



HLONGOANE SHOPPING CENTRE

**Proposed Development of a Shopping Centre on Portion 1 of the Farm
Kroonstad 468 LR, west of Marken in the Mogalakwena Local
Municipality, Waterberg District, Limpopo Province.**

Heritage Impact Assessment

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Client: Tekplan Environmental

DECLARATION OF INDEPENDENCE

The report has been compiled by PGS Heritage, an appointed Heritage Specialist for Tekplan Environmental. The views stipulated in this report are purely objective and no other interests are displayed in the findings and recommendations of this Heritage Impact Assessment.

HERITAGE CONSULTANT: PGS Heritage

CONTACT PERSON: Marko Hutten
Tel: +27 (012) 332 5305
Fax: +27 (012) 332 2625
Email: marko@gravesolutions.co.za


SIGNATURE: _____

ACKNOWLEDGEMENT OF RECEIPT

CLIENT: Tekplan Environmental

CONTACT PERSON: Anton von Well
PO Box 55714
Polokwane
0700
Tel: +27 (015) 291 4176
Fax: +27 (086) 218 3267
Email: tecoplan@mweb.co.za

SIGNATURE: _____

Report Title	Heritage Impact Assessment for the proposed development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.		
Control	Name	Signature	Designation
Authors	Marko Hutten		Heritage Specialist / PGS Heritage
Reviewed	Anton von Well		Client / Tekplan Environmental

EXPLANATION OF ABBREVIATIONS USED IN THIS DOCUMENT

<i>Abbreviations</i>	<i>Description</i>
AIA	Archaeological Impact Assessment
ASAPA	Association of Southern African Professional Archaeologists
CMP	Conservation Management Plan
CRM	Cultural Resource Management
EIA	Environmental Impact Assessment
EMPR	Environmental Management Programme Report
ESA	Early Stone Age
GPS	Global Positioning System
HIA	Heritage Impact Assessment
LIA	Late Iron Age
LSA	Later Stone Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
PGS	PGS Heritage
PHRA	Provincial Heritage Resources Authority
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System

EXECUTIVE SUMMARY

PGS Heritage was appointed by Tekplan Environmental to undertake a Heritage Impact Assessment (HIA) which forms part of the Environmental Impact Assessment (EIA) for the proposed development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.

An archival and historical desktop study was undertaken which was used to compile a historical layering of the study area within its regional context. This component indicated that the landscape within which the project area is located has a rich and diverse history. However, the desktop study did not reveal any historic or heritage sites from within the specific locations of the study area.

The desktop study work was followed by a fieldwork component which comprised a walkthrough of the study area. The proposed site was flat and was largely overgrown with pioneer vegetation as the site was previously used for agricultural purposes. The area was previously de-bushed and disturbed to be used as agricultural fields. The site is not currently used for agricultural purposes and some pioneer plant growth has returned. **No heritage sites were identified within the study area.**

The development is not expected to have any impact on heritage sites. As such, no heritage reasons can be given for the development not to continue.

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1 INTRODUCTION

PGS Heritage was appointed by Tekplan Environmental to undertake a Heritage Impact Assessment (HIA) which forms part of the Environmental Impact Assessment (EIA) for the proposed development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.

1.1 Scope of the Study

The aim of the study is to identify possible heritage sites and finds that may occur in the proposed development area. The Heritage Impact Assessment (HIA) aims to inform the Environmental Impact Assessment (EIA) in the development of a comprehensive Environmental Management Plan (EMP) to assist the developer in managing the identified heritage resources in a responsible manner in order to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999) (NHRA).

1.2 Specialist Qualifications

This Heritage Impact Assessment was compiled by PGS Heritage, the staff of which has a combined experience of nearly 40 years in the heritage consulting industry and have extensive experience in managing Heritage Impact Assessment (HIA) processes. Mr Marko Hutten, heritage specialist and project archaeologist, has 15 years of experience in the industry and is registered with the Association of Southern African Professional Archaeologists (ASAPA) as a Professional Archaeologist and is accredited as a Field Director.

1.3 Assumptions and Limitations

Not detracting in any way from the comprehensiveness of the fieldwork undertaken, it is necessary to realise that the heritage sites located during the fieldwork do not necessarily represent all the heritage sites present within the area. Should any heritage features or objects not included in the inventory be located or observed, a heritage specialist must immediately be contacted. Such observed or located heritage features and/or objects may not be disturbed or removed in any way, until such time that the heritage specialist has been able to make an assessment as to the significance of the site (or material) in question. This applies to graves and cemeteries as well.

1.4 Legislative Context

The identification, evaluation and assessment of any cultural heritage site, artefact or find in the South African context is required and governed by the following legislation:

- i. National Environmental Management Act (NEMA) Act 107 of 1998
- ii. National Heritage Resources Act (NHRA) Act 25 of 1999
- iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- iv. Development Facilitation Act (DFA) Act 67 of 1995

The following sections in each Act refer directly to the identification, evaluation and assessment of cultural heritage resources.

- i. National Environmental Management Act (NEMA) Act 107 of 1998
 - a. Basic Environmental Assessment (BEA) – Section (23)(2)(d)
 - b. Environmental Scoping Report (ESR) – Section (29)(1)(d)
 - c. Environmental Impacts Assessment (EIA) – Section (32)(2)(d)
 - d. EMP (EMP) – Section (34)(b)
- ii. National Heritage Resources Act (NHRA) Act 25 of 1999
 - a. Protection of Heritage Resources – Sections 34 to 36; and
 - b. Heritage Resources Management – Section 38
- iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
 - a. Section 39(3)

The NHRA stipulates that cultural heritage resources may not be disturbed without authorization from the relevant heritage authority. Section 34(1) of the NHRA states that “no person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority...”. The NEMA (No 107 of 1998) states that an integrated EMP should (23:2 (b)) “...identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage”. In accordance with legislative requirements and EIA rating criteria, the regulations of SAHRA and ASAPA have also been incorporated to ensure that a comprehensive and legally compatible HIA report is compiled.

1.5 Terminology and Abbreviations

Archaeological resources

- i. 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;
- ii. 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 a 10m buffer area;
- iii. 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;
- iv. 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 according to the heritage agency result in a change to the nature, appearance or physical nature of a place or influence its stability & future well-being, including:

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

Fossil

Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

Heritage resources

This means any place or object of cultural significance

Later Stone Age

The archaeology of the last 20 000 years, associated with fully modern people.

Late Iron Age (Early Farming Communities)

The archaeology of the last 1000 years up to the 1800's associated with ironworking and farming activities such as herding and agriculture.

Middle Stone Age

The archaeology of the Stone Age, dating to between 20 000-300 000 years ago, associated with early modern humans.

Palaeontology

Any fossilised remains or fossil trace of animals or plants which lived in the geological past and any site which contains such fossilised remains or trace.

