



**CES: PROPOSED BORWA VENT SHAFT & BULK POWER
SUPPLY PROJECT ON THE REMAINDER OF FARM MALOKELA
370 KT AND PORTION 7 OF FARM THORNCLIFFE 374 KT,
SEKHUKHUNE DISTRICT MUNICIPALITY LIMPOPO PROVINCE**

Heritage Impact Assessment Report

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

A 3D rendering of a globe with water splashing over it, set against a white background with a reflection below.

**Innovation in
Sustainability**

Prepared for: **CES**

Prepared by: **Exigo Sustainability**



HERITAGE IMPACT ASSESSMENT (HIA) ON THE REMAINDER OF FARM MALOKELA 370 KT AND PORTION 7 OF FARM THORNCLIFFE 374 KT FOR THE PROPOSED BORWA VENT SHAFT & BULK POWER SUPPLY PROJECT, SEKHUKHUNE DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

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DECLARATION

I, Nelius Le Roux Kruger, declare that –

- I act as the independent specialist;
- I am conducting any work and activity relating to the proposed Borwa Vent Shaft & Bulk Power Supply Project in an objective manner, even if this results in views and findings that are not favourable to the client;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have the required expertise in conducting the specialist report and I will comply with legislation, including the relevant Heritage Legislation (National Heritage Resources Act no. 25 of 1999, Human Tissue Act 65 of 1983 as amended, Removal of Graves and Dead Bodies Ordinance no. 7 of 1925, Excavations Ordinance no. 12 of 1980), the Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment (SAHRA, AMAFA and the CRM section of ASAPA), regulations and any guidelines that have relevance to the proposed activity;
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Signature of specialist
Company: Exigo Sustainability
Date: 25 September 2023

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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 Borwa Vent Shaft & Bulk Power Supply Project on the Remainder of Farm Malokela 370 KT and Portion 7 of Farm Thorncliffe 374 KT in the Sekhukhune District Municipality of the Limpopo Province. The proposed project entails the construction of three ventilation shafts and associated infrastructure as well as up and down cast bulk power supply at Mototolo Mine’s Borwa Shaft. The report includes an Archaeological Impact Assessment (AIA) component with background information on the area’s archaeology, paleontology and sense of landscape and place in terms of its representation in Southern Africa as well as 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	Borwa Vent Shaft & Bulk Power Supply Project
Project Location	S25.00549° E30.10118°
1:50 000 Map Sheet	2530AA
Farm Portion / Parcel	The Remainder of Farm Malokela 370 KT and Portion 7 of Farm Thorncliffe 374 KT
Magisterial District / Municipal Area	Sekhukhune District Municipality
Province	Limpopo Province

A number of academic archaeological and historical studies have been conducted in this section of the Limpopo Province and these studies all infer a rich and diverse archaeological landscape, representative of most phases of human and cultural development in Southern Africa. The cultural landscape of the Sekhukhune region 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. Contained in its archaeology are traces of conquests by Bantu-speakers, Europeans and British imperialism encompassing the struggle for land, resources and political power. Sekhukhune is rich in archaeological sites, dating from the Early Iron Age (800AD) to the Pedi occupation of the area. This is most probably due to the safety the valley offered from outside attacks, but also as a result of the deep and rich sedimentary soils of the low-lying area. It is also of historical importance due to the activities of the Berlin Missionary Society who entered the area in the time of Chief Sekwati. It has been noted that portions of Malokela and Thorncliffe, and the project area have been altered and transformed as a result of more recent mining and quarrying. During the survey, heritage receptors were noted in the project areas and the following recommendations are made based on general observations in the Borwa Vent Shaft & Bulk Power Supply Project in terms of heritage resources management.

- The remains of two Historical Period settlement areas consisting out of stone wall enclosures, lower grind stones, middens and material culture such as glass and metal (as **Site EXIGO-TC374-HP01** and **Site EXIGO-TC374-HP02**) are of medium-low significance due to the more recent provenience and poor preservation of the sites. The sites occur within proposed project development areas and it is recommended that the general area be closely monitored in order to avoid the destruction of previously undetected heritage remains – particularly potential burials associated with the settlements.

In addition, application should be made for a destruction permit from the relevant heritage authorities should the possible Historical Period site be impacted on, altered or destroyed.

- The larger Steelpoort area comprises a rich cultural landscape and tangible and intangible heritage aspects associated with local communities are abundant. A site of apparent ritual importance was pointed out by a mine employee (**Site EXIGO-TC374-FT01**). The site, which consists of a stone cairn under a tree is potentially of medium heritage significance due to its implied local social and ritual value. It is located within proposed project development areas and it is primarily recommended that a strict heritage conservation buffer of at least 20m be implemented around the feature. Here, the redesign the footprint areas of the ventilation shaft platform, borrow pit, access road and power lines would be necessary to avoid the heritage resource and the proposed conservation buffer. It is advisable that the site be fenced and that access control be applied. Generally, careful monitoring should be conducted by a heritage specialist or an informed Environmental Control Officer (ECO) in order to detect any potential impact on the site at the earliest opportunity. However, should impact on the site prove inevitable a full social consultation process with affected parties / communities regarding significance of site, possible conservation management and protection measures will be required. Application should be made for a destruction permit from heritage authorities and affected parties if/when required. Consideration could be given to the downgrading of site significance and removal of the buffer requirement if the function of the feature is established and site context is confirmed to be low by means of stakeholder engagement and consultation with informants familiar with the history and local knowledge of the project property and the cultural landscape that surrounds it.
- It is essential that cognisance be taken of the larger heritage landscape of the area in order to avoid the destruction of previously undetected heritage sites. It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the Study Area along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period. As such, the general monitoring of the development progress by an ECO or by the heritage specialist is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately.

Borwa Vent Shaft & Bulk Power Supply Project Heritage Sites Locations

Site Code	Coordinate S E	Short Description	Impact Aspect	Mitigation Action
EXIGO-TC374-FT01	S25.82279° E25.85091°	Potential Ritual / Intangible Heritage Site	DIRECT PERMANENT: ventilation shaft platform, borrow pit, access road, power line.	Avoidance, 20m conservation buffer, redesign infrastructure, site monitoring. Destruction permitting if impacted on. General site monitoring by informed ECO.
EXIGO-TC374-HP01	S25.00567° E30.10458°	Historical Period Occupation Site	DIRECT PERMANENT: Access road, power line.	Destruction permitting if impacted on.
EXIGO-TC374-HP02	S24.99988° E30.09666°	Historical Period Occupation Site	DIRECT PERMANENT: Access road, power line.	General site monitoring by informed ECO.

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 CES to conduct a Heritage Impact Assessment (HIA) study in support of an Environmental Impact Assessment (EIA) process for the proposed Borwa Vent Shaft & Bulk Power Supply Project in the Limpopo Province. The rationale of this AIA is to determine the presence of heritage resources such as archaeological and historical sites and features, graves and places of religious and cultural significance in previously unstudied areas; to consider the impact of the proposed project on such heritage resources, and to submit appropriate recommendations with regard to the cultural resources management measures that may be required at affected sites / features.

1.2 Project Direction

Exigo'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

CES was appointed by Anglo American Platinum to undertake the environmental impact assessment process (EIA) for the proposed construction of three ventilation shafts and associated infrastructure as well as up and down cast bulk power supply at Mototolo Mine's Borwa Shaft (hereafter referred to as the "Borwa Vent Shaft & Bulk Power Supply Project). The project is located on the Remainder of Farm Malokela 370 KT and Portion 7 of Farm Thorncliffe 374 KT, Sekhukhune District Municipality in the Limpopo Province").

VENTILATION AND EMULSION SHAFTS

The proposed development will include the construction of one downcast shaft, two exhaust (upcast) shafts and an emulsion shaft. The following details are currently available for the proposed ventilation and emulsion shafts.

BORROW PITS

Construction materials will be sourced from two borrow pits, namely:

- **Borrow pit 01**, located near the entrance to the project area, immediately to the south of the main Borwa Shaft mining area, which will encompass an area of 1 950 m²; and
- **Borrow pit 02**, located near the Northern Upcast Vent Shaft, which will encompass an area of 2 138 m².

ACCESS ROADS

The proposed development will require the upgrading of the existing access roads on site, given their current eroded condition, as well as the generally rugged terrain of the project area. Upgraded access roads will be required to each ventilation shaft / emulsion hole and will be included in the applications. Access will be required

to enable construction of the ventilation shaft and for future inspections. Road will need to be designed to accommodate environmental and physical vehicle requirements to lessen effect on the environment and enable safe use of the road by vehicles.

POWERLINES

The proposed development will require the construction of three new unshielded 11 kV pole mounted Fox overhead feeder lines (constructed to 33 kV specifications) with three 630 kVA 11 / 0.55 kV ONAN Dyn11 Type B minisub stations feeding Borwa, including:

- The Ventilation Line South (Borwa-South), 2 600 m in length;
- The Ventilation Line North (Borwa-North), 2 000 m in length; and
- The Downcast Line, 1200 m in length (Figure 1.1).

CONSTRUCTION SITE CAMP

The proposed development will require the establishment of a site camp, within or near the project area, with the following basic services:

- Ablution facilities
- Tanks for water for drilling operations
- Site offices
- Security and access control
- Illumination.

