PHASE I ARCHAEOLOGICAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION OF STUDENT ACCOMODATION AND ASSOCIATED INFRASTRUCTRE IN SOSHANGUVE, BLOCK M, WITHIN THE JURISDICTION OF THE CITY OF TSHWANE METROPOLITAN MUNICIPALITY

September 2025

564 16th road, Building no 2, Constantia park, Midrand,1685
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DECLARATION

ABILITY TO CONDUCT THE PROJECT

Munyadziwa Magoma is a professional archaeologist, having obtained his BA degree in Archaeology and Anthropology at University of South Africa (UNISA), an Honours degree at the University of Venda (UNIVEN), and a Master's degree at the University of Pretoria (UP). He is an accredited Cultural Resource Management (CRM) member of the Association for southern African Professional Archaeologists (ASAPA) and KwaZulu-Natal Amafa and Research Institute. Munyadziwa is further affiliated to the South African Archaeological Society (SAAS), the Society of Africanist Archaeologists (SAfA), Historical Association of South Africa (HESA); Anthropology Southern Africa (ASnA); International Association for Impact Assessment (IAIAsa); International Council on Monuments and Sites (ICOMOS) and the International Council of Archaeozoology (ICAZ). He has more than fifteen years' experience in heritage management, having worked for different CRM organisations and government heritage authorities. As a CRM specialist, Munyadziwa has completed well over 3000 Archaeological Impact Assessments (AIA) for developmental projects situated in several provinces of the Republic of South Africa. The AIAs projects he has been involved with are diverse, and include the establishment of major substation, upgrade and establishment of roads, establishment and extension of mines. In addition, he has also conducted Heritage Impact Assessments (HIAs) for the alteration to heritage buildings and the relocation of graves. His detailed CV is available on request.

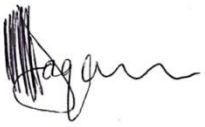
Philisiwe Phillips is a qualified archeologist, having obtained a BA degree in Archaeology and Anthropology at the University of Pretoria (UP), an Honours degree in Archaeology at the University of Pretoria (UP) focusing on testing the reliability of microfauna analysis as a proxy in paleoenvironmental reconstruction using barn owl pellets. Philisiwe has experience in Heritage Management, involving Heritage Research and has volunteered as an archeological Field and Lab Technician at the University of Pretoria, which further developed her technical skills. She has undertaken Archaeological Impact Assessments and relocation of graves project and is a member of South African Archaeological Student society (SAASS).

INDEPENDENCE

We, Munyadziwa Magoma and Philisiwe Phillip declare that this report has been prepared independently of any influence as may be specified by all relevant department, institution and organization. We act as the independent specialist in this application, and will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant. We declare that there are no circumstances that may compromise my objectivity in performing such work, we vow to comply with all relevant Act, Regulations and applicable Legislation. Furthermore, Vhubvo Consultancy Cc, which is a company we represent in this application, is an independent service provider and apart from fair remuneration for services rendered, it has no financial interest or vested interest in the proposed project.

AUTHOR AND CONTACT DETAILS:

Munyadziwa Magoma,



Tel: 011 312 2878 Tel:
E-mail: munyadziwa@vhubvo.co.za

Philisiwe Phillip,

Tell: 011 312 2878
E-mail: philisiwe@vhubvo.co.za

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``Report Outline

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

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of - (i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae	Section A
(b) Declaration that the specialist is independent in a form as may be specified by the competent authority	Declaration of Independence
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 4
(cA) an indication of the quality and age of base data used for the specialist report	Section 5
(d) Duration, Date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 5
(e) Description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 5
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of site plan identifying site alternatives	Section 8
(g) Identification of any areas to be avoided, including buffers	Section 10
(h) Map superimposing the activity including the associated structures and infrastructure On the environmental sensitivities of the site including areas to be avoided, including Buffers	Section 10
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 5
(j) a description of the findings and potential implications of such findings on the impact of the proposed activity including identified alternatives on the environment or activities	Section 9
(k) Mitigation measures for inclusion in the EMPr	Section 10
(I) Conditions for inclusion in the environmental authorisation	Section 10
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10
(n) Reasoned opinion - (i) as to whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and (ii) if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 10
(o) Description of any consultation process that was undertaken during the course of preparing the specialist report	Section 5
(p) A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Refer to the EIA report
(q) Any other information requested by the competent authority	No other information is requested at this time

