

A HERITAGE IMPACT ASSESSMENT STUDY FOR THE PROPOSED PROVISION OF BULK WATER SUPPLY FROM RUST DE WINTER DAM TO MATHANJANA MAGISTERIAL DISTRICT, LIMPOPO/MPUMALANGA PROVINCES, SOUTH AFRICA.



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#### DECLARATION OF INDEPENDENCE

This report has been compiled by Nkosinathi Tomose, leading archaeologist and heritage consultant for NGT Project & Heritage Consultants. The views expressed in this report are entirely those of the author and no other interest was displayed during the decision making process for the project.

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#### EXECUTIVE SUMMARY

NGT Projects & Heritage Consultants (Pty) Ltd has been appointed by GKB Design Associates (Pty) Ltd on sub-consultancy basis as an independent and lead CRM firm to conduct an HIA (exclusive of Palaeontological desktop study) for the proposed provision of bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District , Limpopo/Mpumalanga Provinces, South Africa. The study forms part of specialists (inputs) impact assessment studies required to fulfil the EIA process and its requirements as well as acquisition of Environmental Permits. The appointment of NGT Projects & Heritage Consultants (as an independent CRM firm) is in terms of the NHRA, No. 25 of 1999 (as amended), the NEMA, No.107 of 1998 (as amended & the applicable 2010 Regulations). Nkosinathi Tomose, the lead archaeologist & heritage consultant of NGT Projects & Heritage Consultants, conducted the HIA study for the proposed provision of bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District , Limpopo/Mpumalanga Provinces, South Africa. He was assisted in this regard (field logistics) by Ms Thandeka Mngadi from NGT Group of companies.

The study identified 5 sites along the proposed bulk supply water pipeline route/servitude. The sites include 1 burial ground and grave site (MMD-1) and 4 built environment and landscape features (MMD-2, MMD-3, MMD-4 and MMD-5). The following conclusions and recommendations are made about the proposed provision of bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District , Limpopo/Mpumalanga Provinces based on existing literature about the project area, observations made during the physical survey of the proposed development area, assessment and evaluation methods using SAHRA minimum standards for evaluation and grading of archaeological (and other heritage) resources as well as the NHRA, No 25 of 1999 for the protection, conservation and management of the Nation Estate (Section 3 of the NHRA, No 25 of 1999), and assessment of associated impacts in term of the BAR Assessment Standards translated to suite the EIA requirement:

- It is concluded the proposed development will have minimum impact on the cultural environment in MMD. The only impact to the cultural environment that will occur is the potential destruction of a single grave (MMD-1) (Figure 12 & 17).
- This grave will need to be mitigated by fencing it off from the construction activities or relocating it.
- It recommended that a Phase II plan of study should be developed for the single grave located in close proximity to Masobe Village (Figure 17).
- The most viable and suitable mitigation measure for this grave is to fence it off from the construction activities and develop a grave management plan to manage it during the

construction and post construction phase of the project (during pipeline maintenance). there

• It is further recommended that SAHRA should grant a positive Review Comment for the project, provided that the client agrees to implement the recommendations of this HIA.

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## ABBREVIATIONS

Acronyms	Description
AIA	Archaeological Impact Assessment
ASAPA	Association of South African Professional Archaeologists
ARCH	Archaeological
BEL	Built Environment & Landscape
BGG	Burial Grounds & Graves
BGG?	Proven not to be Burial Ground & Grave
CRM	Cultural Resource Management
DEA	Department of Environmental Affairs
DoE	Department of Energy
EIA practitioner	Environmental Impact Assessment Practitioner
EIA	Environmental Impact Assessment
ESA	Early Stone Age
GIS	Geographic Information System
GPS	Global Positioning System
HIA	Heritage Impact Assessment
I&AP	Interested & Affected Party
К.у.а	Thousand years ago
MPHRA	Mpumalanga Province Heritage Resources Authority
LSA	Late Stone Age
LIA	Late Iron Age
MSA	Middle Stone Age
MIA	Middle Iron Age
MMD	Mathanjana Magisterial District
NERSA	National Energy Regulator of South Africa
NHRA	National Heritage Resources Act
NEMA	National Environmental Management Act
PHRA	Provincial Heritage Resources Authority
PSSA	Palaeontological Society of South Africa
ROD	Record of Decision
RBIG	Regional Bulk Infrastructure Grant

RBWSIP	Regional Bulk Water Services Infrastructure Programme
PDAFP	Proposed Development Area Footprint
SADC	Southern African Development Community
SAHRA	South African Heritage Resources Agency
SPV	Special Purpose Vehicle

#### TERMS & DEFINITION

#### Archaeological resources

#### This includes:

- material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years including artefacts, human and hominid remains and artificial features and structures;
- rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- wrecks, being any vessel or aircraft, or any part thereof which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the republic as defined in the Maritimes Zones Act, and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation;
- Features, structures and artefacts associated with military history which are older than 75 years and the site on which they are found.

#### Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance

#### Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in the change to the nature, appearance or physical nature of a place or influence its stability and future well-being, including:

- construction, alteration, demolition, removal or change in use of a place or a structure at a place;
- carrying out any works on or over or under a place;
- subdivision or consolidation of land comprising a place, including the structures or airspace of a place;
- constructing or putting up for display signs or boards;
- any change to the natural or existing condition or topography of land; and
- any removal or destruction of trees, or removal of vegetation or topsoil

### Heritage resources

This means any place or object of cultural significance

#### 1. INTRODUCTION

#### 1.1. Project Background

#### 1.1.1. Summary of the Proposed Project

This project is one of Rand Water projects as the Department Water Affairs (DWA) Implementing Agent (IA) for the Regional Bulk Infrastructure Grant (RBIG) under a programme called Regional Bulk Water Services Infrastructure Programme (RBWSIP). In year "2007 the National Treasury (NT) approved funding for a three year programme called Regional Bulk Infrastructure Grant (RBIG). This programme has been subsequently extended and is an ongoing programme where the wider scope of all the regional bulk water supply management requirements was consolidated. It has been decided that all the regional bulk infrastructure roles and functions will merge under one programme, named Regional Bulk Water Services Infrastructure Programme (RBWSIP). The aim of the fund is to support Government's development targets where in this project is to supply a regional bulk infrastructure eradication of basic water supply backlogs" (GKB Design Associates, 2013: 9). GKB Consulting Engineering was appointed the Rand Water to undertake an investigation into the provision of bulk water supply to Mathanjana Magisterial District (MMD) (Figure 1). The investigation addressed the bulk infrastructure requirements necessary for sourcing water from the Rust de Winter Dam, its treatment and distribution to the respective villages of the MMD. In summary the current project involves provision of bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District, Limpopo/Mpumalanga Provinces, South Africa (Figure 2). This HIA study form part of specialists studies aimed at giving inputs into the EIA process and advising on the best management measures for heritage resources along the proposed bulk water supply pipeline route in terms known heritage resources management measures.

#### 1.1.2. Proposed Project Aims

The aim of the project is to provide bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District, Limpopo/Mpumalanga Provinces, South Africa. In line with the overall project aims, the objective of the current study (HIA) is to advise the EIA process, GKB Design Associates subsequently Rand Water on how to manage and mitigate heritage resources yielded by the physical survey of the proposed development area from Rust De Winter Dam to

MMD where it ends in Masobe village. It also advises on the measures to use during the construction and operational phase of the project for the management of the cultural environmental along the proposed bulk water supply route from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces. In the EIA process, this HIA study aims to contribute to the development of the EIA document through assessing and evaluating impacts that affect or have the potential to impact on the cultural environment.

1.1.3. Terms of Reference for the Appointment of Archaeologist and Heritage Specialist

Because of the nature and size of the proposed development - proposed bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces and associated infrastructure exceeding a total area of 5000m<sup>2</sup>, and a pipeline exceeding 300m an EIA process is being conducted and the current HIA feeds into it. In terms of the EIA Regulations of June 2010 (Government Notice 543-546 published in terms of the NEMA, No 107 of 1998) the construction of the proposed facility is listed as an activity that requires environmental authorisation. Undertaking of the EIA process is therefore a requirement. The current EIA process involves the identification and assessment of environmental impacts through specialist studies.

