# HERITAGE IMPACT ASSESSMENT

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

#### FOR THE PROPOSED CONSTRUCTION OF A 66kV DEVIATION POWERLINE (± 400 METERS IN LENGTH) FROM THE EXISTING KNOBEL-GILEAD DISTRIBUTION POWERLINE, MOLEMOLE LOCAL MUNICIPALITY, LIMPOPO PROVINCE

#### Type of development:

Powerline

Client:

GA Environmental

Developer:

Eskom Holdings SoC Ltd

Report prepared by:



Report Author: Mr. J. van der Walt <u>Project Reference:</u> Project number 23052 <u>Report date:</u> June 2023

## Beyond Heritage

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#### APPROVAL PAGE

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Project Name	Proposed construction of a 66kv deviation powerline (± 400 meters in length) from the existing Knobel-Gilead distribution powerline, Molemole Local Municipality, Limpopo Province
Report Title	Heritage Impact Assessment for the Proposed construction of a 66kv deviation powerline (± 400 meters in length) from the existing Knobel-Gilead distribution powerline, Molemole Local Municipality, Limpopo Province
Authority Reference Number	ТВС
Report Status	Draft Report
Applicant Name	Eskom Holdings SoC Ltd

Responsibility	Name	Qualifications and Certifications	Date
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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 Environmental Impact Assessment (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.

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#### Table 1. Specialist Report Requirements.

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of -	Section a
(i) the specialist who prepared the report; and	Section 12
(ii) the expertise of that specialist to compile a specialist report including a	
curriculum vitae	
(b) Declaration that the specialist is independent in a form as may be specified by the	Declaration of
competent authority	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, 7and 8.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed	9
development and levels of acceptable change;	
(d) Duration, Date and season of the site investigation and the relevance of the season	Section 3.4
to the outcome of the assessment	
(e) Description of the methodology adopted in preparing the report or carrying out the	Section 3
specialised process inclusive of equipment and modelling used	
(f) details of an assessment of the specific identified sensitivity of the site related to	Section 8 and 9
the proposed activity or activities and its associated structures and infrastructure,	
inclusive of site plan identifying site alternatives;	
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) Map superimposing the activity including the associated structures and	Section 8
infrastructure on the environmental sensitivities of the site including areas to be	
avoided, including buffers	
(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	Section 1.3
of the proposed activity including identified alternatives on the environment or	
(k) Mitigation measures for inclusion in the EMPr	Section 10.1
(I) Conditions for inclusion in the environmental authorisation	Section 10. 1.
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10. 5.
(n) Reasoned opinion -	Section 10.3
(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	Os stien E
(0) Description of any consultation process that was undertaken during the course of	Section 5
(a) A summary and earlies of any commants received during any commutation areas	Defende DAD remark
(p) A summary and copies of any comments received during any consultation process	Refer to BAR report
and where applicable all responses thereto, and	Ν Δ
(q) Any other information requested by the competent authority	N.A



#### **Executive Summary**

GA Environment was appointed as the Environmental Assessment Practitioner (EAP) by Eskom Holdings SoC Ltd for the construction of a ± 400m long 66kV deviation powerline from the existing Knobel-Gilead distribution powerline. The powerline is located on Farm Lanark 199 LS between two villages (Ga-Phagodi and Masetlong in Molemole Local Municipality Ward 15) and is approximately 60km northwest of Polokwane. The objective of the proposed project is to upgrade the existing 66kV powerline to 132kV powerline in order to feed the Gilead substation due to increased demand of electricity in the area largely as a result of expanding and new residential areas. Beyond Heritage was appointed to conduct a Heritage Impact Assessment (HIA) focusing on the development footprint that was assessed on a desktop level and by a non-intrusive pedestrian field survey. Key findings of the assessment include:

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- The study area is undulating without any major topographical features like pans or rocky outcrops that would have been focal points for heritage sites in antiquity. Furthermore, no raw material suitable for stone tool manufacture exists or rocky boulders for the construction of Iron Age stone-walled settlements. The project area is therefore considered to be of low heritage potential;
- This was confirmed during the survey and no heritage finds of significance were identified;
- The palaeontological sensitivity of the study area is insignificant/zero, and no further palaeontological studies are required.

