HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999)

FOR THE PROPOSED PLATLAND – CEMETERY, GA-KGAPANE, LIMPOPO PROVINCE

Type of development:

Platland – Cemetery

Client:

Tekplan Environmental Consultants

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Project Reference:
HCAC Project number 2181102
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November 2018

APPROVAL PAGE

Project Name	**Platland Cemetery**
Report Title	Heritage Impact Assessment Platland Cemetery
Authority Reference Number	TBC
Report Status	Final Report
Applicant Name	Greater Letaba Local Municipality

	Name	Signature	Qualifications and Certifications	Date
Document Compilation	Jaco van der Walt		MA Archaeology ASAPA #159 APHP #114	November 2018

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Amendments on Document

Date	Report Reference Number	Description of Amendment

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REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

Table 1. Specialist Report Requirements.

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of - (i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae	Section a Section 12
(b) Declaration that the specialist is independent in a form as may be specified by the competent authority	*Declaration of Independence*
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA)an indication of the quality and age of base data used for the specialist report	Section 3.4 and 7.1.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	9
(d) Duration, Date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3.4
(e) Description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3
(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 8 and 9
(g) Identification of any areas to be avoided, including buffers	Section 9
(h) 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 8
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(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** or activities;	Section 9
(k) Mitigation measures for inclusion in the EMPr	Section 9 and 10
(l) Conditions for inclusion in the environmental authorisation	Section 9 and 10
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 9 and 10
(n) Reasoned opinion - (i) as to whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and (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 10.2
(o) Description of any consultation process that was undertaken during the course of preparing the specialist report	Section 6
(p) A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Refer to EIA report
(q) Any other information requested by the competent authority	Section 10

Executive Summary

Tekplan Environmental Consultants were appointed by the Greater Letaba Local Municipality to conduct an Environmental Impact Assessment for a proposed cemetery with associated uses on Portion 5 of the farm Platland 401 LT approximately 2km north-west of Ga-Kgapane in the Greater Letaba Local Municipal area. HCAC was appointed to conduct a Heritage Impact Assessment of the proposed project to determine the presence of cultural heritage sites and the impact of the proposed development on these non-renewable resources. The study area was assessed both on desktop level and by a field survey. The field survey was conducted as a non-intrusive pedestrian survey to cover the extent of the development footprint.

No significant archaeological sites or material was recorded during the survey and based on the SAHRIS Paleontological Sensitivity Map the area is of insignificant paleontological significance. No further mitigation prior to construction is recommended in terms of Section 35 for the proposed development to proceed. In terms of the built environment of the area (Section 34), no standing structures older than 60 years occur within the study area. In terms of Section 36 of the Act no burial sites were recorded. However, if any graves are located in future they should ideally be preserved *in-situ*. No public monuments are located within or close to the study area. The study area is rural in character surrounded by residential and road infrastructure developments and the proposed cemetery will not impact negatively on significant cultural landscapes or viewscapes. During the public participation process conducted for the project no heritage concerns was raised.

Due to the lack of significant heritage resources in the study area the impact of the proposed project on heritage resources is considered low and it is recommended that the proposed project can commence on the condition that the following recommendations are implemented as part of the EMPr and based on approval from SAHRA:

- Implementation of a chance find procedure.

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Declaration of Independence

Specialist Name	Jaco van der Walt
Declaration of Independence	I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 108 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations, that I: • I act as the independent specialist in this application; • I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant; • I declare that there are no circumstances that may compromise my objectivity in performing such work; • I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity; • I will comply with the Act, Regulations and all other applicable legislation; • I have no, and will not engage in, conflicting interests in the undertaking of the activity; • I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority; • All the particulars furnished by me in this form are true and correct; and • I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.
Signature	
Date	24/11/2018

a) Expertise of the specialist

Jaco van der Walt has been practising as a CRM archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of ASAPA (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, KZN as well as he Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, DRC Zambia and Tanzania. Through this he has a sound understanding of the IFC Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage.

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ABBREVIATIONS

AIA: Archaeological Impact Assessment
ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
BIA: Basic Impact Assessment
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DEA: Department of Environmental Affairs
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMP: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)
Early Stone Age (~ 2.6 million to 250 000 years ago)
Middle Stone Age (~ 250 000 to 40-25 000 years ago)
Later Stone Age (~ 40-25 000, to recently, 100 years ago)
The Iron Age (~ AD 400 to 1840)
Historic (~ AD 1840 to 1950)
Historic building (over 60 years old)

1 Introduction and Terms of Reference:

Heritage Contracts and Archaeological Consulting CC (**HCAC)** has been contracted by Tekplan Environmental Consultants to conduct a heritage impact assessment for the proposed Platland cemetery development. The report forms part of the Environmental Impact Assessment and Environmental Management Programme Report (EMPr) for the proposed Cemetery. The site is located on Portion 5 of the farm Platland 401 LT approximately 2km north-west of Ga-Kgapane in the Greater Letaba Local Municipal area (Figure 1 -3).

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes: Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, 3 Iron Age/historical find spots were identified. General site conditions and features on sites were recorded by means of photographs, GPS locations, and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report. SAHRA as a commenting authority under section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) require all environmental documents, complied in support of an Environmental Authorisation application as defined by NEMA EIA Regs section 40 (1) and (2), to be submitted to SAHRA. As such the Basic Assessment report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

1.1 Terms of Reference

Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed towers.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).

Table 2: Project Description

Size of farm and portions	35 hectares on Portion 5 of the farm Platland 401 LT approximately 2km north-west of Ga-Kgapane in the Greater Letaba Local Municipal area.
Magisterial District	Greater Letaba Municipality falling within Mopani District Municipality in Limpopo Province.
1: 50 000 map sheet number	2330CA
Central co-ordinate of the development	23°37'29.94"S 30°12'14.54"E

Table 3: Infrastructure and project activities

Type of development	The project entails the development of a cemetery
Project size	Approximately 35 ha
Project Components	Cemetery with associated uses

