Archaetnos Culture & Cultural
Resource Consultants
BK 98 09854/23

A REPORT ON A CULTURAL HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT AT TRANSALLOYS ON PORTIONS 34 AND 35 (PORTION OF PORTION 34) OF THE FARM ELANDSFONTEIN 309 JS AND PORTIONS 20 AND 24 OF THE FARM SCHOONGEZICHT 308 JS, CLOSE TO EMALAHLENI, MPUMALANGA PROVINCE

For:

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REPORT NO.: AE01413V

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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 are 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.

SUMMARY

Archaetnos cc was requested by HydroScience to conduct a cultural heritage impact assessment (HIA) for a proposed development for Transalloys on portions 34 and 35 (portion of portion 34) of the farm Elandsfontein 309 JS and portions 20 and 24 of the farm Schoongezicht 308 JS. This is close to the town of Emalahleni in the Mpumalanga Province.

A survey of the available literature was undertaken in order to obtain background information regarding the proposed project area and the surrounding environment. This was followed by the field survey which was conducted according to generally accepted HIA practices, aimed at locating all possible objects, sites and features of cultural significance in the project area.

During the HIA survey one site of cultural heritage significance was identified. The necessary mitigation measures are proposed. After implementation of these, the proposed development may continue.

It should be noted, however, that the subterranean presence of archaeological and/or historical sites, features or artifacts is always a possibility. As such, care should be taken when the construction phase of the project commences. If any historical sites, features or artifacts are discovered, a qualified archaeologist should be commissioned to investigate.

It is also important to take cognisance of the applicant's responsibility to submit this report via the SAHRIS System on the South African Heritage Resource Agency (SAHRA) website. No work on site may commence before receiving the necessary comments from the SAHRA.

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1. INTRODUCTION

Archaetnos cc was requested by HydroScience to conduct a cultural heritage impact assessment (HIA) for a proposed development for Transalloys on portions 34 and 35 (portion of portion 34) of the farm Elandsfontein 309 JS and portions 20 and 24 of the farm Schoongezicht 308 JS. This is close to the town of Emalahleni in the Mpumalanga Province (Figures 1-2).

The development entails the building of two pollution control dams. However, a much larger area was investigated in order to assist with future planning at the plant.

