SPECIALIST REPORT

PHASE 1 ARCHAEOLOGICAL / HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF TRIREACH LODGE AND STAFF HOUSING on *PORTION 262 OF THE FARM GUERNSEY 81KU*, LIMPOPO PROVINCE

REPORT PREPARED FOR

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JUNE 2020

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EXECUTIVE SUMMARY

A Phase 1 Heritage Impact Assessment (HIA) regarding archaeological and other cultural heritage resources was conducted on the footprint for staff housing and six lodge units, main building, a gym and associated infrastructure *on portion 262 of the farm Guernsey 81KU*, near Hoedspruit, Limpopo Province. The farm was previously used for cultivation and cattle farming and has now been included within the boundary of the Thornybush Nature Reserve.

The National Heritage Resources Act, no 25 (1999)(NHRA), protects all heritage resources, which are classified as national estate. The NHRA stipulates that any person who intends to undertake a development, is subjected to the provisions of the Act.

The footprint of the two sections were easily accessible. The section selected for the staff housing was dry, flat and open, where visibility was excellent. The lodge units are situated on either side of the non-perennial tributary to the Klaserie River, with riparian vegetation present. This section was slightly denser, but also dry and open and visibility was good. The section is zoned as agricultural and will be rezoned to conservation.

A few decorated and undecorated potsherds were observed near the staff housing section, and a round scraper implement, dating from the Middle Stone Age was identified at the area for the proposed lodge units. These were observed out of any archaeological or historical context, which have no heritage significance. No mitigation measures are required. No graves were observed in the study area.

Based on the survey and the findings in this report, Adansonia Heritage Consultants state that there are no compelling reasons which may prevent the proposed development to continue. The applicant must be aware that distinct archaeological material or human remains may only be revealed during the construction phase of the development. Should any sub-surface material be observed, an archaeologist must do an assessment and make recommendations.

Disclaimer: Although all possible care is taken to identify all sites of cultural significance during the investigation, it is possible that hidden or sub-surface sites could be overlooked during the study. Christine Rowe trading as Adansonia Heritage Consultants will not be held liable for such oversights or for costs incurred by the client as a result.

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- 1) The results of the project;
- 2) The technology described in any report;
- 3) Recommendations delivered to the Client.

JUNE 2020

Christine (Van Wyk) Rowe

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PHASE 1 ARCHAEOLOGICAL / HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF TRIREACH LODGE AND STAFF HOUSING *ON PORTION 262 OF THE FARM GUERNSEY 81KU*, LIMPOPO PROVINCE

A. BACKGROUND INFORMATION TO THE PROJECT

A Phase 1 Heritage Impact Assessment (HIA) regarding archaeological and other cultural heritage resources was conducted on the footprint for staff housing as well as lodge units on *portion 262 of the farm GUERNSEY 81KU*, which falls under the management of the Thornybush Nature Reserve, near Hoedspruit. ¹ The study area is situated on topographical map 1:50 000, 2431AC, which is in the Limpopo Province. This area falls under the jurisdiction of the Mopani District Municipality, and Maruleng Local Municipality. ²

EMROSS Consulting (Pty) Ltd. was appointed by TriReach Investments LLC to act as an independent environmental assessment practitioner to undertake a basic environmental assessment and to apply for authorisation from the Limpopo Department of Economic Development, Environment & Tourism (LEDET) for the development of a lodge and staff housing. The lodge will consist of 6 units, a main building and a gym, the staff housing will consist of one senior block, 2 junior blocks and three managers houses and an outbuilding (map 7). These farms are included within the management of the Thornybush Nature Reserve but have not been formally gazetted as part of the Thornybush Nature Reserve. ³

Adansonia Heritage Consultants were appointed by EMROSS Consulting, to conduct a Phase 1 heritage impact assessment (HIA) on archaeological and other heritage resources on the study area. A literature study, relevant to the study area as well as a foot survey was done, to determine that no archaeological or heritage resources will be impacted upon (see Topographical maps 2 & 4 & Appendix 1, Tracks and Paths).

The aims of this report are to source all relevant information on archaeological and heritage resources within the study area, and to advise the client on sensitive heritage areas as well as where it is viable for the development to take place in terms of the specifications as set out in the National Heritage Resources Act no., 25 of 1999 (NHRA). Recommendations for maximum

¹ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 3.

² BID Document, EMROSS Consulting, 8 November 2019, p. 3.

³ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, pp. 3-4.

conservation measures for any heritage resources will also be made. The study area is indicated in maps 1 - 8, & Appendix 1 & 2.

- This study forms part of an EIA, Consultant: EMROSS Consulting (Pty) Ltd, P.O. Box 507, White River, 1240. Cell: 0824678868 / e-mail: a.emery@emross.co.za
- Development of Staff Housing which will consist of an outbuilding, a senior staff building (10 beds), two junior staff buildings (12 beds each), and three manager houses (2 beds each); & a Lodge which will consist of a main building, 5 guest chalets (2 beds each), one family unit (4 beds), and a gym on the Thornybush Nature Reserve, west of the Kruger National Park, on portion 262 of the farm Guernsey 81KU, Limpopo Province.
- The farm was previously used for cultivation and cattle farming. The Lodge section will
 be situated on either side of a non-perennial tributary in indigenous riparian
 vegetation. The property is currently zoned as agricultural and will be rezoned to
 conservation & associated activities (eg. eco-tourism) & required support
 infrastructure.
- Location of Province, Magisterial district / Local Authority and Property (farms): The area falls within the Limpopo Province under the jurisdiction of the Mopani District Municipality and Maruleng Local Municipality. Land owner: TriReach Investments LLC, Mr. D. Suskin. 4

Terms of reference: As specified by section 38 (3) of the NHRA, the following information is provided in this report.

- a) The identification and mapping of heritage resources where applicable;
- b) Assessment of the significance of the heritage resources;
- c) Alternatives given to affected heritage resources by the development;
- d) Plans for measures of mitigation.

Legal requirements:

The legal context of the report is grounded in the National Heritage Resources Act no. 25, 1999, as well as the National Environmental Management Act (No. 107 of 1998) (NEMA, as amended).

⁴ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 1.

Section 38 of the NHRA

This report constitutes a heritage impact assessment investigation linked to the environmental impact assessment required for the development. The proposed development is a listed activity in terms of Section 38 (1) of the NHRA. Section 38 (2) of the NHRA requires the submission of a HIA report for authorisation purposes to the responsible heritage resources agency (SAHRA). Heritage conservation and management in South Africa is governed by the NHRA and falls under the overall jurisdiction of the South African Heritage Resources Agency (SAHRA) and its provincial offices and counterparts. ⁵

Section 38 of the NHRA requires a Heritage Impact Assessment (HIA) to be conducted by an independent heritage management consultant, for the following development categories:

- The construction of a road, wall, powerline, pipeline, canal or similar form of linear development or barrier exceeding 300m in length;
- Any development or other activity which will change the character of a site:
- exceeding 5000m² in extent;
- the rezoning of a site exceeding 10 000m² in extent;

In addition, the new EIA regulation promulgated in terms of NEMA, determines that any environmental report will include cultural (heritage) issues.

The end purpose of this report is to alert EMROSS Consulting, the Client, TriReach Investments LLC and interested and affected parties about existing heritage resources which may be affected by the proposed development, and to recommend mitigation measures aimed at reducing the risks of any adverse impacts on these heritage resources. Such measures could include the recording of any heritage buildings or structures older than 60 years prior to demolition, in terms of section 34 of the NHRA and also other sections of this act dealing with archaeological sites, buildings and graves.