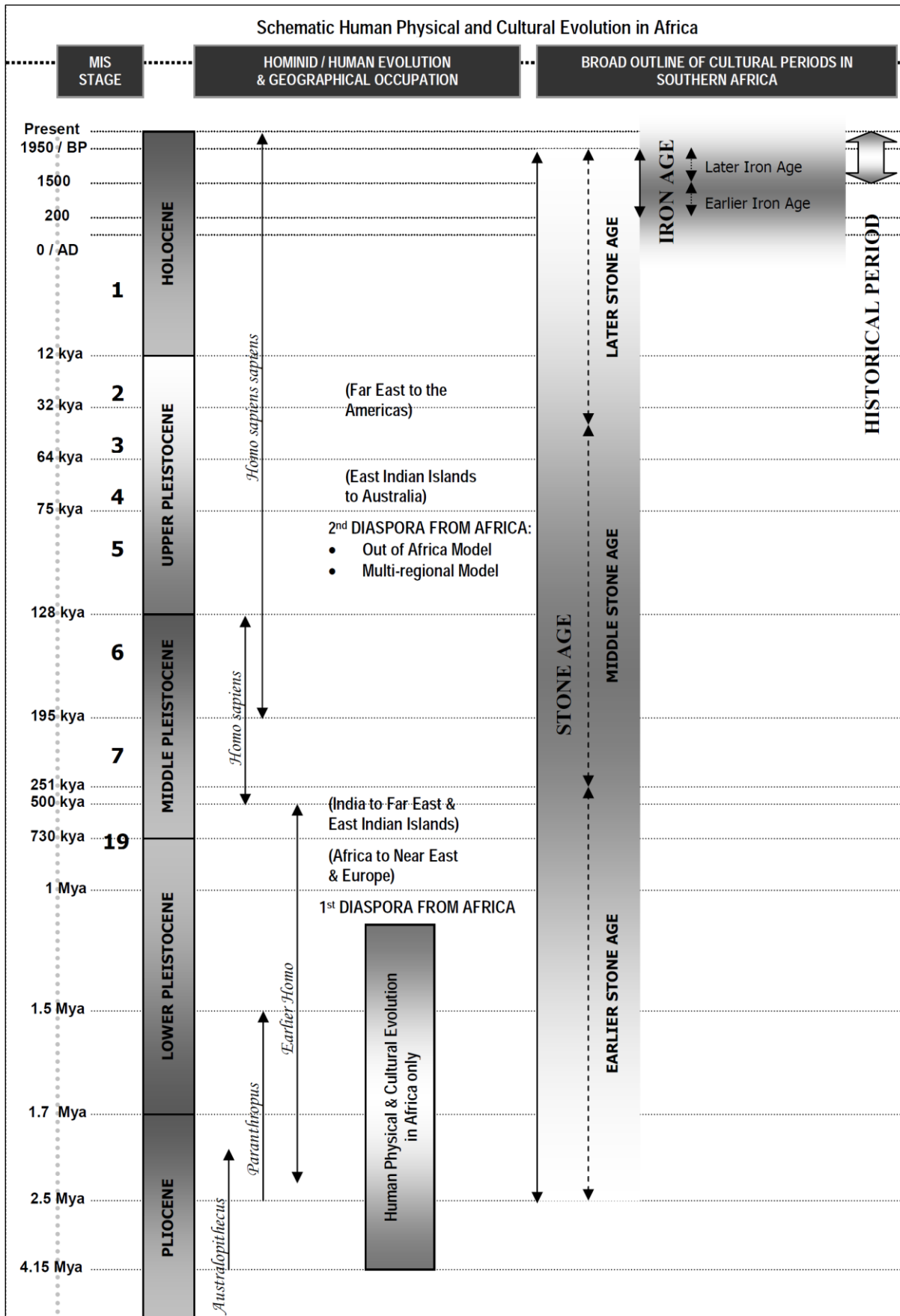


Figure 1 – Human and Cultural Time line in Africa (Morris, 2008)

2 TECHNICAL DETAILS OF THE PROJECT

2.1 Site Location and Description

The developer, Doornhoek Developments CC, proposed the development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, approximately 30km west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.

The proposed shopping centre will occupy an area of approximately 5 hectares. The site was situated on the north-eastern corner of the T-junction between the R518 tar road (Marken / Lephalale) and the D3110 road. It was situated adjacent and on the eastern side of Ga-Phaladira village. The proposed site was relatively flat and sloped gently down to the south-west. The proposed property is currently used as a grazing facility for the livestock of local residents as well as an area for the collection of fire wood. A small non-perennial stream crossed the south western corner of the property. This area was also disturbed during the construction of the roads. Large boulders were also dumped into this small stream. The rest of the property was previously used as agricultural fields and it was covered with pioneer plant growth such as *Sweet thorn* and *Sickle Bush*. The property was not fenced. Tracks criss-crossed the property and an old gravel road and a power line crossed the property from the south to the north.

Coordinates	Shongoane Shopping Centre: S23° 34' 42.8" E28° 07' 53.8"
Property	Farm: Portion 1 of the Farm Kroonstad 468 LR.
Location	The proposed shopping centre will be situated on Portion 1 of the Farm Kroonstad 468 LR, approximately 30km west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.
Extent	The proposed shopping centre will occupy an area of approximately 5 hectares.
Land Description	The proposed site was relatively flat and sloped gently down to the south-west. The proposed property was used as a grazing facility for local residents as well as an area for the collection of fire wood. A small non-perennial stream crossed the south western corner of the property. This area was also disturbed during the construction of the roads. The rest of the property was previously used as agricultural fields and it was covered with pioneer plant growth such as <i>Sweet thorn</i> and <i>Sickle Bush</i> . Tracks criss-crossed the property and an old gravel road and a power line crossed the property from the south to the north.

Ga Phaladira Shopping Centre Development



0 0.25 0.5 Kilometres

1:7,500



-  Study area
-  Track log

Image: 2328C.jp2
Source: Spot Image / CSIR
Datum: WGS84
Study Area: Part of the farm Kroonstad 468 LR

Figure 2 – The proposed study area.

2.2 Technical Project Description

The proposed development will occupy an area of approximately 5 hectares and will be situated on Portion 1 of the Farm Kroonstad 468 LR. The development will comprise several retail shops, a hardware shop, a filling station and fast food outlets. Fifteen flats (accommodation units) will be constructed on top of the shopping centre. Engineering services such as access roads, sewage, water supply and electricity will also be installed. Adequate parking facilities for vehicles will also be provided. The development will exclude the area where the small non-perennial stream is located.