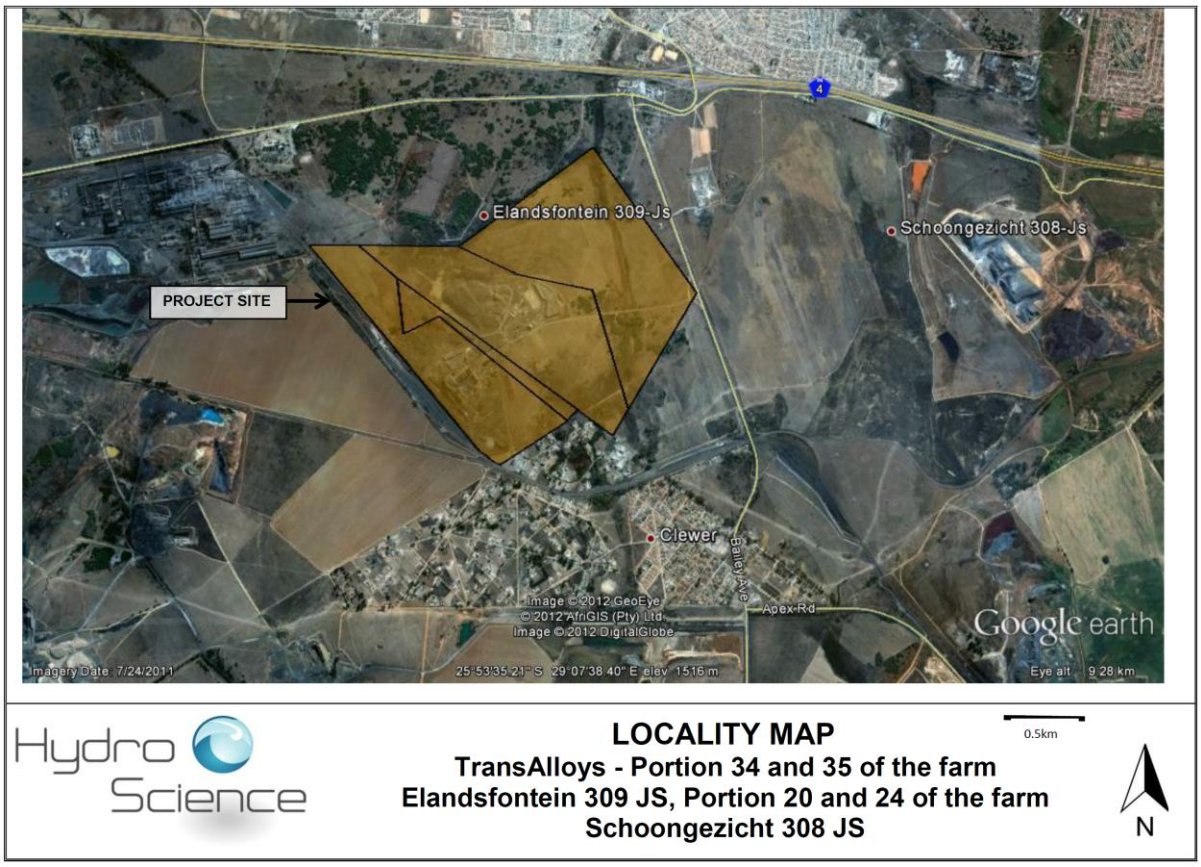

Figure 1: Location of the Project site in Mpumalanga.

Figure 2: Boundary of the project site.

2. TERMS OF REFERENCE

The Terms of Reference for the survey were to:

1. Identify objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located on the property (see Appendix A);

2. Study background information on the site to be developed;

3. Assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value (see Appendix B);

4. Describe the potential impact of the Proposed Project on cultural remains, according to a standard set of conventions;

5. Recommend suitable mitigation measures to minimise potential negative impacts on the cultural resources; and

6. Review applicable legislative requirements.

3. LEGISLATIVE REQUIREMENTS

Aspects concerning the conservation of cultural resources are dealt with primarily through two Acts, namely the National Heritage Resources Act (Act 25 of 1999) and the National Environmental Management Act (Act 107 of 1998).

3.1 The National Heritage Resources Act

According to the National Heritage Resources Act (NHRA) the following are considered protected as 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; and
i. Objects, structures and sites or 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; and
i. Movable objects (e.g. archaeological, paleontological, meteorites, geological specimens, military, ethnographic, books etc.).

A HIA is the process to be followed in order to determine whether any heritage resources are located within the area proposed for development as well as the potential impact of the proposed development thereon. An Archaeological Impact Assessment only looks at archaeological resources. The different phases of the HIA process are described further in Appendix E. An HIA should be undertaken under the following circumstances:

a. The construction of a linear development (road, wall, power line canal etc.) exceeding 300m in length;
b. The construction of a bridge or similar structure exceeding 50m in length;
c. Any development or other activity that will change the character of a site and exceed 5 000m^2 or involve three or more existing erven or subdivisions thereof;

d. Re-zoning of a site exceeding 10 000 m^2; and
e. Any other category provided for in the regulations of South African Heritage Resource Agency (SAHRA) or a provincial heritage authority.

Structures

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

The act defines a structure as 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.

According to the act 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 NHRA 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;
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; and/or
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 a registered archaeologist, after receiving a permit from the SAHRA. In order to demolish such a site or structure, a destruction permit from SAHRA is required.

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; and
f. Human remains.

In terms of Section 36(3) of the NHRA, no person may, without a permit issued by the SAHRA:

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; and/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.

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 Human Tissue Act (Act 65 of 1983) (HTA) 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 **HTA**.

3.2 The National Environmental Management Act

The National Environmental Management Act (Act 107 of 1998) states that a survey and evaluation of cultural resources must be done in areas where development projects, that will change the face of the environment, will be undertaken. The impact of the development on these resources should be determined and proposals for the mitigation thereof are made.

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

4. THE INTERNATIONAL FINANCE CORPORATIONS' PERFORMANCE STANDARD FOR CULTURAL HERITAGE

This standard recognizes the importance of cultural heritage for current and future generations. It aims to ensure that clients protect cultural heritage in the course of their project activities.

This is done by clients abiding to the law and having heritage surveys done in order to identify and protect cultural heritage resources via field studies and the documentation of such resources. These need to be done by competent professionals (e.g. archaeologists and cultural historians). Possible chance finds, encountered during the project development, also needs to be managed by not disturbing it and by having it assessed by professionals.

Impacts on the cultural heritage should be minimized. This includes the possible maintenance of such sites in situ, or when impossible, the restoration of the functionality of the cultural heritage in a different location. When cultural, historical and archaeological artifacts and structures need to be removed it should be done by professionals and by abiding to the applicable legislation. The removal of cultural heritage resources may however, only be considered if there are no technically or financially feasible alternatives. In considering the removal of cultural resources, it should be outweighed by the benefits of the overall project to the effected communities. Again professionals should carry out the work and adhere to the best available techniques.