The NHRA section 2 (xvi) states that a "heritage resource" means any place or object of cultural significance, and in section 2 (vi) that "cultural significance" means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance. Apart from a heritage report assisting a client to make informed development decisions, it also serves to provide the relevant heritage resources authority with the necessary data to perform their

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⁵ National Heritage Resources Act, no. 25 of 1999.

statutory duties under the NHRA. After evaluating the heritage scoping report, the heritage resources authority will decide on the status of the resource, whether the development may proceed as proposed or whether mitigation is acceptable, and whether the heritage resource require formal protection such as a Grade I, II or III, with relevant parties having to comply with all aspects pertaining to such a grading.

Section 35 of the NHRA

Section 35 (4) of the NHRA stipulates that no person may, without a permit issued by SAHRA, destroy, damage, excavate, alter or remove from its original position, or collect, any archaeological material or object. This section may apply to any significant archaeological sites that may be discovered. In the case of such chance finds, the heritage practitioner will assist in investigating the extent and significance of the finds and consult with an archaeologist about further action. This may entail removal of material after documenting the find or mapping of larger sections before destruction. Some decorated and undecorated clay potsherds, as well as a stone artefact were observed during the survey.

Section 36 of the NHRA

Section 36 of the NHRA stipulates that no person may, without a permit issued by SAHRA, 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. It is possible that chance burials might be discovered during development of the road infrastructure or agricultural activities. This section does not apply since no graves were identified within the study area.

Section 34 of the NHRA

Section 34 of the NHRA stipulates that no person may alter, damage, destroy, relocate etc., any building or structure older than 60 years, without a permit issued by SAHRA or a provincial heritage resources authority. No structures older than 60 years were observed during the survey.

Section 37 of the NHRA

This section deals with public monuments and memorials but does not apply in this report.

NEMA

The regulations in terms of Chapter 5 of the National Environmental Management Act (NEMA), (107/1998, as amended), provides for an assessment of development impacts on the cultural (heritage) and social environment and for specialist studies in this regard.

B BACKGROUND TO ARCHAEOLOGY AND HISTORY OF THE STUDY AREA

Literature review, museum databases & previous relevant impact assessments

Primary and secondary sources were consulted to place the surrounding area in an archaeological context. Ethnographical and linguistic studies by early researchers such as Ziervogel and Van Warmelo shed light on the cultural groups living in the area since ca 1600. Historic and academic sources by Meyer, Voight, Bergh, De Jongh, Evers, Myburgh, Thackeray and Van der Ryst were consulted, as well as historic sources (Makhura and Webb). Van Warmelo based his 1935 survey of *Bantu Tribes of South Africa* on the number of taxpayers in an area. The survey does not include the extended households of each taxpayer, so it was impossible to actually indicate how many people were living in one area. ⁶ (See Map 1: Van Warmelo 1935).

Primary sources were consulted from the Pilgrim's Rest Museum Archives for a background on the pre-history and history of the study area. Several circular stone-walled complexes and terraces as well as graves have been recorded in the vicinities of Hazyview ⁷, Bushbuckridge, Graskop, Sabie, Hoedspruit and Klaserie. Clay potsherds and upper as well as lower grinders, are scattered at most of the sites. ⁸ Many of these occur in caves as a result of the Swazi attacks during the 1900's on smaller groups.

Archaeological Background

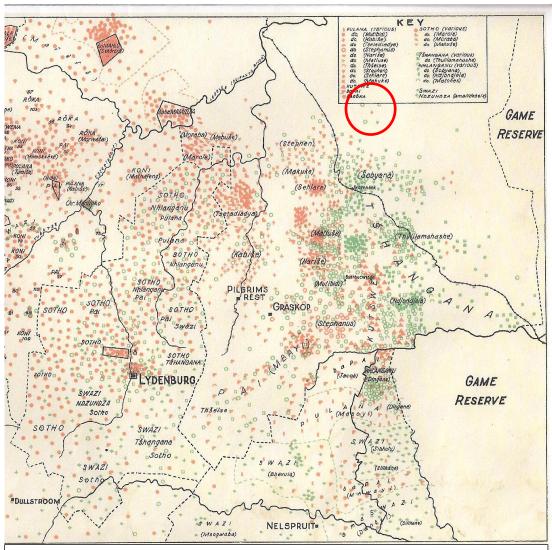
The area is generally known as the *Lowveld*, of which the Hoedspruit / Klaserie area forms a part. Very little contemporary research has been done on prehistoric African settlements in the direct study area. Later Stone Age sites in the Kruger National Park date to the last 2500 years and are associated with pottery and microlith stone tools.⁹

⁶ N.J. van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p.9.

⁷ PRMA: Information file 9/2.

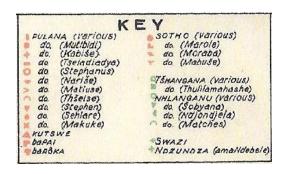
⁸ D. Ziervogel, The Eastern Sotho, A Tribal, Historical and Linguistic Survey, p. 3.

⁹ J.S. Bergh (red)., Geskiedenis Atlas van Suid Afrika: Die vier Noordelike Provinsies, p. 95.



MAP 1: VAN WARMELO 1935

According to the map by Van Warmelo, the study area (indicated by the oval) was sparsely populated during the early 20th century. The surrounding communities were mainly of Tshangana / Nhlanganu & Sotho / Pulana decent.



The wider area is quite rich in archaeological history and the first evidence of ancient mining occurred between 46 000 and 28 500 years ago during the Middle Stone Age. Hematite or red ochre was mined at Dumaneni and is regarded as one of the oldest mines in the world. Iron ore was also mined in the area, and a furnace as well as iron slag were documented.¹⁰ Research has been done by the Pilgrim's Rest Museum on San rock art as well as rock art made by Bantu speakers in the Escarpment area, but none have been recorded in the study area.¹¹

Stone Age:

The Stone Age is the period in human history when people produced stone tools. The Stone Age in South Africa can be divided in three periods:

- Early Stone Age (ESA): +- 2 million 150 000 years ago;
- Middle Stone Age (MSA): +- 150 000 30 000 years ago;
- Later Stone Age (LSA): +- 40 000 1850AD.

The study area has originally been inhabited by the San or Bushman people as the many Stone Age tools and occasionally rock art sites found from the escarpment to the arid *Lowveld*, indicate.¹²

Iron Age:

The Iron Age is the period in time when humans manufactured metal artifacts. According to Van der Ryst & Meyer, ¹³ it can be divided in two separate phases, namely:

- Early Iron Age (EIA) +- 200 1000 AD;
- Late Iron Age (LIA) +- 1000 1850 AD.

The earliest appearance of Iron Age people in the foothills of the Drakenberg, is probably around 800 – 1100AD,¹⁴ although the earliest date so far for black settlement in South Africa is around 200 AD from the Silver Leaves site near Tzaneen.¹⁵ From the 15th and 18th centuries, the Lowveld was a hive of activity before European settlement. Research done by T.M. Evers and other researchers in the early 1970's, revealed that this area was inhabited by Sotho people of the baPhalaborwa tradition (or Late Iron Age - LIA) – from approximately 1000 AD.

¹⁰ Bornman, H., *The Pioneers of the Lowveld*, p. 1.

