HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999)

FOR THE PROPOSED DWARSLOOP TOWNSHIP, MPUMALANGA PROVINCE

Type of development:

Township Development

Client:

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Environmental Assessment Practitioner information:

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Developer:

Nkanivo Development Consultants on behalf of Bushbuckridge Local Municipality



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Report Author: Mr. J. van der Walt <u>Project Reference:</u> HCAC Project number 2119 <u>Report date:</u> April 2021

APPROVAL PAGE

Project Name	Dwarsloop Township Development, Mpumalanga Province
Report Title	Heritage Impact Assessment for the Dwarsloop Township Development, Mpumalanga Province
Authority Reference Number	TBC
Report Status	Draft Report
Applicant Name	Bushbuckridge Local Municipality

	Name	Qualifications and Certifications	Date
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DOCUMENT PROGRESS

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Date	Report Reference Number	Description of Amendment



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REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

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Table 1. Specialist Report Requirements.

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of -	Section a
(i) the specialist who prepared the report; and	Section 12
(ii) the expertise of that specialist to compile a specialist report including a	
curriculum vitae	
(b) Declaration that the specialist is independent in a form as may be specified by the	Declaration of
competent authority	Independence
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA)an indication of the quality and age of base data used for the specialist report	Section 3.4 and 7.1.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed	9
development and levels of acceptable change;	
(d) Duration, Date and season of the site investigation and the relevance of the season	Section 3.4
to the outcome of the assessment	
(e) Description of the methodology adopted in preparing the report or carrying out the	Section 3
specialised process inclusive of equipment and modelling used	
(f) details of an assessment of the specific identified sensitivity of the site related to	Section 8 and 9
the proposed activity or activities and its associated structures and infrastructure,	
inclusive of site plan identifying site alternatives;	
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) Map superimposing the activity including the associated structures and	Section 8
infrastructure on the environmental sensitivities of the site including areas to be	
avoided, including buffers	
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(j) a description of the findings and potential implications of such findings on the impact	Section 9
of the proposed activity including identified alternatives on the environment or	
activities;	
(k) Mitigation measures for inclusion in the EMPr	Section 10.1
(I) Conditions for inclusion in the environmental authorisation	Section 10. 1.
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10. 5.
(n) Reasoned opinion -	Section 10.3
(i) as to whether the proposed activity, activities or portions thereof should be	
authorised;	
(iA) regarding the acceptability of the proposed activity or activities; and	
(ii) if the opinion is that the proposed activity, activities or portions thereof	
should be authorised, any avoidance, management and mitigation measures	
that should be included in the EMPr, and where applicable, the closure plan	
(o) Description of any consultation process that was undertaken during the course of	Section 6
preparing the specialist report	
(p) A summary and copies of any comments received during any consultation process	Refer to EIA Report
and where applicable all responses thereto; and	
(q) Any other information requested by the competent authority	Section 13



Executive Summary

Leago Environmental Solutions has been appointed by Nkanivo Development Consultants on behalf of Bushbuckridge Local Municipality as an Independent Environmental Assessment Practitioner (EAP) to undertake a Scoping and Environmental Impact Assessment (EIA) process. The proposed township will be situated on the remainder of the farm Dwarsloop 248 KU in the Bushbuckridge Local Municipality within the Ehlanzeni District Municipality in the north-eastern part of the Mpumalanga Province. The proposed development site is approximately 54.24 hectares in extent and is expected to yield approximately 533 stands. HCAC was appointed to conduct a Heritage Impact Assessment (HIA) for the project and the study area was assessed on desktop level and by a non-intrusive field survey, key findings of the assessment include:

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- The study area is characterised by areas that has been extensively eroded but also by areas with dense vegetation hindering visibility and access.
- Erosion has exposed low densities of Middle Stone Age artefacts in the western portion of the study area.
- A large cemetery was identified during the survey, which will require mitigation.
- The study area is of insignificant paleontological sensitivity and no further studies are required.

The impact on heritage resources can be mitigated to an acceptable level and the proposed project can commence on the condition that the following recommendations are implemented as part of the EMPr and based on approval from SAHRA.

Recommendations:

- It is recommended that the current layout is amended so that all identified graves and cemeteries are retained *in situ* with a 30m buffer around the identified features.
- The possibility of more graves in the study area cannot be excluded and it recommended that this should be confirmed by social consultation prior to construction as well as a walk down of the area prior to vegetation clearing by the EO;
- Implementation of a chance find procedure for the project as outlined below.



Declaration of Independence

Specialist Name	Jaco van der Walt
Declaration of Independence	 I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 108 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations, that I: I act as the independent specialist in this application; I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant; I declare that there are no circumstances that may compromise my objectivity in performing such work; I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity; I will comply with the Act, Regulations and all other applicable legislation; I nave no, and will not engage in, conflicting interests in the undertaking of the activity; I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority; All the particulars furnished by me in this form are true and correct; and I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.
Date	
	30/03/2021

a) Expertise of the specialist

Jaco van der Walt has been practising as a CRM archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of ASAPA (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, KZN as well as he Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, DRC Zambia and Tanzania. Through this, he has a sound understanding of the IFC Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage.



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ABBREVIATIONS

ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
BIA: Basic Impact Assessment
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DEA: Department of Environmental Affairs (old name)
DEFF: Department of Environment, Forestry and Fisheries (new name)
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMPr: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act, 2002 (Act No. 28
of 2002)
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency
* Although EIA refers to both Environmental Impact Assessment and the E

*Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.

GLOSSARY

Archaeological site (remains of human activity over 100 years old) Early Stone Age (~ 2.6 million to 250 000 years ago) Middle Stone Age (~ 250 000 to 40-25 000 years ago) Later Stone Age (~ 40-25 000, to recently, 100 years ago) The Iron Age (~ AD 400 to 1840) Historic (~ AD 1840 to 1950) Historic building (over 60 years old)



1 Introduction and Terms of Reference:

Leago Environmental Solutions has been appointed by Nkanivo Development Consultants on behalf of Bushbuckridge Local Municipality as an Independent Environmental Assessment Practitioner (EAP) to undertake a Scoping and Environmental Impact Assessment (EIA). The proposed township will be situated on the remainder of the farm Dwarsloop 248 KU in the Bushbuckridge Local Municipality within the Ehlanzeni District Municipality in the north-eastern part of the Mpumalanga Province (Figure 1-1 to 1-4). The proposed development site is approximately 54.24 hectares in extent and is expected to yield approximately 533 stands. The HIA report forms part of the EIA and Environmental Management Programme Report (EMPr) for the development.

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial, and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes: Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, Stone Age artefacts and a large cemetery were recorded. General site conditions and features on sites were recorded by means of photographs, GPS locations and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report. SAHRA as a commenting authority under section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) require all environmental documents, compiled in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA for commenting. Upon submission to SAHRA the project will be automatically given a case number as reference. As such the EIA report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

1.1 Terms of Reference

Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical, or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed development.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project, i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).



