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**PHASE 1 HIA REPORT FOR THE PROPOSED DASSIERAND SOCIAL HOUSING DEVELOPMENT
IN DASSIERAND TOWNSHIP LOCATED ON PORTION 435
OF POTCHEFSTROOM TOWN & TOWNLANDS 435IQ
IN POTCHEFSTROOM, NORTHWEST PROVINCE**

For:

C&K ENVIRONMENTAL SERVICES (PTY) LTD

REPORT: **APAC021/36**

by:

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May 2021

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A handwritten signature in black ink, appearing to be 'A. Pelser', is centered below the disclaimer text.

SUMMARY

APelser Archaeological Consulting (APAC) was appointed by C&K Environmental Services (Pty) Ltd to conduct a Phase 1 HIA for the proposed Dassierand Social Housing Development in Dassierand Township. The study and development area is located on Portion 435 of Potchefstroom Town & Townlands 435IQ, in Potchefstroom, Northwest Province.

Background research indicates that there are some cultural heritage sites and features in the larger geographical area within which the study area falls. No cultural heritage (archaeological and/or historical) sites, features and material resources were identified in the study area during the field assessment. This report discusses the results of both the background research and physical assessment.

From a Cultural Heritage perspective it is recommended that the proposed development should be allowed to continue taking the measures provided at the end into consideration.

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1. INTRODUCTION

APelser Archaeological Consulting (APAC) was appointed by C&K Environmental Services (Pty) Ltd to conduct a Phase 1 HIA for the proposed Dassierand Social Housing Development in Dassierand Township. The study and development area is located on Portion 435 of Potchefstroom Town & Townlands 435IQ, in Potchefstroom, Northwest Province.

Background research indicates that there are some cultural heritage sites and features in the larger geographical area within which the study area falls. No cultural heritage (archaeological and/or historical) sites, features and material resources were identified in the study area during the field assessment.

The client indicated the location and boundaries of the study area and the assessment concentrated on this portion.

2. TERMS OF REFERENCE

The Terms of Reference for the study was to:

1. Identify all objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located on the portion of land that will be impacted upon by the proposed development;
2. Assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value;
3. Describe the possible impact of the proposed development on these cultural remains, according to a standard set of conventions;
4. Propose suitable mitigation measures to minimize possible negative impacts on the cultural resources;
5. Review applicable legislative requirements;

3. LEGISLATIVE REQUIREMENTS

Aspects concerning the conservation of cultural resources are dealt with mainly in two acts. These are the National Heritage Resources Act (Act 25 of 1999) and the National Environmental Management Act (Act 107 of 1998).

3.1. The National Heritage Resources Act

According to the Act the following is protected as cultural heritage resources:

- a. Archaeological artifacts, structures and sites older than 100 years
- b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography

- c. Objects of decorative and visual arts
- d. Military objects, structures and sites older than 75 years
- e. Historical objects, structures and sites older than 60 years
- f. Proclaimed heritage sites
- g. Grave yards and graves older than 60 years
- h. Meteorites and fossils
- i. Objects, structures and sites of scientific or technological value.

The National Estate includes the following:

- a. Places, buildings, structures and equipment of cultural significance
- b. Places to which oral traditions are attached or which are associated with living heritage
- c. Historical settlements and townscapes
- d. Landscapes and features of cultural significance
- e. Geological sites of scientific or cultural importance
- f. Sites of Archaeological and palaeontological importance
- g. Graves and burial grounds
- h. Sites of significance relating to the history of slavery
- i. Movable objects (e.g. archaeological, palaeontological, meteorites, geological specimens, military, ethnographic, books etc.)

A Heritage Impact Assessment (HIA) is the process to be followed in order to determine whether any heritage resources are located within the area to be developed as well as the possible impact of the proposed development thereon. An Archaeological Impact Assessment (AIA) only looks at archaeological resources. An HIA must be done under the following circumstances:

- a. The construction of a linear development (road, wall, power line, canal etc.) exceeding 300m in length
- b. The construction of a bridge or similar structure exceeding 50m in length
- c. Any development or other activity that will change the character of a site and exceed 5 000m² or involve three or more existing erven or subdivisions thereof
- d. Re-zoning of a site exceeding 10 000 m²
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority

Structures

Section 34 (1) of the Act states that no person may demolish any structure or part thereof which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

A structure means any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith.

Alter means any action affecting the structure, appearance or physical properties of a place or object, whether by way of structural or other works, by painting, plastering or the decoration or any other means.