EXECUTIVE SUMMARY

Introduction

Vhubvo Consultancy Cc has been appointed by Selahle Consultancy and Projects to conduct a Phase I Archeological and Heritage Impact Assessment study for the proposed construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M, within the jurisdiction of the City of Tshwane Metropolitan Municipality, Gauteng Province. The study was conducted with the main objective of investigating the availability of archaeological sites, cultural resources, sites associated with oral histories, graves, cultural landscapes, and any structures of historical significance that may be affected by the proposed construction. Further, the study aims to recommend a viable option from a cultural heritage perspective and advise on mitigation measures should any sites be impacted, these mitigations will, in turn, assist the developer in making decisions on the most appropriate option (s) in line with the National Heritage Resources Act, 1999 (Act 25 of 1999). To reach a defensible recommendation, both a desktop study, interviews and a field survey were conducted. The desktop study was undertaken through the South African Heritage Resources Information System (SAHRIS) for previous Archaeological Impact Assessments conducted in the region of the proposed development, and for research that has been carried out in the wider area over past years.

Need of the Project

The proposed project aims to construct approximately 2000 student accommodation beds for the Tshwane University of Technology (TUT) on ERF 1305, Soshanguve Block M. This development will be formally known as the TUT Soshanguve Student Village in Pretoria.

Restrictions and Assumptions

The site is largely covered by stones, resulting in a visible concentration of rocks across the area. Although prehistoric burial sites are often represented by cairns or stone mounds, no graves or burial features were identified during the foot survey. Some portions of the proposed development area are disturbed by human activities. Sections of the site are currently used as an informal dumping ground by local residents, and evidence of waste burning and scattered debris was observed. Due to this level of disturbance and prevailing weathering conditions, no significant archaeological resources are expected to be present on the surface. Nevertheless, as with any survey, archaeological materials may be under the surface and unidentifiable to the surveyor until they are exposed once construction starts. As a result, should any archaeological/ or gravesite be observed during the construction stage, a heritage specialist monitoring the development must immediately be notified. In the meantime, no further disturbance may be made until the heritage specialist can assess the find in question. The developer is responsible for protecting the site from publicity (i.e., media) until all assessments are made. Note must be taken that there was no underground detection, as such, information was collected from interviews from locals, as well as from field survey. Furthermore, there was no underground

search that had been conducted since such could have required a permit from relevant Authority and or Agencies. Despite this, care was undertaken to collect as much information of the proposed area as possible.

Methodology and Approach

The study method refers to the SAHRA Policy Guidelines for impact assessment, 2012. As part of this impact assessment; the following process were followed:

- Literature Review: To understand the background of the area, a background study was undertaken, and relevant institutions were consulted. These studies entail review of archaeological and heritage impact assessment studies that have been conducted around the proposed area thorough SAHRIS. In addition, E-journal platforms such as J-stor, Google scholars and History Resource Centre were searched;
- Oral Interview: The determination of heritage values relies mostly on direct consultation with individuals in the community. Individuals with knowledge of heritage resources (graves) in the study area where contacted. Consultation was designed to elicit information which may facilitate understanding of heritage values and identification of character-defining elements on the site; and
- The final step involved the recording and documentation of relevant heritage resources, as well as the assessment of resources in terms of the heritage impact assessment criteria and report writing, mapping and constructive recommendations.

Table 1: Possibility of archaeological/ heritage material in the area.

