

Archaetnos Culture & Cultural Resource Consultants BK 98 09854/23

#### A REPORT ON A CULTURAL HERITAGE IMPACT ASSESSMENT DONE FOR PROPOSED QUARRIES ON THE FARM HARRIET'S WISH 393 LR, PORTIONS 12 AND 13, FORMING PART OF THE PLATINUM GROUP METALS WATERBERG PROSPECTING AREA, LIMPOPO PROVINCE

For:

Platinum Group Metals (RSA) (Pty) Ltd gertenes@lantic.net



**REPORT NO.: AE02232V** 

By:

Prof. A.C. van Vollenhoven (L.AKAD.SA.) Accredited member of ASAPA Accredited member of SASCH, Johan Smit, BA (Hons) & Daniël Viljoen (BA Hons)

28 September 2022

Archaetnos P.O. Box 55 GROENKLOOF 0027 Tel: 083 291 6104 Fax: 086 520 4173 E-mail: antonv@archaetnos.co.za

Member: AC van Vollenhoven BA, BA (Hons), DTO, NDM, MA (Archaeology) [UP], MA (Culture History) [US], DPhil (Archaeology) [UP], Man Dip [TUT], D Phil (History) [US]

#### SUBMISSION OF REPORT

### SUBMISSION OF REPORT

Please note that the South African Heritage Resources Agency (SAHRA) or one of its subsidiary bodies needs to comment on this report.

It is the client's responsibility to do the submission via the SAHRIS System on the SAHRA website.

Clients are advised not to proceed with any action before receiving the necessary comments from SAHRA.

#### DISCLAIMER

Although all possible care is taken to identify all sites of cultural importance during the survey of study areas, the nature of archaeological and historical sites is as such that it always is possible that hidden or subterranean sites could be overlooked during the study. Archaetnos and its personnel will not be held liable for such oversights or for costs incurred as a result thereof.

Should it be necessary to visit a site again as a result of the above mentioned, an additional appointment is required.

Reasonable editing of the report will be done upon request by the client if received within 60 days of the report date. However, editing will only be done once, and clients are therefore requested to send all possible changes in one request. Any format changes or changes requested due to insufficient or faulty information provided to Archaetnos on appointment, will only be done by additional appointment.

Any changes to the scope of a project will require an additional appointment.

#### ©Copyright Archaetnos

The information contained in this report is the sole intellectual property of Archaetnos CC. It may only be used for the purposes it was commissioned for by the client.

# **EXECUTIVE SUMMARY**

Archaetnos cc was requested by the Platinum Group Metals (RSA) Pty) Ltd to conduct a cultural heritage impact assessment (HIA) for a proposed Quarries as part of the Waterberg Mining development. The Project lies to the west of the town of Bochum in the Limpopo Province. The HIA was done on portions 12 and 13 of the farm Harriet's Wish 393 LR.

The field survey for the project was conducted according to generally accepted HIA practices and was aimed at locating possible objects, sites and features of cultural significance in the area of proposed development. One regularly looks a bit wider than the demarcated area, as the surrounding context needs to be taken into consideration. However, since the area is extremely large the study is merely an indication of what cultural resources can be expected in the area.

No sites of cultural importance were identified in the study area.

The following is recommended:

- This report is seen as ample mitigation.
- The project may continue, but only after receiving the necessary comments from SAHRA as well as the implementation of the mitigation measures indicated below.
- It should always be noted that the subterranean presence of archaeological and/or historical sites, features or artefacts is always a distinct possibility. Care should therefore be taken when development commences that if any of these are discovered, a qualified archaeologist be called in to investigate the occurrence.

It is also important to take cognizance that it is the client's responsibility to do the submission of this report via the SAHRIS System on the SAHRA website. No work on site may commence before receiving the necessary comments from SAHRA.

# CURRICULUM VITAE <u>Prof. Anton Carl van Vollenhoven</u>

# PERSONAL INFORMATION

- Born: 20 January 1966, Pretoria, RSA
- Address: Archaetnos, PO Box 55, Groenkloof, 0027
- Cell phone: 083 291 6104
- Nationality: RSA
- E-mail: antonv@archaetnos.co.za

# TERTIARY EDUCATION

- BA 1986, University of Pretoria
- BA (HONS) Archaeology 1988 (cum laude), University of Pretoria
- MA Archaeology 1992, University of Pretoria
- Post-Graduate Diploma in Museology 1993 (cum laude), University of Pretoria
- Diploma Tertiary Education 1993, University of Pretoria
- DPhil Archaeology 2001, University of Pretoria.
- MA Cultural History 1998 (cum laude), University of Stellenbosch
- Management Diploma 2007 (cum laude), Tshwane University of Technology
- DPhil History 2010, University of Stellenbosch

# EMPLOYMENT HISTORY

### Current:

- August 2007 present Managing Director for Archaetnos Archaeologists.
- Since 2012: Archaeologist and heritage official, Department of Environment and Agriculture, City of Tshwane
- Since 2015: Extraordinary Professor of History at the North-West University

# Previous:

- 1988-1991: Fort Klapperkop Military Museum Researcher
- *1991-1999:* National Cultural History Museum. Work as Archaeologist, as well as Curator/Manager of Pioneer Museum (1994-1997)
- *1999-2002:* City Council of Pretoria. Work as Curator: Fort Klapperkop Heritage Site and Acting Deputy Manager Museums and Heritage.
- 2002-2007: City of Tswhane Metropolitan Municipality. Work as Deputy Manager Museums and Heritage.
- August 2007 present Managing Director for Archaetnos Archaeologists.
- 1988-2003: Part-time lecturer in Archaeology at the University of Pretoria and a parttime lecturer on Cultural Resources Management in the Department of History at the University of Pretoria.
- 2014-2015: Part-time lecturer for the Honours degree in Museum Sciences in the Department of History and Heritage Studies at the University of Pretoria
- 2020-2021: Part-time lecturer in History at the North-West University

# <u>OTHER</u>

• NRF C2 Research rating.