Archaeology, palaeontology and meteorites

Section 35(4) of the Act deals with archaeology, palaeontology and meteorites. The act states that no person may, without a permit issued by the responsible heritage resources authority (national or provincial)

- a. destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or paleontological site or any meteorite;
- b. destroy, damage, excavate, remove from its original position, collect or own any archaeological or paleontological 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 paleontological material or object, or any meteorite; or
- d. bring onto or use at an archaeological or paleontological site any excavation equipment or any equipment that assists in the detection or recovery of metals or archaeological and paleontological material or objects, or use such equipment for the recovery of meteorites.
- e. alter or demolish any structure or part of a structure which is older than 60 years as protected.

The above mentioned may only be disturbed or moved by an archaeologist, after receiving a permit from the South African Heritage Resources Agency (SAHRA). In order to demolish such a site or structure, a destruction permit from SAHRA will also be needed.

Human remains

Graves and burial grounds are divided into the following:

- 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

In terms of Section 36(3) of the National Heritage Resources Act, no person may, without a permit issued by the relevant heritage resources authority:

- a. destroy, damage, alter, exhume or remove from its original position of 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 or 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; or
- c. bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation, or any equipment which assists in the detection or recovery of metals.

Human remains that are less than 60 years old are subject to provisions of the Human Tissue Act (Act 65 of 1983) and to local regulations. Exhumation of graves must conform to the standards set out in the **Ordinance on Excavations (Ordinance no. 12 of 1980)** (replacing the old Transvaal Ordinance no. 7 of 1925).

Permission must also be gained from the descendants (where known), the National Department of Health, Provincial Department of Health, Premier of the Province and local police. Furthermore, permission must also be gained from the various landowners (i.e. where the graves are located and where they are to be relocated to) before exhumation can take place.

Human remains can only be handled by a registered undertaker or an institution declared under the **Human Tissues Act (Act 65 of 1983 as amended)**.

3.2. The National Environmental Management Act

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

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

4. METHODOLOGY

4.1. Survey of literature

A survey of available literature was undertaken in order to place the development area in an archaeological and historical context. The sources utilized in this regard are indicated in the bibliography.

4.2. Field survey

The field assessment section of the study was conducted according to generally accepted HIA practices and aimed at locating all possible objects, sites and features of heritage significance in the area of the proposed development. The location/position of all sites,

features and objects is determined by means of a Global Positioning System (GPS) where possible, while detail photographs are also taken where needed.

4.3. Oral histories

People from local communities are sometimes interviewed in order to obtain information relating to the surveyed area. It needs to be stated that this is not applicable under all circumstances. When applicable, the information is included in the text and referred to in the bibliography.

4.4. Documentation

All sites, objects, features and structures identified are documented according to a general set of minimum standards. Co-ordinates of individual localities are determined by means of the Global Positioning System (GPS). The information is added to the description in order to facilitate the identification of each locality.

5. DESCRIPTION OF THE AREA

The study and development area is situated on Portion 435 of Potchefstroom Town & Townlands 435IQ, in Potchefstroom, Northwest Province.

The study area's topography is generally flat and open with no rocky outcrops or ridges present. Vegetation (grass and tree cover) was fairly dense during the assessment but visibility on the ground was good. The development area is surrounded by already established and ongoing urban residential developments (housing and other) and as a result the larger area has been completely altered from its original character in recent years. The surrounding area and study area itself would have been used in the past for agricultural purposes as well and it is assumed that if any significant archaeological and/or historical sites, features or material did exist here in the past it would have been largely disturbed or destroyed as a result. Some informal dumping of building material and other household refuse occurs throughout the study area.