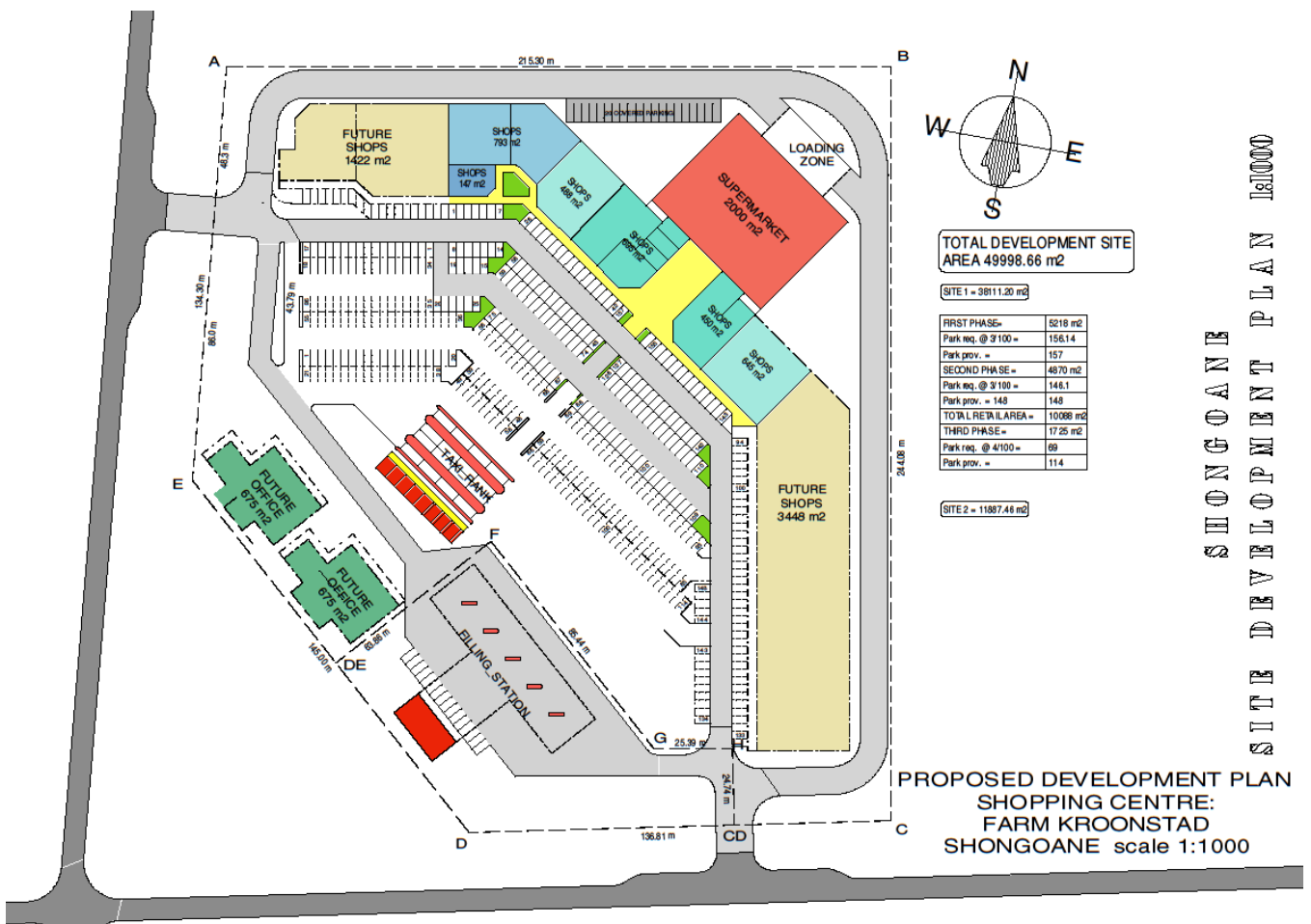


Figure 3– The proposed development layout plan (as supplied by the client).

3 ASSESSMENT METHODOLOGY

3.1 Methodology for Assessing Heritage Site Significance

This report was compiled by PGS Heritage for the proposed development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province. The applicable maps, tables and figures are included as stipulated in the NHRA (no 25 of 1999) and the National Environmental Management Act (NEMA) (no 107 of 1998). The HIA process consisted of three steps:

Step I – Literature Review: The background information to the field survey leans greatly on the archival and historical cartographic material assessed as part of the study as well as a study of the available literature.

Step II – Physical Survey: The physical survey was conducted on foot over the entire area proposed for development. Priority was placed on the undisturbed areas. A systematic inspection of the area on foot along linear transects resulted in the maximum coverage of the proposed area. The author and an experienced field worker surveyed the study area in parallel transects of approximately 25m between them. The field work was conducted on July 7, 2013 and a part of the morning was spent on the survey, which was performed by an archaeologist, M. Hutten and an experienced field worker T. Mulaudzi, who flanked the archaeologist during the survey. The survey focused on the indicated study area as provided by the developer where the proposed development will be situated. Areas outside of the indicated study area were not surveyed. No sampling was done as no sites or finds of heritage significance were found.

Step III – Report: The final step involved the recording and documentation of relevant heritage resources, as well as the assessment of resources regarding the heritage impact assessment criteria and report writing, as well as mapping and recommendations.

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

- Site integrity (i.e. primary vs. secondary context),
- Amount of deposit, range of features (e.g., stonewalling, stone tools and enclosures),
- Density of scatter (dispersed scatter)
 - Low - <10/50m²
 - Medium - 10-50/50m²

- High - >50/50m2
- 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 development position

D - Preserve site, or extensive data collection and mapping of the site; and

E - Preserve site

Site Significance

Site significance classification standards prescribed by the South African Heritage Resources Agency (2006) and approved by the Association for Southern African Professional Archaeologists (ASAPA) for the Southern African Development Community (SADC) region, were used for the purpose of this report (see Table 1).

Table 1: Site significance classification standards as prescribed by SAHRA

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; National Site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; Provincial Site nomination
Local Significance (LS)	Grade 3A	High	Conservation; Mitigation not advised
Local Significance (LS)	Grade 3B	High	Mitigation (Part of site should be retained)
Generally Protected A (GP.A)	Grade 4A	High/Medium	Mitigation before destruction
Generally Protected B (GP.B)	Grade 4B	Medium	Recording before destruction
Generally Protected C (GP.C)	Grade 4C	Low	Destruction

3.2 Methodology for Impact Assessment

In order to ensure uniformity, a standard impact assessment methodology has been utilised so that a wide range of impacts can be compared. The impact assessment methodology makes provision for the assessment of impacts against the following criteria:

- Significance;
- Spatial scale;
- Temporal scale;
- Probability; and
- Degree of certainty.

A combined quantitative and qualitative methodology was used to describe impacts for each of the aforementioned assessment criteria. A summary of each of the qualitative descriptors, along with the equivalent quantitative rating scale for each of the aforementioned criteria, is given in Table 2.

Table 2: Quantitative rating and equivalent descriptors for the impact assessment criteria

RATING	SIGNIFICANCE	EXTENT SCALE	TEMPORAL SCALE
1	VERY LOW	<i>Isolated corridor / proposed corridor</i>	<u>Incidental</u>
2	LOW	<i>Study area</i>	<u>Short-term</u>
3	MODERATE	<i>Local</i>	<u>Medium-term</u>
4	HIGH	<i>Regional / Provincial</i>	<u>Long-term</u>
5	VERY HIGH	<i>Global / National</i>	<u>Permanent</u>

A more detailed description of each of the assessment criteria is given in the following sections.