- Has published 41 peer-reviewed and 54 popular articles.
- Hs written 13 books/book contributions/conference proceedings .
- Has been the author and co-author of over 1076 unpublished reports on cultural resources surveys and archaeological work.
- Has delivered more than 83 papers and lectures at national and international conferences.
- Member of SAHRA Council for 2003 2006.
- Member of the South African Academy for Science and Art.
- Member of Association for South African Professional Archaeologists.
- Member of the South African Society for Cultural History (Chairperson 2006-2008; 2012-2014; 2018-2021).
- Has been editor for the SA Journal of Cultural History 2002-2004.
- Editorial member of various scientific journals.
- Member of the Provincial Heritage Resources Agency, Gauteng's Council.
- Member of Provincial Heritage Resources Agency, Gauteng's HIA adjudication committee (Chairperson 2012-2024).

A list of reports can be viewed on <u>www.archaetnos.co.za</u>.

# **DECLARATION OF INDEPENDENCE**

I, Anton Carl van Vollenhoven from Archaetnos, hereby declare that I am an independent specialist within the field of heritage management.

1 bllacher

Signed:

Date: 28 September 2022

# LIST OF ACRONYMS:

- AIA Archaeological Impact Assessment
- CMP Cultural Management Plan

EAP – Environmental Assessment Practitioner

- EIA Environmental Impact Assessment
- HIA Heritage Impact Assessment

PIA – Palaeontological Impact Assessment

SAHRA – South African Heritage Resources Agency

# CONTENTS

# Page

EXECUTIVE SUMMARY
1. INTRODUCTION7
2. TERMS OF REFERENCE10
3. *CONDITIONS AND ASSUMPTIONS10
4. LEGISLATIVE REQUIREMENTS11
5. METHODOLOGY14
6. DESCRIPTION OF THE AREA16
7. HISTORICAL CONTEXT19
8. DISCUSSION OF SITES IDENTIFIED DURING THE SURVEY33
9. CONCLUSIONS AND RECOMMENDATIONS
10.REFERENCES
APPENDIX A – DEFENITION OF TERMS

# 1. INTRODUCTION

Archaetnos cc was requested by the Platinum Group Metals (RSA) Pty) Ltd to conduct a cultural heritage impact assessment (HIA) for a proposed Quarries as part of the Waterberg Mining development. The Project lies to the west of the town of Bochum in the Limpopo Province (Figure 1-3). The HIA was done on portions 12 and 13 of the farm Harriet's Wish 393 LR (Figure 4-5).



Figure 1: Location of the town of Bochum and in the Limpopo Province. North reference is to the top.



Figure 2: Location of the surveyed site in relation to Bochum. North reference is to the top.

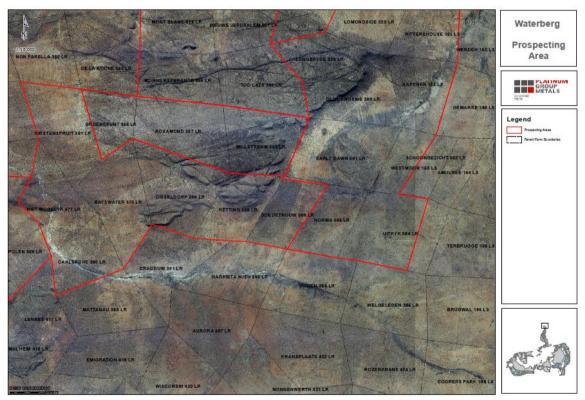


Figure 3: Map of the project area.

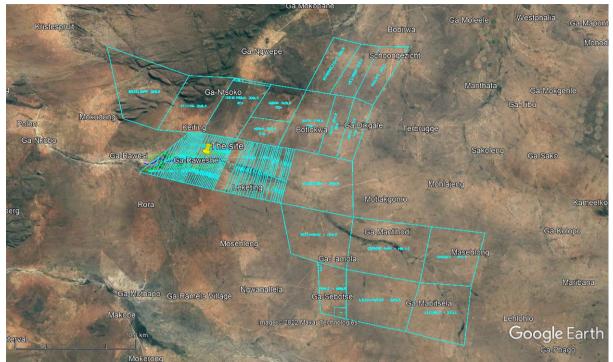


Figure 4: Location of the farm Harriet's Wish within the Waterberg Project.

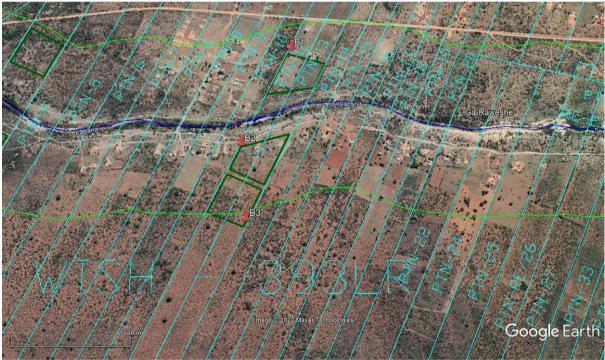


Figure 5: Portion 12 and 23 of Harriet's Wish, indicating the 3 proposed quarry positions (dark green).

# 2. TERMS OF REFERENCE

The Terms of Reference for the survey were to:

- Identify objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located on the property (see Appendix A).
- 2. Document the found cultural heritage sites according to best practice standards for heritage related studies.
- 3. Study background information on the area to be developed.
- Assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value (see Appendix B).
- 5. Describe the possible impact of the Project on these cultural remains, according to a standard set of conventions.
- 6. Recommend suitable mitigation measures to minimize possible negative impacts on the cultural resources by the proposed development.

### 3. CONDITIONS & ASSUMPTIONS

The following conditions and assumptions have a direct bearing on the survey and the resulting report:

- Cultural Resources are all non-physical and physical man-made occurrences, as well as natural occurrences associated with human activity (Appendix A). These include all sites, structure and artifacts of importance, either individually or in groups, in the history, architecture and archaeology of human (cultural) development. Graves and cemeteries are included in this.
- 2. The significance of the sites, structures and artifacts is determined by means of their historical, social, aesthetic, technological and scientific value in relation to their uniqueness, condition of preservation and research potential. The various aspects are not mutually exclusive, and the evaluation of any site is done with reference to any number of these aspects.
- 3. Cultural significance is site-specific and relates to the content and context of the site. Sites regarded as having low cultural significance have already been recorded in full and require no further mitigation. Sites with medium cultural significance may or may not require mitigation depending on other factors such as the significance of impact on the site. Sites with a high cultural significance require further mitigation (see Appendix C).