The impact on heritage resources is low, and the project can commence provided that the recommendations in this report are adhered to, based on the South African Heritage Resource Authority (SAHRA) 's approval.

#### **Recommendations:**

• Regular monitoring of the development footprint by the ECO to implement the Chance Find Procedure for heritage resources (outlined in Section 9.2) in case heritage resources are uncovered during construction.



#### **Declaration of Independence**

Specialist Name	Jaco van der Walt	
Declaration of Independence	<ul> <li>I declare, as a specialist appointed in terms of the National Environmental Management Act (NEMA) (Act No 107 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations (as amended), that I: <ul> <li>I act as an independent specialist in this application;</li> <li>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;</li> <li>I declare that there are no circumstances that may compromise my objectivity in performing such work;</li> <li>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;</li> <li>I will comply with the Act, Regulations, and all other applicable legislation;</li> <li>I have no, and will not engage in, conflicting interests in the undertaking of the activity;</li> <li>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;</li> <li>All the particulars furnished by me in this form are true and correct; and</li> <li>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.</li> </ul></li></ul>	
Signature	Aust.	
Date	07/06/2023	

## a) Expertise of the specialist

Jaco van der Walt has been practising as a Cultural Resource Management (CRM) archaeologist for 15 years. Jaco is an accredited member of the Association of South African Professional Archaeologists (ASAPA) (#159) and APHP #114 and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, Kwa Zulu Natal (KZN) as well as the Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, Democratic Republic of the Congo (DRC) Zambia, Guinea, Afghanistan, Nigeria and Tanzania. Through this, he has a sound understanding of the International Finance Corporations (IFC) Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage



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### ABBREVIATIONS

ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DFFE: Department of Fisheries, Forestry and Environment,
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EAP Environmental Assessment Practitioner
EMPr: 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, 2002 (Act No. 28
of 2002)
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:

Beyond Heritage was appointed to conduct a HIA for the proposed construction of a  $\pm$  400m long 66kV deviation powerline from the existing Knobel-Gilead distribution powerline. The powerline is located on the Farm Lanark 199 LS between two villages (Ga-Phagodi and Masetlong in Molemole Local Municipality Ward 15) and is approximately 60km northwest of Polokwane (Figure 1.1 to 1.3). The report forms part of the Basic Assessment (BA) and Environmental Management Programme Report (EMPr) for the development.

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, no heritage sites or features 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, compiled in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA for commenting. Upon submission to SAHRA the project will be automatically given a case number as reference. As such the EIA 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 development.

## 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).



### 1.2 Project Description

Project components and the location of the proposed project are outlined under Table 2 and 3.

#### Table 2: Project Description

Project area	Farm Lanark 199 LS between two villages (Ga-Phagodi and
	Masetlong in Molemole Local Municipality Ward 15) and is
	approximately 60km northwest of Polokwane
Magisterial District	Molemole Local Municipality Ward 15
Central co-ordinate of the	23° 29' 33.8879" S
development	29° 08' 14.8509" E
Topographic Map Number	2427DD

#### Table 3: Infrastructure and project activities

Type of development	Powerline
Size of Project area	~400m
Project Components	Powerline

### 1.3 Alternatives

No alternatives were provided, but the area assessed allows for siting of the development to avoid impacts to heritage resources.





#### HIA – Eskom Knobel-Gilead 66kV Deviation Powerline

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Figure 1.1. Regional setting of the project (1: 250 000 topographical map).

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Figure 1.2. Local setting of the project (1: 50 000 topographical map).

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#### HIA – Eskom Knobel-Gilead 66kV Deviation Powerline

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HIA – Eskom Knobel-Gilead 66kV Deviation Powerline	June 2023

#### 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))

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 (or avoidance) of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the Provincial Heritage Resource Agency (PHRA) or to SAHRA. SAHRA will ultimately be responsible for the evaluation of Phase 1 HIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 HIA 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 HIA 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 postuniversity 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 Southern African Development Community (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 HIA'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 include (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.

