MUDZUNGA CONSULTING & ICT (PTY) LTD
Constantia Park, Building 16-2, 546, 16th Road,
Midrand, 1685
Cell: 0716859247 Tel: 011 037 1565
E-mail: sintegratedspecialist@gmail.com/trust.mlilo@gmail.com

PHASE 1: HERITAGE/ARCHAEOLOGICAL IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF RETHUSHENG SPECIAL SCHOOL IN LIMPOPO PROVINCE.

02 OCTOBER 2025

Author: Trust Mlilo

DOCUMENT SYNOPSIS

ITEM	DESCRIPTION
PROPOSED DEVELOPMENT AND LOCATION	Proposed Rethusheng Special School located on the Remaining Extent of Farm Cromford 690-LR within Blouberg Local Municipality, Capricorn District Municipality, Limpopo Province.
PURPOSE OF THE STUDY	The Phase 1 Archaeological Impact Assessment for the Proposed Rethusheng Special School located on the Remaining Extent of Farm Cromford 690-LR within Blouberg Local Municipality, Capricorn District Municipality, Limpopo Province.
MUNICIPALITIES	Blouberg Local Municipality, Capricorn District Municipality
PREDOMINANT LAND USE OF SURROUNDING AREA	Grazing and rural settlement
APPLICANT	**Department of Public Works, Roads and Infrastructure**
EAP	Ourbiosphere Environmental (Pty) Ltd Musa Netshivhambe, No 9 Lords Lane Street, Northview Estate, Bendor Park Polokwane, 0699 Tel: +27 73 977 9414 Fax: +27 86 567 5523 Email:musa@ourbiosphere.co.za www.ourbiosphere.co.za
HERITAGE PRACTITIONER	**MUDZUNGA CONSULTING & ICT (PTY) LTD** Constantia Park, Building 16-2, 546, 16th Road, Midrand, 1685 Cell: 0716859247 Tel: 011 037 1565 E-mail: trust.mlilo@gmail.com
AUTHOR	Trust Mlilo, PhD *Cand,* MA. (Archaeology)
DATE OF REPORT	02/10/ 2025

EXECUTIVE SUMMARY

This report serves to inform and guide the applicant and contractors about the possible impacts that the proposed Rethusheng Special School may have on heritage resources (if any) located in the study area. In the same light, the document must also inform South African heritage authorities (SAHRA) about the presence, absence and significance of heritage resources located within the proposed study site. This report is submitted in terms of Section 38 (8) of the National Heritage Resources Act 25 of 1999 as part of the proposed Rethusheng Special School. The purpose of this study is to identify, record and if necessary, salvage the irreplaceable heritage resources that may be impacted by the proposed development. In compliance with heritage legislation, Ourbiosphere Environmental (Pty) Ltd on behalf of the Department of Public Works, Roads and Infrastructure, tasked Mudzunga Consulting & ICT (Pty) Ltd to conduct a Phase 1 Archaeological and Heritage Impact Assessment (AIA/HIA) for the proposed development of Rethusheng Special School. Desktop studies, drive-throughs and fieldwalking were conducted in order to identify heritage landmarks within the proposed cemetery and associated infrastructure site. The study site is not on pristine ground, having seen significant transformations owing to previous and current activities. The study did not record any confirmable archaeological remains within the proposed Rethusheng Special School development site. The general project area is known for the occurrence of archaeological and historical sites. In terms of the built environment, the study did not record any buildings and structures older than 60 years within the proposed cemetery site. It should be noted that archaeological material and unmarked graves may exist in the area and when encountered during construction work, must be stopped forthwith, and the finds must be reported to the South African Heritage Resource Agency (SAHRA) or the heritage practitioner. This report must be submitted to the SAHRA for review in terms of Section 38 (4) of the NHRA.

The report makes the following observations:

- The findings of this report have been informed by desktop data review, field survey and impact assessment reporting, which include recommendations to guide heritage authorities in making decisions about the proposed development of Rethusheng Special School.
- The field survey was effective enough to cover the entire development site, especially significant sections of the project receiving environs.
- The immediate project area is predominantly rural settlements and grazing.
- Some sections of the proposed cemetery development site are severely degraded from previous and current land use activities.

The report sets out the potential impacts of the proposed development of Rethusheng Special School on heritage matters and recommends appropriate safeguard and mitigation measures that are designed to reduce the impacts where appropriate. The Report makes the following recommendations:

1. It is recommended that SAHRA endorse the report as having satisfied the requirements of Section 38 (8) of the NHRA requirements.
2. It is recommended that SAHRA make a decision in terms of Section 38 (4) of the NHRA to approve the proposed development of Rethusheng Special School.
3. From a heritage perspective supported by the findings of this study, the proposed development of Rethusheng Special School is supported. However, the construction should be approved under the observation that construction work does not extend beyond the area considered in this report/affect the identified heritage sites.
4. Should chance archaeological materials or human remains be exposed during clearing/construction work on any section of the cemetery development site, work should cease on the affected area, and the discovery must be reported to the heritage authorities immediately so that an investigation and evaluation of the finds can be made. The overriding objective, where remedial action is warranted, is to minimize disruption in construction scheduling while recovering archaeological and any affected cultural heritage data as stipulated by the NHRA regulations.
5. Subject to the recommendations herein made and the implementation of the mitigation measures and adoption of the project EMPR, there are no significant cultural heritage resource barriers to the proposed cemetery project. The Heritage authority may approve the proposed development of Rethusheng Special School from a heritage perspective.

This report concludes that the impacts of the proposed development of Rethusheng Special School on the cultural environmental values are not likely to be significant on the entire site if the EMP includes the recommended safeguard and mitigation measures identified in this report.

NATIONAL LEGISLATION AND REGULATIONS GOVERNING THIS REPORT

This is a specialist report' and is compiled in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2014.

DECLARATION OF INDEPENDENCE

In terms of Chapter 5 of the National Environmental Management Act of 1998, specialists involved in Impact Assessment processes must declare their independence.

I, **Trust Mlilo**, do hereby declare that I am financially and otherwise independent of the client and their consultants, and that all opinions expressed in this document are substantially my own, notwithstanding the fact that I have received fair remuneration from the client for the preparation of this report.

Expertise:

Trust Mlilo, PhD *cand* (Wits), MA. (Archaeology), BA Hons, PDGE and BA & (Univ. of Pretoria) ASAPA (Professional affiliation member) and more than 15 years of experience in archaeological and heritage impact assessment and management. Mlilo is an accredited member of the Association for Southern African Professional Archaeologists (ASAPA), Amafa akwaZulu Natali and Eastern Cape Heritage Resources Agency (ECPHRA). He has conducted more than hundred AIA/HIA Studies, heritage mitigation work and heritage development projects over the past 15 years of service. The completed projects vary from Phase 1 and Phase 2 as well as heritage management work for government, parastatals (Eskom), and several private companies such as BHP Billiton and Rhino Minerals.

Independence

The views expressed in this document are the objective, independent views of Mr Trust Mlilo and the survey was carried out under Mudzunga Consulting & ICT (Pty) Ltd. The company has no business, personal, financial, or other interest in the proposed development of Rethusheng Special School apart from fair remuneration for the work performed.

Conditions relating to this report.

The content of this report is based on the author's best scientific and professional knowledge as well as available information. Mudzunga Consulting & ICT (Pty) Ltd reserves the right to modify the report in any way deemed fit should new, relevant, or previously unavailable, or undisclosed information become known to the author from ongoing research or further work in this field or about this investigation.

This report must not be altered or added to without the prior written consent of the author and Mudzunga Consulting & ICT (Pty) Ltd. This also refers to electronic copies of the report, which are supplied for inclusion as part of other reports, including main reports. Similarly, any recommendations, statements or conclusions drawn from or based

on this report must make reference to this report. If these form part of a main report relating to this investigation or report, this report must be included in its entirety as an appendix or separate section to the main report.

Authorship: This AIA/HIA Report has been prepared by Mr Trust Mlilo (Professional Archaeologist). The report is for the review of the Heritage Resources Agency (PHRA).

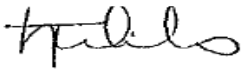
Geographic Co-ordinate Information**:** Geographic co-ordinates in this report were obtained using a hand-held Garmin Global Positioning System device. The manufacturer states that these devices are accurate to within +/- 5 m.

Maps**:** Maps included in this report use data extracted from the NTS Map and Google Earth Pro.

Disclaimer**:** The Authors are not responsible for omissions and inconsistencies that may result from information not available at the time this report was prepared.

The Archaeological and Heritage Impact Assessment Study was carried out within the context of tangible and intangible cultural heritage resources as defined by the SAHRA Regulations and Guidelines as to the approval of the proposed development of Rethusheng Special School, being proposed by the Department of Public Works, Roads and Infrastructure.

Signed by



05/ 10/ 2025

ACKNOWLEDGEMENTS

The author acknowledges Ourbiosphere Environmental (Pty) Ltd for their assistance with the project details and for responding to technical queries related to the project.

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ABBREVIATIONS

AIA	Archaeological Impact Assessment
ASAPA	Association of South African Professional Archaeologists
EIA	Environmental Impact Assessment
EIA	Early Iron Age *(EIA refers to both Environmental Impact Assessment and the Early Iron Age but in both cases the acronym is internationally accepted.*

EIAR	Environmental Impact Assessment Report
ESA	Early Stone Age
GPS	Global Positioning System
HIA	Heritage Impact Assessment
ICOMOS	International Council of Monuments and Sites
LIA	Late Iron Age
LFC	Late Farming Community
LSA	Late Stone Age
MIA	Middle Iron Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act 107 of 1998
NHRA	National Heritage Resources Act 25 of 1999
PHRA	Provincial Heritage Resource Agency
SAHRA	South African Heritage Resources Agency
ToR	Terms of Reference

KEY CONCEPTS AND TERMS

Periodization

Periodization Archaeologists divide the different cultural epochs according to the dominant material finds for the different time periods. This periodization is usually region-specific, such that the same label can have different dates for different areas. This makes it important to clarify and declare the periodization of the area one is studying. These periods are nothing a little more than convenient time brackets because their terminal and commencement are not absolute and there are several instances of overlap. In the present study, relevant archaeological periods are given below.

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)

Early Iron Age (~ AD 200 to 1000)

Late Iron Age (~ AD1100-1840)

Historic (~ AD 1840 to 1950, but a Historic building is classified as over 60 years old)

Definitions

Definitions Just like periodization, it is also critical to define key terms employed in this study. Most of these terms derive from South African heritage legislation and its ancillary laws, as well as international regulations and norms of best practice. The following aspects have a direct bearing on the investigation and the resulting report:

Cultural (heritage) resources are all non-physical and physical human-made occurrences, and natural features that are associated with human activity. These can be singular or in groups and include significant sites, structures, features, ecofacts and artefacts of importance associated with the history, architecture, or archaeology of human development.

Cultural significance is determined by means of aesthetic, historic, scientific, social, or spiritual values for past, present, or future generations.