It is necessary to engage into consultation with affected communities. This entails that access to such communities, should be granted to their cultural heritage if this is applicable. Compensation for the loss of cultural heritage should only be given in extra-ordinary circumstances.

Critical cultural heritage may not be impacted on. Professionals should be used to advise on the assessment and protection thereof. Utilization of cultural heritage resources should always be done in consultation with the effected communities in order to be consistent with their customs and traditions and to come to agreements with relation to possible equitable sharing of benefits from commercialization.

5. METHODOLOGY

5.1 Survey of literature

A review of literature was undertaken in order to obtain background information regarding the area. Sources consulted in this regard are indicated in the list of references.

5.2 Field survey

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 in which the Project is proposed. Depending on circumstances, one regularly looks at an area which is wider than the demarcated Proposed Project site, as the surrounding context needs to be taken into consideration.

If required, the location/position of any objects, sites and features of cultural significance was determined by means of a Global Positioning System (GPS)[1], while photographs were also taken where needed. The site survey was undertaken by means of an off-road vehicle and on foot (Figure 3). The size of the area surveyed is approximately 233 Ha and took four hours to complete.

Figure 3: GPS track of the surveyed area.

5.3 Oral histories

People from local communities are interviewed in order to obtain information relating to the surveyed area. However, it should be understood that this activity is not required under all circumstances as it only comes to the fore once a specific community is directly involved. When applicable, this information obtained is included in the report write-up and linked to the information sources.

5.4 Documentation

All sites, objects features and structures identified are documented according to the general minimum standards accepted by the archaeological profession. This includes photographic documentation, description of the sites and taking GPS co-ordinates.

[1] A Garmin Oregon 550 with an accuracy factor of between 3 and 5 meters.

5.5 Evaluation of Heritage sites

The evaluation of heritage sites is undertaken by applying a field rating to 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. CONDITIONS AND ASSUMPTIONS

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

1. 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, structures and artifacts of importance, either individually or in groups, in the history, architecture and archaeology of human (cultural) development (including graves and cemeteries).

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 undertaken 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.

5. All recommendations are made with full cognisance of the relevant legislation.

6. It should be noted that it is almost impossible to locate all the cultural resources in a given area during a single project specific survey. Developers

should however, be aware of the fact that this report outlines how to handle any finds which may take place after the commissioning of the site.

7. In this particular case, there are two things to be noted. Firstly, most of the surveyed area has been disturbed by recent human activities which, of course negatively affects the chances of finding sites with heritage value. Secondly, the vegetation cover, either disturbed or undisturbed, was reasonably high and therefore had a negative effect on archaeological visibility.

7. DESCRIPTION OF THE ENVIRONMENT

Almost a third of the project area is covered by the Transalloys plant consisting of buildings, offices, roads, storage areas for ore and other infrastructure (Figures 4-5). At least another third of the property has been disturbed by former mining activities and although it shows natural vegetation, these consist of pioneer species (Figure 6-7). The remainder consists of old agricultural fields and an area used for grazing (Figure 8). The vegetation cover is reasonably high and dense, but as indicated mostly disturbed (Figure 9).

The topography of the area consists of rolling hills (Figure 10). Two rivers cut through the area, one in the north-east and one in the north-east. Along the rivers the vegetation cover is extremely dense.

Figure 4: View of the plant within the surveyed area.

Figure 5: Another view of the plant within the surveyed area.

Figure 6: This section of the surveyed area shows signs of previous mining activities.

Figure 7: View of an area showing disturbance by plantations as well as pioneer plant species.

Figure 8: Another view of the surveyed area indicating old agricultural fields.

Figure 9: General view of the surveyed area showing dense vegetation.

Figure 10: Another view of the surveyed area showing rolling hills.

8. HISTORICAL CONTEXT

During the survey, one site of cultural heritage significance was identified. To place this in context and to understand possible finds that could be unearthed during

construction activities, it is necessary to give background regarding the different phases of human history.

8.1 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 into 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: 93-94) 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.

No Stone Age sites are indicated on a map contained in a historical atlas of this area (Bergh 1999: 4). The closest known Stone Age occurrence is that of rock art close to the Olifants River to the south of Emalahleni (Witbank) (Bergh 1999: 5). This however, should rather be seen as a lack of research in the area and not as an indication that such features do not occur.