NGT Projects & Heritage Consultants has been appointed by GKB Design Associates on subconsultancy basis as an independent and lead CRM firm to conduct an HIA (exclusive of Palaeontological desktop study) for the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa. The study forms part of specialists (inputs) impact assessment studies required to fulfil the EIA process and its requirements. Nkosinathi Tomose, the lead archaeologist & heritage consultant of NGT Projects & Heritage Consultants, conducted the HIA study for the proposed project and he was assisted in this regard (field logistics and supplies) by Miss Thandeka Mngadi from NGT Group of companies.

The appointment of NGT Projects & Heritage Consultants (as an independent CRM firm) is in terms of the Section 38 of the NHRA, No. 25 of 1999 (as amended) and the NEMA, No.107 of 1998 (as amended & the applicable 2010 Regulations).





Figure 1-Location of Mathanjana Magisterial District, Limpopo/Mpumalanga Provinces, South Africa.



Legend Bend narke Main Reads Pipe Rode Notional Reads Hodenys Provideance Secondary Roads	SITE PLAN: Topographic Map of Pipe Rout	

Figure 2- proposed bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District , Limpopo/Mpumalanga Provinces, South Africa.

## 2. BACKGROUND OF THE STUDY AREA

## 2.1. Description of the affected environment

Table 1 - Mathanjana Magisterial District , Limpopo/Mpumalanga Provinces, South Africa

Location	• Mathanjana Magisterial District , Limpopo/Mpumalanga Provinces,
	South Africa (Figure 1).
	• It is located within the Highveld (Figure 10)
Study Site Land	Government: Rust De Winter Dam (Figure 3, 8 & 9)
Uses	Government Parastatal: : Eskom power line (Figure 4)
	• Private: Game farming and cattle ranching (Figure 3).
	• Communal and tribal: village settlements and subsistence farming
	(Figure 3)
	• As result of the above land use activities the route of the proposed
	bulk water supply from Rust De Winter Dam to Mathanjana
	Magisterial District, Limpopo/Mpumalanga Provinces run along
	already disturbed areas or along existing roads.
Land Owner(s)	Government Parastatal - Rand Water
	Private - Game Farmers
	Tribal- Villages
Applicant	GKB Design Associates (Pty) Ltd on behalf of Rand Water
Proposed	• Provision of bulk water supply from Rust De Winter Dam to
Development	Mathanjana Magisterial District, Limpopo/Mpumalanga Provinces
	South Africa (e.g. Figure 2 & 17)
Access	• Existing national, provincial and local roads, routes and human
	foot paths.
	• The study area is ensconced between the following major
	roads: east of the R101 or the N1 to Polokwane, south of te
	R516 and north of the R568 (Figure 1)
Defining natural	A major water dams are found south and east of Mathanjana
features	Magisterial District and they include: Rust Van Winter Dam
	(south-west) and Rhenosterkop Dam (east) (Figure 1 & 3).
	• The Eiland River is a major river that runs south of Mathanjana
	Magisterial District (e.g. Figure 10).

now operation plough-fields, game farms and grazing fields and
settlement/residential areas (Figure 3)







Figure 3- Location of proposed bulk water supply from Rust De Winter Dam to Mathanjana Magisterial District. Red arrows show areas with game farms or private land, yellow arrows areas - communal or tribal land, green arrow plough fields- private land. Rust De Winter is also shown.



Figure 4- Eskom Powerline



Figure 5- Existing water distribution feeder points in Masobe Village



Figure 6- Old water supply infrastructure which include borehole and water reserve tanks



Figure 7- Existing water pump valves at Rust De Winter Dam



Figure 8- General view Rust De Winter Dam



Figure 9- Dam wall and discharge Rust De Winter Dam

# 2.2. Description of proposed activities: Infrastructure Proposed

#### Table 2 - List of Activities

Activity 1	Construction of a bulk water supply and associated infrastructure
	Construction water distribution pipeline to supply the different
	villages with the Mathanjana District
Activity 2	Clearing pipeline route, road and stabilizing the land to support the
	proposed bulk water pipeline
	Excavation to installation

## 2.3. Needs & Desirability

Table 3 –List of activities in-line with the project scope

Activity 1	• Desktop study of the heritage value and integrity of the area under
	consideration and its surrounding with a particular focus on heritage resources
	within and along the proposed pipeline route (refer to 2.4 below for detailed
	overview of resources in the region under consideration).
	• Physical identification, documentation and recording of heritage resources
	within and immediately outside the proposed pipeline route, Mathanjana
	District, Limpopo/Mpumalanga Provinces as part the EIA process
Activity 2	• The mapping, assessment and evaluation of the heritage value and integrity of
	the identified heritage resources and assessment of potential impacts as a result
	of the proposed development on these resources.
Activity 3	Proposing heritage management measures for inclusion in the EIA document
	• Making recommendations to SAHRA and provincial heritage resources authority
	- MPHRA and LIHRA

2.4. Desktop Study: Archaeological and Heritage:

South Africa is rich in diverse forms and types of heritage, ranging from natural to cultural heritage. The natural includes among other things: Geological, Palaeontological, and the various plant and animal species that define the country. The cultural heritage, which dates as far back as 2.5 million years ago (m.y.a), includes - the different periods of Stone Age Archaeology, the Iron Age Archaeology, Historical and Industrial Archaeology, as well as the "Political/Historic" geographies of South Africa.

#### 2.4.1. Stone Age Archaeology:

The Stone Age Archaeology of South Africa is divided into three categories, namely: the ESA, MSA and the LSA. These Stone Age industries are well documented throughout southern Africa regions including the Limpopo province where the current study is located. Below are detailed summaries of the traits that characterises each industry artefact and/or material culture as well as the types of industries dominant in the province.

ESA – Early Stone Age:

The ESA is dated between 2.5m.y.a and 250 k.y.a (thousand years ago) – during this period predecessors of Homo Sapien Sapiens started making stone artefacts. The earliest known Stone Age industry is referred to as the Olduwan Industry. It derives its name from the first known Stone Age industry recorded in Olduvia Gorge, Tanzania north-east Africa. Stone artefacts associated with this industry are often described as crude and rudimentary in making – they define the earliest form of Stone Age technological innovation. The Olduwan is replaced, in the archaeological records, by the Acheulian Industry some 1.5 m.y.a. The Acheulian is characterised by large cutting tools (also referred to as bifaces) - hand axes and cleavers are the dominant forms of artefacts found in this industry.

Other ESA tools which form part of what is called the Victoria West Stone Industry in regions such as the Free State and Northern Cape include: hand axes and what Smith refers to as 'Tortoise Cores' (Smith, 1920; R. A., Smith in 1915). This was probably Smith reference to the peculiar feature or morphology of Prepared Cores – where different pieces of where chipped off from a single piece of parent material to make way for the ultimate removal or

shaping of a specific tool and most likely a well defined hand axe. A. H. J., Goodwin (1935) defines the Victoria West Industry with and without cores. Meaning that hand axes and cleavers could have been produced without necessarily having to prepare a parent material to a point to which a single definable tool could be produced. The absence of prepared cores in relation to hand axes and cleaver did not mean the end to this stone tool manufacturing techniques for it become a dominant and defining feature towards the end of the ESA into the MSA. What first became known as 'Tortoise Cores' was later defined as the transition marker between the ESA and the MSA. Therefore, the Prepared Cored of the Victoria West industry can be taken as the markers of transitional period in the Stone Age industry from Acheulian into the MSA, a second clearly defined phase in Stone Age technological innovation. Lycett (2009) sees the Victoria West as an evolutionary step towards the Levallois Prepared Core Technique which signifies the outwards spread of the Stone Age technology. Such technological innovation within the ESA is also endemic in the Limpopo Province and part of the Mpumalanga Province towards the escarpment. There are, however, no known sites of early stone age within the vicinity of the study area.

MSA – Middle Stone Age:

The MSA stone artefact replace the dominant large and often imposing hand axes and cleavers that characterise the ESA. Such a distinction or transition in archaeological records has this far be dated to 250 k.y.a. During this period, smaller artefacts define the archaeological records and the most dominant ones are flake and blade industry. This period has been defined by some in archaeological circles as a period that signifies a secondary step towards the modern human behaviour through technology, physical appearance, art and symbolism (e.g. Binneman et al. 2011). This industry innovation is suggested to have been at its most highest during the last 120 k.y.a. With surface scatters of the flake and blade industries found throughout the southern Africa regions (Thompson & Maream, 2008). They often occur between surface and approximately 50-80cm below ground. Fossil bones may be associated with the MSA in some sites. The flakes and blade industries are often found in secondary context as surface scatters and occurrence like their predecessor industries. Malan (1949) defines the earliest MSA stone industry as the Mangosia and its distribution stretching across the Origualand in Northern Cape, Natal, the Cape Point, the Free State. The Prepared Core Technique which had become the defining technological technique of the MSA is in this industry replaced by the Micro Lithics that become a dominant feature or trait in the LSA. They mostly occur as surface scatter.

