EXIGENT ENGINEERING CONSULTANTS: PROPOSED SPITSKOP SOLAR PARK PROJECT ON PORTION 10 OF THE FARM WILDEBEESTLAAGTE 411 KQ, THABAZIMBI LOCAL MUNICIPALITY, LIMPOPO PROVINCE

Heritage Impact Assessment Report

Submitted subject to Section 38(3) and Section 38(8) of the NHRA

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HERITAGE IMPACT ASSESSMENT (HIA) ON PORTION 10 OF THE FARM WILDEBEESTLAAGTE 411 KQ FOR THE PROPOSED SPITSKOP SOLAR PARK PROJECT, THABAZIMBI LOCAL MUNICIPALITY, LIMPOPO PROVINCE

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DOCUMENT DISTRIBUTION LIST

Name	Institution
Jacolette Adam	Exigent Engineering Consultants

DOCUMENT HISTORY

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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 Spitskop Solar Park Project 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, EC-PHRA 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.

Disclosure of Vested Interest

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations.

Signature of specialist
Company: Exigo Sustainability
Date: 4 July 2022

This Archaeological Impact Assessment report has been compiled considering the National Environmental Management Act 1998 (NEMA) and Environmental Impact Regulations 2014 as amended, requirements for specialist reports, Appendix 6, as indicated in the NEMA Table below.

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report	Comment where not applicable.
1.(1) (a) (i) Details of the specialist who prepared the report	Page 4, Section 1.2 and Addendum 1 of Report.	-
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 1.2 and Addendum 1 of Report.	-
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page 4 of the report	-
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 1.3 and Section 1.4: Project Brief and Terms of Reference	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 4: Archaeo-Historical Context	-
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 9: Statement of Significance and Impact Rating	-
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3: Method of Enquiry	-
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3: Method of Enquiry	-
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 9: Statement of Significance and Impact Rating	-
(g) An identification of any areas to be avoided, including buffers	Section 5: Results Archaeological Survey	-
(h) A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Section 9: Statement of Significance and Impact Rating	-
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 3.2: Limitations and Constraints	-
(j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 9: Statement of Significance and Impact Rating	
(k) Any mitigation measures for inclusion in the EMPr	Section 6.3: Management Actions Section 7: Recommendations	
(l) Any conditions for inclusion in the environmental authorisation	N/A	None required
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 6.3: Management Actions Section 7: Recommendations	
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 & Section 7	
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and		
(n)(ii) If the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 6.3: Management Actions Section 7: Recommendations	-
(o) A description of any consultation process that was undertaken during the course of carrying out the study	N/A	Not applicable. A public consultation process will be conducted as part of the EIA and EMPr process.
(p) A summary and copies if any comments that were received during any consultation process	N/A	Not applicable.
(q) Any other information requested by the competent authority.	N/A	Not applicable.
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Section 1.5: CRM: Legislation, Conservation and Heritage Management	

EXECUTIVE SUMMARY

This report details the results of a Heritage Impact Assessment (HIA) in support of an Environmental Impact Assessment (EIA) process for the proposed Spitskop Solar Park Project on Portion 10 of the farm Wildebeestlaagte 411 KQ in the Thabazimbi Local Municipality of the Limpopo Province. Vulpecula Energy (Pty) Ltd. proposes the establishment of a renewable energy generation facility (Photovoltaic Solar Facility) over a total development area of approximately **190ha** with a generating capacity of 100MW on Wildebeestlaagte. Two site alternatives (a **Preferred Site** and an **Alternative Site**) were identified for the project. A Phase 1 HIA was conducted for the project by Hutten Heritage Consultants in 2011 as part of an Environmental Impact Assessment (EIA) which has since lapsed. The current HIA which is a reappraisal and update of the 2011 HIA, provides background information on the area's archaeology, history and sense of landscape and place in terms of its representation in Southern Africa. It also includes project methodologies and results as well as heritage legislation and conservation policies. A copy of the report will be supplied to the South African Heritage Resources Agency (SAHRA) and recommendations contained in this document will be reviewed.

Project Title	Spitskop Solar Park Project
Project Location	**Site (Preferred):** S24.959115° E27.238102° **Site (Alternative):** S24.969851° E27.255023°
1:50 000 Map Sheet	2427CC
Farm Portion / Parcel	Portion 10 of the farm Wildebeestlaagte 411 KQ
Magisterial District / Municipal Area	Thabazimbi Local Municipality
Province	Limpopo Province

The history of the eastern Limpopo Province and the Waterberg is reflected in an immensely rich archaeological landscape. The interaction between the climate, geology, topography, and the fauna and flora in the Waterberg Biosphere over millions of years has established a milieu in which prehistoric and historic communities thrived. Stone Age habitation occurs in places, mostly in open air locales or in sediments alongside rivers or pans. Bantu-speaking groups moved into this area during the last millennia and these groups, who practiced herding, agriculture, metal working and trading, found a suitable living environment during the Earlier, Middle and Later Iron Age. It was here that their chiefdoms flourished. European farmers, settling in the area since the middle of the 19th century, divided up the landscape into a number of farms. Historical trade routes were well established before the period of Colonial expansion and these routes mainly existed as a direct consequence of mining. During the nineteenth century the Highveld was extensively settled by both Bantu and European groups that migrated into this area and the landscape saw intensive conflicts and war events towards the end of the 19th century. In recent years an urban element developed, expanding at a rapid rate, largely as a result of farming development in the region.

The farm Wildebeestlaagte subject to this assessment was portioned towards the end of the 19th century and no particular reference to archaeological sites or features of heritage potential were recorded during an examination of literature thematically or geographically related to the properties. In addition, the 2011 HIA conducted by Hutten Heritage Consultants did not identify heritage resources, sites or finds of any value or significance in the Preferred Site. An examination of historical aerial imagery and archive maps indicate that the

larger landscape had been utilized for intensive agriculture during the last century and portions of Wildebeestlaagte, and the project areas have been altered and transformed in the last century. An archaeological site assessment was conducted of the Preferred Site but access could not be obtained onto the Alternative Site and this site was not included in the site walkover. During the survey, **no heritage receptors were noted on the Preferred Site** and it might be assumed that development at this site will result in a minimal (if any) impact on heritage resources. This inference is made subject to further on-site observations required during pre-construction vegetation clearing and earth moving activities. The following recommendations are made based on general observations in the proposed Spitskop Solar Park Project in terms of heritage resources management.

- The site survey for the Spitskop Solar Park Project excluded the Alternative Site due to access restrictions. Findings from the desktop assessment, indicating a sparse human settlement pattern and significant agriculture development during the last century, suggest a low heritage potential for this site. However, undetected heritage receptors might be present at the Alternative Site and a detailed site walkover of this site should be conducted by a heritage specialist should this site be considered for development.
- The site survey of the Preferred Site was constrained due to dense vegetation and frequent site monitoring of the initial stages of the project (vegetation clearing, earth moving and excavations) by an informed Environmental Control Officer (ECO) is recommended. 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 should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the project landscape 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.

No heritage resources were documented in the Spitskop Solar Park Project Preferred Site and it is the opinion of the author of this Archaeological Impact Assessment Report that the proposed project will not impact on sensitive heritage resources should the Preferred Site be selected for development. The development of the Preferred Site may proceed from a culture resources management perspective, provided that no previously undetected heritage remains are encountered during any phase of development.

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

Impact: A description of the effect of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.

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.

Scoping Assessment: The process of determining the spatial and temporal boundaries (i.e. extent) and key issues to be addressed in an impact assessment. The main purpose is to focus the impact assessment on a manageable number of important questions on which decision making is expected to focus and to ensure that only key issues and reasonable alternatives are examined. The outcome of the scoping process is a Scoping Report that includes issues raised during the scoping process, appropriate responses and, where required, terms of reference for specialist involvement.

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.

Trigger: A particular characteristic of either the receiving environment or the proposed project which indicates that there is likely to be an *issue* and/or potentially significant *impact* associated with that proposed development that may require specialist input. Legal requirements of existing and future legislation may also trigger the need for specialist involvement.

LIST OF ABBREVIATIONS

Abbreviation	Description
ASAPA	Association for South African Professional Archaeologists
AIA	Archaeological Impact Assessment
BP	Before Present
BCE	Before Common Era
BGG	Burial Grounds and Graves
CRM	Culture Resources Management
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)
MRA	Mining Right Area
MSA	Middle Stone Age
NHRA	National Heritage Resources Act No.25 of 1999, Section 35
PFS	Pre-Feasibility Study
PHRA	Provincial Heritage Resources Authorities
SAFA	Society for Africanist Archaeologists
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 (Pty) Ltd (Exigo) was commissioned by Exigent Engineering Consultants to conduct a Heritage Impact Assessment (HIA) study in support of an Environmental Impact Assessment (EIA) process for the proposed Spitskop Solar Park Project in the Limpopo Province. The rationale of this HIA is to determine the presence of heritage resources such as archaeological and historical sites and features, graves and places of religious and cultural significance as well as palaeontological features 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's expertise ensures that all projects be conducted to the highest international ethical and professional standards. As archaeological specialist for Exigo Sustainability, Mr Neels 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

Vulpecula Energy (Pty) Ltd is proposing the establishment of a solar energy generation facility with associated infrastructure and structures on Portion 10 of the farm Wildebeestlaagte 411 KQ, located within the Thabazimbi Local Municipality, Waterberg District Municipality, Limpopo Province. Exigent Engineering Consultants was appointed to oversee the legislative environmental processes applicable to the proposed project (hereafter referred to as the "Spitskop Solar Park Project" or "the project").

The PV Power Plant will have a maximum generating capacity of up to 75 MW. The proposed Spitskop Solar Park will deliver the electrical energy to the Eskom Spitskop substation through a new 88 kV (or 132kV) power line of approximately 1.6 km in length. An 88 kV (or 132 kV) feeder bay will be commissioned and equipped at the Eskom Spitskop substation. The chosen site is suitable for the installation of a photovoltaic (PV) power plant. It is appropriate morphologically (flat terrain) and regarding the favourable radiation conditions. The available radiation allows a high rate of electric energy production, as a combination of latitude - longitude and climatic conditions. Two site alternatives (a Preferred Site and an Alternative Site) were identified for the project but the site survey for the Spitskop Solar Park Project excluded the Alternative Site due to access restrictions.

A Phase 1 Heritage Impact Assessment (HIA) was conducted for the project by Hutten Heritage Consultants[1] in 2011 as part of an Environmental Impact Assessment (EIA) which has since lapsed. This assessment is a reappraisal and update of the 2011 HIA conducted for the project (see Section 5.1.1).

