

Archaetnos Culture & Cultural Resource Consultants BK 98 09854/23

A REPORT ON A CULTURAL HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED ESKOM GELUK RURAL POWERLINE, CLOSE TO BRITS, NORTHWEST PROVINCE

For:

Landscape Dynamics PO Box 947 Groenkloof 0027

REPORT: AE01367V

By:

Dr. A.C. van Vollenhoven (L.AKAD.SA.) Accredited member of ASAPA Professional member of SASCH

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

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

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SUMMARY

Archaetnos cc was requested by Landscape Dynamics to conduct a cultural heritage impact assessment for the proposed ESKOM Geluk Rural power line. This is close to Brits in the Northwest Province. Three options for the route were investigated.

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

During the survey no sites of cultural heritage significance was located in the area to be developed. Two sites, fairly close thereto were however identified. These may influence the placement of the line and therefore option 2 is recommended. No mitigation is necessary on this option and the development may therefore continue on this option.

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

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1. INTRODUCTION

Archaetnos cc was requested by Landscape Dynamics to conduct a cultural heritage impact assessment for the proposed ESKOM Geluk Rural power line. This is close to Brits in the Northwest Province. Three options for the route were investigated (Figure 1-5).

The client indicated the area where the proposed development is to take place. The field survey was confined to this area.



Figure 1 Location of the site and the town of Brits in the Northwest Province. North reference is to the top of the map.

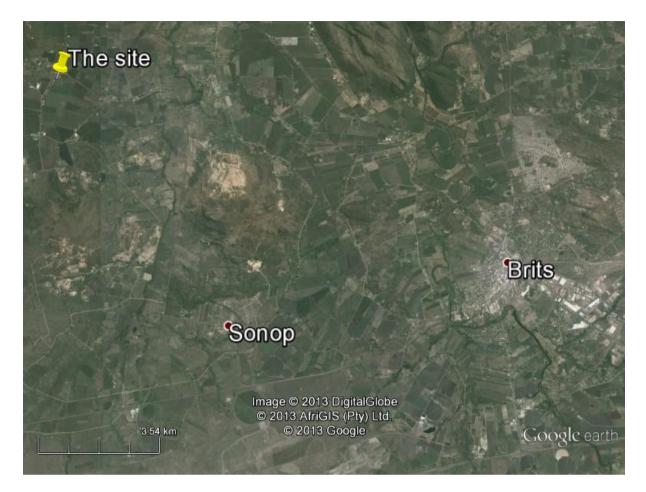


Figure 2 Location of the surveyed area in relation to the town of Brits. North reference is to the top.

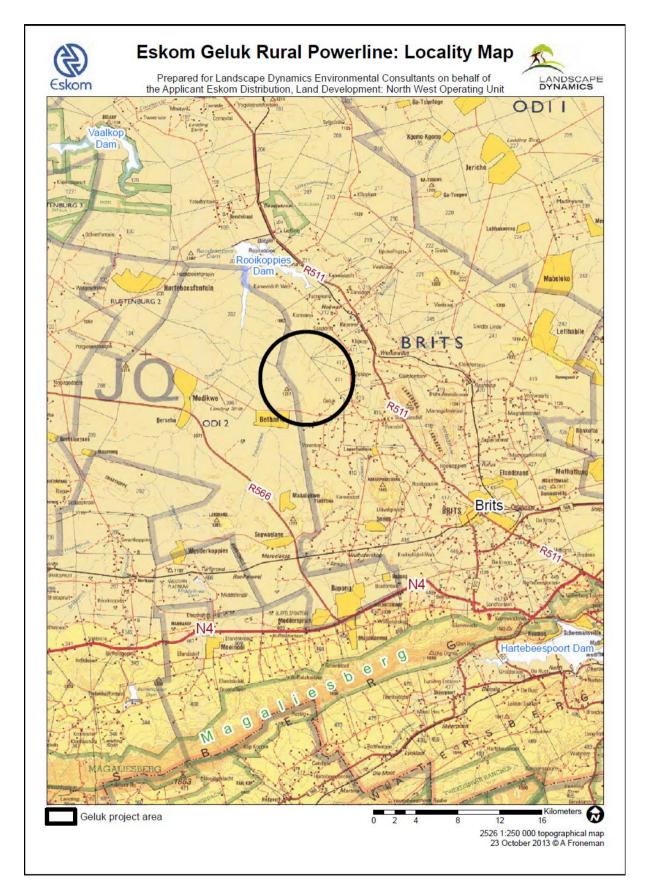


Figure 3 The project area.

