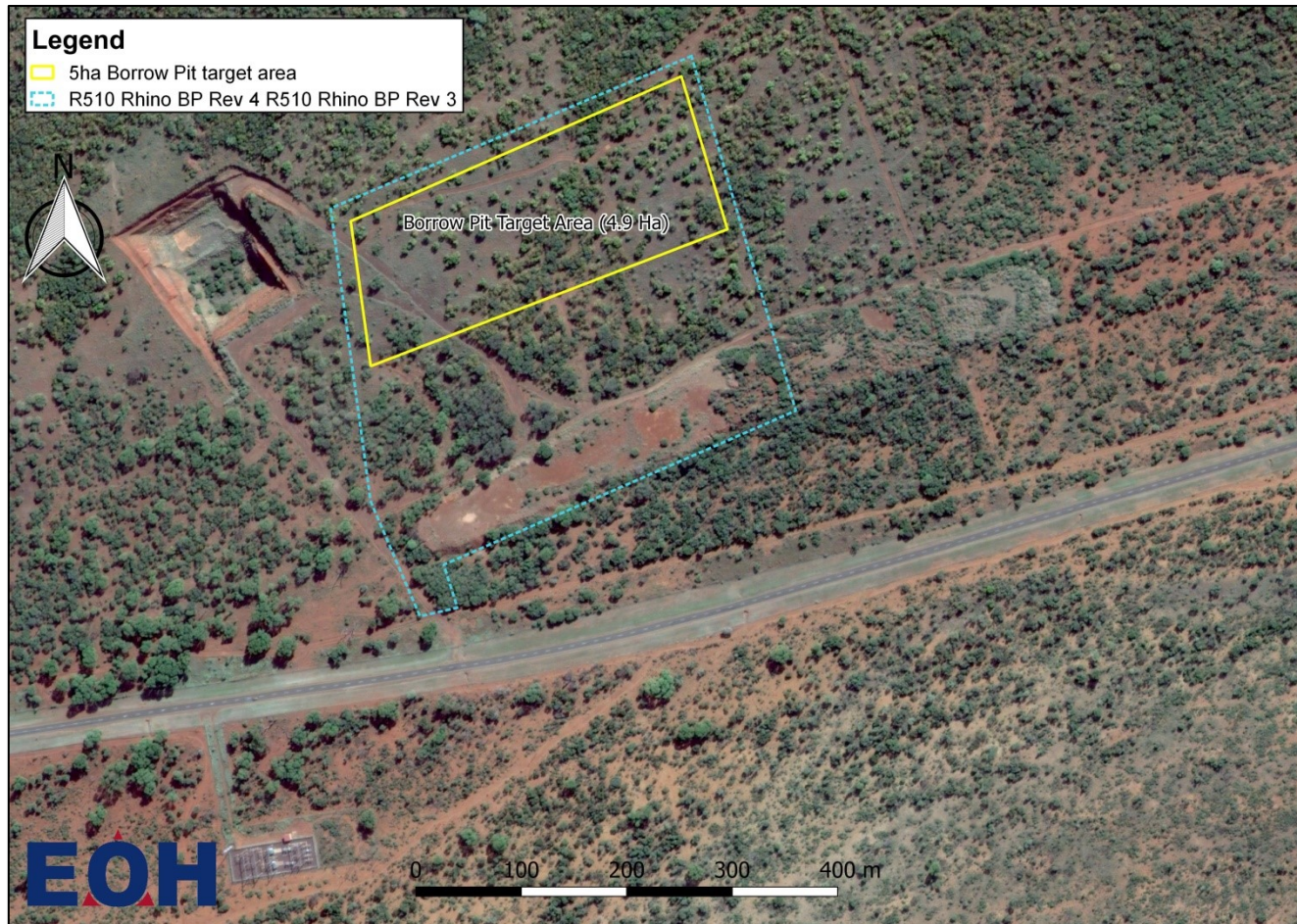


Figure 1-2: Aerial representation detailing the location of the preferred borrow pit (Q3) for the R510 National Route Upgrade Project.

1.4 Terms of Reference

Heritage specialist input into the Environmental Impact Assessment (EIA) process is essential to ensure that, through the management of change, developments still conserve our heritage resources. Heritage specialist input in EIA processes can play a positive role in the development process by enriching an understanding of the past and its contribution to the present. It is also a legal requirement for certain development categories which may have an impact on heritage resources (Refer to Section 2.5.2).

Thus, EIAs should always include an assessment of heritage resources. The heritage component of the EIA is provided for in the **National Environmental Management Act, (Act 107 of 1998)** and endorsed by section 38 of the **National Heritage Resources Act (NHRA - Act 25 of 1999)**. In addition, the NHRA protects all structures and features older than 60 years, archaeological sites and material and graves as well as burial sites. The objective of this legislation is to ensure that developers implement measures to limit the potentially negative effects that the development could have on heritage resources. Based hereon, this project functioned according to the following **terms of reference** for heritage specialist input:

- *Provide a detailed description of all archaeological artefacts, structures (including graves) and settlements which may be affected, if any.*
- *Assess the nature and degree of significance of such resources within the area.*
- *Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;*
- *Assess and rate any possible impact on the archaeological and historical remains within the area emanating from the proposed development activities.*
- *Propose possible heritage management measures provided that such action is necessitated by the development.*
- *Liaise and consult with the South African Heritage Resources Agency (SAHRA)*

1.5 CRM: Legislation, Conservation and Heritage Management

The broad generic term *Cultural Heritage Resources* refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of palaeontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

1.5.1 Legislation regarding archaeology and heritage sites

The South African Heritage Resources Agency (SAHRA) and its provincial offices aim to conserve and control the management, research, alteration and destruction of cultural resources of South Africa. It is therefore vitally important to adhere to heritage resource legislation at all times.

a. National Heritage Resources Act No 25 of 1999, section 35

According to the National Heritage Resources Act No 25 of 1999 (section 35) the following features are 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
- i. Objects, structures and sites of scientific or technological value.

In addition, 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. Archaeological and paleontological importance
- g. Graves and burial grounds
- h. Sites of significance relating to the history of slavery
- i. Movable objects (e.g. archaeological, paleontological, meteorites, geological specimens, military, ethnographic, books etc.)

With regards to activities and work on archaeological and heritage sites this Act states that:

“No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit by the relevant provincial heritage resources authority.” (34. [1] 1999:58)

and

“No person may, without a permit issued by the responsible heritage resources authority-

- (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*
- (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*
- (c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or*
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites. (35. [4] 1999:58).”*

and

“No person may, without a permit issued by SAHRA or a provincial heritage resources agency-

- (a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*
- (b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority;*
- (c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) and excavation equipment, or any equipment which assists in the detection or recovery of metals (36. [3] 1999:60).”*

b. Human Tissue Act of 1983 and Ordinance on the Removal of Graves and Dead Bodies of 1925

Graves and burial grounds are commonly divided into the following subsets:

- a. ancestral graves
- b. royal graves and graves of traditional leaders
- c. graves of victims of conflict
- d. graves designated by the Minister
- e. historical graves and cemeteries
- f. human remains

Graves 60 years or older are heritage resources and fall under the jurisdiction of both the National Heritage Resources Act and the Human Tissues Act of 1983. However, graves younger than 60 years are specifically protected by the Human Tissues Act (Act 65 of 1983) and Ordinance on Excavations (Ordinance no. 12 of 1980) as well as any local and regional provisions, laws and by-laws. Such burial places also fall under the jurisdiction of the National Department of Health and the Provincial Health Departments. Approval for the exhumation and re-burial must be obtained from the relevant Provincial MEC as well as the relevant local authorities.

c. National Heritage Resources Act No 25 of 1999, section 35

This act (Act 107 of 1998) 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.

1.5.2 Background to HIA and AIA Studies

South Africa’s unique and non-renewable archaeological and palaeontological heritage sites are ‘generally’ protected in terms of the National Heritage Resources Act (Act No 25 of 1999, section 35) and may not be disturbed at all without a permit from the relevant heritage resources authority. Heritage sites are frequently

threatened by development projects and both the environmental and heritage legislation require impact assessments (HIAs & AIAs) that identify all heritage resources in areas to be developed. Particularly, these assessments are required to make recommendations for protection or mitigation of the impact of the sites. HIAs and AIAs should be done by qualified professionals with adequate knowledge to (a) identify all heritage resources including archaeological and palaeontological sites that might occur in areas of developed and (b) make recommendations for protection or mitigation of the impact on the sites.

A detailed guideline of statutory terms and requirements is supplied in Addendum 1.

2 REGIONAL CONTEXT

2.1 Area Location

The study area is located on a number of farms and properties along the R510 between Bierspruit and Thabazimbi in the Thabazimbi Local Municipality, Waterberg District Municipality, Limpopo Province. The southern offset of the proposed project occurs 6.3km south of the Bierspruit Bridge and the route aligns 33.4km further south of Thabazimbi town.

The study area appears on 1:50 000 map sheets **2427CB** , **2427 CD** (see Figure 2-1). Key geographical points for the project are:

- **Southern Offset:** S24.81789° E27.31406°
- **Relative Midpoint:** S24.68943° E27.32282°
- **Northern Offset:** S24.61727° E27.38884°

2.2 Area Description: Receiving Environment

The study area lies within the Savanna biome which is the largest biome in Southern Africa. It is characterized by a grassy ground layer and a distinct upper layer of woody plants (trees and shrubs). Fire and grazing also keep the grassy layer dominant. The most recent classification of the area by Mucina & Rutherford shows that the site is classified as Dwaalboom Thornveld. The project area is characterised by slightly undulating to flat plains with major drainage channels bisecting the area. The topography across the site is slightly undulating.

2.3 Site Description

The proposed road upgrade route generally follows the R510 road servitude and as such, natural surroundings in the study area have largely been altered and disturbed, which might have compromised the presence of heritage remains. This preferred stockpile at Borrow pit Q3 comprises a surface area of 1ha in an abandoned Andalusite mine area on farm Grootfontein 352/1.