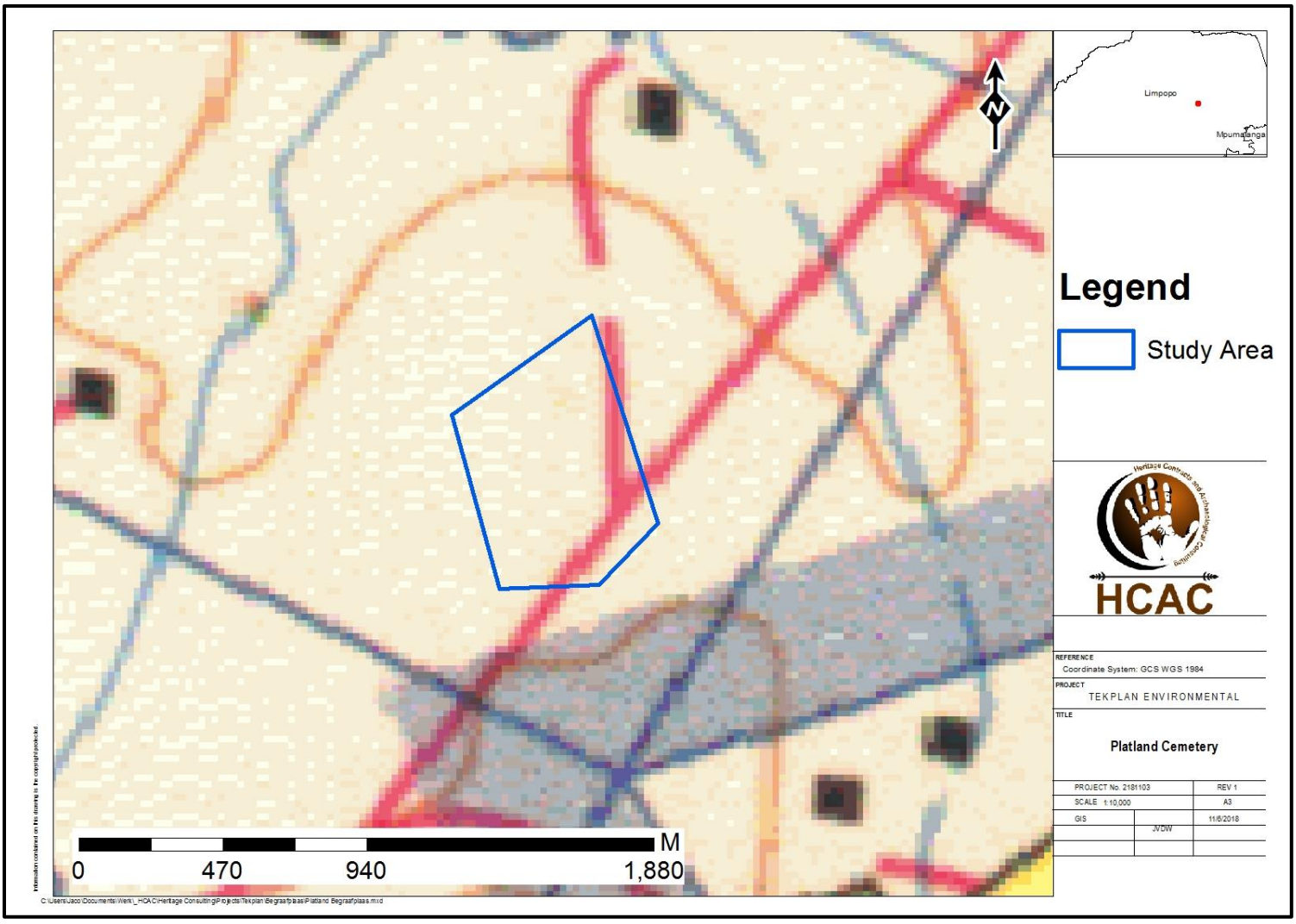


Figure 1. Provincial locality map (1: 250 000 topographical map)

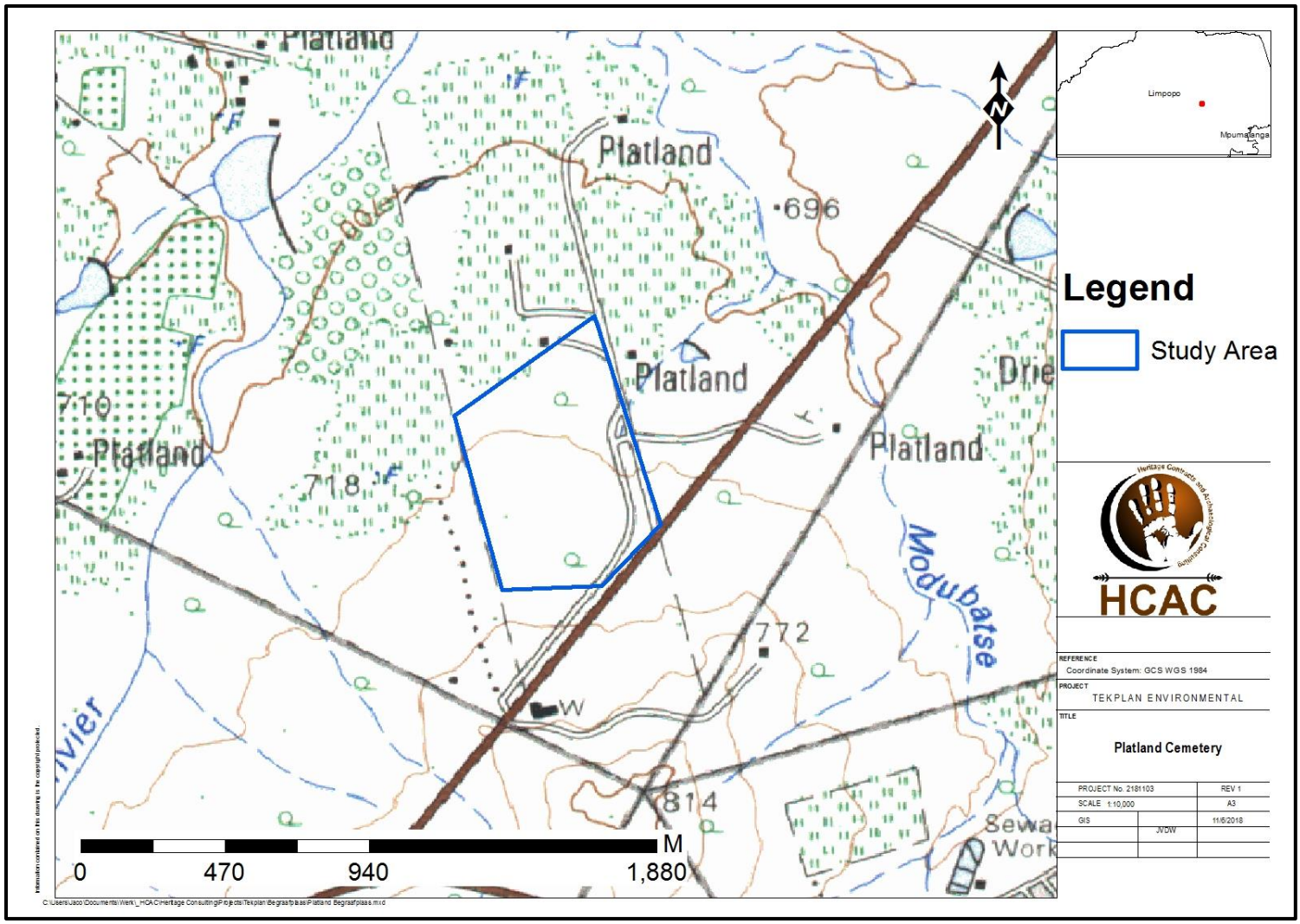


Figure 2: Regional locality map (1:50 000 topographical map).

