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**PHASE 1 HIA REPORT FOR THE PROPOSED
TOWNSHIP DEVELOPMENT (CITY DEEP EXT. 29)
ON THE REMAINING EXTENT OF KLIPRIVIERSBERG 106IR
CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY, GAUTENG**

For:

***iProp Proprietary Limited
P.O.Box 27
CROWN MINES
2025***

REPORT: APAC014/10

by:

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SUMMARY

A Pelser Archaeological Consulting (APAC) was appointed by iProp Proprietary Limited to conduct a Phase 1 HIA a proposed new Township development. The development and study area is located on the Remaining Extent of Portion 1 of the farm Klipriviersberg 106JR, in the City of Johannesburg Metropolitan Municipality. The area is also known as City Deep and the development will be known as City Deep Extension 29.

This report is the result of the 2014 HIA. The location of the development is close to the old City Deep No.4 Shaft mine and has been completely developed and changed from an industrial and commercial point of view. A number of buildings and other structures related to the mining activities of the past exist here and are currently occupied by a number of businesses. No archaeological sites, features or objects were identified, but from a historical perspective a number of resources do exist. Should the development negatively impact, mitigation measures will have to be implemented. This document will discuss the background to the area and provide a number of recommendations at the end of it.

Based on the assessment, from a Heritage perspective, the development should be allowed to continue, taking cognizance of the conclusions and recommendations put forward at the end of this report.

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1. INTRODUCTION

A Pelser Archaeological Consulting (APAC) was appointed by iProp Proprietary Limited to conduct a Phase 1 HIA a proposed new Township development. The development and study area is located on the Remaining Extent of Portion 1 of the farm Klipriviersberg 106JR, in the City of Johannesburg Metropolitan Municipality. The area is also known as City Deep and the development will be known as City Deep Extension 29.

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Based on the assessment, from a Heritage perspective, the development should be allowed to continue, taking cognizance of the conclusions and recommendations put forward at the end of this report.

The client indicated the location and boundaries of the study area and the fieldwork focused on this portion of land.

2. TERMS OF REFERENCE

The Terms of Reference for the study is to:

1. Identify all objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located on the portion of land that will be impacted upon by the proposed development;
2. Assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value;
3. Describe the possible impact of the proposed development on these cultural remains, according to a standard set of conventions;
4. Propose suitable mitigation measures to minimize possible negative impacts on the cultural resources;
5. Review applicable legislative requirements;

3. 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).

3.1 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 of scientific or technological value.

The National Estate 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. Sites of Archaeological and palaeontological importance
- g. Graves and burial grounds
- h. Sites of significance relating to the history of slavery
- i. Movable objects (e.g. archaeological, palaeontological, 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 (AIA) only looks at archaeological resources. 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 palaeontological site or any meteorite;
- b. destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological 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 palaeontological material or object, or any meteorite; or
- d. bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment that assists in the detection or recovery of metals or archaeological and palaeontological 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
- c. 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.

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 to) 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)**.

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

3.2 The National Environmental Management Act

This act 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.

4. METHODOLOGY

4.1 Survey of literature

A survey of available literature, including previous heritage assessments, was undertaken in order to place the development area in an archaeological and historical context. The sources utilized in this regard are indicated in the bibliography.

4.2 Field survey

The field assessment section of the study was conducted according to generally accepted HIA practices and aimed at locating all possible objects, sites and features of archaeological significance in the area of the proposed development. The location/position of all sites,

features and objects is determined by means of a Global Positioning System (GPS) where possible, while detail photographs are also taken where needed.

4.3 Oral histories

People from local communities are sometimes 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.

4.4 Documentation

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

5. DESCRIPTION OF THE AREA

The City Deep Extension 29 township development (N17 Park) is situated on the remaining extent of Portion 1 of the farm Klipriviersberg 106IR. It is located in City Deep, within the City of Johannesburg Metropolitan Municipality, Gauteng. The area comprises around 13.900 ha in total. The area has been extensively disturbed through industrial (mining, warehousing) and other business developments over the recent past, and very little of its original natural landscape still exists. Large sections are taken up by storage container facilities and most of the structures on the property are currently used by and rented by tenants running a range of commercial businesses. A number of the buildings are associated with earlier gold mining (No. 4 Shaft) and retains some heritage significance, but has mostly been changed to a large degree diminishing their significance.