¹¹ PRMA: Information file 9/2.

¹² M. De Jongh, Swatini, p. 9.

¹³ Van der Ryst, M.M, & Meyer, A, Die Ystertydperk in *Geskiedenis Atlas van Suid-Afrika Die Vier Noordelike Provinsies*, pp. 96 – 98.

¹⁴ *Ibid.*, p. 9.

¹⁵ T.M. Evers, Three Iron Age Industrial sites in the Eastern Transvaal Lowveld, Fig. 87.

Excavations on the farms *Harmony 24 and 25*, and *Makhutswi*, by T.M. Evers confirmed that the people belonged to the "Phalaborwa" culture or tradition, dating to the LIA.¹⁶ They produced salt and copper in the area for local and long-distance trade. A soapstone bowl factory was also identified, and the soapstone bowls were used for salt production, ¹⁷ and was a trading commodity.

Pelser excavated an Early Iron Age site near Hoedspruit on the farm *Happyland 241KT*. The site dated to between AD450 & AD1000 and contained hut remains, burials, cattle kraal deposits, pottery and faunal remains. According to Huffman, and based on the decorated pottery which was recovered during the excavations, there were two phases of settlement, namely the Mzonjani facies (Urewe tradition), dating between AD450 & AD700, and the Doornkop facies (Kalundu tradition), dating between AD750 & AD1000. ¹⁸

The abundant minerals in the area, metallurgy and salt production may have been major reasons for settlement in this part of the Lowveld.¹⁹ Copper (on *Harmony 25*), ancient gold workings on the farm *Maranda*, mica on *Islington*, copper and iron at Gravelotte and Phalaborwa,²⁰ were mined and worked by the local inhabitants, which indicate the use of an advanced technology. Prof J.F. Eloff mentions in *Neem uit die Verlede*, that iron was already worked since the fifteenth century. ²¹

Ethnohistorical studies by Krige (1937), Van Warmelo (1944), Du Toit (1967) and Scully (1971) identified the community relations in this area as of Sotho origin, which included groups such as the Phalaborwa, Narere, Thabina, Koni and the Khaha,²² or Kgaga.²³ They settled here as long ago as ca 1000 AD. ²⁴ ²⁵

¹⁶ *Ibid.*, pp. 54-56.

¹⁷ *Ibid.*, pp. 1-3.

¹⁸ A. Pelser, Report on a Phase 1 HIA for the upgrade of the Wits rural facility on portion 175 of the farm Guernsey 81KU, Klaserie / Acornhoek, p. 14.

¹⁹ T.M. Evers, *Three Iron Age Industrial sites in the Eastern Transvaal Lowveld*, p. 6.

²⁰ *Ibid.*, p. 5.

²¹ J.F. Eloff, 'n Nuwe Orde: Swart indringing en kolonisasie van die Laeveld, *in U. de V. Pienaar, Neem Uit die Verlede*, p. 31.

²² T.M. Evers, *Three Iron Age Industrial sites in the Eastern Transvaal Lowveld*, p. 79.

²³ J.S. BERGH, (red.), Geskiedenis Atlas van Suid-Afrika: Die vier Noordelike Provinsies, P. 10.

²⁴ T.M. Evers, Three Iron Age Industrial sites in the Eastern Transvaal Lowveld, p. 80.

²⁵ C. (van Wyk) Rowe: Archaeological Heritage impact assessment on the remainder of the farm Lekkergoed 158KT, (Stand 10), Leopardrock Nature Estate, Limpopo Province, p. 15.

Pre-Colonial History

The whole district is divided in two, with the Drakensberg Escarpment in the west, and the Low Veld (in which the study area is situated) towards the east. Today, we found that the boundaries of groups are intersected and overlapping.²⁶ Languages such as Zulu, Xhosa, Swazi, Nhlanganu, Nkuna, sePedi, hiPau and seRôka, are commonly spoken throughout this area.²⁷

When the Swazi began to expand northwards, they forced the local inhabitants out of Swaziland, or absorbed them.²⁸ There is evidence of resistance, but the Eastern Sotho groups who lived in the northern parts of Swaziland, moved mainly northwards.²⁹ This appears to have taken place towards the end of the 18th century,³⁰ when these groups fled from Swaziland to areas such as Nelspruit, Hazyview, Bushbuckridge, Klaserie, Blyde River and Komatipoort.³¹ The only early trade route mentioned, which crossed this section, was a footpath used by the African groups from Delagoa Bay towards Bushbuckridge (Magashulaskraal as it was previously named), along the Sabie river, up the Escarpment, and further north to the Soutpansberg.³² There is however, no physical evidence left of this early route.

Groups which are found in this area are Eastern Sotho (Kutswe, Pai and especially the Pulana), as well as Tsonga groups:

Eastern Sotho group: The Pulana

The history of the Pulana goes back to the Barberton area from where they trekked via Krokodilpoort (Nelspruit district) to settle north-east of Pretoriuskop. When the Swazi invaded them, they moved on and split up under several chieftainships, ³³ of who chief Kobêng Moxane (after which Kowyns Pass was named), ³⁴ is well mentioned in history. ³⁵

²⁸ A.C. Myburgh, *The Tribes of Barberton District*, p. 10.

²⁶ N.J. van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p. 51.

²⁷ M. De Jongh (ed)., Swatini, p. 21.

²⁹ N.J. Van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa. p. 111.

³⁰ H. S. Webb, The Native Inhabitants of the Southern Lowveld, *in Lowveld Regional Development Association, The South-Eastern Transvaal Lowveld.* p. 14

³¹ *Ibid.*, p. 16.

³² L. Changuion & J.S. Bergh, Swart gemeenskappe voor die koms van die blankes, *in J.S. Bergh (red)., Geskiedenis Atlas van Suid Afrika: Die vier Noordelike Provinsies.* p. 104.

³³ N.J. van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p. 9.

³⁴ N.J. van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p. 112.

³⁵ C. Rowe: Heritage Management of Archaeological, Historical and Industrial Resources on the Blyde River Canyon Nature Reserve, pp. 37-38.

The Pulana roughly lived in the following areas: north of the Crocodile River, west of the western boundary of the Kruger National Park as far north as its crossing the Sabie River, south of the Sabie River until its cutting through the main road from Pretoriuskop to Bushbuckridge, west of this road as far as Klaserie, south of a line drawn from Klaserie to the confluence of the Blyde and Ohrigstad rivers, east of the Blyde River, Mount Anderson, Mauchsberg, Makobolane mountain and Houtboschloop, to the latter's confluence with the Crocodile River. This area includes the Blyde Canyon Nature Reserve and is divided in two by the main road from Pilgrim's Rest to Bushbuckridge. Kowyns Pass was since ancient times the only connection between the Lowveld and the escarpment. ³⁶ The majority of Pulana lived to the north of this line, while south of this line the Pulana were scattered in groups into which were wedged Pai groups on both sides of the Sabie River, and Swazi people in the south, and south-eastern portions. ^{37 38} The battle of Moholoholo (Mogologolo), took place in 1864 between the Pulana of Chief Maripe, and the Swazi at Mariepskop ('Thaba ya Moholoholo'), in the Blyde River Canyon. The Pulana defeated the Swazi in this battle.