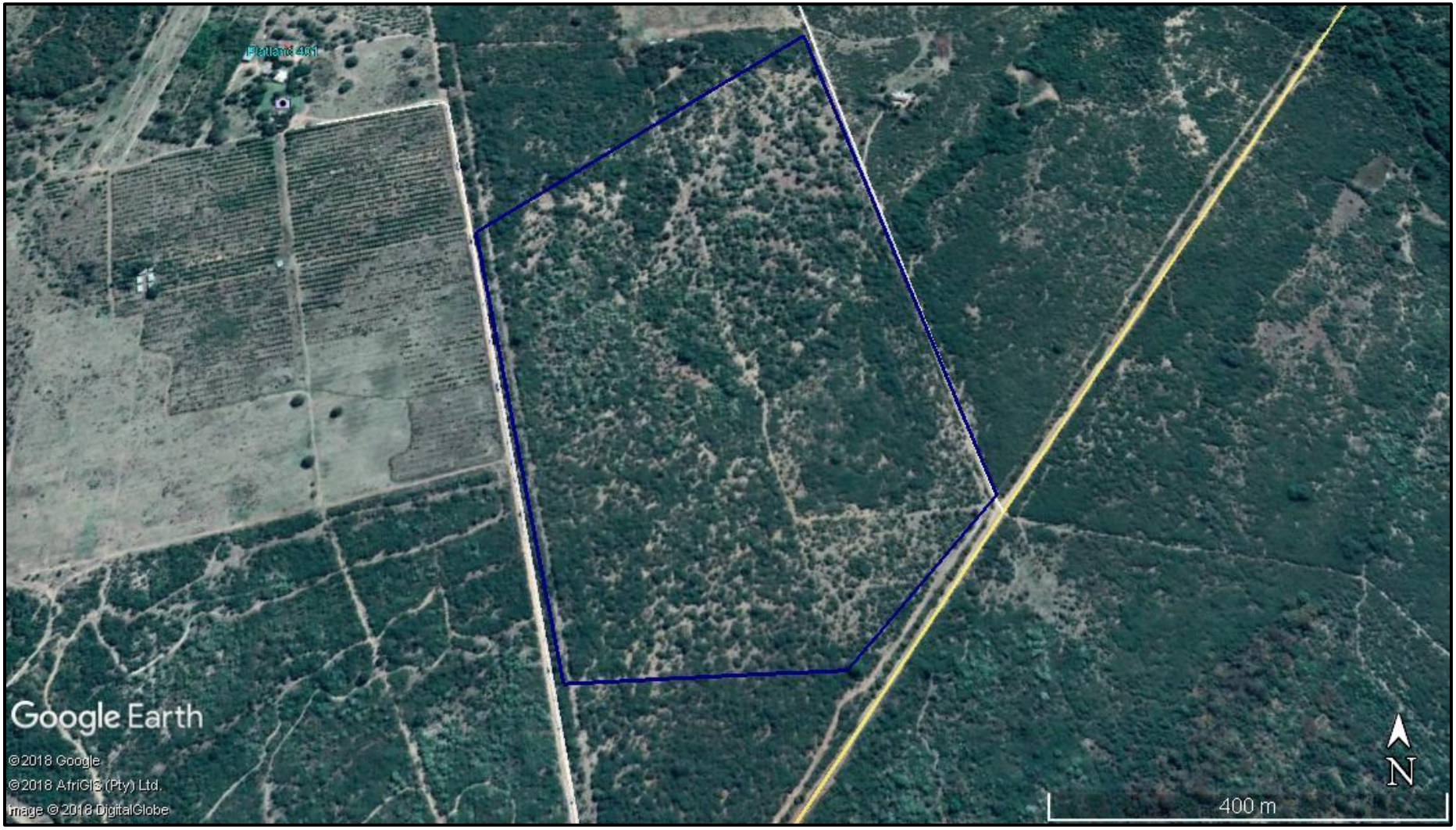


Figure 3. Satellite image indicating the study area in blue (Google Earth 2016).

2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 - Section 23(2)(b)
- Mineral and Petroleum Resources Development Act (MPRDA), Act No. 28 of 2002 - Section 39(3)(b)(iii)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the professional evaluation of Phase 1 reports upon which review comments will be issued. 'Best practice' requires Phase 1 reports and additional development information, as per the impact assessment report and/or EMPr, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 AIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 AIA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance No. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

3 METHODOLOGY

3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the field work phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any BAR process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings. The process involved:

- Placement of advertisements and site notices
- Stakeholder notification (through the dissemination of information and meeting invitations);
- Stakeholder meetings undertaken with I&APs;
- Authority Consultation
- The compilation of a Basic Assessment Report (BAR).
- The compilation of a Comments and Response Report (CRR).

3.4 Site Investigation

Conduct a field study to: a) systematically survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Table 4: Site Investigation Details

	Site Investigation
Date	4 September 2018
Season	Early Summer –vegetation in the study area is low and archaeological visibility is high. The impact area was sufficiently covered (Figure 4) to adequately record the presence of heritage resources.

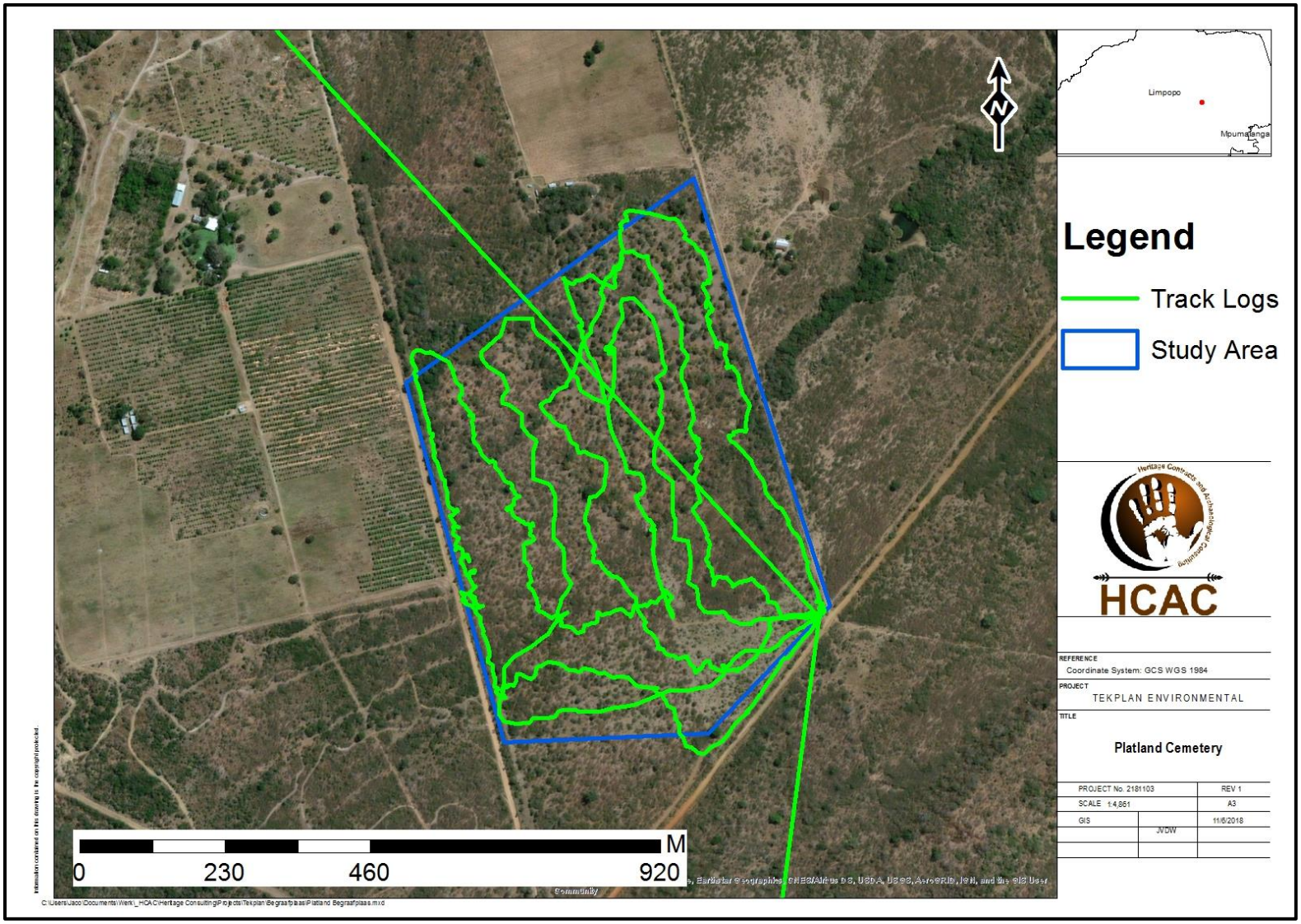


Figure 4: Track logs of the survey in green.

3.5 Site Significance and Field Rating

Section 3 of the NHRA distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface. This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.

FIELD RATING	***GRADE***	***SIGNIFICANCE***	***RECOMMENDED MITIGATION***
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP.A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP.B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

3.6 Impact Assessment Methodology

The criteria below are used to establish the impact rating on sites:

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- The **duration**, wherein it will be indicated whether:
  - the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
  - the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
  - medium-term (5-15 years), assigned a score of 3;
  - long term (> 15 years), assigned a score of 4; or
  - permanent, assigned a score of 5;
  - The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
  - The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
  - The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
  - the **status**, which will be described as either positive, negative or neutral.
  - the degree to which the impact can be reversed.
  - the degree to which the impact may cause irreplaceable loss of resources.
  - the *degree* to which the impact can be mitigated.

The **significance** is calculated by combining the criteria in the following formula:

S=(E+D+M)P

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the subsurface nature of archaeological artefacts, the possibility exists that some features or artefacts may not have been discovered/recorded during the survey and the possible occurrence of unmarked graves and other cultural material cannot be excluded. Similarly, the depth of the deposit of heritage sites cannot be accurately determined due its subsurface nature. This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would have been highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

4 Description of Socio Economic Environmental

According to the GLM IDP 2013 the population of the Greater Letaba Municipality area is estimated at 21 2701. This calculates to 131 people per km². Approximately 5 8261 households live in Greater Letaba with an average household size of 4.2 which is smaller than the district average of 4.4. The population is very young with 36.8% of the people younger than 35 years. The youth are most severely affected by the priority issues (water, electricity, school, health facilities, etc.). The high unemployment rate and general lack of jobs will affect this segment of the population once they enter the employment market as job seekers.

The percentage of households headed by females is 56.8%. This has been attributed by the migration of males to other part of the country in search for employment. This percentage is higher than that of the district of 49.7%. The majority of the households with no income are headed by women. These households are therefore more reliant on social grants and are more dependent on the delivery of free basic services. However, it has been established that a reasonable number of households are headed by Children. These households are evidently worse than female headed households in terms of poverty and illiteracy levels.