:

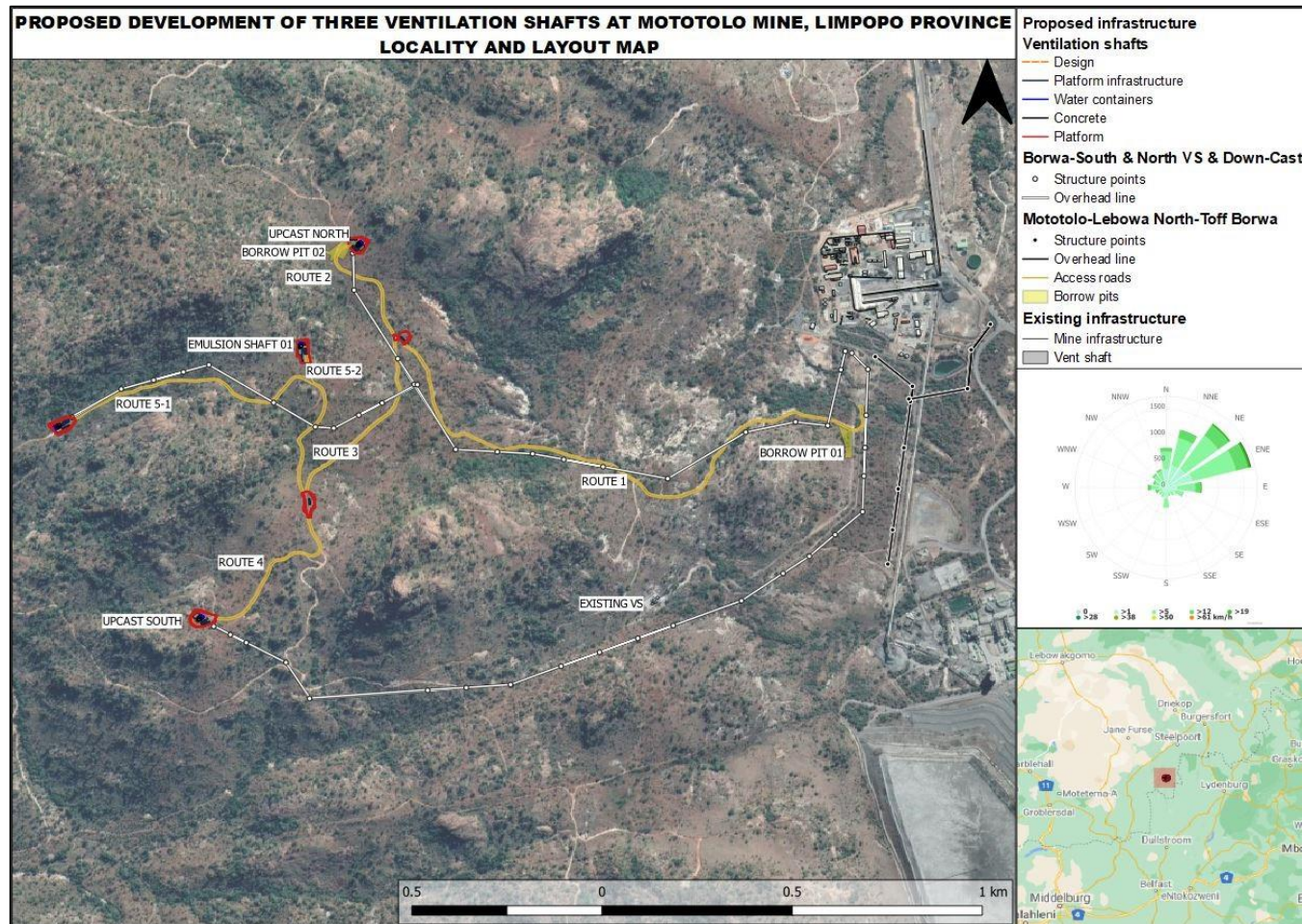


Figure 1-1: Map indicating the project aspects subject to the proposed Borwa Vent Shaft & Bulk Power Supply Project.

1.4 Terms of Reference

Heritage specialist input into the Environmental Impact Assessment (EIA) process is essential to ensure that, through the management of change, developments still conserve our heritage resources. 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 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 Borwa Vent Shaft & Bulk Power Supply Project area is located on portions of the farm Thorncliffe 374 KT in the Steelpoort area of the Sekhukhune District Municipality, Limpopo Province. It is located approximately 30km south of Steelpoort and 110km south-east of Polokwane, east of the R555 regional road connecting Burgersfort and Stoffberg. The area falls under the Sekhukhune District Municipality in the Limpopo Province. The study areas appear on 1:50000 map sheet 2530AA (see Figure 2-1) and a key location point for the project is:

- **General Midpoint: S25.00549° E30.10118°**

2.2 Area Description: Receiving Environment

The regional topographical setting of the Steelpoort area can be largely classified as low mountainous terrain throughout most parts of the central, eastern and western sections of the study area often forming deep valleys and a gorge to the west where the Olifants River cuts through the mountainous area. This eastern area is dominated by rugged hills with well-defined ridges and joint pattern valleys and troughs. The landscape straddles the westerly flowing Olifants River which appears to have exploited the natural joint pattern and created a deeply incised valley. Vegetation in the areas is generally classified as Bushveld and grassland cover. An ecological assessment will be conducted and included in the EIA Report.

2.3 Site Description

The Borwa Vent Shaft & Bulk Power Supply Project area is situated along rugged hills south of the town of Steelpoort. The terrain consists predominantly of mountainous areas with flatter parcels of developable land on the plateaus, terraces and areas adjacent to the rivers. The proposed project development footprints are situated in areas that have been altered in places as a result of human settlement, earlier mining, prospecting and the establishment of mine roads and other infrastructure. Original vegetation remains intact on high slopes of mountains in the area as well as along water courses and pioneer plant species are prevalent in transformed zones. A number of perennial and non-perennial streams and drainage lines originating in the surrounding hills, bisect the region. Generally, human impact has resulted to the degradation of the environment as a result of over-exploitation and overgrazing. This manifests in large-scale surface soil loss both as donga and sheet erosion which is prevalent throughout the region.

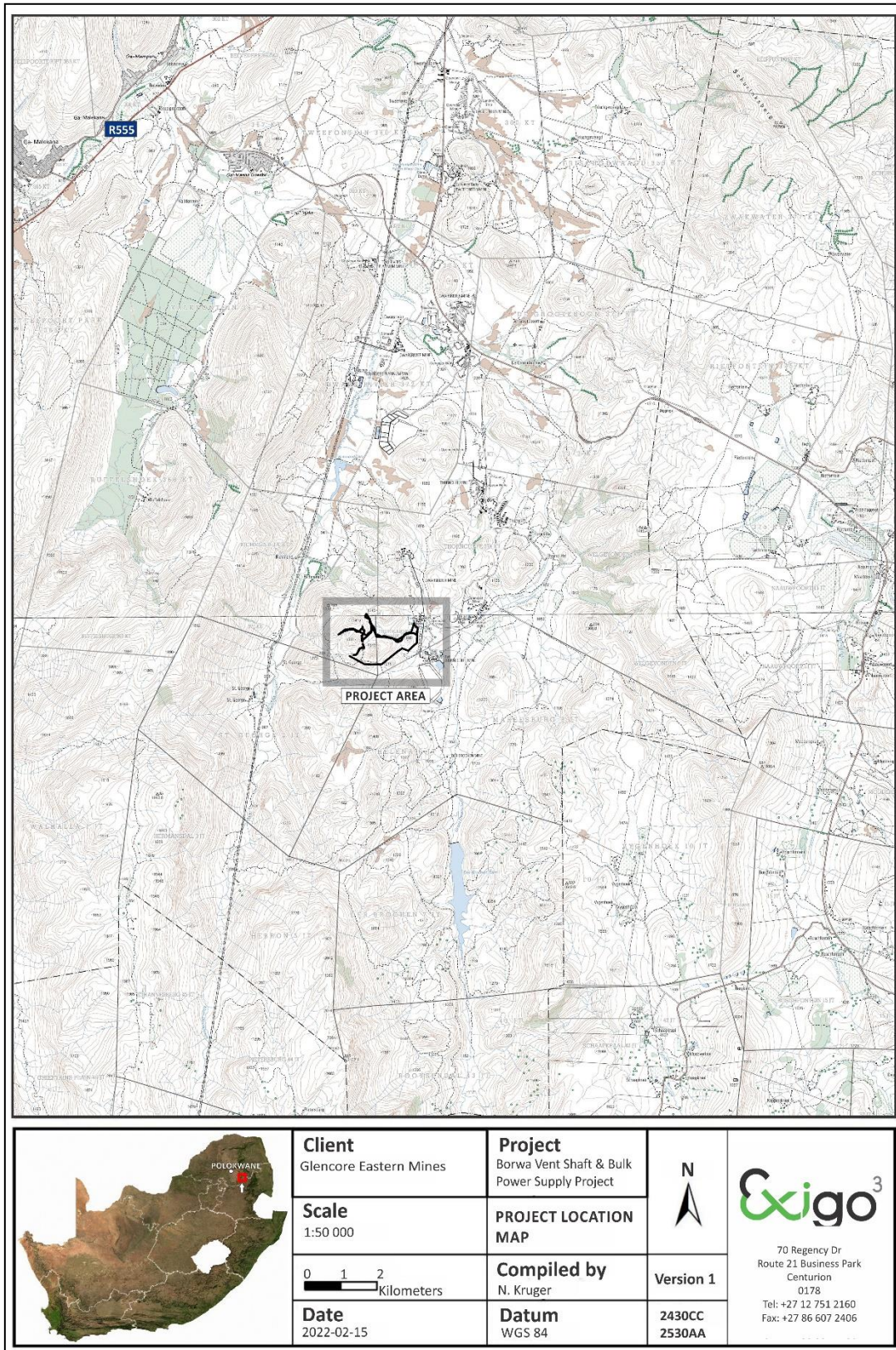


Figure 2-1: 1:50 00 Map representation of the location of the proposed Borwa Vent Shaft & Bulk Power Supply Project (sheet 2530AA).