The most significant historical feature on the premises is the old No.4 Shaft Headgear and Main Entrance and office buildings and warehousing. As a result of recent historical developments very little (if these indeed existed) of the pre-colonial/archaeological landscape would have been left intact. No evidence for this was found during the survey.

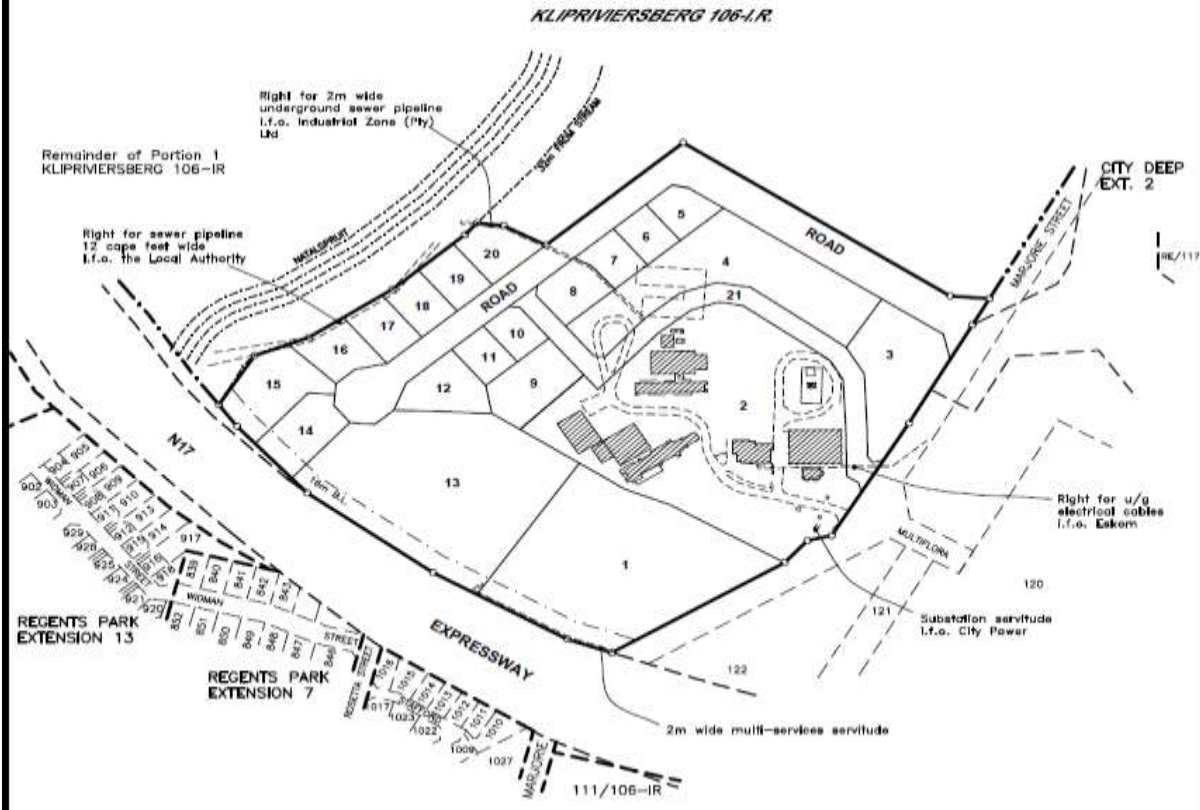


Figure 1: General location of study area (in red). Google Earth 2014 – Image date 2013/08/05.

City Deep Extension 29 (N17 Park) (Unproclaimed)



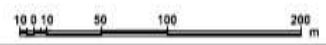
Sep 2013



Approximate Erf Sizes

ERF AREA (m ²)	ERF AREA (m ²)
1 19 065	12 2 438
2 32 394	13 19 665
3 5 835	14 2 629
4 11 151	15 3 683
5 1 434	16 1 957
6 1 280	17 1 675
7 1 338	18 1 569
8 1 865	19 1 567
9 2 966	20 1 931
10 1 222	21 6 893
11 1 240	

Erven: Sold



Tel. No. 011 496 1777 Fax. No. 011 496 1222

Figure 2: Location and development plan (courtesy iProp).