[1] Hutten, M. 2011. Heritage Impact Assessment for the Proposed Spitskop Solar Park west of Northam, Limpopo Province. Hutten Heritage Consultants

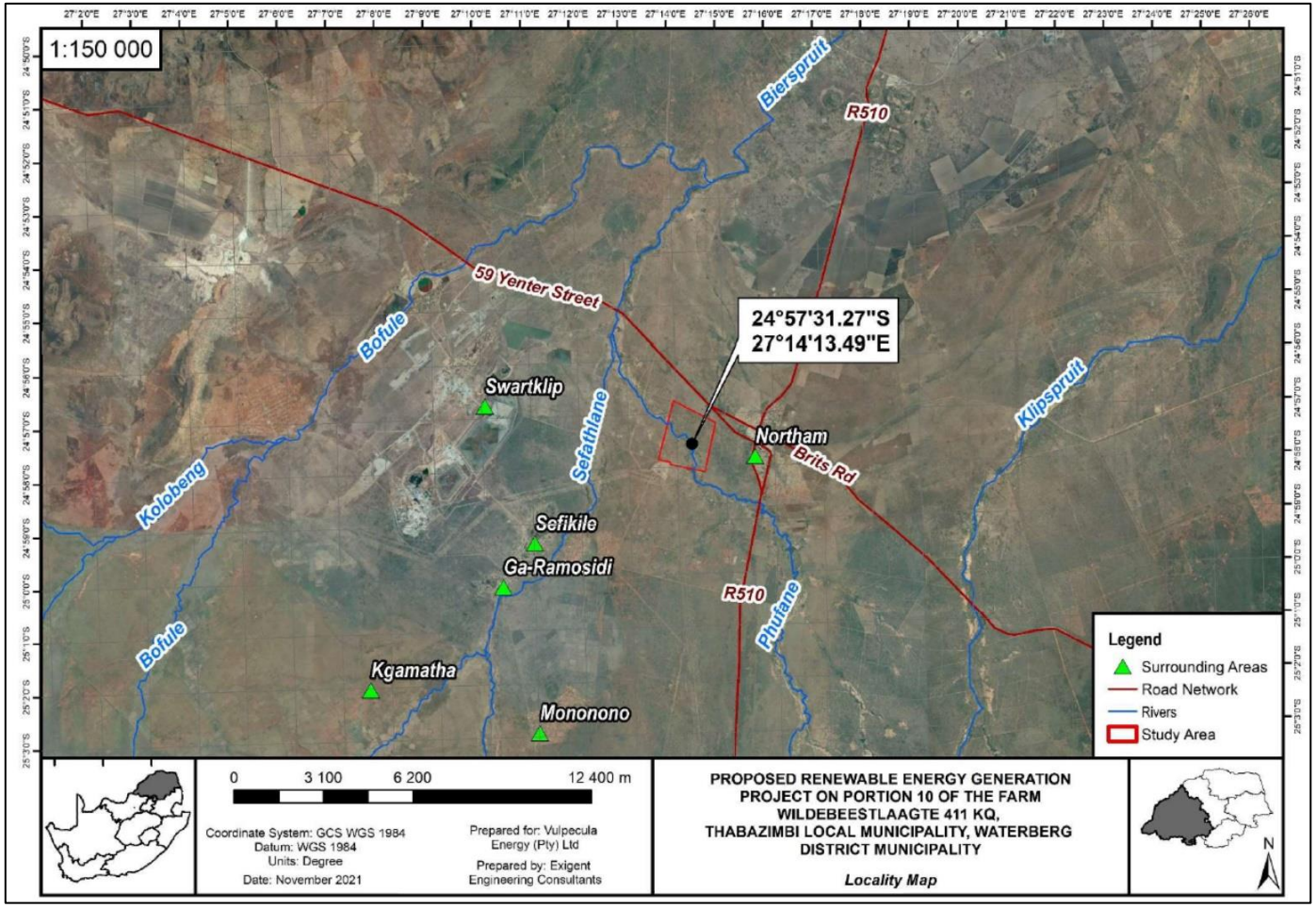


Figure 1-1: Aerial map indicating the location of the proposed Spitskop Solar Park Project.

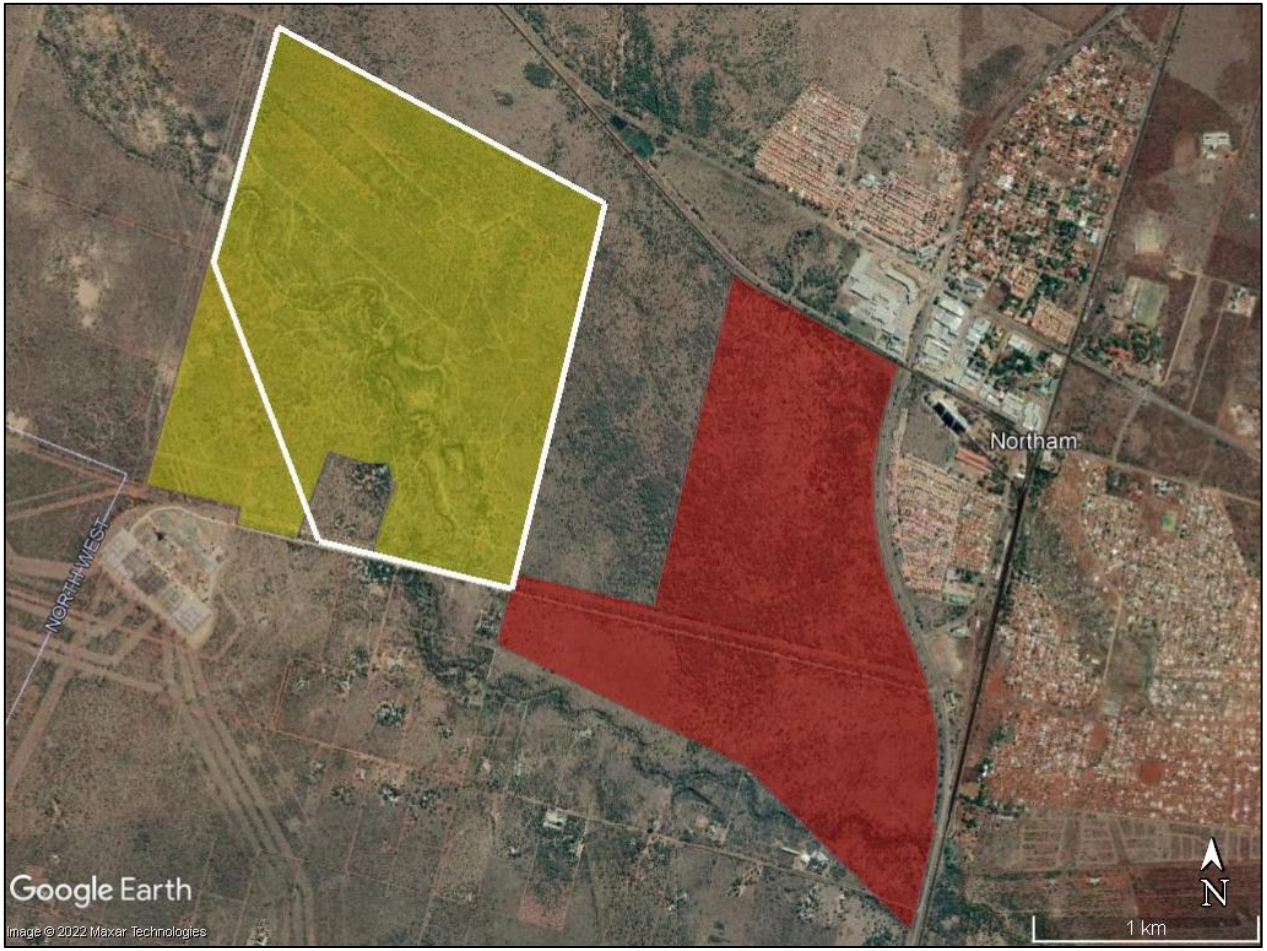


Figure 1-2: Extent of the proposed Spitskop Solar Project: the preferred site is shaded in yellow, the alternative site is shaded in red and the site assessed by Hutten in 2011 is indicated by the white outline.

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. It is also a legal requirement for certain development categories which may have an impact on heritage resources. 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 as well as paleontological receptors 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). A Notification of Intent to Develop (NID) will be submitted to SAHRA at the soonest opportunity.*

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 artefacts, structures and sites older than 100 years

b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography

c. Objects of decorative and visual arts

d. Military objects, structures and sites older than 75 years

e. Historical objects, structures and sites older than 60 years

f. Proclaimed heritage sites

g. Grave yards and graves older than 60 years

h. Meteorites and fossils

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 sites

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.

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 proposed Spitskop Solar Park Project is located on Portion 10 of the farm Wildebeestlaagte 411 KQ in the Thabazimbi Local Municipality, Limpopo Province. The proposed project is situated 2.5km west of Northam, and east of the Eskom Spitskop substation. The site lies south Swartklip Road which connects the town of Northam to Swartklip. The study areas appear on 1:50000 map sheet 2426DD (see Figure 2-1) and key location points for the project are:

- **Site (Preferred): S24.959115° E27.238102°**
- **Site (Alternative): S24.969851° E27.255023°**

2.2 Area Description: Receiving Environment

The farm Wildebeestlaagte 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 a drainage channel, the Phufane River bisecting the area from east to west. The topography across the site is slightly undulating. The proposed development will assumedly not utilise areas along the stream which is included in the 1/100-year flood line of the stream.

2.3 Site Description

Large sections of the Preferred Site to the north have been transformed by past agricultural activity. The fields in these areas have been cleared and ripped for agricultural purposes but the property was only used as a game farm in recent years and this resulted in the re-growth of the ploughed areas. The central portion along the Phufane River, areas to the south of the Preferred Site as well as much of the Alternative Site are more pristine with dense surface vegetation. Several power lines and proposed power lines cross the south-western corner of the property and no development will take place in this area and it was thus excluded from the study. The current land-use of the proposed development site and neighboring farms is game farming with mining further away from the site. Existing infrastructure comprises an extensive network of internal farm roads, several dams/water holes, concrete drinking troughs, feeding bins and a residence and recreational bush camp.

The chosen site is suitable for the installation of a photovoltaic (PV) power plant. It is appropriate morphologically (flat terrain) and regarding the favorable radiation conditions. The available radiation allows a high rate of electric energy production, as a combination of latitude-longitude and climatic conditions.