Landscape type	Description	Occurrence still possible	Likely occurrence
Archaeology	Early, Middle and Late Stone Age; Iron Age;	Yes Yes	Rather unlikely Chance finding
Burial and Graves	Pre-colonial burials; Graves of victims of conflict; Graves older than 100 years; Graves older than 60 years; Graves younger than 60 years;	Yes	Rather unlikely Chance finding
Built Environment	Formal public spaces; Historical structures; Area associated with social identity/ displacement;	Yes	Rather unlikely
Historic Farmland	Historical farm yards; Historical farm workers villages; Irrigation furrows; Historical routes; Distinctive types of planting;	Yes	Rather unlikely
Landscape usage	Sites associated with living heritage e.g., initiation school sites; Sites of political conflict; Sites associated with a historic event/ person;	Yes	Rather unlikely

Historic rural Town	Historic mission settlements;	Yes	Rather unlikely

Survey Findings

The main aim of the Archaeological Impact Assessment (AIA) was to identify heritage sites (i.e., sites associated with oral histories, graves, cultural landscapes, and any structure of historical significance) within the footprints of the area proposed construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M. In addition, the study aims to advice on mitigation measures where necessary. Where applicable and informed by mitigation measures, Selahle Consultancy & Projects will be assisted in acquiring the necessary permits as per the requirements of the National Heritage Resource Act (no. 25 of 1999).

Overall, the main conclusion reached is the following:

- The archaeological and cultural heritage impact assessment for the proposed construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M in Tshwane Metropolitan Municipality, Gauteng Province revealed no archaeological (Stone and Iron Ages) or historical material in the footprint of the study.

The following are the recommendations based on the main conclusion of the study:

- Noting that no archaeological materials were observed during the survey, Selahle Consultancy and Projects is reminded that most archaeological materials are normally found underground, as such should any archaeological material be unearthed accidentally during construction, the Provincial Heritage Resources Authority Gauteng (PHRAG) should be alerted immediately, and construction activities be stopped within a radius of at least 10m of such indicator. The area should then be demarcated by a danger tape. Accordingly, a professional archaeologist or PHRAG officer should be contacted immediately. In the meantime, it is the responsibility of the environmental officer and the contractor to protect the site from publicity (i.e., media) until a mutual agreement is reached. It is mandatory to report any incident of human remains encountered to the South African Police Services, PHRAG staff member and professional archaeologist. Any measure to cover up the suspected archaeological material or to collect any resources is illegal and punishable by law under Section 35(4) and 36(3) of the National Heritage Resources Act, Act 25 of 1999. The developer should induct field worker about archaeology, and steps that should be taken in the case of exposing archaeological materials.

As per the recommendations above, there are no major heritage reasons why the proposed development could not be allowed to proceed. Thus, it is recommended that the proposed development proceed on condition that the recommendation indicated above are adhered to. The following conditions of authorisation as highlighted in this report must be strictly adhered to:

- **Implementation of a Chance Find Procedure during construction**.

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ABBREVIATIONS

AIA	Archaeological Impact Assessment
EMP	Environmental Management Plan
HIA	Heritage Impact Assessment
LIA	Late Iron Age
MIA	Middle Iron Age
EIA	Early Iron Age
HMP	Heritage Management Plan
LSA	Late Stone Age
MSA	Middle Stone Age
ESA	Early Stone Age
NASA	National Archives of South Africa
NHRA	National Heritage Resources Act
PHRAG	Provincial Heritage Resources Authority Gauteng
SAHRA	South African Heritage Resources Agency

GLOSSARY OF TERMS

The following terms used in this Archaeology are defined in the National Heritage Resources Act [NHRA], Act No. 25 of 1999, South African Heritage Resources Agency [SAHRA] Policies, as well as the Australia ICOMOS Charter *(Burra Charter)*:

Archaeological Material: remains resulting from human activities, which are in a state of disuse and are in, or on, land and which are older than 100 years, including artifacts, human and hominid remains, and artificial features and structures.

Artefact: Any movable object that has been used, modified, or manufactured by humans.

Conservation: All the processes of looking after a site/heritage place or landscape including maintenance, preservation, restoration, reconstruction and adaptation.

Cultural Heritage Resources: refers to physical cultural properties such as archaeological sites, palaeolontological sites, historic and prehistorical places, buildings, structures and material remains, cultural sites such as places of rituals, burial sites or graves and their associated materials, geological or natural features of cultural importance or scientific significance. This include intangible resources such religion practices, ritual ceremonies, oral histories, memories indigenous knowledge.