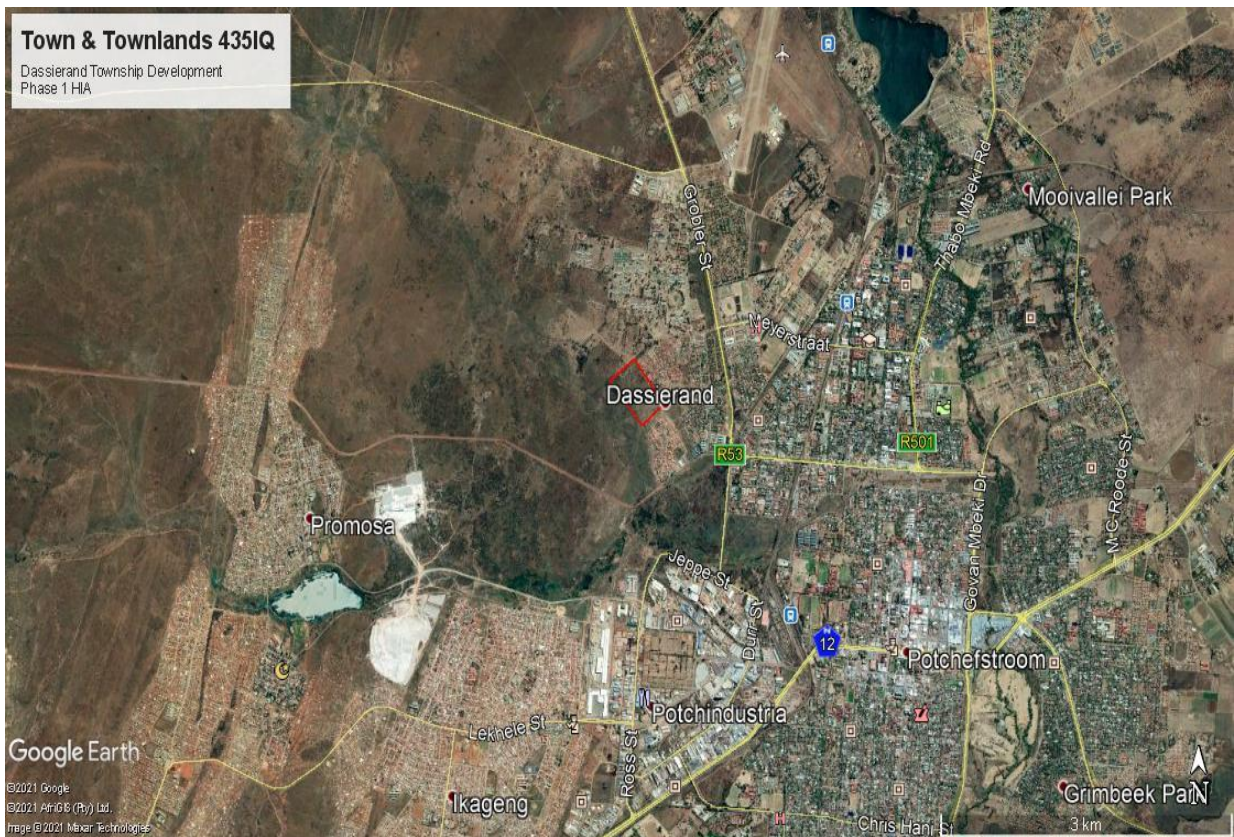
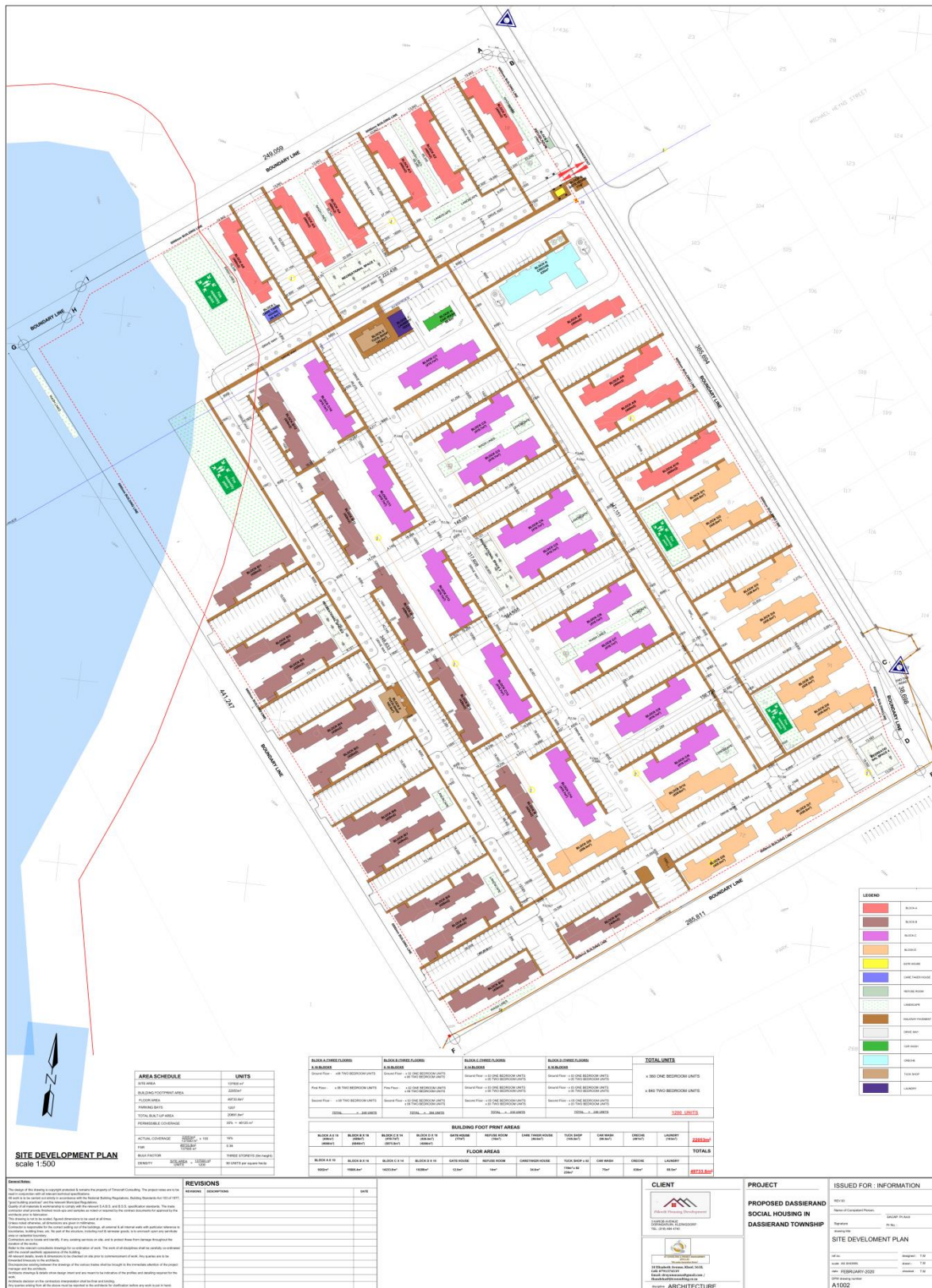