Figure 2-2: Aerial map providing a regional context for the proposed Borwa Vent Shaft & Bulk Power Supply Project.

3 ARCHAEO-HISTORICAL CONTEXT

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: <i>Australopithecines</i> <i>Homo habilis</i> <i>Homo erectus</i>	Typically large stone tools such as hand axes, choppers and cleavers.
Middle Stone Age 250 000 – 25 000 YCE	Pleistocene	First <i>Homo sapiens</i> species	Typically smaller stone tools such as scrapers, blades and points.
Late Stone Age 20 000 BC – present	Pleistocene / Holocene	<i>Homo sapiens sapiens</i> including San people	Typically small to minute stone tools such as arrow heads, points and bladelets.
Early Iron Age / Early Farmer Period 300 – 900 AD (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 Steelpoort Heritage Landscape

The history of the Steelpoort is reflected in a rich archaeological landscape, mostly dominated by Stone Age and Iron Age Farmer occurrences. Numerous sites, documenting Earlier, Middle and Later Stone Age habitation occur across the province, mostly in open air locales or in sediments alongside rivers or pans. In addition, a wealth of Iron Age sites is to be found in the larger landscape. These sites occur on hilltops, slopes,

rock outcrops and occasionally in river beds. Moving into recent times, the archaeological record reflects the development of a rich colonial frontier, characterised by, amongst others, a complex industrial archaeological landscape such as mining developments, which herald the modern era in South African history.

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 Bankeveld 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. Oldowan and Acheulian artefacts were also found four to five decades ago in some of the older gravels (ancient river beds and terraces) of the Vaal River and the Klip River in Vereeniging. The earliest ancestors of modern man may therefore have roamed the Vaal valley at the same time that their contemporaries occupied some of the dolomite caves near Krugersdorp. 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 points that may have had long wooden sticks as hafts and were used as spears. The Late Stone Age commenced twenty thousand years ago or somewhat earlier. The various types of Stone Age industries scattered across the country are associated with the historical San and Khoi-Khoi people. The San were renowned as formidable hunter-gatherers, while the Khoi-Khoi herded cattle and small stock during the last two thousand years. Late Stone Age people manufactured tools that were small but highly effective, such as arrow heads and knives. The Late Iron Age people were also known for their rock art skills.

Human habitation of the Steelpoort area dates back as far as the earlier Stone Age. One of the more important sites, known as Bushman Rock Shelter, is located at Echo Caves north of Ohrigstad. Early humans lived here for thousands of years from the Early Stone Age, through what is known as the Middle Stone Age and well into the Late Stone Age. The majority of Stone Age finds are classified as isolated surface occurrences, and mostly date to the Middle Stone Age. The location of Stone Age scatters in the area corresponds with a general Stone Age site distribution pattern where Stone Age archaeological sites in the landscape occur near water sources close to local sources of rare raw materials in lithic manufacture. From the deposition pattern and stratigraphy as observed in erosion gullies in this area, it is clear that the lithic scatters occur mainly as multiple horizons within a calcrete formation. In addition, an ephemeral surface overlay of Later Stone Age (LSA) artefacts produced on a variety of raw materials occurs in places. These materials are mostly of igneous origin, and predominantly fine-grained Cryptocrystalline Silicas (CCS) including quartzes, chalcedony, agates and mudstones, but also fine-grained dolerite and banded ironstone. Distinct production technologies were used to manufacture a range of specific tool types, resulting in characteristic features and attributes. Typical MSA tool types comprise blades, convergent flakes and backed formal tools. The latter tool types are mostly unifacial and bifacial points, knives, a variety of scrapers and also perforating tools (Thackeray 1992; Wadley 2005; Soriano et al 2007). The evidence for stages of lithic reduction, as observed in the dongas at Lesego points to some primary deposition and site integrity. However, only an in-depth technological study will identify a chain(s) of knapping operations, which can inform on such aspects, and also whether there are differences in knapping operations that may indicate chronological periods, e.g. early or final MSA depositions (Wadley 2001:216).

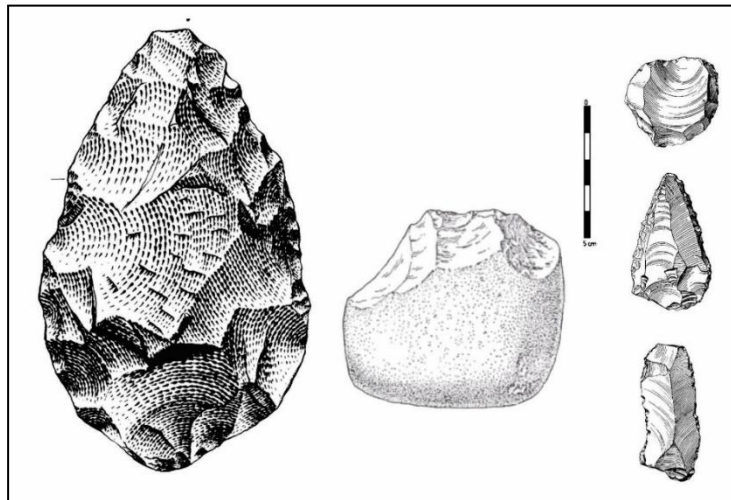


Figure 3-1: Typical ESA handaxe (left) and cleaver (center). To the right is a MSA scraper (right, top), point (right, middle) and blade (right, bottom).

3.2.2 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. One of the earliest dated Iron Age sites is located near Tzaneen (Silver Leaves). Iron Age occupation of the larger Steelpoort area seems to have taken place on a significant scale and of note is the Doornkop phase of the Early Iron Age. A thousand years ago this large and sophisticated community existed for hundreds of years in the Steelpoort area. Known to archaeologists as the “Doornkop phase” (named after the type site) of the Earlier Iron Age, these people are well-known for the extraordinary clay masks they produced, some of which was found on a site near Lydenburg. These settlements seem to have been followed at a slightly later date by settlements linked to the “Eiland Phase” of the EIA (c. AD 1000) which lasted well into the second millennium AD. Early Iron Age sites are generally our only source of evidence for the occupation of the area by early farming communities. As such these sites are important and they are viewed to have medium to high significance. The last period of pre-colonial occupation consisted of Pedi-, Swazi- and Ndebele-speaking people that settled on terraced sites at the foot on the mountains. A single decorated potsherd from Site IA5 displays motives similar to that of the Maloko ceramic tradition, which can be broadly associated with some of these groups. The last 500 years in the area were characterised by population movements, conflict, contact and change which largely resulted in the current population and demographic distribution in the area today. The resonance of these sites in contemporary history generally deems them of medium significance.

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

The Historical / Colonial Period in the Steelpoort area commenced roughly in the early 19th century with the arrival of the first white settlers. After negotiations between the Voortrekkers and the Pedi, the Steelpoort

River was set as border between the groups. However, tension soon followed which rapidly resulted to armed conflict, notably the so-called Sekhukhune Wars (1876, 1879) of which remnants are still to be found in the larger geographical region. Later, during the so-called Mapoch Wars (1863, 1883) resulting land-ownership conflicts were contested. In later years, farms were proclaimed, most of which were used only for winter grazing. This was followed by a period when farmsteads and road infrastructure developed. In recent years, the substantial mineral wealth of the area was realised, primarily resulting from seminal work by geologist Hans Merensky. The farm Thorncliffe and other farms in the area were proclaimed in 1890.

4 METHOD OF ENQUIRY

4.1 Sources of Information

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

4.1.1 Desktop Study

A desktop study was prepared in order to contextualize the proposed project within a larger historical milieu. The study focused on relevant previous studies, archaeological and archival sources, aerial photographs, historical maps and local histories, all pertaining to the Steelpoort area and the larger landscape of this section of the Limpopo Province. The desktop study examined a number of archaeological and historical impact assessments conducted in the Steelpoort Valley and surrounds.

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 on this method to assist the foot and automotive 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 vehicular and pedestrian surveys were carried out.

4.1.3 Mapping of sites

Similar to the aerial survey, the site assessment of the project area relied on archive and more recent map renderings of Malokela and Thorncliffe to assist the 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 Steelpoort 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. Archaeological surveys of the Borwa Vent Shaft & Bulk Power Supply Project area were conducted in January and February 2022. 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.

4.1.5 General Public Liaison

Consultation with officials from Anglo who are familiar with the area in question assisted with the identification of heritage receptors in the project area.