Approximately 14.4% of Greater Letaba Municipality households have no income. The 14.4% of households in Greater Letaba with no income is high as compare to the District Municipality s 14.2%. The report also indicates that 50 % of the household in Greater Letaba Municipality earn less than R1600 per month. Whereas 34, 9 % earn more than R1600, therefore the percentage of the household who have no income and the percentage of household who earn less than R1600 per month is 64,4%.

5 Description of the Physical Environment:

The study area measures approximately 35 ha in size and is situated approximately 3 km to the north west of Ga Kgapane. The site is undeveloped and has been fallow for a number of years. The site is bordered by gravel roads to the south and west that also provides direct access to the site. The study area is characterized by dense tree cover with no major topographical features like rocky outcrops or pans (Figure 4 & 5). The vegetation is described by Mucina and Rutherford (2006) as North-Eastern Mountain Sourveld.

Figure 5. General site conditions

Figure 6. General site conditions

6 Results of Public Consultation and Stakeholder Engagement:

Adjacent landowners and the public at large were informed of the proposed activity as part of the BA process. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process.

7 Literature / Background Study:

7.1 Literature Review (SAHRIS)

The following CRM reports were conducted in the greater area and were consulted for this report:

Author	Year	Project	Findings
Stegman, L & Roodt, F.	2013	Phase 1 Heritage Resource Impact Assessment (Scoping & Evaluation) Proposed Town Extension 17 Modjadjieskloof, Limpopo Statement with Regard to Heritage Resources Management	No Sites
Roodt, F.	2007	Heritage Impact Assessment Report Skoongelegen Residential Development Tzaneen: Ga-Kgapane Limpopo	Iron Age Sites
Kusel, U.	2003	Cultural Heritage Resources Scoping Report Mogoboya Long Valley (150 Residential Sites)	Grave Site
Van Schalkwyk, J.	2001	Heritage Impact Assessment Report Fry Dam Matomashoek 371 LT and Gemsbokspruit 372 LT, Northern Province	Iron Age and Stone Age artefacts

7.1.1 Genealogical Society and Google Earth Monuments

No known grave sites are on record close to the study area.

7.2 General History of the area

7.2.1 Archaeology of the area

South Africa has a long and complex Stone Age sequence of more than 2 million years. The broad sequence includes the Later Stone Age, the Middle Stone Age and the Earlier Stone Age. Each of these phases contains sub-phases or industrial complexes, and within these we can expect regional variation regarding characteristics and time ranges. For Cultural Resources Management (CRM) purposes it is often only expected/ possible to identify the presence of the three main phases.
Yet sometimes the recognition of cultural groups, affinities or trends in technology and/or subsistence practices, as represented by the sub-phases or industrial complexes, is achievable (Lombard 2011). The three main phases can be divided as follows;

- Later Stone Age; associated with Khoi and San societies and their immediate predecessors. Recently to ~30 thousand years ago
- Middle Stone Age; associated with Homo sapiens and archaic modern humans. 30-300 thousand years ago.
- Earlier Stone Age; associated with early Homo groups such as Homo habilis and Homo erectus. 400 000-> 2 million years ago.

7.2.1.1 Early Stone Age

Hominids began to make stone tools about 2.6 million years ago. Known as the Oldowan industry, most of the earliest tools were rough cobble cores and simple flakes. The flakes were used for such activities as skinning and cutting meat from scavenged animals. These early artefacts are difficult to recognize and have so far mostly been found in rock shelters such as the Sterkfontein Caves (Kuman, 1998); they are unlikely to occur in the study area.

At about 1.4 million years ago hominids started producing more recognizable stone artefacts such as hand axes, cleavers and core tools (Deacon & Deacon, 1999). Among other things these Acheulian tools were probably used to butcher large animals such as elephants, rhinoceros and hippopotamus that had died from natural causes. Acheulian artefacts are usually found near the raw material from where they were quarried, at butchering sites, or as isolated finds.

No Acheulian sites are on record near the project area, but isolated finds are possible. However, isolated finds have little value. Therefore, the project is unlikely to disturb a significant site.

7.2.1.2 Middle Stone Age

By the beginning of the Middle Stone Age (MSA), tool kits included prepared cores, parallel-sided blades and triangular points hafted to make spears (Volman, 1984). MSA people had become accomplished hunters by this time, especially of large grazing animals such as wildebeest, hartebeest and eland.

These hunters are classified as early humans, but by approximately 100,000 years ago, they were anatomically fully modern. The oldest evidence for this change has been found in South Africa, and it is an important point in debates about the origins of modern humanity. In particular, the degree to which behaviour was fully modern is still a matter of debate. The repeated use of caves indicates that MSA people had developed the concept of a home base and that they could make fire. These were two important steps in cultural evolution (Deacon & Deacon, 1999). MSA artefacts have been found in the Oliboompoort Cave to the south of Lephalale (Mason, 1962; M. van der Ryst, 2006) and in the river gravels of the Limpopo (Pistorius, 2007). Middle Stone Age sites are also associated with pans and ancient drainage systems.

7.2.1.3 Later Stone Age

By the beginning of the Later Stone Age (LSA), human behaviour was undoubtedly modern. Uniquely human traits, such as rock art and purposeful burials with ornaments, became a regular practice. These people were the ancestors of the San (or Bushmen).

San rock art has a well-earned reputation for aesthetic appeal and symbolic complexity (Lewis-Williams, 1981). In addition to art, LSA sites contain diagnostic artefacts, including microlithic scrapers and segments made from very fine-grained rock (Wadley, 1987). Spear hunting probably continued, but LSA people also hunted small game with bows and poisoned arrows. Important LSA deposits have been excavated in Oliboompoort Cave (Mason, 1962) and other sites in the Waterberg to the south (Van der Ryst, 1998). Sites in the open are usually poorly preserved and therefore perceived to have less value than sites in caves or rock shelters.

7.2.1.4 The Iron Age (AD 400 to 1840)

Bantu-speaking people moved into Eastern and Southern Africa about 2,000 years ago (Mitchell, 2002). These people cultivated sorghum and millets, herded cattle and small stock and manufactured iron tools and copper ornaments. Because metalworking represents a new technology, archaeologists call this period the Iron Age. Characteristic ceramic styles help archaeologists to separate the sites into different groups and time periods. The first 1,000 years is called the Early Iron Age.

As mixed farmers, Iron Age people usually lived in semi-permanent settlements consisting of pole-and-daga (mud mixed with dung) houses and grain bins arranged around a central area for cattle (Huffman, 1982). Usually, these settlements with the 'Central Cattle Pattern' (CCP) were sited near water and good soils that could be cultivated with an iron hoe. For the project area, archaeological sites such as these are unlikely to occur except along river terraces.

According to the most recent archaeological cultural distribution sequences by Huffman (2007), this area falls within the distribution area of various cultural groupings originating out of both the Urewe Tradition (eastern stream of migration) and the Kalundu Tradition (western stream of migration).

The facies that may be present are:

- Urewe Tradition: Kwale branch- Silver Leaves *facies* AD 280-450 (Early Iron Age)
- *Mzonjani facies* AD 450 – 750 (Early Iron Age)
- Moloko branch- *Icon facies* AD 1300 - 1500 (Late Iron Age)
- Kalundu Tradition: Happy Rest sub-branch - *Doornkop facies* AD 750 - 1000 (Early Iron Age)
- *Letaba facies* AD 1600 - 1840 (Late Iron Age)

7.3 Historical Background

Historically the Lobedu of Modjadji inhabit the greater study area (Krige 1938). Since the 1600s the Balobedu have been settled around the escarpment to the south west of the study area and whose Rain Queen is historically famous and revered by neighbouring people including the Shangaan/Tsonga and the Venda (Krige & Krige 1943). The Balobedu have had female rulers for the past six generations all bearing the title Modjadji. The Modjadji Rain queen also protects the adjacent population of Modjadji Cycads (*Encephalartos transvenosus*), growing in a Provincial Heritage Site in the area.