Significance Assessment

The significance rating (importance) of the associated impacts embraces the notion of extent and magnitude, but does not always clearly define these, since their importance in the rating scale is very relative. For example, 10 structures younger than 60 years might be affected by a proposed development, and if destroyed the impact can be considered as VERY LOW in that the structures are all of Low Heritage Significance. If two of the structures are older than 60 years

and of historic significance, and as a result of High Heritage Significance, the impact will be considered to be HIGH to VERY HIGH.

A more detailed description of the impact significance rating scale is given in Table 3 below.

Table 3: Description of the significance rating scale

RATING		DESCRIPTION
5	VERY HIGH	Of the highest order possible within the bounds of impacts which could occur. In the case of adverse impacts: there is no possible mitigation and/or remedial activity which could offset the impact. In the case of beneficial impacts, there is no real alternative to achieving this benefit.
4	HIGH	Impact is of substantial order within the bounds of impacts which could occur. In the case of adverse impacts: mitigation and/or remedial activity is feasible but difficult, expensive, time-consuming or some combination of these. In the case of beneficial impacts, other means of achieving this benefit are feasible but they are more difficult, expensive, time-consuming or some combination of these.
3	MODERATE	Impact is real but not substantial in relation to other impacts, which might take effect within the bounds of those which could occur. In the case of adverse impacts: mitigation and/or remedial activity are both feasible and fairly easily possible. In the case of beneficial impacts: other means of achieving this benefit are about equal in time, cost, effort, etc.
2	LOW	Impact is of a low order and therefore likely to have little real effect. In the case of adverse impacts: mitigation and/or remedial activity is either easily achieved or little will be required, or both. In the case of beneficial impacts, alternative means for achieving this benefit are likely to be easier, cheaper, more effective, less time consuming, or some combination of these.
1	VERY LOW	Impact is negligible within the bounds of impacts which could occur. In the case of adverse impacts, almost no mitigation and/or remedial activity is needed, and any minor steps which might be needed are easy, cheap, and simple. In the case of beneficial impacts, alternative means are almost all likely to be better, in one or a number of ways, than this means of achieving the benefit. Three additional categories must also be used where relevant. They are in addition to the category represented on the scale, and if used, will replace the scale.
	0	There is no impact at all - not even a very low impact on a party or system.

Spatial Scale

The spatial scale refers to the extent of the impact i.e. will the impact be felt at the local, regional, or global scale. The spatial assessment scale is described in more detail in Table 4.

Table 4: Description of the spatial significance rating scale

RATING		DESCRIPTION
5	Global/National	The maximum extent of any impact.
4	Regional/Provincial	The spatial scale is moderate within the bounds of possible impacts, and will be felt at a regional scale (District Municipality to Provincial Level). The impact will affect an area up to 50 km from the proposed site / corridor.
3	Local	The impact will affect an area up to 5 km from the proposed site.
2	Study Area	The impact will affect an area not exceeding the boundary of the study area.
1	Isolated Sites / proposed site	The impact will affect an area no bigger than the site.

Temporal/Duration Scale

In order to accurately describe the impact, it is necessary to understand the duration and persistence of an impact in the environment.

The temporal or duration scale is rated according to criteria set out in Table 5.

Table 5: Description of the temporal rating scale

RATING		DESCRIPTION
1	Incidental	The impact will be limited to isolated incidences that are expected to occur very sporadically.
2	Short-term	The environmental impact identified will operate for the duration of the construction phase or a period of less than 5 years, whichever is the greater.
3	Medium-term	The environmental impact identified will operate for the duration of life of the project.
4	Long-term	The environmental impact identified will operate beyond the life of operation of the project.
5	Permanent	The environmental impact will be permanent.

Degree of Probability

The probability or likelihood of an impact occurring, will be outlined in table 6 below.

Table 6: Description of the degree of probability of an impact occurring

RATING	DESCRIPTION
1	Practically impossible
2	Unlikely
3	Could happen
4	Very likely
5	It's going to happen / has occurred

Degree of Certainty

As with all studies, it is not possible to be 100% certain of all facts, and for this reason a standard “degree of certainty” scale is used, as discussed in Table 7. The level of detail for specialist studies is determined according to the degree of certainty required for decision-making.

Table 7: Description of the degree of certainty rating scale

RATING	DESCRIPTION
Definite	More than 90% sure of a particular fact.
Probable	Between 70 and 90% sure of a particular fact, or of the likelihood of that impact occurring.
Possible	Between 40 and 70% sure of a particular fact, or of the likelihood of an impact occurring.
Unsure	Less than 40% sure of a particular fact or the likelihood of an impact occurring.
Can't know	The consultant believes an assessment is not possible even with additional research.

Quantitative Description of Impacts

To allow for impacts to be described in a quantitative manner, in addition to the qualitative description given above, a rating scale of between 1 and 5 was used for each of the assessment criteria. Thus the total value of the impact is described as the function of significance, spatial and temporal scale, as described below:

$$\text{Impact Risk} = (\text{SIGNIFICANCE} + \text{Spatial} + \text{Temporal}) \times \text{Probability}$$

3

5

An example of how this rating scale is applied is shown below:

Table 8: Example of Rating Scale

IMPACT	SIGNIFICANCE	SPATIAL SCALE	TEMPORAL SCALE	PROBABILITY	RATING
	Low	Local	Medium Term	Could Happen	Low
Impact on heritage structures	2	3	3	3	1.6

Note: The significance, spatial and temporal scales are added to give a total of 8, which is divided by 3 to give a criterion rating of 2.67. The probability (3) is divided by 5 to give a probability rating of 0.6. The criteria rating of 2.67 is then multiplied by the probability rating (0,6) to give the final rating of 1,6.

The impact risk is classified according to five classes as described in the table below.

Table 9: Impact Risk Classes

RATING	IMPACT CLASS	DESCRIPTION
0.1 – 1.0	1	Very Low
1.1 – 2.0	2	Low
2.1 – 3.0	3	Moderate
3.1 – 4.0	4	High
4.1 – 5.0	5	Very High

Therefore, with reference to the example used for heritage structures above, an impact rating of 1.6 will fall in the Impact Class 2, which will be considered to be a low impact.

4 CURRENT STATUS QUO

4.1 DESCRIPTION OF STUDY AREA

The developer, Doornhoek Developments CC, proposed the development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, approximately 30km west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.

The proposed shopping centre will occupy an area of approximately 5 hectares. The site was situated on the north-eastern corner of the T-junction between the R518 tar road (Marken / Lephalale) and the D3110 road (figure 4). It was situated adjacent and on the eastern side of Ga-Phaladira village. The proposed site was relatively flat (figure 5) and sloped gently down to the

south-west. The proposed property was used as a grazing facility for the livestock of local residents as well as an area for the collection of fire wood. A small non-perennial stream crossed the south western corner of the property. This area was also disturbed during the construction of the roads. Large boulders were also dumped into this small stream (figure 6). The rest of the property was previously used as agricultural fields and it was covered with pioneer plant growth such as *Sweet thorn* and *Sickle Bush* (figure 7). The property was not fenced. Tracks criss-crossed the property and an old gravel road (figure 8) and a power line (figure 9) crossed the property from the south to the north.