Value is related to concepts such as worth, merit, attraction or appeal, concepts that are associated with the (current) usefulness and condition of a place or an object. Although significance and value are not mutually exclusive, in some cases the place may have a high level of significance but a lower level of value. Often, the evaluation of any feature is based on a combination or balance between the two.

Isolated finds are occurrences of artefacts or other remains that are not in-situ or are located apart from archaeological sites. Although these are noted and recorded, but do not usually constitute the core of an impact assessment, unless if they have intrinsic cultural significance and value.

In-situ refers to material culture and surrounding deposits in their original location and context, for example an archaeological site that has not been disturbed by farming.

Archaeological site/materials are remains or traces of human activity that are in a state of disuse and are in, or on, land and which are older than 100 years, including artefacts, human and hominid remains, and artificial features and structures. According to the National Heritage Resources Act (NHRA) (Act No. 25 of 1999), no archaeological artefact, assemblage or settlement (site) and no historical building or structure older than 60 years may be altered, moved or destroyed without the necessary authorisation from the South African Heritage Resources Agency (SAHRA) or a provincial heritage resources authority.

Historic material are remains resulting from human activities, which are younger than 100 years, but no longer in use, including artefacts, human remains and artificial features and structures.

Chance finds means archaeological artefacts, features, structures or historical remains accidentally found during development.

A grave is a place of interment (variably referred to as burial) and includes the contents, headstone or other marker of such a place, and any other structure on or associated with such place. A grave may occur in isolation or in association with others where upon it is referred to as being situated in a cemetery (contemporary) or burial ground (historic).

A site is a distinct spatial cluster of artefacts, structures, organic and environmental remains, as residues of past human activity.

Heritage Impact Assessment (HIA) refers to the process of identifying, predicting and assessing the potential positive and negative cultural, social, economic and biophysical impacts of any proposed project which requires authorisation of permission by law, and which may significantly affect the cultural and natural heritage resources. Accordingly, an HIA must include recommendations for appropriate mitigation measures for minimising or circumventing negative impacts, measures enhancing the positive aspects of the proposal and heritage management and monitoring measures.

Impact is the positive or negative effects on human well-being and / or on the environment.

Mitigation is the implementation of practical measures to reduce and circumvent adverse impacts or enhance beneficial impacts of an action.

Mining heritage sites refer to old, abandoned mining activities, underground or on the surface, which may date from the prehistorical, historical or the relatively recent past.

Study area or '**project area'** refers to the area where the developer wants to focus its development activities (refer to plan).

Phase I studies refer to surveys using various sources of data and limited field walking in order to establish the presence of all possible types of heritage resources in any given area.

Assumptions and disclaimer

The investigation has been influenced by the unpredictability of buried archaeological remains (absence of evidence does not mean evidence of absence) and the difficulty in establishing intangible heritage values. It should be remembered that archaeological deposits (including graves and traces of mining heritage) usually occur below the ground level. Should artefacts or skeletal material be exposed during construction activities, such activities should be halted immediately, and a competent heritage practitioner and SAHRA must be notified in order for an investigation and evaluation of the find(s) to take place (see NHRA (Act No. 25 of 1999), Section 36 (6). Recommendations contained in this document do not exempt the applicant from complying with any National, Provincial, and Municipal legislation or other regulatory requirements, including any protection or management or general provision in terms of the NHRA. Mudzunga Consulting & ICT (Pty) Ltd assumes no responsibility for compliance with conditions that may be required by SAHRA in terms of this report.

1. INTRODUCTION

Mudzunga Consulting & ICT (Pty) Ltd was retained by Ourbiosphere Environmental (Pty) Ltd on behalf of the Department of Public Works, Roads and Infrastructure to carry out a Phase 1 AIA/ HIA for the proposed development of Rethusheng Special School located on the Remaining Extent of Farm Cromford 690-LR within Blouberg Local Municipality, Capricorn District Municipality, Limpopo Province. This study was conducted to fulfil the requirements of Section 38 (8) of the NHRA. The purpose of this heritage study is to identify and assess any heritage resources that may be located within the proposed Rethusheng Special School development site in order to make recommendations for their appropriate management. To achieve this, we conducted background research of published literature, maps, and databases (desktop studies), which was then followed by ground-truthing by means of drive-through surveys and field walking. Desktop studies revealed that the general project area is rich in Late Stone Age (LSA) and historical sites. It should be noted that while heritage resources may have been located in the entire study area, subsequent developments, previous and agriculture, settlements, road and boundary fence lines have either obliterated these materials or reduced them to isolated finds that can only be identifiable as chance finds during construction. The proposed development of Rethusheng Special School may be approved, subject to adopting the recommendations and mitigation measures proposed in this report. Based on the findings there are no archaeological and heritage reasons why the proposed development of Rethusheng Special School cannot be approved, taking full cognizance of clear procedures to follow in the event of chance findings.

Terms of Reference (ToR)

Mudzunga Consulting & ICT (Pty) Ltd was requested by Ourbiosphere Environmental (Pty) Ltd to conduct an AIA/HIA study addressing the following issues:

- Archaeological and heritage potential of the proposed development of Rethusheng Special School, including any known data on affected areas.
- Provide details on methods of study; potential and recommendations to guide the SAHRA to make an informed decision in respect of authorization of the proposed development of Rethusheng Special School.
- Identify all objects, sites, occurrences and structures of an archaeological or historical nature (cultural heritage sites) located within the proposed Rethusheng Special School development site.
- Assess the significance of the cultural resources in terms of their archaeological, historical, scientific, social, religious, aesthetic and tourism value.
- Describe the possible impact of the proposed development of Rethusheng Special School on these cultural remains, according to a standard set of conventions.
- Propose suitable mitigation measures to minimize possible negative impacts on the cultural resources; and
- Review applicable legislative requirements.

Project Location

Rethusheng Special School, located on the Remaining Extent of Farm Cromford 690-LR, (S: 23°33'11.82", 28°57'23.19") at Mamehlabe Village in the Blouberg Local Municipality of Limpopo Province (see Figure 1-4)

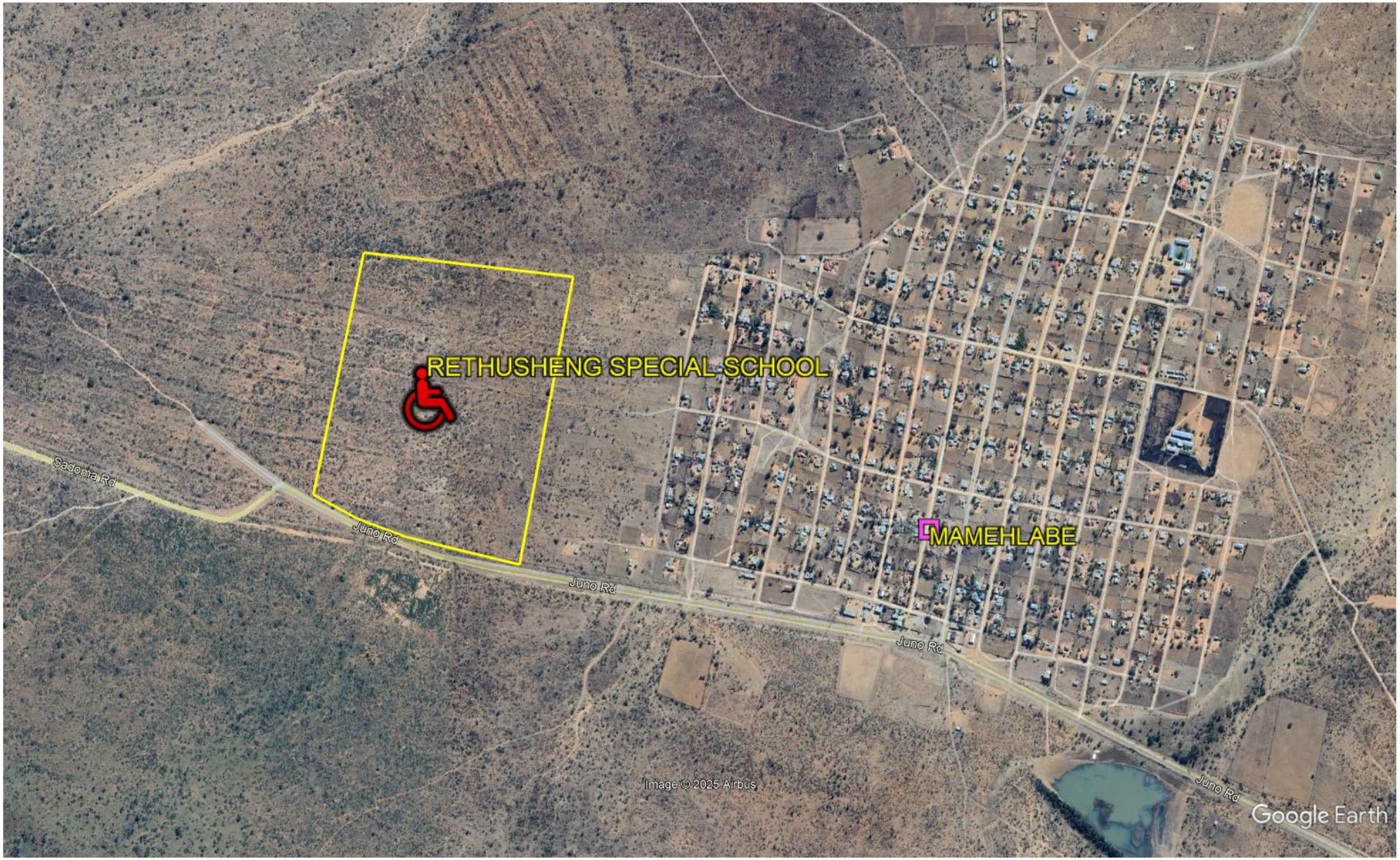

Figure 1: Google map of the proposed special school (*Ourbiosphere (Pty) Ltd, 2025)*