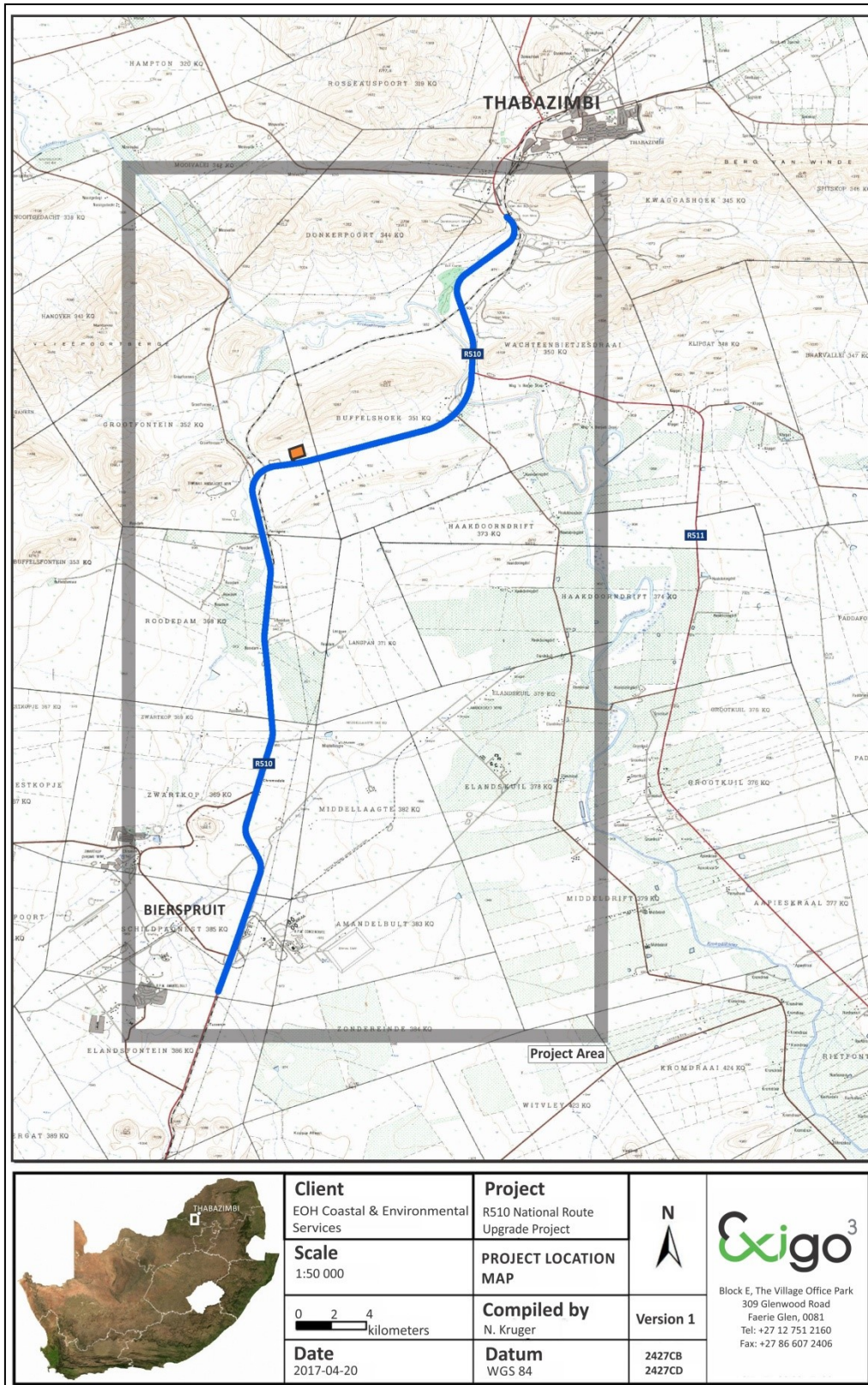


Figure 2-1: 1:50 00 Map representation of the location of the proposed R510 National Route Upgrade Project (sheet 2427CB/ 2427CD).



Figure 2-2: Aerial map providing a regional setting for the proposed R510 National Route Upgrade Project.

3 METHOD OF ENQUIRY

3.1 Sources of Information

Data from detailed desktop, aerial and field studies were employed in order to sample surface areas systematically and to ensure a high probability of heritage sites recording.

3.1.1 Desktop Study

The larger landscape of Waterberg has been well documented in terms of its archaeology and history. A desktop study was prepared in order to contextualize the proposed project within a larger historical milieu. Numerous academic papers and research articles supplied a historical context for the proposed project and archival sources, aerial photographs, historical maps and local histories were used to create a baseline of the landscape's heritage. In addition, the study drew on available unpublished Heritage Assessment reports to give a comprehensive representation of known sites in the study area. These included:

Hutten, M. 2013c. HIA for the proposed solar park development on the farm Aapieskruil near Koedoeskop, Limpopo Province. Compiled for: Jonk Begin Omgewingsdienste.

Fourie, W. 2012. Wachteenbietjesdraai 350 KQaAnd Kwaggashoek 345 KQ Heritage Impact Report on proposed mining activities of Project Phoenix. PGS Heritage Consultants

Fourie, W. 2014. Proposed Development of the Steenbokpan Extension 3 Township on the Remainder and Portions 1, 2, 3 and 4 of the Farm Grootdoorn 292 LQ, Portions 20, 22 and 25 of the Farm Theunispan 293 LQ and Portion 3 of the Farm Steenbokpan 295 LQ at Steenbokpan, Lephallale Local Municipality, Waterberg District, Limpopo Province. Client: Flexilor Properties (Pty) Ltd . PGS Heritage Consultants

Van Schalkwyk, J.A. 1994. A survey of archaeological and cultural historical resources in the Amandelbult mining lease area. Unpublished report 94KH03. Pretoria: National Cultural History Museum.

Van Schalkwyk, J.A. 2001. A survey of cultural resources in two development areas, Amandelbult, Northern Province. Unpublished report 2001KH13. Pretoria: National Cultural History Museum.

Van Schalkwyk, J.A. 2003. A survey of archaeological sites for the Amandelbult Platinum Mine Seismic exploration program. Unpublished report 2003KH16. Pretoria: National Cultural History Museum.

Van Schalkwyk, J.A. 2004. Heritage impact report for the Amandelbult electricity sub-transmission lines, Amandelbult Platinum Mine, Limpopo Province. Unpublished report 2004KH32. Pretoria: National Cultural History Museum.

Van Schalkwyk, J. 2007. Survey of heritage resources in the location of the proposed Merensky Mining Project, Amandelbult Section, Rustenburg Platinum Mine, Limpopo Province. Prepared For WSP Environmental.

Van Vollenhoven, A. July 2013. A Report on a Cultural Heritage Impact Assessment for the Continental Limestone Mine, close to Thabazimbi, Limpopo Province.

3.1.2 Aerial Representations and Survey

Aerial photography is employed to locate and study archaeological sites, particularly where larger scale area surveys are performed. This method was applied to assist the vehicular and foot site survey where depressions, variation in vegetation, soil marks and landmarks were examined. Specific attention was given to shadow sites (shadows of walls or earthworks which are visible early or late in the day), crop mark sites (crop mark sites are visible because disturbances beneath crops cause variations in their height, vigour and type) and soil marks (e.g. differently coloured or textured soil (soil marks) might indicate ploughed-out burial mounds). Attention was also given to moisture differences, as prolonged dampening of soil as a result of precipitation frequently occurs over walls or embankments. By superimposing high frequency aerial photographs with images generated with Google Earth, potential sensitive areas were subsequently identified, geo-referenced and transferred to a handheld GPS device. These areas served as referenced points from where further vehicular and pedestrian surveys were carried out. The aerial survey suggested that most of the surface areas demarcated for the proposed R510 National Route Upgrade Project might have been subjected to historical and more recent transformation and development.

3.1.3 Field Survey

Archaeological survey implies the systematic procedure of the identification of archaeological sites. An archaeological survey of the site subject to this study was conducted in April 2017. The process encompassed a field survey in accordance with standard archaeological practice by which heritage resources are observed and documented. In order to sample surface areas systematically and to ensure a high probability of site recording, the entire route and the site proposed for the Q3 burrow Pit was carefully inspected on foot and in a vehicle. GPS reference points identified during the aerial survey were also visited and random spot checks were made (see detail in previous section). Using a Garmin E-trex Legend GPS, the site was geo-referenced and photographed with a Canon 450D Digital camera. Real time aerial mapping and positioning by means of a hand-held tablet-based Google Earth application was also employed on site to investigate possible disturbed areas during the survey.

3.2 Limitations

3.2.1 Access

Since the proposed road upgrade route generally follows the R510 road servitude the study area is accessed directly via this road. Access control is not applied to the survey areas and no restrictions were encountered during the site visit in terms of access.

3.2.2 Visibility

The surrounding vegetation in the study area is mostly comprised out of mixed grasslands and scattered trees. The southern portions of the study area around Bierspruit is less densely vegetated in disturbed and transformed areas but northern portions of the study area near Thabazimbi are densely vegetated with grasses and Thornveld vegetation. Visibility proved to be a constraint in these areas. As such, the general visibility at the time of the AIA survey (April 2017) therefore ranged between moderate visibility in areas to the south, and moderate to low visibility in the central and northern portions of the study area (see Figures 3-1 to 3-11). In single cases during the survey sub-surface inspection was possible. Where applied, this revealed no archaeological deposits.



Figure 3-1: View of the southern offset of the R510 road upgrade project near the Bierspruit interchange.



Figure 3-2: The R510 road, looking north towards Thabazimbi.



Figure 3-3: A disused farm stall along the R510 road.



Figure 3-4: A river crossing in a central portion of the project area.



Figure 3-5: View of the R510 road in a central portion of the upgrade project area.



Figure 3-6: View of an access road towards the proposed Q3 borrow pit site.



Figure 3-7: View of the proposed Q3 quarry in an abandoned Andalusite mine area on farm Grootfontein 352.



Figure 3-8: View of natural vegetation at the site of the proposed Q3 quarry.



Figure 3-9: General surroundings at the site of the proposed Q3 quarry.



Figure 3-10: View of the R510 road in a northern section of the upgrade project area.



Figure 3-11: The northern offset of the proposed road upgrade project directly south of Thabazimbi.

3.2.3 Limitations and Constraints Summary

The foot site survey for the R510 National Route Upgrade Project primarily focused around areas of potential heritage sensitivity as well as areas of high human settlement catchment probability (for example near drainage lines, in association with vegetation changes or around soil disturbances). No major constraints were encountered during the site visit for this study. Even though it might be assumed that survey findings are representative of the heritage landscape of the project area for the R510 National Route Upgrade Project, it should be stated that the possibility exists that individual sites could be missed due to the localised nature of some heritage remains as well as the possible presence of sub-surface archaeology. Therefore, maintaining due cognisance of the integrity and accuracy of the archaeological survey, it should be stated that the heritage resources identified during the study do not necessarily represent all the heritage resources present in the project area. The subterranean nature of some archaeological sites, dense vegetation cover and visibility constraints sometimes distort heritage representations and any additional heritage resources located during consequent development phases must be reported to the Heritage Resources Authority or an archaeological specialist.

3.3 Impact Assessment

For consistency among specialists, impact assessment ratings by Exigo Specialists are generally done using the Plomp¹ impact assessment matrix scale supplied by Exigo. According to this matrix scale, each heritage receptor in the study area is given an impact assessment. A cumulative assessment for the proposed project is also included.

4 ARCHAEO-HISTORICAL CONTEXT

4.1 The archaeology of Southern Africa

Archaeology in Southern Africa is typically divided into two main fields of study, the **Stone Age** and the **Iron Age** or **Farmer Period**. The following table provides a concise outline of the chronological sequence of periods, events, cultural groups and material expressions in Southern African pre-history and history.