The MSA tools include flakes, blades and points. Their time sequence is often not known because they mostly occur in surface. Other industries within the MSA include:

- The Howieson's Poort which is known to have wide distribution throughout southern Africa
- The Orangia 128 to 75 k.y.a.
- Florisbad and Zeekoegat industries dated between 64 and 32 k.y.a

In the central provinces such as Mpumalanga, Gauteng and the Free State most of the MSA stone artefacts are made from the following materials: fine grain quartzite, quartz, silcrete, chalcedony and hornfels (Binneman et al. 2011, see also Binneman et al. 2010a). Like the ESA artefacts, the MSA stone artefacts occur in secondary context owing to a variety of reasons. One is due to natural events and/or activities such as erosion and being wash down by water and/or riverine activities, animal and human disturbances etc. It would, therefore, be in the best interest of the author (or archaeologist and/or heritage consultant) to pay special attention to exposed surfaces, disturbed pieces of land and along any gullies and hill foot slopes, drainage lines etc during the survey process.

### LSA – Late Stone Age:

The LSA spans a period from 30 k.y.a to the historical time i.e. the last 500 years to 100 years ago. It is associated, in archaeological records, with the San hunter-gathers. This is particular important for the last 10 k.y.a whereby the San material culture dominates the archaeological records -mostly in rock shelters, caves as well as open air sites in both the interior and coastal regions. However, the San open air sites are not always easy to find because they are in most cases covered by the various forms and types of vegetation and the other contributing factor is the mobility nature of these people. They were not sedentary communities like their counterparts - e.g. the Iron Age people/communities who needed to settled the land for ploughing, grazing etc. In the coastal regions, sand dunes sometimes become impediments in locating LSA sites. Owning to all these factors the preservation state of the LSA archaeology is often poor and not easily disenable (e.g. Deacon & Deacon 1999). Caves and rock shelters provide a more substantial preservation record of pre-colonial record of indigenous people's archaeology. This is in a form of stone artefacts, rock art and other material culture such as beads etc. The LSA archaeology was, however, not only dominated by the San hunter-gathers - in about 2 k.y.a the southern Africa landscape is known to have also been penetrated and occupied by the

Khoekhoe pastoralists/herders who introduce sheep and cattle (e.g. Hall & Smith, 2000). Sites that document the existence of Khoekhoe herders in South African landscape Ceramic vessels are some of the material culture that signifies the Khoekhoe material culture in archaeological records - including the depiction of sheep and cattle often found in San huntergather rock art (ibid). Smith and Hall (2000) give detailed descriptions of potential relations that could have taken place between the San, the Khoekhoe and later the Iron Age farmers in Little Mock - an archaeological interaction sites located in the Limpopo Province near the Soutpansberg Mountain north east of the current study geography. In their study, Smith and Hall, argue that the material culture of the Khoekhoe herders included among other things the art of making rock art in form of geometrics, concentric circles etc. Binneman (et al. 2011) asserts that the diet of this new group of people would have also included muscle collected along the muddy river banks, coastal line and riverine and terrestrial foods. Other than the material culture such as artefacts found within the LSA industries, burials or human remains become dominant in the landscape. In the coast they are often found buried underneath middens (dumpsites) (e.g. Deacon & Deacon 1999). While in the interior (such as Mpumalanga) and the northern regions such as the Limpopo Province they are sporadic and can occur across various features in the landscape.

The LSA archaeology is therefore rich and varied consisting of stone artefacts, other forms of material cultures such as beads (ostrich egg shell beads are dominant), pottery, rock art in form of paintings and engravings with engraving dominating the central low land and the interior regions. Engravings are also found spread across the Highveld and central regions such as the North West Province, the Free State Province and the Cape provinces such as the Northern Cape - better known to archaeologist as the "Mecca" of engravings sites in South Africa and most probable in southern Africa. Among stone tools found in this period include, continuation of bifaces (e.g. hand axes), but they now become supplemented by tanged barbed arrow heads made from the various materials found with the southern Africa regions.

#### 2.4.2. Iron Age Archaeology:

The Limpopo Province is probably one of the well researched and documented regions of South Africa in term of Iron Age archaeological research. Like the Stone Age archaeology, in the Limpopo Province (and few other South African province) this period in archaeological records is divided into three categories, namely the EIA (Early Iron Age), MIA (Middle Iron Age) and

the LIA (Late Iron Age) (e.g. Huffman, 2005). While in regions such as the Free State Province there is no clearly defined MIA (e.g. Tomose, 2013).

The EIA communities first appear in southern African archaeological records in the 1<sup>st</sup> Millennium AD (Huffman 2007; van Schalkwyk, 2007). The eastern regions of the country were their preferred regions because of their rainfall patterns – summer rainfall climates conducive for ploughing and growing crops like maize, sorghum and millet. In the interior regions, the former Transvaal areas of Limpopo and Gauteng Province alike were preferred.

Other than rock art, stone walls and pottery – the material culture of the Iron Age communities also includes Iron Implements, traded beads, rainmaking site features, spear sharpening groves on rock surfaces, grinding stones etc (e.g. Huffman, 2007). Within the Mpumalanga province and along the same belt with the study area such sites are endemic in areas such as Machadodorp, Ladenburg and towards Steelpoort.

2.4.3. Historical Archaeology:

The Historical archaeology is a period in archaeological records that refers to the last 500 years in archaeological records. This period encapsulates the later parts of te Late Stone Age, Late Iron Age, and the period of European settlers and/or "colonist" in southern Africa. The archaeological records that characterises this period includes ruminants of Stone Age industries (and material culture), the Late Iron Age material culture (e.g. pottery/ceramics, iron age implements etc) and built environment (e.g. elaborate stone wall settlements etc) and the settlers material culture and built environment. In other regions of the country, settler towns become a dominant form of built environment and landscape features. The colonial, Union and the late political periods such as the Apartheid Era (as proclaimed in 1962) and the democratic South Africa have elements that could be associated with historical archaeology even though they are not necessarily over 60 or 80 years old. For example, requirements of an archaeologist intervention in dealing graves that are not located with municipality demarcated cemetery or in dealing with graves related to conflict such the liberation struggle or the different wars like the World War II.

#### 3. METHODOLOGY

#### 3.1. Legislative Requirements

The NEMA, No. 107 of 1998 stipulated that for any development in South African to be granted permission to go ahead an assessment of the potential impacts of the proposed development on both the natural and cultural environment should be conducted. As such, this HIA fulfils the requirements of NEMA (and the applicable 2010 EIA Regulations) and is conducted in-line with Section 38 (1) of the NHRA, No. 25 of 1999.

### 3.2. Methodology

This chapter outline the methodologies used in conducting this study. This HIA report was compiled by Nkosinathi Tomose, lead archaeologist and heritage consultant for NGT Projects & Heritage Consultants for the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa. It does this in order to adhere to the Terms of Reference provided by the client for the completion of this report. Some areas of the report follow minimum standards for completion of professional HIA as stipulated in SAHRA minimum standard (2012) such as detailed account to the archaeological and historical background of the study area or region. This is also

3. 2.1. Step I – Literature Review (Desktop Phase):

- The background information search of the proposed study area included the following sources:
  - Published academic papers and HIA studies conducted in and around the region where the current development will take place.
  - o Mpumalanga online
- There was limited use of archival maps two historical maps and one general travel map showing the proposed area of development and its surround were assessed to aid information about the proposed area of development and its surrounding.
- This also included a review and assessment of relevant environmental and heritage legislations such as the NEMA (together with the 2010 EIA Regulations) and the NHRA.