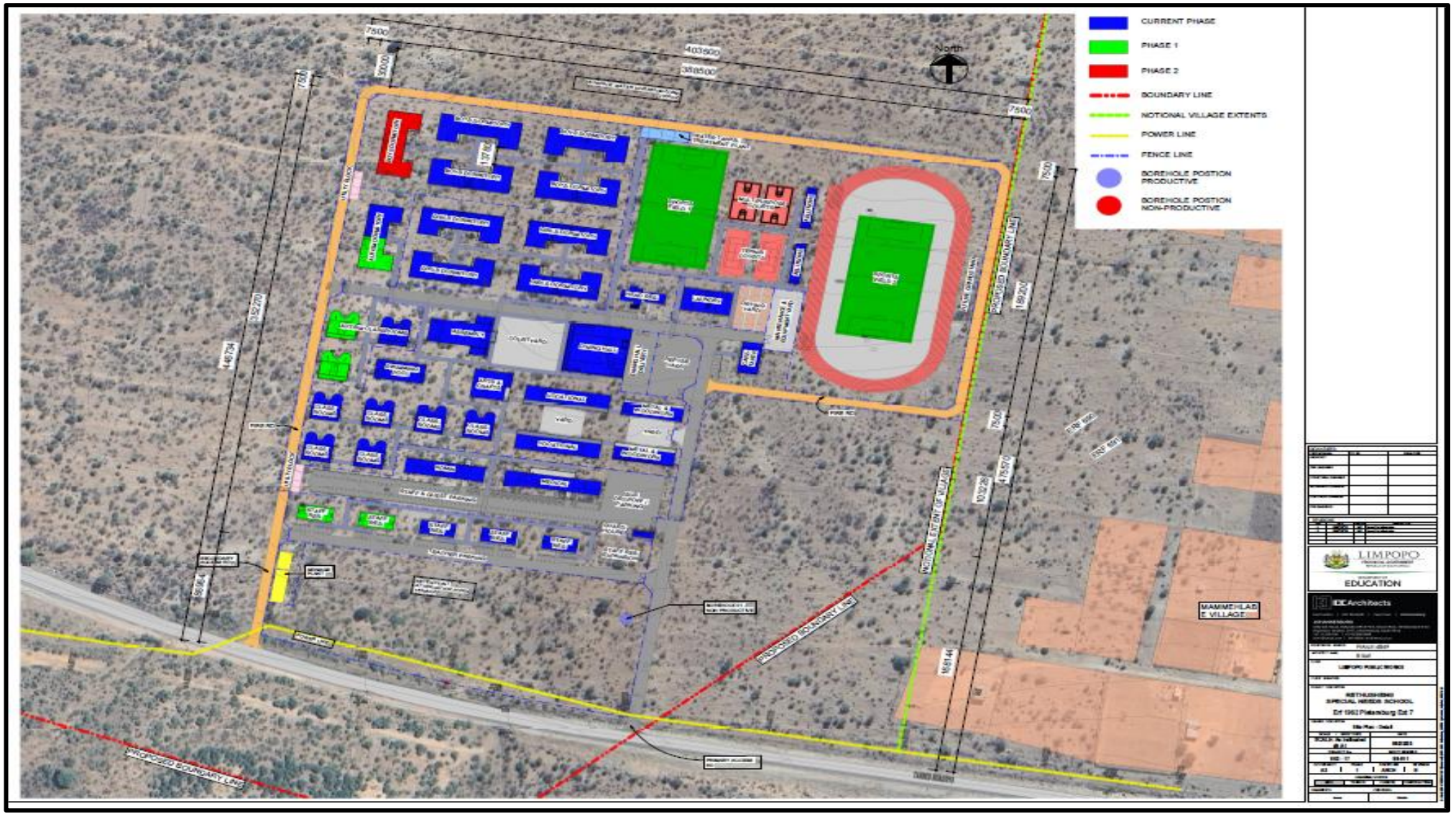

Figure 2: Locality map for the proposed special school *(Ourbiosphere (Pty) Ltd, 2025)*

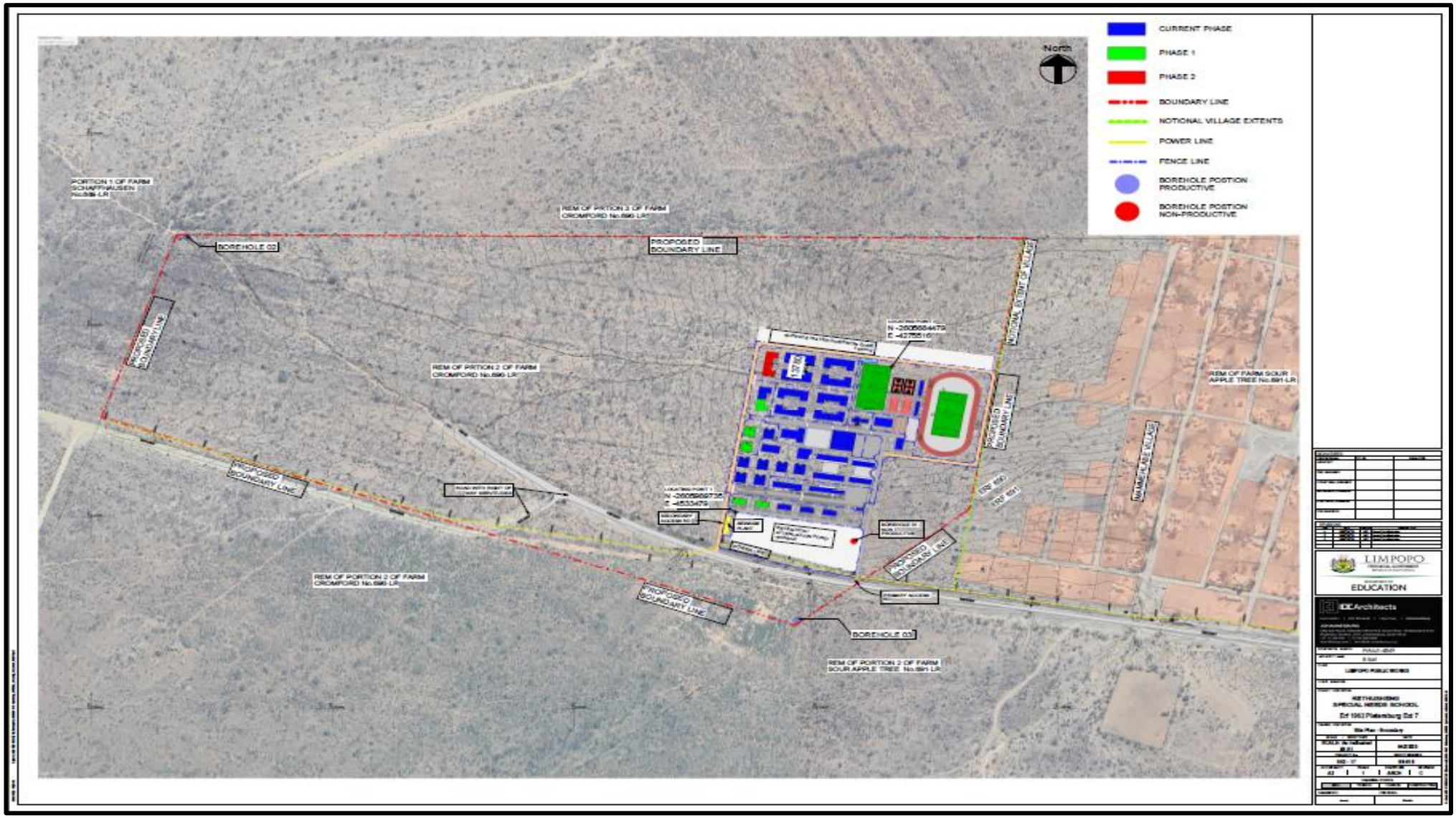

Figure 3: Site Layout plan for the proposed cemetery development *(Ourbiosphere, 2025*)

Figure 4: Harmony Park Memorial grave statistics *(Ourbiosphre, 2025)*

Project Description

Rethusheng Special School, Located on Remaining Extent of Farm Cromford 690-LR, (S: 23°33'11.82", 28°57'23.19"). will comprise of a boarding facility for learners with special needs, boys' & girl's dormitories, staff residence, classrooms, laundry, medical building, assembly hall, vocational room, care takers rooms, parking bays, arts and craft centre, ablutions, dining hall, wood and metal centre as well as two sports fields.

2. LEGISLATIVE CONTEXT

Three main pieces of legislations are relevant to the present study. The proposed development of Rethusheng Special School is submitted in terms of the National Environmental Management Act, 1998 (NEMA) Therefore, this is in fulfilment of the assessment of the impact to heritage resources as required by section 24(4)(b)(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). An AIA or HIA is required as a specialist sub-section of the environmental authorisation. This study was conducted in terms of Section 38(8) as part of environmental authorization. The provisions of this section do not apply to a development as described in subsection (1) if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act, 1989 (Act No. 73 of 1989), or the integrated environmental management guidelines issued by the Department of Environment Affairs and Tourism. Provided that the consenting authority must ensure that the evaluation fulfils the requirements of the relevant heritage resources authority in terms of subsection (3), and any comments and recommendations of the relevant heritage resources authority about such development have been taken into account before the granting of the consent.

Thus, any person undertaking any development in the above categories must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development. Section 38 (2) (a) of the same act also requires the submission of a heritage impact assessment report for authorization purposes to the responsible heritage resources agencies (SAHRA/PHRAs). Because the proposed development will change the character of a site exceeding 5000 m², an HIA is required according to this section of the Act.

Related to Section 38 of the NHRA are Sections 34, 35, 36 and 37. Section 34 stipulates that no person may **alter, damage, destroy or relocate any building or structure older than 60 years, without a permit issued by SAHRA or a provincial heritage resources authority**. This section may not apply to present study since none were identified. Section 35 (4) of the NHRA stipulates that no person may, without a permit issued by SAHRA, destroy, damage, excavate, alter, or remove from its original position, or collect, any archaeological material or object. This section may apply to any significant archaeological sites that may be discovered before or during construction. This means that any chance find must be reported to the heritage practitioner or SAHRA/PHRA, who will assist in investigating the extent and significance of the finds and inform the applicant about further actions. Such actions may entail the removal of material after documenting the find site or mapping of larger sections before

destruction. Section 36 (3) of the NHRA also stipulates that no person may, without a permit issued by the South African Heritage Resources Agency (SAHRA), 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. This section may apply in case of the discovery of chance burials, which is unlikely. The procedure for reporting chance finds also applies to the unlikely discovery of burials or graves by the applicant or his contractors. Section 37 of the NHRA deals with public monuments and memorials, but this may not apply to this study because no protected monument will be physically affected by the proposed development of Rethusheng Special School.

In addition, the EIA Regulations of 2014 (as amended in 2017) promulgated in terms of NEMA (Act 107 of 1998) stated that environmental assessment reports will include cultural (heritage) issues. The new regulations in terms of Chapter 5 of the NEMA provide for an assessment of development impacts on the cultural (heritage) and social environment and for Specialist Studies in this regard. The end purpose of such a report is to alert the applicant (Department of Public Works, Roads and Infrastructure), SAHRA/ PHRA and interested and affected parties about existing heritage resources that may be affected by the proposed development of a cemetery, and to recommend mitigatory measures aimed at reducing the risks of any adverse impacts on these heritage resources.

3. METHODOLOGY

Our HIA study was structured in five phases that is field survey, consultation, report compilation and report review. The methodology is informed by the SAHRA Guidelines on Impact assessment for development projects, as well as the relevant provisions of the local heritage and environmental legislation. We conducted desktop studies, field surveys, consultations, report compilation and report review.

Phase I: Desktop studies

Desktop studies are very crucial for the success of any project because they determine not just what is known but also can identify gaps which must be closed during the study to meet the aims and objectives of the project. Literature on the archaeology and heritage character of the project was reviewed. A review of SAHRIS and other databases was conducted online. Further review of the relevant local and international legal frameworks was also done. Furthermore, relevant documents, databases such as Google Earth and any other available information were consulted. As part of the desktop study, published literature and cartographic data, as well as archival data on heritage legislation, the history and archaeology of the area were studied.