Historical highlights in the area include the 1895 war between Chief Makgoba and the ZAR, the establishment of the famous postal coach service from Pietersburg via Haenertsburg to Leydsdorp by Doel Zeederberg in 1899 and the passage of the Anglo-Boer War including a clash between the Bushveldt Carbineers (BVC) and the Letaba Commando at W.H. Viljoen's farm Duiwelskloof in August 1901 (Woolmoore 2002). Two of the BVC and three of the Boer commando were killed in this action. Further away and to the south west the destruction of the last Long Tom guns took place near Haenertsburg in April 1901 (Changuion 2008).

7.4 Cultural Landscape

The site under investigation is located in Modjadjiskloof, about 23 kilometres to the north of Tzaneen in Limpopo Province.

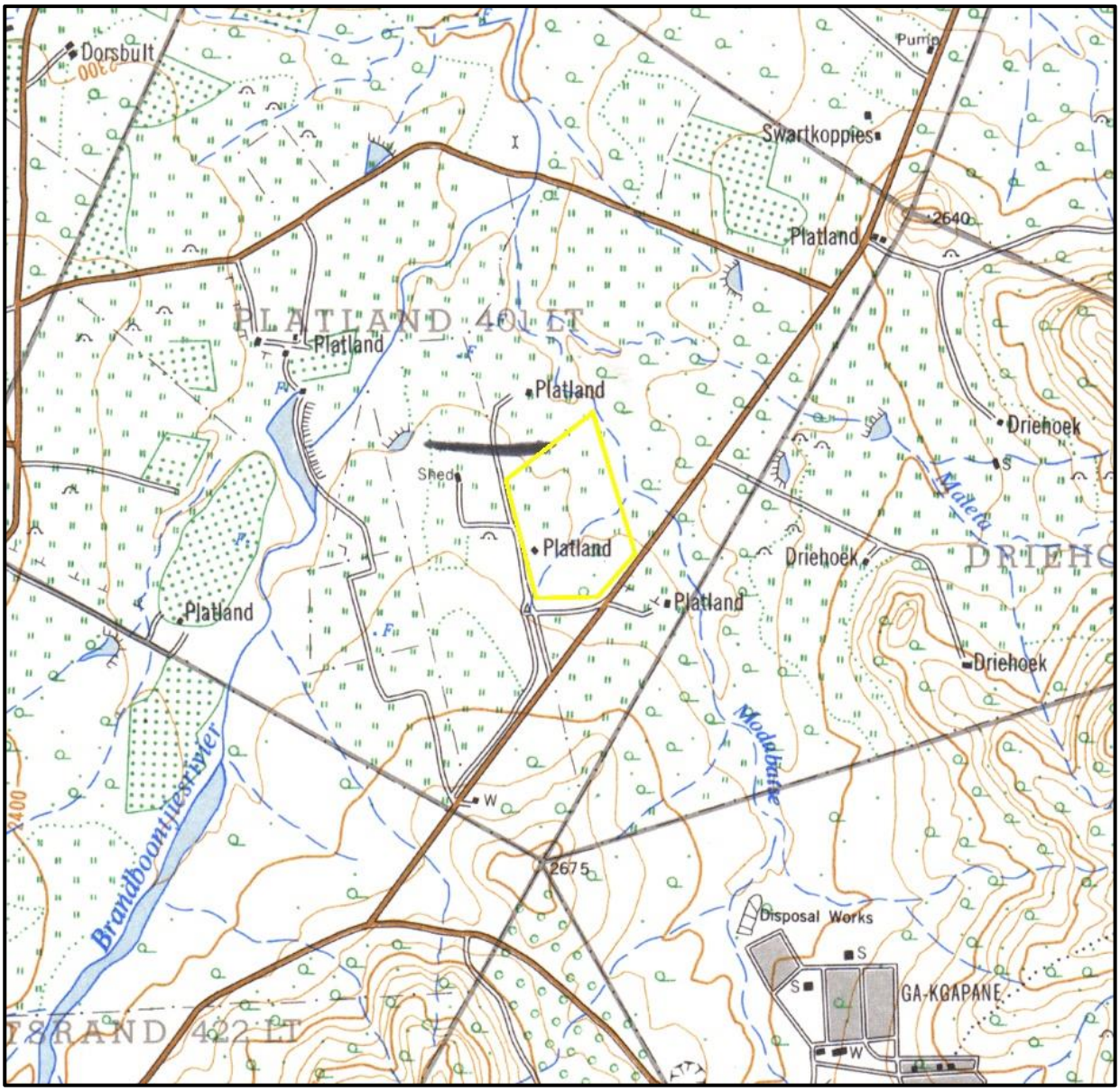


Figure 7. 1966 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. A river went through the study area, minor roads are visible to the west and south of the site and a secondary road can be seen to the south east. The largest part of the site under investigation was used as cultivated lands, and one building is visible. (Topographical Map 1966)

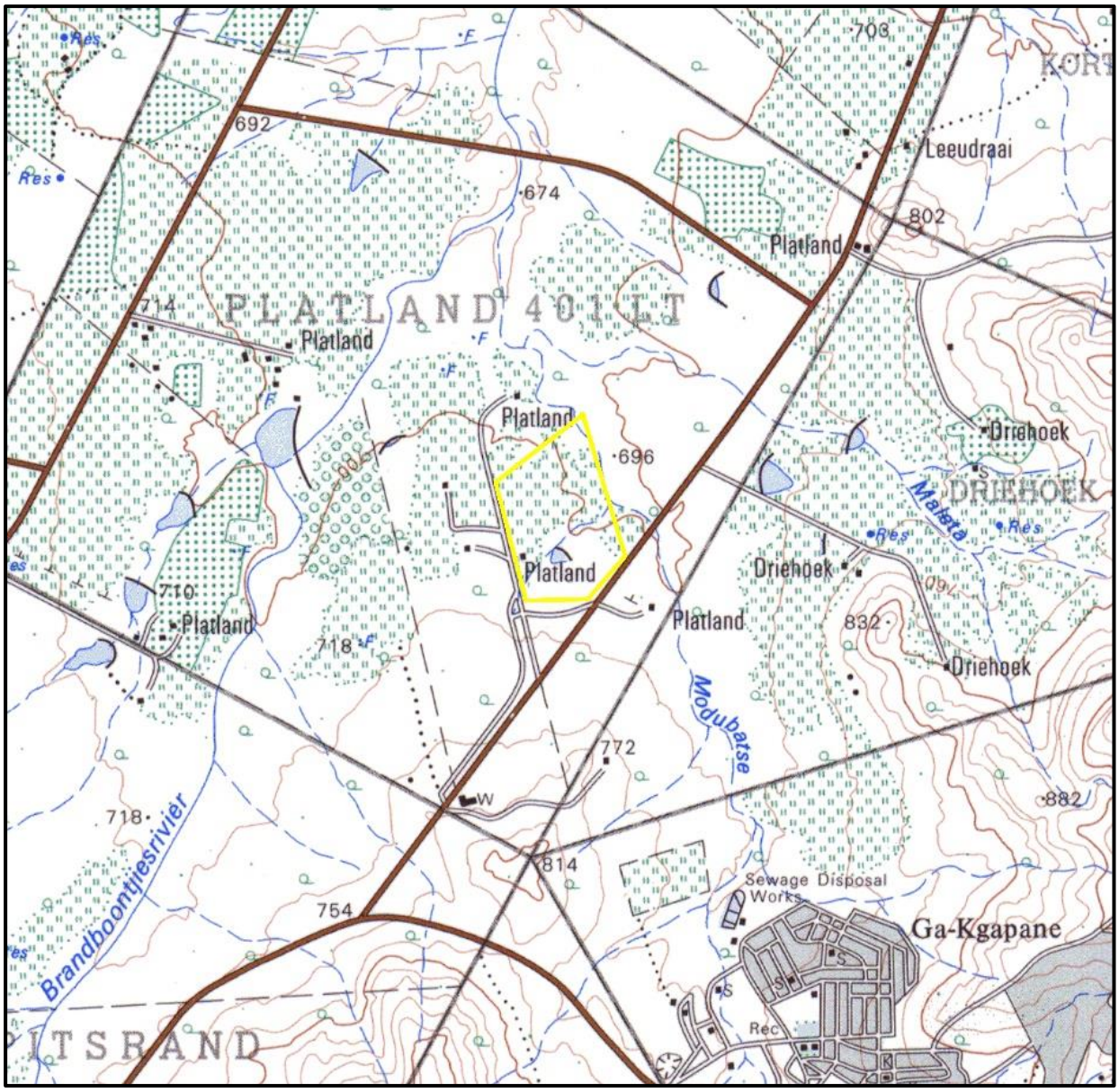


Figure 8. 1983 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. A river went through the study area, minor roads are visible to the west and south of the site and a secondary road can be seen to the south east. The largest part of the site under investigation was used as cultivated lands, and one building and a small dam are visible. (Topographical Map 1983)