#### 3.2.2. Step II – Physical Survey:

The physical survey of the study area aimed to address the following main areas of concern raised by the client in the specialist Terms of Reference:

1. To "conduct an onsite verification for the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa";

2. To "identify all objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located in and around the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa". Use will be made of annotated maps where appropriate"

In order to address these concerns by the client: -

- The physical survey of the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa was conducted by a qualified archaeologist and general heritage specialist from NGT Projects & Heritage Consultants between the 15 and 17 November 2013.
- The survey covered the proposed bulk water supply pipeline routes (and the potential water distribution ports with the village) from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa on foot and track logs of the "walk down" were recorded using Garmin GPSmap 62s.
- The objective of the survey was to locate and identify archaeological and heritage resources and/or sites and objects, occurrence within the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa. To record and map them using necessary and applicable tools and technology.
- The physical survey was deemed necessary based on the known occurrence of archaeological resources within the broader Highveld region.
- The survey also paid special attention to disturbed and exposed layers of soils as such as eroded surfaces because these areas are more likely to exposed or yield archaeological and other heritage resources that may be buried underneath the soil and be brought to the earth surface by animal and human activities such as animal barrow pits and human excavated grounds. The edges/sides of dirty roads were also inspected for possible Stone Age scatters as well as exposed Iron Age implements and other resources.
- The following technological tools and platforms were deemed important for documenting and recording located and/or identified sites:
  - Garmin GPSmap 62s to take Lat/Long coordinates
  - DELL Notebook aided with Garmin Basecamp Software, Google Earth to plot the propose bulk water supply pipeline in MMD.
  - ArcGIS was used to plot all the identified heritage resources and to develop heritage map in order to inform the heritage analysis of the resources found along the bulk water pipeline supply route from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa.
  - Maps provided by the client before the survey also proved invaluable
  - Shapefiles (KMZ files) developed by NGT based pipeline route points provided by client were used
  - A Garmin GPS with camera and Samsung camera were use to take photos of the affected environment and the identified heritage sites.

3.2.3. Step III – Data Consolidation and Report Writing:

During field work and on the return from the field the following clients concerns were addressed: -

1. To "assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value"

2. To "describe the possible impact of the proposed development on these cultural remains, according to a standard set of conventions;

3. To "propose suitable mitigation measures to minimize possible negative impacts on the culturalresources;

4. To "prepare an heritage resource management plan"

 "Review applicable legislative requirements" - <u>Section 3.1. of this Chapter ( i.e. Chapter 3)</u> addresses this concern as well as Section 5.5 of Chapter 5 discusses Sections of the NHRA, No. <u>25 triggered by the current study findings</u>

6. To ".....highlight assumptions, exclusions and key uncertainties". <u>Chapter 4 (below) of this</u> report address this concern.

- The final step involved the consolidation of the data collected using the various sources as described above.
- This involved the manipulation Shapefiles/KML files through ArcGIS
- Assessing the significance and potential impact of the identified sites, discussing the finds, report writing and making recommendation on the management and mitigation measures of the identified sites and resources as well as the impact and influence of these sites and resources on the proposed corridor.

3.3. Assessment of Site Significance in Terms of Heritage Resources Management Methodologies

The significance of heritage sites was based on four main criteria:

- Site integrity (i.e. primary vs. secondary context)
- Amount of deposit, range of features (e.g., stonewalling, stone tools and enclosures)
  - o Density of scatter (dispersed scatter)
  - o Low  $<10/50m^{2}$
  - o Medium 10-50/50m<sup>2</sup>
  - o High  $>50/50m^2$
- Uniqueness and
- Potential to answer present research questions.

Management actions and recommended mitigation, which will result in a reduction in the impact on the sites, will be expressed as follows:

- A No further action necessary;
- B Mapping of the site and controlled sampling required;
- C No-go or relocate pylon position
- D Preserve site, or extensive data collection and mapping of the site; and
- E Preserve site
- Impacts on these sites by the development will be evaluated as follows:

Measure of Heritage Sites Significance

The following site significance classification minimum standards as prescribed by the SAHRA (2006) and approved by the ASAPA for the SADC region were used for the purpose of this report.

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

Table 4:	Site	significance	classification	standards a	as pre	escribed by	/ SAHRA

3.4. Methodology for Impact Assessment in terms of Environmental Impact Assessment Methodologies including Measures for Environmental Management Plan Consideration:

The Basic Assessment Methodology assists in evaluating the overall effect of a proposed activity on the environment. The determination of the effects of environmental impact on an environmental parameter is determined through a systematic analysis of the various components of the impact. This is undertaken using information that is available to the environmental practitioner through the process of the Basic Assessment & Environmental Impact Assessment. The impact evaluation of predicted impacts was undertaken through an

assessment of the significance of the impacts. This is in line with specialist requirements as required by the client. For example, the request that:-

"The impact methodology [should] concentrate on addressing key issues. This methodology to be employed in the report thus results in a circular route, which allows for the evaluation of the efficiency of the process itself. The assessment of actions in each phase [that should] be conducted in the following order:

- Assessment of key issues;
- Analysis of the activities relating to the proposed line corridor, pylon locations;
- Assessment of the potential impacts arising from the activities, without mitigation, and
- Investigation of the relevant mitigation measures.

Because, "activities within the framework of the proposed line corridor give rise to certain impacts". The client recommended that, "for the purposes of assessing these impacts, the project has [to be] divided into two phases from which impact activities can be identified, namely:

- the Construction Phase
- and Operational Phase

The following Assessment Criteria is Used for Impact Assessment

An impact can be defined as any change in the physical-chemical, biological, cultural and/or socio-economic environmental system that can be attributed to human activities related to alternatives under study for meeting a project need.

The significance of the aspects/impacts of the process will be rated by using a matrix derived from Plomp (2004) and adapted to some extent to fit this process. These matrixes use the consequence and the likelihood of the different aspects and associated impacts to determine the significance of the impacts.

The significance of the impacts will be determined through a synthesis of the criteria below:

Probability: This describes the likelihood of the impact actually occurring

Improbable: The possibility of the impact occurring is very low, due to the circumstances, design or experience.

Probable: There is a probability that the impact will occur to the extent that provision must be made therefore.

Highly Probable:It is most likely that the impact will occur at some stage ofthe development.

Definite: The impact will take place regardless of any prevention plans and there can only be relied on mitigatory measures or contingency plans to contain the effect.

Duration: The lifetime of the impact

Short Term: The impact will either disappear with mitigation or will be mitigated through natural processes in a time span shorter than any of the phases.

Medium Term: The impact will last up to the end of the phases, where after it will be negated.

Long Term: The impact will last for the entire operational phase of the project but will be mitigated by direct human action or by natural processes thereafter.

Permanent: The impact is non-transitory. Mitigation either by man or natural processes will not occur in such a way or in such a time span that the impact can be considered transient.

Scale: The physical and spatial size of the impact

Local: The impacted area extends only as far as the activity, e.g. footprint

Site: The impact could affect the whole, or a measurable portion of the above mentioned properties. Regional: The impact could affect the area including the neighbouring residential areas.

Magnitude/ Severity: Does the impact destroy the environment, or alter its function

Low: The impact alters the affected environment in such a way that natural processes are not affected.

Medium: The affected environment is altered, but functions and processes continue in a modified way.

High: Function or process of the affected environment is disturbed to the extent where it temporarily or permanently ceases.

Significance: This is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required.

Negligible: The impact is non-existent or unsubstantial and is of no or little importance to any stakeholder and can be ignored.

Low: The impact is limited in extent, has low to medium intensity; whatever its probability of occurrence is, the impact will not have a material effect on the decision and is likely to require management intervention with increased costs.

Moderate: The impact is of importance to one or more stakeholders, and its intensity will be medium or high; therefore, the impact may materially affect the decision, and management intervention will be required.

High: The impact could render development options controversial or the project unacceptable if it cannot be reduced to acceptable levels; and/or the cost of management intervention will be a significant factor in mitigation.

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

Sum (Duration, Scale, Magnitude) x Probability (Table -2)

S = Significance weighting; Sc = Scale; D = Duration; M = Magnitude; P = Probability

Table 5 - The significance weightings for each potential impact are as follows:

Aspec	Description	Weight
Probability	Improbable	1
	Probable	2
	Highly Probable	4
	Definite	5
Duration	Short term	1
	Medium term	3
	Long term	4
	Permanent	5
Scale	Local	1
	Site	2
	Regional	3
Magnitude/Severit	Low	2
	Medium	6
	High	8
Significance	Sum (Duration, Scale, N	Magnitude) x Probability
	Negligible	20
	Low	>20 40
	Moderate	>40 60
	High	>60

The significance of each activity was rated without mitigation measures (WOM) and with mitigation (WM) measures for both construction, operational and closure phases of the proposed development

To address the question of Heritage Management Plan the following table is used for Measures to be included in the EMP. This table is relevant in that it addresses key issues at the various stages of the project by also addresses how some of the key concerns that develop from a heritage point of view can be mitigated.