4.2 Limitations

The site survey for the Borwa Vent Shaft & Bulk Power Supply 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 mine service roads and access control was arranged for the site assessment and no access restrictions onto the site were encountered during the site visit.
- The surrounding vegetation in the project area mostly comprised out of dense tree cover and mountain vegetation with pioneering species occurring in places and the general visibility at the time of the site inspection (January and February 2022) proved to be a constraint in the project area.

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. 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 4-1: View of the project area along an access road on a high mountain slope.



Figure 4-2: View of an eroded access road and general surroundings in the project area.



Figure 4-3: View of an burnt vegetation and an exposed rock face in the project area.



Figure 4-4: View of general surroundings in the project area.



Figure 4-5: View of existing access roads in the project area.



Figure 4-6: View of an exposed rock face and vegetation cover in the project area.



Figure 4-7: View of dense mountain slope vegetation in the project area.



Figure 4-8: View of surfaces cleared for prospecting in the project area.



Figure 4-9: View of dense vegetation in the project area.



Figure 4-10: View of erosion gullies and dongas in the project area.

4.3 Impact Assessment

For consistency among specialists, impacts were rated and assessed using an Impact and Risk Assessment Methodology provided by CES¹, for the Scoping Phase of the EIA process in accordance with the requirement of EIA Regulations. **Please refer to Section 6 and Addendum 2.**

5 RESULTS: HERITAGE SURVEY

5.1 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 Malokela and Thorncliffe property.

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

- The farm St.George, which was later subdivided to form the Farms Malokela and Thorncliffe, was established towards the end of the 19th century.
- The farm Thorncliffe is indicated on an early map of the Transvaal region (Jeppe, 1899).
- No man-made structures are indicated within the project area on a topographic map of the area dating to 1969 but crop fields are noted on the map.
- Aerial imagery dating to 1954, 1964 and 1970 indicate small and isolated settlements and agricultural fields on portions of Malokela and Thorncliffe - and particularly areas subject to this assessment. Possible buildings and potential man-made structures appear to exist within the project area on these images.
- It is evident from later aerial imagery that the landscape has been altered by more recent mining activities.
- Van Warmelo (1935) indicates a large number of Sotho and Swazi (Ndzunza) groups residing in and around the Steelpoort and the project area in 1935.

¹CES Risk Assessment Methodologies Internal guideline document, 2019

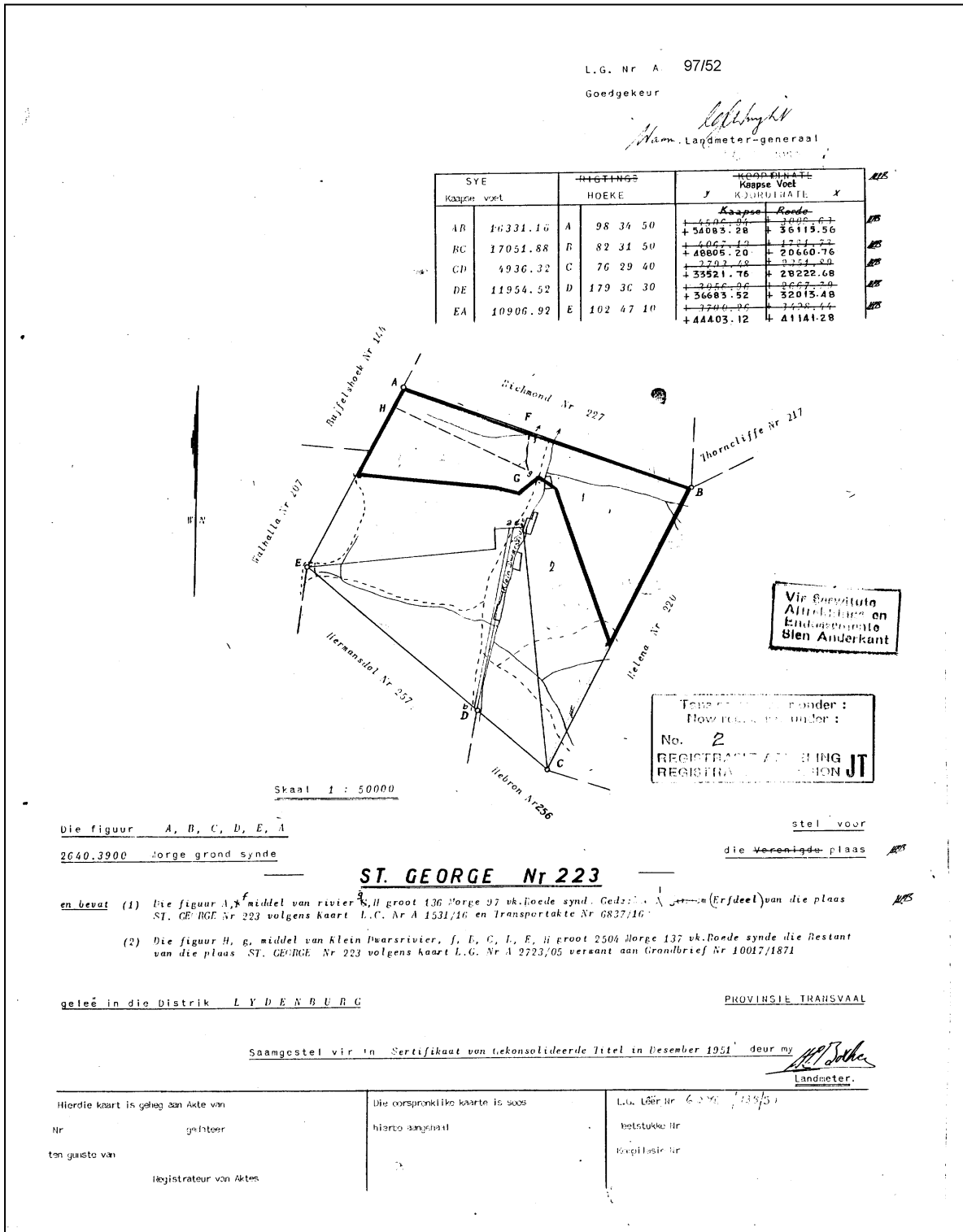


Figure 5-1: A title deed for the farm St. George dating to 1951.



Figure 5-2: Historical map of the old Transvaal region dating to 1899 (Jeppe) indicating the presence of the farm Thorncliffe (yellow outline) at the time.