Figure 4 – View of the R518 tar road to the south of the proposed site.



Figure 5 – General view of the proposed site from the south-west.



Figure 6 – View of the dumped rocks in the small stream.



Figure 7 – General view of the pioneer vegetation on the site.



Figure 8 – View of the old gravel road across the site.



Figure 9 – View of the power line across the site.

5 DESKTOP STUDY FINDINGS

The examination of heritage databases, historical data and cartographic resources represents a critical additional tool for locating and identifying heritage resources and in determining the historical and cultural context of the study area. Therefore an internet literature search was conducted and relevant archaeological and historical texts were also consulted. Relevant topographic maps and satellite imagery were studied.

Previous Studies

Researching the SAHRA APM Report Mapping Project records and the SAHRIS online database (<http://www.sahra.org.za/sahris>), it was determined that one previous but very extensive study was mapped as overlapping the current study area:

Gaigher, S. 2002. **Heritage Impact Assessment Scoping for the Proposed Matimba- Witkop Power Line.** An unpublished report by Archaeo-Info on file at SAHRA as 2002-SAHRA-0074.

This study, Map ID Number 00302, was not found on the SAHRIS database (accessed 8th October 2013). A number of other archaeological or historical studies have been performed within the wider vicinity of the study area, especially in the Lephalale area some 60 km to the west. Previous studies listed for the area in the APM Report Mapping Project included a number of surveys within the area listed in chronological order below:

Pistorius, J.C.C. 2002. **A Cultural Heritage Impact Assessment for the Proposed New Open Pit for PPRust on the Farm Zwartfontein 818 LR in the Northern Province of South Africa. Amendment to the PPRust Environmental Management Programme Report (EMPR).** An unpublished report by Archaeologist and Cultural Heritage Management Consultants on file at SAHRA as 2002-SAHRA-0081.

Küsel, U. 2005. **Cultural Heritage Resources Impact Assessment on Malokong Hill.** An unpublished report by African Heritage Consultants CC on file at SAHRA as 2005-SAHRA-0053.

Murimbika, M. 2006. **Archaeological Impact Assessment Study for the Proposed Construction of Electricity Distribution Powerlines Within, Limpopo Province.** An unpublished report by Nzumbululo Heritage Solutions on file at SAHRA as 2006-SAHRA-0354.

Fourie, W. & van der Walt, J. 2006. **Heritage Impact Assessment: Paarl Eco Estate Portion 2 of the Farm Paarl 522 LQ, near Ellisras (Lephalale) in the Suburb of Onverwacht, Limpopo Province.** An unpublished report by Matakoma Heritage Consultants (Pty) Ltd on file at SAHRA as 2006-SAHRA-0416.

Roodt, F. 2007a. **Phase 1 Heritage Impact Assessment (Scoping & Evaluation) Labonte 5 Mine Lephalale, Limpopo.** An unpublished report by R & R Cultural Resource Consultants on file at SAHRA as 2007-SAHRA-0101.

Roodt, F. 2007b. **Phase 1 Heritage Resources Impact Assessment (Scoping & Evaluation) Legola View Estate Development Lephalale (Ellisras), Limpopo.** An unpublished report by R & R Cultural Resource Consultants on file at SAHRA as 2007-SAHRA-0384.

Roodt, F. 2008a. **Phase 1 Heritage Resources Scoping Report Mogalakwena Bulk Water Supply Scheme - Phase 1 of Zone 1 Mokopane: Limpopo.** An unpublished report by R & R Cultural Resource Consultants on file at SAHRA as 2008-SAHRA-0263.

Roodt, F. 2008b. **Phase 1 Heritage Resources Scoping Report Residential Development Sepharane, Limpopo.** An unpublished report by R & R Cultural Resource Consultants on file at SAHRA as 2008-SAHRA-0324.

Van Vollenhoven, A.C. 2008. **A Report on a Cultural Heritage Impact Assessment for the Proposed Housing Development at Erf 1522 Elliras on the Farm Onverwacht 503 LQ, Lephale, Limpopo Province.** An unpublished report by Archaetnos CC on file at SAHRA as 2008-SAHRA-0658.

Researching the SAHRIS online database (<http://www.sahra.org.za/sahris>) further studies were identified in the wider vicinity of the study area:

SAHRIS case number 2245. 2011. **Consultation in terms of Section 40 of the Mineral and Petroleum Resources Development Act 2002, (Act 28 of 2002) for the approval of an Environmental Management Plan for mining permit in respect of the remaining extent of the farm Dooringsloot 36 KR, situated in the Magisterial District of Waterberg: Limpopo region [sic].**

SAHRIS case number 2264. 2011. **Consultation in terms of Section 40 of the Mineral and Petroleum Resources Development Act 2002, (Act 28 of 2002) for the approval of scoping report of Grootgeluk Coal Mine on the farm Grootgeluk 459 LQ and other various farms in the District of Lephale.**

SAHRIS case number 569. 2012. **Heritage Impact Assessment for the Proposed Thabametsi Project, Lephale, Limpopo Province.**

SAHRIS case number 916. 2012. **Intergrated [sic] water and waste management plan amendment.**

SAHRIS case number 1469. 2013. **Proposed excavation of the site of Thaba Nkulu, Limpopo Province.**

SAHRIS case number 1531. 2013. **Proposed development area the remainder of the farm Hanover 181 KQ the remainder of Portion 3 of the farm Groenfontein 207 KQ and the farm Keerom 208 KQ.**

SAHRIS case number 1647. 2013. **Final Scoping Report for the Amendment of EMP Report for Sekoko Waterberg Colliery, Limpopo Province Submitted in support of an amendment to existing EMP (Mining Right Ref No: LP30/5/1/2/2/184 MR) and NEMA Application.**

SAHRIS case number 3646. 2013. **Proposed Township Development (4 700 erven) on Remainder of Richards' Lager 124 LR, Lephalale Local Municipality, Waterberg District, Limpopo Province.**

SAHRIS case number 671. 2012. **Sekoko Railway Siding: Hooikraal 315 LQ, Buffelsjagt 317 LQ and Verguld Helm 316 LQ, Lephalale Municipality, Limpopo Province.**

Four of the listed studies in the APM and SAHRIS databases had no documentation available (Gaigher 2002; SAHRIS case number 2245; SAHRIS case number 2264; SAHRIS case number 671). A number of studies located no heritage resources (e.g. Murimbika 2006; Fourie & van der Walt 2006; Roodt 2007a; SAHRIS case number 3646; SAHRIS case number 1531) and one study motivated against further Historical Impact Assessments based on the unlikelihood of archaeological/historical remains (SAHRIS case number 916).