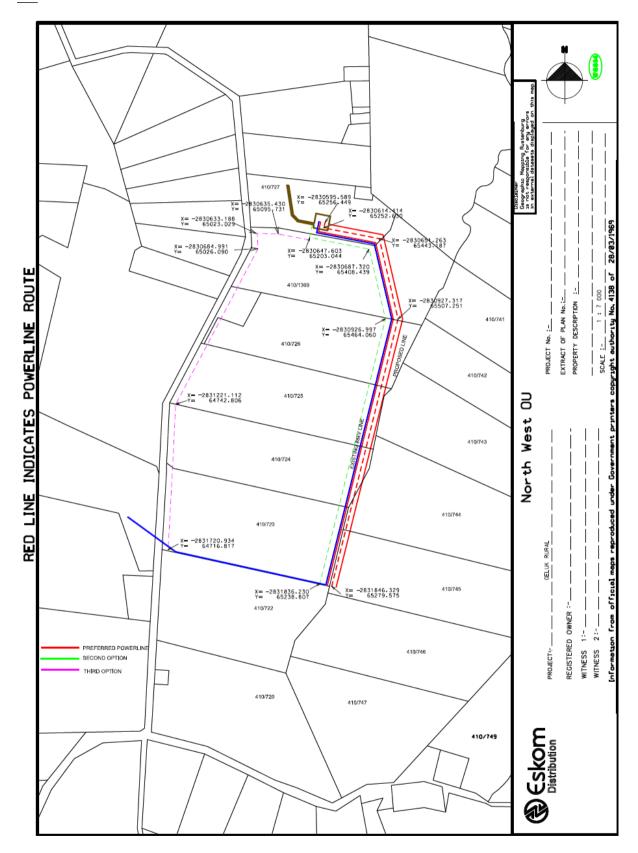


Figure 4 Layout of the three proposed route options.



Figure 5 Google image of the surveyed area indicating the three options for the power line:

Red – Preferred option Green – Option2 Purple – Option 3

2. TERMS OF REFERENCE

The Terms of Reference for the survey were to:

- 1. Identify objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located on the property (see Appendix A).
- 2. Study background information on the area to be developed.
- 3. Assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value (see Appendix B).
- 4. Describe the possible impact of the proposed development on these cultural remains, according to a standard set of conventions.

- 5. Recommend suitable mitigation measures to minimize possible negative impacts on the cultural resources by the proposed development.
- 6. Review applicable legislative requirements.

3. CONDITIONS & ASSUMPTIONS

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

- Cultural Resources are all non-physical and physical man-made occurrences, as well as natural occurrences associated with human activity (Appendix A). These include all sites, structure and artifacts of importance, either individually or in groups, in the history, architecture and archaeology of human (cultural) development. Graves and cemeteries are included in this.
- 2. The significance of the sites, structures and artifacts is determined by means of their historical, social, aesthetic, technological and scientific value in relation to their uniqueness, condition of preservation and research potential. The various aspects are not mutually exclusive, and the evaluation of any site is done with reference to any number of these aspects.
- 3. Cultural significance is site-specific and relates to the content and context of the site. Sites regarded as having low cultural significance have already been recorded in full and require no further mitigation. Sites with medium cultural significance may or may not require mitigation depending on other factors such as the significance of impact on the site. Sites with a high cultural significance require further mitigation (see Appendix C).
- 4. The latitude and longitude of any archaeological or historical site or feature, is to be treated as sensitive information by the developer and should not be disclosed to members of the public.
- 5. All recommendations are made with full cognizance of the relevant legislation.
- 6. It has to be mentioned that it is almost impossible to locate all the cultural resources in a given area, as it will be very time consuming. Developers should however note that the report should make it clear how to handle any other finds that might occur.