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1.2 Project Description

The project consists of a township development in Mpumalanga as outlined in Table 2 and 3.

Table 2: Project Description

Farm and portions	Remainder of the farm Dwarsloop 248 KU			
Magisterial District	Bushbuckridge Local Municipality within the Ehlanzeni			
	District Municipality			
Central co-ordinate of the development	24°46'34.66"S and 31° 5'21.37"E			

Table 3: Infrastructure and project activities

Type of development	Township Development		
Size of development	54.24 hectares in extent		
Project Components	The proposed development entails 533 stands for:		
	 517 Residential 1 (dwelling unit) 		
	5 Business 1 (Retail)		
	3 Institutional (crèche)		
	3 Place of worship (church)		
	4 Public open spaces		
	1 Educational (Primary school)		

1.3 Alternatives

.

No alternatives were provided to be assessed although the extent of the area assessed allows for siting of the development to minimise impacts to heritage resources.





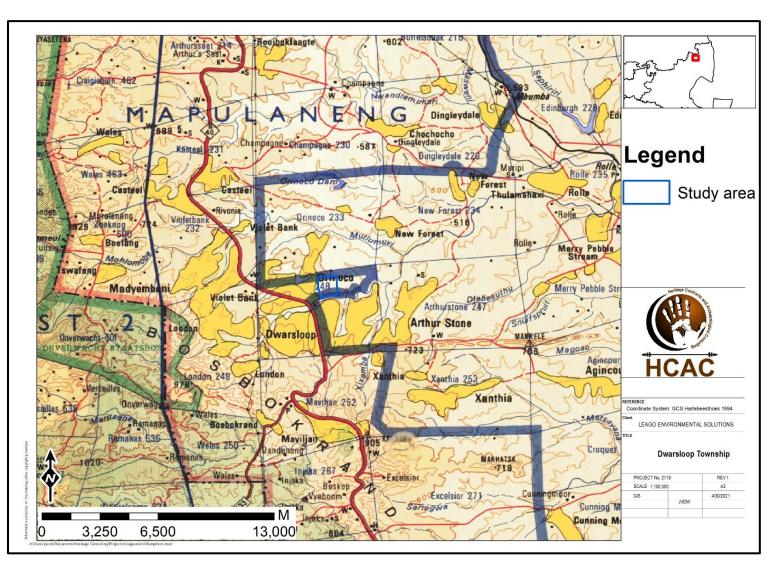


Figure 1-1. Regional setting (1: 250 000 topographical map).



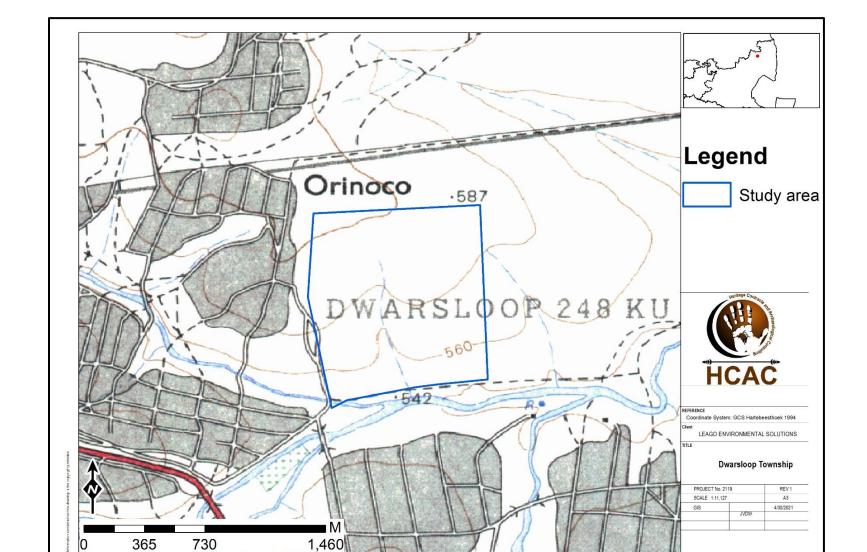


Figure 1-2: Local setting (1:50 000 topographical map) indicating the different alternatives.



April 2021

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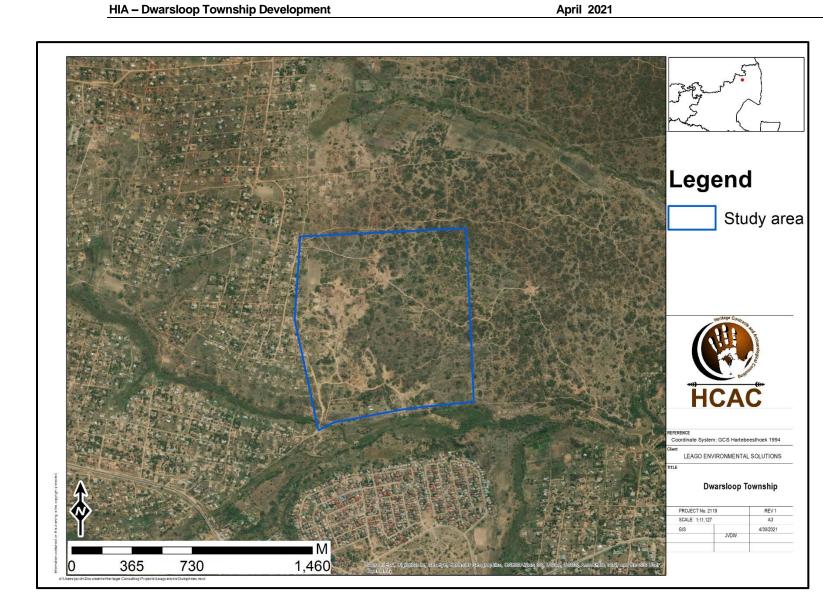


Figure 1-3. Aerial image of the development footprint.



2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 Section 23(2)(b)
- Mineral and Petroleum Resources Development Act (MPRDA), Act No. 28 of 2002 Section 39(3)(b)(iii)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the evaluation of Phase 1 HIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 HIA reports and additional development information, as per the impact assessment report and/or EMPr, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 HIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years postuniversity CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 HIA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision-making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.



Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. 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 the jurisdiction of 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 this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to 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.

Human remains that are less than 60 years old are protected 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 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. 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).

3 METHODOLOGY

3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports, and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the fieldwork phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any EIA process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings. The process involved:

- Placement of advertisements and site notices
- Stakeholder notification (through the dissemination of information and meeting invitations);
- Stakeholder meetings undertaken with I&APs;
- Authority Consultation
- The compilation of an EIA report.