About 20 kilometres to the south east of the study area is the site of Thaba Nkulu, the ceramics from which (including Diamant facies) suggest continuous use of the area from the first millennia AD and which has significant metal working remains. The site was originally identified when pots became exposed in a road (SAHRIS case number 1469). Some 13 km to the south east of the study area Roodt (2007b) found a surface scattering of Middle Stone Age material. Some 60 km to the west in the vicinity of Lephalale, studies (principally for coal mining) have found a significant number of heritage resources. One such study, for example, found a number of surface Iron Age ceramics, 8 Middle Stone Age flakes/tools and a scattering of stone age remains, 2 historical houses and 8 recent graves (SAHRIS case number 569)

Some 80 km to the south east of this study Pistorius (2002) located and recommended mitigation measures for graves, ruins of historical buildings, historical buildings and historical mines in another area of planned open-cast mining. In the same area Küsel (2005) undertook a cultural heritage resources impact assessment on Molokong Hill in which he documented the oral history of the long settlement of the hill by the Northern Ndebele Mabusela clan as well as the presence of Moloko tradition pottery and the presence of Middle Stone Age material. In a survey for a bulk water supply route further to the south west Roodt (2008a) identified a number of graves and suggested mitigation measures. In the same area a survey of a proposed residential development found an Iron Age Site characterised by Madikwe ceramics of the Moloko Branch dating to between 1300 and 1500 A.D. (Roodt 2008b).

Archaeological & Historical Sequence

The historical background and timeframe of the study area and other areas in Southern Africa can be divided into the Stone Age, Iron Age and Historical period. These can be divided as follows:

Stone Age sites

The Stone Age is divided into the Early; Middle and Late Stone Age. The *Early Stone Age* includes the period from 2.5 million years B.P. to 250 000 years B.P. and is associated with Australopithecines and early *Homo* species who practiced stone tool industries such as the Oldowan and Acheullian. The *Middle Stone Age* covers various tool industries, for example the Howiesons Poort industry, in the period from 250 000 years B.P. to 25 000 years B.P. and is associated with archaic and modern *Homo sapiens*. The *Late Stone Age* incorporates the period from 25 000 years B.P. up to the Iron Age and Historical Periods and contact between hunter-gatherers and Iron Age farmers or European colonists. This period is associated with modern humans and characterised by lithic tool industries such as Smithfield and Robberg.

Excavations at Makapansgat approximately east of the study area provided evidence of occupation by *Australopithecus africanus* from approximately 3.3 million years ago. There is evidence of long occupation from the Cave of Hearths with stone tools and associated debris from a date of 400,000 B.P. while upper strata are characterised by Middle Stone Age assemblages of 110,000 to 50,000 B.P. and Late Stone Age assemblages dating from 10,000 to 5,000 years B.P. characterised by the Smithfield B industry. The site is one of the few to exhibit Acheulean assemblages in Southern Africa and also contains overlying Middle Stone Age Howiesonspoort industry tools and early evidence of fire use (Bergh, 1999; Mitchell, 2002). A number of MSA sites are known from the wider region including an MSA layer in the Olieboompoort Shelter dated to 33 000 year B.P. (Mason 1962) and MSA sites at New Belgium 608 LR, Schurfpoot 112 KR and Goergap 113 KR (Birkholtz & Steyn 2002). Interestingly, research on the LSA in the Waterberg Plateau suggests a discontinuity between MSA and LSA settlement of several thousand years, with settlement of the area by LSA hunter gatherers occurring in the 11th and 12th Centuries and coinciding with settlement by Iron Age peoples (van der Ryst, 1998).

No known rock art sites in the direct vicinity of the study area were referenced in the literature. However, immediately to the south the Waterberg is known for its many rock art sites including

those containing shaded paintings such as at Haakdoorndraai (Pager, 1973) and the depiction of a fat tailed sheep at Dwaalhoek (van der Ryst, 1998). To the north-west the Makgabeng plateau has over 460 recorded rock art sites (Eastwood et. al., 2002). Evidence from Late Stone Age tool sites also attests to the long occupation of the area by hunter-gatherers.

Iron Age

The Iron Age incorporates the arrival and settlement of Bantu speaking people and overlaps the Pre-Historic and Historical Periods. It can be divided into three phases. The *Early Iron Age* includes the majority of the first millennium A.D. and is characterised by traditions such as Happy Rest and Silver Leaves. The *Middle Iron Age* spans the 10th to the 13th Centuries A.D. and includes such well known cultures as those at K2 and Mapungubwe. The *Late Iron Age* is taken to stretch from the 14th Century up to the colonial period and includes traditions such as Icon and Letaba.

A number of Early Iron Age sites are known from the wider area representative of two distinct pottery assemblages. The oldest assemblage belongs to the Mzonjani facies of the Urewe tradition and dates to between 450 and 750 A.D. The Kulundu tradition is represented in the wider area by the Doornkop and Diamant facies which date to between 750 and 1000 A.D. The Middle Iron Age is represented in the area by the Eiland facies of the Kulundu tradition, dating from between 1000 and 1300 A.D. Around the town of Mokopane to the south east of the study area several Late Iron Age sites are characteristic of the continuing Kalundu tradition, belonging either to the Icon facies (1300 to 1500 A.D.) or the Madikwe facies (1500 to 1700 A.D.) (Huffman, 2007).

The earliest Iron Age site in the region lies south east of the study area at Ongelukskraal 48 KR, dated to 140 A.D. and is associated with the Bambata ceramic typology (van der Ryst 1998). Research on the Waterberg Plateau and within the Motlhabatsi (Matlabas) River valley to the south of the study area and in the Rooiberg area further to the south has indicated three phases of Early Iron Age settlement. The first phase is characterised by ceramics of the Western Stream similar to those from Happy Rest and Klein Africa and dated to Circa 570 A.D. (Huffman 1990; van der Ryst 1998). The second phase, circa 700 A.D., is similar to the Rooiberg Unit 1 (Hall 1981; Huffman 1990) ceramics described from the vicinity of the study area and the third phase, circa 1000 A.D. is associated with the Eiland tradition, marking the end of the Early Iron Age in the area (Huffman 1990). The site at Diamant north of the study area on the western edge of the Waterberg has yielded Middle Iron Age imported glass beads like those excavated at Schroda on

the Limpopo, the latter being the likely centre of distribution for this early trade (Huffman 2007).

Successive waves of both homogenous and heterogeneous groups entered and occupied the wider area since 1600 A.D., the latter including Ndebele, Shangaan and Koni people (Loubser, 1994). During the 17th Century Iron Age Nguni farmers moved from the Hlubi tribe in present day Kwa-Zulu Natal and settled in the former Transvaal as the Transvaal Ndebele. They were split into two major groupings of which the Northern Ndebele settled in the Mokopane - Polokwane region. While it is not clear which groups they settled alongside or displaced, several accounts of contact with the Northern-Sotho and Ba-Pedi are reported in the ethnology of these peoples.