The desktop studies were carried at university libraries, national libraries, local municipality libraries and archives. Electronic databases such as Google Earth, Google Maps and Google Images were consulted as well. Special attention was given to provincial and local authority development plans so that the HIA contributes to the attainment of local objectives.

Phase ii: Fieldwork

The project aims to provide the client with an HIA that will support decision-making in order to ensure protection of the heritage resource base of the project area. The heritage resources must be identified, assessed, and ranked. This enables a proper definition of the resource and its boundaries. This requires the participation of a multi-disciplinary team with experience in heritage management, heritage, palaeontology, planning and risk management fields. This fieldwork aimed to add to the gaps identified during the review of the existing documentation. The field survey was undertaken on the 29th of September 2025 by a team of two archaeologists. The study team covered the entire study site because it is clear. The focus of the survey involved a pedestrian survey, which was conducted across the proposed study site. The pedestrian survey focused on parts of the project area where it seemed as if disturbances may have occurred in the past, for example, bald spots in the grass veld; stands of grass which are taller than the surrounding grass veld; the presence of exotic trees; evidence for building rubble, and ecological indicators such as invasive weeds.

Detailed photographic recording was also undertaken where relevant. The findings were then analysed in view of the proposed cemetery development to suggest further action. The result of this investigation is a report indicating

the presence/absence of heritage resources and how to manage them in the context of the proposed development of Rethusheng Special School.

Phase iii: Consultation

The EIA Public Participation process will be conducted by the EAP and specialists. The EIA Public Participation Process will invite and address comments from affected communities and any registered heritage bodies on any matter related to the proposed development of Rethusheng Special School including heritage concerns that may arise as a result of the project.

Phase iv: Report compilation

Report compilation and impact assessment.

Phase v: Report review, finalisation and submission

Before the final draft of the HIA is submitted to the client, the report will be reviewed internally. The client will be provided with the opportunity make some input before the report is finalised.

Consultations

The Public Participation process is conducted by the EAP. The study team consulted farm owners who provided vital information about the heritage character of their area. The Public Participation Process will also invite and address comments from the public and any registered heritage bodies on any matter related to the proposed development of Rethusheng Special School, including heritage concerns that may arise relating to the construction activities.

The following photographs illuminate the nature and character of the Project Area.

Plate 1: showing the proposed development site.

Plate 2: showing the proposed development site.

Plate 3: showing the proposed development site.

Plate 4: showing the site earmarked for the proposed special school.

Plate 5 showing the proposed development site.

Plate 6: showing the proposed development site.

Plate 7: showing the proposed development site.

Plate 8: showing the proposed development site.

4. ARCHAEOLOGICAL\HISTORICAL CONTEXT

The project is located within the Blouberg Local Municipality, Capricorn District of Limpopo Province of South Africa that boasts a rich traditional history of contemporary Northern Sotho (Huffman 2007, Coetzee 2010). In terms of heritage resources, the Limpopo Province is pointedly well-known for its Iron Age Farmer archaeology related to State Formation in Iron Age Farmer communities of Southern Africa. As a result, the landscape has seen intensive archaeological research over a period of more than 80 years and research, commercial and popular publications on the MCL are ample. Significant Middle Iron Age sites are known to occur on the farms Skutwater and Bismarck in the far west. In his thesis, Van Ewyk (1996) identified the communities in these landscapes as a single, homogeneous Iron Age community practising a mixed farming economy based on agriculture and animal husbandry. These activities were supplemented by hunting and gathering, exploiting wild faunal and floral food resources. They were largely self-sufficient, as the only imports identified were metals and glass beads. He illustrated that these settlements were subject to a degree of control under the Mapungubwe polity. It can be assumed that the archaeology of Polokwane is closely intertwined in the Iron Age settlement pattern of the larger region of Limpopo.

Archaeological and heritage studies in the Limpopo region indicate that the area is of high pre-historic and heritage significance. It is, in fact, a cultural landscape where Stone Age, Iron Age and Historical period sites contribute the bulk of the cultural heritage of the region (also Calebrese 1996; Huffman, 2007; Murimbika, 2006; Schoeman, 2006; Meyer, 2000; van Doornum, 2008).

Stone Age sites are generally identifiable by stone artefacts found scattered on the ground surface, as deposits in caves and rock shelters, as well as in eroded gully or river sections. Archaeological sites recorded in the project region confirms the existence of Stone Age sites that conform to the generic SA periodization split into the Early

Stone Age (ESA) (2.5 million years ago to 250 000 years ago), the Middle Stone Age (MSA) (250 000 years ago to 22 000 years ago) and the Late Stone Age (LSA) (22 000 years ago to 300 years ago). Stone Age sites are known to be scattered across the Steelpoort Valley. For example, Stone Age sites have been recorded on several farms such as Hendriksplaats 281, Derde Gelid 278, Onverwacht 292, Winterveld 293, Annex Grootboom 335, Grootboom 336 and Apiesboomen 295. Research conducted in the Bushman Rock shelter near Ohrigstad indicates that the mountainous area in the Lydenburg Valley has MSA and LSA sites, but due to a lack of research, many of potential sites remain unknown. Rock paintings do occur in the Drakensberg Mountain ranges near Lydenburg for example a rock engraving site with engravings ranging from geometrical motifs to various animal figures has been recorded near Lydenburg. However, the specific affected project-receiving environment has low potential for Stone Age sites. Stone Age sites in the region are also associated with rock painting sites. Cave sites also exist in the landscape southwest of the project area. From an archaeological perspective, the Burgersfort Steelpoort area, like most of the Limpopo region, has the potential to yield Stone Age period sites (also see Deacon and Deacon, 1997). However, the specific affected project-receiving environment has low potential for Stone Age sites.

The Iron Age of the Limpopo region dates back to the 5th Century AD when the Early Iron Age (EIA) proto-Bantu-speaking farming communities began arriving in this region, which was then occupied by hunter-gatherers. These EIA communities are archaeologically referred to as the Kwale branch of the Urewe EIA Tradition (Huffman, 2007: 127-9). The Iron Age communities occupied the foothills and valley lands, introducing settled life, domesticated livestock, crop production and the use of iron (also see Maggs 1984a; 1984b; Huffman 2007). Alongside the Urewe Tradition was the Kalundu Tradition whose EIA archaeological sites have been recorded along the Limpopo region. Limpopo region is known for the famous golden rhino that was recovered from the Iron Age settlement site of Mapungubwe in the Limpopo Shashi Valley, now a UNESCO World Heritage Site. The Limpopo region is also known for the Zimbabwe tradition sites such as Thulamela and Dzata to the northeast, in the modern-day Venda region. From about 15 00 AD the region was occupied by new coming groups of Late Iron Age farmers of the Kalundu Tradition (ibid). The region was the centre of immigration and migration of different African groups, some of which are ancestors of the contemporary Sotho and Tsonga predominant in the region.

The period c. A.D 950 – 1350 AD was dominated by ceramics that were derived from the preceding EIA and which have been called the Eiland (Evers 1981) or Heringbone pottery (Denbow 1983). At Eiland itself there is an apparent gap between this final phase of the Early Iron Age and Letaba. Available radiocarbon dates to Letaba ceramics range from the early 17th – 19th centuries (Evers 1981). There were two unrelated ceramic styles in the 12th (Eiland) and 19th century (Letaba). Earlier groups comprised two ceramic styles that are Moloko and Kgopolwe. Moloko and Kgopolwe are contemporary with general similarities to Eiland, which is the third development of the Western Stream Early Iron Age immigrants. The ceramic remains in the area mainly comprise of Marateng Pottery. According to oral tradition, the Koni settled in the escarpment before the Pedi between 1600AD and 1650AD.

Throughout the middle of the 1800s the region witnessed the Mfecane migrations and displacements linked to groups such as the Ndebele of Mzilikazi. In 1826 Mzilikazi devastated the Koni communities in the Sekhukhune area. The Pedi recovered under Sekwati. Sekwati was however assassinated by his half-brother Mampuru in 1882. He was succeeded by his son Sekhukhune reunited the Pedi under his chieftaincy. From the 1840s the Voortrekker began arriving in the flat lands foothills in the regions spreading northeast into modern day Limpopo. They spread establishing settlements, which came to be settler towns such as Schoemansdale, Petersburg, and the Louis Trichardt across modern day Limpopo. The Voortrekkers arrived in Limpopo regions in the shadow of the weakened African kingdoms and chiefdoms in the aftermath of the Mfecane. This effectively ushered in new era of colonial occupation by succeeding Afrikaans and British colonial administration authorities through the last half of the 1800s and into the last 1900s. By 1850s the region witnessed the influx of more settler communities which triggered settler wars between the African chiefdoms and the incoming Afrikaner settlers. Some of these colonial wars and battles lasted into Anglo-Boer wars of 1899-1902. The later effectively led to complete subjugation of African communities to settler administration starting as part of the ZAR of Transvaal. There after the region was subsequently annexed by the British and effectively placed the majority of African communities under the Union of South Africa in 1910, which eventually ended with the establishment of the new South Africa in 1994.

Before the arrival of Europeans, the area was home to Bantu-speaking peoples such as the Sotho Tswana. White settlers were largely self-sufficient, relying on cattle/sheep farming and also hunting. Few towns were established, and farming remains the most dominant economy. It is not clear when Iron Age people first arrived in the area; however, it is thought that they first moved into the area around by AD 400 – AD 700. Such an assumption is based on sites that have been found in the Steelpoort River valley, dating to the Early Iron Age and belonging to the Doornkop phase of the Early Iron Age, dating AD 600 – AD 900. Most of these sites are located on flat plateaus close to the Steelpoort River. It is possible that after this Phase, the Eiland Phase dating AD 1000 could have followed. And finally, the Pedi and also the Swazi/ Ndebele groups, could have been next.

According to oral tradition, Sotho people migrated from Central Africa, the Hurutshe group, which is part of the Sotho groups and on which it is acceptable that Pedi originated arrived in part of this South Africa around the 16th century. In the late 1600 the Bapedi settled south of Steelpoort station. Sekwati, the Pedi chief established himself at Phiring, during that era, Voortrekkers under Louis Trichardt and Hendrik Potgieter in 1845 and 1853 pass through the Pedi people, such was followed by land encroachment and stock theft which resulted in tension between Pedi and Afrikaners. As a result, Sekwati decided to move from Phiring to Thaba Mosega in 1853. This movement was followed by peaceful agreement, which was consented in 1857 between the two groups, and made Steelpoort River the boundary. When Sekwati died, he was succeeded by a vicious Sekhukhune, his son who became the chief by force, and subjugated his half-brother Mampuru who was the rightful heir. The discovery of gold in the region in 1871 and failure to mine in 1875 led President Burgers to conclude that Pedi were obstructing progress. 1876 marked the beginning of the first war between Pedi and Afrikaners. Nonetheless, in 1877 Transvaal was seized by Britain, and the Pedi along with other groups were considered British's subject, and payment amounting to 2000

cattle was needed. However, Sekhukhune's refusal to pay such an amount resulted in conflicting views. War was then declared on the Pedi by the British who were supported by the Swazi, and Sekhukhune eventually surrendered on the 2nd of December 1879 and was thus imprisoned in Pretoria. His surrender resulted in killing of all his sons, and Maphuru who was previously defeated and had to flee, was annex as the chief of the Pedi. On the 28th of November 1879 Sekhukhune was captured and Pedi defeated. Sekhukhune was released from jail in 1881 and returned to the Pedi. However, in 1882 he was killed on Mampuru's orders. Mampuru also had conflict with the Afrikaners" and had to flee the area.