3.4 Site Investigation

The aim of the site survey was to:

a) survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest;

b) record GPS points of sites/areas identified as significant areas;

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c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Table 4: Site Investigation Details

	Site Investigation
Date	22 April 2021
Season	Autumn – Some areas were inaccessible due to thick vegetation cover; however the study area was sufficiently covered to understand the heritage character of the study site. (Figure 3-1)



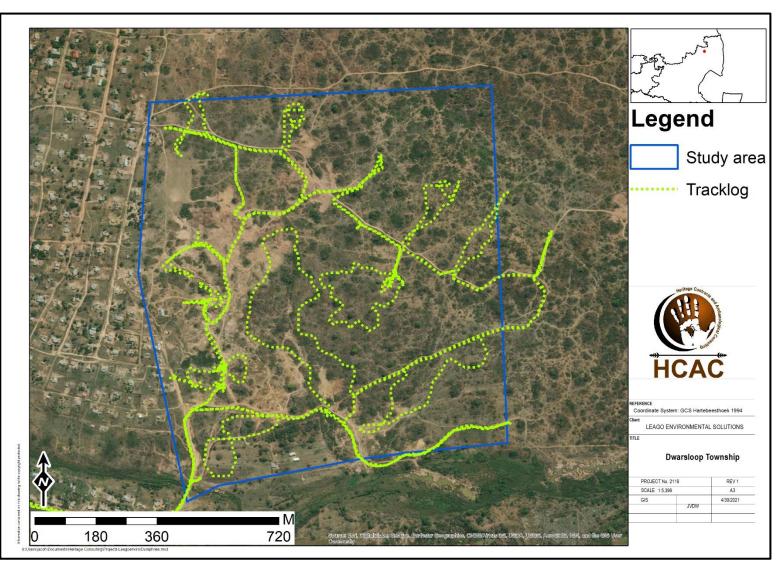


Figure 3-1: Tracklog of the survey in green.



3.5 Site Significance and Field Rating

Section 3 of the NHRA distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface. This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- 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/is known);
- The preservation condition of the sites; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.

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

Table 5. Heritage significance and field ratings



3.6

The criteria below are used to establish the impact rating on sites:

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- The **duration**, wherein it will be indicated whether:
 - the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
 - * the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
 - * medium-term (5-15 years), assigned a score of 3;
 - * long term (> 15 years), assigned a score of 4; or
 - * permanent, assigned a score of 5;
 - The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
 - The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
 - The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
 - the status, which will be described as either positive, negative or neutral.
 - the degree to which the impact can be reversed.
 - the degree to which the impact may cause irreplaceable loss of resources.
 - the *degree* to which the impact can be mitigated.

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

S=(E+D+M) P

- S = Significance weighting
- E = Extent
- D = Duration
- M = Magnitude
- P = Probability



The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the nature of heritage resources and pedestrian surveys, the possibility exists that some features or artefacts may not have been discovered/recorded and the possible occurrence of graves and other cultural material cannot be excluded. Similarly, the depth of cultural deposits and the extent of heritage sites cannot be accurately determined due its subsurface nature. This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would have been highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

4 Description of Socio-Economic Environment

According to the 2019 – 2020 IDP for the Bushbuckridge Local Municipality the population of Bushbuckridge Local municipality was 545 811 according to the Statistics South Africa 1996 Census, then the 2001 census shows that there was decrease to 500 128 in population. There was an increase in population in the 2011 census as the number rose to 541 248. In Bushbuckridge Local municipality's households' income is relatively low in the province as its ranked number 13 as per department of finance 2011 report. An income of R9601 – R19 600 has the most households surviving on it followed income from R19 601 – R38 200 with 29927. The average households' income is R36 569.



5 Results of Public Consultation and Stakeholder Engagement:

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5.1.1 Stakeholder Identification

Adjacent landowners and the public at large were informed of the proposed activity as part of the EIA process. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process.

6 Literature / Background Study:

6.1 Literature Review (SAHRIS)

Several previous CRM surveys are on record for the larger study area. Including the following:

- An archaeological impact study done in March 2012 by JP Celliers (Celliers, 2012) near Acornhoek (indicated no sites of archaeological or heritage significance). Site monitoring during earthworks at Elephant Point near the Kruger Gate of the Kruger National Park conducted by Celliers in September 2012 also revealed no archaeologically significant feature or material.
- Van Wyk Rowe (2008) conducted a heritage assessment for the proposed Shatale Branch Pipeline Injaka Water Treatment Works (Maviljan) - Shatale Branch (Dwarsloop) Mpumalanga Province and no resources were recorded.
- Van Schalkwyk, (2006) recorded a similar investigation in respect of the upgrading work to be done to the Acornhoek dam. No heritage resources were identified within the proposed upgrade area.
- Dr U S Küsel conducted an archaeological impact survey near Hoedspruit on various portions of the farm Guernsey 81 KU in October of 2005. No sites or features of heritage significance were located during this survey (Küsel, 2005).
- Frans Roodt conducted two assessments in the area. The 2002 study for the bulk water supply at Dwarsloop recorded possible graves, historical features and Iron Age sites. (Roodt, 2005) conducted an archaeological impact assessment in October 2005 in respect of a road development near Acornhoek. The focus area was on the farms Craigieburn 462 KT and Authursseat 214 KU. Two Early Iron Age sites were recorded where pottery fragments and the remains of a hut floor were visible. Two historic graves were also recorded.
- Lastly van der Walt conducted an archaeological impact assessment in respect of a proposed service station in Acornhoek (van der Walt 2003). No sites or features of archaeological or heritage significance were documented.
- Van Schalkwyk, (2001) also recorded no sites or features of archaeological significance during his visit to the farms Greenvalley 213 KU and Islington 219 KU.

6.1.1 Genealogical Society and Google Earth Monuments

No known grave sites are indicated in the study area.



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6.2 Background to the general area

6.2.1 Archaeology of the area

The archaeology of the area can be divided in three main periods namely the Stone Age, Iron Age and Historical period.

6.2.2 Stone Age

South Africa has a long and complex Stone Age sequence of more than 2 million years. The broad sequence includes the Later Stone Age, the Middle Stone Age and the Earlier Stone Age. Each of these phases contains sub-phases or industrial complexes, and within these we can expect regional variation regarding characteristics and time ranges. For Cultural Resources Management (CRM) purposes it is often only expected/ possible to identify the presence of the three main phases.

Yet sometimes the recognition of cultural groups, affinities or trends in technology and/or subsistence practices, as represented by the sub-phases or industrial complexes, is achievable (Lombard 2011). The three main phases can be divided as follows;

- » Later Stone Age; associated with Khoi and San societies and their immediate predecessors. - Recently to ~30 thousand years ago.
- » Middle Stone Age; associated with Homo sapiens and archaic modern human . 30-300 thousand years ago.
- » Earlier Stone Age; associated with early Homo groups such as Homo habilis and Homo erectus. 400 000-> 2 million years ago.