Table 1 Chronological Periods across Southern Africa

Period	Epoch	Associated cultural groups	Typical Material Expressions
Early Stone Age 2.5m – 250 000 YCE	Pleistocene	Early Hominins: <i>Australopithecines</i> <i>Homo habilis</i> <i>Homo erectus</i>	Typically large stone tools such as hand axes, choppers and cleavers.
Middle Stone Age 250 000 – 25 000 YCE	Pleistocene	First <i>Homo sapiens</i> species	Typically smaller stone tools such as scrapers, blades and points.
Late Stone Age 20 000 BC – present	Pleistocene / Holocene	<i>Homo sapiens sapiens</i> including San people	Typically small to minute stone tools such as arrow heads, points and bladelets.
Early Iron Age / Early Farmer Period 300 – 900 AD	Holocene	First Bantu-speaking groups	Typically distinct ceramics, bead ware, iron objects, grinding stones.
Middle Iron Age (Mapungubwe / K2) / early Later Farmer Period 900 – 1350 AD	Holocene	Bantu-speaking groups, ancestors of present-day groups	Typically distinct ceramics, bead ware and iron / gold / copper objects, trade goods and grinding stones.
Late Iron Age / Later Farmer Period 1400 AD -1850 AD	Holocene	Various Bantu-speaking groups including Venda, Thonga, Sotho-Tswana and Zulu	Distinct ceramics, grinding stones, iron objects, trade objects, remains of iron smelting activities including iron smelting furnace, iron slag and residue as well as iron ore.
Historical / Colonial Period ±1850 AD – present	Holocene	Various Bantu-speaking groups as well as European farmers, settlers and explorers	Remains of historical structures e.g. homesteads, missionary schools etc. as well as, glass, porcelain, metal and ceramics.

4.2 The Waterberg and Thabazimbi: Specific Themes.

The cultural landscape of the Waterberg encompasses a period of time that spans millions of years, covering human cultural development from the Stone Ages up to recent times. It depicts the interaction between the first humans and their adaptation and utilization to the environment, the migration of people, technological advances, warfare and contact and conflict. Resources, and in particular mineral resources, in

¹ Plomp, H.,2004

what is now known as the Thabazimbi region have been extensively utilised by prehistoric and historic groups. The greater region has several important Stone Age localities with deep occupation deposits and importantly, a widespread occurrence of open-air sites. The shelter site of Olieboomspoor near Lephalale show a succession from the Earlier, Middle and Later Stone Ages (ESA, MSA and LSA) and up to historic times (van der Ryst 2006). Early Iron Age (EIA) localities such as Diamant are particular important. At this locality in the western Waterberg the EIA facies of Diamant was first identified at the eponymous locality (Huffman 1990). This site has also delivered the earliest evidence for glass trade beads and domesticated dogs in the Limpopo Province (van der Ryst 2006). The movement of African farmers into this region is documented by their ceramics and settlements (Huffman 2007b). The later occupations of agropastoralists groups are complex (Schapera 1942, 1965; Breutz 1953, 1989; Bergh 1998). The accounts of early travellers provide important data on the fauna, flora and inhabitants of the Waterberg. The observations of travellers, missionaries and hunters who traversed the region throughout the 18th and the 19th centuries constitute a source of implicit ethnography on the late presence of hunting and gathering groups, the African farmers and incoming colonists (Baines 1872, 1877; Smith 1836; Schlömann 1896; Wallis [Baines] 1946; Burke [Mauch's journals] 1969). The region is also rich in rock art (Eastwood and Eastwood 2006).

4.2.1 The Stone Ages

The Earlier Stone Age (ESA), from between 1.5 million and 250 000 years ago, refers to the earliest that *Homo sapiens sapiens*' predecessors began making stone tools. The earliest stone tool industry was referred to as the Olduvai Industry, originating from stone artefacts recorded at Olduvai Gorge, Tanzania. The Acheulian Industry, the predominant Southern African ESA Industry, which replaced the Olduvai Industry approximately 1.5 million years ago, is attested to in diverse environments and over wide geographical areas. The hallmark of the Acheulian Industry is its large cutting tools (LCTs or bifaces), primarily handaxes and cleavers. The most well-known ESA site in Southern Africa is Amanzi Springs, situated about 10km north-east of Uitenhage, near Port Elizabeth (Deacon 1970). In a series of spring deposits a large number of stone tools were found in situ to a depth of 3-4m. Wood and seed material preserved remarkably very well within the spring deposits, and possibly date to between 800 000 to 250 000 years old. Large stone ESA tools are often found associated with the gravels in the area, and were later replaced by smaller stone tools called the Middle Stone Age flake and blades industries.

The Middle Stone Age (MSA) spans a period from 250 000-30 000 years ago and focuses on the emergence of modern humans through the change in technology, behaviour, physical appearance, art and symbolism. The large handaxes and cleavers were replaced by smaller stone artefacts called the MSA flake and blade industries. Surface scatters of these flake and blade industries occur widespread across Southern Africa. The majority of MSA sites occur on flood plains and sometimes in caves and rock shelters. Sites usually consist of large concentrations of knapped stone flakes such as scrapers, points and blades and associated manufacturing debris.

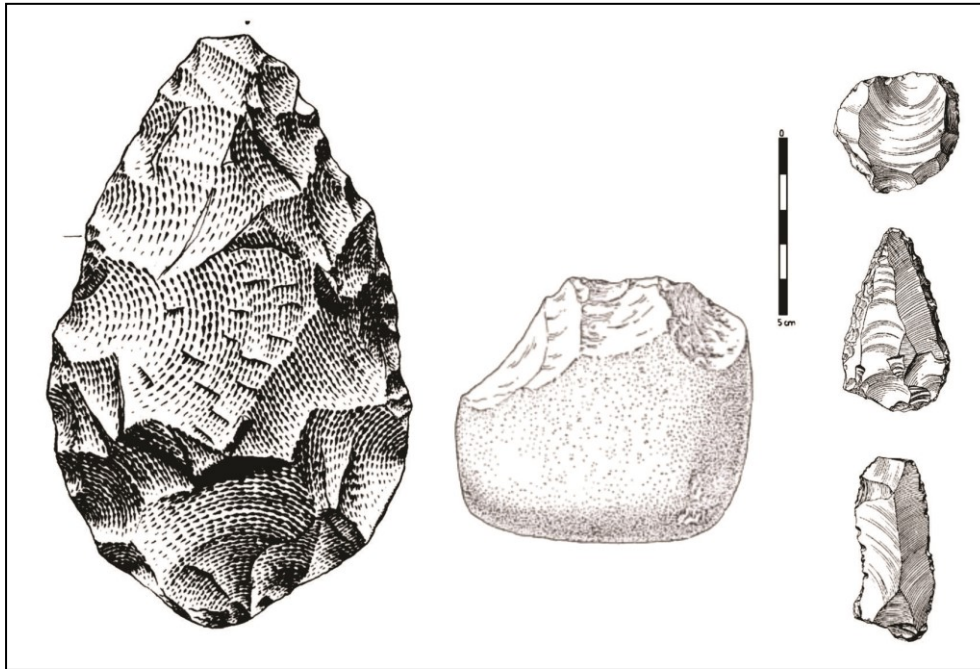


Figure 4-1: Typical ESA handaxe (left) and cleaver (center). To the right is a MSA scraper (right, top), point (right, middle) and blade (right, bottom).

The Later Stone Age (LSA) spans the period from about 20 000 years ago until the colonial era, although some communities continue making stone tools today. The period between 30 000 and 20 000 years ago is referred to as the transition from the MSA to LSA; although there is a lack of crucial sites and evidence that represent this change. The LSA is marked by a series of technological innovations, new tools and artefacts, the development of economic, political and social systems, and core symbolic beliefs and rituals. The stone toolkits changed over time according to time-specific needs and raw material availability, from smaller microlithic Robberg, Wilton Industries and in between, the larger Albany/Oakhurst and the Kabeljous Industries. Bored stones used as part of digging sticks, grooved stones for sharpening and grinding and stone tools fixed to handles with mastic also become more common. Fishing equipment such as hooks, gorges and sinkers also appear within archaeological excavations. Most importantly bows and arrows revolutionized the hunting economy. It was only within the last 2000 years that earthenware pottery was introduced. Before then tortoiseshell bowls were used for cooking and ostrich eggshell (OES) flasks were used for storing water. Sites dating to the LSA are better preserved in rock shelters, although open sites with scatters of mainly stone tools can occur. Well-protected deposits in shelters allow for stable conditions that result in the preservation of organic materials such as wood, bone, hearths, ostrich eggshell beads and even bedding material

The cultural historical landscape of the Waterberg area spans million years with evidence of hominin occupation, Stone Age traditions, Iron Age farmers and historical events. Makapansgat, a deep limestone cave near Mokopane has yielded remains of *Australopithecus africanus* that dates to more than 3 million years BP and also *Homo erectus*, dating to approximately 1 million years BP. However, Earlier Stone Age (ESA) material is scarce on the Waterberg plateau. The Middle Stone Age (MSA) is abundantly represented in the Waterberg area and archaeological excavations at sites such as the Olieboomspoor Shelter in the north-western part of the Waterberg have yielded rich MSA deposits which display a large degree of specialisation and skill in stone working (Van der Ryst 1996). These groups occupied open camps which were situated in the proximity of water sources such as pans, lakes or rivers. There is a noticeable gap in the Waterberg between MSA assemblages and material from the Later Stone Age (LSA), suggesting that the Waterberg may not have seen dense human occupation for a long period of time. However, Later Stone Age groups, including the San hunter gatherers and Khoi herders frequented the area in the last few

millennia, and numerous LSA sites have been discovered and excavated. Similarly, LSA evidence such as stone implements, ceramics and a wealth of rock paintings and markings are scattered over the plateau.

4.2.2 The Iron Age Farmer Period

The beginnings of the Iron Age (Farmer Period) in Southern Africa are associated with the arrival of a new Bantu speaking population group at around the third century AD. These newcomers introduced a new way of life into areas that were occupied by Later Stone Age hunter-gatherers and Khoekhoe herders. Distinctive features of the Iron Age are a settled village life, food production (agriculture and animal husbandry), metallurgy (the mining, smelting and working of iron, copper and gold) and the manufacture of pottery. Iron Age people moved into Southern Africa by c. AD 200, entering the area either by moving down the coastal plains, or by using a more central route. From the coast they followed the various rivers inland. Being cultivators, they preferred rich alluvial soils. Because of their specific technology and economy, Iron Age people preferred to settle on the alluvial soils near rivers for agricultural purposes and other resources.

Within the last two thousand years, San and Khoi groups were displaced by Iron Age farming communities moving into the Waterberg area, possibly prompted by the spread of tsetse fly into the Lowveld areas. Three phases of Iron Age occupation are generally distinguished in the Waterberg (Aukema 1989). The first phase, known as the Eiland tradition, is characterised by herringbone decoration motives on pottery. Little to no stone walling occurs at sites dating to this phase. On the other hand, sites of the second phase of occupation dating to the Later Iron Age are commonly found on hilltops where they display elaborate stone walling. These settlements could be linked to the arrival of Nguni-speakers (Ndebele) in the region between the 16th and 17th centuries AD. The third phase of Iron Age settlement, dating to the 18th and early 19th century, contains bi and multi chrome (red and black) pottery commonly attributed to a Sotho-Tswana ceramic tradition known as Moloko (see *Sotho-Tswana History* section below).