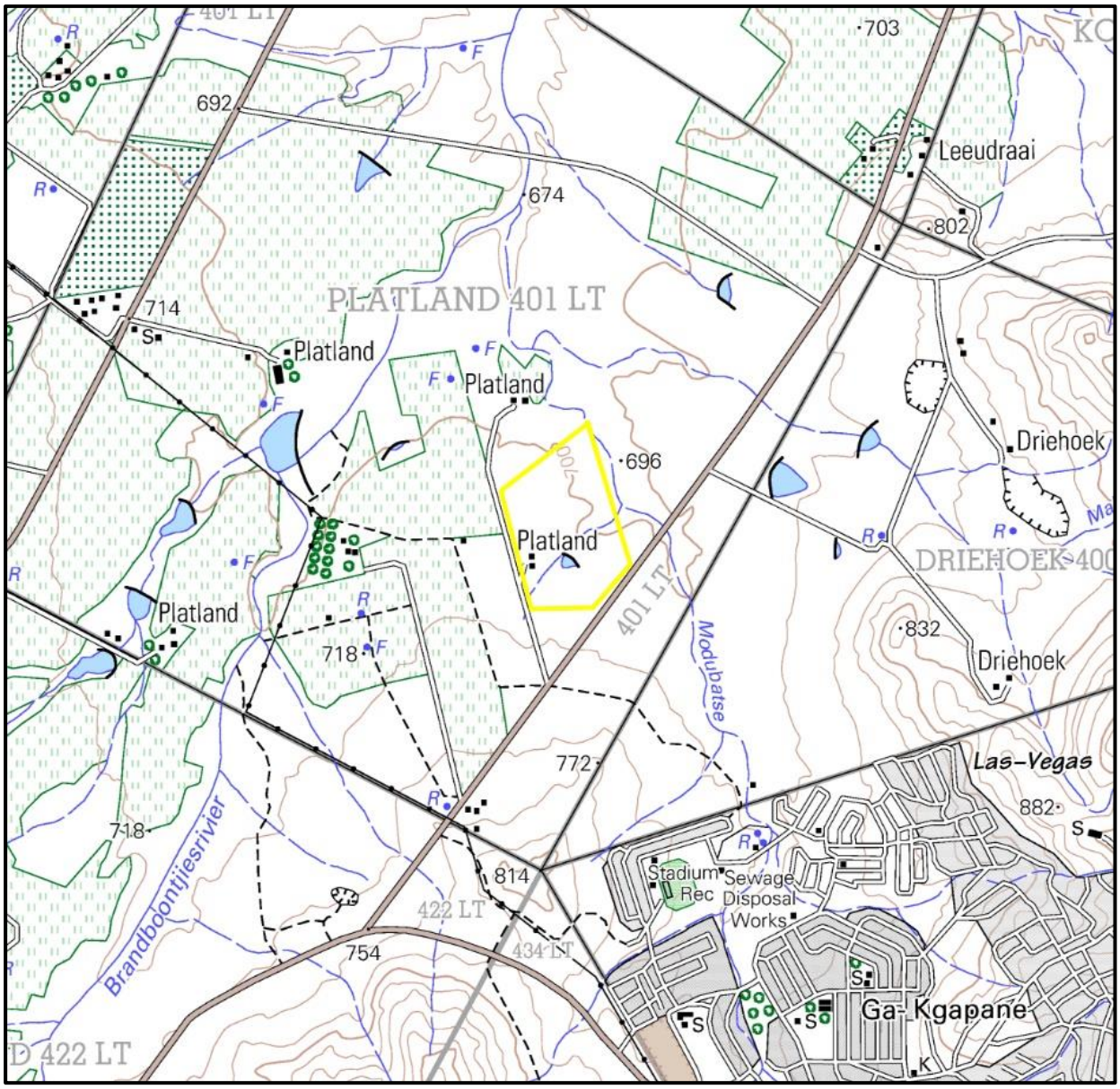


Figure 9. 2002 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. A river went through the study area, a minor road is visible to the west of the site and a secondary road can be seen to the south east. Two buildings and a small dam are visible. (Topographical 2002)

Figure 10. 2018 Google Earth image showing the study area in relation to the R526, Modjadjiskloof, Tzaneen and other sites. (Google Earth 2018)

8 Findings of the Survey

The study area measures approximately 35 ha in size and was surveyed over a period of one day. Portions of the study area are disturbed by construction activities relating to power line infrastructure and access roads. Furthermore the site was cultivated in the 1980's (Figure 8) and all of these activities would have impacted on surface indicators of heritage sites. Undecorated ceramics were recorded and is further discussed under Section 8.2 of this report.

In terms of the national estate as defined by the NHRA no sites of significance were found during the survey as described below.

8.1 Built Environment (Section 34 of the NHRA)

No standing structures older that 60 years occur in the study area.

8.2 Archaeological and palaeontological resources (Section 35 of the NHRA)

During the survey three areas (Figure 15 & Table 5) were recorded where undecorated pot sherds (Figure 11 & 12) were found in relation to large ants' nests (Figure 13 & 14). This is a common feature in Limpopo where ceramic containers were used to harvest ants as a source of protein by attracting and trapping the ants with water in clay pots. These find spots consisting of isolated undiagnostic ceramics do not constitute an archaeological site and are of no significance apart from noting their presence in this report.

Figure 11. Undiagnostic potsherds

Figure 12. Artefacts found at find spot.

Figure 13: Ants nets at Site FS 2

Figure 14: Ants nest at Site FS 3

Table 5: The find spots were located at:

LABEL	LONGITUDE	LATITUDE	ELEVATION
FS 1	30° 12' 07.4269" E	23° 37' 37.9596" S	734,1261
FS 2	30° 12' 15.3755" E	23° 37' 29.7481" S	731,3749
FS 3	30° 12' 11.5487" E	23° 37' 19.4159" S	724,5292