Very few Early Stone Age (ESA) sites are on record for Mpumalanga. An example where ESA tools have been discovered located outside of the study area is at Maleoskop (Bergh 1999) on the farm Rietkloof, which is one of only a handful of such sites in Mpumalanga. Another example also outside of the study area is at Bushman Rock Shelter (Mason 1969, Wadley 1987), a well-known site in the Ohrigstad district. This cave was excavated twice in the 1960s by Louw and later by Eloff. The MSA layers show that the cave was repeatedly frequented over a long period. Lower layers have been dated to over 40 000 Before Present (BP), while the top layers date to approximately 27 000 BP (Esterhuysen and Smith in Delius, 2007). MSA material is found widely across South Africa and some MSA manifestations can be expected in the study area.

Sites dating to the LSA are found in numerous rock shelters throughout Eastern Mpumalanga, where some of their rock art is still visible. A number of these shelters have been documented throughout the Province (Schoonraad in Barnard, 1975; Bornman, 1995 and Delius, 2007). These include areas such as Witbank, Ermelo, Barberton, Nelspruit, White River, Lydenburg and Ohrigstad. At Honingklip near Badplaas in the Carolina District, two LSA rock shelters with four panels of rock art was excavated. The site was used between 4870 BP and as recently as 200 BP. Stone walls at both sites date to the last 250 years of hunter-gatherer occupation and they may have served as protection against intruders and predators. Pieces of clay ceramic and iron beads found at the site indicates that there was early social interaction between the hunter-gatherer (San) communities and the first farmers who moved into this area at around 500 AD.



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HIA – Dwarsloop Township Development 6.2.3 Iron Age and historical period

Bantu-speaking people moved into Eastern and Southern Africa about 2,000 years ago (Mitchell, 2002). These people cultivated sorghum and millets, herded cattle and small stock and manufactured iron tools and copper ornaments. Because metalworking represents a new technology, archaeologists call this period the Iron Age. Characteristic ceramic styles help archaeologists to separate the sites into different groups and time periods. The Iron Age as a whole represents the spread of Bantu speaking people and includes both the Pre-Historic and Historic periods. It can be divided into three distinct periods:

- » The Early Iron Age: Most of the first millennium AD.
- » The Middle Iron Age: 10th to 13th centuries AD.
- » The Late Iron Age: 14th century to colonial period.

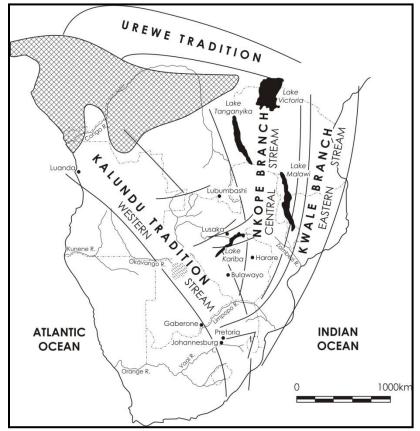


Figure 6-1: Movement of Bantu speaking farmers (Huffman 2007).



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The later phases of the Iron Age (AD 1600-1800's) are represented by various tribes including Ndebele, Swazi, BaKoni, and Pedi, marked by extensive stonewalled settlements found throughout the escarpment and particularly around Machadodorp, Lydenburg, Badfontein, Sekhukuneland, Roossenekal and Steelpoort. The BaKoni were the architects of a unique archaeological stone building complex who by the 19th century spoke seKoni which was similar to Sepedi. The core elements of this tradition are stone-walled enclosures, roads, and terraces. These settlement complexes may be divided into three basic features: homesteads, terraces, and cattle tracks.

Researchers such as Mike Evers (1975) and David Collett (1982) identified three basic settlement layouts in this area. These sites can be divided into simple and complex ruins. Simple ruins are normally small in relation to more complex sites and have smaller central cattle byres and fewer huts. Complex ruins consist of a central cattle byre, which has two opposing entrances and several semi-circular enclosures surrounding it. The perimeter wall of these sites is sometimes poorly visible. Huts are built between the central enclosure and the perimeter wall. These are all connected by trackways referred to as cattle tracks. These tracks are made by building stone walls, which forms a walkway for cattle to the centrally located cattle byres. A combination of these features occurs on a few dispersed sites to the north west of the study area.

Individual sites range from simple enclosures, which consist of single or two concentric stonewalled circles found in small, isolated settlements, to complex sites with large central enclosures which have smaller enclosures attached to their outer walls. The walls are built with undressed, locally occurring, stone. Walls on average are 0.5 to approximately 1 meter high, although often only the foundation stones are left. The Early Iron Age site Plaston is located close to Witrivier.

6.2.4 Anglo-Boer War

The Anglo-Boer War, which took place between 1899 and 1902 in South Africa, was one of the most turbulent times in South Africa's history. Even before the outbreak of war in October 1899 British politicians, including Sir Alfred Milner and Mr Chamberlain, had declared that should Britain's differences with the Z.A.R. result in violence, it would mean the end of republican independence. This decision was not immediately publicized, and republican leaders based their assessment of British intentions on the more moderate public utterances of British leaders. Consequently, in March 1900, they asked Lord Salisbury to agree to peace on the basis of the status quo ante bellum. Salisbury's reply was, however, a clear statement of British war aims (Du Preez 1977).

General Louis Botha, with his Boer forces, marched through Nelspruit on 11 September 1900. A week later, on 18 September 1900, the British battalion of Lieutenant General F. Roberts arrived in Nelspruit. No major skirmishes in the war took place near Nelspruit, but a black concentration camp was established a small distance to the north of the town. The reason for this is possibly that there was a railway station at Nelspruit. Another event of import in the area was the arrival of the President of the Transvaal, Paul Kruger, in Nelspruit on 29 May 1900, where he received a message saying Lord Roberts had annexed the Transvaal. Kruger declared the annexation illegitimate on 3 September 1900, the same day that Nelspruit was proclaimed the administrative capital of the Transvaal Republic. Kruger left Nelspruit in June of that year and travelled to board a ship to Swaziland (Bergh, 1999: 51; 54).



6.2.1 Cultural Landscape

Historical maps dating from the 1960's is available for the study area. The study area is part of the rural landscape with sparse informal settlement during this time (Figure 6-2). The project area and surrounds are still rural, but settlement density has increased (Figure 6-3).