- 4. The **latitude and longitude** of any archaeological or historical site or feature, is to be treated as sensitive information by the developer and should not be disclosed to members of the public. This does not mean that other information about these sites may not be shared with the public.
- 5. All recommendations are made with full cognizance of the relevant legislation.
- 6. No social consultation process was undertaken as this is usually been dealt with by the environmental practitioner. Information relevant to heritage, if any, is then provided to the heritage specialist. No such issues were brought to the fore.
- 7. It has to be mentioned that it is almost impossible to locate all the cultural resources in a given area, as it will be very time consuming. Developers should however note that the report should make it clear how to handle any other finds that might occur.
- 8. The vegetation cover in most of the areas where low to medium in height and had an open under footing which had a positive effect on both the horizontal and the vertical archaeological visibility. The exception is in area B1 where the vegetation was low but had a thick under footing which had a negative effect on both the horizontal and the vertical archaeological visibility.

# 4. LEGISLATIVE REQUIREMENTS

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

#### 4.1 The National Heritage Resources Act

According to the above-mentioned act the following is protected as cultural heritage resources:

- a. Archaeological artifacts, structures and sites older than 100 years
- b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography
- c. Objects of decorative and visual arts
- d. Military objects, structures and sites older than 75 years
- e. Historical objects, structures and sites older than 60 years
- f. Proclaimed heritage sites
- g. Grave yards and graves older than 60 years
- h. Meteorites and fossils
- i. Objects, structures and sites of scientific or technological value.

The national estate (see Appendix D) includes the following:

a. Places, buildings, structures and equipment of cultural significance

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

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

- a. The construction of a linear development (road, wall, power line canal etc.) exceeding 300m in length
- b. The construction of a bridge or similar structure exceeding 50m in length
- Any development or other activity that will change the character of a site and exceed 5 000m<sup>2</sup> or involve three or more existing erven or subdivisions thereof
- d. Re-zoning of a site exceeding 10 000 m<sup>2</sup>
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority

#### **Structures**

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

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

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

#### Archaeology, palaeontology and meteorites

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

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

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

### Human remains

Graves and burial grounds are divided into the following:

- a. ancestral graves
- b. royal graves and graves of traditional leaders
- c. graves of victims of conflict
- d. graves designated by the Minister
- e. historical graves and cemeteries
- f. human remains

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

- a. destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
- b. destroy, damage, alter, exhume or remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
- c. bring onto or use at a burial ground or grave referred to in paragraph (a) or
  (b) any excavation, or any equipment which assists in the detection or recovery of metals.

All graves older than 60 years are called heritage graves and should be handled by an archaeologist. This includes archaeological graves, which are older than 100 years. Unidentified/unknown graves (which refers to date of death) are also handled as older than 60 until proven otherwise.

Unidentified/unknown graves are also handled as older than 60 until proven otherwise.

Human remains that are less than 60 years old are subject to provisions of the **National Health Act (Act 61 of 2003)** and to local regulations. Exhumation of graves must conform to the standards set out in the **Ordinance on Excavations (Ordinance no. 12 of 1980)** (replacing the old Transvaal Ordinance no. 7 of 1925).

Permission must also be gained from the descendants (where known), the National Department of Health, Provincial Department of Health, Premier of the Province and local police. Furthermore, permission must also be gained from the various landowners (i.e. where the graves are located and where they are to be relocated) before exhumation can take place. Human remains can only be handled by a registered undertaker or an institution declared under the **National Health Act (Act 61 of 2003)**.

### 4.2 The National Environmental Management Act

NEMA states that a survey and evaluation of cultural resources must be done in areas where development projects, that will change the face of the environment, will be undertaken. In terms of section 23 of the NEMA the impact of the development on these resources should be determined and proposals for the mitigation thereof be made.

Environmental management should also take the cultural and social needs of people into account. Section 2(4)(a)(iii) of NEMA requires that any disturbance of landscapes and sites that constitute the nation's cultural heritage should be avoided as far as possible and where this is not possible the disturbance should be minimized and remedied.

# 5. METHODOLOGY

#### **5.1** Survey of literature

A survey of literature was undertaken in order to obtain background information regarding the area. Sources consulted in this regard are indicated in the bibliography. The SAHRA database, SAHRIS, was also utilised. Information obtained here is utilised further on and referenced as such.

#### 5.2 Field survey

A basic assessment of the Waterberg mining area was done in 2014 and the site was visited twice during this survey. These visits were respectively for 3 days in September and 1 day in December. This was followed by an HIA in 2016 when the site was visited for a third time. This visit was done in May and the duration thereof was two days. During 2018 it was visited again, as the infrastructure layout plan had changed. This visit was done in May and took 2 days. Later that year, the area was visited again. This survey, which included a basic assessment and HIA, 56 hours to complete. The current study on Harriet's Wish, took another 8 hours.

The survey was conducted according to generally accepted HIA practices and was aimed at locating all possible objects, sites and features of cultural significance in the area of proposed development. One regularly looks a bit wider than the demarcated area, as the surrounding context needs to be taken into consideration. These practices are described in SAHRA's minimum standards (2007) but is based on the basic methodology for doing archaeological surveys as described in various academic text books, such as Joukowsky (1980), Renfrew & Bahn (1991) and Van Vollenhoven (2000).

If required, the location/position of any site was determined by means of a Global Positioning System (GPS)<sup>1</sup>, while photographs were also taken where needed. The survey was undertaken by doing a physical survey via off-road vehicle and on foot and covered as much as possible of the area to be studied (Figure 6).

One of the surveyed areas (B1) had low vegetation growth but a think under footing which affected the horizontal and the vertical archaeological visibility negatively. The other two surveyed areas (B2 and B3) had low to medium vegetation growth and an open under footing which affected the horizontal and the vertical archaeological visibility positively. The current survey area is approximately 15 Ha in size and the survey took 4 hours to complete.