The people currently living in the vicinity of the study site are Bakoni, an offshoot of the Northern Sotho who first settled in the area around modern day Polokwane around 1730 A.D. (Krige, 1937) before moving north and west towards Makgabeng and founding a settlement at Ga Matlala a' Thaba. The Koni are not a homogenous group and most of the Koni people regard their ancestry as being Nguni and originating in Swaziland (Mönnig, 1967). Excavations in 1980 by the University of the Witwatersrand at the site of the Bokoni Malapa museum south of Polokwane indicated settlement from 1600 to 1900 A.D. comprising a sequence of Northern Ndebele, Northern Sotho and Shangaan people, finally being occupied by the Koni of Matlala (Jordaan, 1992).

Historical Period

The beginning of the Historical Period overlaps the demise of the late Stone and Iron Ages and is characterised by the first written accounts of the region from 1600 A.D. to the present.

Early European travellers, hunters and missionaries such as Cornwallis Harris and Robert Moffat visited the region in the 1830's and they were followed by the first settlers in the Waterberg area in the late 1830's who initially sustained themselves through hunting, particularly of elephant, before the emergence of cattle farming and later, agriculture (Pont 1965; Naudé 1998). Considerable tensions arose between the settlers and the local people and there were a number of skirmishes including the famous siege of the Ndebele ruler Mokopane in the Makapans caves and the forced abandonment of Potgietersrust in 1870. Under the increasingly European control of the area French and German missionaries became active (Loubser, 1994). Christoph Sonntag's account of the Maleboch War makes considerable mention of the Boers using Matlala or 'Matlaleo' Commandos recruited from the area of Ga Matlala to the east to

fight in the battle against the Bahananoa of the Blouberg but no fighting took place in the vicinity of Matlala (Sonntag, Undated). The outbreak of the Boer War in 1899 had a considerable impact on the region to the south with many Boer homesteads abandoned or destroyed as part of the British scorched earth policy and many women and children interned in concentration camps, one located in then-Nylstroom. Black involvement in the war in the Waterberg region was significant with the Kgatla under Linchwe 1 taking the side of the British and becoming actively involved in the fighting (Birkholtz & Steyn 2002).

6 FIELDWORK FINDINGS

A systematic walkthrough of the study area was undertaken by a fieldwork team comprising an archaeologist and a field assistant. Each member of the team carried a hand-held GPS, and their track logs are depicted in black on the maps provided. **No heritage sites could be identified.**


Ga Phaladira Shopping Centre Development



0 0.25 0.5
Kilometres

1:7,500



 Study area

 Track log

Image: 2328C.jp2
Source: Spot Image / CSIR
Datum: WGS84
Study Area: Part of the farm Kroonstad 468 LR

Figure 10 – The proposed study area with track log.

Ga Phaladira Shopping Centre Development

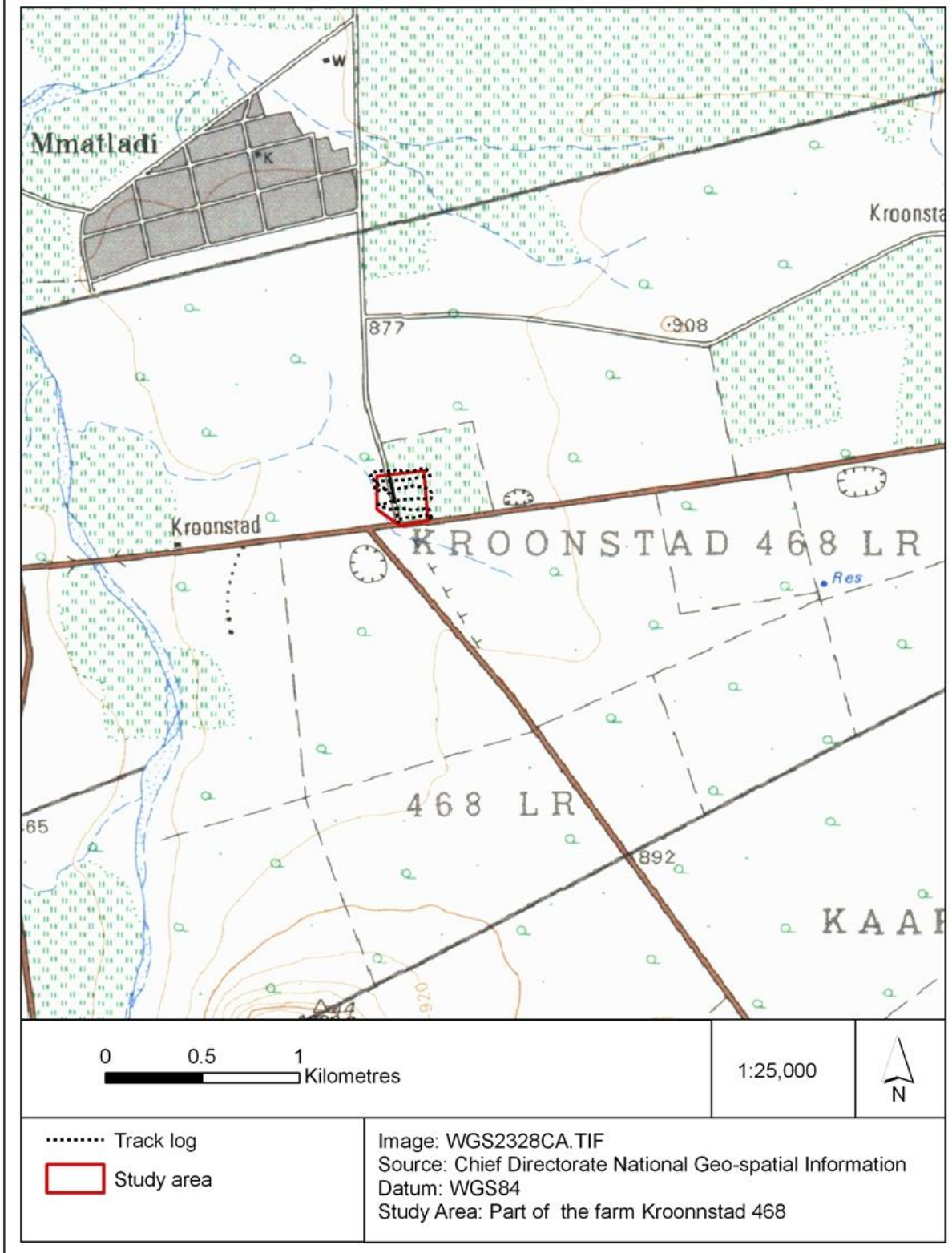


Figure 11 – The proposed study area in relation to the bigger area.

Ga Phaladira Shopping Centre Development



0 0.5 1 Kilometres

1:25,000



..... Track log
Study area

Image: 2328C.jp2
Source: Spot Image / CSIR
Datum: WGS84
Study Area: Part of the farm Kroonstad 468 LR

Figure 12 – The proposed study area in relation to the bigger area.

7 IMPACT OF PROPOSED DEVELOPMENT ON HERITAGE RESOURCES

The development of the proposed shopping centre will have no impact on any heritage sites. No heritage sites were identified within the study area. As a result the impact of the proposed development on known heritage resources can be considered to be nil.