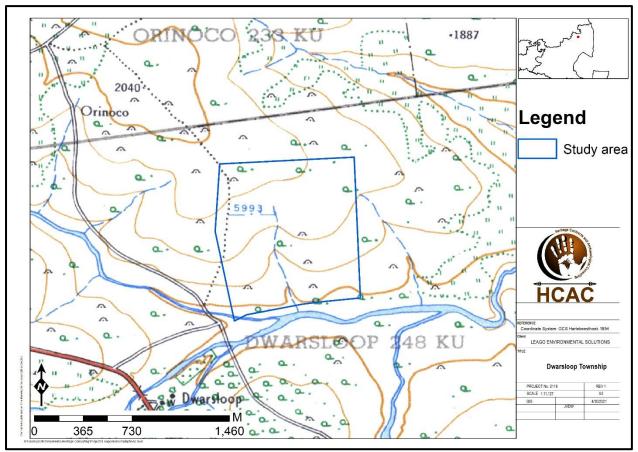


Figure 6-2. 1964 Topographic map of the study area. Isolated huts are indicated.







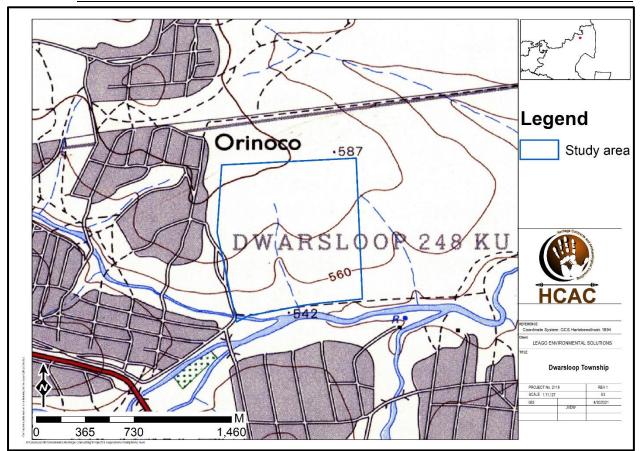


Figure 6-3. 1986 Topographic map of the study area, no developments are indicated.

6.3 Graves and Burial Sites

Graves and cemeteries are widely distributed across the landscape and can be expected anywhere.

7 Description of the Physical Environment

The vegetation is classed as Legogote Sour Bushveld comprising gently to moderately sloping upper pediment with dense woodland including many medium to large shrubs. Short thicket occurs on less rocky sites. Low vegetation cover on exposed granite outcrops. Parts of the study area retains the original vegetation, and the area is largely dominated by overgrown thickets of small trees and shrubs growing in very sandy soil. Some areas within these thickets are so overgrown that visibility was very low (Figure 7-1).

High levels of erosion (Figure 7-2) are evident within the study area, due to a combination of water run-off and sand mining in the area. These operations have created a network of roads running through the study area (Figure 7-3). Large TLBs and loading trucks are being sent into the area to load the sand which is then hauled out. It is evident from aerial photographs that about 40% of the study area has been mined for its sand. A large series of dongas have formed all along the edges of the extensive diggings.



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Figure 7-1. Thick vegetation cover in study area.



Figure 7-2. The study area is characterised by areas with extensive erosion.



Figure 7-3. Network of roads in the study area.



Figure 7-4. Sandmining in the area.



8 Findings of the Survey

Parts of the study area is characterised by high vegetation cover after the recent rains, limiting archaeological visibility. Extensive sand mining resulted in areas of high erosion and in these areas low density scatters of mainly Middle Stone Age (MSA) and possibly isolated occurrences of Later Stone Age (LSA) artefacts were recorded at multiple locations (DL 001 – DL003). These artefacts (Figure 8-2 to 8-5) show signs of weathering possibly due to secondary positioning by water. This low-density occurrence of artefacts is referred to as background scatter (Orton 2016) and generally of low significance.

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DL004 and DL005 marks the location of a large cemetery that was identified within the study area. The cemetery contains more than 120 graves of varying designs, mostly dating to between 2003 and present. Some graves such as the one at DL005, are hidden among the overgrowth around the cemetery which would indicate that the cemetery is larger than what is perceived by casual observation (Figure 8-6 to 8-8).

The spatial distribution of the recorded finds is illustrated in Figure 8-1 and the coordinates and short description of the finds is included in Table 6.

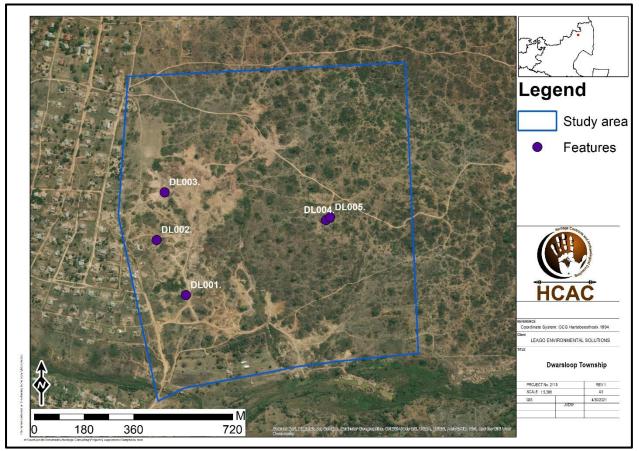


Figure 8-1. Site distribution map.



Label	Site description	Longitude &	Significance
DL001	Low density scatters of mostly MSA	24° 46' 43.4208" S,	GPC
	artefacts. Raw material consists of	31° 05' 10.5037" E	Low
	quartzite and chert. No formal tools		
	present only flakes.		
DL002	Low density scatters of mostly MSA	24° 46' 36.9408" S,	GPC
	artefacts. Raw material consists of	31° 05' 07.0729" E	Low
	quartzite and CCS. No formal tools		
	present only flakes.		
DL003	Low density scatters of mostly MSA	24° 46' 31.3644" S,	GPC
	artefacts. Raw material consists of	31° 05' 08.0089" E	Low
	quartzite. One blade recorded.		
DL004 –	Large cemetery	24° 46' 34.2911" S,	GP A
DL005		31° 05' 27.4668" E	High
		24° 46' 34.6188" S,	
		31° 05' 26.9735" E	

Table 6. Recorded heritage features.



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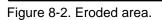


Figure 8-3. Dorsal and ventral view of artefacts from DL001



Figure 8-4. Artefacts from DL002









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Figure 8-6. Large cemetery at DL004



Figure 8-7. Parts of the cemetery is covered by dense vegetation.



Figure 8-8. DL004 Large cemetery



Based on the SAHRA Paleontological map the area (Fig 8-10) is of insignificant paleontological sensitivity and no further studies are required for this aspect.



Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN MODERATE Desktop str		Desktop study is required
BLUE		No paleontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR		These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

Figure 8-9. Paleontological Sensitivity of the approximate study area (yellow polygon) is indicated as insignificant.