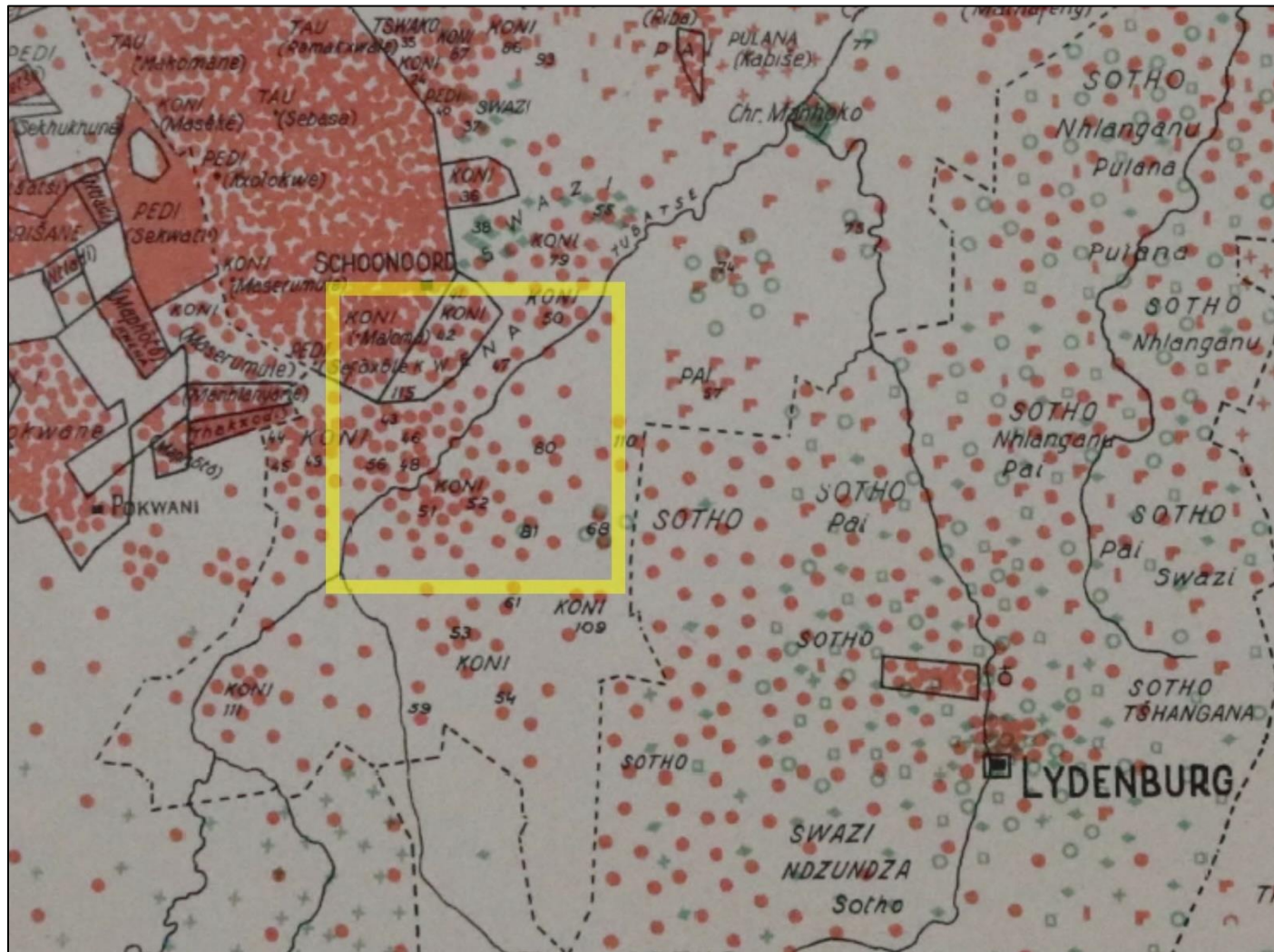
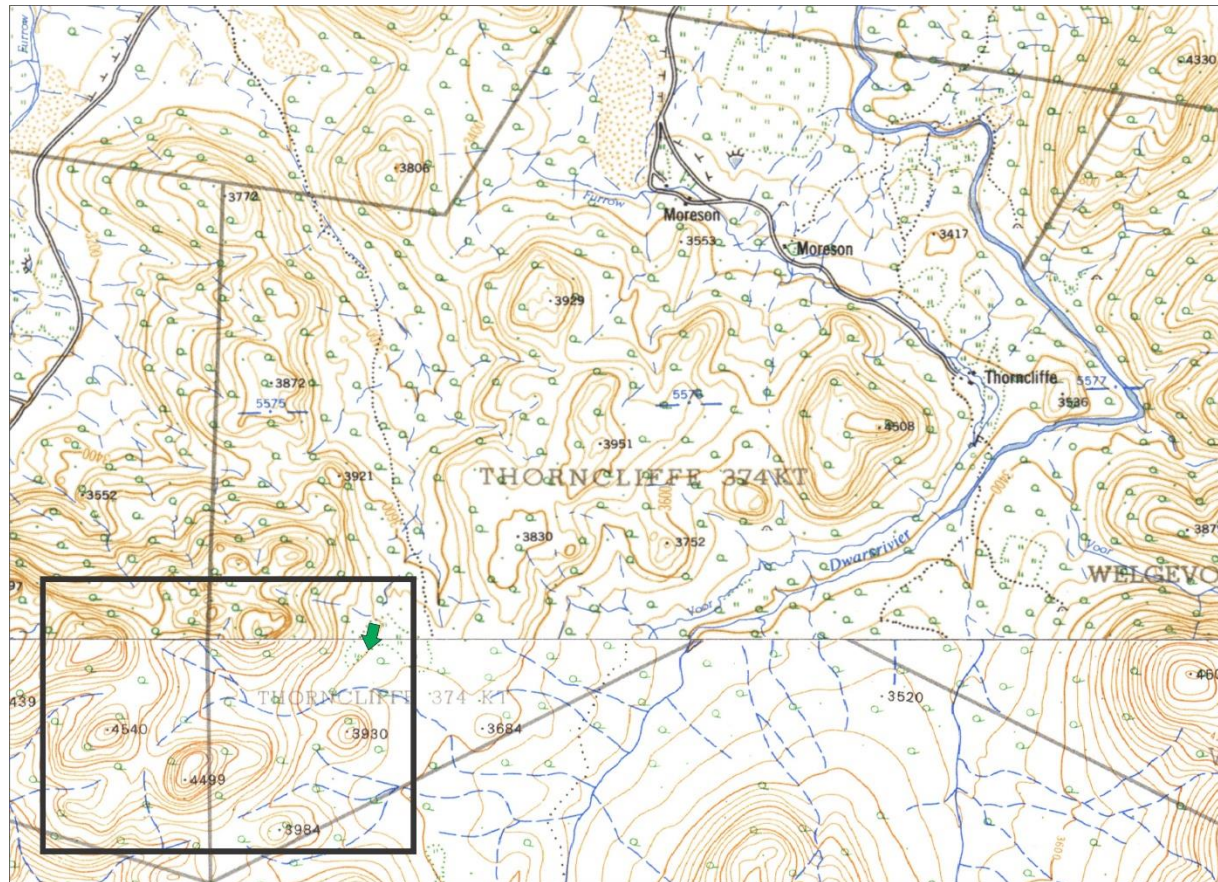


Figure 5-3: An excerpt of Van Warmelo's Map of the project landscape (the project area is indicated by the yellow block) dating to 1935. Each red dot represents "10 taxpayers". Note that the larger landscape was relatively densely populated by Sotho and Swazi (Ndzunza) groups groups at the time.



VERKLARING	REFERENCE
Magnetiese Stasies en Grondtekens	Magnetic Stations and Ground Signs
Hutte	Huts
Monumente	Monuments
Dipbakke	Dipping Tanks
Windpompe	Windmills
Mure	Walls
Grondbewaringswalle	Anti-erosion Walls
Uitgrawings	Excavations
Standhoudende Water	Perennial Water
Nie-standhoudende Water	Non-perennial Water
Droë Panne	Dry Pans
Fonteine, Watergate en Putte	Fountains, Springs, Waterholes and Wells
Moerasse en Vleie	Marshes, Swamps and Vleis
Pylyne	Pipelines
Fotomiddelpeunte	Photo Centres
Uitstaande Klipbanke	Prominent Rock Outcrops
Terrasse	Terraces
Bewerkte Lande	Cultivated Lands
Boorde en Wingerde	Orchards and Vineyards
Bome en Bos	Trees and Bush

VERKLARING	REFERENCE
Internasionale Grense	International Boundaries
Provinsiale Grense	Provincial Boundaries
Veelvoudige Spoorlyne	Multiple Track Railways
Enkelspoorlyne	Single Track Railways
Geëlektrifiseerde Spoorlyne	Electrified Railways
Smalspoorlyne	Narrow Gauge Railways
Dienspoorlyne	Service Railways
Nasionale Paale	National Roads
Hoofpaale	Main Roads
Sekondêre Paale	Secondary Roads
Ander Paale	Other Roads
Dowwe Paale en Voetpaale	Tracks and Footpaths
Kraglyne	Power Lines
Telefoon- en Telegraaflyne	Telephone and Telegraph Lines
Pos- en Telegraafkantore, Polisie-stasies en poste, Winkels, Hotelle, Skole en Plekke van Aanbidding	Post and Telegraph Offices, Police Stations and Posts, Stores, Hotels, Schools and Places of Worship
Vuurtorings en Seevaartligte	Lighthouses and Marine Lights
Seevaartbakens	Marine Beacons
Driehoeksbakens (Nommer regs en hoogte onder)	Trig. Beacons (Number to right and height below)

Figure 5-4: A historical topographic map of Malokela and Thorncliffe dating to 1968 indicating the location of the project area (black outlines) in the past decades. The green arrow indicates agricultural lands. Note the general absence of man-made structures indicated within the project area at the time.