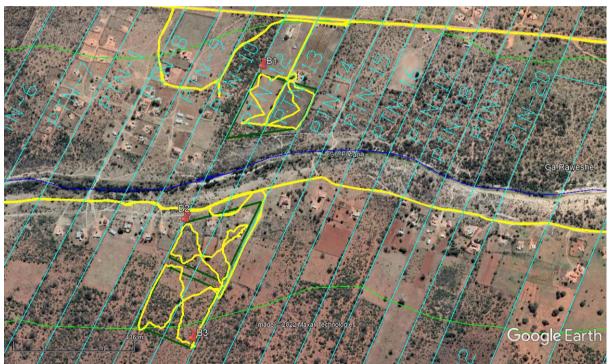


Figure 6: GPS track of the surveyed area. North reference is to the top.

# 5.3 Oral histories

People from local communities are interviewed in order to obtain information relating to the surveyed area. It needs to be stated that this is not applicable under all

<sup>&</sup>lt;sup>1</sup> A Garmin Oregon 550 with an accuracy factor of a few meters.

circumstances. When applicable, the information is included in the text and referred to in the bibliography.

### 5.4 Documentation

All sites, objects, features and structures identified were documented according to the general minimum standards accepted by the archaeological profession. Co-ordinates of individual localities were determined by means of the GPS. The information was added to the description in order to facilitate the identification of each locality.

**5.5** Evaluation of Heritage sites

The evaluation of heritage sites is done by giving a field rating of each (see Appendix C) using the following criteria:

- The unique nature of a site
- The integrity of the archaeological deposit
- 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 or is known)
- The preservation condition of the site
- Uniqueness of the site and
- Potential to answer present research questions.

### 6. DESCRIPTION OF THE AREA

All the surveyed area has been disturbed in the resent past by farming activities and dirt roads, the general environmental characteristics of these area are similar (Figure 7). The surveyed area B1 is located on two fenced off plots of land. On the eastern side, the area is covered by low growing grass and had a thick under footing. On the western side of the area there is a goat pen and it is currently used as grazing land (Figure 8-9).

Surveyed area B2 is largely used as animal grazing land. A house and animal kraal are located to the north and center of the surveyed area. The vegetation is low to medium in height with an open under footing (Figure 10).

Surveyed area B3 is also used as animal grazing land. The vegetation is low to medium in height with and open under footing (Figure 11).

The topography of the surveyed areas is reasonably even. A non-perennial river is located between surveyed areas B1 and B2.



Figure 7: General view of vegetation growth in surveyed areas.



Figure 8: View of grass growth in area B1.



Figure 9: View of goat pen and grazing area in area B1.



Figure 10: View of animal kraal in area B2.



Figure 11: View of vegetation growth and over grazing in area B3.

# 7. HISTORICAL CONTEXT

Thirty sites of cultural heritage significance were identified during previous surveys in the vicinity. None of the are on the farm Harriet's Wish. Two sites were identified on Harriet's Wish during the current t survey, but these are on Portion 3 and not on portions 12 and 13.

A few heritage reports of the surrounding area were found on the SAHRA database as well as the database of Archaetnos (see reference list – Nel, Pelser and Van Vollenhoven). Some of these were desktop studies, which did not provide specific information on the study area, but rather about the broader geographical environment. Many sites are also known from the surrounding environment of the surveyed area (Archaetnos database).

A few scholars (see reference list) also did archaeological research in the area. Unfortunately, some of these reports are not accessible, although indicated on the SAHRIS system of SAHRA (SAHRIS database). Much of the information was however captured by Nel and Van Vollenhoven.

In order to place this within context and to understand possible finds that could be unearthed during construction activities, it is necessary to give a background regarding the different phases of human history in the area. It also needs to be noted that the Makgabeng Plateau is seen as being a very sensitive heritage area. However, the mining impact is limited to the plains east of the plateau. Therefore, only mention will be made of sites on the plateau.

# 7.1 Stone Age

The Stone Age is the period in human history when lithic material was mainly used to produce tools (Coertze & Coertze 1996: 293). In South Africa the Stone Age can be

divided in three periods. It is however important to note that dates are relative and only provide a broad framework for interpretation. The division for the Stone Age according to Korsman & Meyer (1999) is as follows:

Early Stone Age (ESA) 2 million – 150 000 years ago Middle Stone Age (MSA) 150 000 – 30 000 years ago Late Stone Age (LSA) 40 000 years ago – 1850 - A.D.

Many Stone Age sites have been identified previously in the Limpopo Province. Sites dated to the Early Stone Age were identified at Blaauwbank close to Rooiberg, at the Cave of hearths and Schoonheid close to Mokopane, at Olieboompoort to the north of Thabazimbi and at Kalkbank to the south of Schoemansdal (Bergh 1999: 4).

Middle Stone Age sites are known at Tuinplaats to the east of Bela-Bela, at Olieboompoort to the north of Thabazimbi, at the Cave of Hearths and Rufus Cave close to Mokopane, at Grace Dieu and Mwulu Cave close to Polokwane, at Kalkbank to the south of Schoemansdal and at Noord-Brabant and Goergap to the east of Lephalale (Bergh 1999: 4). One Middle Stone Age site is known from the farm Mont Blanc, close to the surveyed area (Sadr 2005).

Late Stone Age sites have been identified at Wellington Estates to the east of Settlers, at Modimolle, at Olieboompoort to the north of Thabazimbi, at the Cave of Hearths close to Mokopane, at Noord-Brabant close to Lephalale, at Kalkbank to the south of Schoemansdal and in the Greefswald area. Closer to the surveyed area only one Late Stone Age site is known. It is called the Makgabeng site close to Blouberg (Bergh 1999: 4).

Rock art is also associated with the Late Stone Age. Such sites were found in abundance in the Limpopo Province. Rock paintings are located along the Limpopo River, the Soutpansberg, Waterberg, Strydpoortberg and the areas in between these. Rock engravings were found along the Mogalakwena and Limpopo Rivers, and between the Olifants and Steelpoort Rivers (Bergh 1999: 4). This includes the study area.

It is clear that the mentioned sites were identified in rural areas and therefore there is a good chance of finding Stone Age sites in this environment, especially close to rivers and mountains. These natural features create an environment suitable for human habitation.

At least one Middle Stone Age site was identified in close proximity to the project area (Nel et.al 2013: 43-44). Nel et.al. (2013: 20-27) also indicates the Late Stone Age existence in the more immediate vicinity of the project area. They mention that more than 460 rock art sites have been documented in this region. However, Eastwood and Tlouamma (2006:9) indicates that they documented more than 670 sites in the region. This includes San rock art as well as finger paintings associated with the Khoi. Rock paintings were noted on the plateau by Van Essen (2018), one of the specialists who did a bio-diversity study on the plateau (Figure 12-13).