Table 6 -Measures for inclusion in the draft Environmental Management Plan:

OBJECTIVE: Description of the objective, which is necessary in order to meet the overall goals; these take into account the findings of the environmental impact assessment specialist studies

Project component/s	List of project components affecting the objective							
Potential Impact	Brief description of p	ootential environmenta	al impact if obj	jective is not r	met			
Activity/risk	Description of activit	ies which could impac	ct on achieving	, objective				
source								
Mitigation:	Description of the ta	arget; include quantit	ative measure	s and/or date	es of			
Target/Objective	completion							
Mitigation: Action/c	ontrol	Responsibility	Timeframe					
List specific action(s) required to meet		Who is responsible	Time	periods	for			
the mitigation	target/objective	for the measures	implementati	on of measure	es			
described above								
Performance	Description of key indicator(s) that track progress/indicate the							
Indicator	effectiveness of the management plan.							
Monitoring	Mechanisms for monitoring compliance; the key monitoring actions							
	required to check will	required to check whether the objectives are being achieved, taking into						
	consideration responsibility, frequency, methods and reporting							

## 4. ASSUMPTIONS, EXCLUSIONS AND UNCERTAINTIES

The following assumptions, exclusions and uncertainties exist in terms of the present study:

### 4.1. Assumptions -

- The current study is a Phase 1 Heritage Impact Assessment. As such, a historical and archival desktop study as well as a field survey were undertaken to identify tangible heritage resources located in and around the proposed development area footprint. The assumption is that a heritage social consultative process would have taken place with some of the locals or farm owners to uncertain known archaeological or heritage sites in their properties such as presence or existence of graves and cemeteries etc. However, there was no formal heritage social consultation that took place as part of the study this is due to the fact that nature of the current.
- The study assumes that the amount of heritage resources located in and around the propose bulk water supply route from Rust De Winter Dam to MMD represent the total amount of physical or tangible resources distributed in and around/along the propose pipeline route/servitude.

#### 4.2. Exclusions -

The following exclusions or limitations have direct consequence to the study and its results-

 The survey was conducted in November 2013, summer period - as such there was high level of vegetation cover for the archaeologist/heritage surveyor to pick up all the different archaeological and heritage features in the landscape such as unmarked graves, the different Stone Age, Iron Age and Historical Archaeology material culture and artefacts. This forms one major limitation in terms of observing and recording all forms of archaeological and heritage sites in and immediately outside or along the proposed development line corridor servitude.

### 4.3. Uncertainties -

Heritage studies like most other specialist studies often experience many challenges during and after the physical survey of the proposed development area.

- From an archaeological and general heritage perspective the assumption is often made that, the amount of identified archaeological and heritage resources during physical survey of the proposed development area represent some of the total amount of resources that exist in and around or along the development area.
- This is not often true because the nature of some the archaeological and heritage resources some of these resources are subterranean in nature and as such, one cannot totally rule out their presence or existence along the propose pipeline route even though they are not recorded and map as part of the current study. These resources may be exposed or brought to the surface of the earth during the construction phase of the project which will involve excavation for land stabilization and clearing of vegetation and top soil.
- This presents one of the major uncertainties regarding the 'holistic' management or archaeological and heritage resources along the proposed line corridor servitude.
- Archaeologists and heritage specialists alike refer to discovery of such resources as chance finds and to mitigate such uncertainty - it is always advised that should such chance finds be made of archaeological and heritage resources or site the ECO should report them to the nearest SAHRA office or museum or call an archaeologist and heritage specialist to investigate the finds make necessary recommendations.

### 5. FINDINGS

The findings of this study are presented in three ways as per the search and other methodological methods used in conducting it. Such as desktop study, map and physical survey of the proposed pipeline route for the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa. Because there was no deeds search of the various properties and farms that the proposed bulk water pipeline is going to traverse - no deeds information is provided of the farms that the power line will pass.

5.1. Anticipated Heritage Resources and Sites within the proposed pipeline route for the proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa –

Based on the known archaeological and historical events that took place within these two regions - Limpopo and Mpumalanga Province. The following archaeological and heritage resources sites are anticipated to occur in areas that have less disturbance:

- Iron Age sites
- Burial grounds and graves
- Stone settlements and kraals
- Historical cemeteries and graves
- Historic houses/buildings
- Farming heritage resources

## 5.2. Results of Desktop Search-

The desktop search of the area revealed a number of things and activities that took place within the region - the literature review section above gives an accounts of this. Resources anticipated to be found mostly emanates from the findings of the Desktop Search. However, based on the age of the villages located in and around Mathanjana Magisterial District and the types of economic activities such as plough fields and game farms it is very unlikely that any archaeological and historical resources will be located in some parts of the pipeline route.

### 5.3. Historic Cadastral Search:

The following map of the study area was used to assess the evolutions of the landscape in and around the area in which the proposed bulk water supply will traverse:

• The third map is the 1905 Map illustrating the physical features of the Transvaal by Tudor G. Trevor - this map does not give detailed information - but shows that the study area is located in the Middle and High Veld. In terms of biodiversity and environment this is important as it would give information on the various natural environmental features.

 The map also shows that by 1905 there was already a railway line Pretoria and Warmbath (Bela Bela) and the railway system linking Pretoria, Middelburg, Belfast, Machadodorp up to Mozambique was also already developed. This line is associated with the NZASM railways encouraged by the Zuid Afrikaansche Republic government under president Kruger.



Figure 10-1905 Map illustrating the physical features of the Transvaal by Tudor G. Trevor, -F.G.S.A.R.S.M @ Trevor, 1906. The study is located between the Highveld and the Middle Veld.

5.4. Deeds Search:

No deeds search was conducted as part of the study.

5.5. Field Survey and Identified Archaeological/Heritage Resources:

A total of 5 heritage sites was yielded by the survey of the pipeline route for the propose provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa. The resources/sites included:

- A grave with brick dressing/mound
- Stone house foundations/ruins
- Reservoir (not a heritage site)
- Ruminants of a historic settlement site
- Ruminants of a historic wall

Site	MMD-1
Туре	Grave
Density	Single grave
Location/Coordinates	S25 12 04.2 E28 27 45.4
Approximate Age (More than 60 Or Less than	More than 60 years old
60 years old)	
Applicable Section of the NHRA, No 25 of	Section 36
1999:	
Description:	

The single grave is located exactly on the bulk pipeline water servitude or route on the border of farms Tamboottenpan 75 JR and Kliprand 76 JR. The grave has red brick dressing and is located within a game farm fence. It is in a typical burial position orientation - east-west (Figure 13). The grave show signs of recent visitation in a form of grave goods or material culture. A white enamel dish or plate was found.

Nature of Impacts, Assessments & Predictions in terms of Standard Heritage & Basic Assessment (i.e. adopted from Standard Environmentally Basic Assessment Guidelines):

Field	Grade	Impact	Impact	Heritage	Certainty	Duration	Mitigation
Rating			Significance	Significance	of		
					Impacts		
GP.A	-	Localised	High/Medium	High	Definite	Long-term :	Fence off the
				significance		Construction &	grave from the
						operational phases	excavation
							activities and
							diverted the
							pipeline. If
							the pipeline
							cannot be
							diverted-
							relocated the
							grave to
							formal
							cemetery

Nature: Construction activities (& development of associated infrastructure) will impact on the identified grave by destructing the grave markers, exposing the remains and creating access challenges for the relatives of the deceased. These are impact measures based on the worst case scenario where the grave is relocated.

	Without mitigation	With mitigation
Extent	High (5)	Medium (3)
Duration	Permanent (5)	Permanent (5)
Magnitude	Moderate (6)	Moderate (6)
Probability	Highly probable (4)	Highly probable (4)
Significance	(64) High	(56) Medium
Status (positive or negative)	Negative	Positive

Reversibility	Low	Medium
Irreplaceable loss of	Yes	No
resources?		
Can impacts be	Yes	
mitigated?		