Early Sotho-Tswana History

Within a larger archaeological context, Iron Age settlement representations in the form of stone walling in the Waterberg can undoubtedly be traced back to ancestral Sotho-Tswana occupation and developments from the sixteenth century AD onwards. Diagnostic pottery assemblages are commonly used in the South African Iron Age to infer group identities and to trace movements across the landscape. Similarly, the migration of the Sotho-Tswana speakers in South Africa in the 16th century marked a new ceramic style, known as Moloko. The Moloko Tradition can be divided into two phases: an early phase (e.g. Icon) in which sites were usually located at the foot of hills and contained little or no stone walling; and a later phase characterised by extensive stone wall complexes which were often erected on hills. In the Waterberg area, this later phase manifested in the Madikwe ceramic facies with pottery typically displaying stab and fingernail impression decoration motives. At around the 17th century, Madikwe pottery developed into a tradition known as “Buispoort”, sites of which display complex and elaborate stone walling. The stone walls were erected to construct stock byres and to demarcate residential units where pole-and-dagha (clay) huts were placed.

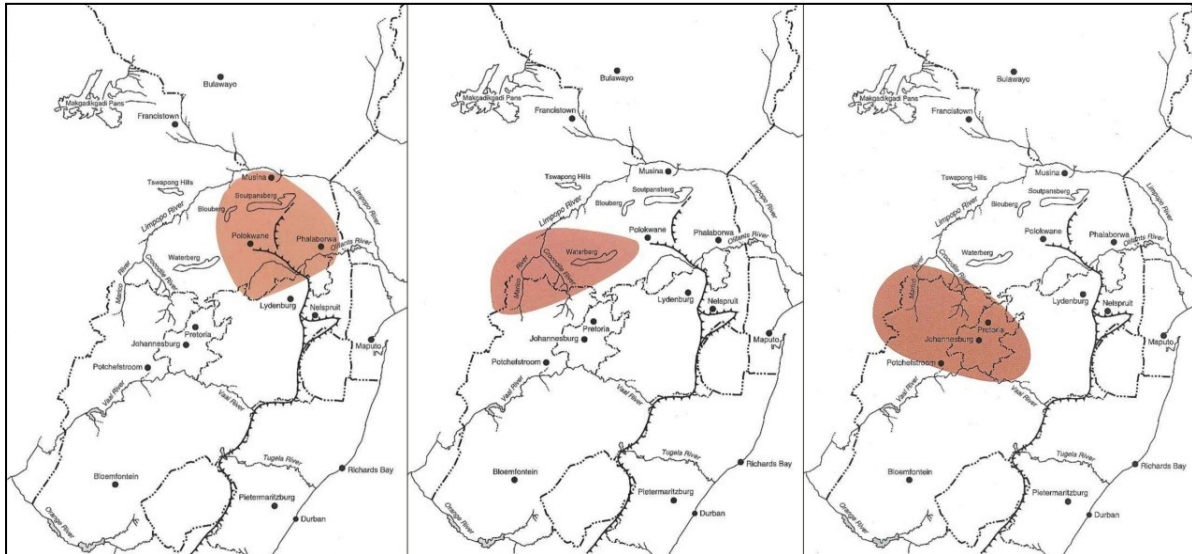


Figure 4-2: Map detailing the distribution of 16th century Maloko (left), 17th century Madikwe (centre) and 18th century Buispoort tradition sites (After Huffman 2007).



Figure 4-3: Ceramic decoration motives typical of 17th century Madikwe (left) and later Buispoort (right) facies (After Huffman 2007).

In addition, various Sotho-Tswana groups were found in the interior of the Highveld areas of South Africa by the end of the 18th century. These units occupied a large area, from present-day Botswana across large sections of the old Transvaal, the Free State Province into the Northern Cape. Based on Sotho-Tswana oral histories various groups acted as cores from which the Sotho-speaking communities sprouted.

4.2.3 Rock Art of the Waterberg Landscape

The Waterberg Plateau is rich in rock art and rock markings and many such sites are still to be described and studied. At many sites “refined” San paintings occur with cruder depictions in red or white paint (sometimes black), painted directly with fingers by later Farmer groups. Numerous paintings of people in trance positions, dance scenes of men and women, men with hunting equipment, a large variety of antelope and other animals, imaginary rain animals, handprints, and geometric designs form part of the contents of the rock art of the Waterberg (Van der Ryst 1998). Two traditions of Rock Art occur in the Waterberg. First the more "naturalised" form of fine-line art, including skilled depictions of animals and

people, attributed to San Hunter Gatherers. The second tradition, often called “Late White” art, is characterised by more geometric, schematic illustrations which includes a large amount of finger painting. This tradition is associated with Iron Age farmers.

4.2.4 Pastoralism and the last 2000 years

Until 2000 years ago hunter-gatherer communities traded, exchanged goods, encountered and interacted with other hunter-gatherer communities. From about 2000 years ago the social dynamics of the Southern African landscape started changing with the immigration of two 'other' groups of people, different in physique, political, economic and social systems, beliefs and rituals. One of these groups, the Khoekhoe pastoralists or herders entered Southern Africa with domestic animals, namely fat-tailed sheep and goats, travelling through the south towards the coast. They also introduced thin-walled pottery common in the interior and along the coastal regions of Southern Africa. Their economic systems were directed by the accumulation of wealth in domestic stock numbers and their political make-up was more hierarchical than that of the hunter-gatherers.

4.2.5 Historical and Colonial Times and Recent History

The Historical period in Southern Africa encompass the course of Europe's discovery of South Africa and the spreading of European settlements along the East Coast and subsequently into the interior. In addition, the formation stages of this period are marked by the large scale movements of various Bantu-speaking groups in the interior of South Africa, which profoundly influenced the course of European settlement. Finally, the final retreat of the San and Khoekhoen groups into their present-day living areas also occurred in the Historical period in Southern Africa.

The Waterberg was considered remote and inaccessible by early white migrants from the south and, with the exception of a few hunting and trading expeditions passing through, the area was one of the last regions in the former Transvaal to be permanently occupied by white farmers. Although the first Voortrekker farmers moved into the Waterberg during the 1850's, the region has been increasingly occupied on a regular basis only since the early part of the twentieth century. The early historical period of the area is dominated by the siege of Makapansgat where in September 1854, Chief Makapane and over 1 500 of his people died of hunger, dehydration and injuries after being besieged in the cave by a Boer commando in retaliation for an attack on a Voortrekker settlement. The majority of farms in the Waterberg area were surveyed in the late 1860's as part of the Transvaal government's strategy to settle white farmers in the Waterberg region. At that time, access to the Waterberg plateau was circuitous and difficult with the shortest route extending via Sandrivierspoort near present-day Vaalwater. After a railway line to Vaalwater was completed in the 1920's, maize became an economically viable crop but by the end of the 1960's, slumps in maize prices resulted in many farmers abandoning crop farming in favour of cattle. Large scale iron ore mining has emerged to become a primary economical enterprise in recent years. The town Northam was proclaimed in 1946 by E.H.J. Fulls on the farm Leeukoppie, which belonged to H Herd, and was originally one of a number of farms allocated to British veterans of the Anglo-Boer war. There are chrome and platinum mines in the area surrounding the town. However, farming communities have settled in the landscape at the beginning of the 20th century.

4.2.6 Documented Heritage Sites and sensitive areas in the Project Landscape

During surveys for Rhino Minerals Andalusite Mine on the Farm Buffelsfontein 353 KQ, Huffman (2004, 2006a, 2007a, 2009a) recorded an EIA village on red colluvial/alluvial deposits and several grain bin stands. The LIA homesteads contained several burnt houses. He ascribed the burning to a severe drought (Huffman 2009b). He also noted MSA lithics but not of any significance. In a subsequent AIA no settlements were

recorded but isolated fragments of pottery and slag suggest a buried occupation (Huffman 2009a). Van Schalkwyk (2007) in an assessment for cultural heritage resources on sections of the farms Amandelbult 383KQ and Elandsfontein 386KQ in the Thabazimbi District recorded surface MSA and LSA lithics. He also noted two possible EIA sites whereas most of the others that were identified are from the Late Iron Age/early Historical period, the latter features assigned Medium significance. A buffer zone is already in place following on previous recommendations on Iron Age remains within this general area (Van Schalkwyk 1994, 2001, 2003, 2004; Van Schalkwyk et al. 2004). Coetzee (2008) in a report for the PPC expansion project recorded only a small Stone Age lithic scatter from the prehistoric period. However, 10 historical houses from the 1930s to 1940s have been documented as well as several graves. In the greater region Dreyer (2011) in an assessment for proposed chrome mining developments found no heritage remains at Hartbeestkopje 367KQ, Schilpadnest 385KQ and Moddergat 389KQ, in the Northam District but recorded historical material at Zwartkop 369KQ. At Boikarabelo excavations of an extensive grain bin-site and surface collections of around 12 Iron Age settlements demonstrated Tswana settlement sequences that include a probable early Moloko (probably Icon) facies and at least one site had been identified to the Letsibogo facies. The relative age of the sites were therefore inferred to range from the late 17th to late 18th centuries (Digby Wells Environmental 2011). Hutten (2013a, 2013b, 2013c) in several assessments for solar developments noted that there was an absence of heritage resources on the farms Liverpool and Aapiesdaai near Koedoeskop, whereas a historic structure, outside the developments, was recorded at Grootkuil. Van Vollenhoven in an HIA for the proposed development of a limestone mine on Portion 1 of the farm Nooitgedacht 136 JQ, Portion 1 of the farm Buffelskraal 545 KQ and Portions 3, 4, 5, 6 and the Remainder of Krokodilkraal 545 KQ in the Thabazimbi District reported that no heritage resources have been identified and that the surveyed properties have been used for cattle farming and extensive agriculture. In a draft scoping report for the proposed township on Portion 20 and 22 of the farm Theunispan 293 LQ, Portion 1-4 and a portion of the remainder of the Farm Grootdoorn 292 LQ, portion 3 of the Farm Steenbokpan 295 seven heritage sites of significance or value were identified within the area proposed for the development of the Steenbokpan Extension 3 Township. These comprise five informal cemeteries, all on portions of Grootdoorn and two historic structures of the Harmse family homestead (Ila 2014; PGS 2014). In an extension of a mining licence for clay extraction on the farm Nooitgedacht 436 JR Portion 25 an informal cemetery with 15 graves was identified (African Heritage Consultants 2013). African Heritage Consultants (2011, 2014) in a Phase 1 AIA identified numerous stone-walled enclosures, a pre-colonial mine, graves, and historic structures that include a weir and bridge at the Sondagsriver. The scoping report on heritage for Project Infinity Sishen Iron Ore Thabazimbi Mine (Shangoni Management Services 2013) noted that MSA lithics were present in an area with sheet erosion.