Tsonga groups: The Nhlanganu and Tšhangana

The Nhlanganu and Tšhangana (also generally known as the Shangaan-Tsonga)³⁹ form part of the larger Tsonga group of which the original group occupied the whole of Mosambique (Portuguese East Africa), and it has been recorded that by 1554, they were already living around the Delagoa Bay area (Maputo).⁴⁰ They fled from the onslaughts of the Zulu (Nguni) nation from the Natal area and great numbers of emigrants sought safety in the "Transvaal" as recently as the 19th century, especially in the greater Pilgrim's Rest district (including the study area that we are concerned with). The Tsonga also moved west from Mozambique into the "Transvaal". They have never formed large powerful tribes but were mostly always subdivided into loosely-knit units which were absorbed under the protection of whichever chief would give them land.⁴¹ They were originally of Nguni origin.⁴² The term "Shangaan" is commonly employed to refer to all members of the Tsonga division.⁴³

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³⁶ M. De Jongh (ed)., Swatini, p. 21.

³⁷ D. Ziervogel, The Eastern Sotho, A Tribal, Historical and Linguistic Survey, p. 107.

³⁸ N.J. van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p. 111.

³⁹ M. De Jongh (ed)., Swatini, p. 24.

⁴⁰ N.J. Van Warmelo, Grouping and Ethnic History, *in Schapera I., The Bantu-Speaking Tribes of South Africa. An Ethnographical survey*, p. 55.

⁴¹ N.J. Van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, pp. 90-91.

⁴² N.J. Van Warmelo, Grouping and Ethnic History, *in Schapera I., The Bantu-Speaking Tribes of South Africa. An Ethnographical survey,* p. 55.

⁴³ N.J. Van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p. 92

The **Nhlanganu** occupied the Low Veld area in their efforts to escape the Zulu raids during 1835-1840. They lived side by side with the Tšhangana, and the differences between the two are inconsiderable. They have mixed extensively with other tribes.⁴⁴

The **Tšhangana** are also of Nguni origin who fled in the same way as the Nhlanganu, settled in the "Transvaal" a little later than the former. Most of the Tsonga were subjects to *Soshangane*, who came from Zululand.⁴⁵ The downfall of *Ngungunyana* (son of *Soshangane*) saw his son seeking sanctuary in the "Transvaal", and the latter became known as *Thulamahashi*,⁴⁶ the name that is still used for the area east of Bushbuckridge.

The historical background of the study area confirms that it was occupied since the 17th century by the Eastern Sotho (Pai, Kutswe and Pulana) as well as Tsonga groups (Nhlanganu and Tšhangana). These groups have intermarried extensively or were absorbed by other groups in time, and today groups such as Eastern Sotho, South-Ndebele, Swazi, Tsonga and Northern-Sotho occupy this area.⁴⁷

• European settlement:

The presence of malaria and tsetse fly in the north-eastern *Lowveld* area were the main factors which prevented Europeans from settling here for a long time. Eventually two groups of people, with different motives, made the journey into the *Lowveld* - the first was the *Voortrekkers* (early 1800's) and the second, hunting parties, prospectors and miners.⁴⁸

The search for gold was one of the reasons why geologists and prospectors visited the *Lowveld* area. Reef gold, was discovered in 1870 on the farm *Eersteling* (near the current Polokwane (Pietersburg). The gold was not viable, but it was enough to create a gold rush by fortune seekers, of who some who stayed behind. Remains of their presence are abundant. ⁴⁹

The author was involved in desktop studies and surveys in the area, such as:

• Inspection of Umbhaba Stone-walled settlement, Hazyview, (2001);

⁴⁵ N.J. Van Warmelo, Grouping and Ethnic History, *in Schapera I., The Bantu-Speaking Tribes of South Africa. An Ethnographical survey,* p. 57.

⁴⁴ *Ibid.*, pp. 91-92.

⁴⁶ N.J. Van Warmelo, A Preliminary Survey of the Bantu Tribes of South Africa, p. 92.

⁴⁷ M. De Jongh (ed)., Swatini, p. 40.

⁴⁸ J. Verhoef, Prospekteerders en delwery, in U. de V. Pienaar, Neem Uit die Verlede, p. 230.

⁴⁹ J. Verhoef, Prospekteerders en delwery, in U. de V. Pienaar, Neem Uit die Verlede, p. 232.

- A Phase 1 Archaeological and Heritage Impact Assessment for 132Kv Powerlines from Kiepersol substation (Hazyview), to the Nwarele substation Dwarsloop (2002);
- Study for the Proposed Eskom Powerlines, Hazyview Dwarsloop (2008);
- Archaeological Heritage Impact Assessment on the remainder of the farm LEKKERGOED 158KT, Leopardrock Nature Estate, Limpopo Province; LIA evidence was observed.
- A Phase 1 Archaeological and Heritage Impact Assessment for a proposed traffic training academy, Calcutta, Mkhuhlu, Bushbuckridge (2013);
- Phase 1 Archaeological and Heritage Impact Assessment for the proposed Nkambeni cemetery in Numbi, Hazyview (2013);
- Phase 1 Archaeological and Heritage Impact Assessment for a Development on the farm Agricultural Holding no 56 JU, White River (2013) was done in the wider area;
- Phase 1 Archaeological and Heritage Impact Assessment for proposed agricultural development on the farm SIERAAD, Komatipoort area, (2013) revealed one possible Late Stone Age borer which was identified in a soil sample, one meter below the surface;
- Phase 1 AIA / HIA for proposed debushing of natural land for agricultural use: Portion 10 of the farm Thankerton 175JU, Hectorspruit, Mpumalanga Province (2013); revealed some Later Stone Age artifacts which were all out of context and a burial site;
- Phase 1 AIA / HIA for the proposed residential township, Tekwane extension 2, portion 7
 of the farm Tekwane 537 JU. No archaeological material of significance was identified
 (2013).
- Report on Grave site found at portion 7 of the farm Tekwane 537 JU, in way of amended Bulk Sewer Pipeline, Kanyamazane, Mpumalanga Province (2017) – Large graveyard identified (2013).
- Letter of recommendation for the exemption from a Phase 1 AIA / HIA for the proposed new position for the Gutshwa substation, Gutshwa (near White River) (2016);
- Phase 1 AIA / HIA for the proposed construction of a 0.75ML/D water treatment plant and bulk line on government land at Makoko Village (near White River) Kabokweni, Mpumalanga Province residential township, Tekwane extension 2, portion 7 of the farm (2017) – no significant archaeological sites were observed;
- Phase 1 AIA / HIA for the proposed 2ha development of the Msogwaba Youth
 Development Centre on a portion of the farm Nyamasaan 647JU, Msogwaba,

- Mpumalanga province no significant archaeological sites were observed (2018).
- Phase 1 AIA / HIA for a proposed agricultural development on the farm Krokodilspruit 248JT, White River, Mpumalanga Province (2018) – some archaeological features as well as graves were observed.
- Phase 1 AIA / HIA for a proposed development of a lodge on a portion of the farm CORK
 295KU (10ha), Mkhuhlu Bushbuckridge, Mpumalanga Province (2018).
- Phase 1 AIA / HIA for a proposed establishment of macadamia plantation on portion 1 of the farm Peebles 31-JU, White River, Mpumalanga Province (2019) - no significant archaeological sites were observed.
- Phase 1 AIA / HIA for the rectification of unlawful commencement for the construction of a lodge & associated infrastructures on a portion of the farm CORK 295KU, Mkhuhlu Bushbuckridge, Mpumalanga Province (2019) - no significant archaeological sites were observed.
- Phase 1 AIA / HIA for a proposed Lodge development on the remainder and part of portion 6 of the farm LISBON 297KU, Bushbuckridge, Mpumalanga Province (2019) - no significant archaeological sites were observed, only one grave.
- Phase 1 AIA / HIA for a proposed development of tourist accommodation on portion 61 of the farm Guernsey 81KU, Limpopo Province (2020) - no significant archaeological sites were observed (near Hoedspruit).
- Phase 1 AIA / HIA for the rectification of unlawful commencement of citrus orchards on portion 1 and the r/e of the farm BOSBOK 793LT, Phalaborwa, Limpopo Province (2020)
 no archaeological or historical sites were observed (near Phalaborwa).