Figure 3: View of a section of the study area. Note the storage containers.



Figure 4: Another view – part of a truck stop/workshop area.



Figure 5: More storage containers with large mine dump visible.



Figure 6: Commercial businesses are located in some of the buildings.



Figure 7: Another business located in one of the warehouses.



Figure 8: A view of one of the warehouses/businesses with the old No.4 Shaft headgear visible.

6. DISCUSSION

The Stone Age is the period in human history when lithic (stone) material was mainly used to produce tools. In South Africa the Stone Age can be divided in basically into three periods. It is however important to note that dates are relative and only provide a broad framework for interpretation. A basic sequence for the South African Stone Age (Lombard et.al 2012) is as follows:

Earlier Stone Age (ESA) up to 2 million – more than 200 000 years ago
Middle Stone Age (MSA) less than 300 000 – 20 000 years ago

Later Stone Age (LSA) 40 000 years ago – 2000 years ago

It should also be noted that these dates are not a neat fit because of variability and overlapping ages between sites (Lombard et.al 2012: 125).

No Stone Age sites are known to occur in the study area, and no stone tools were identified during the survey. The closest known sites are at Aasvoelkop, Melvillekoppies, Linksfield and Primrose. These sites date from the ESA to LSA (Bergh 1999: 4).

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

Early Iron Age (EIA) 200 – 1000 A.D.

Late Iron Age (LIA) 1000 – 1850 A.D.

Huffman (2007: xiii) indicates that a Middle Iron Age should be included. His dates, which are 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.

Once again there are no known Iron Age sites in the direct study area, with the closest LIA sites located at Melvillekoppies and Bruma (Bergh 1999: 7). According to Huffman's research the Uitkomst facies of the Urewe (pottery) tradition, dating to between AD1650 and AD1820 were found at Klipriviersberg as well (Huffman 2007: 171).

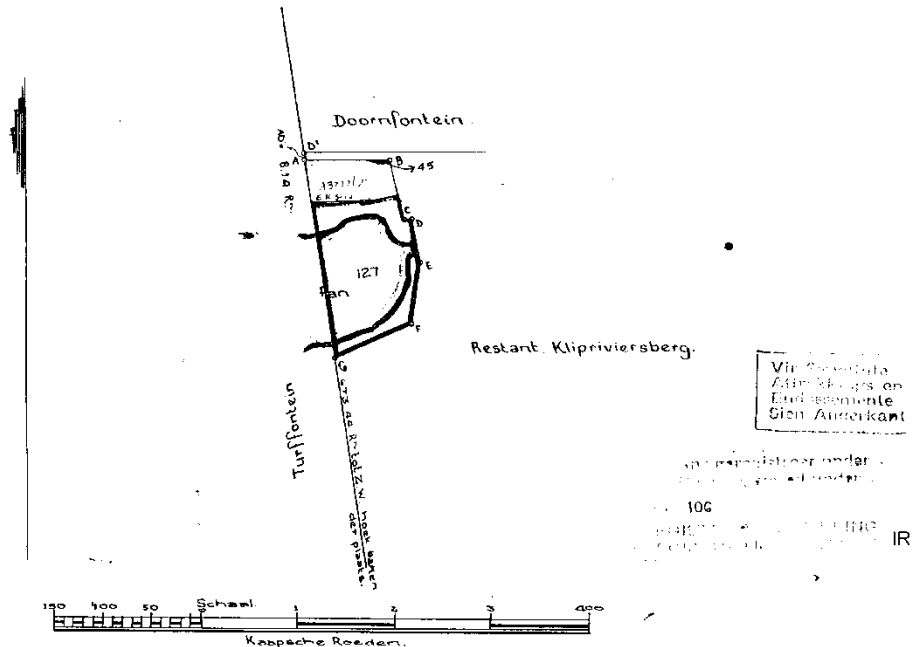
The historical age started with the first recorded oral histories in the area. It includes the moving into the area of people that were able to read and write. The earliest Europeans to travel through the area were the groups of Cornwallis Harris in 1836 and later that of David Livingstone in 1847 (Bergh 1999:13). They were closely followed by the Voortrekkers (p.14). Johannesburg was established in 1886 with the discovery of gold on the Witwatersrand (Bergh 1999:21). During the Anglo-Boer War (1899-1902) there were a number of skirmishes in and around Johannesburg (Bergh 1999: 51), while there were a number of both white & black concentration camps in the area, including on at Klipriviersberg (Bergh 1999: 54).