Figure 1: General location of the study & development area (Google Earth 2021).



Figure 2: Closer view of approximate study area and development footprint (Google Earth 2021).



6. DISCUSSION

The Stone Age is the period in human history when lithic (stone) material was mainly used to produce tools. In South Africa the Stone Age can be divided in basically into three periods. It is however important to note that dates are relative and only provide a broad framework for interpretation. A basic sequence for the South African Stone Age (Lombard et.al 2012) is as follows:

Earlier Stone Age (ESA) up to 2 million – more than 200 000 years ago
Middle Stone Age (MSA) less than 300 000 – 20 000 years ago
Later Stone Age (LSA) 40 000 years ago – 2000 years ago

It should also be noted that these dates are not a neat fit because of variability and overlapping ages between sites (Lombard et.al 2012: 125).

Based on Bergh (1999: 4 – 5) there are no known Stone Age sites in the study area, although there are some known in the Vredefort Dome area. The fact that there are no known Stone Age sites in the area might be indicative of the lack of Stone Age research.

During a 2017 assessment a number of Stone Age tool scatters were identified on a portion of the farm Vyfhoek 424IQ in Potchefstroom (Pelser 2017: 15-19). **No Stone Age sites or material were found on the property during the May 2021 study however.**

The Iron Age is the name given to the period of human history when metal was mainly used to produce metal artifacts. In South Africa it can be divided in two separate phases (Bergh 1999: 96-98), namely:

Early Iron Age (EIA) 200 – 1000 A.D
Late Iron Age (LIA) 1000 – 1850 A.D.

Huffman (2007: xiii) however indicates that a Middle Iron Age should be included. His dates, which now seem to be widely accepted in archaeological circles, are:

Early Iron Age (EIA) 250 – 900 A.D.
Middle Iron Age (MIA) 900 – 1300 A.D.
Late Iron Age (LIA) 1300 – 1840 A.D.

No Early Iron Age sites are known to exist in the area, although there is a fairly large number of Late Iron Age stone walled sites in the bigger geographical area that includes Potchefstroom, Parys, Klerksdorp and other towns (Bergh 1999: 6-7). The author of this report worked extensively on LIA sites in the Dome area. According the Huffman's research the LIA sites in the larger area could belong to various facies of the Urewe pottery tradition, including Ntsuanatsatsi, Uitkomst, Olifantspoort, Thabeng and Buispoort. These facies (or pottery traditions) date to between AD1450 and AD1840, and was found at sites like Buffelshoek in the Vredefort Dome area by Mike Taylor (Huffman 2007: 167; 171; 191, 195 and 203).

No Iron Age sites, features or material were identified in the study area during the May 2021 assessment.

The historical period started with the moving into the area by the first Europeans. The first group to move through the area was that of Cornwallis Harris in 1836 (Bergh 1999: 13), closely followed by the Voortrekkers and white farmers, with Potchefstroom one of the earliest towns established in the trans-Vaal in 1839 (Bergh 1999: 14; 89). During the Anglo-Transvaal War (1880-1881) a British garrison in Potchefstroom was besieged by the Boers (Bergh 1999: 47), while during the Anglo-Boer War (1899-1902) there were a number of skirmishes and battles around the area, such as a Frederikstad (p.51; 54), while there was a Black concentration camp at Frederikstad and a white concentration camp west of Potchefstroom (Bergh 1999: 54).