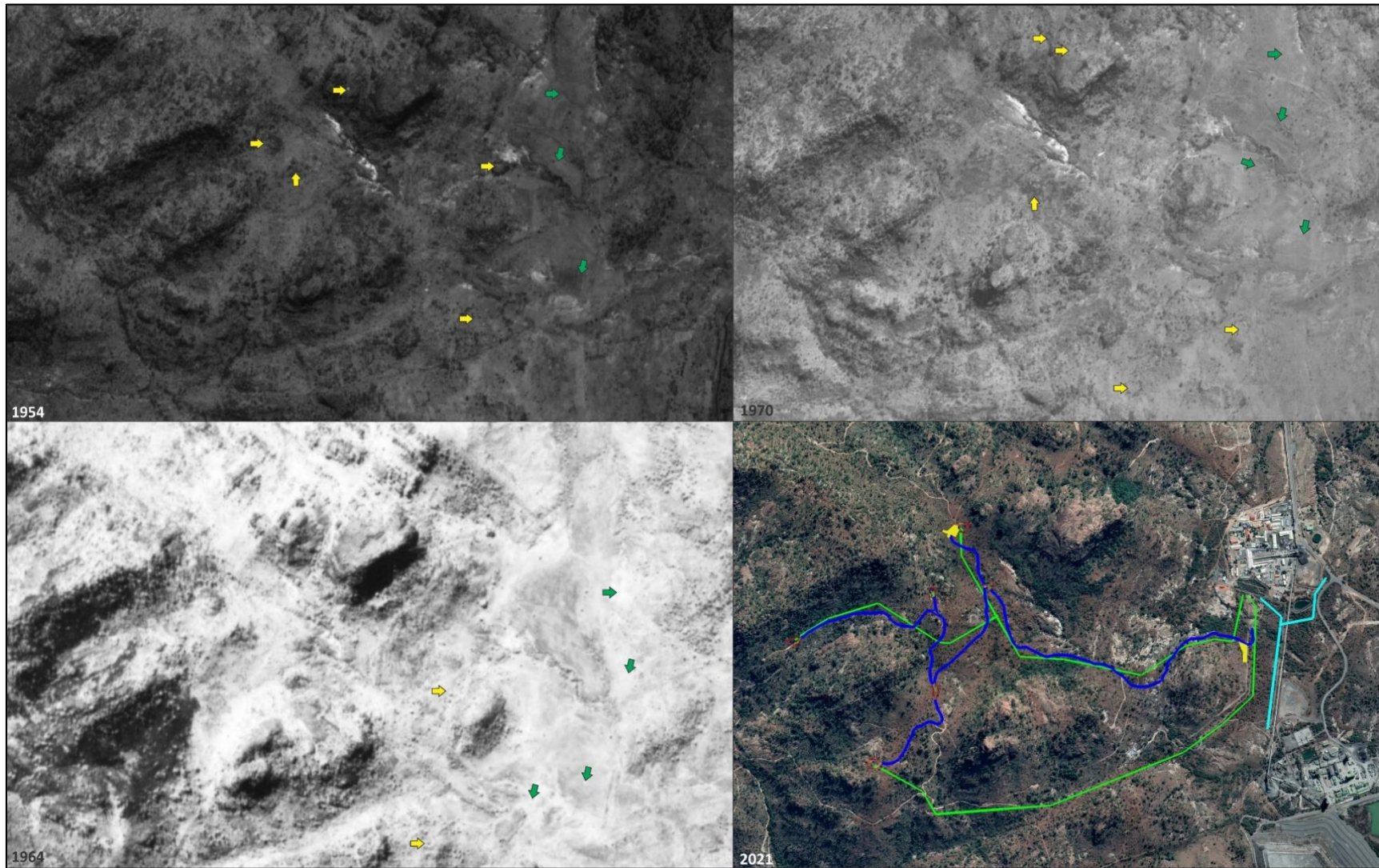


Figure 5-5: A series of historical aerial images of the project site on Malokela and Thorncliffe. Yellow arrows indicating potential man-made structures or features and green arrows indicate crop fields.

5.2 The Archaeological Site Survey

An analysis of historical aerial imagery and archive maps of areas subject to this assessment suggests a landscape that has been subjected to more recent mining activities possibly sterilising the area of heritage remains. This inference was confirmed during an archaeological site assessment but a single heritage site was nonetheless encountered. 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 development areas.

- The Iron Age Farmer Period

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

- Historical / Colonial Period and recent times

Steelpoort and its surroundings have a long and extensive Colonial Period settlement and mining 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 and probable Historical / Colonial Period occurrences were observed in the proposed project development areas.

- Historical Period Settlement (S25.00477° E30.10840°) Site EXIGO-TC374-HP01

A Historical Period settlement area was documented in the project area along a site access road to be upgraded and within an area demarcated for the construction of the power line ("Structure Point 4" in particular). Here, a number of round and square stone wall enclosures, stonewall foundations and terraces as well as a lower grindstone and ash middens were noted. Material culture such as glass and metal fragments were noted on the surface. An absolute temporal context, function or provenience for the site is not known but, considering the presence of glass and metal the site probably date to the later Historical Period. The general preservation of the feature and its structural integrity is poor due to site disturbances as well as deterioration due to natural processes. The site, which is of medium-low heritage significance due to its poor preservation and the general absence of site context, occurs in proposed project development areas and direct impact on the site is expected.



Figure 5-6: View of stone wall enclosures at Site EXIGO-TC374-HP01.



Figure 5-7: Stone foundations features at Site EXIGO-TC374-HP01.



Figure 5-8: A lower grind stone (left) and ash midden (right) at Site EXIGO-TC374-HP01.

- **Historical Period settlement (S25.00567° E30.10458°)**
Site EXIGO-TC374-HP02

A possible Historical Period settlement area was documented in the project area along an area demarcated for the construction of the power line (“Structure Point 6” in particular). At the site, a large stone cairn, a lower grindstone and an ash midden containing material culture such as glass and metal fragments were noted. An absolute temporal context, function or provenience for the site is not known but, considering the presence of glass and metal the site probably date to the later Historical Period. The general preservation of the feature and its structural integrity is poor due to site disturbances as well as deterioration due to natural processes. The site, which is of medium-low heritage significance due to its poor preservation and the general absence of site context, occurs in proposed project development areas and direct impact on the site is expected.



Figure 5-9: View of stone features on the surface at Site EXIGO-TC374-HP02.



Figure 5-10: View of a broken lower grindstone and a large stone cairn at Site EXIGO-TC374-HP02.

- **Other sites / features (S24.99988° E30.09666°)**
Site EXIGO-TC374-FT01

During the survey, a large stone cairn occurring under a tree within a proposed vent shaft platform was pointed out by a mine employee. It was noted that the site indicates a site of ritual importance to local communities. No other features or material culture were noted in association with the structure. The cultural and social significance (if any) and function of the site remains to be confirmed but consideration has to be given to the fact that the site might hold tangible and / or intangible heritage value within a landscape proven to be rich in such heritage resources – and for communities potentially sensitive to impact on the feature. The site, which is of possibly of medium heritage significance due to its implied local social and ritual value, occurs in proposed project development areas and direct impact on the site is expected.



Figure 5-11: View of the stone cairn under a tree at a presumed ritual site (Site EXIGO-TC374-FT01).

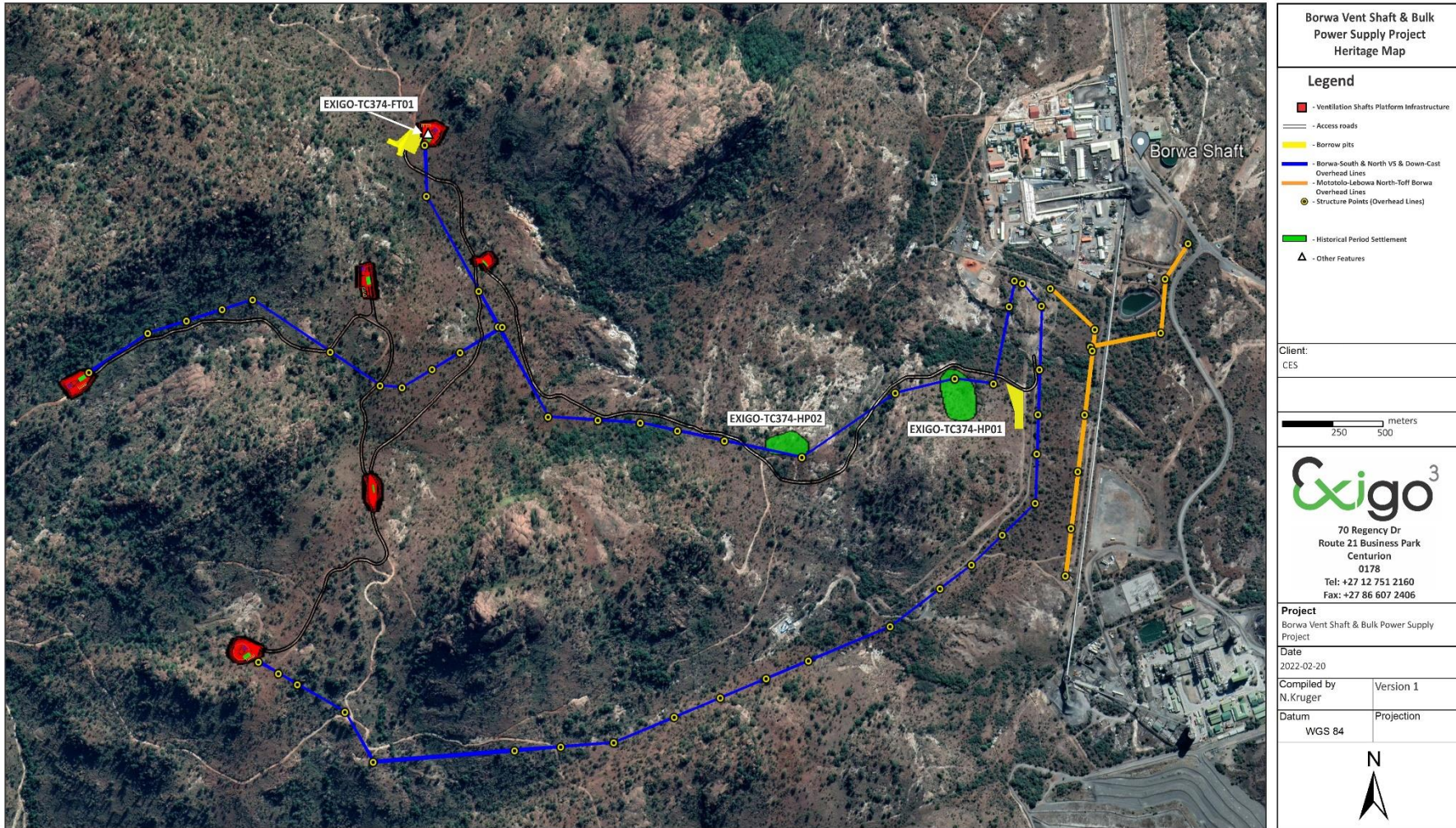


Figure 5-12: Aerial map indicating the location of the heritage site discussed in the text.