The SAHRA database for archaeological and historical impact assessments was consulted and revealed other recent Archaeological Impact assessment reports in the area:

- Van Vollenhoven: A Report on a basic assessment relating to cultural heritage resources for the proposed ESKOM Tekwane North line and substations, Mupumalanga Province (2013) – revealed historic remains of low significance and a cemetery.
- A. Pelser: A Report on Archaeological phase 2 mitigation of an early farmer site to be impacted on by the development of the Zandspruit Eco Estate on the farm Happyland 241KT, Hoedspruit, Limpopo Province, (2008);
- A. Pelser: A report on a phase 1 HIA for the upgrade of the Wits Rural facility: Training & Research centre located on portion 175 of the farm Guernsey 81KU, near Klaserie & Acornhoek, Limpopo Province, (2013);

- A. Pelser: A report on background archival & historical research pertaining to the Lemana College & Elim Mission station, Limpopo province, (2013);
- A. Pelser: A report on the Phase 2 Archaeological mitigation of 2 Stone Age open-air sites to be impacted by the Nwamitwa dam development project on the farms La Motte 464LT & Riverside 514LT in the Letsitele area near Tzaneen, Limpopo Province (2016);
- A. Pelser: Report on the AIA of various quarry, stockpile, road construction camps, borrow pits, dam construction camp sites and other associated infrastructures related to the Nwamitwa Dam development project, Limpopo Province, (2016);
- A. Pelser: Final report on the assessment of cultural heritage resources (incl. grave sites & archaeological sites) to be impacted by the Nwamitwa dam and associated infrastructure development, Limpopo Province, (2016).
- A. Pelser: Report on a phase 1 HIA for the proposed development of a private hospital on a portion of the farm Greater Giyani 891LT, Giyani, Limpopo province, (2017);
- A. Pelser: Report on a phase 1 HIA for the proposed cultivation of Macadamia nuts, avocados and guava on ptn 1 of Palmietfontein 2LT, near Louis Trichardt, Limpopo (2018);

C. DESCRIPTION OF THE AREA TO BE AFFECTED BY THE PROPOSED DEVELOPMENT

The historic landuse of *portion 262 of the farm Guernsey 81KU*, was a mixture of cultivated land and cattle farming as is evident in the 1986 topographical map (map 4), and historical aerial photograph (map 2). The landuse changed in the early 2000s to conservation based landuse and the vegetation has gradually been rehabilitated. The surrounding areas are either protected areas or game farms. ⁵⁰ The study area (farm), is owned by TriReach Investments LLC.

The farm has now been included within the boundary of the Thornybush Nature Reserve and TriReach wishes to build a lodge and a staff village to house staff for their lodge and surrounding landowners. The proposed development will consist of a staff village with an outbuilding, a senior staff building with 10 beds, two junior staff buildings with 12 beds each, and three manager houses with 2 beds in each (see maps 6 - 8). The lodge will consist of a main building with a kitchen, dining room and lounge, there will be 5 guest chalets each with 2 beds, one larger family unit with 4 beds and a separate gym (see map 6). Access to the chalets will

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⁵⁰ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 14.

be via elevated walkways to a road that will be used by golf carts. ⁵¹ The elevated walkway will lead from the lodge units to the access roads. On the western side of the river the existing access road will be maintained, but on the eastern side the existing road will be closed and rehabilitated. ⁵² (See figs. 9 & 10).

The basement geology of the area is the Nelspruit Suite granite and migmatite. These granite and gneiss weather into sandy soils in the uplands and soils with high clay and sodium content in the lowlands (Mucina and Rutherford, 2006). 53

The vegetation of the area is described by Mucina and Rutherford (2006) as being part of the savanna biome as the Granite Lowveld. The Granite Lowveld stretches in a north-south belt from northern KwaZulu-Natal through to Limpopo Province. Typical trees of the uplands include *Terminalia sericea*, *Combretum zeyheri* and *Combretum apiculatum*. The dense thicket to open savanna includes *Senegalia nigrescens*, *Dichrostachys cinerea*, and *Grewia bicolour*. ⁵⁴

D. LOCALITY

The property is located approximately 12km along the Guernsey road after the turn off from the R40, 22km south of Hoedspruit. It is situated within the Maruleng Local Municipality, Mopani District Municipality, Limpopo Province. ⁵⁵ It is located in the Greater Kruger Region of the Limpopo Province *on portion 262 of the farm Guernsey 81 KU*. It is in close proximity to the town of Hoedspruit and other well-known tourist attractions in the area (see maps 2 & 3).

The Staff village is situated approximately 265m west of the non-perennial tributary running north-south through the property and about 140m east of the main Guernsey dirt access road. The development is situated on a gentle east facing slope. The lodge units are situated on either side of the non-perennial tributary to the Klaserie River and on the edge of the riparian vegetation (see GPS co-ordinates below, map 6 - 8 & figs. 1 - 28).

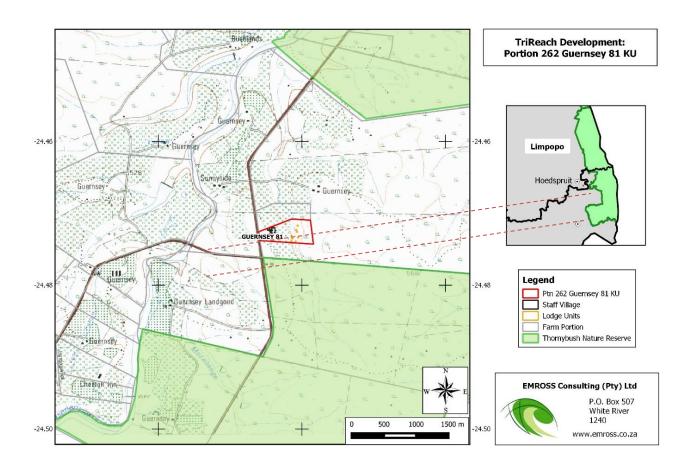
⁵¹ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 8.

⁵² Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 8.

⁵³ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 13.

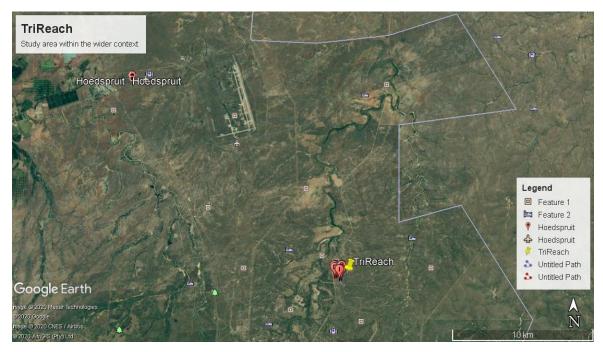
⁵⁴ Draft BA Report: TriReach Lodge & Staff housing development, Emross Consulting, p. 13.