Mitigation: The grave should be relocated into a municipal declared cemetery within MMD before the commencement of the project. Fencing of the grave can also provide a positive measure provided that the engineers agree to diverting the line. A permit should applied for with SAHRA BGG Unit to fence off the grave should it be retain and a permit should also be applied for with SAHRA BGG Unit should the grave be proposed to be relocated. A social consultation and public participation to involve family/ies or other Interested and Affected parties should also be undertaken in each of the above processes.

Cumulative impacts:

• Cumulative impacts regarding the grave and its management are predicated to result from the construction activities (& associated infrastructure development) and from the operational phase of the projects. The grave may be impacted by the proposed development activities.

Residual Impacts:

- Negative lasting impact to the grave
- Positive the project will bring water to MMD

Measures for inclusion in the draft Environmental Management Plan:

OBJECTIVE:

The overall goal is to identify, manage and conserve heritage resources within and immediately outside the development area for the propose provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa. In order to achieve this goal it is recommended that the single grave should be fenced off and the pipeline be diverted. Should this not be applicable the grave should be relocated to a municipal proclaimed cemetery within MMD prior to the commencement of development.

Project	Construction and operational phases of the project
component/s	
Potential Impact	In case where the identified grave is not fenced off or not relocated - the grave will be
	negatively impacted by the development. The construction activities will also cause
	destruction to the grave - destruction of grave markers/dressers making it difficult for

	the deceased families to recognise their graves resulting to legal disputes between the						
	developer and affected families).						
Activity/risk	Exclusion of the above objectives	from the overall Environmental	Management Plan				
source							
Mitigation:	The single grave should be fence	d off or be relocated prior to	the commencement of				
Target/Objective	development activities. Before the	nese processes a permit that a	ddressed the needs of				
	each mitigation measure should	be applied for with the relevar	nt heritage statutory -				
	the SAHRA BGG Unit. The dates	(e.g. days/months/years) for th	e project life span are				
	not yet known.						
Mitigation: Action/c	ontrol	Responsibility	Timeframe				
With the approval of	the project, the Environmental	Accredited archaeologist and	Prior to the				
Consultant should co	onsult an archaeologist/heritage	heritage consultant or CRM	construction and				
consultant to applied f	for a permit to fence off the grave	firm	operation phases of				
and develop a grave	management plan or a permit to		the project.				
relocate the grave in	the case where it is not deemed						
feasible to divert the	pipeline. The permit should be						
applied for with SAHRA	applied for with SAHRA BGG Unit.						
Performance	The type of indicator used here	will be Actionable Indicator	s – this will measure				
Indicator	action/progress in terms of compl	etion of the above objectives w	ith the approval of the				
	project against their actual implementation.						
Monitoring	With the approval of the project	t the Environmental Consultan	t and appointed ECO				
	should consult with the appointed	archaeologist/heritage consulta	ant to apply for permit				
	to fence off or relocated the affected grave.						



Figure 11- Single grave located within



Figure 12- Material culture associated with the grave

Site	MDD-2			
Туре	Old house foundations/ruins			
Density	1 structures			
Location/Coordinates	S25 13 40.8 E28 30 41.7			
Approximate Age (More than 60 Or Less than	More than 60 years old			
60 years old)				
Applicable Section of the NHRA, No 25 of	Section 34			
1999:				
Description:				
The site consists of stone house foundation (Figure 13). Next to the foundation is what looks to have				
be a sewer system manhole (Figure 13 -yellow arrow).				

# Nature of Impacts, Assessments & Predictions in terms of Standard Heritage

Field	Grade	Impact	Impact	Heritage	Certainty	Duration	Mitigation
Rating			Significance	Significance	of Impacts		
GP.C	-	Local	Negligible	Low	Improbable	Short term	А

Note! – There are no further actions recommended for this site because it is located some 15m away from the bulk pipeline servitude which is along the existing road.



Figure 13- House foundation/ruins

Site	MDD-3			
Туре	Reservoir			
Density	1 structure			
Location/Coordinates	S25 13 28.0 E28 30 23.8			
Approximate Age (More than 60 Or Less than	Less than 60 years old			
60 years old)				
Applicable Section of the NHRA, No 25 of	Section 34			
1999:				
Description:				
This is not a heritage or historic site, but a reservoir located not very far from the proposed bulk water				
supply rout (Figure 14).				

Nature of Impacts, Assessments & Predictions in terms of Standard Heritage

Field	Grade	Impact	Impact	Heritage	Certainty	Duration	Mitigation
Rating			Significance	Significance	of Impacts		
GP.C	-	Local	Negligible	Low	Improbable	Short term	А

Note! – There are no further actions recommended - not a heritage or historic site.



Figure 14- Reservoir

Site	MDD-4			
Туре	Historic settlement - Disturbed land with stone			
	walling			
Density	High density			
Location/Coordinates	S25 13 21.9 E28 30 15.2			
Approximate Age (More than 60 Or Less than	More than 60 years old			
60 years old)				
Applicable Section of the NHRA, No 25 of	Section 35			
1999:				
Description:				
The site is a historic settlement located approximately 50 or more meters from the bulk water pipeline				
supply servitude (Figure 15).				

Nature of Impacts, Assessments & Predictions in terms of Standard Heritage

Field	Grade	Impact	Impact	Heritage	Certainty	Duration	Mitigation
Rating			Significance	Significance	of Impacts		
GP.C	-	Local	Negligible	Low	Improbable	Short term	А

Note! – The site is located far from the main pipeline servitude and will not be impacted. It is located some 50 meters from the main pipeline servitude.



Figure 15- Historic settlement site.

Site	MDD-5			
Туре	Historic/recent settlement - stone walling			
Density	Low density			
Location/Coordinates	S25 13 14.4 E28 30 11.2			
Approximate Age (More than 60 Or Less than	Less than 60 years old			
60 years old)				
Applicable Section of the NHRA, No 25 of	Section 34			
1999:				
Description:				
The site is recent abandoned settlement site consisting of one stone wall. Like MDD-4 it is located				
approximately 50 or more meters from the bulk water pipeline supply servitude (Figure 16).				

## Nature of Impacts, Assessments & Predictions in terms of Standard Heritage

Field	Grade	Impact	Impact	Heritage	Certainty	Duration	Mitigation
Rating			Significance	Significance	of Impacts		
GP.C	-	Local	Negligible	Low	Improbable	Short term	А

Note! – The site is located far from the main pipeline servitude and will not be impacted. It is located some 50 meters from the main pipeline servitude. The site is also less than 60 years.



Figure 16- Historic settlement site

## 6. DISCUSSION AND CONCLUSIONS:

The desktop and cadastral search of the project area did not yield an information about Mathanjana Magisterial District. Information about archaeological and historical resources was yielded about the broader study regions - Mpumalanga and Limpopo Provinces. The physical survey of the project area yielded five sites: a burial ground and grave site in a form of a single grave (MMD-1) and four built environment and landscape features in form of house foundation ruins (MDD-2), two historic/recent settlement sites (MMD-4 & 5) and a recent reservoir (MMD-3) (Figure 14). All the 5 sites are located along the proposed bulk water supply pipeline route/servitude from Rust De Winter Dam to Masobe Village where the bulk water pipeline will end before the water is refined and distributed to various villages in MMD. Four of the five identified sites are located within close proximity to Rust De Winter Dam and the grave site towards Masobe Village (Figure 17). The grave site is located on the border of farms Tamboottenpan 75 JR and Kliprand 76 JR and close to Masobe Village (Figure 17). The potential impact to the grave site is highly probable even though it is visible enough to be

noticed because it falls exactly with the surveyed bulk water supply servitude of 30m (15 meters on either sides). The impact of the proposed development, especially the bulk water supply pipeline excluding distribution once it reaches Masobe Village is very low. Most of these site are located outside the pipeline servitude - for example, MDD-2 (Figure 13), MMD-4 (Figure 15) and MMD-5 (Figure 16).

Based on the findings of the study it is concluded the proposed development will have minimum impact on the cultural environment in MMD. The only impact to the cultural environment that will occur is the potential destruction of a single grave (MMD-1) (Figure 12 & 17). This grave will need to be mitigated and two mitigation measures on how this can be achieved include:

- Fencing off the graves and developing a grave management plan for construction and post construction phase of the project. The pipeline will also need to be divert approximately 15m or more from the grave position.
- To relocate the grave to a municipal formalised cemetery provided that the bulk water pipeline cannot be diverted.