No historical sites, features or material were identified on the property during the May 2021 field assessment.

The oldest map that could be obtained in the Chief Surveyor General's database (www.csg.dla.gov.za) dates to 1904 and it shows that Portion 1 of Potchestroom Town & Townlands was at the time located in the Ward of Mooi River (later Potchefstroom) of the then Transvaal Colony (CSG Document 10JMZ601). Portion 1 was surveyed in June 1903 for one G. Stonham. Portion 435 was surveyed between August 1974 and February 1975 (CSG Document 10JE3E01).

No historical sites or features are shown on these two maps.

Form B—Diagram Form for a Sub-division of an Original Diagram of a whole Farm

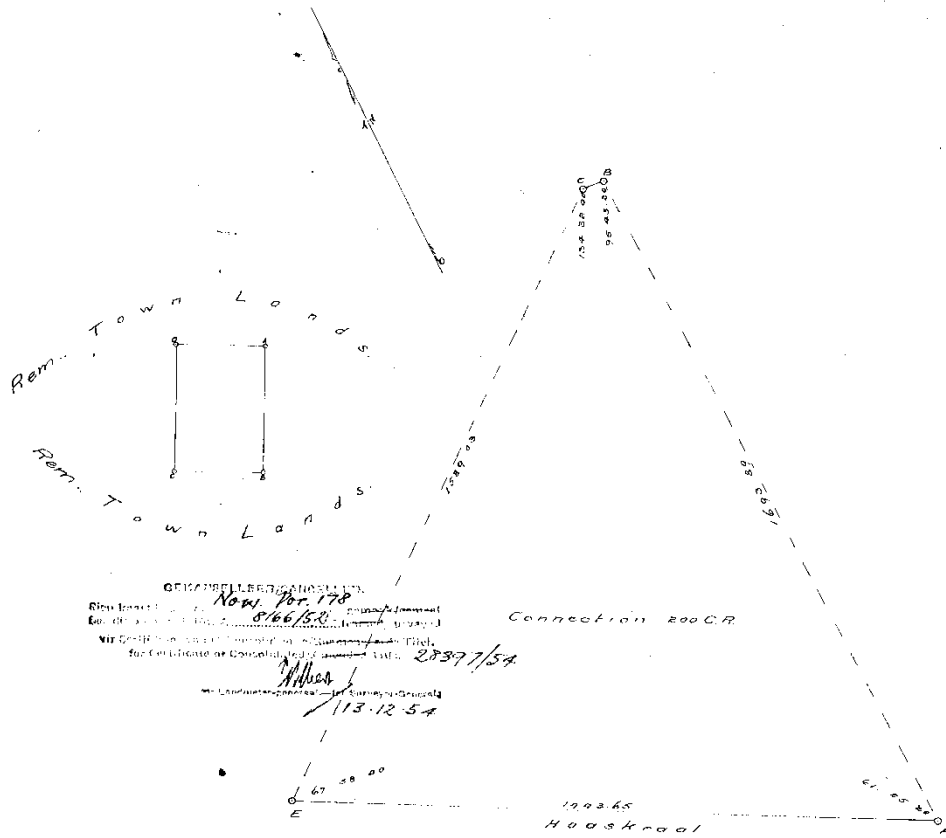
SIDES		ANGLES		(Y) CO-ORDINATES (X)	
AB	75.00	A	90.0.0	A	-
BC	50.00	B	90.0.0	B	-1180.90 + 526.81
CD	75.00	C	90.0.0	C	-1200.77 + 550.40
DA	50.00	D	90.0.0	D	-
				E	-2923.80 - 499.13
				F	-1138.93 - 1146.91

No. 4222/04 Examined. The numerical data of this Diagram are sufficiently consistent. *W.A.C.*
Approved

W.A.C.
Surveyor-General
Surveyor-General's Office,
Pretoria. 7-SEP.1904

This Diagram belongs to Deed of Transfer No. issued this day in favour of *4222/04*

Deeds Office,
Pretoria. Registrar of Deeds



GEOMETRIE VAN DE LIGTING
Now No. 178
No. 4222/04
Vir die... 2039/54
113.12.54

Tans geregistreer onder :
Now registered under :
No. 435
REGISTRASIE AFDELING
REGISTRATION DIVISION

The above Diagram lettered *A B C D* represents *6* Morgen *150* Square Rods of Land, being *Portion 1* of the Farm *POTCHEFSTROOM TOWN LANDS, 135* at *1904* Ward *Potchefstroom* *Moer River* Transvaal Colony, and was surveyed in *June 1903* by Deed of Grant No. *4222/04* by Surveyor *W.A.C.* for *G. Stanham* by me *W.A.C.*

Figure 4: A 1904 map of Portion 1 of Potchefstroom Town & Townlands 435IQ (www.csg.dla.gov.za).