The proposed mining on Wachsteenbietjesdraai 350 KQ and Kwaggashoek 345 KQ is in close proximity from the Mostert Tunnel Cave south of Thabazimbi that has significant geological formations. Gatkop Cave on the farm Randstephane 455 KQ ESE of Thabazimbi was also investigated. The locality lies within an area with rich iron ore deposits that are currently being explored by Aquila Resources in view of future extraction. It is an important heritage resource of high cultural significance that is still being used for ritual ceremonies and constitutes a contentious issue in view of the developments. Madimatle Mountain at Donkerpoort 448 KQ and Gatkop Cave on Randstephane 455 KQ hold significant spiritual, ancestral and cultural heritage importance to the local community, local traditional healers, local traditional leaders, persons that practice and belong to certain African Christian denominations. Kruger (2015) identified a large Iron Age occupation site was documented around the slopes of a prominent hill directly east of the R510 road. At the site, which (including the hill) measures approximately 500m x 400m, clear vegetation changes and the occurrence of *Euphorbia candelabrum* trees, dense stands of *Cenchrus ciliaris* (blue buffalo grass) and couch grass indicate middens, cattle dung accumulations and activity areas. *Cenchrus ciliaris* (blue buffalo grass) is often a good indication of the presence of Iron Age sites where these grass

types are closely linked to nitrate-rich livestock enclosures (e.g. Denbow 1979). A number of collapsed stone wall structures, terraces and platforms occur at the site and considering the intensification of stone wall building in this landscape after the 17th century as well as the settlement of Sotho-Tswana groups, the walls are probably not older than 300 years. Based on observations derived from the aerial survey it is clear that the site is part of a larger complex of which the nucleus seems to centre around a large hill directly east of the site discussed. Here, large occupation areas and a number of stone wall structures are visible on aerial imagery.



Figure 4-4: View of the small hill indicating the location of an Iron Age farmer site south of Bierspruit.



Figure 4-5: Overgrown stone walling visible at an Iron Age site near Bierspruit.

5 RESULTS: ARCHAEOLOGICAL SURVEY

In terms of heritage resources, the landscape around the project area is primarily well known for the occurrence of Iron Age Farmer Period and Historical Period occurrences. However, large sections of the proposed R510 National Route Upgrade Project alignments occur along areas that have been altered extensively by historical and recent development largely sterilising the area of heritage remains. Two heritage receptors were nonetheless identified in the R510 National Route Upgrade Project study area and these were uniquely coded **EXIGO-R510UG-HP01** (Exigo R510 Upgrade Historical Period xx) and **EXIGO-R510UG-BP01** (Exigo R510 Upgrade Burial Place xx).

5.1 The Stone Age

Stone Age remains associated with caves, outcrops/hills and river courses are known to exist in the larger Waterberg area. However, no stone tools or associated material culture or evidence of any factory or workshop site were found in the project areas.

5.2 The Iron Age Farmer Period

A frontier zone between the east and the west, the Waterberg landscape is rich in precolonial Iron Age Farmer Period remnants. However, the site inspection identified no Iron Age farmer sites.

5.3 Colonial Period and recent times

European and local farming communities settled in Waterberg and the Highveld during the Colonial Period in the last century. One site of Historical potential was noted during the site inspection.

- Site EXIGO-R510UG-HP01 (S24.76694° E27.32462°)

Three red brick house structures of possible Historical origin occur east of the R510 road next to the adjacent railway line, at around 12.k km of the proposed upgrade alignment. It is possible that the buildings were once used as a railway station and they are currently used as dwellings. The multi-room structures with pitched corrugated iron roofs are relatively well preserved with signs of more recent maintenance to the buildings. A clear temporal context for the structures is not known but considering its architectural style, the houses most probably date to the second part of the 20th century and, associated with the railway line at the site. The buildings might be older than 60 years, which implies that they are potentially protected heritage resources. However, the buildings occur approximately 50m away from the project impact footprint and no direct t impact on the site is anticipated.



Figure 5-1: Aerial image indicating the location of Site EXIGO-R510UG-HP01 in relation to the R510 Upgrade project impact footprint (shaded yellow line).



Figure 5-2: View of red brick structures, possibly railway station buildings at Site EXIGO-R510UG-HP01.

5.4 Graves

A single burial site was documented in the project area subject to this assessment. The burial place holds number graves, some of which of which are older than 60 years.

- **Site EXIGO-R510UG-BP01 (S24.62402° E27.38809°)**

A cemetery containing at least 25 graves occurs directly north of the R510 road on a portion of the farm Wachteenbietjesdraai 350 GQ, at around 32.9km of the proposed upgrade alignment. The graves belong to members of various families, including the Mmalesego, Mosito, Gqezengele, Matlhagare, Ramphofane and Ramatsokha families. Most of the burials, which are placed to an east-west orientation, are dressed with marked marble headstones and gravestones. The dates of passing on the headstones range from between the 1970's up to present day. The cemetery is currently still in use, as new tombstone was erected on a recent burial at the time of the field survey. Material culture such as enamel and glass containers was observed in association with some of the burials. The remains of a small dilapidated building occur at the

site. This concrete brick structure has no roof or windows and it is in a state of dereliction. The site is enclosed in a dilapidated fence and access control is not applied. The resource is of high heritage significance, it occurs in close proximity of the project impact footprint (approximately 30m) and a peripheral impact on the site might occur.



Figure 5-3: Aerial image indicating the location of Site EXIGO-R510UG-BP01 in relation to the R510 Upgrade project impact footprint (shaded yellow line).



Figure 5-4: Human burials with marble grave dressings in a cemetery at Site EXIGO-R510UG-BP01.



Figure 5-5: The remains of a small building and graves visible at Site EXIGO-R510UG-BP01.

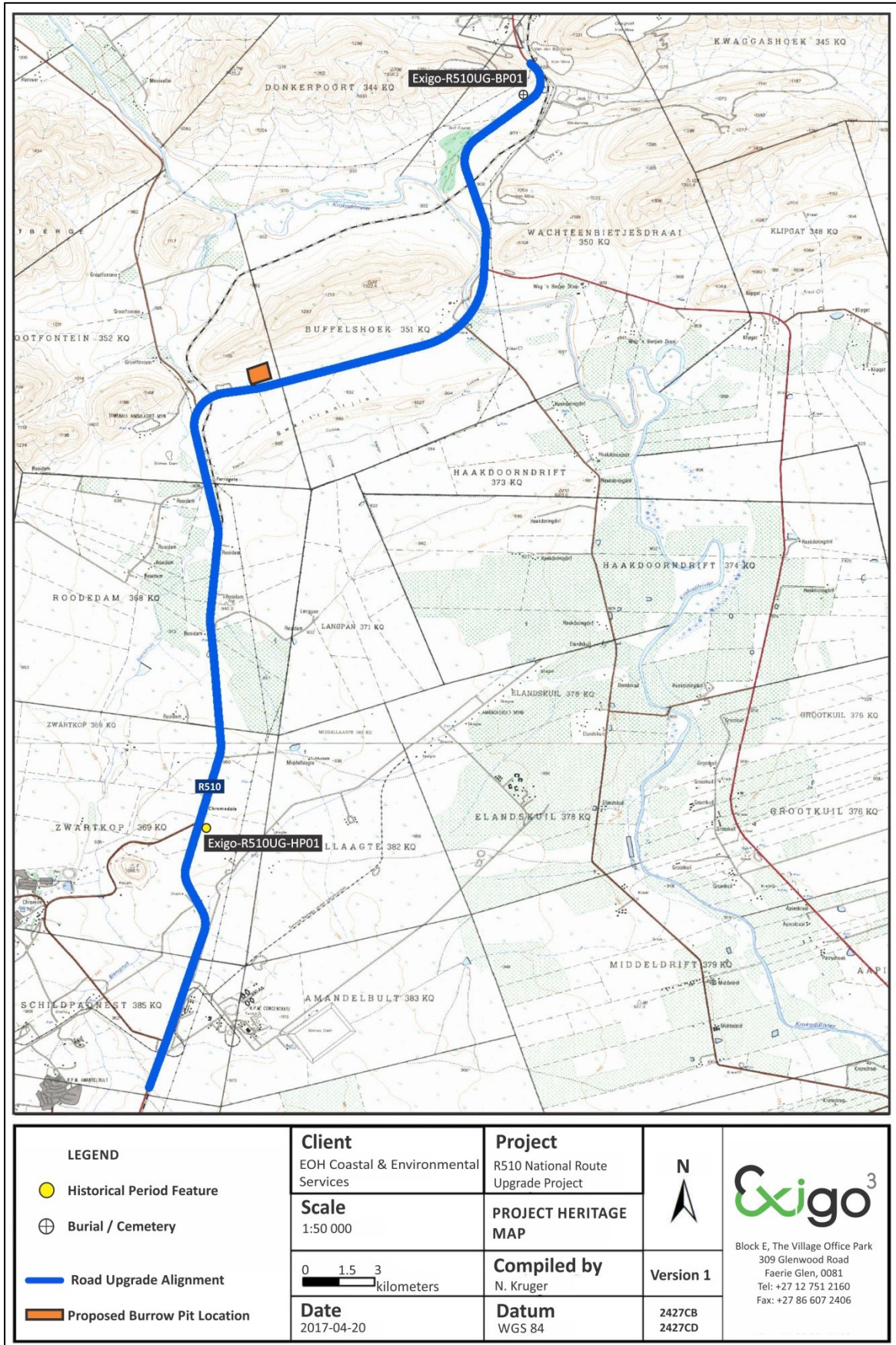


Figure 5-6: Topographical map indicating the location of heritage sites discussed in the text.

6 RESULTS: STATEMENT OF SIGNIFICANCE AND IMPACT RATING

6.1 Potential Impacts and Significance Ratings²

The following section provides a background to the identification and assessment of possible impacts and alternatives, as well as a range of risk situations and scenarios commonly associated with heritage resources management. A guideline for the rating of impacts and recommendation of management actions for areas of heritage potential within the study area is supplied in Section 10.2 of the Addendum.

6.1.1 General assessment of impacts on resources

Generally, the value and significance of archaeological and other heritage sites might be impacted on by any activity that would result immediately or in the future in the destruction, damage, excavation, alteration, removal or collection from its original position, any archaeological material or object (as indicated in the National Heritage Resources Act (No 25 of 1999)). Thus, the destructive impacts that are possible in terms of heritage resources would tend to be direct, once-off events occurring during the initial construction period. However, in the long run, the proximity of operations in any given area could result in secondary indirect impacts. The EIA process therefore specifies impact assessment criteria which can be utilised from the perspective of a heritage specialist study which elucidates the overall extent of impacts.

6.1.2 Direct impact rating

Direct or primary effects on heritage resources occur at the same time and in the same space as the activity, e.g. loss of historical fabric through demolition work. **Indirect effects or secondary effects** on heritage resources occur later in time or at a different place from the causal activity, or as a result of a complex pathway, e.g. restriction of access to a heritage resource resulting in the gradual erosion of its significance, which is dependent on ritual patterns of access (refer to Section 10.3 in the Addendum for an outline of the relationship between the significance of a heritage context, the intensity of development and the significance of heritage impacts to be expected).

The following table summarizes impacts to possible Historical Period structures at **Site EXIGO-R510UG-HP01**, of **medium-low** significance located near the project area.