⁵⁵ BID Document, EMROSS Consulting, 8 November 2019, p. 2.

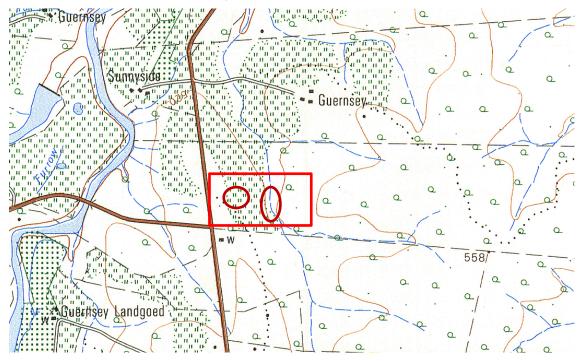


MAP 2: Topographical Map: 2431AC: The farm is indicated with the red line.

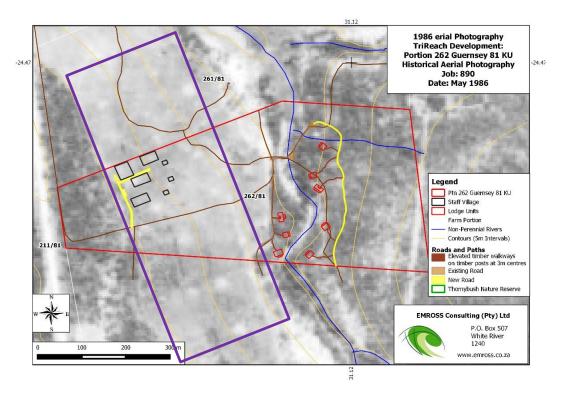
The 1986 topographical map (2431AC) (map 4), revealed that the site for the staff housing was historically disturbed cultivated lands. The sections for the Lodge units are situated along and on both sides of a non-perennial tributary. No other archaeological or historical features were indicated on this map (maps 4, figs. 1 - 28).



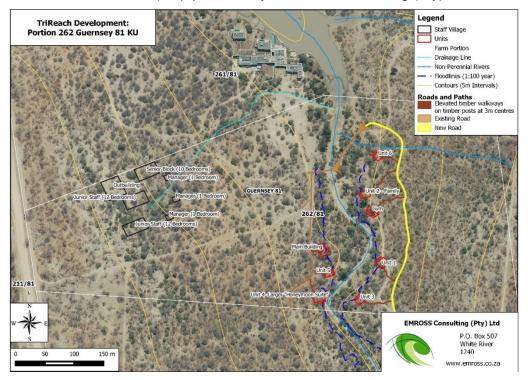
MAP 3: The study area, as seen within a wider context.



MAP 4: The 1986 topographical map clearly indicates the cultivated areas. The proposed staff housing site (left) is entirely situated on historically disturbed land.



MAP 5: 1986 Aerial photograph: The purple square indicates the historically disturbed cultivated area (Map provided by EMROSS Consulting (Pty) Ltd.



MAP 6: The layout of the proposed sites. The staff housing is located to the west (black), and the lodge units (red), on either side of the tributary (Map provided by EMROSS Consulting).

Description of methodology:

The topographical map (2431AC, map 4), and Google images of the site (maps 6 & 8), indicate the study area of the proposed development. These were intensively studied to assess the current and historically disturbed areas and infrastructure. In order to reach a comprehensive conclusion regarding the cultural heritage resources in the study area, the following methods were used:

- The desktop study consisted mainly of archival sources studied on distribution patterns
 of early African groups who settled in the area since the 17th century, and which have
 been observed in past and present ethnographical research and studies.
- Literary sources, books and government publications, which were available on the subject, have been consulted, to establish relevant information.
- Specialists currently working in the fields of anthropology and archaeology have also been consulted on the subject.
- -Literary sources: A list of books and government publications about prehistory and history of the area were cited, and revealed some information;
- -The archaeological database of SAHRA as well as the National Cultural History Museum was consulted. Heritage Impact Assessment reports of specialists who worked in the area were studied and are quoted in section B.
- The fieldwork and survey were conducted extensively by three people on foot. Existing tracks and paths were used to access sections (see Appendix 1).
- The proposed sites for the development was even and accessible, sloping gently towards a non-perennial tributary. The site visit was conducted during winter (June 2020), and the area was open and accessible. Visibility was in general, excellent. The site was small enough for a thorough survey.
- Relevant data was located with a GPS instrument (GPSMAP 64X series) datum WGS
 84, and plotted. Co-ordinates were within 3 meters of identified sites.
- Evaluation of the resources which might be impacted upon by the footprint, was done
 within the framework provided by the National Heritage Resources Act, no. 25 (1999);
- Personal communication with environmental practitioner Mr. Anthony Emery, the manager of Kubili Lodge, Mr. Wayne Dickenson, and tourist guide Mr. Declan Kofer were held. ⁵⁶ ⁵⁷ ⁵⁸

⁵⁶ Personal communication: Mr. Anthony Emery, EMROSS Consulting (Pty) Ltd, 2020-06-16.

⁵⁷ Personal communication: Mr. Wayne Dickenson, Manager Kubili Lodge, 2020-06-04.

⁵⁸ Personal communication: Mr. Declan Kofer, Tourist Guide, Kubili Lodge, 2020-062-04.

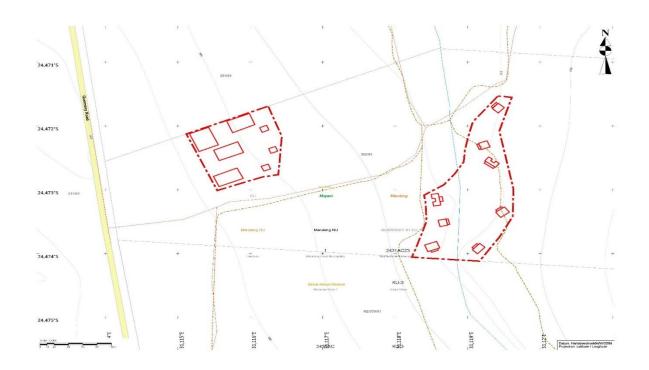
GPS co-ordinates were used to locate the perimeters and any heritage features within the study area, see map 8 (approximate Co-ordinates from documents by EMROSS Consulting):

Staff housing development footprint: A - D;

Lodge unit footprint: E - I.

GPS CO-ORDINATES									
Location	Elevation								
STAFF HOUSING FOOTPRINT									
Α	S 24° 28' 19.11"	E 31° 06' 52.59"	535m						
В	S 24° 28' 18.08"	E 31° 06' 57.83"	527m						
С	S 24° 28' 21.54"	E 31° 06' 59.24"	529m						
D	S 24° 28' 22.83"	E 31° 06' 53.81"	534m						

GPS CO-ORDINATES										
Location	Elevation									
	LODGE UNITS FOOTPRINT									
Е	S 24° 28' 22.09"	E 31° 07' 06.91"	522m							
F	S 24° 28' 18.44"	E 31° 07' 09.82"	521m							
G	S 24° 28' 18.57"	E 31° 07' 11.68"	523m							
Н	S 24° 28' 28.01"	E 31° 07' 09.80"	523m							
I	S 24° 28' 27.76"	E 31° 07' 05.79"	524m							



MAP 7: Detailed layout of the proposed location of staff housing (west), and Lodge units (east). (Map provided by Henry Schurink, GEO3). ⁵⁹

E. DESCRIPTION OF IDENTIFIED SITES

EMROSS Consulting (Pty) Ltd., in association with TriReach Investments LLC requested the development of Staff housing on previously disturbed cultivated lands, as well as Lodge units, Main building and Gym on either side of a non-perennial tributary to the Klaserie River, *on portion 262 of the farm Guernsey 81KU* (map 7; figs. 1 – 28).