8 MITIGATION MEASURES AND GENERAL RECOMMENDATIONS

No heritage sites were identified within the study area and no mitigation measures are required.

9 CONCLUSIONS

PGS Heritage was appointed by Tekplan Environmental to undertake a Heritage Impact Assessment (HIA) which forms part of the Environmental Impact Assessment (EIA) for the proposed development of a shopping centre on Portion 1 of the Farm Kroonstad 468 LR, west of Marken in the Mogalakwena Local Municipality, Waterberg District, Limpopo Province.

An archival and historical desktop study was undertaken which was used to compile a historical layering of the study area within its regional context. This component indicated that the landscape within which the project area is located has a rich and diverse history. However, the desktop study did not reveal any historic or heritage sites from within the study area.

The desktop study work was followed by a fieldwork component which comprised a walkthrough of the study area. **No heritage sites were identified within the study area.**

The development is not expected to have any impact on heritage sites. As such no heritage reasons can be given for the development not to continue.

10 REFERENCES

- Bergh, J.S. 1999. Geskiedenisatlas van Suid-Afrika. Die vier Noordelike Provinsies. Pretoria: J.L. van Schaik.
- Birkholtz, P.D. & Steyn, H.S. 2002 Cultural Resource management Plan for Marakele National Park. Produced for SANParks, Report: SANP – MNP - 2002-05-17/Final Report. Helio Alliance.
- Eastwood, E., van Schalkwyk, J. & Smith, B. 2002. Archaeological and Rock Art Survey of the Makgabeng Plateau, Central Limpopo Basin. *The Digging Stick*. Vol. 19, No. 1.
- Hall, S.L. 1981 Iron Age sequence and settlement in the Rooiberg, Thabazimbi Area. M.A. Thesis, University of the Witwatersrand.
- Huffman, T. N., 1990. The Waterberg Research of Jan Aukema. *South African Archaeological Bulletin*, 45:117-119.
- Huffman, T.N. 2007. Handbook to the Iron Age. The Archaeology of Pre-Colonial Farming Societies in Southern Africa. Durban: University of KwaZulu-Natal Press.
- Jordaan, J. 1992. The Bakoni Malapa Museum: Establishment and Management. Commissioned by the Town Council of Pietersburg (now Polokwane). Review Printers.
- Krige, J.D. 1937. Traditional origins and tribal relationships of the Sotho of the Northern Transvaal. *Bantu Studies*. II.
- Loubser, J.H.N. 1994. Ndebele Archaeology of the Pietersburg Area. *Navorsing van die Nasionale Museum Bloemfontein*. Vol. 10, Part 2.
- Mason, R.J. 1962. Prehistory of the Transvaal. University of the Witwatersrand Press, Johannesburg.
- Mitchell, P. 2002. *The Archaeology of Southern Africa*. Cambridge: Cambridge University Press.
- Mönnik, H.O. 1967. The Pedi. Pretoria: J.L. van Schaik.

Naudé, M., 1998. Oral Evidence of Vernacular Buildings and Structures on Farmsteads in the Waterberg (Northern Province). Research by the National Cultural History Museum, 7:47-91.

Pager, H. 1973. Shaded rock-paintings in the Republic of South Africa, Lesotho, Rhodesia and Botswana. The South African Archaeological Bulletin.

Pont, A.D., 1965. Die Nededuitsch Hervormde Gemeente Waterberg. Kerkraad van die Nederduitsch Hervormde Gemeente Waterberg. Krugersdorp.

South African Heritage Resources Agency, 2009. Archaeology and Palaeontology Report Mapping Project. DVD Version 1.0. Cape Town.

South African Heritage Resources Information System, <http://www.sahra.org.za/sahris>. Accessed 8th October 2013.

Sonntag, C. Undated. My friend Maleboch, Chief of the Blue Mountains. An Eye-Witness Account of the Maleboch War of 1894 from the Diary of Christoph Sonntag. Pretoria: Sigma Press.

Van der Ryst, M.M., 1998. The Waterberg Plateau in the Northern Province, Republic of South Africa, in the Later Stone Age. BAR International Series 715, Archaeopress, Oxford.

LEGISLATIVE REQUIREMENTS – TERMINOLOGY AND ASSESSMENT CRITERIA

General principles

In areas where there has not yet been a systematic survey to identify conservation worthy places, a permit is required to alter or demolish any structure older than 60 years. This will apply until a survey has been done and identified heritage resources are formally protected.

Archaeological and palaeontological sites, materials, and meteorites are the source of our understanding of the evolution of the earth, life on earth and the history of people. In terms of the heritage legislation, permits are required to damage, destroy, alter, or disturb them. Furthermore, individuals who already possess heritage material are required to register it. The management of heritage resources is integrated with environmental resources and this means that, before development takes place, heritage resources are assessed and, if necessary, rescued.

In addition to the formal protection of culturally significant graves, all graves which are older than 60 years and are not located in a cemetery (such as ancestral graves in rural areas), are protected. The legislation also protects the interests of communities that have an interest in the graves: they should be consulted before any disturbance takes place. The graves of victims of conflict and those associated with the liberation struggle are to be identified, cared for, protected and memorials erected in their honour.

Anyone who intends to undertake a development must notify the heritage resources authority and, if there is reason to believe that heritage resources will be affected, an impact assessment report must be compiled at the construction company's cost. Thus, the construction company will be able to proceed without uncertainty about whether work will have to be stopped if an archaeological or heritage resource is discovered.

According to the National Heritage Act (Act 25 of 1999 section 32) it is stated that:

An object or collection of objects, or a type of object or a list of objects, whether specific or generic, that is part of the national estate and the export of which SAHRA deems it necessary to control, may be declared a heritage object, including –

- objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects, meteorites and rare geological specimens;
- visual art objects;

- military objects;
- numismatic objects;
- objects of cultural and historical significance;
- objects to which oral traditions are attached and which are associated with living heritage;
- objects of scientific or technological interest;
- books, records, documents, photographic positives and negatives, graphic material, film or video or sound recordings, excluding those that are public records as defined in section 1 (xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996), or in a provincial law pertaining to records or archives; and
- any other prescribed category.

Under the National Heritage Resources Act (Act No. 25 of 1999), provisions are made that deal with, and offer protection to, all historic and prehistoric cultural remains, including graves and human remains.

Graves and cemeteries

Graves younger than 60 years fall under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance no. 7 of 1925) as well as the Human Tissues Act (Act 65 of 1983) and are under the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the Office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning, or in some cases the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. In order to handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

Graves older than 60 years, but younger than 100 years, fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act) as well as the Human Tissues Act (Act 65 of 1983) and are under the jurisdiction of the South African Heritage Resources Agency (SAHRA). The procedure

for Consultation regarding Burial Grounds and Graves (Section 36(5) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in the category located inside a formal cemetery administrated by a local authority will also require the same authorisation as set out for graves younger than 60 years, over and above SAHRA authorisation.

If the grave is not situated inside a formal cemetery but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws set by the cemetery authority must be adhered to.