6 RESULTS: STATEMENT OF SIGNIFICANCE AND IMPACT RATING

6.1 Potential Impacts and Significance Ratings²

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

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

Impact Assessment: 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										
Without Mitigation	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
With Mitigation	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment: 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										
Without Mitigation	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
With Mitigation	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment: 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										
Without Mitigation	Negative	Permanent	Regional	Severe/ Beneficial	Definite	HIGH NEGATIVE	Irreversible	Resource will be lost	Achievable	HIGH NEGATIVE
With Mitigation	Negative	Short term	Study area	Slight/ Slightly Beneficial	Unlikely	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

Impact Assessment: 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										
Without Mitigation	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE
With Mitigation	Negative	Short term	Study area	Slight	Definite	LOW NEGATIVE	Irreversible	Resource will not be lost	Achievable	LOW NEGATIVE

6.3 Evaluation of Impacts

Previous studies conducted in the Limpopo Province and the Steelpoort 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.

Heritage resources ranging in significance from medium-low to medium occur inside and in the vicinity of the proposed Borwa Vent Shaft & Bulk Power Supply Project footprints. However, it is the opinion of the author of this Archaeological Impact Assessment Report that the proposed Borwa Vent Shaft & Bulk Power Supply Project on portions of the farm Thorncliffe 374 KT may proceed from a culture resources management perspective, provided that mitigation measures are implemented and no previously undetected heritage remains are found at any point in construction and operational phases

6.3.1 Archaeology

The project area is situated in a rich archaeological landscape with Stone Age and Iron Age remnants occurring throughout. The study identified single Historical Period archaeological features which will be directly impacted by the proposed project but these occurrences are of low significance. As such, the impact on the resources is considered to be LOW, provided that no previously undetected archaeological remains are found in the area.

6.3.2 Built Environment

The study did not identify any buildings or structures which will be impacted by the proposed project. This is confirmed by an examination of aerial photographs of the area. No impact on built environment sites is therefore anticipated.

6.3.3 Cultural Landscape

The larger Steelpoort area comprises a rich cultural landscape and tangible and intangible heritage aspects associated with local communities are abundant. A site of apparent ritual importance to local communities occurs in the project area. The stone feature is of medium heritage significance due to its implied local social and ritual value and direct impact on the site is expected to be HIGH but the impact can be mitigated to a LOW impact. Generally, the general landscape surrounding the proposed project areas have been transformed by mining, human settlement and agriculture. Further away from the project area, the landscape is typical of Sekhukhune, with large areas of undulating hills, large mountains to the south and north and 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.

6.3.4 Graves / Human Burials Sites

No graves of human burial places were noted during the site investigation but it is likely that graves might occur in association with the Historical Period settlement areas and there is a possibility that burials might be encountered. 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.

6.4 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.

The following recommendations are made for the Historical Period Features of medium-low significance (Site EXIGO-TC374-HP01, Site EXIGO-TC374-HP02) and located within project development areas.

PROJECT COMPONENT/S	All phases of construction and operation.		
POTENTIAL IMPACT	Damage/disturbance to sites and subsurface features and deposits.		
ACTIVITY RISK/SOURCE	Digging foundations and trenches into sensitive deposits that are not visible at the surface.		
MITIGATION: TARGET/OBJECTIVE	To the historical fabric and conserve existing, and locate undetected heritage remains as soon as possible after disturbance so as to maximize the chances of successful rescue/mitigation work.		
MITIGATION: ACTION/CONTROL	RESPONSIBILITY	TIMEFRAME	
Alternative Mitigation Procedure (if preferred mitigation procedure is not feasible)			
Destruction Permitting: Apply for destruction permit if impacted on.	QUALIFIED HERITAGE SPECIALIST	Prior to the commencement of construction and earth-moving.	
Fixed Mitigation Procedure (required)			
Site Monitoring: Regular examination of trenches and excavations.	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.		

The following recommendations are made for the potentially significant ritual site occurring in the project area (Site EXIGO-TC374-FT01) in terms of heritage management and mitigation:

PROJECT COMPONENT/S	All phases of construction and operation.	
POTENTIAL IMPACT	Damage/disturbance to subsurface burials and surface burial features.	
ACTIVITY RISK/SOURCE	Digging foundations and trenches into sensitive deposits that are not visible at the surface.	
MITIGATION: TARGET/OBJECTIVE	To locate human burials as soon as possible after disturbance so as to maximize the chances of successful rescue/mitigation work.	
MITIGATION: ACTION/CONTROL	RESPONSIBILITY	TIMEFRAME
Preferred Mitigation Procedure		
Avoidance & Redesign: Implement a strict heritage conservation buffer of at least 20m around the feature, redesign the footprint area (ventilation shaft platform, borrow pit, access road, power line) to avoid the heritage resource and the proposed conservation buffer. Fence the site and apply access control. Consideration could be given to the downgrading of site significance and removal of the buffer requirement if the function of the feature is established and site context is confirmed to be low by means of stakeholder engagement and consultation with informants familiar with the history and local knowledge of the project property and the cultural landscape.	DEVELOPER QUALIFIED HERITAGE SPECIALIST	Prior to the commencement of construction and earth-moving, monitoring during construction.
Alternative Mitigation Procedure (if preferred mitigation procedure is not feasible)		
Destruction Permitting: If impacted on, conduct full social consultation process with affected parties regarding significance of site, possible conservation management and protection measures. Apply for destruction permit from heritage authorities and affected parties if/when required.	QUALIFIED HERITAGE SPECIALIST	Prior to the commencement of construction and earth-moving.
Fixed Mitigation Procedure (required)		
Site Monitoring: Regular examination of trenches and excavations in this area in order to avoid the destruction of previously undetected burials or heritage remains. If burials were to be retained a strict site management and monitoring protocol will be required (planning, construction phases).	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.	

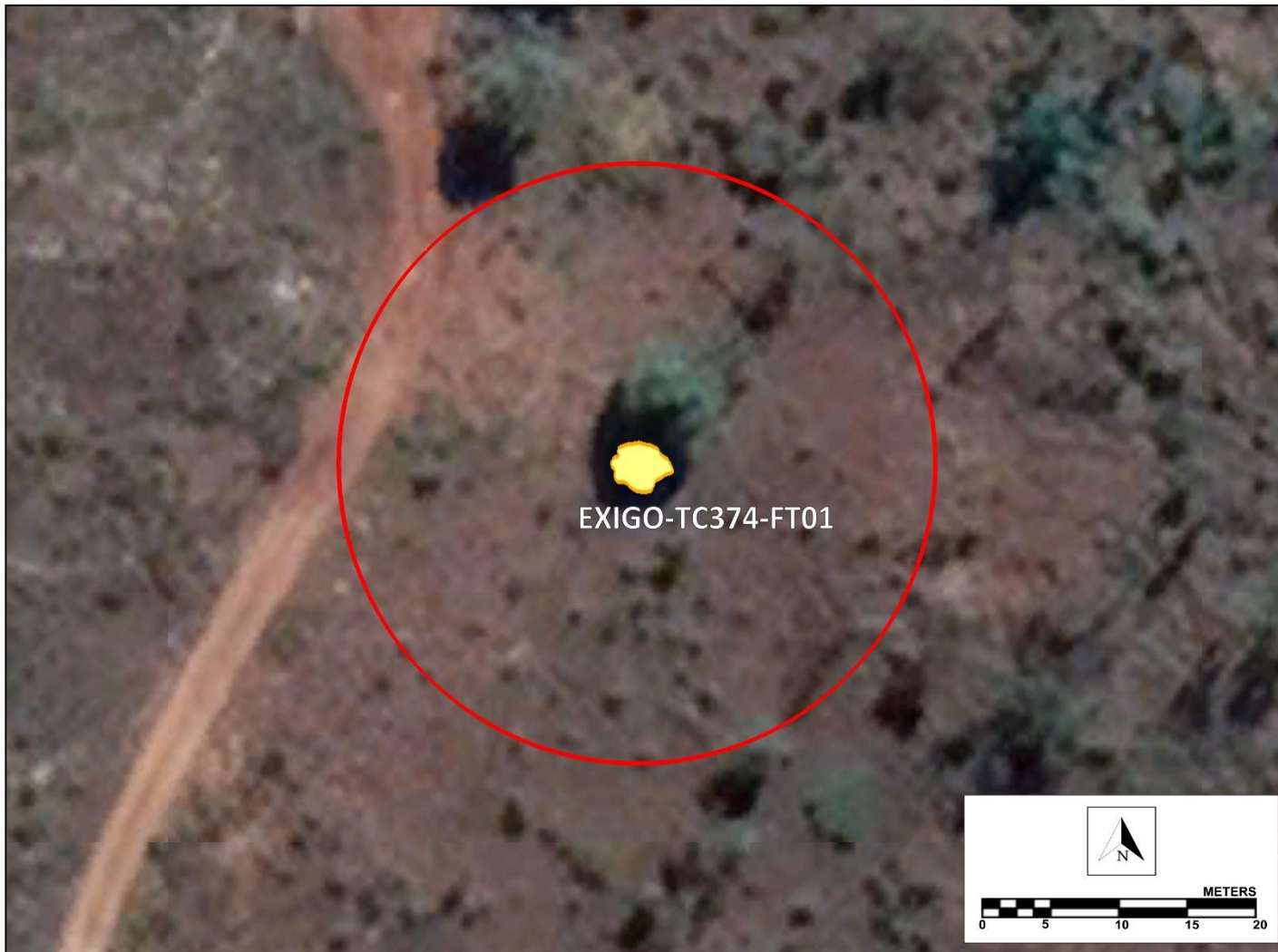


Figure 6-8: Aerial map indicating the recommended conservation buffer of 20m for EXIGO-TC374-FT01.