A map dating to 1895 (from the Chief Surveyor General database) shows that the whole farm (then numbered No.25) was originally granted to one Jacob Smit on 25 July 1859. This 1895 map is for Portion 3 (a portion of Portion 1) and was surveyed in January 1895 and transport was given in favor of the Jubilee Gold Company Limited and the Salisbury Gold Mining Company Limited on 21 January 1895 (CSG Document 10HZUU01).

According to Praagh a number of deep level mines, including City Deep, South City, Suburban Deep, Wolhuter Deep, South Wolhuter and Klip Deep, were floated prior to the Anglo-Boer War (1899-1902) as offshoots of the Klipriviersberg Estate (Gold Mining Company Limited)[Praagh 1906: 574]. City Deep Limited also possessed a mining lease on Klipriviersberg 25 (the old number of Klipriviersberg 106IR) in 1925 (SAB, Vol.808,

Reference MM2640/25). An old map/postcard dating to 1935 also shows the location of the City Deep Limited mine and dump in the approximate study area (www.on-the-rand.co.uk). From this it is clear that mining activities have been present in the area from very early on. The mining infrastructure such as the buildings and Shaft Headgear forms part of this and would be older than 60 years of age and therefore protected by the National Heritage Resources Act (Act 25 of 1999). The significance of these resources and proposed mitigation measures will be discussed in the next section.

Zijden	Hoeken	Coördinaten
AB 87.90	A 82.28.30	A - 151.27 - 58.39
BC 66.64	B 101.32.30	B - 150.76 - 146.28
CD 8.18	C 256.53.30	C - 216.87 - 160.03
DE 47.50	D 102.45.40	D - 216.15 - 168.19
EF 67.69	E 160.13.40	E - 262.70 - 177.68
FG 87.70	F 122.35.30	F - 329.69 - 167.92
GA 216.57	G 73.32.20	G - 365.83 - 98.60



De bovenstaande Figuur ABCDEFG stelt voor Gedeelte 3 (in gedeelte van Gedeelte 1) van de plaats Klipriviersberg No. 25 gelegen in het distrikt Johannesburg wijk Kliprivier, Zuid Afrikaansche Republiek, en bevat 30 Morgen 508 vierkante Roedern. De geheele plaats werd oorspronkelijk in eigendom uitgegeven aan Jacob Smit, de oude, volgens Govt. transport dd. 25 Juli 1859. De bakens zijn aangewezen door S. Harsant, en P. Payne, en zijn behoorlijk opgericht volgens wet. Gemeten den 10den Jan. 1895, door mij,

(Get.) W.K. Tucker
Landmeter.

No. 33/95 Goedgekeurd. De zijden, hoeken en Grootte van deze kaart zijn onderling bestaanbaar.

(Get.) Johann Rissik
Ossd Landmeter - Generaal.
Landmeter - Generaals kantoor,
14 Jan. 1895.

Ik, wel, Registrateur van Akten certificeer dat deze kaart behoort tot Transp. No. 135/1895, op heden uitgerecht ten faveure van The Jubilee Gold Company Limited. The Salisbury Gold Mining Company Limited.
Registratie - Kantoor, 21 Januari 1895.
(Get.) A.C.N. Lorentz.
Wd. Reg. van Akten.

Figure 9: Old 1895 map of Klipriviersberg (www.csg.dla.gov.za).



Figure 10: 1935 map/postcard showing the location of City Deep Limited (www.on-the-rand.co.uk).

Results of the Fieldwork

As mentioned earlier the area has been extensively developed (mining, industrial, other) during the recent past (more than 100 years) and as a result any Stone Age and Iron Age

remains that could have existed here in the past would have been disturbed or completely destroyed. During the assessment no archaeological sites, features or objects were identified.