NATURE OF IMPACT: Impacts could involve displacement or destruction of structures or features in the proposed project area.		
	Without mitigation	With mitigation
EXTENT	Local	Local
DURATION	Permanent	Permanent
MAGNITUDE	Minor	Minor
PROBABILITY	Improbable	Negligible
SIGNIFICANCE	Medium-Low	Low
STATUS	Negative	Neutral
REVERSIBILITY	Non-reversible	Non-reversible
IRREPLACEABLE LOSS OF RESOURCES?	Yes	No

² Based on: Winter, S. & Baumann, N. 2005. *Guideline for involving heritage specialists in EIA processes: Edition 1.*

CAN IMPACTS BE MITIGATED?	N.A
MITIGATION: Site monitoring by ECO.	
CUMULATIVE IMPACTS: No cumulative impact is anticipated.	
RESIDUAL IMPACTS: n/a	

The following table summarizes impacts to a burial site (**Site EXIGO-R510UG-BP01**) of **high** significance located in proximity of the project area.

NATURE OF IMPACT: Impacts could involve displacement or destruction of burials in proximity the project area.		
	Without mitigation	With mitigation
EXTENT	Local	Local
DURATION	Permanent	Permanent
MAGINITUDE	Major	Minor
PROBABILITY	Probable	Negligible
SIGNIFICANCE	High	Low
STATUS	Negative	Neutral
REVERSIBILITY	Non-reversible	Non-reversible
IRREPLACEABLE LOSS OF RESOURCES?	Yes	No
CAN IMPACTS BE MITIGATED?	N.A	
MITIGATION: Avoidance, site management (fencing, access control), strict site monitoring by ECO, grave relocation.		
CUMULATIVE IMPACTS: No cumulative impact is anticipated.		
RESIDUAL IMPACTS: n/a		

6.2 Evaluation Impacts

Previous studies conducted in the larger Waterberg landscape suggest a rich and diverse archaeological landscape but the surroundings of the R510 National Route Upgrade Project have been transformed along the alignment of the current road. Cognisance should nonetheless be taken of archaeological material that might be present in surface and sub-surface deposits along drainage lines and in pristine areas.

6.2.1 Archaeology

The study did not identify any archaeological receptors which will be directly impacted by the proposed project and no impact on archaeological sites or features is anticipated.

6.2.2 Built Environment

Possible Historical Period buildings occur in proximity of the proposed road upgrade alignment. For the rest of the project area, the general landscape has limited significance in terms of the built environment as there are no additional apparent old buildings, structures, or features along the R510 road. The potential impact on the built environment the resources is considered to be LOW but this impact rating can be

limited to a NEGLIBLE impact by the implementation of mitigation measures for the sites, if / when required.

6.2.3 Cultural Landscape

Even though the larger Waterberg area around Thabazimbi comprises a rich cultural horizon, the landscape surrounding the proposed project areas have been transformed by mining, infrastructure development and farming. Further away from the project area, the landscape is typical of the Western Trans-Vaal with large areas of flat plains, occasional mountain ranges and undulating hills occurring throughout. This landscape stretches over many kilometres and the proposed project is unlikely to result in a significant impact on the landscape.

6.2.4 Graves / Human Burials Sites

A burial site was located near the northern offset of the upgrade alignment in close proximity of the road upgrade project. This receptor is of high significance for their social and cultural value. A potential peripheral impact on the resources is anticipated to be HIGH but this impact rating can be limited to a NEGLIBLE impact by the implementation of mitigation measures (avoidance, site management, site monitoring / grave relocation) for the sites, if / when required.

In the rural areas of the Waterberg graves and cemeteries sometimes occur within settlements or around homesteads but they are also randomly scattered around archaeological and historical settlements. The probability of additional and informal human burials encountered during development should thus not be excluded. In addition, human remains and burials are commonly found close to archaeological sites; they may be found in "lost" graveyards, or occur sporadically anywhere as a result of prehistoric activity, victims of conflict or crime. It is often difficult to detect the presence of archaeological human remains on the landscape as these burials, in most cases, are not marked at the surface. Human remains are usually observed when they are exposed through erosion. In some instances packed stones or rocks may indicate the presence of informal pre-colonial burials. If any human bones are found during the course of construction work then they should be reported to an archaeologist and work in the immediate vicinity should cease until the appropriate actions have been carried out by the archaeologist. Where human remains are part of a burial they would need to be exhumed under a permit from SAHRA (for pre-colonial burials as well as burials later than about AD 1500). Should any unmarked human burials/remains be found during the course of construction, work in the immediate vicinity should cease and the find must immediately be reported to the archaeologist, or the South African Heritage Resources Agency (SAHRA). Under no circumstances may burials be disturbed or removed until such time as necessary statutory procedures required for grave relocation have been met.

Heritage resources occur in close proximity of alignments proposed for the R510 National Route Upgrade Project and potential peripheral impact on these heritage receptors might occur. However, this impact can be mitigated by means of avoidance and site monitoring during development. In the opinion of the author of this Archaeological Impact Assessment Report, the proposed road upgrade proceed from a culture resources management perspective, provided that mitigation measures are implemented where applicable, and provided that no subsurface heritage remains are encountered during construction.

6.3 Management actions

Recommendations for relevant heritage resources management actions are vital to the conservation of heritage resources. A general guideline for recommended management actions is included in Section 10.4 of the Addendum. The following management measures would be required during implementation of the

proposed R510 National Route Upgrade Project.

OBJECTIVE: prevent unnecessary disturbance and/or destruction of previously undetected heritage receptors.

For the remains of the possible Historical Period site (Site EXIGO-R510UG-HP01) of medium-low significance within the project area the following are required in terms of heritage management and mitigation:

PROJECT COMPONENT/S	All phases of construction and operation.		
POTENTIAL IMPACT	Damage/destruction of sites.		
ACTIVITY RISK/SOURCE	Digging foundations and trenches into sensitive deposits that are not visible at the surface.		
MITIGATION: TARGET/OBJECTIVE	To locate previously undetected heritage remains / graves as soon as possible after disturbance so as to maximize the chances of successful rescue/mitigation work.		
MITIGATION: ACTION/CONTROL	RESPONSIBILITY	TIMEFRAME	
Fixed Mitigation Procedure (required)			
Site Monitoring: Regular examination of trenches and excavations in order to detect and preserve previously undocumented heritage receptors. Permitting: Destruction permitting if and when required.	ECO, HERITAGE ASSESSMENT PRACTITIONER	Monitor as frequently as practically possible. Prior to the commencement of construction and earth-moving.	
PERFORMANCE INDICATOR	Archaeological sites are discovered and mitigated with the minimum amount of unnecessary disturbance.		
MONITORING	Successful location of sites by person/s monitoring.		

For the highly significant burial site (Site EXIGO-R510UG-BP01) occurring in close proximity of the project area the following are required in terms of heritage management and mitigation:

PROJECT COMPONENT/S	All phases of construction and operation.		
POTENTIAL IMPACT	Damage/disturbance to subsurface burials and surface burial features.		
ACTIVITY RISK/SOURCE	Digging foundations and trenches into sensitive deposits that are not visible at the surface.		
MITIGATION: TARGET/OBJECTIVE	To locate human burials as soon as possible after disturbance so as to maximize the chances of successful rescue/mitigation work.		
MITIGATION: ACTION/CONTROL	RESPONSIBILITY	TIMEFRAME	
Preferred Mitigation Procedure			
Avoidance: Implement a heritage conservation buffer of at least 20m around the cemetery; if necessary redesign the road upgrade alignment to avoid the heritage resource and the proposed conservation buffer. Fence the burial site and apply access control. Implement a site management plan detailing strict site management	DEVELOPER QUALIFIED HERITAGE SPECIALIST	Prior to the commencement of construction and earth-moving.	

conservation measures.		
Alternative Mitigation Procedure (if preferred mitigation procedure is not feasible)		
Grave Relocation: Relocation of burials and documentation of site, full social consultation with affected parties, possible conservation management and protection measures. Subject to authorisations and relevant permitting from heritage authorities and affected parties.	QUALIFIED HERITAGE SPECIALIST	Prior to the commencement of construction and earth-moving.
Fixed Mitigation Procedure (required)		
Site Monitoring: Regular examination of trenches and excavations in this area in order to avoid the destruction of previously undetected burials or heritage remains.	ECO	Monitor as frequently as practically possible.
PERFORMANCE INDICATOR	Archaeological sites are discovered and mitigated with the minimum amount of unnecessary disturbance.	
MONITORING	Successful location of sites by person/s monitoring.	

7 RECOMMENDATIONS

Previous heritage studies conducted in the Waterberg Province region around Thanazimbi suggest a rich and diverse archaeological landscape but the surroundings of the proposed R510 National Route Upgrade Project have been transformed by ruralisation, infrastructure development and farming and mining. Cognisance should nonetheless be taken of archaeological material that might still be present in surface and sub-surface deposits along more pristine areas. The following recommendations are made based on general observations in the proposed R510 National Route Upgrade Project area:

- A Palaeontological Desktop Assessment for the project has been commissioned but as a general rule, any fossil remains such as fossil fish, reptiles or petrified wood exposed during construction should be carefully safeguarded and the relevant heritage resources authority (Limpopo-PHRA) should be notified immediately so that the appropriate action can be taken by a professional palaeontologist.
- Three possible Historical Period structures (**Site EXIGO-R510UG-HP01**) are of medium-low significance and these buildings are currently used as dwellings. The sites are located in proximity of the project area (>50m) and it is recommended that the sites and any activities in its surrounds be monitored in order to avoid the destruction of previously undetected heritage remains. The necessary destruction permits should be obtained from the relevant Heritage Resources Authorities prior to the possible destruction of the features.
- A cemetery identified within close proximity (approximately 30m) of the road upgrade alignments (**Site EXIGO-R510UG-BP01**) is of high significance but according to design plans, no work will be done outside of the existing road reserve, where it is assumed that the current proximity will remain preserved. SAHRA requires a 50m conservation buffer for all burials as a primary measure but the relaxation of this measure could be considered considering the existing proximity between the cemetery and the road reserve. As such, a conservation buffer of at least 20m should be maintained, subject to approval from the relevant Heritage Body. In addition, it is recommended that the cemetery be fenced off and that access control be applied during all phases of construction. The fence should be placed at a distance of at least 10m from the closest graves. The developer should carefully liaise with the heritage specialist and SAHRA with regards to the management and monitoring of any human grave or cemetery in order to detect and manage negative impact on the sites. **Should impact on any human burial prove inevitable, full grave relocations are recommended for these burial grounds. This measure should be undertaken by a qualified archaeologist, and in accordance with relevant legislation, permitting, statutory permissions and subject to any local and regional provisions and laws and by-laws pertaining to human remains. A full social consultation process should occur in conjunction with the mitigation of cemeteries and burials (see Addendum B).**
- Considering the localised nature of heritage remains, the general monitoring of the development progress by an ECO or by the heritage specialist is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately
- It is essential that cognisance be taken of the larger archaeological landscape of the area in order to avoid the destruction of previously undetected heritage sites. It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the Study Area along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period

occur on farms in the area and these resources should be avoided during all phases of construction and development, including the operational phases of the development.