4. LEGISLATIVE REQUIREMENTS

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

4.1 The National Heritage Resources Act

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

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

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

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

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

- a. The construction of a linear development (road, wall, power line canal etc.) exceeding 300m in length
- b. The construction of a bridge or similar structure exceeding 50m in length
- c. Any development or other activity that will change the character of a site and exceed 5 000m² or involve three or more existing erven or subdivisions thereof
- d. Re-zoning of a site exceeding 10 000 m²
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority

Structures

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

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

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

Archaeology, palaeontology and meteorites

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

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

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

Human remains

Graves and burial grounds are divided into the following:

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

f. human remains

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

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

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

Human remains that are less than 60 years old are subject to provisions of the Human Tissue Act (Act 65 of 1983) and to local regulations. Exhumation of graves must conform to the standards set out in the **Ordinance on Excavations** (**Ordinance no. 12 of 1980**) (replacing the old Transvaal Ordinance no. 7 of 1925).

Permission must also be gained from the descendants (where known), the National Department of Health, Provincial Department of Health, Premier of the Province and local police. Furthermore, permission must also be gained from the various landowners (i.e. where the graves are located and where they are to be relocated) before exhumation can take place.

Human remains can only be handled by a registered undertaker or an institution declared under the **Human Tissues Act** (Act 65 of 1983 as amended).

4.2 The National Environmental Management Act

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

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

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

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

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

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

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

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

6. METHODOLOGY

6.1 Survey of literature

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

6.2 Field survey

The survey was conducted according to generally accepted HIA practices and was aimed at locating all possible objects, sites and features of cultural significance in the

area of proposed development. One regularly looks a bit wider than the demarcated area, as the surrounding context needs to be taken into consideration.

If required, the location/position of any site was determined by means of a Global Positioning System (GPS)¹, while photographs were also taken where needed. The survey was undertaken by a physical survey via off-road vehicle and on foot (Figure 6). The length of the proposed route is approximately 1.7 km and the survey took 2 hours to complete.



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

6.3 Oral histories

People from local communities are interviewed in order to obtain information relating to the surveyed area. It needs to be stated that this is not applicable under all circumstances. When applicable, the information is included in the text and referred to in the bibliography.

¹ A Garmin Oregon 550 with an accuracy factor of a few meters.

6.4 Documentation

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

6.5 Evaluation of Heritage sites

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

- The unique nature of a site
- The integrity of the archaeological deposit
- The wider historic, archaeological and geographic context of the site
- The location of the site in relation to other similar sites or features
- The depth of the archaeological deposit (when it can be determined or is known)
- The preservation condition of the site
- Uniqueness of the site and
- Potential to answer present research questions.

7. DESCRIPTION OF THE ENVIRONMENT

The proposed linear development area that was investigated shows two basic environmental characteristics. The preferred option runs from the Geluk Rural substation (Figure 7), parallel to agricultural fields in an easterly direction. It seems as if it will cross a hill, which shows natural vegetation (Figure 8). The route then goes to the south, following agricultural fields where it links up with an existing power line (Figure 9).

The second option follows the same directions, but only goes along agricultural fields where it links up with the same power line as option 1 (Figure 10). It is located to the south and west of the preferred option.

The third option runs from the substation in a westerly direction where a few trees are situated along agricultural fields (Figure 11-12). It then also turns to the south where it follows a road along agricultural fields and eventually also links up with the mentioned power line. In the process it crosses a few farm yards.

Apart from the mentioned hill which shows natural vegetation, the rest of the area has been disturbed by recent human interventions, as mentioned, agricultural fields. Apart from the hill, the slope of the surveyed area is very gentle.



Figure 7 The Geluk Rural Substation.



Figure 8 The hill which most likely will be crossed if the preferred alternative is chosen.



Figure 9 The power line along agricultural fields with which the proposed power line will link up.



Figure 10 Agricultural fields along the preferred option and option2.



Figure 11 Trees along route option 3.



Figure 12 Agricultural fields along route option 3.

8. HISTORICAL CONTEXT

No sites of cultural heritage significance were on any of these routes, but two sites that are reasonably close were identified. In order to enable the reader to

contextualize these and to understand possible finds that may be unearthed during construction activities and the history of the broader geographical area, it is necessary to give a background regarding the different phases of human history.