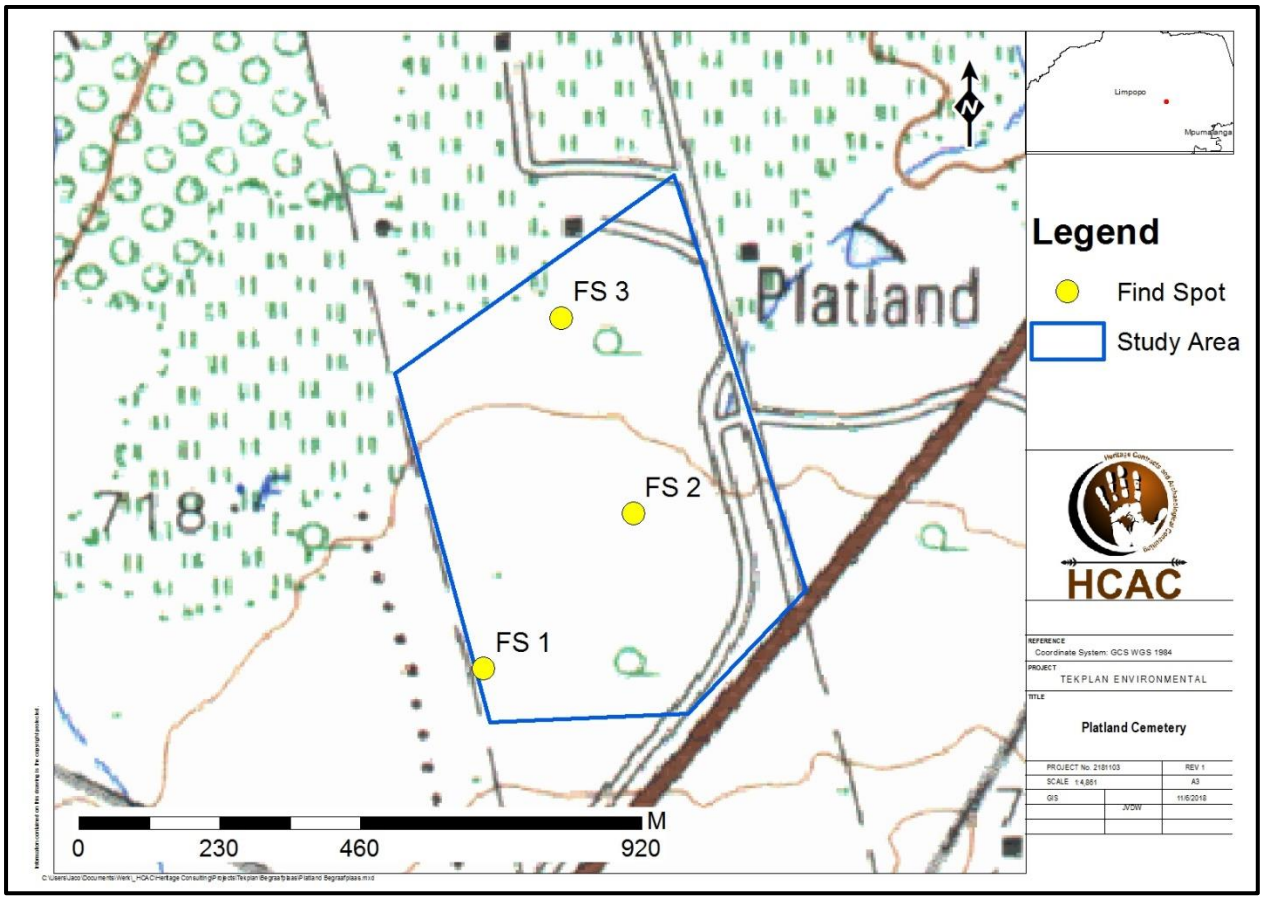
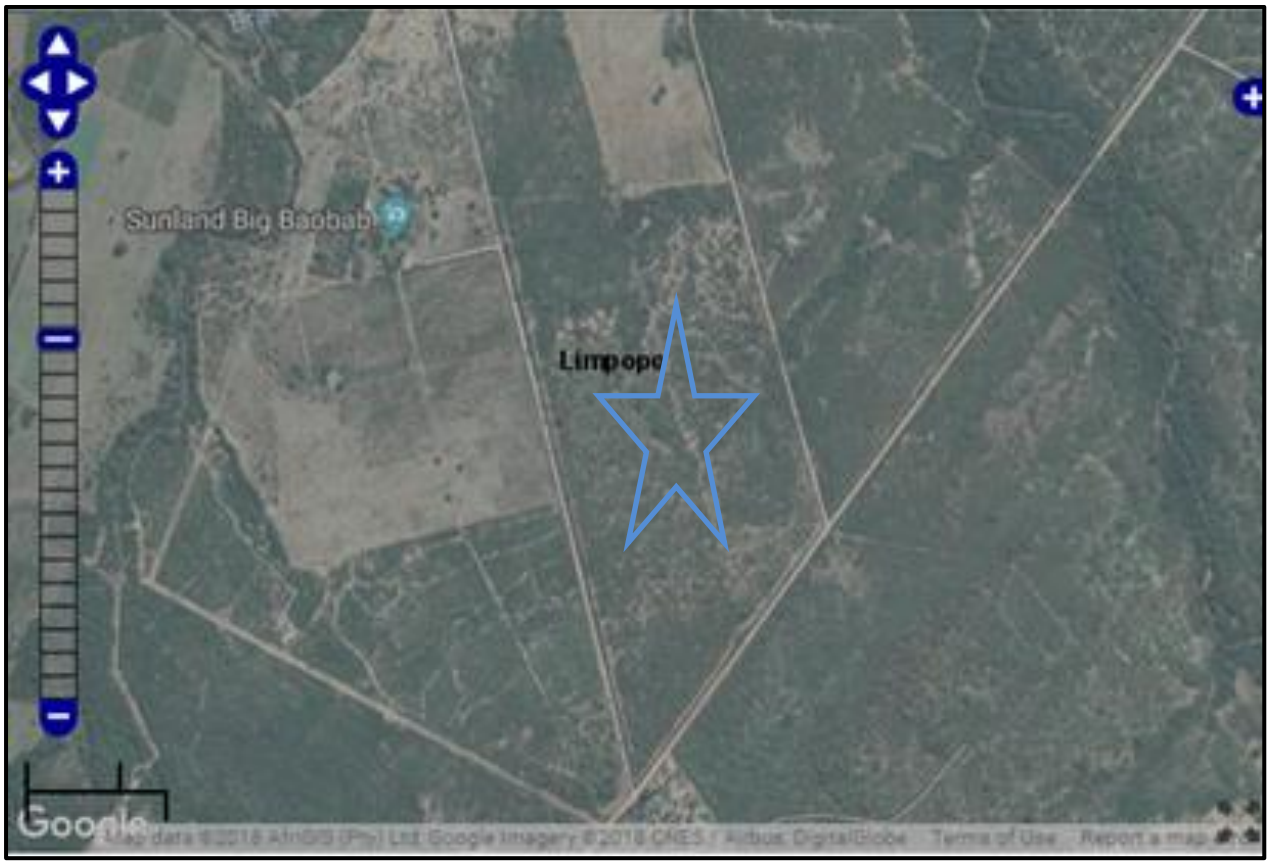


Figure 15. Location of find spots

Based on the SAHRIS Paleontological Sensitivity Map the area is of insignificant paleontological significance (Figure 16). Therefore, no further mitigation prior to construction is recommended in terms of Section 35 for the proposed development to proceed



Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	Desktop study is required
BLUE	LOW	No palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map

Figure 16. SAHRA Paleontological map with the study area indicated in blue, the area is of insignificant paleontological sensitivity.

8.3 Burial Grounds and Graves (Section 36 of the NHRA)

In terms of Section 36 of the Act no burial sites were recorded. However, if any graves are located in future they should ideally be preserved *in-situ* or alternatively relocated according to existing legislation.

8.4 Cultural Landscapes, Intangible and Living Heritage.

Long term impact on the cultural landscape is considered to be low as the surrounding area has been developed from prior to 1966 onwards. Visual impacts to scenic routes and sense of place are also considered to be low.

8.5 Battlefields and Concentration Camps

There are no battlefields or related concentration camp sites located in the study area.

8.6 Potential Impact

8.6.1 Pre-Construction phase:

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of road infrastructure needed for the construction phase. These activities can have a negative and irreversible impact on heritage sites. Impacts include destruction or partial destruction of non-renewable heritage resources.

8.6.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. These activities can have a negative and irreversible impact on heritage sites. Impacts include destruction or partial destruction of non-renewable heritage resources.

8.6.3 Operation Phase:

No impact is envisaged for the recorded heritage resources during this phase.

Cumulative impacts occur from the combination of effects of various impacts on heritage resources. The importance of identifying and assessing cumulative impacts is that the whole is greater than the sum of its parts. In the case of the development, it will, with the recommended mitigation measures and management actions, not impact any heritage resources directly. However this and other projects in the area could have an indirect impact on the heritage landscape. The lack of any heritage resources in the immediate area minimises additional impact on the landscape.

Table 6. Impact Assessment table.

Nature: During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological material or objects.		
	Without mitigation	**With mitigation (Preservation/ excavation of site)**
Extent	Local (1)	Local (1)
Duration	Permanent (5)	Permanent (5)
Magnitude	Low (2)	Low (2)
Probability	Not probable (2)	Not probable (2)
Significance	**16 (Low)**	**16 (Low)**
Status (positive or negative)	Negative	Negative
Reversibility	Not reversible	Not reversible
Irreplaceable loss of resources?	No resources were recorded	No resources were recorded.
Can impacts be mitigated?	Yes, a chance find procedure should be implemented.	Yes
Mitigation: Due to the lack of apparent significant heritage resources no further mitigation is required prior to construction. A Chance Find Procedure should be implemented for the project should any sites be identified during the construction process.		