The pattern of land dispossession was similar to that elsewhere in Limpopo: white farmers would settle in an area amidst black communities; they then announce that they owned the land of which the boundaries had in the meantime been surveyed by the (white) government; black families would be required to furnish a certain amount of unpaid labour per year (usually three to six months for men, and two weeks per month for women), failing which they would be required to leave; and, over time, more and more households would be regarded as excess relative to white farmers' needs and would be forced to leave (Aliber, M & Maluleke, T. 2010). The process of dispossession was therefore often protracted, and labour tenant labour was gradually replaced with wage labour (Aliber, M & Maluleke, T. 2010).

The unification of the colonies into a single entity saw a renewed effort to create a national infrastructure. Following the Anglo-Boer War many families tried to rebuild their lives and their farms. Due to the good offices of Senator GG Munnik the railway line from Pietersburg was extended via Zoekmekaar to Louis Trichardt. In Pietersburg, the railway going north was extended after having been approved in 1909. Railways were extended to Bandolierkop via Soekmekaar; to Louis Trichardt by 1911 and Messina by 1914. The line to Rhodesia was completed in 1929. Groot Spelonken was a rugged rural area, northeast of Polokwane, centred around a little hamlet called Zoekmekaar (now called Morebeng in the Limpopo Province of South Africa). Loan farms were awarded to Boer farmers from about 1880 (apparently to create and populate a rural buffer for the ZAR). During the Apartheid years, many of the northernmost Groot Spelonken farms were bought by the Government and transferred to black tribal authorities (Aliber, M & Maluleke. 2010). In a bizarre turnaround, some of the land was later returned and made available commercially for white ownership. Some of the 'original' white owners were able and fortunate to reclaim and re-buy some of the farms in question.

Brief history of the project area

Polokwane, previously named Pietersburg, is the largest urban centre in the Limpopo Province of South Africa with a diverse and rich history. In Early History, the area surrounding Polokwane has been inhabited for centuries, with archaeological evidence revealing Stone Age and Iron Age settlements. Indigenous groups such as the Bapedi, Basotho, and Venda have long called this region home.

During the Colonial Era of the 1880s, Pietersburg was founded by Voortrekkers who settled in the area. Named after Voortrekker leader Petrus Jacobus Joubert, the town flourished as a vital trading post and agricultural center due to its strategic location. When the Voortrekkers arrived in the region, they set up settlements in various locations. One of the earliest settlements, in 1836, was in Zoutpansberg, north of Pietersburg (http://www.polokwane.org.za/).

The history of Pietersburg (now Polokwane) and its surroundings is marked by significant events and conflicts. Initially, two groups led by Boer leaders Hans van Rensburg and Louis Trichardt arrived in the area, but tension between them led to their separation. Trichardt's group settled temporarily near salt pans in Zoutpansberg before moving to Delagoa Bay. In 1845, Andries Hendrik Potgieter established the first Afrikaner settlement in Ohrigstad, later founding Zoutpansbergdorp in 1848. Potgieter played a role in the Sand River Convention of 1852, securing independence for the Transvaal as the Zuid Afrikaanse Republiek (ZAR), although conflicts with Pretorius hindered stability (*http://www.polokwane.org.za/).*

The town of Vredenburg (later Pietpotgietersrus) was founded at Makapanspoort under Potgieter's influence, while Schoeman renamed Schoemansdal after his marriage to Potgieter's widow. The ZAR faced challenges from the Venda under Magato and conflicts with the British and Pedi. Gold discoveries in 1871 led to an influx of foreigners and tensions with the British, culminating in the annexation of the Transvaal in 1877. The Anglo-Boer War broke out in 1880, resulting in Boer victory and self-government under British suzerainty. Piet Joubert established Pietersburg in 1886, following the abandonment of Potgietersrus and Schoemansdal. The town quickly developed, attracting settlers and establishing cultural and political institutions like the Nederduitse Gereformeerde Kerk. Tensions escalated, leading to the South African War in 1899, ending with the Boer capitulation in 1902.

Wars and Conflicts, including the Anglo-Boer War (1899-1902), left a lasting impact on Pietersburg during the late 19th and early 20th centuries, shaping the region and its inhabitants. It was the temporary capital in 1900 of both the Transvaal and the Orange Free State during the South African War (1899–1902), and the British occupied Pietersburg in 1901 *(South African History Online)*. Throughout the Apartheid Era from the mid-20th century until the early 1990s, Pietersburg, like much of South Africa, endured apartheid policies that enforced racial segregation, profoundly affecting the city's social and economic dynamics. The defeat spurred the Afrikaans Movement, promoting Afrikaans literature and a nationalist consciousness. Louis Botha's Het Volk movement won elections after Transvaal gained self-government in 1905, marking a new era of governance and identity in the region.

Following the dismantling of apartheid and the establishment of democracy in 1994, Pietersburg underwent a significant transformation (Peter Baxter, 2010). In 2002, the city officially adopted the name Polokwane, which translates to "place of safety" in Northern Sotho.

Today, Polokwane stands as a pivotal Economic and Cultural Hub within Limpopo Province. Renowned for its agricultural activities, such as citrus farming, as well as its thriving mining and manufacturing sectors, the city also hosts numerous cultural events, festivals, and sporting tournaments that enrich community life (Donaldson, 1999).

Over the years, Polokwane has experienced substantial Infrastructure Development, including expanded road networks, healthcare facilities, educational institutions, and recreational amenities. These developments have been crucial in supporting the city's growing population and economic activities.

Polokwane's history is a testament to its resilience and the diverse contributions of its communities, shaping the social, economic, and cultural fabric of South Africa.

Intangible Heritage

As defined in terms of the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003) intangible heritage includes oral traditions, knowledge and practices concerning nature, traditional craftsmanship and rituals and festive events, as well as the instruments, objects, artefacts and cultural spaces associated with group(s) of people. Thus, intangible heritage is better defined and understood by the particular group of people who uphold it. In the present study area, very little intangible heritage is anticipated on the development footprint because most historical knowledge does not suggest a relationship with the study area, even though several other places in the general area.

SAHRIS Database and Impact Assessment Reports in the proposed project area

Several archaeological and heritage studies were conducted within the project area since 2002, and these present the nature and heritage character of the area. The HIA conducted in the area also provides some predictive evidence regarding the types and ranges of heritage resources to be expected in the proposed project area: (see reference list for HIA reports). The studies include mining, water pipeline and powerline projects. by Roodt 1999, Roodt 2011, 2017a, 2017b,2017c. A survey of these reports observed that they all lack detail to provide a strong archaeological background for the study area. However, according to the archaeological cultural distribution sequences by Huffman (2007), Polokwane area falls within the distribution area of various cultural groupings originating out of both the Urewe Tradition (eastern stream of migration) and the Kalundu Tradition (western stream of migration). Huffman (2007) states that the Iron Age is better documented in the Soutpansberg and toward Polokwane, where large settlements of people are known. Which means that the proposed project area might have been subject to systematic archaeological study and hence gaps in the archaeological background. Roodt (2011, 2017a, 2017b, 2017c) did not record any surficial archaeological evidence or any structures older than 60 years within his study area. Roodt (2017) noted that the area contains no evidence of ritual or spiritual activities, and no graves were observed at the borrow pit sites. However, the archaeological remains may be present as obscured subterranean deposits

5. RESULTS OF THE FIELD STUDY

The literature survey suggests that prior to the 20th century, the general project area would have been a rewarding region to locate heritage resources related to the Stone Age and particularly the Iron Age and historical sites (Bergh 1999). However, the situation today is completely different. The study area now lies on a clearly modified landscape that has previously been cleared for residential developments and agriculture.

Archaeology

The proposed development of Rethusheng Special School site was surveyed for archaeological remains; however, given the previous and current destructive land use activities, no confirmable archaeological remains were identified during the survey (see Figure 1 & Plates 1-16). Based on the field study results and field observations, the receiving environment for the proposed development of Rethusheng Special School site is low to medium potential to yield previously unidentified archaeological sites during construction. Literature review also revealed that no archaeological sites are shown on a map contained in a historical atlas of this area. This, however, should rather be seen as a lack of research in the area and not as an indication that such features do not occur.

Burial grounds and Graves

Human remains and burials are commonly found close to archaeological sites and abandoned settlements; they may be found in abandoned and neglected burial sites or occur sporadically anywhere because of prehistoric activity, victims of war, conflict or crime. It is often difficult to detect the presence of archaeological human burials on the landscape, as these burials, in most cases, are not marked at the surface and concealed by dense vegetation cover. Human remains are usually identified when they are exposed through erosion, earth-moving activities, mining and construction. In some instances, packed stones or bricks may indicate the presence of informal burials. If any human bones are found during the course of construction work, then they should be reported to an archaeologist and work in the immediate vicinity should cease until the appropriate actions have been carried out by the archaeologist. Where human remains are part of a burial, they would need to be exhumed under a permit from either SAHRA (for pre-colonial burials as well as burials later than about AD 1500) or Department of Health for graves younger than 60 years.

The field survey did not record any burial sites within the proposed Rethusheng Special School development site. As such the proposed development of Rethusheng Special School may be approved without any further investigation and mitigation in terms of Section 36 of the NHRA.

It should be noted that burial grounds and gravesites are accorded the highest social significance threshold (see Appendix 3). They have both historical and social significance and are considered sacred. Wherever they exist or not, they may not be tampered with or interfered with without a permit from SAHRA. It should also be borne in mind

that the possibility of encountering human remains during subsurface earth-moving works anywhere on the landscape is ever present. The possibility of encountering previously unidentified burial sites is low to medium within the Rethusheng Special School development site; however, should such sites be identified during construction, they are still protected in terms of Section 36 of NHRA.

Public Monuments and Memorials

The study did not record any public memorials and monuments within the proposed Rethusheng Special School development site. As such the proposed development may be approved without any further investigation and mitigation in terms of Section 27 of the NHRA.

Buildings and Structures

The survey did not identify any historical buildings and structures within the proposed development site. As such, the proposed project may be approved without any further investigation and mitigation in terms of Section 34 of the NHRA, which protects buildings and structures that are older than 60 years.