In addition to these site-specific recommendations, careful cognizance should be taken of the following:

- As Palaeontological remains occur where bedrock has been exposed, all geological features should be regarded as sensitive.
- Water sources such as drainage lines, fountains and pans would often have attracted human activity in the past. As Stone Age material the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits.

8 GENERAL COMMENTS AND CONDITIONS

This AIA report serves to confirm the extent and significance of the heritage landscape of the proposed R510 National Route Upgrade Project area. The larger heritage horizon encompasses rich and diverse archaeological landscapes and cognizance should be taken of heritage resources and archaeological material that might be present in surface and sub-surface deposits. If, during construction, any possible archaeological material culture discoveries are made, the operations must be stopped and a qualified archaeologist be contacted for an assessment of the find. Such material culture might include:

- Formal Earlier Stone Age stone tools.
- Formal MSA stone tools.
- Formal LSA stone tools.
- Potsherds
- Iron objects.
- Beads made from ostrich eggshell and glass.
- Ash middens and cattle dung deposits and accumulations.
- Faunal remains.
- Human remains/graves.
- Stone walling or any sub-surface structures.
- Historical glass, tin or ceramics.
- Fossils.

If such sites were to be encountered or impacted by any proposed developments, recommendations contained in this report, as well as endorsement of mitigation measures as set out by Limpopo-PHRA, SAHRA, the National Resources Act and the CRM section of ASAPA will be required.

It must be emphasised that the conclusions and recommendations expressed in this archaeological heritage sensitivity investigation are based on the visibility of archaeological sites/features and may not therefore, represent the area's complete archaeological legacy. Many sites/features may be covered by soil and vegetation and might only be located during sub-surface investigations. If subsurface archaeological deposits, artefacts or skeletal material were to be recovered in the area during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately (**cf. NHRA (Act No. 25 of 1999)**, Section 36 (6)). It must also be clear that Archaeological Specialist Reports will be assessed by the relevant heritage resources authority (SAHRA).

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10 ADDENDUM 1: HERITAGE LEGISLATION BACKGROUND

10.1 CRM: Legislation, Conservation and Heritage Management

The broad generic term *Cultural Heritage Resources* refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of palaeontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

10.1.1 Legislation regarding archaeology and heritage sites

The South African Heritage Resources Agency (SAHRA) and their provincial offices aim to conserve and control the management, research, alteration and destruction of cultural resources of South Africa. It is therefore vitally important to adhere to heritage resource legislation at all times.

d. National Heritage Resources Act No 25 of 1999, section 35

According to the National Heritage Resources Act of 1999 a historical site is any identifiable building or part thereof, marker, milestone, gravestone, landmark or tell older than 60 years. This clause is commonly known as the "60-years clause". Buildings are amongst the most enduring features of human occupation, and this definition therefore includes all buildings older than 60 years, modern architecture as well as ruins, fortifications and Iron Age settlements. "Tell" refers to the evidence of human existence which is no longer above ground level, such as building foundations and buried remains of settlements (including artefacts).

The Act identifies heritage objects as:

- objects recovered from the soil or waters of South Africa including archaeological and palaeontological objects, meteorites and rare geological specimens
- visual art objects
- military objects
- numismatic objects
- objects of cultural and historical significance
- objects to which oral traditions are attached and which are associated with living heritage
- objects of scientific or technological interest
- any other prescribed category

With regards to activities and work on archaeological and heritage sites this Act states that:

"No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit by the relevant provincial heritage resources authority." (34. [1] 1999:58)

and

"No person may, without a permit issued by the responsible heritage resources authority-

- (d) *destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*
- (e) *destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*

- (f) *trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or*
- (g) *bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites. (35. [4] 1999:58)."*

and

"No person may, without a permit issued by SAHRA or a provincial heritage resources agency-

- (h) *destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*
- (i) *destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority;*
- (j) *bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) and excavation equipment, or any equipment which assists in the detection or recovery of metals (36. [3] 1999:60)."*

e. Human Tissue Act of 1983 and Ordinance on the Removal of Graves and Dead Bodies of 1925

Graves 60 years or older are heritage resources and fall under the jurisdiction of both the National Heritage Resources Act and the Human Tissues Act of 1983. However, graves younger than 60 years are specifically protected by the Human Tissues Act (Act 65 of 1983) and the Ordinance on the Removal of Graves and Dead Bodies (Ordinance 7 of 1925) as well as any local and regional provisions, laws and by-laws. Such burial places also fall under the jurisdiction of the National Department of Health and the Provincial Health Departments. Approval for the exhumation and re-burial must be obtained from the relevant Provincial MEC as well as the relevant Local Authorities.

10.1.2 Background to HIA and AIA Studies

South Africa's unique and non-renewable archaeological and palaeontological heritage sites are 'generally' protected in terms of the National Heritage Resources Act (Act No 25 of 1999, section 35) and may not be disturbed at all without a permit from the relevant heritage resources authority. Heritage sites are frequently threatened by development projects and both the environmental and heritage legislation require impact assessments (HIAs & AIAs) that identify all heritage resources in areas to be developed. Particularly, these assessments are required to make recommendations for protection or mitigation of the impact of the sites. HIAs and AIAs should be done by qualified professionals with adequate knowledge to (a) identify all heritage resources including archaeological and palaeontological sites that might occur in areas of developed and (b) make recommendations for protection or mitigation of the impact on the sites.

The National Heritage Resources Act (Act No. 25 of 1999, section 38) provides guidelines for Cultural Resources Management and prospective developments:

"38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a

development categorised as:

- (a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- (b) the construction of a bridge or similar structure exceeding 50m in length;
- (c) any development or other activity which will change the character of a site:
 - (i) exceeding 5 000 m² in extent; or
 - (ii) involving three or more existing erven or subdivisions thereof; or
 - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
- (d) the re-zoning of a site exceeding 10 000 m² in extent; or
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority,

must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.”

And:

“The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): Provided that the following must be included:

- (k) The identification and mapping of all heritage resources in the area affected;
- (l) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;
- (m) an assessment of the impact of the development on such heritage resources;
- (n) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
- (o) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;
- (p) if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and
- (q) plans for mitigation of any adverse effects during and after the completion of the proposed development (38. [3] 1999:64).”

Consequently, section 35 of the Act requires Heritage Impact Assessments (HIAs) or Archaeological Impact Assessments (AIAs) to be done for such developments in order for all heritage resources, that is, all places or objects of aesthetics, architectural, historic, scientific, social, spiritual, linguistic or technological value or significance to be protected. Thus any assessment should make provision for the

protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60 years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects. Heritage resources management and conservation

10.2 Assessing the Significance of Heritage Resources

Archaeological sites, as previously defined in the National Heritage Resources Act (Act 25 of 1999) are places in the landscape where people have lived in the past – generally more than 60 years ago – and have left traces of their presence behind. In South Africa, archaeological sites include hominid fossil sites, places where people of the Earlier, Middle and Later Stone Age lived in open sites, river gravels, rock shelters and caves, Iron Age sites, graves, and a variety of historical sites and structures in rural areas, towns and cities. Palaeontological sites are those with fossil remains of plants and animals where people were not involved in the accumulation of the deposits. The basic principle of cultural heritage conservation is that archaeological and other heritage sites are valuable, scarce and *non-renewable*. Many such sites are unfortunately lost on a daily basis through development for housing, roads and infrastructure and once archaeological sites are damaged, they cannot be re-created as site integrity and authenticity is permanently lost. Archaeological sites have the potential to contribute to our understanding of the history of the region and of our country and continent. By preserving links with our past, we may not be able to revive lost cultural traditions, but it enables us to appreciate the role they have played in the history of our country.

- Categories of significance

Rating the significance of archaeological sites, and consequently grading the potential impact on the resources is linked to the significance of the site itself. The significance of an archaeological site is based on the amount of deposit, the integrity of the context, the kind of deposit and the potential to help answer present research questions. Historical structures are defined by Section 34 of the National Heritage Resources Act, 1999, while other historical and cultural significant sites, places and features, are generally determined by community preferences. The guidelines as provided by the NHRA (Act No. 25 of 1999) in Section 3, with special reference to subsection 3 are used when determining the cultural significance or other special value of archaeological or historical sites. In addition, ICOMOS (the Australian Committee of the International Council on Monuments and Sites) highlights four cultural attributes, which are valuable to any given culture:

- *Aesthetic value:*

Aesthetic value includes aspects of sensory perception for which criteria can and should be stated. Such criteria include consideration of the form, scale, colour, texture and material of the fabric, the general atmosphere associated with the place and its uses and also the aesthetic values commonly assessed in the analysis of landscapes and townscape.

- *Historic value:*

Historic value encompasses the history of aesthetics, science and society and therefore to a large extent underlies all of the attributes discussed here. Usually a place has historical value because of some kind of influence by an event, person, phase or activity.

- *Scientific value:*

The scientific or research value of a place will depend upon the importance of the data involved, on its rarity, quality and on the degree to which the place may contribute further substantial information.

- *Social value:*

Social value includes the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment to a certain group.

It is important for heritage specialist input in the EIA process to take into account the heritage management structure set up by the NHR Act. It makes provision for a 3-tier system of management including the South Africa Heritage Resources Agency (SAHRA) at a national level, Provincial Heritage Resources Authorities (PHRAs) at a provincial and the local authority. The Act makes provision for two types or forms of protection of heritage resources; i.e. formally protected and generally protected sites:

Formally protected sites:

- Grade 1 or national heritage sites, which are managed by SAHRA
- Grade 2 or provincial heritage sites, which are managed by the provincial HRA (MP-PHRA).
- Grade 3 or local heritage sites.

Generally protected sites:

- Human burials older than 60 years.
- Archaeological and palaeontological sites.
- Shipwrecks and associated remains older than 60 years.
- Structures older than 60 years.

With reference to the evaluation of sites, the certainty of prediction is definite, unless stated otherwise and if the significance of the site is rated high, the significance of the impact will also result in a high rating. The same rule applies if the significance rating of the site is low. The significance of archaeological sites is generally ranked into the following categories.

Significance	Rating Action
No significance: sites that do not require mitigation.	None
Low significance: sites, which may require mitigation.	2a. Recording and documentation (Phase 1) of site; no further action required 2b. Controlled sampling (shovel test pits, augering), mapping and documentation (Phase 2 investigation); permit required for sampling and destruction
Medium significance: sites, which require mitigation.	3. Excavation of representative sample, C14 dating, mapping and documentation (Phase 2 investigation); permit required for sampling and destruction [including 2a & 2b]
High significance: sites, where disturbance should be avoided.	4a. Nomination for listing on Heritage Register (National, Provincial or Local) (Phase 2 & 3 investigation); site management plan; permit required if utilised for education or tourism
High significance: Graves and burial places	4b. Locate demonstrable descendants through social consulting; obtain permits from applicable legislation, ordinances and regional by-laws; exhumation and reinterment [including 2a, 2b & 3]

Furthermore, the significance of archaeological sites was based on six main criteria:

- Site integrity (i.e. primary vs. secondary context),
- Amount of deposit, range of features (e.g., stonewalling, stone tools and enclosures),
- Density of scatter (dispersed scatter),
- Social value,
- Uniqueness, and
- Potential to answer current and future research questions.