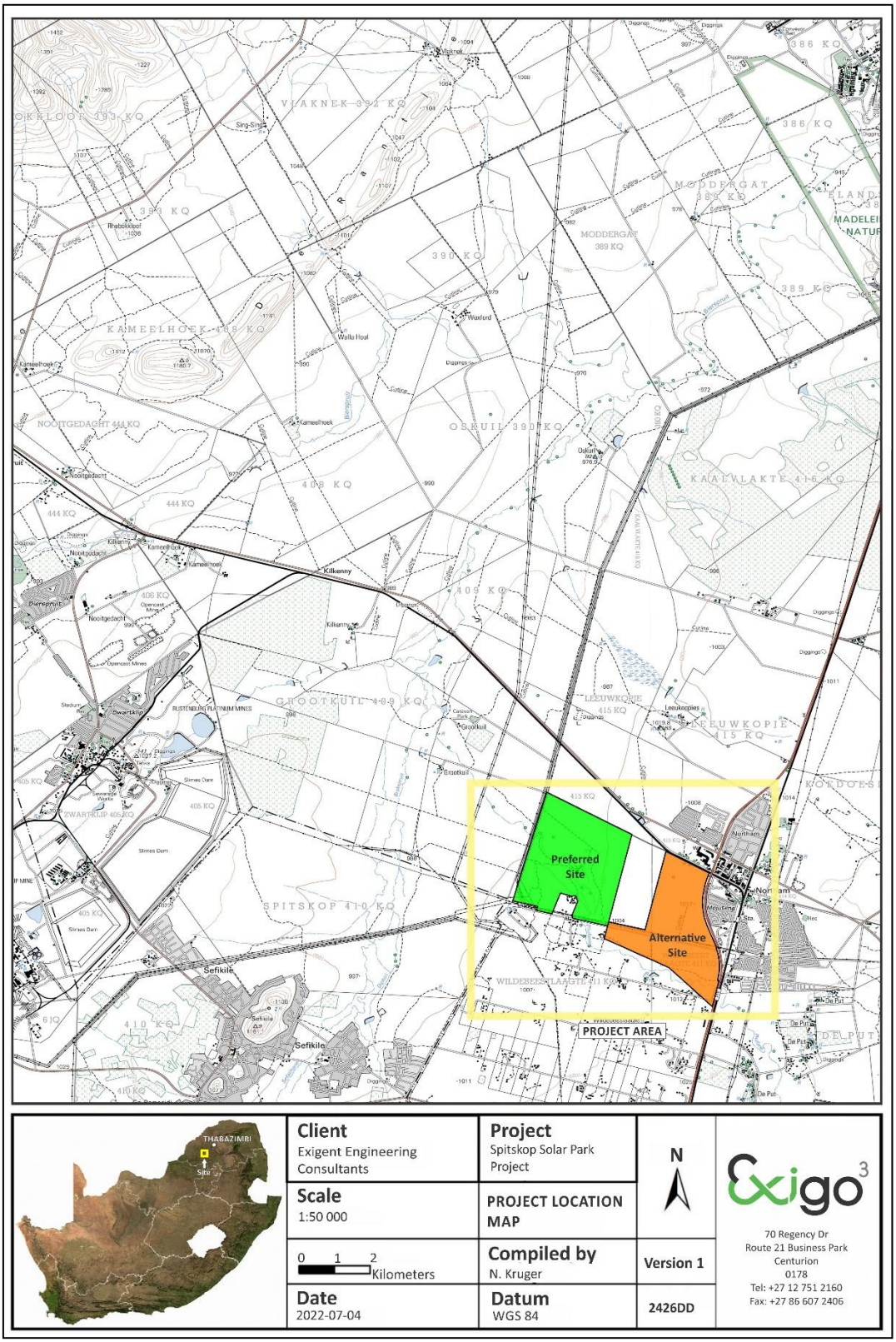


Figure 2-1: 1:50 00 Map representation of the location of the proposed Spitskop Solar Park Project (sheet 2426DD).

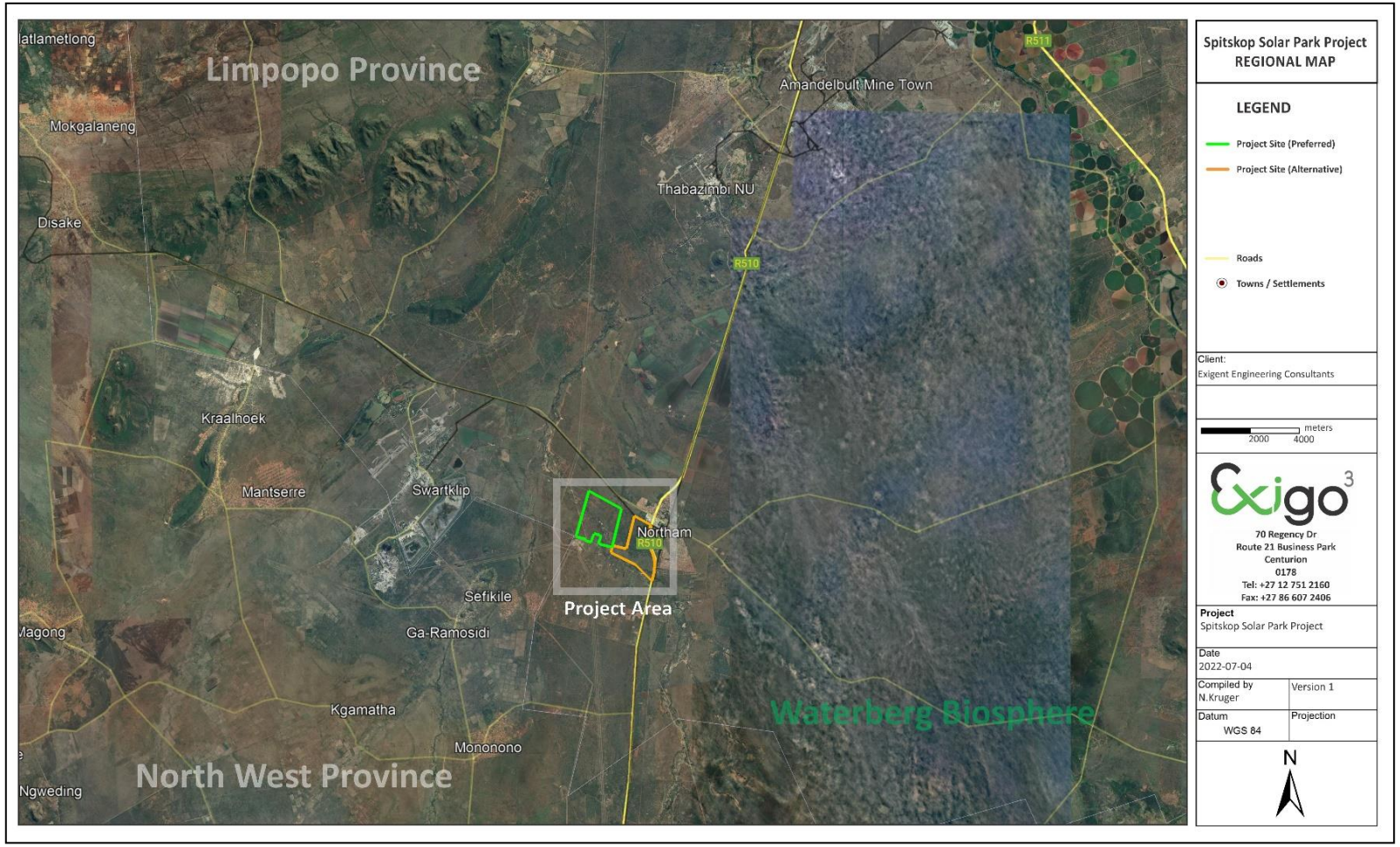


Figure 2-2: Aerial map providing a regional context for the proposed Spitskop Solar Park Project.

3 THE PROJECT HERITAGE LANDSCAPE

3.1 The Archaeological Landscape

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: *Australopithecines* *Homo habilis* *Homo erectus*	Typically large stone tools such as hand axes, choppers and cleavers.
Middle Stone Age 250 000 – 25 000 YCE	Pleistocene	First *Homo sapiens* species	Typically smaller stone tools such as scrapers, blades and points.
Late Stone Age 20 000 BC – present	Pleistocene / Holocene	*Homo sapiens sapiens* 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 **(commonly restricted to the interior and north-east coastal areas of Southern Africa)**	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 **(commonly restricted to the interior and north-east coastal areas of Southern Africa)**	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 **(commonly restricted to the interior and north-east coastal areas of Southern Africa)**	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.

3.2 Discussion: The Waterberg Heritage Landscape

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 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 Olieboomspoort 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). Diamant 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 inmoving 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).

3.2.1 Early History and the Stone Ages

According to archaeological research, the earliest ancestors of modern humans emerged some two to three million years ago. The remains of Australopithecine and *Homo habilis* have been found in dolomite caves and underground dwellings in the Riverton Area at places such as Sterkfontein and Swartkrans near Krugersdorp. Homo habilis, one of the Early Stone Age hominids, is associated with Oldowan artefacts, which include crude implements manufactured from large pebbles. The Acheulian industrial complex replaced the Oldowan industrial complex during the Early Stone Age. This phase of human existence was widely distributed across South Africa and is associated with *Homo erectus*, who manufactured hand axes and cleavers from as early as one and a half million years ago. Middle Stone Age sites dating from as early as two hundred thousand years ago have been found all over South Africa. Middle Stone Age hunter-gatherer bands also lived and hunted in the Orange and Vaal River valleys. These people, who probably looked like modern humans, occupied campsites near water but also used caves as dwellings. They manufactured a wide range of stone tools, including blades and point s that may have had long wooden sticks as hafts and were used as spears. Excavations at Makapansgat near to Mokopane provided evidence of occupation by Australopithecus africanus from approximately 3.3 million years ago. There is evidence of long occupation from the Cave of Hearths with stone tools and associated debris from a date of 400,000 B.P while upper strata are characterised by Middle Stone Age assemblages of 110,000 to 50,000 B.P. and Late Stone Age assemblages dating from 10,000 to 5,000 years B.P. characterised by the Smithfield B industry. The site is one of the few to exhibit Acheulean assemblages in Southern Africa and also contains overlying Middle Stone Age Howiessonspoort industry tools and early evidence of fire use (Bergh, 1999; Mitchell, 2002). Both ESA and MSA sites are known from the Limpopo Valley as well as lithic industries that appear to be transitional between the two ages and with dates estimated at 300,000 years ago (Kuman et al. 2005).The presence of numerous rock art sites with associated stone tool assemblages in the Limpopo River basin, Blouberg, Makgabeng, Waterberg and Soutpansberg attests to the presence of Late Stone Age San/Bushman communities across the region (e.g. Pager, 1973: Eastwood et al., 2002). The Central Limpopo Basin, including the Soutpansberg, Limpopo Valley, the Blouberg-Makgabeng area and the Pafuri area, has over 700 documented rock art sites and is one of the few regions where paintings and engravings occur, sometimes at the same site (Eastwood and Hanisch 2003).

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 Olieboomspoort 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 form 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.

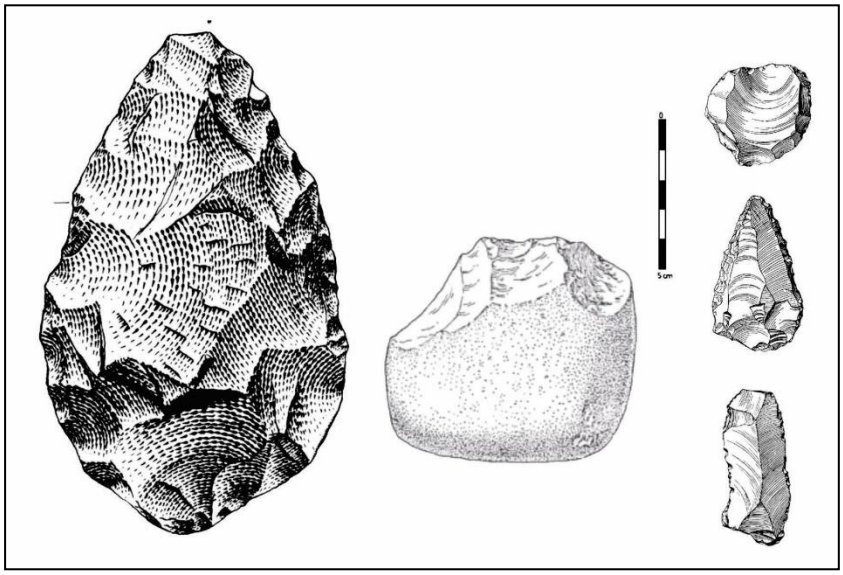


Figure 3-1: Typical ESA handaxe (left) and cleaver (center). To the right is a MSA scraper (right, top), point (right, middle) and blade (right, bottom).