Figure 12: Rock painting found on the Makgabeng plateau. These are likely associated with San people (courtesy of LD van Essen).



Figure 13: Rock paintings in a rock shelter on the plateau. These are probably related to Iron Age people (courtesy of LD van Essen).

Late Stone Age sites on the Makgabeng Plateau was also researched and described by Bradfield et.al. (2009: 176-183). They indicate that research has been done in the past here by Roberts (1916), Mason (1962) and Sampson (1974). Bradfield excavated a specific shelter called Mphekwane.

Although no such sites were identified during the survey, it is clear from the above mentioned that Stone Age people did utilize and settled in the broader geographical area. There however are some hiatuses due to certain farms not having been researched before. One will therefore have to be careful during mining that sites are not disturbed. These are however to expected against and on top of the Makgabeng Plateau which is adjacent to the area of impact.

Things to be on the lookout for would be caves, rock shelters, rock outcrops and areas with scattered stone tools in the open, especially close to rivers. This environment is found on the western sections of the farms Early Dawn and Ketting.

Stone tools can be recognized by it showing definite sharp edges as well as cut and hammering marks, which would distinguish it from ordinary stones (Figure 14-16). Rock paintings may also be found in caves and rock shelters whereas large stones in the open may contain rock engravings (Figure 17-19).



Figure 14: Example of an Early Stone Age tool found in Gauteng (Archaetnos' database).



Figure 15: An example of Early Stone Age (top) and a Middle Stone Age tool (bottom) from Archaetnos' collection (Archaetnos' database).



Figure 16: Examples of Late Stone Age tools from Archaetnos' collection (Archaetnos' database).



Figure 17: Rock paintings from the Limpopo Province (Archaetnos' database).



Figure 18: Rock engraving (pecking) from Beeshoek in the Northern Cape (Archaetnos' database).



Figure 19: Rock engravings from Putsonderwater, Northern Cape (Archaetnos database).

### 7.2 Iron Age

The Iron Age is the name given to the period of human history when metal was mainly used to produce metal artifacts (Coertze & Coertze 1996:346). In South Africa it can be divided in two separate phases according to Van der Ryst & Meyer (1999: 96-98), namely:

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

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

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

Very few Early Iron Age sites have been identified. In Limpopo Province these include sites at Kommando Kop, Pont Drift, Mapungubwe and Schroda in the Limpopo Valley. Other sites are Happy Rest/ Matakoma close to Schoemansdal, Klein Afrika to the north of Louis Trichardt, the Eiland site along the upper Letaba River, Silver Leaves close to Tzaneen, at Harmonie to the south of Leydsdorp and at Diamant to the north of Thabazimbi (Bergh 1999: 6). Sites were also identified close to Burgersfort and Hoedspruit (Archaetnos database). No Early Iron Age sites are indicated in a historical atlas (Bergh 1999) close to the surveyed area.

Middle Iron Age sites include the World Heritage site at Mapungubwe as well as K2, Kommandokop and Schroda in the Limpopo Valley (Bergh 1999: 7). No Middle Iron Age sites are indicated in a historical atlas (Bergh 1999) close to the surveyed area.

Late Iron Age sites are found in abundance throughout the Limpopo Province. Pelser (2011: 11) indicate that many such sites exist close to Alldays but does not provide any details. Known sites include those along the Sand and Levuvhu Rivers, various sites in the Kruger National Park (including Thulamela, Makahane and others), at least 58 sites near the town of Phalaborwa, 200 sites along the Lephalala River, 35 sites to the south of Polokwane, 42 sites to the east of Mokopane, 13 smelting sites in the Strydpoort Mountains and 63 sites between Thabazimbi and Rooiberg (Bergh 1999: 7). None of these are in the surveyed area.

Specific sites relating to archaeo-metallurgy were also identified. Sites where copper smelting were identified include some to the west and south of Musina, to the north and west of Phalaborwa (including Lolwe), sites to the south of Leydsdorp, between Tzaneen and Polokwane, along the Hout River and close to Modimolle. Sites where iron were worked include those at Tshimbupfe to the east of Louis Trichardt, sites around Phalaborwa, sites between Polokwane and Tzaneen, to the north and east of Modimolle and to the east of Thabazimbi. Signs of gold working were only found at four sites namely Mapungubwe, Machemma, Makahane and Thulamela. Tin workings were identified at Blaauwbank and Rooiberg in the south-west of the province (Bergh 1999: 8). More sites known are sites on the farm Icon, Matoks, Manavela, Tavhatshena and the farm Stayt (Archaetnos database). Van Schalkwyk also indicated that iron was worked at a site on the farm Millbank (Bradfield et.al. 2009: 180).

The lack of known sites in the Study Area is merely an indication that these have not been surveyed in the recent past. Therefore, chances are good that Iron Age material and sites will be identified on some of these farms. Early Iron Age sites are usually found close to rivers. During a very recent survey such sites were indeed identified on the southern side of Blouberg and the northern side of the Makgabeng Plateau. Mention is made of a number of Early Iron Age sites on farms in and close to the project area (Nel et.al. 2013: 20-23).

During the mentioned recent survey, in close proximity to the project area, Nel et.al. (2013: 20-29, 35-40, 44-46) did identify Late Iron Age sites. They also mention rock art sites, known as finger paintings, associated with Northern Sotho speaking farming communities of the Late Iron Age. These were studied by Smith & Van Schalkwyk 2002: 235-254) who indicated that a specific painting of a camel can be dated to the early 20<sup>th</sup> century.

Van Schalkwyk indicated that Iron Age farmers moved into the area during the 13<sup>th</sup> century. He also did some excavations on the farm Millbank on a 16<sup>th</sup> and 17<sup>th</sup> century LIA village (Bradfield et.al. 2009: 176).