9 Potential Impact

Due to the low significance of the MSA scatter impacts on these features are low and no mitigation is required for this aspect. The recorded cemetery is of high social significance and impacts on graves can include destruction and disturbance during construction. Without mitigation this would be a high impact. With the implementation of mitigation measures, impacts can be mitigated to an acceptable level. The potential impact of the project on recorded sites is illustrated in Figure 9-1 and 9-2 as well as in Table 7 and 8 and discussed below.

9.1.1 Pre-Construction phase

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure needed for the construction phase. These activities can have a negative and irreversible impact on heritage features if any occur. Impacts include destruction or partial destruction of non-renewable heritage resources.

9.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. Potential impacts include destruction or partial destruction of non-renewable heritage resources.

9.1.3 Operation Phase

No impact is expected during this phase.

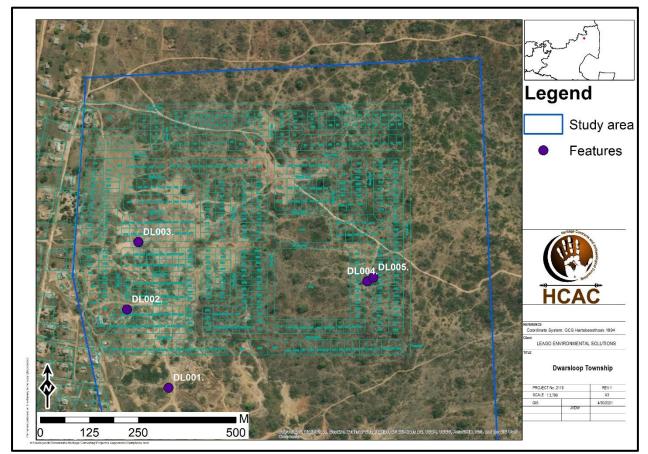


Figure 9-1. Development layout in relation the heritage features.





Figure 9-2. Zoomed in image of the recorded cemetery in relation to the proposed layout.



Table 7. Impact assessment of the proposed project on archaeological background scatter.

Nature: During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological material or objects.

	Without mitigation	With mitigation		
		(Preservation/ excavation		
		of site)		
Extent	Local (2)	Local (1)		
Duration	Permanent (5)	Permanent (5)		
Magnitude	Low (2)	Low (2)		
Probability	Probable (3)	Improbable (2)		
Significance	27 (Low)	16 (Low)		
Status (positive or	Negative	Negative		
negative)				
Reversibility	Not reversible	Not reversible		
Irreplaceable loss of	Yes	Yes		
resources?				
Can impacts be mitigated?	Yes			
Mitigation:				
The recorded features are out of context and of low significance and is sufficiently recorded in				
this report. No additional mitigation required.				

Cumulative impacts:

Cumulative impacts are of no concern for this aspect.

Residual Impacts:

Although surface sites can be avoided or mitigated, there is a chance that completely buried sites would still be impacted on, but this cannot be quantified.



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Table 8. Impact of the project on burial sites.

Nature: During the construction phase activities resulting in disturbance of surfaces and/or subsurfaces may destroy, damage, alter, or remove from its original position archaeological material or objects.

	Without mitigation	With mitigation (Preservation/ excavation of site)
Extent	Regional (4)	Regional (3)
Duration	Permanent (5)	Permanent (5)
Magnitude	Moderate (6)	Moderate (4)
Probability	Definite (5)	Improbable (2)
Significance	75 (High)	24 (Low)
Status (positive or negative)	Negative	Negative
Reversibility	Not reversible	Not reversible
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	

Mitigation:

- Adjust layout to preserve the sites *in-situ* with a 30 m buffer zone;
- Development of a site management plan to ensure protection of the graves;
- Ensure access to the sites for family members.

Cumulative impacts:

Impacts to heritage resources can be mitigated to an acceptable level. With the implementation of the mitigation measures as proposed in this report the cumulative impact is low.

Residual Impacts:

Although surface sites can be avoided or mitigated, there is a chance that completely buried sites would still be impacted on, but this cannot be quantified.



10 Conclusion and recommendations

Accessibility in certain portions of the study area is limited due to impregnable vegetation cover. High vegetation cover after the recent rains also limits archaeological visibility. These limitations can be mitigated with the implementation of a chance find procedure. The study area is characterised by extensive sand mining that resulted in areas of high erosion, where low density scatters of mainly Middle Stone Age (MSA) and possibly isolated occurrences of Later Stone Age (LSA) artefacts were recorded. These artefacts show signs of weathering, possibly due to secondary positioning by water. This low-density occurrence of artefacts is referred to as background scatter (Orton 2016) and generally of low significance.

The only resource of significance is a large cemetery containing more than 120 graves of varying designs, mostly dating to between 2003 and present. Some graves are hidden among the overgrowth around the cemetery which would indicate that the cemetery is larger than what is perceived by casual observation.

The impact of the project on heritage resources can be mitigated to an acceptable level and the project can commence based on the adherence to the recommendations in this report and the approval of SAHRA.

10.1. Recommendations for condition of authorisation

The following recommendations for Environmental Authorisation apply and the project may only proceed based on approval from SAHRA:

- It is recommended that all identified graves and cemeteries should be retained *in situ* with a 30 m around the identified features.
- The possibility of more graves in the study area cannot be excluded and it recommended that this should be confirmed by social consultation prior to construction as well as a walk down of the area prior to vegetation clearing by the EO;
- Implementation of a chance find procedure for the project as outlined below.

10.2. Chance Find Procedures

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find and therefor chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any
 person employed by the developer, one of its subsidiaries, contractors and subcontractors, or
 service provider, finds any artefact of cultural significance or heritage site, this person must cease
 work at the site of the find and report this find to their immediate supervisor, and through their
 supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.



• The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

10.3. Reasoned Opinion

The overall impact of the project is considered acceptable based on the adherence to the recommendations in this report and approval from SAHRA prior to development. The socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures are implemented for the project.

10.4 Potential risk

Potential risks to the proposed project are the occurrence of intangible features and unrecorded cultural resources (of which graves are the highest risk). This can cause delays during construction, additional costs involved in mitigation, and might require additional layout changes.



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10.5 Monitoring Requirements

Day to day monitoring can be conducted by the Environmental Officers (EO). The EO or other responsible persons should be trained along the following lines:

- Induction training: Responsible staff identified by the developer should attend a short course on heritage management and identification of heritage resources.
- Site monitoring and watching brief: As most heritage resources occur below surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are the initial soil removal and subsequent earthworks during construction. The EO should monitor all such activities daily. If any heritage resources are found, the chance finds procedure must be followed as outlined above.