3.2.2 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.

3.2.3 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.

3.2.4 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. The Iron Age can be divided into three phases. The Early Iron Age includes the majority of the first millennium A.D. and is characterised by traditions such as Happy Rest and Silver Leaves. The Middle Iron Age spans the 10th to the 13th Centuries A.D. and includes such well known cultures as those at K2 and Mapungubwe. The Late Iron Age is taken to stretch from the 14th Century up to the colonial period and includes traditions such as Icon and Letaba.

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.

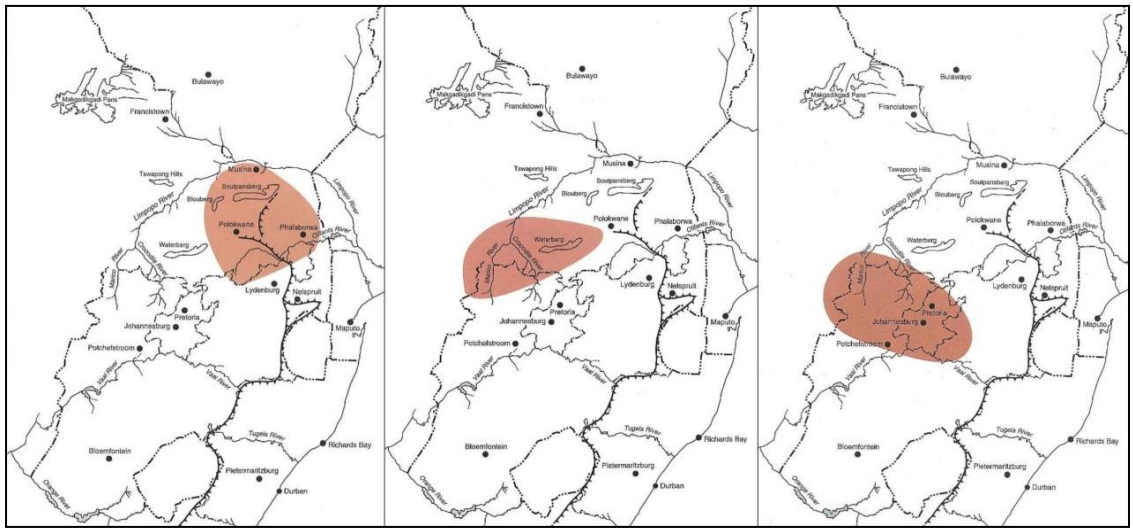


Figure 3-2: Map detailing the distribution of 16th century Maloko (left), 17th century Madikwe (centre) and 18th century Buispoort tradition sites (After Huffman 2007).

Figure 3-3: 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.

3.2.5 Archaeo-Metallurgy and Prehistoric Mining

Africa is fortunate as its general geology is such that iron deposits exist almost everywhere in some level of mine-able ore - from solid nuggets of hematite to iron ore dust or clays rich in iron. In South Africa, the Later Iron Age is characterised by a greater degree of economic specialisation where villages were no longer self-sufficient units; instead, there was greater regional interdependency and more emphasis on trade. Iron smelting activities no longer occurred on most sites; instead, there were a number of main centres which specialised in the mining and production of iron. Phalaborwa in the Limpopo Province was one of the most important iron and copper production centres. Iron was used mainly to manufacture hoes, knife-blades, axes, spears, adzes, awls and metalworking tools. In addition, it also acted as currency and bridal wealth (lobola) as well as fulfilling ceremonial and political functions.

Copper production was even more restricted and there is little evidence of copper-working south of the Vaal and the Nkomati Rivers. Copper and bronze were used to manufacture ornaments such as beads, earrings and arm bangles. Tin was mined at Rooiberg near Warmbaths/Bela-Bela in the Limpopo Province, while gold objects, particularly beads, were recovered from a few sites such as Mapungubwe and Machemma in the Limpopo Province and Thulamela in the Kruger National Park. Metal products were important trade items during the Late Iron Age. Furnaces were usually constructed in an oval shape with at least two vents that held the tuyères or blowpipes that were attached to bellows. Grass, charcoal and wood was used to reach temperatures of up to 1500ºC inside the furnace, sufficient to reduce iron ore to iron.

The role of metallurgy in the cultural life ways of metal workers in Africa is sophisticated and includes much more than just the practical value associated with metals. In unstratified societies metal smiths were free independent agents and part-time specialists that conserved their knowledge. In some instances smaller clans or settlements had their own metal smiths. Metal smiths were respected and did not easily share knowledge of the practise but they sometimes would employ helpers such as bellow operators. In stratified societies metal smiths were not independent and they had to pay dues to a chief or king. With the

appearance of large states in Africa, metal smiths were permanently hired by royalty in order to perform iron smelting practices.

Iron smelting was almost without exception, a highly ritualised activity with a deep symbolic meaning. Communication and consent from the ancestors was crucial in order to successfully reduce iron ore. It was also believed that the furnaces and the iron smelting area had to be purified and that certain aspects would render it unclean.

The implication of the ritual association with iron smelting was that:

- the iron smelting areas were positioned outside settlement areas and usually out of line of sight of the villages and villagers. In many cases these areas were situated behind hills or kopjes.
- the metal smiths had to seclude themselves during the time of iron reduction. They had to abstain from sexual activities and they were not to come into contact with menstruating women ("unclean women").

The iron smiths were supplied with food by young girls or older women. Any woman biologically capable of menstruation had to keep away from the activities.

3.2.6 Later History: Reorganization, Colonial Contact and living heritage.

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. However, farming communities have settled in the landscape at the beginning of the 20th century.

4 METHODOLOGY

4.1 Sources of Information

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

4.1.1 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 project area 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, Lephalale Local Municipality, Waterberg District, Limpopo Province. Client: Flexilor Properties (Pty) Ltd . PGS Heritage Consultants.
- Pelser, A.J. & Van Vollenhoven, A.C. 2010. Final Report on the Results of the Cultural Heritage Walkdown for the Final EMP for the Dinaledi-Spitskop 440Kv Eskom Power Line between Brits and Northam. (Unpublished report, Pretoria)
- Pistorius, J.C.C. 2009. A Cultural Heritage Assessment for Eskom's Proposed New Power Line Between the Spitskop Substation and the Union Plats Substation in the Limpopo. (Unpublished report, Lynnwood)
- Pistorius, J.C.C. 2007. A Phase 1 Heritage Impact Assessment (HIA) Study for Eskom's Proposed new 400Kv Power line Route between the Matimba B Powerstation and the Marang Substation near Rustenburg. (Unpublished report, Lynnwood)
- 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.

For the project, the following HIA Report was completed as part of a previous Environmental Authorization Process which has since lapsed:

- Hutten, M. 2011. Heritage Impact Assessment for the Proposed Spitskop Solar Park west of Northam, Limpopo Province. Hutten Heritage Consultants.

4.1.2 Aerial Survey

Aerial photography is often employed to locate and study archaeological sites, particularly where larger scale area surveys are performed. The site assessment of the project area relied heavily on this method to assist the site survey. Here, depressions, variation in vegetation, soil marks and landmarks were examined and 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. In addition, historical aerial photos obtained during the archival search were scrutinized and features that were regarded as important in terms of heritage value were identified and if they were located within the boundaries of the project area, they were physically visited in an effort to determine whether they still exist and in order to assess their current condition and significance. By superimposing high frequency aerial photographs with images generated with Google Earth as well as historical aerial imagery, potential sensitive areas were subsequently identified, geo-referenced and transferred to a handheld GPS device. These areas served as reference points from where further surveys were carried out.

4.1.3 Mapping of sites

Similar to the aerial survey, the site assessment of the project area relied heavily on archive and more recent map renderings of Wildebeestlaagte to assist the challenging foot survey where historical and current maps of the project area were examined. By merging data obtained from the desktop study and the aerial survey, sites and areas of possible heritage potential were plotted on these maps of the larger Waterberg region using GIS software. These maps were then superimposed on high-definition aerial representations in order to graphically demonstrate the geographical locations and distribution of potentially sensitive landscapes.

4.1.4 Field Survey

Archaeological survey implies the systematic procedure of the identification of archaeological sites. The archaeological survey for the Preferred Site for the Spitskop Solar Park was conducted in June 2022. The Alternative Site was not surveyed due to access restrictions. The process encompassed a random field survey in accordance with standard archaeological practice by which heritage resources are observed and documented. Particular focus was placed on GPS reference points identified during the aerial and mapping survey. Where possible, random spot checks were made and potentially sensitive heritage areas were investigated. Using a Garmin GPS, the survey was tracked and general surroundings were photographed with a Samsung Digital camera. Real time aerial orientation, by means of a mobile Google Earth application was also employed to investigate possible disturbed areas during the survey.