Late Iron Age sites are normally found on the foot or against slopes of hills. These sites can be identified by extensive stone walled complexes that served as homesteads and cattle kraals (Figure 20). Sometimes these sites can be identified by

only a few potsherds (Figure 21). The lack of known sites closer to the project area may only indicate that no research has been done in this area. During the mentioned recent survey in close proximity to the project area, Nel et.al. (2013: 20-29, 35-40, 44-46) did identify Late Iron Age sites. They also mention rock art sites, known as finger paintings, associated with Sotho speaking farming communities of the Late Iron Age.



Figure 20: Typical Late Iron Age stone walling (Archaetnos' database).



Figure 21: Typical Iron Age pottery (Archaetnos' database).

Although no such site was identified during the current survey, the environment is definitely suitable therefore one should be cautious. Caution should especially be taken when working in the areas close to mountains (against slopes, in saddles or on top) and rivers. On Goedetrouw some Iron Age remains were also noted (Van Vollenhoven 2015b).

On the farm Ketting a few sites have been identified by one of the project geologists. It includes seven Late Iron Age sites and one cave with pottery and other remains (Figure 22-25). The biodiversity specialist made mention of similar sites (Figure 26-27). These sites are important, and one will have to conduct further studies, especially on the cave site. These sites are however far away from the proposed infrastructure development on site.

The strategic position of some of these sites indicates that the sites were utilized during times of turmoil, e.g. the Difaquane or the wars against the former Boer republic of the ZAR. This would place it within the historical era (see below), but the characteristics of the sites are similar to that of Late Iron Age sites.



Figure 22: Late Iron Age walling on the farm Ketting (courtesy of Geoactive Dynamic Geological Services).



Figure 23: Late Iron Age terraces on Ketting (courtesy of Geoactive Dynamic Geological Services).



Figure 24: Low stone wall in front of a cave with Iron Age remains inside (courtesy of Geoactive Dynamic Geological Services).



Figure 25: Ceramic pots found inside of the cave (courtesy of Geoactive Dynamic Geological Services).



Figure 26: Iron Age feature at cave entrance (courtesy of LD van Essen).



Figure 27: Iron Age pottery at a rock shelter on the Makgabeng Plateau.

### 7.3 Historical Age

The historical age started with the first recorded oral histories in the area. It includes the moving into the area of people that were able to read and write. This era is sometimes called the Colonial era or the recent past. Due to factors such as population growth and a decrease in mortality rates, more people inhabited the area during the recent historical past. Therefore, much more cultural heritage resources have been left on the landscape. It is important to note that all cultural resources older than 60 years are potentially regarded as part of the heritage and that detailed studies are needed in order to determine whether these indeed have cultural significance.

It is known that some of the early trade routes went past the Study Area, to the east thereof (Bergh 1999: 9). At the beginning of the 19<sup>th</sup> century different indigenous groups resided here. To the north it was the Hananwa who entered circa 1820/30 and to the south the Koni of Matlala, the Moletse/Kwena and the Langa Ndebele (Bergh 1999: 10). The Hananwa are the present occupiers of the area (Bradfield et.al.2009: 179).

The only early white traveller who visited this area was Coenraad de Buys in 1821 and 1825. In fact, he settled here (Bergh 1999: 12-13). The Voortrekkers under leadership of Louis Tregard also moved through this area in 1836 (Bergh 199: 14).

White farmers settled in the Soutpansberg area during the 1840's and established the town of Schoemansdal (Bergh 1999: 14). They never settled further to the west in the project area. The white farmers were followed by the Berlin Missionaries and later other missionaries (Nel et.al. 2013: 21; Bergh 1999: 57).

In 1894 a war broke out between the Boers and the Hananwa in the Blouberg area. This was known as the Maleboch War. During the War several fortifications were erected of which some are still to be seen today (Van Schalkwyk & Moifatswane 1991: 1-17; Smith & Van Schalkwyk 2002: 237; Nel et.al. 2013: 21-22; Bergh 1999: 36). This lies just to the north of the surveyed area. Late Iron Age/ Historical stone walled sites, linked to this period, have also been identified close to the project area (Nel et.al. 2013:31-34, 41-43). The Historical/ Late Iron Age sites identified on Ketting (see above) may also date from this period in time.

It seems as if many of the farms surveyed were only used for grazing by white farmers. By 1904 the area was however allocated to different indigenous groups (Bergh 1999: 41). It later on became part of the so-called Lebowa State (Bergh 1999: 43).

It therefore is clear that one would rather expect recent historical structures in the area than older or even prehistoric features. According to legislation everything older than 60 years can potentially be deemed as of heritage value, although one has to also consider other factors, such as uniqueness and state of the site. It would be impossible to list every heritage site older than 60 years. Sites, features and structures that are known from nearby the surveyed area are nevertheless listed below:

- Schoemansdal Voortrekker town and graveyard (Stoffberg 1988);
- ZAR fortifications at Blouberg;
- Mission stations, including Phatametsane, Khalatlolu, Bethesda, Malokong, Blauberg, Medingen, Mp'hôme, Kranspoort, Georgenholtz, Ha Schewasse, Tshakoma and Valdezia;
- Battlefields from the Anglo-Boer War (1899-1902) including Fort Edward close to Louis Trichardt, Fort Klipdam and Pietersburg to the north of Polokwane and Houtboschberg to the east of Polokwane;
- The place where Louis Tregardt met Portuguese Askari's and site of the State Artillery in Louis Trichardt (Oberholster 1972; Bergh 1999).

Declared national heritage sites include the following:

- Fort Hendrina in Louis Trichardt;
- The first ore stamper for gold on the farm Eersteling close to Polokwane;
- The Louis Tregardt monument north of Polokwane;
- Schoemansdal, mentioned earlier;
- Stonehenge, a residential farm house on the farm Bergvliet close to the Soutpansberg;
- The trek route of Louis Tregardt (Oberholster 1972; Bergh 1999);
- Fort Klipdam north of Polokwane, mentioned above (Oberholster 1972; SAHRA database; Bergh 1999).

One may therefore expect to find buildings and structures of a similar age (i.e. mid-19<sup>th</sup> century) on the farms within the Study Area. This is likely to coincide with the missionaries or structures built by farmers. It however seems as if these farms were scarcely inhabited by white farmers and rather used as grazing land.

Sites found will undoubtedly include graves. In fact, grave sites have been identified on adjacent farms during previous survey (Net et.al. 2013: 26, 29-30, 34-35, 41; Van

Vollenhoven & Collins 2014; Van Vollenhoven 2015a; Van Vollenhoven 2016). Other historical sites were also identified during the latter surveys (Van Vollenhoven 2015a; Van Vollenhoven 2016).