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Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36 and GNR 548 as well as the SAHRA BGG Policy 2020. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (NHRA), as well as the National Health Act of 2003 and are under 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

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) re-instituted by Proclamation 109 of 17 June 1994 and implemented by CoGHSTA as well as the National Health Act of 2003 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. . 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 the National Health Act of 2003.

### 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 fieldwork phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

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## HIA – Eskom Knobel-Gilead 66kV Deviation Powerline

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#### 3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any EA 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 (conducted by the EAP) process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings.

#### 3.4 Site Investigation

The aim of the site visit was to:

- a) survey the proposed project area to understand the heritage character of the development footprint;
- 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	6 December 2022
Season	Summer – The time of year did influence the survey as the study area is overgrown that limited heritage visibility in some areas. The survey focussed on the development footprint that was sufficiently covered to understand the heritage character of the area (Figure 3.1).





Figure 3.1. Tracklog of the survey path in green.

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## 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 (2007), 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

Table 5: Heritage significance and field ratings

## 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 heritage resources, the possibility of discovery of heritage resources during the construction phase cannot be excluded. This is not seen as s a major limitation since the development footprint was sufficiently covered. This is further mitigated with the implementation of a chance find procedure and monitoring of the study area by the ECO. This report only deals with the current layout of the proposed development and consists of non-intrusive surface surveys that focused on tangible resources. 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.

Field data were recorded by handheld GPS and Mobile GPS applications. It must be noted that during the process of converting spatial data to final drawings and maps the accuracy of spatial data may be compromised. Printing or other forms of reproduction might also distort the spatial distribution in maps. Due care has been taken to preserve accuracy. 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 Environment

The following information was obtained from the Molemole Local Municipality IDP 2018/ 2019: "Molemole Local Municipality (MLM) is located in the Capricorn District Municipality (CDM) in the Limpopo Province. The Molemole Local Municipality head office is located 65 kilometers from the North of Polokwane along the R521, with a population of approximately 132, 321 people. The majority of the population is comprised of Black Africans (98.1%) with a minority of whites and Indians and which equates to only 1.9% of the population. Molemole Local Municipality has a population density of 31.9 persons per square kilometer, which is lower than the district, provincial and national averages of 75.1, 43.2 and 40.9, persons per square kilometers respectively which infers that the municipality is sparsely populated relative to the district, province and South Africa. Molemole Local Municipality covers an area of 3347km<sup>2</sup>.

According to Molemole LED Strategy, finance and business sector accounts for 24% of the of the Gross Geographic Product (GGP) of the Molemole Municipality, followed by government services at 21%, then agriculture at 14% followed by wholesale and retail trade at 12% which could be regarded as relatively better performing sectors."

## 5 Results of Public Consultation and Stakeholder Engagement:

## 5.1.1 Stakeholder Identification

Adjacent landowners and the public at large were informed of the proposed activity as part of the BA process by the EAP. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process. No heritage concerns have been raised thus far.

## 6 Literature / Background Study:

### 6.1 Literature Review (SAHRIS)

Few sites are known for the greater region and the following Cultural Resource Management (CRM) assessments (Table 6) were conducted in the area and consulted for this report:

Author	Year	Project	Findings
Van der Walt, J.	2018	Heritage Impact Assessment Lanark Solar Plant	No heritage sites
Hutton, M	2013	Heritage Impact Assessment for the proposed water supply infrastructure for the residential clusters of Tshamahansi, Sekuruwe, Seema, Phafola, Maala Perekisi, Witrivier and Millennium Park in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.	One stone packed feature
Pistorius, J.C.C.	2012	A Phase I Heritage Impact Assessment (HIA) Study for Eskom's Proposed New 132kv Power Lines Running Between the Polokwane And Chloe Substations and Between the Chloe And Gilead Substations as Well as A T- Off to The Moletsi Substation in The Limpopo Province of South Africa.	Numerous graveyards

#### Table 6. CRM reports consulted for the study.

## 6.1.1 Google Earth and The Genealogical Society of South Africa (Graves and burial sites)

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located. The database of the Genealogical Society of South Africa indicated no known grave sites within the study area.