However, no natural shelters were seen during the survey and therefore it is possible that these people did not stay here for long times. The close vicinity to water sources of course makes it a prime spot for hunting and obtaining water. Therefore one may assume that Stone Age people probably would have moved through the area. No Stone Age material was found during the survey.

8.2 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 into 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 now seem to be widely accepted in archaeological circles, are:

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

No Iron Age sites have been identified around the town of Witbank, but this may only indicate a lack of research. The good grazing and access to water in the area would have provided a good environment for Iron Age people although building material seems to be reasonably scarce. No Iron Age occurrences were identified during the survey.

8.3 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 country during the recent historical past. Therefore and because less time has passed, much more cultural heritage resources from this era 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. Factors to be considered include aesthetic, scientific, cultural and religious value of such resources.

At the beginning of the 19th century, the Phuthing, a South Sotho group, stayed to the east of Emalahleni. During the Difaquane they fled to the south from the impi of Mzilikazi (Bergh 1999: 10-11; 109).

The first white traveler to visit these surroundings was Robert Scoon in 1836 (Bergh 1999: 13). White farmers only settled here after 1850 (Bergh 1999: 16).

One may therefore expect to find farm buildings, structures and objects from this period in time in the area. Many graveyards from this period have indeed been identified in surrounding areas during past surveys (Archaetnos database). One should therefore be on the lookout for such sites in the surveyed area.

9. DISCUSSION OF SITES IDENTIFIED DURING THE SURVEY

9.1 Site 1 – Grave yard

This is the remains of a very large graveyard containing at least 90 graves (Figure 11). Different types of grave dressing and headstones are found, being cement borders with headstones, heaps of soil, stone packed with or without headstones, granite borders and headstones and heaps of brick. A few are even fenced in.

Surnames identified include Gasibone, Mdlalose, Masilela, Blom and Mokoena. Only eight of the graves have dates of death indicated, with the oldest being 1947 and the youngest 1960. This means that all three of the categories of graves are present being those younger than 60 years, older than 60 years (called heritage graves) and those with an unknown date of death (to be handled as heritage graves).

GPS: 25°53’26.2”S
29°07’39.4”E

Figure 11: The graves at site no. 1.

Due to the sensitivity of this issue, graves are always regarded as having a **high** cultural significance. These graves are of a local significance and are therefore given a field rating of Grade IIIB. It may therefore be mitigated.

There are two options when dealing with graves. The first would be to fence it in and write a management plan for the preservation thereof. This option will come into play if there is no direct impact on the graves. It should be kept in mind that there always is a secondary impact on graves since families may not have access thereto due to operational issues.

The second option is to have the graves exhumed and the bodies reburied. This option is preferred when graves cannot be avoided by the development. In order for exhumation to be allowed by SAHRA, an additional motivation would be needed. Before exhumation can be done a process of social consultation is needed in order to find the associated families and obtain permission from them. For graves younger than 60 years, only an undertaker is involved in the process, but for those older than 60 years or with an unknown date of death, an undertaker and archaeologist should be involved. Unknown graves are handled similarly to heritage graves.

In this case, the graves are far from the planned positions of the pollution control dams. Therefore, no direct impact is foreseen and option 1 is recommended. It means that the site should be left in situ. It should then be fenced in and a conservation management plan for the sustainable preservation and management thereof should be drafted and implemented.

10. CONCLUSION AND RECOMMENDATIONS

As indicated, one site of cultural heritage significance was identified (Figure 12). The survey of the indicated area was completed successfully.