A fundamental aspect in assessing the significance and protection status of a heritage resource is often whether or not the sustainable social and economic benefits of a proposed development outweigh the conservation issues at stake. When, for whatever reason the protection of a heritage site is not deemed necessary or practical, its research potential must be assessed and mitigated in order to gain data / information, which would otherwise be lost.

11 ADDENDUM 2: CONVENTIONS USED TO ASSESS THE SIGNIFICANCE OF HERITAGE

11.1 Site Significance Matrix

According to the NHRA, Section 2(vi) the **significance** of heritage sites and artefacts is determined by its aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technical value in relation to the uniqueness, condition of preservation and research potential. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these. The following matrix is used for assessing the significance of each identified site/feature.

2. SITE EVALUATION			
2.1 Heritage Value (NHRA, section 2 [3])	High	Medium	Low
It has importance to the community or pattern of South Africa’s history or pre-colonial history.			
It possesses unique, uncommon, rare or endangered aspects of South Africa’s natural or cultural heritage.			
It has potential to yield information that will contribute to an understanding of South Africa’s natural and cultural heritage.			
It is of importance in demonstrating the principle characteristics of a particular class of South Africa’s natural or cultural places or objects.			
It has importance in exhibiting particular aesthetic characteristics valued by a particular community or cultural group.			
It has importance in demonstrating a high degree of creative or technical achievement at a particular period.			
It has marked or special association with a particular community or cultural group for social, cultural or spiritual reasons (sense of place).			
It has strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa.			
It has significance through contributing towards the promotion of a local sociocultural identity and can be developed as a tourist destination.			
It has significance relating to the history of slavery in South Africa.			
It has importance to the wider understanding of temporal changes within cultural landscapes, settlement patterns and human occupation.			
2.2 Field Register Rating			
National/Grade 1 [should be registered, retained]			
Provincial/Grade 2 [should be registered, retained]			
Local/Grade 3A [should be registered, mitigation not advised]			
Local/Grade 3B [High significance; mitigation, partly retained]			
Generally Protected A [High/Medium significance, mitigation]			
Generally protected B [Medium significance, to be recorded]			
Generally Protected C [Low significance, no further action]			
2.3 Sphere of Significance	High	Medium	Low
International			
National			
Provincial			
Local			
Specific community			

11.2 Impact Assessment Criteria

The following table provides a guideline for the rating of impacts and recommendation of management actions for sites of heritage potential.

Significance of the heritage resource

This is a statement of the nature and degree of significance of the heritage resource being affected by the activity. From a heritage management perspective it is useful to distinguish between whether the significance is embedded in the physical fabric or in associations with events or persons or in the experience of a place; i.e. its visual and non-visual qualities. This statement is a primary informant to the nature and degree of significance of an impact and thus needs to be thoroughly considered. Consideration needs to be given to the significance of a heritage resource at different scales (i.e. sitespecific, local, regional, national or international) and the relationship between the heritage resource, its setting and its associations.

Nature of the impact

This is an assessment of the nature of the impact of the activity on a heritage resource, with some indication of its positive and/or negative effect/s. It is strongly informed by the statement of resource significance. In other words, the nature of the impact may be historical, aesthetic, social, scientific, linguistic or architectural, intrinsic, associational or contextual (visual or non-visual). In many cases, the nature of the impact will include more than one value.

Extent

Here it should be indicated whether the impact will be experienced:

- On a site scale, i.e. extend only as far as the activity;
- Within the immediate context of a heritage resource;
- On a local scale, e.g. town or suburb
- On a metropolitan or regional scale; or
- On a national/international scale.

Duration

Here it should be indicated whether the lifespan of the impact will be:

- Short term, (needs to be defined in context)
- Medium term, (needs to be defined in context)
- Long term where the impact will persist indefinitely, possibly beyond the operational life of the activity, either because of natural processes or by human intervention; or
- Permanent where mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient.

Of relevance to the duration of an impact are the following considerations:

- Reversibility of the impact; and
- Renewability of the heritage resource.

Intensity

Here it should be established whether the impact should be indicated as:

- Low, where the impact affects the resource in such a way that its heritage value is not affected;
- Medium, where the affected resource is altered but its heritage value continues to exist albeit in a modified way; and
- High, where heritage value is altered to the extent that it will temporarily or permanently be damaged or destroyed.

Probability

This should describe the likelihood of the impact actually occurring indicated as:

- Improbable, where the possibility of the impact to materialize is very low either because of design or historic experience;
- Probable, where there is a distinct possibility that the impact will occur;
- Highly probable, where it is most likely that the impact will occur; or
- Definite, where the impact will definitely occur regardless of any mitigation measures

Confidence

This should relate to the level of confidence that the specialist has in establishing the nature and degree of impacts. It relates to the level and reliability of information, the nature and degree of consultation with I&AP's and the dynamic of the broader socio-political context.

- High, where the information is comprehensive and accurate, where there has been a high degree of consultation and the socio-political context is relatively stable.

- Medium, where the information is sufficient but is based mainly on secondary sources, where there has been a limited targeted consultation and socio-political context is fluid.
- Low, where the information is poor, a high degree of contestation is evident and there is a state of socio-political flux.

Impact Significance

The significance of impacts can be determined through a synthesis of the aspects produced in terms of the nature and degree of heritage significance and the nature, duration, intensity, extent, probability and confidence of impacts and can be described as:

- Low; where it would have a negligible effect on heritage and on the decision
- Medium, where it would have a moderate effect on heritage and should influence the decision.
- High, where it would have, or there would be a high risk of, a big effect on heritage. Impacts of high significance should have a major influence on the decision;
- Very high, where it would have, or there would be high risk of, an irreversible and possibly irreplaceable negative impact on heritage. Impacts of very high significance should be a central factor in decision-making.

11.3 Direct Impact Assessment Criteria

The following table provides an outline of the relationship between the significance of a heritage context, the intensity of development and the significance of heritage impacts to be expected

HERITAGE CONTEXT	TYPE OF DEVELOPMENT			
	CATEGORY A	CATEGORY B	CATEGORY C	CATEGORY D
CONTEXT 1 High heritage Value	Moderate heritage impact expected	High heritage impact expected	Very high heritage impact expected	Very high heritage impact expected
CONTEXT 2 Medium to high heritage value	Minimal heritage impact expected	Moderate heritage impact expected	High heritage impact expected	Very high heritage impact expected
CONTEXT 3 Medium to low heritage value	Little or no heritage impact expected	Minimal heritage impact expected	Moderate heritage impact expected	High heritage impact expected
CONTEXT 4 Low to no heritage value	Little or no heritage impact expected	Little or no heritage impact expected	Minimal heritage value expected	Moderate heritage impact expected

NOTE: A DEFAULT "LITTLE OR NO HERITAGE IMPACT EXPECTED" VALUE APPLIES WHERE A HERITAGE RESOURCE OCCURS OUTSIDE THE IMPACT ZONE OF THE DEVELOPMENT.

HERITAGE CONTEXTS	CATEGORIES OF DEVELOPMENT
<p>Context 1: Of high intrinsic, associational and contextual heritage value within a national, provincial and local context, i.e. formally declared or potential Grade 1, 2 or 3A heritage resources</p> <p>Context 2: Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade 3B heritage resources.</p> <p>Context 3: Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade 3C heritage resources</p> <p>Context 4: Of little or no intrinsic, associational or contextual heritage value due to disturbed, degraded conditions or extent of irreversible damage.</p>	<p>Category A: Minimal intensity development</p> <ul style="list-style-type: none"> - No rezoning involved; within existing use rights. - No subdivision involved. - Upgrading of existing infrastructure within existing envelopes - Minor internal changes to existing structures - New building footprints limited to less than 1000m2. <p>Category B: Low-key intensity development</p> <ul style="list-style-type: none"> - Spot rezoning with no change to overall zoning of a site. - Linear development less than 100m - Building footprints between 1000m2-2000m2 - Minor changes to external envelop of existing structures (less than 25%) - Minor changes in relation to bulk and height of immediately adjacent structures (less than 25%). <p>Category C: Moderate intensity development</p> <ul style="list-style-type: none"> - Rezoning of a site between 5000m2-10 000m2.

	<ul style="list-style-type: none"> - Linear development between 100m and 300m. - Building footprints between 2000m2 and 5000m2 - Substantial changes to external envelop of existing structures (more than 50%) - Substantial increase in bulk and height in relation to immediately adjacent buildings (more than 50%) <p>Category D: High intensity development</p> <ul style="list-style-type: none"> - Rezoning of a site in excess of 10 000m2 - Linear development in excess of 300m. - Any development changing the character of a site exceeding 5000m2 or involving the subdivision of a site into three or more erven. - Substantial increase in bulk and height in relation to immediately adjacent buildings (more than 100%)
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11.4 Management and Mitigation Actions

The following table provides a guideline of relevant heritage resources management actions is vital to the conservation of heritage resources.

<p>No further action / Monitoring</p> <p>Where no heritage resources have been documented, heritage resources occur well outside the impact zone of any development or the primary context of the surroundings at a development footprint has been largely destroyed or altered, no further immediate action is required. Site monitoring during development, by an ECO or the heritage specialist are often added to this recommendation in order to ensure that no undetected heritage\ remains are destroyed.</p> <p>Avoidance</p> <p>This is appropriate where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have a high negative impact. Mitigation is not acceptable or not possible. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources.</p> <p>Mitigation</p> <p>This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated to a degree of medium to low significance, e.g. the high to medium impact of a development on an archaeological site could be mitigated through sampling/excavation of the remains. Not all negative impacts can be mitigated.</p> <p>Compensation</p> <p>Compensation is generally not an appropriate heritage management action. The main function of management actions should be to conserve the resource for the benefit of future generations. Once lost it cannot be renewed. The circumstances around the potential public or heritage benefits would need to be exceptional to warrant this type of action, especially in the case of where the impact was high.</p> <p>Rehabilitation</p> <p>Rehabilitation is considered in heritage management terms as a intervention typically involving the adding of a new heritage layer to enable a new sustainable use. It is not appropriate when the process necessitates the removal of previous historical layers, i.e. restoration of a building or place to the previous state/period. It is an appropriate heritage management action in the following cases:</p> <ul style="list-style-type: none"> - The heritage resource is degraded or in the process of degradation and would benefit from rehabilitation. - Where rehabilitation implies appropriate conservation interventions, i.e. adaptive reuse, repair and maintenance, consolidation and minimal loss of historical fabric. - Where the rehabilitation process will not result in a negative impact on the intrinsic value of the resource. <p>Enhancement</p> <p>Enhancement is appropriate where the overall heritage significance and its public appreciation value are improved. It does not imply creation of a condition that might never have occurred during the evolution of a place, e.g. the tendency to sanitize the past. This management action might result from the removal of previous layers where these layers are culturally of low significance and detract from the significance of the resource. It would be appropriate in a range of heritage contexts and applicable to a range of resources. In the case of formally protected or significant resources, appropriate enhancement action should be encouraged. Care should, however, be taken to ensure that the process does not have a negative impact on the character and context of the resource. It would thus have to be carefully monitored</p>