## 6.2 Archaeological Background

The archaeology of the area can be divided in three main periods namely the Stone Age, Iron Age and Historical period.

## 6.2.1 Stone Age

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 (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. The three main phases can be divided as follows;

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

## 6.2.1.1 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 only been found in rock shelters such as the Sterkfontein Caves (Kuman, 1998) and also in Makapan Valley in the caves in this 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. However, isolated finds have little value. Therefore, the project is unlikely to disturb a significant site. Evidence suggests that the region surrounding the project area has been inhabited during all periods of the Stone Age, including the Early Stone Age (ESA), Middle Stone Age (MSA) and Later Stone Age (LSA). This is most evident and extensively documented at the Cave of Hearths in the Makapans Valley some 30 km to the east (McNabb & Binyon, 2004; Phillipson, 2005). Fourie (2002) reported on a possible ESA core found on the surface to the south west of the study area.

Makapans Valley was declared a World Heritage Site in 2005. The UNESCO website states the following: "Fossils found in the many archaeological caves of the Makapan Valley have enabled the identification of several specimens of early hominids, more particularly of Paranthropus, dating back between 4.5 million and 2.5 million years, as well as evidence of the domestication of fire 1.8 million to 1 million years ago." (UNESCO, 2013).

The proposed development is located outside of the buffer zone of the World Heritage Site and no impact is foreseen on the site.

## 6.2.1.2 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 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).

## 6.2.1.3 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 West (Van der Ryst, 1998). According to Bergh (1999) some rock paintings, are known 20 to 30 km northeast of Mokopane and the Archaeological database at Wits also have paintings on record to the east of the study area on the Planknek Mountain range. Scatters of Stone Age artefacts in the open are usually poorly preserved and therefore have less value than sites in caves or rock shelters. As there are no caves in the study area, there is a low possibility of finding sites of high significance in the area.

## 6.2.2 The Iron Age

The Iron Age as a whole represents the spread of Bantu speaking people and includes both the pre-Historic and Historic periods. The Iron Age is characterised by the ability of these early people to manipulate and work Iron ore into implements that assisted them in creating a favourable environment to make a better living. The Iron Age is divided into three distinct periods:

- The Early Iron Age: Most of the first millennium AD.
- The Middle Iron Age: 10th to 13th centuries AD
- The Late Iron Age: 14th century to colonial period.

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-anddaga (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 may occur.

According to the most recent archaeological cultural distribution sequences by Huffman (2007), the study 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- 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) Eiland facies AD 1000 – 1300 (Middle Iron Age) Klingbeil facies AD 1000 - 1200 (Middle Iron Age) Letaba facies AD 1600 - 1840 (Late Iron Age)

This could include the Mzonjani facies of the Urewe Tradition, dating to between AD450 and AD750 (Huffman 2007); the Doornkop facies of the Kalundu Tradition (AD750 to AD1000); the Eiland facies of the same tradition dating between AD1000 and AD1300; the Icon facies of the Urewe Tradition (AD1300-1500), as well as the Letaba facies of Kalundu, dating to between AD1600 – AD1840.

Changiuon (1986) describes mainly five groups who resided in the area where the town of Pietersburg would later be established, namely Maletzie, Maraba, Zebediela, Ramagoepoe and Chuenie. Bergh (1999) also indicates a number of tribes who resided in the Polokwane area in the 1800's namely the Moletsi/ Kwena, Koni of Matlala, Koni of Dikgale, Koni of Mmamabolo, Koni of Mothiba and also the Ndebele of Langa and Kgaga of Mothapo.

## 6.3 Historical background

Few Afrikaner people visited the Zoutpansberg Region before the first Voortrekker Leaders, Louis Tregardt (1783–1838) and Lang Hans van Rensburg crossed the Pietersburg Plateau during 1836. They were merely travelling through the area and only during 1848 did Andries Hendrik Potgieter (1792-1852) arrive to establish a permanent Afrikaner settlement in this part of the world. This was agreed with Tregardt ten years earlier.