8.1 Stone Age

The Stone Age is the period in human history when lithic material was mainly used to produce tools (Coertze & Coertze 1996: 293). In South Africa the Stone Age can be divided in three periods. It is, however, important to note that dates are relative and only provide a broad framework for interpretation. The division for the Stone Age according to Korsman & Meyer (1999: 93-94) is as follows:

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

The closest known Stone Age site in the vicinity of Brits is a rock art site to the northwest. Rock engravings are found to the south and east of Rustenburg (the latter lying to the west of the surveyed area). These date back to the Late Stone Age (Bergh 1999: 5).

No natural shelter was identified, but the larger geographical area includes many hills where such shelters may exist. The area probably provided good grazing and therefore it is possible that Stone Age people may have utilized the site for hunting purposes. One may therefore find Stone Age material out of context lying around, although none was identified during the survey.

8.2 Iron Age

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

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

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

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

Many Late Iron Age sites have been identified in the area around the towns of Brits and Rustenburg as well as in the Waterberg Mountains. This includes the surveyed area (Bergh 1999: 7-8). During earlier times the area was inhabited by Tswana groups, namely the Fokeng and Hurutshe. In the 19th century and even today, the area is inhabited by other Tswana groups, namely the Kwena, Tlokwa, Phiring,

Taung and the Fokeng (Bergh 1999: 9-10). During the Difaquane these people moved further to the north and south, but they returned later on (Bergh 1999: 11).

One of the sites identified during the survey is a typical Late Iron Age stone walled complex. It also is clear from the above mentioned that Iron Age people probably utilized this area as it would have provided good grazing for livestock. People would however more than likely have resided closer to and on the slopes of the hills in the area.

8.3 Historical Age

The Historical Age started with the first historical sources which can be used to learn more about people of the past. In South Africa it can be divided into two phases. The first includes oral histories as well as the recorded oral histories of past societies. The latter were usually written by people who contact with such a community for a short time. This is followed by the second phase which includes the moving into the area of people that were able to read and write (Van Vollenhoven 2005: 189). This era is sometimes called the Colonial era or the recent past.

Due to factors such as population growth and a decrease in mortality rates, more people inhabited the country during the recent historical past. Therefore and because less time has passed, much more cultural heritage resources from this era have been left on the landscape. It is important to note that all cultural resources older than 60 years are potentially regarded as part of the heritage and that detailed studies are needed in order to determine whether these indeed have cultural significance. Factors to be considered include aesthetic, scientific, cultural and religious value of such resources.

Early travelers have moved through this part of the Northwest Province. This included Coenraad de Buys in 1821 and 1825, David Hume in 1825, Robert Scoon and William McLuckie in 1827 and 1829 and Dr. Robert Moffat and Reverend James Archbell in 1829 (Bergh 1999: 12, 117-119).

Hume again moved through this area in 1830 followed by the expedition of Dr. Andrew Smith in 1835 (Bergh 1999: 13, 120-121). Hume again moved through the area with Scoon in 1835. In 1836 William Cornwallis Harris visited the area. The well-known explorer Dr. David Livingston passed through this area in 1847 (Bergh 1999: 13, 119-122).

In 1837 the Voortrekkers also moved through the Swartruggens area (Bergh 1999: 11), but this is much further to the west. During this year a Voortrekker commando moved out against Mzilikazi and was engaged in a battle with his impi to the north of Swartruggens. The area surveyed was inhabited by white settlers as early as 1839 (Bergh 1999: 14-15).

The greater Magaliesberg and Rustenburg area saw much action during the Anglo-Boer War (1899-1902). British troops reached Rustenburg on 14 June 1900. Three battles were fought here during the War, being the one at Buffelspoort on 3 December 1900, the one at Nooitgedacht on 13 December 1900 and the one at Vlakfontein on 29 May 1901 (Bergh 1999: 51-52).

Historical structures, such as farm houses and infrastructure may therefore be found in the area. The surveyed area however is very flat meaning that it would not have had any military advantage and therefore it may not have been utilized for this purpose during wars.