Out of the two mitigation measures the first is the most preferred measure, because relocating the grave is an intense and costly exercise and the development of a pipeline will not have a server negative residual impact of the resource.

## 7. RECOMMENDATIONS

Based on the discussion and conclusions about the study area the following recommendations are made about the known heritage resources located within the study area, MMD:

- It is recommended that a Phase II plan of study should be developed for the single grave located in close proximity to Masobe Village (Figure 17).
- The most viable and suitable mitigation measure for this grave is to fence it off from the construction activities and develop a grave management plan to manage it during the construction and post construction phase of the project (during pipeline maintenance). there
- It is further recommended that SAHRA should grant a positive Review Comment for the project, provided that the client agrees to implement the recommendations of this HIA.

### **Disclaimer**

Because of the nature of some archaeological and heritage resources, such as unmarked graves, are subterranean in nature and might have been missed by the current study. The developer should take note of this. In cases such resources are unearthed during the excavation, subsoil and vegetation clearing processes for the placement of for the pipeline - the resources should be treated as chance finds. Refer to Appendix 2 "Heritage Management proposed provision of bulk water supply from Rust De Winter Dam to MMD, Limpopo/Mpumalanga Provinces, South Africa " for the management of chance finds.







Figure 17- Map showing the distribution of identified heritage resources along the servitude of the proposed bulk water supply pipeline



### 8. REFERENCES

Binneman, J.N.F; C. Booth & Higgitt, N. 2011. An Archaeological Desktop Study And Phase 1 rchaeological Impact Assessment (Aia) for the Proposed Clidet Data Cable Between Bloemfontein, Orange Free State And Graaff Reinet, Eastern Cape Province; Colesberg, Orange Free State And Port Elizabeth, Eastern Cape Province; George, Western Cape Province And Port Elizabeth, Eastern Cape Province And; Aliwal North And East London, Eastern Cape Province.

Binneman, J.N.F; Booth, C & Higgitt, N. 2010c. A Phase 1 Archaeological Impact Assessment (AIA) for the proposed Dorper Wind Energy Facility on a site near Molteno, Chris Hani District Municipality, Eastern Cape Province.

Binneman, J., Webley, L. & Biggs, V. 1992. Preliminary notes on an Early Iron Age site in the Great Kei River Valley, Eastern Cape. Southern African Field Archaeology 1: 108-109.

Deacon, H.J. & Deacon, J. 1999. Human beginnings in South Africa. Cape Town: David Phillips Publishers.

Goodwin, A. J. H. 1926. The Victoria West Industry. In: Goodwin, A.J.H. & van Riet Lowe, C. (eds). The South African Cultures of South Africa. Annals of the South African Museum.

Goodwin, A.J.H. 1946. Earlier, Middle and Later. South African Archaeological Bulletin, 3 (1):74-76.

Goodwin, A.J.H. & Lowe, C. van Riet. 1929. The Stone Age cultures of South Africa. Annals of the South African Museum.

Hall, S & B.W. Smith, 2000. Empowering Places: Rock Shelters and Ritual control in the Farmer- Forager Interactions in the Limpopo Province [A Case of Saltpan Rock Shelter]

Huffman, T.N. 2007. Handbook for the Iron Age. Pietermaritzburg: UKZN Press.

Huffman, T. N. 1982. Archaeology and Ethnohistory of the African Iron Age. Annual review of Anthropology, 11:133-150.

Humphreys, A.J.B. 1991. On the distribution and dating of bifacial and tanged arrowheads in the interior of South Africa. The South African Archaeological Bulletin, 46(153):41-43.

Klatzow, S. 1994. Roosfontein, a contact site in the eastern Orange Free State. The South Africa Archaeological Bulletin, 49(159):9-15.

Klein, R. G. 1983. The Stone Age Prehistory of Southern Africa. Annual Review of Anthropology 12: 25-48.

Loubser, J; Brink, J & Laurens, G. 1990. Paintings of the extinct Blue Antelope, Hippotragus leucophaeus, in the Eastern Orange Free State. The South African archaeological Bulletin, 45(152):106-111.

Lycett, S.J. 2009. Are Victoria West cores "proto-Levallois"? A phylogenetic assessment. Journal of Human Evolution, Vol. 56:175-199.

Malan, B.D. 1949. Mangosian and Howieson's Poort. The South African Archaeological Bulletin, 4(13):34-36.

Manhire, A. H; Parkington, J.E; Mazel, A.D & Maggs, T. M. 1986. Cattle, sheep and horses: A review of domestic animals in the rock art of southern Africa. South Africa Archaeological Society Goodwin Series, 5: 22-30.

Milton, J. 1983. The Edges of War. Cape Town: Juta & Co.

Morris, D. 1988. Engraved in place and time: a review of variability in the rock art of the Northern Cape and Karoo. South African Archaeological Bulletin, Vol. 43:109-121.

Neville, D; Sampson, B.E & Sampson, C.G. 1994. The Frontier Wagon Track System in the Seacow River Valley, North-Eastern Cape. The South African Archaeological Bulletin, 49(160):65-72.

Ouzman, S. 2005. The magical arts of a raider nation: Central South Africa's Korana rock Art. South Africa Archaeological Society Goodwin Series 9:101-113.

Pickles, J & Woods, J. 1992. South Africa's Homelands in the Age of Reform: The Case of QwaQwa. Annals of the Association of American Geographers, Vol. 82, No. 4: 629-652

Sadr, K & Sampson, G. 1999. Khoekhoe ceramics of the upper Seacow Valley. South Africa Archaeological Bulletin, 54:3-15.

Sampson, C. G. 1984. Site clusters in the Smithfield settlement pattern. The South African Archaeological Bulletin, 39(139):5-23.

Sampson, C. G. 1985. Atlas of Stone Age Settlement in the Central and Upper Seacow Valley. Memoirs van die Nasionale Museum Bloemfontein, Vol. 20:1-116.

Sampson, C.G. 1988. Stylistic boundaries among mobile hunter-foragers. Washington: Smithsonian Institution Press.

Smith, R.A. 1919. Recent finds of the Stone Age in Africa. Man, 19:100-106.

Smith, A; Malherbe, C; Guenther, M and Berens, P. 2004. The Bushman of southern Africa: a foraging society in transition. Cape Town: David Philip Publishers:

SOUTH AFRICA, 1983. Human Tissue Act. Government Gazette.

SOUTH AFRICA 1999. NATIONAL HERITAGE RESOURCES ACT (No 25 of 1999), Government Gazette. Cape Town..

SAHRA APMHOB. 2004. Policy for the management of Archaeology, Palaeontology, Meteorites and Heritage Object. . SAHRA: Cape Town.

SAHRA APM. 2006. Guidelines: Minimum standards for the archaeological and palaeontological Component of Impact Assessment Reports. . SAHRA: Cape Town.

SAHRA APMHOB 2002. General Introduction to surveys, impact assessments and management plans. . SAHRA: CT.

SAHRA. 2002. General guidelines to Archaeological Permitting Policy. SAHRA: Cape Town.

SAHRA. 2002. General Introduction to surveys, impact assessments and management plans.

SAHRA. What to do when Graves are uncovered accidentally.

Thackeray, A.I. 1983. Dating the Rock Art of Southern Africa. South Africa Archaeological Society Goodwin Series, 4:21-26.

Thompson, E. & Marean, C.W. 2008. The Mossel Bay lithic variant: 120 years of Middle Stone Age Research from Cape St. Blaize Cave to Pinnacle Point. South Africa Archaeological Society Goodwin Series, 10: 90-104.

Thorp, C.R. 1996. A preliminary report on evidence of interaction between hunter-gatherers and farmers along a hypothesised frontier in the eastern Free State. The South African Archaeological Bulletin, 51: 57-63.

Tomose, N.G & M. Murimbika. 2012. Heritage Scoping Report for Lephalale Local Municipality, Waterberg District Municipality, Limpopo Province, South Africa. Unpublished HIA Report

Walton, J. 1953. An Early Fokeng-Hlakoana Settlement at Metlaeeng, Basutoland. The South African Archaeological Bulletin, 8 (29): 3-11.