Andries Hendrik Potgieter set up the first Afrikaner settlement in Ohrigstad in 1845, some distance from Pietersburg. Later some Voortrekkers moved with Potgieter late in 1848 and settled in a town they called Zoutpansberg-dorp, about 100 km Northwest of the current town of Polokwane. This was later changed to Schoemansdal.

"Swart" Barend Vorster and some other families settled to the north of the present town during the winter of 1847 in anticipation to the arrival of Potgieter. Potgieter moved to the Zoutpansberg but many Voortrekkers chose farmland on the plateau. Amongst those were ancestors of present-day community leaders, including the Vorster, Duvenhage, Snyman, Vercueil and Grobler-families.

Meanwhile, the Volksraad, acting on a request from Potgieter, founded a town in Makapanspoort called Vredenburg. Later renamed Potgietersrus, it became the neighbour of Pietersburg, a town of similar size some 60km to the south, and part of the ZAR.

The constitution of the Republic excluded Black, Indian and Coloured people from exercising equal rights in both Church and State, and the official language was Dutch. The Transvaal tended to rely on Holland for guidance in religious and educational matters, and many teachers and ministers migrated to the ZAR from Holland.

Potgieter died in December 1852, and his son Piet Potgieter succeeded him. In 1854 Hermanus Potgieter, brother of Piet, was killed during clashes with Chief Makapaan. Piet mobilised a command and drove Makapaan into hiding in a cave, where he was besieged. Both Makapaan and Piet Potgieter were killed in the episode, and Vredenburg was renamed Pietpotgietersrus in honour of the leader.

Potgieter's widow married Stephanus Schoeman, who became Acting Commandant General of the Zoutpansberg in 1855. He renamed the area Schoemansdal, after himself.

The Venda under Magato challenged the Boers' overgrazing and hunting territory and Paul Kruger and his troops were forced to abandon Schoemansdal, which was razed to the ground in 1867.

Many living in Pietpotgietersrus died of malaria, and by April 1870 the town had to be abandoned. They returned in 1890, and made Marabastad, the northernmost point of the ZAR, the seat of the Landdrost.

When gold was discovered on the farm Eersteling in 1871, the first gold rush in the Transvaal followed. An influx of uitlanders (foreigners) began to pose a political problem. President Burgers sought to end the isolation of the Transvaal by developing relations with non-English colonial powers, and in 1875 began a round of negotiations with Portugal to secure access to the sea via a rail link to Delagoa Bay.

The British annexed the Transvaal in 1877, rendering the Boers British subjects. The increasingly hostile relations with the Zulu and Pedi became a problem for both the Boers and the British. A bloody war between the Boers, British and Pedi broke out on 28 November 1879, lasting until 2 December of the same year. A white army in alliance with a 12000-strong Swazi contingent defeated the Pedi standing army of 10000, with King Sekhukhune I losing his brothers and sons.

The Boers, unhappy with British domination, rallied and the first Anglo-Boer War broke out from 1880 to 1881. The victory of the Boers, sealed after the Battle of Majuba, led to the granting of self-government – under the suzerainty of the Queen. The victory was celebrated in the Zoutpansberg district on 16 December 1881 initiated a renewed gold rush, with prospectors converging on the village of Marabastad.

With Potgietersrus and Schoemansdal abandoned, the Boers had to decide where to establish a new capital. In 1883 General Petrus Jacobus (Piet) Joubert was appointed to find a site to compensate the Boers who had been forced to leave Schoemansdal 16 years earlier, and the farm Sterkloop was chosen as an appropriate site.

Joubert presented his findings to the Executive Council in Pretoria and a land surveyor was appointed to map out the new town, which was called Pietersburg.

The site, the property of BJ Vorster and Gert Emmenis, was bought by the government on 29 January 1884, and land surveyor GR von Wielligh set out 150 plots, 94 of which were given free of charge to people who had lost land in Schoemansdal. The remainder was sold for six pounds each.

According to most records Pietersburg was named after a well-known General, Petrus (Piet) Jacobus Joubert. According to www. sahistory.co.za, however the town was named after of a respected pioneer and elder, one P.J.L. (Pieter) Venter (1811–1894). He was appointed the first Elder of the Hervormde Church, the then State Church of the Z.A.R., in the Ward Zoutpansberg, two years before the Church inaugurated him.