9. SITES IDENTIFIED DURING THE SURVEY

As indicated two cultural heritage sites were identified close to two of the route options. As these may be impacted on, it will be discussed briefly.

Preferred Route:

Some Late Iron Age stone walling was identified along the south-eastern slope of the hill indicated on this route (Figure 13). The walling seems to be reasonably high, but it does not seem to be a large site.

GPS: 25°34'53.18"S 27°39'3.85"E



Figure 13 Late Iron Age stone walling against the slope of the hill along the preferred option.

The site is regarded as having a medium cultural heritage significance. It is rewarded a field rating of local grade IIIB. it needs to be included in the heritage register and may be mitigated. However, it would be better to steer clear of the site.

Route option 2:

No cultural heritage sites, features or objects were identified on this route.

Route option3:

A lovely little Edwardian cottage (Figure 14) was identified across the road from where the power line will be placed if option 3 is chosen. It is built from stone and corrugated iron and is quite typical for this era (circa 1890-1920).

GPS: 25°35'30.01"S 27°38'36.95"E



Figure 14 Edwardian cottage identified close to route option 3.

The site is regarded as having a high cultural heritage significance. It is rewarded a field rating of local grade IIIA. it needs to be included in the heritage register and may not be mitigated. However, it would be better to steer clear of the site.

10. CONCLUSION AND RECOMMENDATIONS

As indicated no sites of cultural importance were identified on any of the three route options for the power line. However, sites were found close to the preferred option

and Option 3 (Figure 15). The survey of the indicated area was completed successfully.

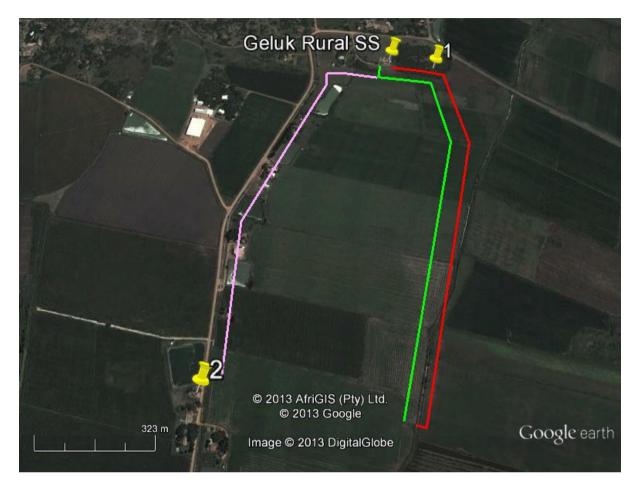


Figure 15 The two sites identified in relation to the three route options.

The following is recommended:

- From a heritage perspective, route option 2 is preferred due to the close locality of cultural heritage sites to the other options.
- No specific mitigation will be needed for the sites identified, as long as this option (2) is chosen.
- Should there be any good reason for utilizing any of the other two options, a motivation should be handed in with SAHRA. Appropriate mitigation will then have to be decided on. In the case of the Late Iron Age site it will mean to be documented by mapping and detailed photographing. In the case of the Edwardian cottage, it should however be preserved and a Conservation Management Plan (CMP) should be drafted.
- The proposed development may continue in line with these recommendations.

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

11.REFERENCES

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APPENDIX A

DEFINITION OF TERMS:

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

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

Feature: A coincidental find of movable cultural objects.

Object: Artifact (cultural object).

(Also see Knudson 1978: 20).

APPENDIX B

DEFINITION/ STATEMENT OF HERITAGE SIGNIFICANCE:

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

APPENDIX C

SIGNIFICANCE AND FIELD RATING:

Cultural significance:

- Low A cultural object being found out of context, not being part of a site or without any related feature/structure in its surroundings.
- Medium Any site, structure or feature being regarded less important due to a number of factors, such as date and frequency. Also any important object found out of context.
- High Any site, structure or feature regarded as important because of its age or uniqueness. Graves are always categorized as of a high importance. Also any important object found within a specific context.

Heritage significance:

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

Field ratings:

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

APPENDIX D

PROTECTION OF HERITAGE RESOURCES:

Formal protection:

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

General protection:

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

APPENDIX E

HERITAGE IMPACT ASSESSMENT PHASES

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