# 8. DISCUSSION OF SITES IDENTIFIED DURING THE SURVEY

As indicated, thirty sites of cultural importance were identified in the surrounding area in the past (Figure 28). None of these are close to the development area. Two additional sites have been identified on Harriet's Wish, but these are on Portion 3 and not the two portions (12 and 13) applicable to this study (Figure 29).

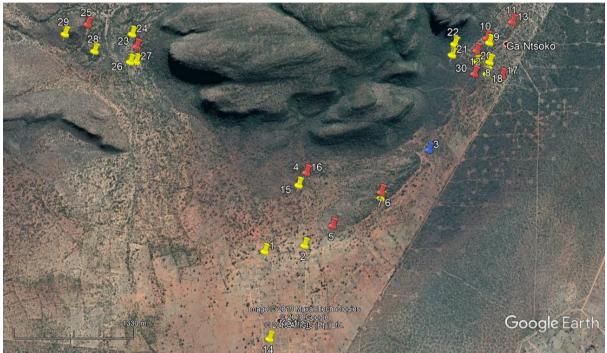


Figure 28: Sites identified close to (north) of the current study area.

- a. Yellow graves
- b. Red historical
- c. Blue Iron Age



Figure 29: Two sites identified on Portion 3 of Harriet's Wish.

### 9. CONCLUSION AND RECOMMENDATIONS

The survey of the Study Area was completed successfully. No sites of cultural importance were identified in the study area.

The following is recommended:

- This report is seen as ample mitigation.
- The project may continue, but only after receiving the necessary comments from SAHRA as well as the implementation of the mitigation measures indicated below.
- It should always be noted that the subterranean presence of archaeological and/or historical sites, features or artefacts is always a distinct possibility. Care should therefore be taken when development commences that if any of these are discovered, a qualified archaeologist be called in to investigate the occurrence.

#### **10.REFERENCES**

Archaetnos' database.

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

- Bradfield, J., Holt, S. & Sadr, K. 2009. The last of the LSA on the Makgabeng Plateau, Limpopo Province. **South African Archaeological Bulletin**. 64 (190), pp. 176-183.
- Coertze, P.J. & Coertze, R.D. 1996. Verklarende vakwoordeboek vir Antropologie en Argeologie. Pretoria: R.D. Coertze.
- Daniel, S. 2015. Old kraals and a cave found in the hills on the Waterberg Project. (Unpublished report, Johannesburg, GeoActiv Dynamic Geological Services).
- Huffman, T.N. 2007. Handbook to the Iron Age: The Archaeology of Pre-Colonial Farming Societies in Southern Africa. Scotsville: University of KwaZulu-Natal Press.
- Eastwood, E, and Tlouamma, J. 2006. The Makgabeng Plateau rock art survey five years on. **The Digging Stick** 23 (1), pp. 9-11.
- International Finance Corporation. 2012. Overview of performance standards on Environmental and Social Sustainability. Performance Standard 8, Cultural Heritage. World Bank Group.
- Joukowsky, M. 1980. A complete manual of Field Archaeology. New Jersey: Prentice-Hall Inc.
- Knudson, S.J. 1978. **Culture in retrospect.** Chicago: Rand McNally College Publishing Company.
- Korsman, S.A. & Meyer, A. 1999. Die Steentydperk en rotskuns. Bergh, J.S. (red.). Geskiedenisatlas van Suid-Afrika. Die vier noordelike provinsies. Pretoria: J.L. van Schaik.
- Nel, J., Du Piesanie, J. & Karodia, S. 2013. Heritage Statement for the Waterberg Prospecting Rights Application, Blouberg, Limpopo Province.
  - (Unpublished report, Randburg, Digby Wells Environmental).
- Oberholster, J.J., 1972. The historical monuments of South Africa. Cape Town: C. Struik (Pty.) Ltd.
- Pelser, A.J. 2011. A desktop heritage assessment study for a prospecting rights application on various farms near Alldays in the Musina and Blouberg Magisterial Districts, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).
- Renfrew, C. & Bahn, P. 1991. Archaeology: Theories, Methods and Practice. London: Thames and Hudson Ltd.
- Republic of South Africa. 1980. **Ordinance on** Exhumations (Ordinance no. 12 of 1980). The Government Printer: Pretoria.
- Republic of South Africa. 2003. **National Health Act** (No 61 of 2003). The Government Printer: Pretoria.
- Republic of South Africa. 1999. **National Heritage Resources Act** (No 25 of 1999). Pretoria: the Government Printer.
- Republic of South Africa. 1998. **National Environmental Management Act** (no 107 of 1998). Pretoria: The Government Printer.
- SAHRA database.
- SAHRA, 2012. Minumum standards: Archaeological and Palaeontological components of Impact Assessment Reports.
- Sadr, K. 2005. **Mphekwane test excavation of site MB5 (Mont Blanc)**. (Unpublished report, WITS University).