The secretary to the Executive recorded that the new town was to be called Pietersburg, and wrote in the records that it was the Commandant General who had been honoured in this way. Up to today the official records still claim Piet Joubert to be the one whose name was given to this frontier town.

## 6.2.3. Anglo-Boer War

The Anglo-Boer War was the greatest conflict that had taken place in South Africa up to date and also affected the Polokwane district. The British built a concentration camp at the then called Pietersburg during the Boer War to house almost 4,000 Boer women and children. Pietersburg was the northernmost camp in the Transvaal system, isolated and difficult to service (www2.lib.uct.ac.za/mss/bccd/Histories/Pietersburg/).

## 7 Findings of the Survey

## 7.1 Description of the Physical Environment

The project area is vacant land used for grazing and due to overgrazing archaeological visibility is high. No major landmarks like pans, rivers or rocky outcrops that were focal points for human activity occur in the study area. The study area is flat with scattered trees across the landscape, Euphorbias being one of the more dominant. General site conditions are illustrated in Figure 7.1 to 7.8.



Figure 7.1. General site conditions in the proposed project area.

Figure 7.2. General site conditions in the project area.



Figure 7.3. Image showing the existing infrastructure in the surrounding area.



Figure 7.4. Image showing the vegetation in the project area.

## 7.2 Heritage Resources

The local geology consists of dark grey mud rock (Chronostratigraphic Geology of South Africa 1:1,000,000 map) and no raw material suitable for the manufacturing of Stone Tools occur in the area. Similarly, no rock occurs to construct Late Iron Age stone walled settlements and no evidence of Iron Age material was recorded during the study. Areas more suitable for occupation in antiquity is found to the south around Polokwane and to the North towards the Soutpansberg where well known archaeological sites occur. In terms of the national estate as defined by the NHRA, no sites of significance were found during the survey as described below.

## 7.3 Cultural Landscape

The project area is situated in a largely undeveloped rural area. Human intervention is limited to electrical infrastructure and roads without any structures which are older than 60 years. The larger area is characterised by small settlements (Figure 8.1 & 8.2).



Figure 7.5. 1970 Topographic map indicating no developments within the project area.



Figure 7.6. 1983 Topographic map indicating no new developments in the project area. Roads are indicated in the surrounding area.



Figure 7.7. 2005 Topographic map of the study area indicating no developments in the study area.

#### 7.4 Paleontological Heritage

The study area is indicated as of insignificant/zero paleontological significance on the SAHRA Paleontological map (Figure 8.3) and no further palaeontological studies are required.



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 7.8. Paleontological sensitivity of the approximate study area (yellow polygon) as indicated on the SAHRA Palaeontological sensitivity map.

## 8 Potential Impact

Due to the lack of any heritage significant finds within the project area the impact to heritage resources is considered to be low. Any additional effects to subsurface heritage resources can be successfully mitigated by implementing a chance find procedure. Mitigation measures as recommended in this report should be implemented during all phases of the project. Impacts of the project on heritage resources is expected to be low during all phases of the development.

## 8.1.1 Pre-Construction phase

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure. These activities can have a negative and irreversible impact on heritage features if any occur. Impacts include destruction or partial destruction of non-renewable heritage resources but is considered to be unlikely to manifest as no heritage significant features were recorded.

## 8.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. Potential impacts include destruction or partial destruction of non-renewable heritage resources but is considered to be unlikely to manifest as no heritage significant features were recorded.

## 8.1.3 Operation Phase

No impacts are expected during the operation phase.

## 8.1.4 Impact Assessment for the project

### Table 7. Impact assessment of the Project area.

*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 and paleontological material or objects.

	Without mitigation	With mitigation (Preservation/	
		excavation of site)	
Extent	Local (2)	Local (2)	
Duration	Permanent (5)	Permanent (5)	
Magnitude	Minor (1)	Minor (1)	
Probability	Improbable (2)	Improbable (2)	
Significance	16 (Low)	16 (Low)	
Status (positive or negative)	Negative	Negative	
Reversibility	Not reversible	Not reversible	
Irreplaceable loss of	Yes	Yes	
resources?			
Can impacts be mitigated?	NA	NA	
Mitigation:			

• Implementation of a Chance Find Procedure for the project.