6. IMPACTS ASSESSMENT

An impact can be defined as any change in the physical-chemical, biological, cultural, and/or socio-economic environmental system that can be attributed to human activities related to the project site under study for meeting a project need. A quantitative impact assessment will be conducted for the project. The method to be used makes use of the basic risk assessment approach of deriving an expression for risk from the product of likelihood (probability) and consequences.

The main objective of the impact assessment is to identify the negative impacts that can be avoided and/or mitigated and the benefits of the positive impacts during the planning, operation and decommissioning and rehabilitation phases of the proposed project on the environment. The impact assessment is aimed at predicting potential impacts of the proposed project. Impact assessment strives to avoid damage, loss of ecosystem services, and, where they cannot be avoided, to reduce and mitigate these impacts (DEA, 2013). Offsets to compensate for loss of habitat are regarded as a last resort, after all efforts have been made to avoid, reduce and mitigate. The mitigation hierarchy is represented in **Table 6**.

The significance of the impacts will be assessed considering the following descriptors:

Impact Identification

The study will identify impacts (positive and negative) associated with the project. The study will be required to specify the type of impact (direct/indirect) and will include an assessment of cumulative impacts that may occur because of the proposed project.

Impact Assessment Methodology

All the identified potential impacts were assessed according to the following Impact Assessment Methodology, as described below. This methodology has been utilised for the assessment of heritage impacts where the consequence (severity of impact, spatial scope of impact and duration of impact) and likelihood (frequency of activity and frequency of impact) have been considered in parallel to provide an impact rating and hence an interpretation in terms of the level of environmental management required for each impact.

The first stage of any impact assessment is the identification of potential heritage activities, aspects and impacts which may occur during the commencement and implementation of a project. This is supported by the identification of receptors and resources, which allows for an understanding of the impact pathway and an assessment of the sensitivity to change. Heritage impacts (social and biophysical) are then identified based on the potential interaction between the aspects and the receptors/resources.

The significance of the impact is then assessed by rating each variable numerically according to defined criteria as outlined in **Table 3**. The purpose of the rating is to develop a clear understanding of influences and processes associated with each impact. The severity, spatial scope and duration of the impact together comprise the consequence of the impact, and when summed can obtain a maximum value of 15. The frequency of the activity and the frequency of the impact together comprise the likelihood of the impact occurring and can obtain a maximum value of 10. The values for likelihood and consequence of the impact are then read off a significance rating matrix table. This matrix thus provides a rating on a scale of 1 to 150 (low, medium low, medium high or high) based on the consequence and likelihood of a heritage impact occurring.

Natural and existing mitigation measures, including built-in engineering designs, are included in the pre-mitigation assessment of significance. Measures such as demolishing of infrastructure, and reburial of graves, are considered post-mitigation.

SEVERITY OF IMPACT	RATING
Insignificant / non-harmful	1
Small / potentially harmful	2
Significant / slightly harmful	3
Great / harmful	4
Disastrous / extremely harmful	5

SPATIAL SCOPE OF IMPACT	RATING
Activity specific	1
Project area specific (within the proposed development of Rethusheng Special School site)	2
Local area	3
Regional (Municipal area)	4
National	5

DURATION OF IMPACT	RATING
One day to one month	1
One month to one year	2
One year to ten years	3
Life of operation	4
Post closure / permanent	5

CONSEQUENCE

FREQUENCY OF ACTIVITY / DURATION OF ASPECT	RATING
Annually or less / low	1
6 monthly / temporary	2
Monthly / infrequent	3
Weekly / life of operation / regularly / likely	4

FREQUENCY OF IMPACT	RATING
Almost never / almost impossible	1
Very seldom / highly unlikely	2
Infrequent / unlikely / seldom	3
Often / regularly / likely / possible	4
Daily / highly likely / definitely	5

LIKELIHOOD

Table 1: Impact Assessment Parameter Ratings

CONSEQUENCE

LIKELIHOOD

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2	4	6	8	10	12	14	16	18	20	22	24	26	28	30
3	6	9	12	15	18	21	24	27	30	33	36	39	42	45
4	8	12	16	20	24	28	32	36	40	44	48	52	56	60
5	10	15	20	25	30	35	40	45	50	55	60	65	70	75
6	12	18	24	30	36	42	48	54	60	66	72	78	84	90
7	14	21	28	35	42	49	56	63	70	77	84	91	98	105
8	16	24	32	40	48	56	64	72	80	88	96	104	112	120
9	18	27	36	45	54	63	72	81	90	99	108	117	126	135
10	20	30	40	50	60	70	80	90	100	110	120	1	140	150

	High	76 to 150	Improve current management
	Medium High	40 to 75	Maintain current management
	Medium Low	26 to 39	
	Low	1 to 25	No management required

SIGNIFICANCE = CONSEQUENCE x LIKELIHOOD

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Loss of Heritage/Impact Statement

The main cause of impacts on archaeological sites is direct physical disturbance of the archaeological remains themselves and their contexts. It is important to note that the heritage and scientific potential of an archaeological site is highly dependent on its geological and spatial context. This means that, even though, for example, deep excavation may expose buried archaeological sites and artefacts, the artefacts are relatively meaningless once removed from their original position. The primary impacts are likely to occur during clearance; indirect impacts may occur during the movement of heavy construction vehicles. Any additional excavation for foundations, temporary camp sites will result in the relocation or destruction of all existing surface heritage material (if any are present).

Similarly, the clearing of access roads will impact on material that lies buried in the topsoil. Since heritage sites, including archaeological sites, are non-renewable, it is important that they are identified and their significance assessed before construction. It is important to note that due to the localized nature of archaeological resources, individual archaeological sites could be missed during the survey, although the probability of this is very low within the Rethusheng Special School development site. Further, archaeological sites and unmarked graves may be buried beneath the surface and may only be exposed during surface clearance. The purpose of the AIA is to assess the sensitivity of the area in terms of archaeology and to avoid or reduce the potential impacts of the proposed development of Rethusheng Special School by means of mitigation measures (see appended Chance Find Procedure). There is still a possibility of finding archaeological remains buried beneath the ground. It is the considered opinion of the author that the chances of recovering significant archaeological materials is present within the Rethusheng Special School development site.

Pre & Construction/operational phase

Table 2: Loss of heritage during construction phase.

Loss of Heritage					
Phase	**Construction**				
Criteria	**Details / Discussion**				
Description of impact	• Disturbance of buried archaeological remains during deep excavation. • Accidental exposure of buried archaeological remains. • Stamping of archaeological remains by the movement of heavy construction vehicles.				
Mitigation required	• Use existing farm tracks and roads. • Use chance find procedure to manage accidental finds				
Parameters	***Intensity***	***Spatial scale***	***Duration***	***Probability***	***Significance***
Pre-Mitigation	Serious (3)	Limited (2)	Short-term (3-5 years) (3)	Likely (4)	Major (negative) (36)
Post Mitigation	Limited (2)	Minor (2)	Short-term (3-5 years) (3)	Likely (4)	Minor (negative) (36)

Decommissioning/post construction/closure phase

No direct loss of heritage resources is expected during this phase of the project. However, indirect impacts may occur during the movement of vehicles.

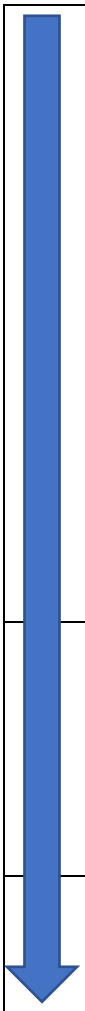
Table 3: Loss of heritage during decommissioning/closure phase.

Loss of heritage					
Phase	**Decommissioning (Removal of infrastructure and equipment)**				
Criteria	**Details / Discussion**				
Description of impact	• Stamping of archaeological remains by moving vehicles. • Accidental damage to buried heritage resources by moving vehicles				
Mitigation required	• Using existing tracks and roads to remove infrastructure and equipment. • Use a chance find procedure to manage any accidental exposure /damage of heritage resources.				
Parameters	***Intensity***	***Spatial scale***	***Duration***	***Probability***	***Significance***
Pre-Mitigation	Serious (4)	Limited (2)	Short-term (3-5 years) (3)	Likely (4)	Major (negative) (36)
Post Mitigation	Limited (3)	Minor (2)	Short-term (3-5 years) (3)	Likely (4)	Minor (negative) (36)

Table 4: Impact Assessment Ratings

Heritage Aspect	• Nature of potential impact/risk	• Heritage Impact Significance Before Mitigation							• Impact Management Actions (Proposed Mitigation Measures)	• Heritage Impact Significance After Mitigation						
		• Consequence			• Probability					• Consequence			• Probability			
		Severity •	Spatial •	Duration •	Frequency: Activity •	Frequency: Impact •	Significance •	Significance Rating •	• Management and Mitigation Measures	Severity •	Spatial •	Duration •	Frequency: Activity •	Frequency: Impact •	Significance •	Significance Rating •
Loss of Heritage	Archaeological remains	2	2	2	3	3	36	Medium-Low	*Chance finds procedure * Appended Chance find procedure * Construction team must be educated on importance of heritage * Mitigation is not required	2	2	2	3	3	36	Medium-Low
	Burial grounds and Graves	2	2	2	3	3	36	Medium-Low		2	2	2	3	3	36	Medium-Low
	Building and structure	2	2	2	3	3	36	Medium-Low		2	2	2	3	3	36	Medium-Low
	Public monuments and plaques	2	2	2	3	3	36	Medium-Low		2	2	2	3	3	36	Medium-Low

Table 5: Mitigation hierarchy of impacts

	**Avoid or Prevent**	Refers to considering options in project location, siting, scale, layout, technology and phasing to avoid impacts on heritage. This is the best option, but is not always possible. Where environmental and social factors give rise to unacceptable negative impacts, development of a cemetery should not take place. In such cases, it is unlikely to be possible or appropriate to rely on the other steps in the mitigation.
	Minimise	Refers to considering alternatives in the project location, sitting, scale, layout, technology and phasing that would minimise impacts on heritage. In cases where there are heritage constraints, every effort should be made to minimise impacts.
	Rehabilitate	Refers to rehabilitation of areas where impacts are unavoidable, and measures are provided to return impacted areas to near natural state or an agreed land use after mine closure. Rehabilitation can, however, fall short of replicating the diversity and complexity of natural systems.
	Offset	Refers to measures over and above rehabilitation to compensate for the residual negative impacts on heritage after every effort has been made to minimise and then rehabilitate the impacts. Heritage offsets can provide a mechanism to compensate for significant residual impacts on biodiversity.

A small portion of the property with the remaining cultural landscape is anticipated to be lost due to the proposed development of Rethusheng Special School. The impact of the proposed activity will involve the loss of heritage.

Cumulative Impacts

Cumulative impacts are defined as impacts that result from incremental changes caused by other past, present, or reasonably foreseeable actions together with the project. Therefore, the assessment of cumulative impacts for the proposed development of Rethusheng Special School is considered the total impact associated with the proposed project when combined with other past, present, and reasonably foreseeable future developments projects. The impacts of the proposed development of Rethusheng Special School were assessed by comparing the post-project situation to a pre-existing baseline. This section considers the cumulative impacts that would result from the combination of the proposed development of Rethusheng Special School.