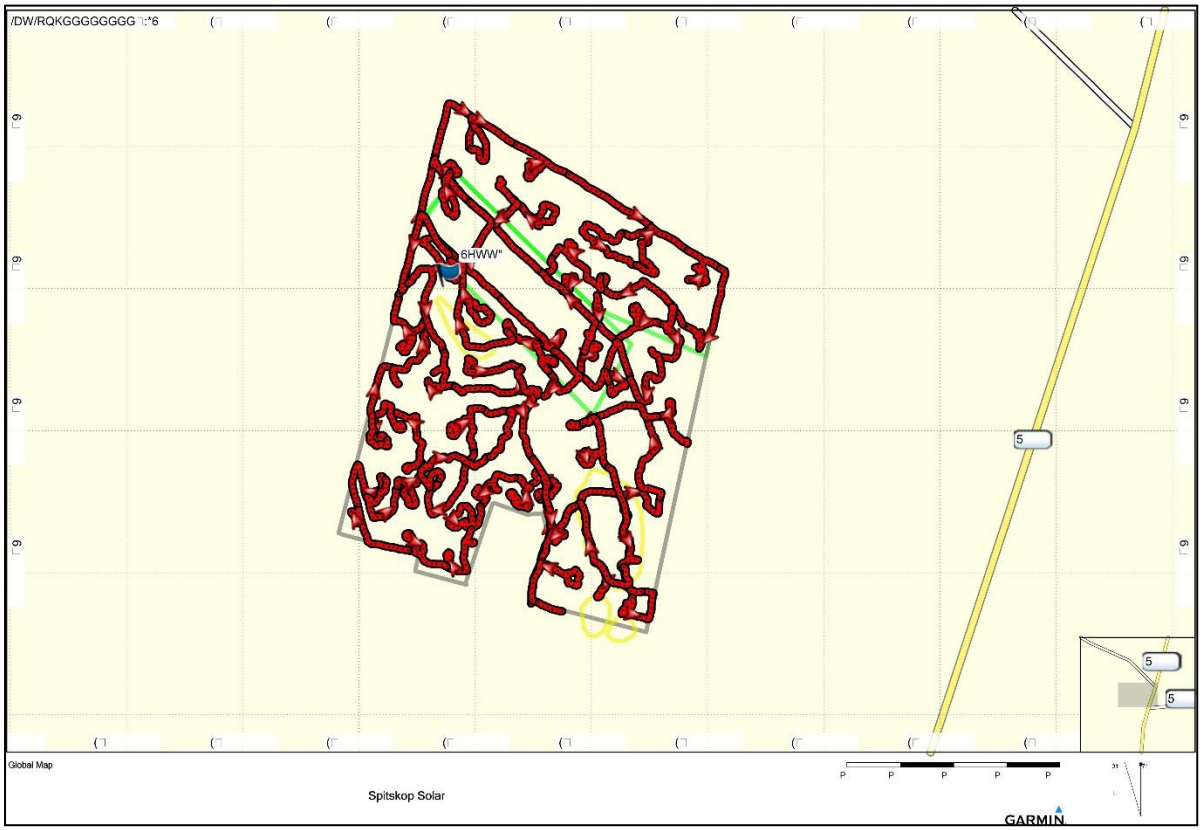


Figure 4-1: Map indicating the GPS Track log for the site survey (red lines). The Preferred Site is indicated by the grey polygon, disused agricultural fields identified from aerial maps and photographs are indicated by the green polygons and yellow polygons indicate potential human activity areas

4.1.5 General Public Liaison

Consultation with the owner of the property did not identify any heritage receptors in the project area.

4.2 Limitations and Constraints

The site survey for the Spitskop Solar Park Project AIA primarily focused around areas tentatively identified as sensitive and of high heritage probability (i.e. those noted during the mapping and aerial survey) as well as areas of potential high human settlement catchment. In terms of on-site limitations during the survey, the following should be noted:

- The project area is accessed via a local road connecting to the R510. Access control onto the Preferred Site was arranged with the owner and an extensive network of internal farm roads enabled adequate movement in this survey area.
- The site survey excluded the Alternative Site due to access restrictions onto this area.
- The surrounding vegetation in the project area is mostly comprised out of trees, mixed grasslands riparian vegetation and disused farmlands vegetated by pioneering plant species. The general visibility at the time of the AIA survey (June 2022) ranged from high in transformed areas to low in more pristine surroundings which restricted and some archaeological observations on site.

Cognisant of the constraints noted above, 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. In addition, undetected heritage receptors might be present at the Alternative Site and a detailed site walkover of this site should be conducted by a heritage specialist should this site be

considered for development. 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.

Figure 4-2: View of grassland vegetation and trees (left) and a farmhouse (right) in the project area (Preferred Site) .

Figure 4-3: View of tall grasses and deep red sands in the project area (Preferred Site).

Figure 4-4: View of general surroundings and an ESKOM powerline (right) in the project area (Preferred Site).

Figure 4-5: View of a livestock enclosure (left) and dense surface vegetation (right) in the project area (Preferred Site).

Figure 4-6: View of a dam wall Left) and the Phufane River (right) in the project area (Preferred Site).

4.3 Impact Assessment

For consistency among specialists, impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES[2], for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. Please refer to Section 6 and Addendum 2.

[2] CES Risk Assessment Methodologies Internal guideline document, 2019

5 RESULTS: AIA

5.1 Anticipated Archaeology

5.1.1 The Off-Site Desktop Survey

In terms of heritage resources, the general landscape around the project area is primarily well known for its Iron Age Farmer and Colonial / Historical Period archaeology related to farming, rural expansion and warfare of the past century. No particular reference to archaeological sites or features of heritage potential were recorded during an examination of published literature thematically or geographically related to the Wildebeestlaagte properties.

An analysis of historical aerial imagery and archive maps reveals the following (see Figure 5-1 to Figure 5-6):

- The farm Wildebeestlaagte is indicated on an early map of the Transvaal (Jeppe, 1899).
- The original title deed for the farm Wildebeestlaagte indicated that the property was surveyed in 1893 and registered to the estate of A H. Nellmapius.
- The Hutten Heritage Consultants HIA for the Proposed Spitskop Solar Park (Hutten, 2011) did not identify heritage resources, sites or finds of any value or significance in the Preferred Site. The study notes the presence of damaged stone walled sites and a graveyard along the base of Sefikile hill at Sefikile village approximately 2-3km to the south-west of the study area. These sites will not be affected by the proposed development of the Solar Park.
- Historical farming and agriculture lands are indicated on topographic maps of the project area dating to 1964 and 1980. No buildings and man-made structures appear on these maps within the project area.
- A dam, agricultural lands and buildings are indicated on a 2004 map of the project surroundings. A network of internal roads is also indicated on these maps.
- Aerial imagery dating to 1954 indicate that northern portions of the Wildebeestlaagte property - and particularly areas subject to this assessment - have been altered extensively by historical farming and agriculture. Possible human settlement areas and a dam are also indicated on this image.
- Van Warmelo (1935) indicates a number of BaSeleka and Bakgatla groups residing in and around Northam and the project area in 1935.

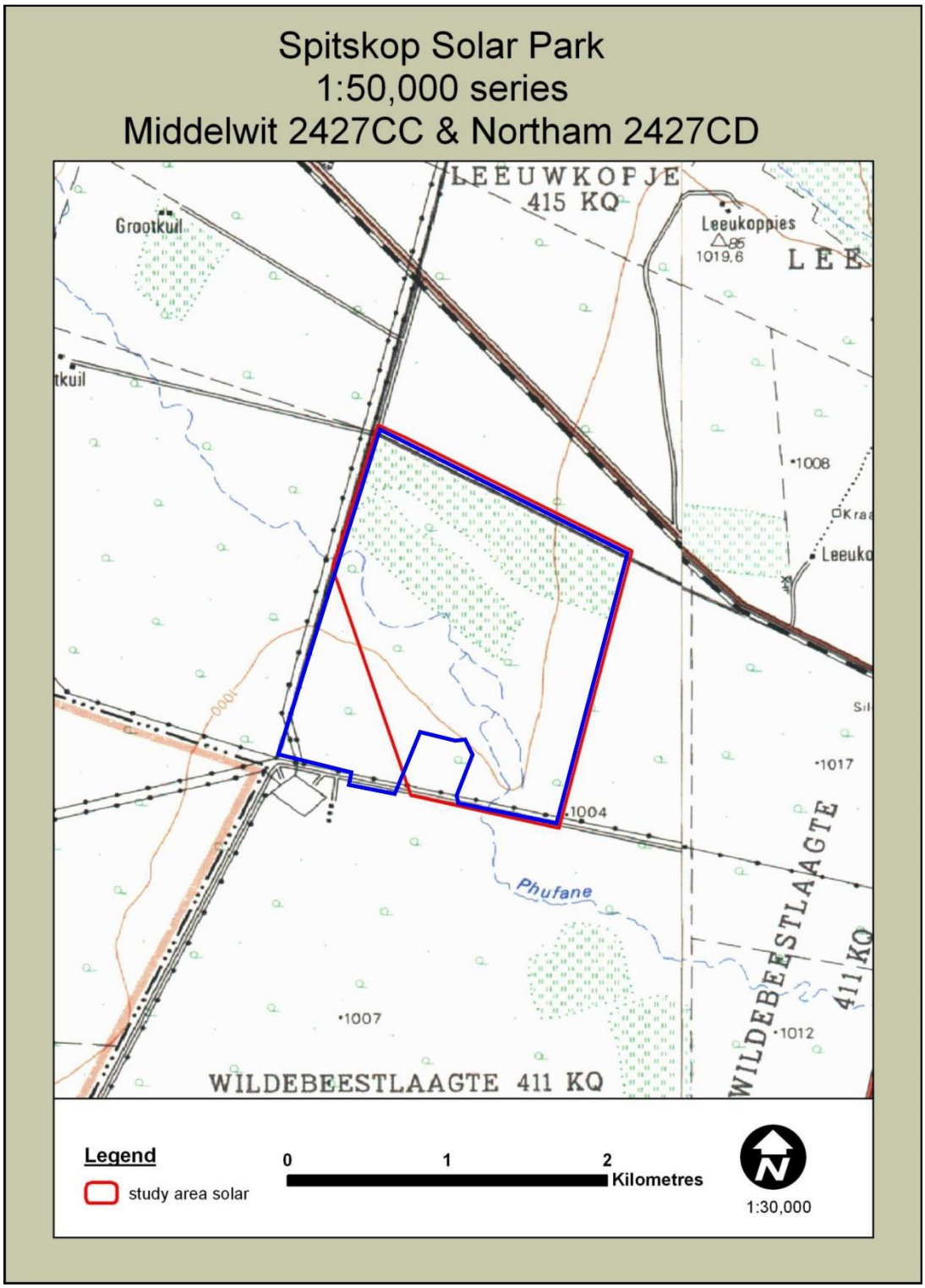


Figure 5-1: Map of the 2011 HIA survey area by Hutten, indicated in red. The survey area subject to the current assessment (Preferred Site) is indicated in blue.