## Cumulative impacts:

The proposed project will have a low cumulative impact as no significant heritage resources will be adversely affected.

## **Residual Impacts:**

Although surface sites can be avoided or mitigated, there is a chance that completely buried sites would still be impacted on, but this cannot be quantified.

## 9 Conclusion and recommendations

The study area is undulating without any major topographical features like pans or rocky outcrops that would have been focal points for heritage sites in antiquity. Furthermore, no raw material suitable for stone tool manufacture exist or rocky boulders for the construction of Iron Age stone walled settlements. The project area is considered to be of low heritage potential and this was confirmed during the survey and no heritage finds of significance were identified. The palaeontological sensitivity of the study area is insignificant/zero and no further palaeontological studies are required.

No adverse impact to heritage resources is expected by the project and it is recommended that the project can commence on the condition that the following recommendations are implemented as part of the EMPr and based on approval from SAHRA.

### 9.1 Recommendations for condition of authorisation

The following recommendations for Environmental Authorisation apply and the project may only proceed based on approval from SAHRA:

### **Recommendations:**

• Regular monitoring of the development footprint by the ECO to implement the Chance Find Procedure for heritage resources (outlined in Section 10.2) in case heritage resources are uncovered during construction.

## 9.2 Chance Find Procedures

#### 9.2.1 Heritage Resources

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 and monitoring guidelines applicable to the Chance Find procedure is discussed below and monitoring guidelines for this procedure are provided in Section 10.5.

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.

## 9.3 Reasoned Opinion

The overall impact of the project is considered to be low and residual impacts can be managed to an acceptable level through implementation of the recommendations made in this report. The socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures are implemented for the project.

## 9.4 Potential risk

Potential risks to the proposed project are the occurrence of intangible features, sub surface cultural material and unrecorded burial sites. This can cause delays during construction, as well as additional costs involved in mitigation, as well as possible layout changes.

#### 9.5 Monitoring Requirements

Day to day monitoring can be conducted by the Environmental Control Officers (ECO). The ECO or other responsible persons should be trained along the following lines:

- Induction training: Responsible staff identified by the developer should attend a short course on heritage management and identification of heritage resources.
- Site monitoring and watching brief. As most heritage resources occur below surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are from pre-construction and construction activities. The ECO should monitor all such activities daily. If any heritage resources are found, the chance finds procedure must be followed as outlined above.

Heritage Monitoring									
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method				
Cultural Resources chance finds	Entire project area	ECO	Weekly (Pre construction and construction phase)	Proactively	• If risks are manifested (accidental discovery of heritage resources) the chance find procedure should be implemented:				
					1. Cease all works immediately;				
					<ol> <li>Report incident to the Sustainability Manager;</li> </ol>				
					<ol> <li>Contact an archaeologist/ palaeontologist to inspect the site;</li> </ol>				
									<ol> <li>Report incident to the competent authority; and</li> </ol>
					<ol> <li>Employ reasonable mitigation measures in accordance with the requirements of the relevant authorities.</li> </ol>				

#### Table 8. Monitoring requirements for the project

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
					Only recommence operations once impacts have been mitigated.

### 9.6 Management Measures for inclusion in the EMPr

Table 9. Heritage Management Plan for EMPr implementation

Area	Mitigation measures	Phase	Timeframe	Responsible	Target	Performance
				party for		indicators
				implementation		(Monitoring tool)
General project area	Implement chance find procedures in case possible heritage finds are uncovered	Construction	Throughout the project	Applicant EAP	Ensure compliance with relevant legislation and recommendations	ECO Checklist/Report
					from SAHRA under Section 35, 36 and 38 of NHRA	
General Project area	Regular monitoring of the development footprint by the ECO	Construction	Throughout the project	Applicant EAP	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 35, 36 and 38 of NHRA	ECO Checklist/Report

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