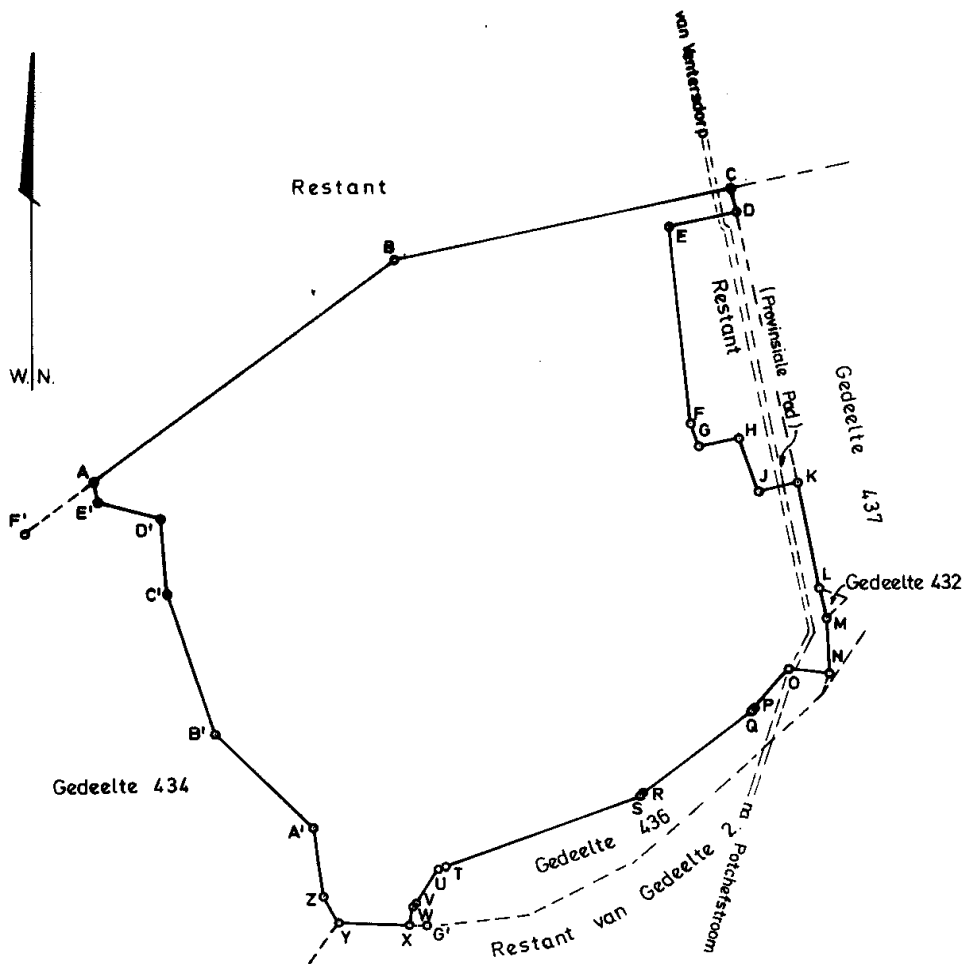
G. J. Vermeulen

nms. Landmeter-generaal.

15-9-1975

BAKFNDESKRYWING.

- A, B, C, D, E, F, G, H, J, K, L, N, X,
- Y, Z, A', B', C', D', E', F'..... 900mm Ysterpaal en klipstapel.
- P, Q, R, S, T, U, V, W..... Betonpaal in beton.
- M..... 12mm Ysterpen en klipstapel.
- O..... Ysterspoorstaafhoekdraadpaal in beton
- G'..... Gat in betonblok.



SKAAL 1:12 500

G. J. Vermeulen

Opgemeet in Augustus 1974 deur my.
tot Februarie 1975

Landmeter

Figure 5: A 1975 map of Portion 435 of the farm (www.csg.dla.gov.za).

Results of the May 2021 study area assessment

No sites, features or material of cultural heritage (archaeological and/or historical) origin or significance were identified in the study area during the assessment. The area has been utilized in the recent past for agricultural purposes (ploughing/crop growing) and as a result would have been cleared and disturbed extensively over the years. Informal dumping of building material/rubble, and other household refuse also occurs throughout the area.