Woodhouse, H.C. 1984. [Correction:] Lion kills: A previously unidentified theme in the

Bushman Art of Southern Africa. The South Africa Archaeological Bulletin, 39(139):4.

WILSON, M. 1969. Changes in social structure in southern Africa: the relevance of kinship studies to the historian. In: L. Thompson, ed., African societies in southern Africa. London: Heinemann, pp. 71–85.


10.2. APPENDIX 2: HERITAGE MANAGEMENT PLAN INPUT INTO THE PROPOSED PROVISION OF BULK WATER SUPPLY FROM RUST DE WINTER DAM TO MMD, LIMPOPO/MPUMALANGA PROVINCES, SOUTH AFRICA

Chart Title:	Heritage Manage	ment Inputs for	the proposed	provision of bu	ılk water sup	ply from R	ust De Winte	er Dam to MMD,	©
	Limpopo/Mpumala	anga Provinces, Sc	outh Africa						NGT
Project Title:									
Objectives of	To avoided	disturbance/destruc	tion/damage to the ide	entified and unident	ified heritage res	sources with ar	nd immediately ar	ound the project area	
the inputs	To actively	and properly manag	e all the identified reso	ources with the proj	ect area				
	<ul> <li>To mitigate</li> </ul>	any impact or pote	ential impacts to the	identified and unide	entified heritage	resources dur	ing the project	olanning, construction	and operational
	phases								
Type of	Mitigation of Herita	age Resources Du	ring Different Projec	t Phases		Responsib	Duration	Contact	EMP
Resources						ility/Impl			
						ementer/			
					·	Monitor			
	Planning	Construction	Chance	Rehabilitation	Operational			Client/EM to	
			Finds/Disturbanc						
			es During						
			Construction					-	
Archaeological	Ensure that all the	Ensure that the	Construction needs	The identified	During this	Environme	Ihroughout	Contact a	Include all
[Stone Age	identified and	demarcated	to stop	mapped and	phase all the	ntal Control	the project -	professional and	significant
(ESA,	mapped	archaeological	immediately and a	demarcated	resources	Officer	reporting to	accredited	archaeological/
MSA&LSA);	archaeological	resources, both	professional and	archaeological	that were	(ECO)	environmenta	archaeologist in	palaeontologic
Iron Age (EIA,	resources, both	with and	accredited	resources need	identified and		I manager on	terms of Section	al/meteorite
MIA? LIA);	immediately	immediately	archaeologist or	to be included	for		weekiy basis	35 OI LINE INHRA,	the Integrated
Historic	around the project	around the	paraeonitologist	robabilitation	conservation		in cases of	"Proforable the ope	Environmontal
	footprint are	are pot	on sites to				chance finds	involved in the	Management
Palaeontologic	demarcated in	disturbed at all	investigate and	project	pulposes		chance milds.	project scoping	Plan as part of
	preparation for	times Ensure	evaluate the finds	project	monitored on			and/or FLA phases"	Section 35 of
Meteorite	construction	that no	and make		6 months to				the NHRA
Meteorite.	activities and	machinery or	necessary		annual basis				No 25 of 1999
	associated	other	recommendations						or include
	infrastructure.	construction	(e.g. objects in						them in terms
	(These Sections	related	terms of Section						of Section 38
	are also worthy to	infrastructure	32 of the NHRA,						of the NHRA
	note 7, 27, 31 of	compromises the	No. 25 of 1999)						depending on
	the NHRA, NO.25 of	nature of any of							the nature and
	1999). A 5m buffer	these resources							size of

	is recommended					© NGT			development
Historical, Built	Ensure that all	Ensure that all	Should any	The identified	During this	ECO	Throughout	Contact a	Include all
Environment &	historical, built	the demarcated	unplanned	mapped and	phase all the		the project -	professional and	significant
Landscape	environment &	historical & built	disturbance to such	demarcated	resources		reporting to	accredited heritage	heritage
(incl.	landscape features	environment and	resources occur as	resources or	that were		environmenta	consultant in terms	resources in
Industrial)	including industrial	landscape	a result of	resources	identified and		1	of Section 34 of	the Integrated
	structures/features	feature including	unforeseen events	included in the	demarcated		manager/proj	the NHRA, No.25 of	Environmental
	are documented,	industrial	such as accident	current project	for		ect manager	1999. "Preferable	Management
	mapped,	structures/featur	the work needs to	construction	conservation		on weekly	the one involved in	Plan as part of
	demarcated in	es are not in any	stop immediately	activities either	purposes		basis and	the project scoping	Section 34 of
	preparation for	way	and a qualified	through	need to be		urgently in	and/or EIA	the NHRA,
	construction	compromised by	heritage consultant	additions and/or	monitored on		cases of	phases".	No.25 of 1999
	activities and	the construction	needs to be called	alterations need	6 months to		unforeseen		or include
	related	unless they form	on site to	to be included	annual basis		disturbances	In case of	them in terms
	infrastructure	an integral part	investigate and	in the overall	– this		as a result of	discovery of	of Section 38
	unless they will	of the	evaluate the nature	project area	includes		accidents.	heritage objects (in	of the NHRA
	form part of the	construction	of disturbance and	rehabilitation	structures/fea			terms of Section	depending on
	project	such as	make necessary		tures added			32 of the NHRA, No	the nature and
	construction such	additions and/or	recommendations.		on/altered			25 of 1999)	size of
	addition and/or	alterations.	In case of					through	development
	alteration in which		discovery of					construction/diggin	
	case a permit		heritage objects (in					g, an archaeologist	
	needs to be applied		terms of Section					will be called on	
	for from relevant		32 of the NHRA, No					site.	
	responsible		25 of 1999)						
	authority e.g.		through						
	SAHRA or PHRA		construction/diggin						
	(refer to Section 7		g an archaeologist						

	& 27 of the NHRA,		will be called on						
	N0.25 of 1999). A		site.						
	5 to 2m buffer is								
	recommended for								
	structures/features								
	not forming part of								
	the current								
	construction.								
Burial Grounds	Ensure that all the	Ensure that the	Should any an	The identified,	During this	Environme	Throughout	Contact a	Include all
& Grave	identified and	demarcated	previously un	mapped and	phase all the	ntal Control	the project -	professional and	burials and
	mapped burial	burial grounds	identified burials	demarcated	resources	Officer	reporting to	accredited	graves
	grounds and	and grave sites,	and graves, as a	burial grounds	that were	(ECO)	environmenta	archaeologist in	Integrated
	graves sites (e.g.	both with and	result of them	and graves sites	identified and		I manager on	terms of Section	Environmental
	isolate graves or	immediately	being unmarked to	need to be	demarcated		weekly basis	35 of the NHRA,	Management
	cemeteries – both	around the	make them visible,	included in the	for		and urgently	No.25 of 1999.	Plan as part of
	municipal	project footprint,	be accidentally	rehabilitation	conservation		in cases of	"Preferable the one	Section 36 of
	formalised and	are not	discovered/uncover	plan of the	purposes		accidentally	involved in the	the NHRA,
	those not	disturbed at all	-construction	project	need to be		discovered/u	project scoping	No.25 of 1999
	formalised as	times. Ensure	needs to stop		monitored on		ncovered	and/or EIA phases"	or include
	such), both within	that no	immediately and a		monthly, 6		burials and		them in terms
	and immediately	machinery or	professional and		months to		graves.		of Section 38
	around the project	other	accredited		annual basis				of the NHRA
	footprint, are	construction	archaeologist		as deemed				depending on
	demarcated in	related	dealings with		necessary by				the nature and
	preparation for	infrastructure	burials and graves		the				size of
	construction	compromises the	need to be called		responsible				development.
	activities and	nature of any of	on sites to		archaeologist				
	associated	these resources	investigate and		in				
	infrastructure.		evaluate the finds		consultation				
	Should it be		and make		with the EM				
	deemed that they		necessary		or client &				
	will inevitably be		recommendations		ECO				
	disturbed a permit		(e.g. in terms of						
	needs to be applied		Section 36 of the						
	for with SAHRA		NHRA, No. 25 of						
	BGG Unit in terms		1999)						

	of Section 36 of				
	the NHRA, N0.25 of				
© NGT	1999). In a case				
	where they will not				
	be direct impacted				
	it is recommended				
	that a 5m buffer				
	need to be made				
	available				