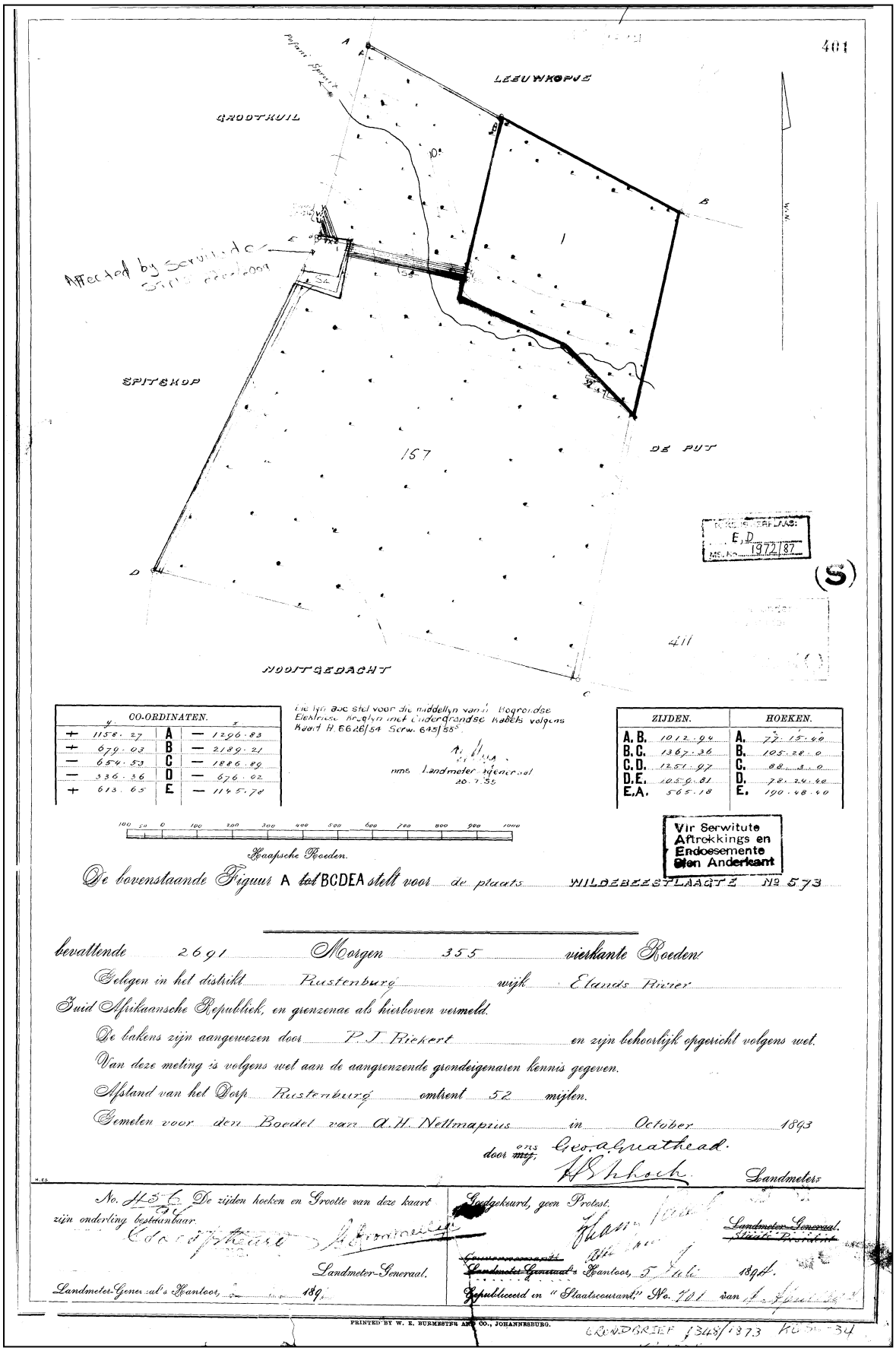


Figure 5-2: The original title deed for the farm Wildebeestlaagte dating to 1893.

Figure 5-3: Historical map of the western Waterberg region dating to 1899 (Jeppe) indicating the presence of the farm Wildebeestlaagte (yellow outline).

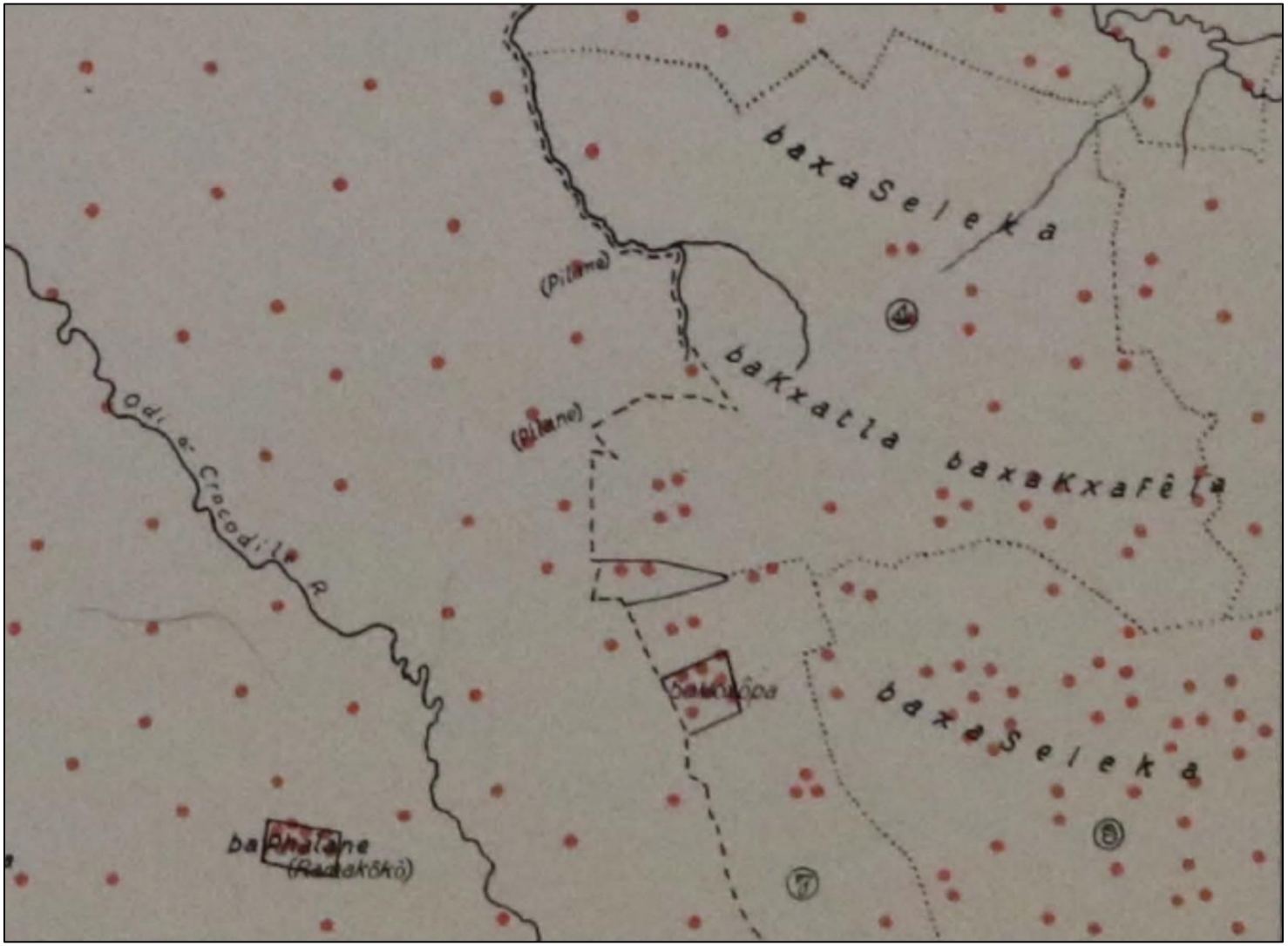
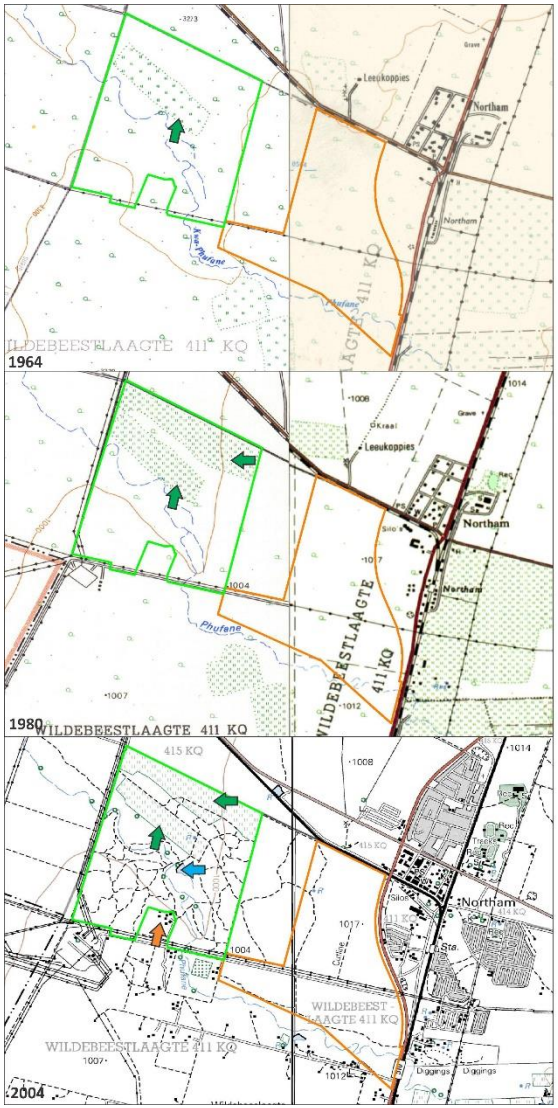


Figure 5-4: An excerpt of Van Warmelo's Map of the project landscape dating to 1935. Each red dot represents "10 taxpayers". Note that the project area was relatively sparsely populated by BaSeleka and Bakgatla groups at the time.



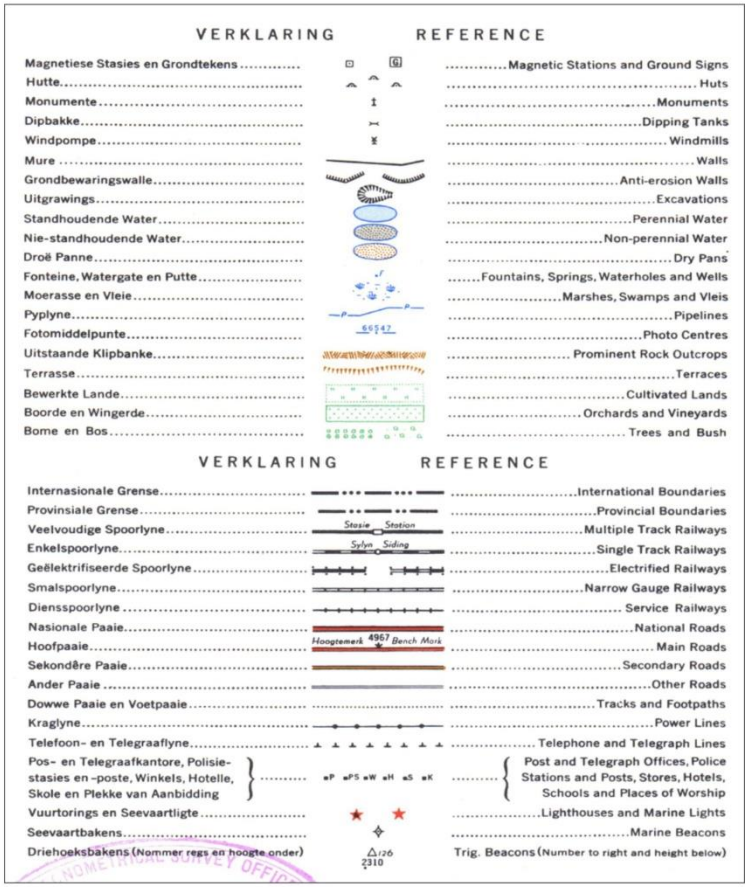


Figure 5-5: Historical topographic maps of Wildebeestlaagte indicating the locations of the preferred development site (orange outlines) as well as the alternative site option (orange outline) in the past decades. Green arrows point to cultivated lands, the blue arrows indicate a dam and orange arrows indicate a farmhouse.