7 RECOMMENDATIONS

Previous studies conducted in the Steelpoort region suggest a rich and diverse archaeological landscape but the surroundings of some of the areas in the proposed Borwa Vent Shaft & Bulk Power Supply Project have been transformed by mining, prospecting and other developments. Cognisance should nonetheless be taken of archaeological material that might be present in surface and sub-surface deposits along drainage lines and in pristine areas. Heritage resources occur within the proposed project areas and the following recommendations are made based on general observations.

- The remains of two Historical Period settlement areas consisting out of stone wall enclosures, lower grind stones, middens and material culture such as glass and metal (as **Site EXIGO-TC374-HP01** and **Site EXIGO-TC374-HP02**) are of medium-low significance due to the more recent provenience and poor preservation of the sites. The sites occur within proposed project development areas and it is recommended that the general area be closely monitored in order to avoid the destruction of previously undetected heritage remains – particularly potential burials associated with the settlements. In addition, application should be made for a destruction permit from the relevant heritage authorities should the possible Historical Period site be impacted on, altered or destroyed.
- The larger Steelpoort area comprises a rich cultural landscape and tangible and intangible heritage aspects associated with local communities are abundant. A site of apparent ritual importance was pointed out by a mine employee (**Site EXIGO-TC374-FT01**). The site, which consists of a stone cairn under a tree is potentially of medium heritage significance due to its implied local social and ritual value. It is located within proposed project development areas and it is primarily recommended that a strict heritage conservation buffer of at least 20m be implemented around the feature. Here, the redesign the footprint areas of the ventilation shaft platform, borrow pit, access road and power lines would be necessary to avoid the heritage resource and the proposed conservation buffer. It is advisable that the site be fenced and that access control be applied. Generally, careful monitoring should be conducted by a heritage specialist or an informed Environmental Control Officer (ECO) in order to detect any potential impact on the site at the earliest opportunity. However, should impact on the site prove inevitable a full social consultation process with affected parties / communities regarding significance of site, possible conservation management and protection measures will be required. Application should be made for a destruction permit from heritage authorities and affected parties if/when required. Consideration could be given to the downgrading of site significance and removal of the buffer requirement if the function of the feature is established and site context is confirmed to be low by means of stakeholder engagement and consultation with informants familiar with the history and local knowledge of the project property and the cultural landscape that surrounds it.
- It is essential that cognisance be taken of the larger heritage landscape of the area in order to avoid the destruction of previously undetected heritage sites. It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the Study Area along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period. As such, the general monitoring of the development progress by an ECO or by the heritage specialist is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately.

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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 m² in extent; or
 - (ii) involving three or more existing erven or subdivisions thereof; or
 - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
- (d) the re-zoning of a site exceeding 10 000 m² in extent; or
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority,

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

And:

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

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

Consequently, section 35 of the Act requires Heritage Impact Assessments (HIAs) or Archaeological Impact Assessments (AIAs) to be done for such developments in order for all heritage resources, that is, all places or objects of aesthetics, architectural, historic, scientific, social, spiritual, linguistic or technological value or significance to be protected. Thus any assessment should make provision for the protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60

years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects. Heritage resources management and conservation.

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		Score
<i>(The severity of negative impacts, or how beneficial positive impacts would be on a particular affected system or affected party)</i>		
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).

		COMPOSITE DURATION, EXTENT & PROBABILITY SCORE									
		3	4	5	6	7	8	9	10	11	12
SEVERITY	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
		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 <i>(The combination of all the above criteria as an overall significance)</i>	
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. <i>Example: The loss of a species would be viewed by informed society as being of VERY HIGH significance.</i> <i>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.</i>	
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. <i>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.</i> <i>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.</i>	
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. <i>Example: The loss of a sparse, open vegetation type of low diversity may be regarded as MODERATELY significant.</i>	
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. <i>Example: The temporary changes in the water table of a wetland habitat, as these systems are adapted to fluctuating water levels.</i> <i>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.</i>	
NO SIGNIFICANCE	
There are no primary or secondary effects at all that are important to scientists or the public. <i>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.</i>	
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. <i>Example: The effect of a particular development on people's psychological perspective of the environment.</i>	

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

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

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

11.2 Impact Assessment Criteria

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

Significance of the heritage resource

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

HERITAGE CONTEXT	TYPE OF DEVELOPMENT			
	CATEGORY A	CATEGORY B	CATEGORY C	CATEGORY D
CONTEXT 1 High heritage Value	Moderate heritage impact expected	High heritage impact expected	Very high heritage impact expected	Very high heritage impact expected
CONTEXT 2 Medium to high heritage value	Minimal heritage impact expected	Moderate heritage impact expected	High heritage impact expected	Very high heritage impact expected
CONTEXT 3 Medium to low heritage value	Little or no heritage impact expected	Minimal heritage impact expected	Moderate heritage impact expected	High heritage impact expected
CONTEXT 4 Low to no heritage value	Little or no heritage impact expected	Little or no heritage impact expected	Minimal heritage value expected	Moderate heritage impact expected
NOTE: A DEFAULT "LITTLE OR NO HERITAGE IMPACT EXPECTED" VALUE APPLIES WHERE A HERITAGE RESOURCE OCCURS OUTSIDE THE IMPACT ZONE OF THE DEVELOPMENT.				
HERITAGE CONTEXTS	CATEGORIES OF DEVELOPMENT			
<p>Context 1: Of high intrinsic, associational and contextual heritage value within a national, provincial and local context, i.e. formally declared or potential Grade 1, 2 or 3A heritage resources</p> <p>Context 2: Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade 3B heritage resources.</p> <p>Context 3:</p>	<p>Category A: Minimal intensity development</p> <ul style="list-style-type: none"> - No rezoning involved; within existing use rights. - No subdivision involved. - Upgrading of existing infrastructure within existing envelopes - Minor internal changes to existing structures - New building footprints limited to less than 1000m². <p>Category B: Low-key intensity development</p> <ul style="list-style-type: none"> - Spot rezoning with no change to overall zoning of a site. - Linear development less than 100m 			

<p>Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade 3C heritage resources</p> <p>Context 4: Of little or no intrinsic, associational or contextual heritage value due to disturbed, degraded conditions or extent of irreversible damage.</p>	<ul style="list-style-type: none"> - Building footprints between 1000m2-2000m2 - Minor changes to external envelop of existing structures (less than 25%) - Minor changes in relation to bulk and height of immediately adjacent structures (less than 25%). <p>Category C: Moderate intensity development</p> <ul style="list-style-type: none"> - Rezoning of a site between 5000m2-10 000m2. - Linear development between 100m and 300m. - Building footprints between 2000m2 and 5000m2 - Substantial changes to external envelop of existing structures (more than 50%) - Substantial increase in bulk and height in relation to immediately adjacent buildings (more than 50%) <p>Category D: High intensity development</p> <ul style="list-style-type: none"> - Rezoning of a site in excess of 10 000m2 - Linear development in excess of 300m. - Any development changing the character of a site exceeding 5000m2 or involving the subdivision of a site into three or more erven. - Substantial increase in bulk and height in relation to immediately adjacent buildings (more than 100%)
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11.4 Management and Mitigation Actions

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

<p>No further action / Monitoring</p> <p>Where no heritage resources have been documented, heritage resources occur well outside the impact zone of any development or the primary context of the surroundings at a development footprint has been largely destroyed or altered, no further immediate action is required. Site monitoring during development, by an ECO or the heritage specialist are often added to this recommendation in order to ensure that no undetected heritage\ remains are destroyed.</p> <p>Avoidance</p> <p>This is appropriate where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have a high negative impact. Mitigation is not acceptable or not possible. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources.</p> <p>Mitigation</p> <p>This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated to a degree of medium to low significance, e.g. the high to medium impact of a development on an archaeological site could be mitigated through sampling/excavation of the remains. Not all negative impacts can be mitigated.</p> <p>Compensation</p> <p>Compensation is generally not an appropriate heritage management action. The main function of management actions should be to conserve the resource for the benefit of future generations. Once lost it cannot be renewed. The circumstances around the potential public or heritage benefits would need to be exceptional to warrant this type of action, especially in the case of where the impact was high.</p> <p>Rehabilitation</p> <p>Rehabilitation is considered in heritage management terms as a intervention typically involving the adding of a new heritage layer to enable a new sustainable use. It is not appropriate when the process necessitates the removal of previous historical layers, i.e. restoration of a building or place to the previous state/period. It is an appropriate heritage management action in the following cases:</p> <ul style="list-style-type: none"> - The heritage resource is degraded or in the process of degradation and would benefit from rehabilitation. - Where rehabilitation implies appropriate conservation interventions, i.e. adaptive reuse, repair and maintenance, consolidation and minimal loss of historical fabric. - Where the rehabilitation process will not result in a negative impact on the intrinsic value of the resource. <p>Enhancement</p>
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