Table 9. Monitoring requirements for the project

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
Clearing activities and Excavations	Entire project area	EO	Weekly – during construction phase	Proactively	 If risks are manifested (accidental discovery of heritage resources) the chance find procedure should be implemented: Cease all works immediately; Report incident to the Sustainability Manager; Contact an archaeologist to inspect the site; Report incident to the competent authority; and Employ reasonable mitigation measures in accordance with the requirements of the relevant authorities. Only recommence operations once impacts have been mitigated.



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10.6 Management Measures for inclusion in the EMPr

Table 10. Heritage Management Plan for EMPr implementation

Area	Mitigation measures	Phase	Timeframe	Responsible party for	Target	Performance
				implementation		indicators
						(monitoring tool)
General	Implement chance find procedures	Ground	Throughout the	Applicant	Ensure compliance with	EO Checklist/Report
project area	in case possible heritage finds are	clearance,	project	EAP	relevant legislation and	
	uncovered	excavations as			recommendations from	
		well as			SAHRA under Section	
		construction			35, 36 and 38 of NHRA	
		and operation				
Burial Sites	All graves should be indicated on	All	Throughout the	Applicant and ECO	Retain graves in situ	ECO Checklist/
	development plans and avoided		project			Report



10.7 Knowledge Gaps

Due to the subsurface nature of heritage resources and limited archaeological visibility due to high vegetation cover, the possibility of discovery of heritage resources during the construction phase cannot be excluded. This limitation is successfully mitigated with the implementation of a chance find procedure.



11. References

Amery, L.S. (ed),1909. The times history of the war in South Africa 1899-1902, Vol VI. London,

Archaeological database, University of the Witwatersrand.

- Barnard, C. 1975. Die Transvaalse Laeveld. Komee van 'n Kontrei.
- Bergh, J.S. (ed.) 1998. Geskiedenisatlas van Suid-Afrika. Die vier noordelike provinsies. (J.L. van Schaik, Pretoria).

- Bornman, H. 1995. Pioneers of the Lowveld.
- Bornman, H. (red.) 1979. Nelspruit: 75 in '80. Stadsraad van Nelspruit.
- Breutz, P.L. 1985. Pre-Colonial Africa: The South-Eastern Bantu Cultural Province.
- Celliers, J.P. 2012. Report on Phase 1 Archaeological Impact Assessment on Portion 17 of the farm Acornhoek 212 KU located in Bushbuckridge Local Municipality, Mpumalanga Province.
- Celliers, J.P. 2012. Second Progress Report on the Archaeological Monitoring of construction activity at Elephant Point located on Portion 10 of the farm Belfast 291 KU, Mpumalanga Province.
- Delius, P. 2007. Mpumalanga History and Heritage. University of KwaZulu-Natal Press.
- Du Preez, S. J. Peace attempts during the Anglo Boer War until March 1901. Magister Artium thesis in History. Pretoria: University of Pretoria.
- Evers, T.M. in Voight, E.A. 1981. Guide to Archaeological Sites in the Northern and Eastern Transvaal. Transvaal Museum, Pretoria.
- Giliomee, H. 2003. The Afrikaners biography of a people. Tafelberg, Cape Town & Charlottsville.
- Hall, H.L. 1938 (1990). I Have Reaped my Mealies. An Autobiography. Whitnall Simonsen.
- Huyser, J. D. Die Naturelle-Politiek van die Suid-Afrikaanse Republiek. D. LITT. Verhandeling, Universiteit van Pretoria.
- Huffman, T. N. 2007. Handbook to the Iron Age: The Archaeology of Pre-Colonial Farming Societies in Southern Africa. Kwa-Zulu Natal Press.
- Jones, H. M. & Jones G. M. 1999. A Gazetteer of the Second Anglo-Boer War. 1899-1902. Buckinghamshire: The Military Press.
- Küsel, U. 2005. Cultural Heritage Resources Impact Assessment of a Portion of Kapama Hoedspruit (Guernsey 81 KU Portions 6, 34, 98, 109, 56, 204 and 210). An unpublished report by African Heritage Consultants CC on file at SAHRA as: 2005-SAHRA-0264.
- Mason, R. 1962. Prehistory of the Transvaal: a record of human activity. Witwatersrand University Press, Johannesburg.
- Massie, R.H. 1905. The Native tribes of Transvaal. Prepared for the general staff war office. Harrison and Sons, London.
- Mucina, L. & Rutherford, M.C. 2006. The vegetation map of South Africa, Lesotho and Swaziland. SANBI, Pretoria.
- Myburgh, A.C. 1956. Die Stamme van die Distrik Carolina. Staatsdrukker. Pretoria.
- National Heritage Resources Act NHRA of 1999 (Act 25 of 1999)



- Packard, P. 2001. "Malaria blocks development" revisited: the role of disease in the history of agricultural development in the Eastern and Northern Transvaal Lowveld. 1890-1960. Journal of Southern African Studies 27 (3), September 2001.
- Ross, R. 2002. A Concise History of South Africa. Cambridge.
- Van der Walt, J. 2003. Phase 1 Archaeological Impact Assessment: Cultural Heritage Evaluation for the Proposed Service Station in Acornhoek. An unpublished report on file at SAHRA as: 2003-SAHRA-0064.
- Van Schalkwyk, J.A. 2001. Archaeological Investigation of Two Sites in the Acornhoek Area. An unpublished report by the National Cultural History Museum on file at SAHRA as: 2001-SAHRA-0056.
- Van Schalkwyk, J.A. 2001. A Survey of Cultural Resources in Two Potential Borrow Pit Areas, Acornhoek, Northern Province. An unpublished report by the National Cultural History Museum on file at SAHRA as: 2001-SAHRA-0064.
- Van Schalkwyk, L.O. 2006. Heritage Impact Assessment of Acornhoek Dam, Klaserie, Limpopo Province, South Africa. An unpublished report by eThembeni Cultural Heritage on file at SAHRA as: 2006-SAHRA-0256.
- Van Vollenhoven, A.C. 2002. Die Metodiek van Kultuurhulpbronbestuur (KHB). S.A. Tydskrif vir Kultuurgeskiedenis 16(2).
- Van Vollenhoven, A.C. 1995. Die bydrae van Argeologie tot Kultuurhulpbronbestuur. Referaat gelewer voor die Suid-Afrikaanse Vereniging vir Kultuurgeskiedenis, Transvaal Streektak, Sunnyside.
- Union of South Africa. 1918. Majority Report of the Eastern Transvaal Natives Land Committee. Cape Town.