A site visit was arranged on 04 June 2020 and the study area was surveyed by three people on foot. The manager of Kubili Lodge, Mr. Wayne Dickinson was able to point out the exact locations of the proposed development. The area was even, open and accessible and existing tracks and paths were also used to access the study area. The terrain gently sloped towards the non-perennial tributary (figs. 11 & 12). The site visit took place in winter and the area was small enough to do a thorough survey (see Appendix 2).

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⁵⁹ Personal communication: Mr. Henry Schurink, Email access: 2020-06-05.

All comments should be studied in conjunction with the maps, figures and appendices, which indicate the study area, and which correspond with the summaries below. Photographs in Appendix 2 show the general view of the study area. The following archaeological material was observed during the survey:

Feature / Site	Description / Comments	Site Location									
	ARCHAEOLOGICAL / HERITAGE FEATURES										
Clay Potsherds	Clay Potsherds Fragments of decorated and undecorated clay										
	potsherds scattered to the north of the staff housing	31°06'54.92"E									
	area. They vary in size and colour (Outside of the	Elev. 530m									
	study area).										
	Figs. 5 – 8.										
MSA Round	One stone implement, a round scraper dating from the	24°28′ 24.87″S									
scraper (stone	Middle Stone Age (MSA) was identified next to the	31°07' 06.54"E									
implement)	implement) access road for Lodge Unit 5. This artefact is not within										
	any archaeological context (inside the study area).										
	Fig. 24.										

The section for the proposed Staff Housing, was situated on previously disturbed cultivated lands. A few undecorated clay potsherds were observed between the access road and the proposed site (figs. 5 - 8 & map 8). These potsherds were located in a previously disturbed cultivated area and out of any archaeological context.

One stone implement (a round scraper), dating from the Middle Stone Age was observed at the site for Lodge Unit 5 (fig. 24 & map 8). This stone implement was situated next to the access road to Unit 5. No other implements were observed in the area and it is out of any archaeological context.

Apart for these artefacts, no other archaeological, historical remains or graves were identified within the study area.



MAP 8: Perimeters and features of study areas A-D (staff housing) and E-I (Lodge units).

F. DISCUSSION ON THE FOOTPRINT OF THE PROPOSED DEVELOPMENT

ACT	COMPO- NENT	IMPLICATION	RELEVANCE	COMPLIANCE
NHRA	S 34	Impact on buildings and structures older than 60 years	None present	None
NHRA	S35	Impacts on archaeological heritage resources	Clay potsherds were outside of study area and MSA round scraper is out of context.	No significance – no mitigation recommended
NHRA	S36	Impact on graves	None present	None
NHRA	S37	Impact on public monuments	None present	None
NHRA	S38	Developments requiring an HIA	Development is a listed activity	HIA done

ACT	СОМРО-	IMPLICATION	RELEVANCE	COMPLIANCE		
	NENT					
NEMA	EIA	Activities requiring an	Development is subject	HIA is part of		
	regulation	EIA	to an EIA	EIA		
	s					

• Summarised identification and cultural significance assessment of affected heritage resources: General issues of site and context:

Context								
Urban environmental context	No	NA						
Rural environmental context	No	NA						
Natural environmental context	Υ/	Previously cultivated as well						
	N	as natural vegetation						
Formal prot	ectio	n (NHRA)						
(S. 28) Is the property part of a	Υ	Will soon be incorporated in						
protected area?		the Thornybush Nature						
		Reserve						
(S. 31) Is the property part of a	No	NA						
heritage area?								
0	ther							
Is the property near to or visible	Yes	In the Jabulani Conservancy						
from any protected heritage sites		which is part of the						
		Thornybush Nature Reserve,						
		next to the Kruger National						
		Park						
Is the property part of a	No	NA						
conservation area of special								
areas in terms of the Zoning								
scheme?								

Context									
Does the site form part of a historical settlement or townscape?	No	NA							
Does the site form part of a rural cultural landscape?	No	NA							
Does the site form part of a natural landscape of cultural significance?	No	NA							
Is the site adjacent to a scenic route?	No	NA							
Is the property within or adjacent to any other area which has special environmental or heritage protection?	Yes	In the Jabulani Conservancy which is part of the Thornybush Nature Reserve, next to the Kruger National Park							
Does the general context or any adjoining properties have cultural significance?	No	NA							

Property features and characteristics										
Have there been any previous development impacts on the property?	Υ	The site selected for the staff housing was historically disturbed land								
Are there any significant landscape features on the property?	No	NA								
Are there any sites or features of geological significance on the property?	No	NA								

Property features and characteristics										
Does the property have any rocky outcrops on it?	No	NA								
Does the property have any fresh water sources (springs, streams, rivers) on or alongside it?	Yes	Non-perennial tributary of the Klaserie River								

Heritage resources on the property										
Formal protection (NHRA)										
National heritage sites (S. 27)	No	NA								
Provincial heritage sites (S. 27)	No	NA								
Provincial protection (S. 29)	No	NA								
Place listed in heritage register (S. 30)	No	NA								
General protection (NHRA)										
Structures older than 60 years (S. 34)	No	NA								
Archaeological site or material (S. 35)	Yes	Out of archaeological context and of no significance								
Graves or burial grounds (S. 36)	No	NA								
Public monuments or memorials (S. 37)	No	NA								
0	ther									
Any heritage resource identified in a heritage survey (author / date / grading)	No	NA								
Any other heritage resources (describe)	No	NA								

NHRA	ELE-		IN	DICA	TOR	S OF F	<i>IERIT</i>	AGE S	IGNIF	CANC	E	RISK
S (3)2	MENT	Hist	Rar	Sci	Турі	Tech	Aest	Pers	Land	Mate	Sustain	
Heritage	S	oric	е	ent	cal	nolo	hetic	on	mark	rial	ability	
resource		al		ific		gical		/com		cond		
category								muni		ition		
								ty				
Buildings /	No											-
structures												
of cultural												
significan												
ce		No	No	No	No	No	No	No	No	No	No	
Areas	No											-
attached												
to oral												
traditions /												
intangible												
heritage		No	No	No	No	No	No	No	No	No	No	
Historical	No											-
settlement												
/												
townscap												
es		-	-	-	-	-	-	-	-	-	-	
Landscap	No	-	-	-	-	-	-	-	-	-	-	-
e of												
cultural												
significan												
се												

NHRA	ELE-	INDICATORS OF HERITAGE SIGNIFICANCE					RISK					
S (3)2	MENT	Hist	Rar	Sci	Турі	Tech	Aest	Pers	Land	Mate	Sustain	
Heritage	S	oric	е	ent	cal	nolo	hetic	on	mark	rial	ability	
resource		al		ific		gical		/com		cond		
category								muni		ition		
								ty				
Geologica	No	-	-	-	-	-	-	-	-	-	-	-
I site of												
scientific/												
cultural												
importanc												
е												
Archaeolo	Potsher	-	-	-	-	-	-	-	-	-	-	Out of
gical /	ds /											context
palaeontol	stone											and not
ogical	tool											significant
sites												
Grave /	No	-	-	-	-	-	-	-	-	-	-	-
burial												
grounds												
Areas of	No	-	-	-	-	-	-	-	-	-	-	-
significan												
ce related												
to labour												
history												
Movable	No	-	-	-	-	-	-	-	-	-	-	-
objects												