- Smith, B.W. & Van Schalkwyk, J.A. 2002. The white camel of the Makgabeng. **Journal** of African History. 43, pp. 235-254.
- Stoffberg, D.P. 1988. Argeologiese opgrawings van die Schoemansdalse Voortrekkerskans (distrik Louis Trichardt). Pretoria: Etnologiese diens, SA Leërhoofkwartier.
- Van der Ryst, M.M. & Meyer, A. 1999. Die Ystertydperk. Bergh, J.S. (red.). Geskiedenisatlas van Suid-Afrika. Die vier noordelike provinsies. Pretoria: J.L. van Schaik.
- Van Schalkwyk, J.A. & Moifatswane, S.M. 1991. The siege of Leboho: South African Republic Fortifications in the Blouberg, Northern Transvaal. **Military History Journal**. 8(5), pp.1-17.
- Van Vollenhoven, A.C. 2000. 'n Voorgestelde paradigma vir navorsing op histories-argeologiese erfenishulpbronterreine in Suid-Afrika aan die hand van gevallestudies in noordelike Gauteng.(Unpublished DPhil thesis, Pretoria, University of Pretoria).
- Van Vollenhoven, A.C. 2013a. Report on a desktop study with regards to the cultural heritage relating to a prospecting right application for project LP 30/5/1/1/2/10806 in the Waterberg District, Limpopo Province. (Unpublished report, Wonderboompoort, Archaetnos).
- Van Vollenhoven, A.C. 2013b. Report on a desktop study with regards to the cultural heritage relating to a prospecting right application for project LP 30/5/1/1/2/11286 in the Waterberg District, Limpopo Province. (Unpublished report, Wonderboompoort, Archaetnos).
- Van Vollenhoven, A.C. 2014. A report on an archaeological impact assessment related to the construction of a road for the Platinum Group Metals Waterberg Prospecting Area, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).
- Van Vollenhoven, A.C. 2015a. A report on a baseline cultural heritage assessment done for the Platinum Group Metals Waterberg Prospecting Area, on the farms Langbryde 324 IR, Nieuwe Jerusalem 327 IR, Mont Blanc 328 IR, Groenepunt 354 IR, Bonne Esperance 356 IR, Rosamond 357 IR, Millstream 358 IR, Too Late 359 IR and Old Langsine 360 IR, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).
- Van Vollenhoven, A.C. 2015b. A report on a basic cultural heritage assessment for the proposed ESKOM Goedetrouw and Ketting substations and 132kV lines project, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).
- Van Vollenhoven, A.C. 2016. A report on a cultural heritage impact assessment done for the Platinum Group Metals Waterberg Prospecting Area, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).
- Van Vollenhoven, A.C 2018a. A report on an additional cultural heritage impact assessment done for the Platinum Group Metals Waterberg Prospecting Area, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).
- Van Vollenhoven, A.C. 2018b. A report on an additional cultural heritage impact assessment on the farm Ketting 368 LR and the farm Disseldorp 369 LR, done for the Platinum Group Metals Waterberg Prospecting Area, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).

Van Vollenhoven, A.C. & Collins, Z. 2014. A report on a baseline cultural heritage assessment done for the Platinum Group Metals Waterberg Prospecting Area, Limpopo Province. (Unpublished report, Groenkloof, Archaetnos).

### **APPENDIX A**

### **DEFINITION OF TERMS:**

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

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

Feature: A coincidental find of movable cultural objects.

Object: Artifact (cultural object).

(Also see Knudson 1978: 20).

### APPENDIX B

### **DEFINITION/ STATEMENT OF HERITAGE SIGNIFICANCE:**

- Historic value: Important in the community or pattern of history or has an association with the life or work of a person, group or organization of importance in history.
- Aesthetic value: Important in exhibiting particular aesthetic characteristics valued by a community or cultural group.
- Scientific value: Potential to yield information that will contribute to an understanding of natural or cultural history or is important in demonstrating a high degree of creative or technical achievement of a particular period
- Social value: Have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.
- Rarity: Does it possess uncommon, rare or endangered aspects of natural or cultural heritage.
- Representivity: Important in demonstrating the principal characteristics of a particular class of natural or cultural places or object or a range of landscapes or environments characteristic of its class or of human activities (including way of life, philosophy, custom, process, land-use, function, design or technique) in the environment of the nation, province region or locality.

# APPENDIX C

### SIGNIFICANCE AND FIELD RATING:

#### Cultural significance:

- Negligible The site has no heritage significance, although it may be older than 60 years.
- Low A cultural object being found out of context, not being part of a site or without any related feature/structure in its surroundings. A site with minimal importance which is decreased by its bad state of decay.
- Low-Medium A site of lesser importance, which is increased by a good state of preservation and contextual importance (e.g. a specific community).
- Medium Any site, structure or feature being regarded less important due to a number of factors, such as date and frequency. Also, any important object found out of context.
- Medium-High A site that has high importance due to its age or uniqueness, but which decreases due to its bad state of decay.
- High Any site, structure or feature regarded as important because of its age or uniqueness. Also, any important object found within a specific context.
- Very High A site of exceptional importance due to its age, uniqueness and good state of preservation.

#### Heritage significance:

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

#### Field ratings:

National Grade I significance: The site should be managed as part of the national estate, should be nominated as Grad I site, should be maintained in situ with a protected buffer zone and a CMP must be recommended. Score above 50.

Provincial Grade II significance: The site should be managed as part of the provincial estate, should be nominated as Grade II site, should be maintained in situ with a protected buffer zone and a CMP must be recommended. Score between 41 and 50.

Local Grade IIIA: The site should be included in the heritage register and not be mitigated (high significance), should be maintained in situ with a protected buffer zone and a CMP must be recommended. Score between 31 and 40.

Local Grade IIIB: The site should be included in the heritage register and may be mitigated (high/ medium significance). Mitigation is subject to a permit application lodged with the relevant heritage authority. Score between 6 and 30.

Local Grade IIIC: The description in the phase 1 heritage report is seen as sufficient recording (low significance) and it may be granted destruction at the discretion of the relevant heritage authority without a formal permit application, subjected to the granting of Environmental Authorisation. Score below 5.

# APPENDIX D

### **PROTECTION OF HERITAGE RESOURCES:**

#### Formal protection:

National heritage sites and Provincial heritage sites – grade I and II Protected areas - an area surrounding a heritage site Provisional protection – for a maximum period of two years Heritage registers – listing grades II and III Heritage areas – areas with more than one heritage site included Heritage objects – e.g. archaeological, palaeontological, meteorites, geological specimens, visual art, military, numismatic, books, etc.

#### General protection:

Objects protected by the laws of foreign states Structures – older than 60 years Archaeology, palaeontology and meteorites Burial grounds and graves Public monuments and memorials

# APPENDIX E

### HERITAGE IMPACT ASSESSMENT PHASES

- 1. Pre-assessment or scoping phase establishment of the scope of the project and terms of reference.
- 2. Baseline assessment establishment of a broad framework of the potential heritage of an area.
- 3. Phase I impact assessment identifying sites, assess their significance, make comments on the impact of the development and makes recommendations for mitigation or conservation.
- 4. Letter of recommendation for exemption if there is no likelihood that any sites will be impacted.
- 5. Phase II mitigation or rescue planning for the protection of significant sites or sampling through excavation or collection (after receiving a permit) of sites that may be lost.
- 6. Phase III management plan for rare cases where sites are so important that development cannot be allowed.