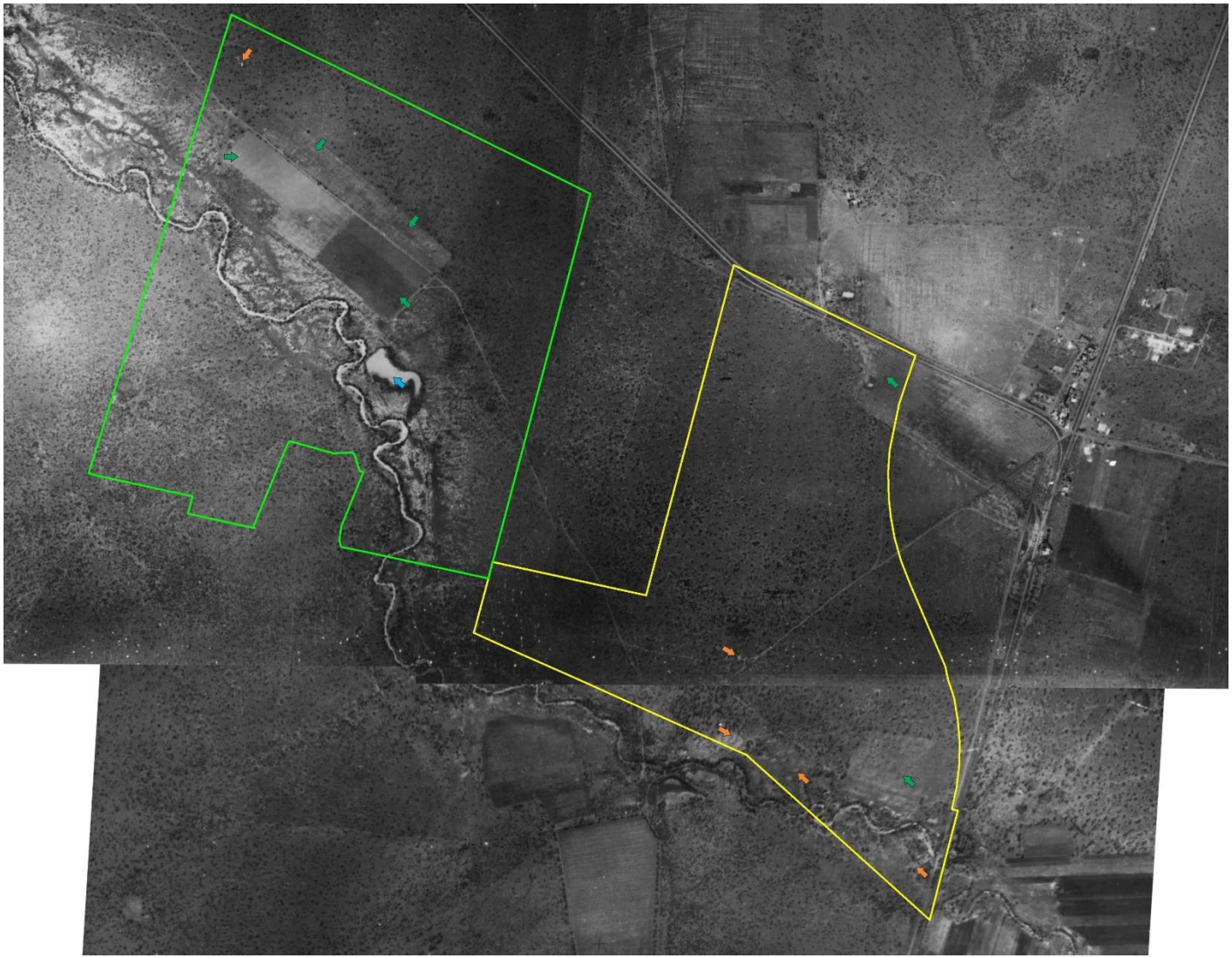


Figure 5-6: A historical aerial image of the Preferred Site (green outline) and the Alternative Site (yellow outline) dating to 1954. The presence of extensive agriculture activities (green arrows), a dam (blue arrow) and potential man-made structures or features of heritage potential (orange arrows) are indicated.

5.1.2 The Archaeological Site Survey

An analysis of historical aerial imagery and archive maps of areas subject to this assessment suggests a landscape which has been subjected to historical farming activities possibly sterilising the area of heritage remains. This inference was confirmed during an archaeological site assessment during which no *in situ* heritage remains were encountered within the boundaries of the **Preferred Site**. The following observations were made during the site survey:

- **The Stone Age**

Stone Age material generally occurs along drainage lines and exposed surfaces in the landscape. During the site survey no Stone Age occurrences were documented in the proposed project **Preferred Site**.

- **The Iron Age Farmer Period**

A frontier zone between the east and the west, the Western Limpopo landscape holds vast amounts of Iron Age (Farmer period) remnants but no Farmer Period occurrences were noted in the proposed project **Preferred Site**.

- **Historical / Colonial Period and recent times**

Northam and its surroundings have a long and extensive Colonial Period settlement history. From around the first half of the 19th century, the area was frequented by explorers, missionaries and farmers who all contributed to a recent history of contact and conflict. The remnants of recent occupation and mining are scattered across the landscape but no Historical / Colonial Period occurrences were observed in the proposed project **Preferred Site**. In terms of the built environment, the project area has no significance, as there are no old buildings, structures, or features, old equipment, public memorial or monuments in the footprint areas.

- **Graves**

No graves of human burial places were noted during the site investigation of the proposed project **Preferred Site**. In the rural areas of the Limpopo Province graves and cemeteries often occur within settlements or around homesteads but they are also randomly scattered around archaeological and historical settlements. The probability of informal human burials encountered during development should thus not be excluded. 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.

6 RESULTS: STATEMENT OF SIGNIFICANCE AND IMPACT RATING

6.1 Potential Impacts and Significance Ratings[3]

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 Addendum 3.

6.2 General assessment of impacts on heritage 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, of 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.

6.2.1 Issues Identification Matrix

As noted previously, impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES, for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. Please refer to Addendum 2.

The following tables summarize impacts to heritage receptors for the proposed Spitskop Solar Park Project.

[3] Based on: W inter, S. & Baumann, N. 2005. *Guideline for involving heritage specialists in EIA processes: Edition 1.*

Impact Assessment Preferred Site: Archaeology

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Construction phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Operation phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Decommissioning phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment Preferred Site: Built Environment

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Construction phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Operation phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Decommissioning phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment Preferred Site: Cultural Landscape

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Construction phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Operation phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Decommissioning phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment Preferred Site: Human Burial Sites

Criteria	Nature	Temporal Scale	Spatial Scale	Severity	Probability	Overall Significance before mitigation	Reversibility	Irreplaceable Loss	Mitigation Potential	Overall Significance after mitigation
Impact 1: Loss of Heritage Resources										
Construction phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Operation phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
Decommissioning phase	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Previous studies conducted in the Western Limpopo Province and the Waterberg suggest a rich and diverse archaeological landscape. Generally, the area is highly suitable for pre-colonial habitation and, even though the project area contains no visible tangible heritage remains, the probability of exposing archaeological remains that might be present in surface and sub-surface deposits along drainage lines and in pristine areas during development should not be excluded.

6.2.2 Archaeology

Neither the Hutten (2011) study nor this study identified any archaeological receptors in the Preferred Site which will be directly impacted by the proposed project and no impact on archaeological sites or features is anticipated should this site be selected for development.

6.2.3 Built Environment

Neither the Hutten (2011) study nor this study identified buildings or structures of historical or heritage significance in the Preferred Site. For the rest of the project area, the general landscape holds varied significance in terms of the built environment as the area comprises historical farming remnants and relatively newly established industrial zones, settlements and townlands. However, no impact on built environment sites is anticipated should this site be selected for development.

6.2.4 Cultural Landscape

Generally, the proposed project area and its surrounds are characterised by open fields and farmlands. Further away from the project area, the landscape is typical of the rural north Limpopo with undulating hills with flatter plains in-between. This landscape stretches over many kilometres and the proposed project is unlikely to result in a significant impact on the landscape.

6.2.5 Graves / Human Burials Sites

Neither the Hutten (2011) study nor this study identified human burials in the Preferred Site and no impact on human remains is foreseen should this site be selected for development should this site be selected for development. In the rural areas of the Limpopo Province 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.

No heritage resources were documented in the Spitskop Solar Park Project Preferred Site and it is the opinion of the author of this Archaeological Impact Assessment Report that the proposed project will not impact on sensitive heritage resources should the Preferred Site be selected for development. The development of the Preferred Site may proceed from a culture resources management perspective, provided that no previously undetected heritage remains are encountered during any phase of development.

6.3 Management actions

Recommendations for relevant heritage resource management actions are vital to the conservation of heritage resources. A general guideline for recommended management actions is included in Section 10.4 of Addendum 3.

OBJECTIVE: ensure conservation of heritage resources of significance, prevent unnecessary disturbance and/or destruction of previously undetected heritage receptors.

6.3.1 Archaeology

- *The site survey for the Spitskop Solar Park Project excluded the **Alternative Site** due to access restrictions. Undetected heritage receptors might be present and a detailed site walkover of this site should be conducted by a heritage specialist should it be considered for development.*

- *No specific mitigation measures in terms of further heritage resources management are required for the **Preferred Site**. However, the following general recommendations should be considered:*

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**)			
Short-term Site Monitoring: Monitoring of site clearing and earth moving during initial stages of the development to detect the presence of possible heritage resources in the project area. **General Site Monitoring:** Regular examination of trenches and excavations for the total duration of construction.		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

The larger landscape around the project area indicates a rich heritage horizon encompassing Iron Age Farmer and Colonial / Historical Period archaeology primarily related to farming, rural expansion and warfare of the past century. The farm Wildebeestlaagte subject to this assessment was portioned towards the end of the 19th century and no particular reference to archaeological sites or features of heritage potential were recorded during an examination of literature thematically or geographically related to the properties. In addition, the 2011 HIA conducted by Hutten Heritage Consultants did not identify heritage resources, sites or finds of any value or significance in the Preferred Site. An examination of historical aerial imagery and archive maps indicate that the larger landscape had been utilized for intensive agriculture during the last century and portions of Wildebeestlaagte, and the project areas have been altered and transformed in the last century. An archaeological site assessment was conducted of the Preferred Site but access could not be obtained onto the Alternative Site and this site was not included in the site walkover. During the survey, **no heritage receptors were noted on the Preferred Site** and it might be assumed that development at this site will result in a minimal (if any) impact on heritage resources. This inference is made subject to further on-site observations required during pre-construction vegetation clearing and earth moving activities. The following recommendations are made based on general observations in the proposed Spitskop Solar Park Project in terms of heritage resources management.

- The site survey for the Spitskop Solar Park Project excluded the Alternative Site due to access restrictions. Findings from the desktop assessment, indicating a sparse human settlement pattern and significant agriculture development during the last century, suggest a low heritage potential for this site. However, undetected heritage receptors might be present at the Alternative Site and a detailed site walkover of this site should be conducted by a heritage specialist should this site be considered for development.
- The site survey of the Preferred Site was constrained due to dense vegetation and frequent site monitoring of the initial stages of the project (vegetation clearing, earth moving and excavations) by an informed Environmental Control Officer (ECO) is recommended. 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 should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the project landscape 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 occur in the larger landscape, such resources should be regarded as potentially sensitive in terms of possible subsurface deposits.