• Summarised recommended impact management interventions

NHRA	SITE	IMPACT		Impact	Motivation
S (3)2 Heritage		SIGNIFICANCE Cultural significance		manage- ment	
resource		Cultural	Impact		
category		significan	significance		
Buildings / structures of cultural significance	No	No	None	-	-
Areas attached to oral traditions / intangible heritage	No	None	None	-	-
Historical settlement/ townscape	No	None	None	-	-
Landscape of cultural significance	No	None	None	-	-
Archaeologi cal sites	No	None	None	-	Fragments of potsherds and one stone implement has no significance
Grave / burial grounds	No	No	None	-	-

NHRA S (3)2 Heritage	SITE	IMPACT SIGNIFICANCE Cultural significance		Impact manage- ment	Motivation
resource category		Cultural significan	Impact significance		
category		Significan	Significance		
Areas of	No	None	None	-	-
significance					
related to					
labour					
history					
Movable	No	None	None	-	-
objects					

ACT	COMPO- NENT	IMPLICATION	RELEVANCE	COMPLIANCE
NHRA	S 34	Impact on buildings and structures older than 60 years	None present	None
NHRA	S35	Impacts on archaeological heritage resources	Fragments of potsherds and one stone tool	Material is out of context and of no significance
NHRA	S36	Impact on graves	None present	None
NHRA	S37	Impact on public monuments	None present	None
NHRA	S38	Developments requiring an HIA	Development is a listed activity	Full HIA in done
NEMA	EIA regulation s	Activities requiring an EIA	Development is subject to an EIA	HIA is part of EIA

G. STATEMENT OF SIGNIFICANCE & EVALUATION OF HERITAGE RESOURCES

Section 38 of the NHRA, rates all heritage resources into National, Provincial or Local significance, and proposals in terms of the above is made for all identified heritage features.

Evaluation methods

Site significance is important to establish the measure of mitigation and / or management of the resources. Sites are evaluated as *HIGH* (*National importance*), *MEDIUM* (*Provincial importance*) or *LOW*, (*local importance*), as specified in the NHRA. It is explained as follows:

National Heritage Resources Act

The National Heritage Resources Act no. 25, 1999 (NHRA) aims to promote good management of the national estate, and to enable and encourage communities to conserve their legacy so that it may be bequeathed to future generations. Heritage is unique and it cannot be renewed, and contributes to redressing past inequities.⁶⁰ It promotes previously neglected research areas.

All archaeological and other cultural heritage resources are evaluated according to the NHRA, section 3(3). A place or object is considered to be part of the national estate if it has cultural significance or other special value in terms of:

- (a) its importance in the community, or pattern of South Africa's history;
- (c) its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;(g) its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons; (h) its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa. ⁶¹

⁶⁰National Heritage Resources Act, no. 25 of 1999. p. 2.

⁶¹National Heritage Resources Act, no. 25 of 1999. pp. 12-14

The following was archaeological material was observed in the study area:

• The significance and evaluation of the archaeological and cultural heritage features:

The significance and evaluation of the archaeological and cultural heritage features can be summarized as follows:

• ARCHAEOLOGICAL / HERITAGE FEATURES:

Site	Cultural Heritage Features	Significance	Measures of
			Mitigation
	OUTSIDE STUDY AREA	NONE	No mitigation measures
Clay potsherds:	Fragments of decorated and		are proposed: Pottery
(Close to Staff	undecorated clay potsherds of		was not found in any
Housing -	various sizes and colours (figs.		context & were
historically	5 - 8).		observed outside of the
disturbed land)			study area (next to
			access road / disturbed
			area).
Middle Stone Age	INSIDE STUDY AREA	NONE	No mitigation measures
Round Scraper	A single round scraper dated		are recommended - as
(Found at site for	from the Middle Stone Age		the stone artefact was
Lodge Unit 5)	(MSA) was observed in the		found in isolation, and
	access road for the proposed		not in any
	Lodge Unit 5. It is in close		archaeological context.
	vicinity of the non-perennial		
	stream. This stone implement		
	is not associated with any		
	archaeological context (fig.		
	24).		

H. RECOMMENDATIONS & CONCLUSION

Archaeological / Heritage features:

A few fragments of clay potsherds which may be associated with the Late Iron Age, were observed outside of the study area. The clay potsherds in particular are all small fragments as they were found in historically disturbed agricultural lands (figs. 5 - 8). None of these features are within an archaeological context and they have already been impacted upon by historical agricultural development. There is no cultural value to these objects which could link them as of outstanding importance to a certain community (NHRA 3.3a); or its potential to yield social,

cultural or spiritual information or to link it to a particular community which may contribute to an understanding of South Africa's cultural heritage (NHRA 3.3c & g).⁶² No mitigation measures are recommended.

The single stone implement, (round scraper), dating from the MSA was observed on an access road for the proposed Lodge Unit 5, which is a disturbed area (fig. 24). There is no cultural value to the stone implement as it is not within any archaeological context which could link it as of outstanding importance to a certain community (NHRA 3.3a); or its potential to yield social, cultural or spiritual information or to link it to a particular community which may contribute to an understanding of South Africa's cultural heritage (NHRA 3.3c & g). No mitigation measures are recommended. The proposed development will have no impact on this object.

No other archaeological or historical material, structures, features or graves were observed during the survey for the proposed staff housing and Lodge development. Archaeological material or graves are not always visible during a field survey and therefore some significant material may only be revealed during construction activities of the proposed development. It is recommended that the applicant should be made aware that distinct archaeological material or human remains may only be revealed during the construction phase of the proposed development.

Based on the survey and the findings in this report, Adansonia Heritage Consultants state that there are no compelling reasons which may prevent the proposed development to continue. It is recommended that any earthmoving activities be monitored by a qualified archaeologist and that an assessment and recommendation be done should any archaeological material or graves be found.

Adansonia Heritage Consultants cannot be held responsible for any archaeological material or graves which were not located during the survey.

⁶² National Heritage Resources Act, no. 25 of 1999.

⁶³ National Heritage Resources Act, no. 25 of 1999.

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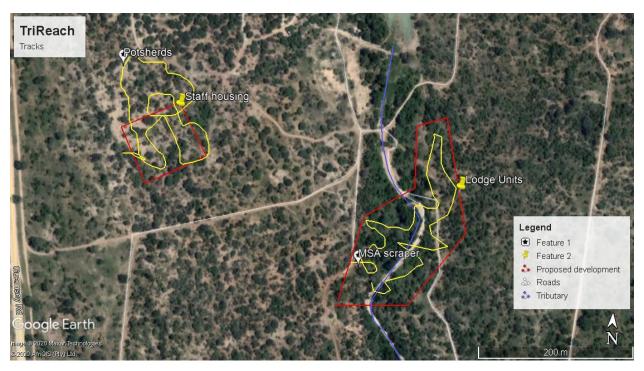
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APPENDIX 1 TRACKS AND PATHS



Tracks and Paths used to access the study area.