This proposed development of Rethusheng Special School combined with other proposed project activities will effectively transform the landscape and will spoil the visual quality of the area within the proposed Rethusheng Special School development site. The cumulative impact will negatively affect the landscape quality of the area which is ordinarily considered to be source. The frequency of development proposals in the area has the potential to collectively change the character of the landscape. The once-isolated landscape will see volumes of people establishing temporary camp sites during construction. In the long run the accumulative impact will be of medium significance in terms of its potential to change the characteristics and quality of the landscape in the long run. The field survey focused on the potential of lithic tools and rock engravings that are known to occur in the study area.

Mitigation

Mitigation is not required for the proposed Rethusheng Special School on the basis that the study did not identify any heritage resources that require further investigation and mitigation. It The construction teams must be inducted on how to identify heritage resources during construction and the reporting procedure in accordance with the appended Chance find procedure. A copy of the chance finds procedure must be kept at the site office to ensure appropriate management of any accidental finds during construction.

7. DISCUSSION

Various specialists have conducted several Phase 1 Archaeological/ Heritage studies since 2002, and these present the nature and heritage character of the area. The studies include mining, water pipeline and powerline projects. However, none of these studies were done near the proposed project site. The proposed project site has been altered by agricultural lands to the extent that significant archaeological remains would not have survived in the area. However, given that the area was inhabited by indigenous communities in the past, there is the potential of encountering unmarked and forgotten graves in the study area. A survey of literature in the study area suggests that there is a gap of knowledge in the study area (see Huffman 2007). The potential for encountering subsurface LIA remains ranges from low to medium on the proposed development site (See the appended Chance find procedure for handling of chance find). The lack of confirmable archaeological sites recorded during the current survey is thought to be a result of previous clearance and ploughing that may have destroyed surface remains. However, the absence of confirmable and significant archaeological cultural heritage sites is not evidence in itself that such sites did not exist within the proposed development site. It should be noted that significance of the site of Interest (the development site) is not limited to presence or absence of physical archaeological sites.

8. CONCLUSION

Mudzunga Consulting & ICT (Pty) Ltd was tasked by Ourbiosphere Environmental (Pty) Ltd on behalf of the Department of Public Works, Roads and Infrastructure to carry out a HIA for the Proposed Rethusheng Special School located on the Remaining Extent of Farm Cromford 690-LR within Blouberg Local Municipality, Capricorn District Municipality, Limpopo Province. The study did not identify any confirmable archaeological sites within the proposed Rethusheng Special School development site. As such, in terms of archaeology, there are no obvious 'Fatal Flaws' or 'No-Go' areas. However, the potential for chance finds, remains, and the applicant and contractors are urged to be diligent during construction. The procedure for reporting chance finds has clearly been laid out, and if this report is adopted by SAHRA, then there are no archaeological reasons why the proposed development of Rethusheng Special School cannot be approved. In terms of Section 34 of the NHRA, the study did not identify any buildings and structures older than 60 years that require protection. The study did not identify any burial sites within the proposed Rethusheng Special School development site. As such, the proposed development of Rethusheng Special School may be approved in terms of Section 27, 34,35 and 36 without any further investigation and mitigation.

9. RECOMENDATIONS

Report makes the following recommendations:

1. It is recommended that SAHRA endorse the report as having satisfied the requirements of Section 38 (8) of the NHRA requirements.
2. It is recommended that SAHRA make a decision in terms of Section 38 (4) of the NHRA to approve the proposed development of Rethusheng Special School on the basis that no significant heritage resources were identified within the proposed cemetery site.
3. From a heritage perspective supported by the findings of this study, the proposed development of Rethusheng Special School is supported. However, the construction should be approved under the observation that construction work does not extend beyond the area considered in this report/affect the identified heritage sites.
4. Should chance archaeological materials or human remains be exposed during clearing/construction work on any section of the cemetery site, work should cease on the affected area, and the discovery must be reported to the heritage authorities immediately so that an investigation and evaluation of the finds can be made. The overriding objective, where remedial action is warranted, is to minimize disruption in construction scheduling while recovering archaeological and any affected cultural heritage data as stipulated by the NHRA regulations.
5. Subject to the recommendations herein made and the implementation of the mitigation measures and adoption of the project EMPR, there are no significant cultural heritage resources barriers to the proposed development of Rethusheng Special School. The Heritage authority may approve the proposed development of Rethusheng Special School from a heritage perspective.

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APPENDIX 1: CHANCE FIND PROCEDURE FOR THE PROPOSED RETHUSHENG SPECIAL SCHOOL LOCATED ON THE REMAINING EXTENT OF FARM CROMFORD 690-LR WITHIN BLOUBERG LOCAL MUNICIPALITY, CAPRICORN DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.

OCTOBER 2025

ACRONYMS

BGG	Burial Grounds and Graves
CFPs	Chance Find Procedures
ECO	Environmental Control Officer
HIA	Heritage Impact Assessment
ICOMOS	International Council on Monuments and Sites
NHRA	National Heritage Resources Act (Act No. 25 of 1999)
SAHRA	South African Heritage Resources Authority
SAPS	South African Police Service
UNESCO	United Nations Educational, Scientific and Cultural Organisation

11. CHANCE FIND PROCEDURE

Introduction

An Archaeological Chance Find Procedure (CFP) is a tool for the protection of previously unidentified cultural heritage resources during construction. The main purpose of a CFP is to raise awareness of all construction workers and management on site regarding the potential for accidental discovery of cultural heritage resources and establish a procedure for the protection of these resources. Chance Finds are defined as potential cultural heritage (or paleontological) objects, features, or sites that are identified outside of or after Heritage Impact studies, normally as a result of construction monitoring. Chance Finds may be made by any member of the project team who may not necessarily be an archaeologist or even a visitor. Appropriate application of a CFP on development projects has led to the discovery of cultural heritage resources that were not identified during archaeological and heritage impact assessments. As such, it is considered to be a valuable instrument when properly implemented. For the CFP to be effective, the site manager must ensure that all personnel working within the proposed cemetery site understand the CFP and the importance of adhering to it if cultural heritage resources are encountered. In addition, training or induction on cultural heritage resources that might potentially be found on site should be provided. In short, the Chance find procedure details the necessary steps to be taken if any culturally significant artefacts are found during construction.

Definitions

In short, the term 'heritage resource' includes structures, archaeology, meteors, and public monuments as defined in the South African National Heritage Resources Act (Act No. 25 of 1999) (NHRA) Sections 34, 35, and 37. Procedures specific to burial grounds and graves (BGG) as defined under NHRA Section 36 will be discussed separately, as this requires the implementation of separate criteria for CFPs.

Background

The proposed Rethusheng Special School is located on the Remaining Extent of Farm Cromford 690-LR within Blouberg Local Municipality, Capricorn District Municipality, Limpopo Province. The proposed project is subject to heritage survey and assessment at the planning stage and construction in accordance with Section 38(8) of NHRA. These surveys are based on surface indications alone, and it is therefore possible that sites or significant archaeological remains can be missed during surveys because they occur beneath the surface. These are often accidentally exposed in the course of construction or any associated construction work and hence the need for a Chance Find Procedure to deal with accidental finds. In this case

an extensive Archaeological Impact Assessment was completed by Mlilo (2024) for the proposed development of Rethusheng Special School. The AIA/HIA was very comprehensive, covering the entire site. The current study (Mlilo 2025) did not record any archaeological material within the proposed development of Rethusheng Special School site.

Purpose

The purpose of this Chance Find Procedure is to ensure the protection of previously unrecorded heritage resources within the proposed Rethusheng Special School development site. This Chance Find Procedure intends to provide the applicant and contractors with an appropriate response in accordance with the NHRA and international best practice. This CFP aims to avoid or reduce project risks that may occur as a result of accidental finds whilst considering international best practice. In addition, this document seeks to address the probability of archaeological remains finds and features becoming accidentally exposed during construction and the movement of construction equipment. The proposed development of Rethusheng Special School has the potential to cause severe impacts on significant tangible and intangible cultural heritage resources buried beneath the surface or concealed by dense grass cover. Mudzunga Consulting & ICT (Pty) Ltd developed this Chance Find Procedure to define the process which govern the management of Chance Finds during construction. This ensures appropriate treatment of chance finds while also minimizing disruption of the construction schedule. It also enables compliance with the NHRA and all relevant regulations. Archaeological Chance Find Procedures are to promote preservation of archaeological remains while minimizing disruption of construction scheduling. It is recommended that due to the moderate archaeological potential of the project area, all site personnel and contractors be informed of the Archaeological Chance Find procedure and have access to a copy while on site. This document has been prepared to define the avoidance, minimization and mitigation measures necessary to ensure that negative impacts to known and unknown archaeological remains as a result of project activities are prevented or, where this is not possible, reduced to as low as reasonably practical during construction.

Thus, this Chance Finds Procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a professional archaeologist or other appropriately qualified person to its rescue or salvage.

GENERAL CHANCE FIND PROCEDURE

General

The following procedure is to be executed in the event that archaeological material is discovered:

- All construction/clearance activities in the vicinity of the accidental find/feature/site must cease immediately to avoid further damage to the find site.
- Briefly note the type of archaeological materials you think you have encountered, and their location, including, if possible, the depth below the surface of the find
- Report your discovery to your supervisor, or if they are unavailable, report to the project ECO, who will provide further instructions.
- If the supervisor is not available, notify the Environmental Control Officer immediately. The Environmental Control Officer will then report the find to the Site Manager who will promptly notify the project archaeologist and SAHRA.
- Delineate the discovered find/ feature/ site and provide 30m buffer zone from all sides of the find any other project and a 100m buffer zone for mining projects.
- Record the find GPS location, if able.
- All remains are to be stabilised *in situ.*
- Secure the area to prevent any damage or loss of removable objects.
- Photograph the exposed materials, preferably with a scale (a yellow plastic field binder will suffice).
- The project archaeologist will undertake the inspection process in accordance with all project health and safety protocols under the direction of the Health and Safety Officer.

- **Finds rescue strategy**: All investigation of archaeological soils will be undertaken by hand, all finds, remains, and samples will be kept and submitted to a museum as required by the heritage legislation. In the event that any artefacts need to be conserved, the relevant permit will be sought from the SAHRA.
- An on-site office and finds storage area will be provided, allowing storage of any artefacts or other archaeological material recovered during the monitoring process.
- In the case of human remains, in addition, to the above, the SAHRA Burial Ground Unit will be contacted, and the guidelines for the treatment of human remains will be adhered to. If skeletal remains are identified, an archaeologist will be available to examine the remains.

- The project archaeologist will complete a report on the findings as part of the proposed development of Rethusheng Special School.
- Once authorization has been given by SAHRA, the Applicant will be informed when construction activities can resume.