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9 ADDENDUM 1: HERITAGE LEGISLATION BACKGROUND

9.1 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.

9.1.1 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.

9.1.2 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 m^2 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 m^2 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.

9.2 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, auguring), 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 reinternment [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.

10 ADDENDUM 2: IMPACT ASSESSMENT METHODOLOGY

10.1.1 Issues Identification Matrix

impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES, for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. Here, two parameters and five factors are considered when assessing the significance of the identified issues, and each is scored. ***Significance*** is achieved by ranking the five criteria presented in Table 1 below, to determine the overall significance of an issue. The ranking for the "effect" (which includes scores for duration; extent; consequence and probability) and reversibility / mitigation are then read off the matrix presented in Table 2 below, to determine the overall significance of the issue. The overall significance is either negative or positive.

- ***Duration*** - The temporal scale defines the significance of the impact at various time scales, as an indication of the duration of the impact.

- ***Extent*** - The spatial scale defines the physical extent of the impact.

- ***Consequence*** - The consequence scale is used in order to, as far as possible, objectively evaluate how severe a number of negative impacts associated with the issue
under consideration might be, or how beneficial a number of positive impacts associated with the issue under consideration might be.

- The ***probability*** of the impact occurring - The likelihood of impacts taking place as a result of project actions arising from the various alternatives. There is no doubt that some impacts would occur (e.g. loss of vegetation), but other impacts are not as likely to occur (e.g. vehicle accident), and may or may not result from the proposed development and alternatives. Although some impacts may have a severe effect, the likelihood of them occurring may affect their overall significance.

- ***Reversibility / Mitigation*** – The degree of difficulty of reversing and/or mitigating the various impacts ranges from easily achievable to very difficult. The four categories used are listed and explained in Table 1 below. Both the practical feasibility of the measure, the potential cost and the potential effectiveness is taken into consideration when determining the appropriate degree of difficulty.

10.1.2 Assessing Impacts

The CES rating scale used in this assessment takes into consideration the following criteria, and includes the new criteria for assessing post mitigation significance (residual impacts), by incorporating the principles of reversibility and irreplaceability:

- **Nature of impact** (Negative or positive impact on the environment).
- **Type of impact** (Direct, indirect and/or cumulative effect of impact on the environment).
- **Duration, Extent, Probability** (see **Table** below)

Duration (Temporal Scale)		Score
Short term	Less than 5 years	1
Medium term	Between 5-20 years	2
Long term	Between 20 and 40 years (a generation) and from a human perspective also permanent	3
Permanent	Over 40 years and resulting in a permanent and lasting change that will always be there	4
Extent (Spatial Scale)		
Localised	At localised scale and a few hectares in extent	1
Study Area	The proposed site and its immediate environs	2
Regional	District and Provincial level	3
National	Country	3
International	Internationally	4
Probability (Likelihood)		
Unlikely	The likelihood of these impacts occurring is slight	1
May Occur	The likelihood of these impacts occurring is possible	2
Probable	The likelihood of these impacts occurring is probable	3
Definite	The likelihood is that this impact will definitely occur	4

- **Severity or benefits**

Impact Severity (The severity of negative impacts, or how beneficial positive impacts would be on a particular affected system or affected party)		Score
Very severe	**Very beneficial**	**4**
An irreversible and permanent change to the affected system(s) or party(ies) which cannot be mitigated. For example the permanent loss of land.	A permanent and very substantial benefit to the affected system(s) or party(ies), with no real alternative to achieving this benefit. For example the vast improvement of sewage effluent quality.	
Severe	**Beneficial**	**3**
Long term impacts on the affected system(s) or party(ies) that could be mitigated. However, this mitigation would be difficult, expensive or time consuming, or some combination of these. For example, the clearing of forest vegetation.	A long term impact and substantial benefit to the affected system(s) or party(ies). Alternative ways of achieving this benefit would be difficult, expensive or time consuming, or some combination of these. For example an increase in the local economy.	
Moderately severe	**Moderately beneficial**	**2**
Medium to long term impacts on the affected system(s) or party (ies), which could be mitigated. For example constructing the sewage treatment facility where there was vegetation with a low conservation value.	A medium to long term impact of real benefit to the affected system(s) or party(ies). Other ways of optimising the beneficial effects are equally difficult, expensive and time consuming (or some combination of these), as achieving them in this way. For example a 'slight' improvement in sewage effluent quality.	
Slight	**Slightly beneficial**	**1**
Medium or short term impacts on the affected system(s) or party(ies). Mitigation is very easy, cheap, less time consuming or not necessary. For example a temporary fluctuation in the water table due to water abstraction.	A short to medium term impact and negligible benefit to the affected system(s) or party(ies). Other ways of optimising the beneficial effects are easier, cheaper and quicker, or some combination of these.	
No effect	**Don't know/Can't know**	
The system(s) or party(ies) is not affected by the proposed development.	In certain cases it may not be possible to determine the severity of an impact.	

** In certain cases it may not be possible to determine the severity of an impact thus it may be determined: Don't know/Can't know*

The scores for the three criteria in the Tables above are added to obtain a composite score. They must then be considered against the severity rating to determine the overall significance of an activity. This is because the severity of the impact is far more important than the other three criteria. The overall significance is then obtained by reading off the matrix presented in the table below. The overall significance is either negative or positive (Criterion 1) and direct, indirect or cumulative (Criterion 2).

SEVERITY	COMPOSITE DURATION, EXTENT & PROBABILITY SCORE									
	3	4	5	6	7	8	9	10	11	12
Slight	3	4	5	6	7	8	9	10	11	12
Mod severe	3	4	5	6	7	8	9	10	11	12
Severe	3	4	5	6	7	8	9	10	11	12
Very severe	3	4	5	6	7	8	9	10	11	12

The **environmental significance** scale is an attempt to evaluate the importance of a particular impact. This evaluation needs to be undertaken in the relevant context, as an impact can either be ecological or social, or both. The evaluation of the significance of an impact relies heavily on the values of the person making the judgment. For this reason, impacts of especially a social nature need to reflect the values of the affected society.

OVERALL SIGNIFICANCE *(The combination of all the above criteria as an overall significance)*	
VERY HIGH NEGATIVE	**VERY BENEFICIAL**
These impacts would be considered by society as constituting a major and usually permanent change to the (natural and/or social) environment, and usually result in severe or very severe effects, or beneficial or very beneficial effects. *Example: The loss of a species would be viewed by informed society as being of VERY HIGH significance.* *Example: The establishment of a large amount of infrastructure in a rural area, which previously had very few services, would be regarded by the affected parties as resulting in benefits with VERY HIGH significance.*	
HIGH NEGATIVE	**BENEFICIAL**
These impacts will usually result in long term effects on the social and/or natural environment. Impacts rated as HIGH will need to be considered by society as constituting an important and usually long term change to the (natural and/or social) environment. Society would probably view these impacts in a serious light. *Example: The loss of a diverse vegetation type, which is fairly common elsewhere, would have a significance rating of HIGH over the long term, as the area could be rehabilitated.* *Example: The change to soil conditions will impact the natural system, and the impact on affected parties (such as people growing crops in the soil) would be HIGH.*	
MODERATE NEGATIVE	**SOME BENEFITS**
These impacts will usually result in medium to long term effects on the social and/or natural environment. Impacts rated as MODERATE will need to be considered by society as constituting a fairly important and usually medium term change to the (natural and/or social) environment. These impacts are real but not substantial. *Example: The loss of a sparse, open vegetation type of low diversity may be regarded as MODERATELY significant.*	
LOW NEGATIVE	**FEW BENEFITS**
These impacts will usually result in medium to short term effects on the social and/or natural environment. Impacts rated as LOW will need to be considered by the public and/or the specialist as constituting a fairly unimportant and usually short term change to the (natural and/or social) environment. These impacts are not substantial and are likely to have little real effect. *Example: The temporary changes in the water table of a wetland habitat, as these systems are adapted to fluctuating water levels.* *Example: The increased earning potential of people employed as a result of a development would only result in benefits of LOW significance to people who live some distance away.*	
NO SIGNIFICANCE	
There are no primary or secondary effects at all that are important to scientists or the public. *Example: A change to the geology of a particular formation may be regarded as severe from a geological perspective, but is of NO significance in the overall context.*	
DON'T KNOW	
In certain cases it may not be possible to determine the significance of an impact. For example, the primary or secondary impacts on the social or natural environment given the available information. *Example: The effect of a particular development on people's psychological perspective of the environment.*	

10.1.3 Post Mitigation Significance

Once mitigation measure are proposed, the following criteria are then used to determine the overall post mitigation significance of the impact:

- Reversibility: The degree to which an environment can be returned to its original/partially original state.
- Irreplaceable loss: The degree of loss which an impact may cause.
- Mitigation potential: The degree of difficulty of reversing and/or mitigating the various impacts ranges from very difficult to easily achievable. The four categories used are listed and explained in Table 5 below. Both the practical feasibility of the measure, the potential cost and the potential effectiveness is taken into consideration when determining the appropriate degree of difficulty.

Reversibility	
Reversible	*The activity will lead to an impact that can be reversed provided appropriate mitigation measures are implemented.*
Irreversible	*The activity will lead to an impact that is permanent regardless of the implementation of mitigation measures.*
Irreplaceable loss	
Resource will not be lost	*The resource will not be lost/destroyed provided mitigation measures are implemented.*
Resource will be partly lost	*The resource will be partially destroyed even though mitigation measures are implemented.*
Resource will be lost	*The resource will be lost despite the implementation of mitigation measures.*
Mitigation potential	
Easily achievable	*The impact can be easily, effectively and cost effectively mitigated/reversed.*
Achievable	*The impact can be effectively mitigated/reversed without much difficulty or cost.*
Difficult	*The impact could be mitigated/reversed but there will be some difficultly in ensuring effectiveness and/or implementation, and significant costs.*
Very Difficult	*The impact could be mitigated/reversed but it would be very difficult to ensure effectiveness, technically very challenging and financially very costly.*

11 ADDENDUM 3: 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 it 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. site-specific, 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

	TYPE OF DEVELOPMENT			
HERITAGE CONTEXT	**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
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 **Context 2:** Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade 3B heritage resources. **Context 3:**	**Category A: Minimal intensity development** - 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. **Category B: Low-key intensity development** - Spot rezoning with no change to overall zoning of a site. - Linear development less than 100m

Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade 3C heritage resources **Context 4:** Of little or no intrinsic, associational or contextual heritage value due to disturbed, degraded conditions or extent of irreversible damage.	- 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%). **Category C: Moderate intensity development** - Rezoning of a site between 5000m2-10 000m2. - 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%) **Category D: High intensity development** - 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%)

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.

No further action / Monitoring

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.

Avoidance

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.

Mitigation

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.

Compensation

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.

Rehabilitation

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:

- 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.

Enhancement