ELECTRONIC SOURCES:

South African History Online. 2013. 1999. Nelspruit Timeline 1815-1996. [Online]. Available: http://www.sahistory.org.za/topic/nelspruit-timeline-1815-1996?page=2. [Cited 22 May 2013] Archaeological Database Wits University 2009



12. Appendices:

Appendix A Curriculum Vitae of Specialist

Jaco van der Walt Archaeologist

jaco.heritage@gmail.com +27 82 373 8491 +27 86 691 6461

Education:

Particulars of degrees/diplomas and/or other qualifications:

Name of University or Institution:		University of Pretoria		
Degree obtained	:	BA Heritage Tourism & Archaeology		
Year of graduation	:	2001		
Name of University or Institution:		University of the Witwatersrand		
Degree obtained	:	BA Hons Archaeology		
Year of graduation	:	2002		
Name of University or Institution	:	University of the Witwatersrand		
Degree Obtained	:	MA (Archaeology)		
Year of Graduation	:	2012		
Name of University or Institution	:	University of Johannesburg		
Degree	:	PhD		
Year	:	Currently Enrolled		

EMPLOYMENT HISTORY:

2011 – Present:	Owner – HCAC (Heritage Contracts and Archaeological Consulting CC).
2007 – 2010 :	CRM Archaeologist, Managed the Heritage Contracts Unit at the
	University of the Witwatersrand.
2005 - 2007:	CRM Archaeologist, Director of Matakoma Heritage Consultants
2004:	Technical Assistant, Department of Anatomy University of Pretoria
2003:	Archaeologist, Mapungubwe World Heritage Site
2001 - 2002:	CRM Archaeologists, For R & R Cultural Resource Consultants, Polokwane
2000:	Museum Assistant, Fort Klapperkop.



HIA – Dwarsloop	o Townshir	Develo	oment
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Countries of work experience include:

Republic of South Africa, Botswana, Zimbabwe, Mozambique, Tanzania, The Democratic Republic of the Congo, Lesotho and Zambia.

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SELECTED PROJECTS INCLUDE:

Archaeological Impact Assessments (Phase 1)

Heritage Impact Assessment Proposed Discharge Of Treated Mine Water Via The Wonderfontein Spruit Receiving Water Body Specialist as part of team conducting an Archaeological Assessment for the Mmamabula mining project and power supply, Botswana

Archaeological Impact Assessment Mmamethlake Landfill

Archaeological Impact Assessment Libangeni Landfill

Linear Developments

Archaeological Impact Assessment Link Northern Waterline Project At The Suikerbosrand Nature Reserve Archaeological Impact Assessment Medupi – Spitskop Power Line, Archaeological Impact Assessment Nelspruit Road Development

Renewable Energy developments

Archaeological Impact Assessment Karoshoek Solar Project

Grave Relocation Projects

Relocation of graves and site monitoring at Chloorkop as well as permit application and liaison with local authorities and social processes with local stakeholders, Gauteng Province.

Relocation of the grave of Rifle Man Maritz as well as permit application and liaison with local authorities and social processes with local stakeholders, Ndumo, Kwa Zulu Natal.

Relocation of the Magolwane graves for the office of the premier, Kwa Zulu Natal

Relocation of the OSuthu Royal Graves office of the premier, Kwa Zulu Natal

Phase 2 Mitigation Projects

Field Director for the Archaeological Mitigation For Booysendal Platinum Mine, Steelpoort, Limpopo Province. Principle investigator Prof. T. Huffman

Monitoring of heritage sites affected by the ARUP Transnet Multipurpose Pipeline under directorship of Gavin Anderson.

Field Director for the Phase 2 mapping of a late Iron Age site located on the farm Kameelbult, Zeerust, North West Province. Under directorship of Prof T. Huffman.

Field Director for the Phase 2 surface sampling of Stone Age sites effected by the Medupi – Spitskop Power Line, Limpopo Province

Heritage management projects

Platreef Mitigation project - mitigation of heritage sites and compilation of conservation management plan.



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MEMBERSHIP OF PROFESSIONAL ASSOCIATIONS:

- Association of Southern African Professional Archaeologists. Member number 159 Accreditation:
 - Field Director Iron Age Archaeology
 - Field Supervisor Colonial Period Archaeology, Stone Age Archaeology and Grave Relocation
- Accredited CRM Archaeologist with SAHRA
- Accredited CRM Archaeologist with AMAFA
- Co-opted council member for the CRM Section of the Association of Southern African Association Professional Archaeologists (2011 – 2012)

PUBLICATIONS AND PRESENTATIONS

- A Culture Historical Interpretation, Aimed at Site Visitors, of the Exposed Eastern Profile of K8 on the Southern terrace at Mapungubwe.
 - J van der Walt, A Meyer, WC Nienaber
 - Poster presented at Faculty day, Faculty of Medicine University of Pretoria 2003
- 'n Reddingsondersoek na Anglo-Boereoorlog-ammunisie, gevind by Ifafi, Noordwes-Provinsie. South-African Journal for Cultural History 16(1) June 2002, with A. van Vollenhoven as co-writer.
- Fieldwork Report: Mapungubwe Stabilization Project.
 - WC Nienaber, M Hutten, S Gaigher, J van der Walt
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2004
- A War Uncovered: Human Remains from Thabantsho Hill (South Africa), 10 May 1864.
 - M. Steyn, WS Boshoff, WC Nienaber, J van der Walt
 - Paper read at the 12th Congress of the Pan-African Archaeological Association for Prehistory and Related Studies 2005
- Field Report on the mitigation measures conducted on the farm Bokfontein, Brits, North West Province .
 - J van der Walt, P Birkholtz, W. Fourie
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2007
- Field report on the mitigation measures employed at Early Farmer sites threatened by development in the Greater Sekhukhune area, Limpopo Province. J van der Walt
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2008
- Ceramic
-]'jnanalysis of an Early Iron Age Site with vitrified dung, Limpopo Province South Africa.
 - J van der Walt. Poster presented at SAFA, Frankfurt Germany 2008

• Bantu Speaker Rock Engravings in the Schoemanskloof Valley, Lydenburg District, Mpumalanga (*In Prep*)

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- J van der Walt and J.P Celliers
- Sterkspruit: Micro-layout of late Iron Age stone walling, Lydenburg, Mpumalanga. W. Fourie and J van der Walt. A Poster presented at the Southern African Association of Archaeologists Biennial Conference 2011
- Detailed mapping of LIA stone-walled settlements' in Lydenburg, Mpumalanga. J van der Walt and J.P Celliers
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2011
- Bantu-Speaker Rock engravings in the Schoemanskloof Valley, Lydenburg District, Mpumalanga. J.P Celliers and J van der Walt
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2011
- Pleistocene hominin land use on the western trans-Vaal Highveld ecoregion, South Africa, Jaco van der Walt.
 - J van der Walt. Poster presented at SAFA, Toulouse, France. Biennial Conference 2016

REFERENCES:

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1.	Prof Marlize Lombard	Senior Lecturer, University of Johannesburg, South Africa
		E-mail: mlombard@uj.ac.za
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		University of the Witwatersrand
3.	Alex Schoeman	University of the Witwatersrand
		E-mail:Alex.Schoeman@wits.ac.za