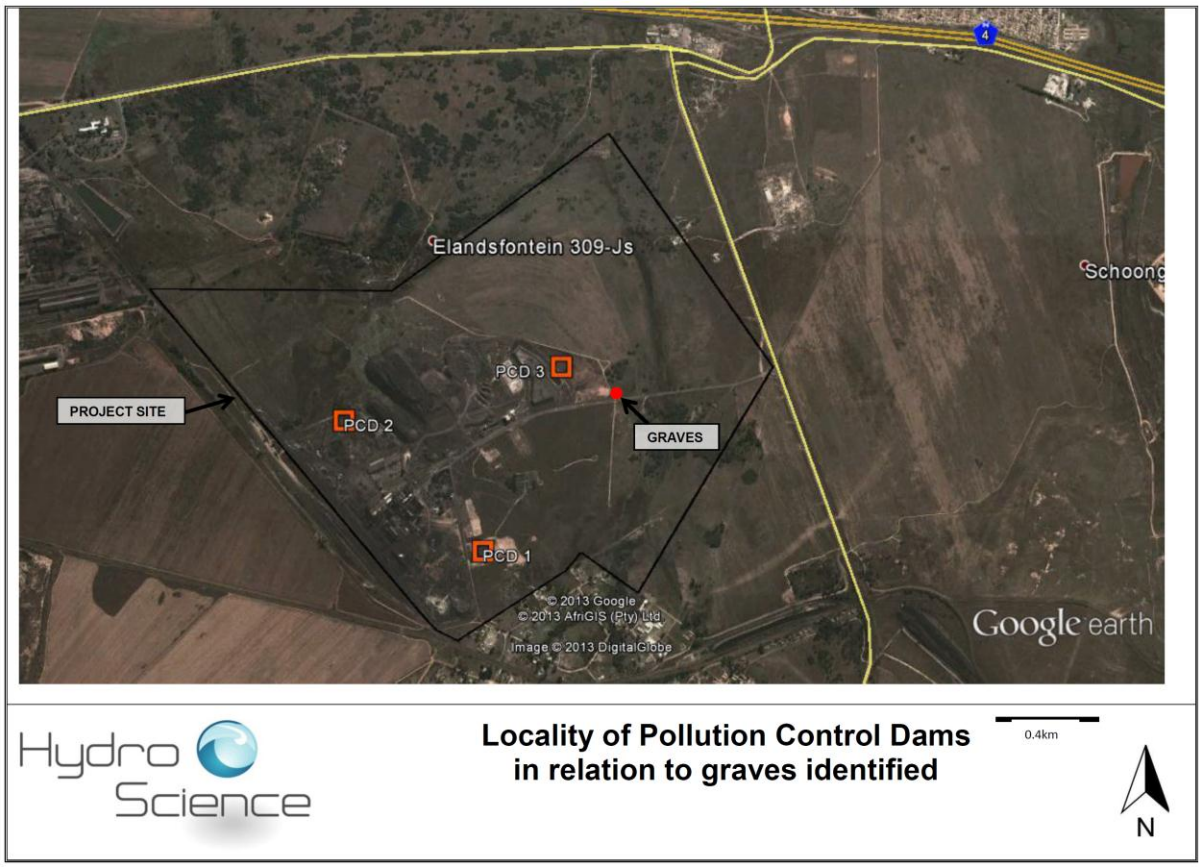

Figure 12: Google image indicating the location of the site identified during the survey.

The following is recommended:

- Only one site, a graveyard, was identified.

- There are two options when dealing with graves. The first would be to fence it in and write a management plan for the preservation thereof. This option will come into play if there is no direct impact on the graves. It should be kept in mind that there always is a secondary impact on graves since families may not have access thereto due to operational issues.

- The second option is to have the graves exhumed and the bodies reburied. This option is preferred when graves cannot be avoided by the development. In order for exhumation to be allowed by SAHRA, an additional motivation would be needed. Before exhumation can be done a process of social consultation is needed in order to find the associated families and obtain

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- In this case the graves are far from the planned positions of the pollution control dams. Therefore no direct impact is foreseen and option 1 is recommended. It means that the site should be left in situ. It should then be fenced in and a conservation management plan for the sustainable preservation and management thereof should be drafted and implemented.

- After implementation of the proposed mitigation measures, the development may continue;

- It should be noted that the subterranean presence of archaeological and/or historical sites, features or artifacts is always a possibility. Care should be taken when development commences that if any of the mentioned are discovered, a qualified archaeologist be called in to investigate the occurrence.

11. REFERENCES

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APPENDIX A

EXPLAINING DIFFERENT ARCHAEOLOGICAL LOCALITIES:

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

HERITAGE ASSESSMENT CRITERIA:

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

APPENDIX C

SIGNIFICANCE AND FIELD RATING:

Cultural significance:

- Low — A cultural object being found out of context, not being part of a site or without any related feature/structure in its surroundings.

- Medium — Any site, structure or feature being regarded less important due to a number of factors, such as date and frequency. Also any important object found out of context.

- High — Any site, structure or feature regarded as important because of its age or uniqueness. Graves are always categorized as of a high importance. Also any important object found within a specific context.

Heritage significance:

- Grade I — Heritage resources with exceptional qualities to the extent that they are of national significance

- Grade II — Heritage resources with qualities giving it provincial or regional importance although it may form part of the national estate

- Grade III — Other heritage resources of local importance and therefore worthy of conservation

Field ratings:

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

APPENDIX D

PROTECTION OF HERITAGE RESOURCES:

Formal protection:

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

General protection:

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

APPENDIX E

HERITAGE IMPACT ASSESSMENT PHASES

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