Possible graves, reported to the Specialist prior to the assessment, turned out to be stone heaps which are more than likely the result of recent clearing in the area and the dumping of material. The area is also surrounded and bordered by existing fairly recent housing developments, and much of the building rubble dumped in the study could be from the earlier building activities in these developments.

An older (2005) aerial image (Google Earth) of the study area also shows the open and flat nature of the area, and no evidence of the presence of any structures or remains. From this image it also clear that the area had been used for agricultural purposes in the past. If there were any sites, features or structures of archaeological or historical origin and nature prior to these activities, it would have been extensively disturbed or destroyed as a result.



Figure 6: A 2005 view of the study area & approximate development footprint. The area is open and flat and remnants of earlier agricultural activities are visible. No cultural heritage sites, features or structures can be seen (Google Earth 2021).



Figure 7: A general view of a section of the area. Note how flat and open it is and also note the building material dumped here.



Figure 8: Another view.



Figure 9: A view of the possible location of graves in the area.



Figure 10: Closer view of some of the stone heaps here.



Figure 11: Another general view of the study and development area.



Figure 12: The area is surrounded and bordered by a number of recent and existing housing developments.



Figure 13: A general view of part of the area.



Figure 14: In some sections the vegetation was more dense and made access & visibility difficult.



Figure 15: Further evidence of the informal dumping of building rubble and other material in the area.

Based on the field assessment, aerial images and background study conducted, from a Cultural Heritage point of view, it can be concluded that the development should be allowed to continue.

Finally, it should be noted that although all efforts are made to cover a total area during any assessment and therefore to identify all possible sites or features of cultural (archaeological and/or historical) heritage origin and significance, that there is always the possibility of something being missed. This will include low stone-packed or unmarked graves. This aspect should be kept in mind when development work commences and if any sites (including graves) are identified then an expert should be called in to investigate and recommend on the best way forward.

7. CONCLUSIONS AND RECOMMENDATIONS

APelser Archaeological Consulting (APAC) was appointed by C&K Environmental Services (Pty) Ltd to conduct a Phase 1 HIA for the proposed Dassierand Social Housing Development in Dassierand Township. The study and development area is located on Portion 435 of Potchefstroom Town & Townlands 435IQ, in Potchefstroom, Northwest Province.

Background research indicates that there are some cultural heritage sites and features in the larger geographical area within which the study area falls. No sites, features or material of cultural heritage (archaeological and/or historical) origin or significance were identified in

the study area during the assessment. The area has been utilized in the recent past for agricultural purposes (ploughing/crop growing) and as a result would have been cleared and disturbed extensively over the years. Informal dumping of building material/rubble, and other household refuse also occurs throughout the area.

Possible graves, reported to the Specialist prior to the assessment, turned out to be stone heaps which are more than likely the result of recent clearing in the area and the dumping of material. The area is also surrounded and bordered by existing fairly recent housing developments, and much of the building rubble dumped in the study could be from the earlier building activities in these developments.

Older aerial images of the study area also show the open and flat nature of the area, and no evidence of the presence of any structures or remains. From this it is also clear that the area had been used for agricultural purposes in the past. If there were any sites, features or structures of archaeological or historical origin and nature prior to these activities, it would have been extensively disturbed or destroyed as a result.

It should be noted that although all efforts are made to locate, identify and record all possible cultural heritage sites and features (including archaeological remains) there is always a possibility that some might have been missed as a result of grass cover and other factors. The subterranean nature of these resources (including low stone-packed or unmarked graves) should also be taken into consideration. Should any previously unknown or invisible sites, features or material be uncovered during any development actions then an expert should be contacted to investigate and provide recommendations on the way forward.

Finally, from a Cultural Heritage point of view the proposed Dassierand Social Housing Development in Dassierand Township, situated on Portion 435 of Potchefstroom Town & Townlands 435IQ should be allowed continue taking the above recommendations into consideration.

8. REFERENCES

General and Closer views of study area location and approximate development footprint: Google Earth 2021.

Site Development Plans: Provided by C&K Environmental Services (Pty) Ltd.

Bergh, J.S. (red.). 1999. **Geskiedenisatlas van Suid-Afrika. Die vier noordelike provinsies**. Pretoria: J.L. van Schaik.

Huffman, T.N. 2007. Handbook to the Iron Age: **The Archaeology of Pre-Colonial Farming Societies in Southern Africa**. Scottsville: University of KwaZulu-Natal Press.

Knudson, S.J. 1978. **Culture in retrospect**. Chicago: Rand McNally College Publishing Company.

Lombard, M., L. Wadley, J. Deacon, S. Wurz, I. Parsons, M. Mohapi, J. Swart & P. Mitchell. 2012. **South African and Lesotho Stone Age Sequence Updated (I)**. South African Archaeological Bulletin 67 (195): 120–144, 2012.