Management of chance finds

Should the Heritage specialist conclude that the find is a heritage resource protected in terms of the NRHA (1999) Sections 34, 36, 37 and NHRA (1999) Regulations (Regulation 38, 39, 40), Mudzunga Consulting & ICT (Pty) Ltd will notify SAHRA and/or PHRA on behalf of the applicant. SAHRA/PHRA may require that a search and rescue exercise be conducted in terms of NHRA Section 38. This may include rescue excavations, for which Mudzunga Consulting & ICT (Pty) Ltd will submit a rescue permit application, having fulfilled all requirements of the permit application process.

In the event that human remains are accidently exposed, SAHRA Burial Ground Unit or Mudzunga Consulting & ICT (Pty) Ltd Heritage Specialist must immediately be notified of the discovery in order to take the required further steps:

a. Heritage Specialist to inspect, evaluate and document the exposed burial or skeletal remains and determine further action in consultation with the SAPS and Traditional authorities:

b. Heritage specialist will investigate the age of the accidental exposure to determine whether the find is a burial older than 60 years under the jurisdiction of SAHRA or that the exposed burial is younger than 60 years under the jurisdiction of the Department of Health in terms of the Human Tissue Act.

c. The local SAPS will be notified to inspect the accidental exposure in order to determine where the site is a scene of crime or not.

d. Having inspected and evaluated the accidental exposure of human remains, the project Archaeologist will then track and consult the potential descendants or custodians of the affected burial.

e. The project archaeologist will consult with the traditional authorities, local municipality, and SAPS to seek endorsement for the rescue of the remains. Consultation must be done in terms of NHRA (1999) Regulations 39, 40, 42.

f. Having obtained consent from affected families and stakeholders, the project archaeologist will then compile a Rescue Permit application and submit it to the SAHRA Burial Ground and Graves Unit.

g. As soon as the project archaeologist receives the rescue permit from SAHRA, he will, in collaboration with the company/contractor, arrange for the relocation in terms of logistics and appointing of an experienced undertaker to conduct the relocation process.

h. The rescue process will be done under the supervision of the archaeologist, the site representative and affected family members. Retrieval of the remains shall be undertaken in such a manner as to reveal the stratigraphic and spatial relationship of the human skeletal remains with other archaeological features in the excavation (e.g., grave goods, hearths, burial pits, etc.). A catalogue and bagging system shall be utilised that will allow ready reassembly and relational analysis of all elements in a laboratory. The remains will not be touched with the naked hand; all Contractor personnel working on the excavation must wear clean cotton or non-powdered latex gloves when handling remains in order to minimise contamination of the remains with modern human DNA. The project archaeologist will document the process from exhumation to reburial.

i. Having fulfilled the requirements of the rescue/burial permit, the project archaeologist will compile a mitigation report which details the whole process from discovery to relocation. The report will be submitted to SAHRA and to the client.

Note that the relocation process will be informed by SAHRA Regulations and the wishes of the descendants of the affected burial.

APPENDIX 2: HERITAGE MANAGEMENT PLAN INPUT INTO THE PROPOSED DEVELOPMENT OF RETHUSHENG SPECIAL SCHOOL

Objective	• Protection of archaeological sites and land considered to be of cultural value. • Protection of known physical cultural property sites against vandalism, destruction and theft; and • The preservation and appropriate management of new archaeological finds should these be discovered during construction.							
No.	Activity	Mitigation Measures	Duration	Frequency	Responsibility	Accountable	Contacted	Informed
Pre-Construction Phase								
1	Planning	Ensure all known sites of cultural, archaeological, and historical significance are demarcated on the site layout plan and marked as no-go areas.	Throughout Project	Weekly Inspection	Contractor [C] CECO	SM	ECO	EA EM PM
Construction Phase								
1	Emergency Response	Should any archaeological or physical cultural property heritage resources be exposed during excavation for the purpose of construction, construction in the vicinity of the finding must be stopped until heritage authority has cleared the development to continue.	N/A	Throughout	C CECO	SM	ECO	EA EM PM
		Should any archaeological, cultural property heritage resources be exposed during excavation or be found on development site, a registered heritage specialist or LIHRA official must be called to site for inspection.		Throughout	C CECO	SM	ECO	EA EM PM
		Under no circumstances may any archaeological, historical or any physical cultural property heritage material be destroyed or removed form site;		Throughout	C CECO	SM	ECO	EA EM PM
		Should remains and/or artefacts be discovered on the development site during earthworks, all work will cease in the area affected, and the Contractor will immediately inform the Construction Manager, who in turn will inform LIHRA		When necessary	C CECO	SM	ECO	EA EM PM
		Should any remains be found on site that is potentially human remains, the LIHRA and South African Police Service should be contacted.		When necessary	C CECO	SM	ECO	EA EM PM
Rehabilitation Phase								
		Same as construction phase.						
Operational Phase								
		Same as construction phase.						

APPENDIX 4: LEGAL PRINCIPLES OF HERITAGE RESOURCES MANAGEMENT IN SOUTH AFRICA

Extracts relevant to this report from the National Heritage Resources Act No. 25 of 1999, (Sections 5, 36 and 47):

General principles for heritage resources management

5. (1) All authorities, bodies and persons performing functions and exercising powers in terms of this Act for the management of heritage resources must recognise the following principles:

(a) Heritage resources have lasting value in their own right and provide evidence of the origins of South African society and as they are valuable, finite, non-renewable and irreplaceable they must be carefully managed to ensure their survival;

(b) every generation has a moral responsibility to act as trustee of the national heritage for succeeding generations and the State has an obligation to manage heritage resources in the interests of all South Africans.

(c) heritage resources have the capacity to promote reconciliation, understanding and respect, and contribute to the development of a unifying South African identity; and

(d) heritage resources management must guard against the use of heritage for sectarian purposes or political gain.

(2) To ensure that heritage resources are effectively managed

(a) the skills and capacities of persons and communities involved in heritage resources management must be developed; and

(b) provision must be made for the ongoing education and training of existing and new heritage resources management workers.

(3) Laws, procedures and administrative practices must

(a) be clear and generally available to those affected thereby;

(b) in addition to serving as regulatory measures, also provide guidance and information to those affected thereby; and

(c) give further content to the fundamental rights set out in the Constitution.

(4) Heritage resources form an important part of the history and beliefs of communities and must be managed in a way that acknowledges the right of affected communities to be consulted and to participate in their management.

(5) Heritage resources contribute significantly to research, education and tourism and they must be

developed and presented for these purposes in a way that ensures dignity and respect for cultural values.
(6) Policy, administrative practice and legislation must promote the integration of heritage resources conservation in urban and rural planning and social and economic development.
(7) The identification, assessment and management of the heritage resources of South Africa must—
(a) take account of all relevant cultural values and indigenous knowledge systems;
(b) take account of material or cultural heritage value and involve the least possible alteration or loss of it;
(c) promote the use and enjoyment of and access to heritage resources, in a way consistent with their cultural significance and conservation needs;
(d) contribute to social and economic development;
(e) safeguard the options of present and future generations; and
(f) be fully researched, documented and recorded.

Burial grounds and graves

36. (1) Where it is not the responsibility of any other authority, SAHRA must conserve and generally care for burial grounds and graves protected in terms of this section, and it may make such arrangements for their conservation as it sees fit.
(2) SAHRA must identify and record the graves of victims of conflict and any other graves which it deems to be of cultural significance and may erect memorials associated with the grave referred to in subsection (1), and must maintain such memorials.
(3) (a) No person may, without a permit issued by SAHRA or a provincial heritage resources authority
(a) destroy, damage, alter, exhume or remove from its original position or 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, 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 equipment, or any equipment which assists in the detection or recovery of metals.
(4) SAHRA or a provincial heritage resources authority may not issue a permit for the destruction or damage of any burial ground or grave referred to in subsection (3)(a) unless it is satisfied that the applicant has made satisfactory arrangements for the exhumation and re-interment of the contents of such graves, at the cost of the applicant and in accordance with any regulations made by the responsible heritage resources

authority.

(5) SAHRA or a provincial heritage resources authority may not issue a permit for any activity under subsection (3)(b) unless it is satisfied that the applicant has, in accordance with regulations made by the responsible heritage resources authority

(a) made a concerted effort to contact and consult communities and individuals who by tradition have an interest in such grave or burial ground; and

(b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.

(6) Subject to the provision of any other law, any person who in the course of development or any other activity discovers the location of a grave, the existence of which was previously unknown, must immediately cease such activity and report the discovery to the responsible heritage resources authority which must, in co-operation with the South African Police Service and in accordance with regulations of the responsible heritage resources authority

(a) carry out an investigation for the purpose of obtaining information on whether or not such grave is protected in terms of this Act or is of significance to any community; and

(b) if such grave is protected or is of significance, assist any person who or community which is a direct descendant to make arrangements for the exhumation and re-interment of the contents of such grave or, in the absence of such person or community, make any such arrangements as it deems fit.

(7) (a) SAHRA must, over a period of five years from the commencement of this Act, submit to the Minister for his or her approval lists of graves and burial grounds of persons connected with the liberation struggle and who died in exile or as a result of the action of State security forces or agents provocateur and which, after a process of public consultation, it believes should be included among those protected under this section.

(b) The Minister must publish such lists as he or she approves in the Gazette.

(8) Subject to section 56(2), SAHRA has the power, with respect to the graves of victims of conflict outside the Republic, to perform any function of a provincial heritage resources authority in terms of this section.

(9) SAHRA must assist other State Departments in identifying graves in a foreign country of victims of conflict connected with the liberation struggle and, following negotiations with the next of kin, or relevant authorities, it may re-inter the remains of that person in a prominent place in the capital of the Republic.

General policy

47. (1) SAHRA and a provincial heritage resources authority—

(a) must, within three years after the commencement of this Act, adopt statements of general policy for

the management of all heritage resources owned or controlled by it or vested in it; and

(b) may from time to time amend such statements so that they are adapted to changing circumstances or in accordance with increased knowledge; and

(c) must review any such statement within 10 years after its adoption.

(2) Each heritage resources authority must adopt for any place which is protected in terms of this Act and is owned or controlled by it or vested in it, a plan for the management of such place in accordance with the best environmental, heritage conservation, scientific and educational principles that can reasonably be applied taking into account the location, size and nature of the place and the resources of the authority concerned, and may from time to time review any such plan.

(3) A conservation management plan may at the discretion of the heritage resources authority concerned and for a period not exceeding 10 years, be operated either solely by the heritage resources authority or in conjunction with an environmental or tourism authority or under contractual arrangements, on such terms and conditions as the heritage resources authority may determine.

(4) Regulations by the heritage resources authority concerned must provide for a process whereby, prior to the adoption or amendment of any statement of general policy or any conservation management plan, the public and interested organizations are notified of the availability of a draft statement or plan for inspection, and comment is invited and considered by the heritage resources authority concerned.

(5) A heritage resources authority may not act in any manner inconsistent with any statement of general policy or conservation management plan.

(6) All current statements of general policy and conservation management plans adopted by a heritage resources authority must be available for public inspection on request.