A number of buildings and structures associated with late 19th/20th century gold mining in City Deep exists on the property. This includes the old No.4 Shaft Headgear and warehousing and offices. Most of these are currently used by a variety of businesses that include the Crafters Shop, Bitline Arts & Florists and Flora Park. Many of these buildings have also been altered and changed over recent years and as a result has probably lost their heritage significance. **It is recommended that should the proposed development impact on any of these buildings then a Phase 2 Assessment should be conducted. However, the client has indicated that there is no intention to damage or demolish any of the historical structures on the property.**

No.4 Shaft Headgear

Cultural Significance: **Medium to High**

Heritage Significance: **Grade III - Other heritage resources of local importance and therefore worthy of conservation.**

Field Rating: **Local Grade IIIB: should be included in the heritage register and may be mitigated (high/ medium significance).**

Mitigation Proposed: **Proper recording including detailed photographic and background history. Preserve if possible as part of area history.**

GPS Location: **S26 14.01.00 E28 04 11.7.**

Mining related structures

There are a number of these located over the property. If the proposed development would impact on them each individual building/structure would have to be assessed in terms of their heritage significance as part of a Phase 2 HIA. Many of these have been altered and changed to over the recent years and as a result their historical identity/character might have been severely compromised. A Mining Industrial/Architectural Historian needs to undertake this assessment.

Cultural Significance: **Cannot be determined at this stage.**

Heritage Significance: **Cannot be determined at this stage.**

Field Rating: **Cannot be determined at this stage.**

Mitigation Proposed: **If impacted then a Phase 2 assessment by Mining Industrial/Architectural Heritage Specialist.**

GPS Location: **See Google map**



Figure 11: Aerial view of study area. The blue circles indicate the possible heritage buildings; the green circle is the Headgear and the yellow the old entrance feature. The northernmost shed circled in blue is a recent addition to the structures located on the site, while the entrance gate feature was erected here after being brought in recently and therefore has no historical link with the site (Google Earth 2014 – Imagery date 2013/08/05).



Figure 12: Old No.4 Shaft Headgear.



Figure 13: Closer view of headgear.



Figure 14: Some of the old office buildings.



Figure 15: Warehouse building.



Figure 16: More office buildings and warehouse section.



Figure 17: Another structure on the property.



Figure 18: View of warehousing with headgear behind it.



Figure 19: Main building next to headgear.



Figure 20: Another view of the main warehouse next to the headgear.



Figure 21: Another view of the same building.



Figure 22: View of entrance feature. This structure was erected by the current tenant and does not form part of the historic fabric of the site as it was brought in from another location to the site.



Figure 23: View of Main warehouse with recent additions visible.

7. CONCLUSIONS AND RECOMMENDATIONS

In conclusion it is possible to say that the Phase 1 HIA for the proposed City Deep Extension 29 (N17 Park) development has been completed successfully. The area has been extensively developed over the last 100 years or so through various mining related activities and other industrial and commercial ventures. No archaeological (Stone Age or Iron Age) sites, features or objects were identified during the assessment, and if any did exist here in the past it would have been majorly disturbed or completely destroyed as a result.

A number of mining related structures, including the old No.4 Shaft headgear (City Deep Limited) and some warehousing and offices buildings are located on the property. The significance of these have been severely diminished as a result of changes and additions to them over the years, but it is recommended that a detailed assessment is carried out by a Mining Industrial/Architectural Heritage Specialist as part of a Phase 2 HIA should the proposed development have an impact on any of these.

From a Heritage point of view the development should however be allowed to continue, taking cognizance of the above recommendations and the proposed mitigation measures provided in the Discussion section of this document.

Furthermore, the subterranean presence of archaeological or historical sites, features or objects is always a possibility. This could include unknown and unmarked burial pits. Should any be uncovered during the development process a heritage specialist should be called in to investigate and recommend on the best way forward.

8. REFERENCES

Location and Layout Maps: Provided by iProp Proprietary Limited
Aerial views of study area location and sites/features identified: Google Earth 2014 – Imagery dates: 2013/08/05.

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Republic of South Africa. 1999. **National Heritage Resources Act** (No 25 of 1999). Pretoria: the Government Printer.

Republic of South Africa. 1998. **National Environmental Management Act** (no 107 of 1998). Pretoria: The Government Printer.

Archival Records and Websites

Chief Surveyor General Database: www.csg.dla.gov.za. Document Number 10HZUU01

South African National Archives: SAB. Vol.808. Reference Number MM2640/25.

www.on-the-rand.co.uk.

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.

Aesthetic 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)
- v. 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.