Pelser, A.J. 2017. **Report on a Phase 1 Heritage Assessment for the Overhead Powerline and Zeta Substation, located on Erf 1806 Van Der Hoff Park & Portion 17 of the farm Vyfhoek 424IQ Potchefstroom, Northwest Province**. Unpublished Report APelser Archaeological Consulting cc. APAC017/26. For: AB Enviro Consult. April 2017.

Republic of South Africa. 1999. **National Heritage Resources Act** (No 25 of 1999). Pretoria: the Government Printer.

Republic of South Africa. 1998. **National Environmental Management Act** (no 107 of 1998). Pretoria: The Government Printer.

Chief Surveyor General Database (www.csg.dla.gov.za): Documents 10JMZ601 & 10JE3E01.

APPENDIX A: DEFINITION OF TERMS:

Site: A large place with extensive structures and related cultural objects. It can also be a large assemblage of cultural artifacts, found on a single location.

Structure: A permanent building found in isolation or which forms a site in conjunction with other structures.

Feature: A coincidental find of movable cultural objects.

Object: Artifact (cultural object).

(Also see Knudson 1978: 20).

APPENDIX B: DEFINITION/ STATEMENT OF HERITAGE SIGNIFICANCE

Historic value: Important in the community or pattern of history or has an association with the life or work of a person, group or organization of importance in history.

Aesthetic value: Important in exhibiting particular aesthetic characteristics valued by a community or cultural group.

Scientific value: Potential to yield information that will contribute to an understanding of natural or cultural history or is important in demonstrating a high degree of creative or technical achievement of a particular period

Social value: Have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

Rarity: Does it possess uncommon, rare or endangered aspects of natural or cultural heritage.

Representivity: Important in demonstrating the principal characteristics of a particular class of natural or cultural places or object or a range of landscapes or environments characteristic of its class or of human activities (including way of life, philosophy, custom, process, land-use, function, design or technique) in the environment of the nation, province region or locality.

APPENDIX C: SIGNIFICANCE AND FIELD RATING:

Cultural significance:

- Low: A cultural object being found out of context, not being part of a site or without any related feature/structure in its surroundings.
- Medium: Any site, structure or feature being regarded less important due to a number of factors, such as date and frequency. Also any important object found out of context.
- High: Any site, structure or feature regarded as important because of its age or uniqueness. Graves are always categorized as of a high importance. Also any important object found within a specific context.

Heritage significance:

- Grade I: Heritage resources with exceptional qualities to the extent that they are of national significance
- Grade II: Heritage resources with qualities giving it provincial or regional importance although it may form part of the national estate
- Grade III: Other heritage resources of local importance and therefore worthy of conservation

Field ratings:

- i. National Grade I significance: should be managed as part of the national estate
- ii. Provincial Grade II significance: should be managed as part of the provincial estate
- iii. Local Grade IIIA: should be included in the heritage register and not be mitigated (high significance)
- iv. Local Grade IIIB: should be included in the heritage register and may be mitigated (high/medium significance)
- v. General protection A (IV A): site should be mitigated before destruction (high/medium significance)
- vi. General protection B (IV B): site should be recorded before destruction (medium significance)
- vii. General protection C (IV C): phase 1 is seen as sufficient recording and it may be demolished (low significance)

APPENDIX D: PROTECTION OF HERITAGE RESOURCES:

Formal protection:

National heritage sites and Provincial heritage sites – Grade I and II

Protected areas - An area surrounding a heritage site

Provisional protection – For a maximum period of two years

Heritage registers – Listing Grades II and III

Heritage areas – Areas with more than one heritage site included

Heritage objects – e.g. Archaeological, palaeontological, meteorites, geological specimens, visual art, military, numismatic, books, etc.

General protection:

Objects protected by the laws of foreign states

Structures – Older than 60 years

Archaeology, palaeontology and meteorites

Burial grounds and graves

Public monuments and memorials

APPENDIX E: HERITAGE IMPACT ASSESSMENT PHASES

1. Pre-assessment or Scoping Phase – Establishment of the scope of the project and terms of reference.
2. Baseline Assessment – Establishment of a broad framework of the potential heritage of an area.
3. Phase I Impact Assessment – Identifying sites, assess their significance, make comments on the impact of the development and makes recommendations for mitigation or conservation.
4. Letter of recommendation for exemption – If there is no likelihood that any sites will be impacted.
5. Phase II Mitigation or Rescue – Planning for the protection of significant sites or sampling through excavation or collection (after receiving a permit) of sites that may be lost.
6. Phase III Management Plan – For rare cases where sites are so important that development cannot be allowed.