9 Recommendations and conclusion

HCAC was appointed to conduct a Heritage Impact Assessment for the proposed Platland Cemetery, located approximately 2km north-west of Ga-Kgapane in the Greater Letaba Local Municipal area. The study area measures 35 hectares, is undeveloped and has been fallow for a number of years although the site was cultivated in the 1980's (Figure 8). Cultivation of the site would have impacted on surface indicators of heritage sites and in terms of the national estate as defined by the NHRA no sites of significance were found during the survey as described below.

In terms of the built environment of the area (Section 34 of the NHRA Act 25 of 1999), no standing structures older than 60 years occur within the impact area. Regarding the archaeological component of Section 35 three find spots were recorded where undecorated pot sherds were found in relation to large ants nests. This is a common feature in Limpopo where ceramic containers were used to harvest ants as a source of protein by attracting and trapping the ants to water in clay pots. These find spots consisting of isolated undiagnostic ceramics do not constitute an archaeological site and are of no significance apart from noting their presence in this report.

According to the SAHRA palaeontological sensitivity map the area is of insignificant paleontological sensitivity. Therefore, no further mitigation prior to construction is recommended in terms of Section 35 for the proposed development to proceed.

In terms of Section 36 of the Act no burial sites were recorded. No public monuments are located within or close to the study area. The proposed development will not impact negatively on significant cultural landscapes or viewscapes. During the public participation process conducted for the project no heritage concerns was raised.

Due to the lack of significant heritage resources in the study area the impact of the proposed project on heritage resources is considered low and it is recommended that the proposed project can commence on the condition that the following chance find procedure are implemented as part of the EMPr and based on approval from SAHRA

9.1 Chance Find Procedures

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be contacted for an assessment of the find and therefor chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

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11 Appendices:

Curriculum Vitae of Specialist

Jaco van der Walt
Archaeologist

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Education:

Particulars of degrees/diplomas and/or other qualifications:

Name of University or Institution:		University of Pretoria
Degree obtained	**:**	BA Heritage Tourism & Archaeology
Year of graduation	**:**	2001
Name of University or Institution:		University of the Witwatersrand
Degree obtained	**:**	BA Hons Archaeology
Year of graduation	**:**	2002
Name of University or Institution	**:**	University of the Witwatersrand
Degree Obtained	**:**	MA (Archaeology)
Year of Graduation	:	2012
Name of University or Institution	**:**	University of Johannesburg
Degree	**:**	PhD
Year	:	Currently Enrolled

EMPLOYMENT HISTORY:

2011 – Present:	**Owner – HCAC (Heritage Contracts and Archaeological Consulting CC)**.
2007 – 2010 :	**CRM Archaeologist,** Managed the Heritage Contracts Unit at the University of the Witwatersrand.
2005 - 2007:	**CRM Archaeologist**, Director of Matakoma Heritage Consultants
2004:	**Technical Assistant**, Department of Anatomy University of Pretoria
2003:	**Archaeologist**, Mapungubwe World Heritage Site
2001 - 2002:	**CRM Archaeologists,** For R & R Cultural Resource Consultants, Polokwane
2000:	**Museum Assistant**, Fort Klapperkop.

Countries of work experience include:

Republic of South Africa, Botswana, Zimbabwe, Mozambique, Tanzania, The Democratic Republic of the Congo, Lesotho and Zambia.

SELECTED PROJECTS INCLUDE:

Archaeological Impact Assessments (Phase 1)

Heritage Impact Assessment Proposed Discharge Of Treated Mine Water Via The Wonderfontein Spruit Receiving Water Body Specialist as part of team conducting an Archaeological Assessment for the Mmamabula mining project and power supply, Botswana

Archaeological Impact Assessment Mmamethlake Landfill

Archaeological Impact Assessment Libangeni Landfill

Linear Developments

Archaeological Impact Assessment Link Northern Waterline Project At The Suikerbosrand Nature Reserve

Archaeological Impact Assessment Medupi – Spitskop Power Line,

Archaeological Impact Assessment Nelspruit Road Development

Renewable Energy developments

Archaeological Impact Assessment Karoshoek Solar Project

Grave Relocation Projects

Relocation of graves and site monitoring at Chloorkop as well as permit application and liaison with local authorities and social processes with local stakeholders, Gauteng Province.

Relocation of the grave of Rifle Man Maritz as well as permit application and liaison with local authorities and social processes with local stakeholders, Ndumo, Kwa Zulu Natal.

Relocation of the Magolwane graves for the office of the premier, Kwa Zulu Natal

Relocation of the OSuthu Royal Graves office of the premier, Kwa Zulu Natal

Phase 2 Mitigation Projects

Field Director for the Archaeological Mitigation For Booysendal Platinum Mine, Steelpoort, Limpopo Province. Principle investigator Prof. T. Huffman

Monitoring of heritage sites affected by the ARUP Transnet Multipurpose Pipeline under directorship of Gavin Anderson.

Field Director for the Phase 2 mapping of a late Iron Age site located on the farm Kameelbult, Zeerust, North West Province. Under directorship of Prof T. Huffman.

Field Director for the Phase 2 surface sampling of Stone Age sites effected by the Medupi – Spitskop Power Line, Limpopo Province

Heritage management projects

Platreef Mitigation project – mitigation of heritage sites and compilation of conservation management plan.

MEMBERSHIP OF PROFESSIONAL ASSOCIATIONS:

- Association of Southern African Professional Archaeologists. Member number 159

  Accreditation:
  - Field Director Iron Age Archaeology
  - Field Supervisor Colonial Period Archaeology, Stone Age Archaeology and Grave Relocation
- Accredited CRM Archaeologist with SAHRA
- Accredited CRM Archaeologist with AMAFA
- Co-opted council member for the CRM Section of the Association of Southern African Association Professional Archaeologists (2011 – 2012)

PUBLICATIONS AND PRESENTATIONS

- A Culture Historical Interpretation, Aimed at Site Visitors, of the Exposed Eastern Profile of K8 on the Southern terrace at Mapungubwe.
  - J van der Walt, A Meyer, WC Nienaber
  - Poster presented at Faculty day, Faculty of Medicine University of Pretoria 2003
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- Fieldwork Report: Mapungubwe Stabilization Project.
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- A War Uncovered: Human Remains from Thabantšho Hill (South Africa), 10 May 1864.
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  - Paper read at the 12th Congress of the Pan-African Archaeological Association for Prehistory and Related Studies 2005
- Field Report on the mitigation measures conducted on the farm Bokfontein, Brits, North West Province .
  - J van der Walt, P Birkholtz, W. Fourie
  - Paper read at the Southern African Association of Archaeologists Biennial Conference 2007
- Field report on the mitigation measures employed at Early Farmer sites threatened by development in the Greater Sekhukhune area, Limpopo Province. J van der Walt
  - Paper read at the Southern African Association of Archaeologists Biennial Conference 2008
- Ceramic analysis of an Early Iron Age Site with vitrified dung, Limpopo Province South Africa.
  - J van der Walt. Poster presented at SAFA, Frankfurt Germany 2008

- Bantu Speaker Rock Engravings in the Schoemanskloof Valley, Lydenburg District, Mpumalanga (*In Prep)*
    - J van der Walt and J.P Celliers
- Sterkspruit: Micro-layout of late Iron Age stone walling, Lydenburg, Mpumalanga. W. Fourie and J van der Walt. A Poster presented at the Southern African Association of Archaeologists Biennial Conference 2011
- Detailed mapping of LIA stone-walled settlements' in Lydenburg, Mpumalanga. J van der Walt and J.P Celliers
    - Paper read at the Southern African Association of Archaeologists Biennial Conference 2011
- Bantu-Speaker Rock engravings in the Schoemanskloof Valley, Lydenburg District, Mpumalanga. J.P Celliers and J van der Walt
    - Paper read at the Southern African Association of Archaeologists Biennial Conference 2011
- Pleistocene hominin land use on the western trans-Vaal Highveld ecoregion, South Africa, Jaco van der Walt.
    - J van der Walt. Poster presented at SAFA, Toulouse, France. Biennial Conference 2016

REFERENCES:

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