Cultural landscape: "the combined works of nature and man" and demonstrate "the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both internal and external".

Cultural Resources Management (CRM): the conservation of cultural heritage resources, management, and sustainable utilisation and present for present and for the future generations

Cultural Significance: is the aesthetic, historical, scientific and social value for past, present and future generations.

Chance Finds: means Archaeological artefacts, features, structures or historical cultural remains such as human burials that are found accidentally in context previously not identified during

cultural heritage scoping, screening and assessment studies. Such finds are usually found during earth moving activities such as water pipeline trench excavations.

Compatible use: means a use, which respects the cultural significance of a place. Such a use involves no, or minimal, impact on cultural significance.

Conservation means all the processes of looking after a place so as to retain its cultural significance.

Expansion: means the modification, extension, alteration or upgrading of a facility, structure or infrastructure at which an activity takes place in such a manner that the capacity of the facility or the footprint of the activity is increased.

Grave: A place of interment (variably referred to as burial), including the contents, headstone or other marker of such a place, and any other structure on or associated with such place.

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, plan, programme or policy which requires authorisation of permission by law and which may significantly affect the cultural and natural heritage resources. The HIA includes recommendations for appropriate mitigation measures for minimising or avoiding negative impacts, measures enhancing the positive aspects of the proposal and heritage management and monitoring measures.

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

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

***In situ* material:** means material culture and surrounding deposits in their original location and context, for instance archaeological remains that have not been disturbed.

Interested and affected parties Individuals: communities or groups, other than the proponent or the authorities, whose interests may be positively or negatively affected by the proposal or activity and/ or who are concerned with a proposal or activity and its consequences.

Interpretation: means all the ways of presenting the cultural significance of a place.

Late Iron Age: this period is associated with the development of complex societies and state systems in southern Africa.

Material culture means buildings, structure, features, tools and other artefacts that constitute the remains from past societies.

Mitigate: The implementation of practical measures to reduce adverse impacts or enhance beneficial impacts of an action.

Place: means site, area, land, landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.

Protected area: means those protected areas contemplated in section 9 of the NEMPAA and the core area of a biosphere reserve and shall include their buffers.

Public participation process: A process of involving the public in order to identify issues and concerns, and obtain feedback on options and impacts associated with a proposed project, programme or development. Public Participation Process in terms of NEMA refers to: a process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to specific matters.

Setting: means the area around a place, which may include the visual catchment.

Significance: can be differentiated into impact magnitude and impact significance. Impact magnitude is the measurable change (i.e. intensity, duration and likelihood). Impact significance is the value placed on the change by different affected parties (i.e. level of significance and acceptability). It is an anthropocentric concept, which makes use of value judgments and science-based criteria (i.e. biophysical, physical cultural, social and economic).

Site: a spatial cluster of artefacts, structures, and organic and environmental remains, as residues of past human activity.

1. Introduction

Vhubvo Consultancy Cc was requested to conduct Archaeological and Heritage Impact Assessment study for the proposed construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M, within the jurisdiction of the City of Tshwane Metropolitan Municipality, Gauteng Province. The study aims are to outline the archaeological sites, cultural resources, sites associated with oral histories, graves, cultural landscapes, and any structure of historical significance that may be affected by the proposed development and to advise on mitigation measures should any be affected and these will, in turn, assist the developer in planning on the most appropriate options in line with the National Heritage Resource Act (NHRA), 1999 (Act 25 of 1999). According to Section 38 (1) of the NHRA, an Impact Assessment is undertaken in case where a listed activity is triggered. Such activities include:

(a) the construction of a linear development exceeding 300m in length;
(b) the construction of a bridge exceeding 50 m in length; and
(c) any development or other activity which will change the character of an area of land, or water -
    (i) exceeding 5 000 m^2 in extent;
    (ii) involving three or more existing erven or subdivisions thereof; or
    (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
    (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a Provincial Heritage Resources Authority;
(d) the re-zoning of a site exceeding 10 000 m2 in extent; or
(e) any other category of development provided for in regulations by SAHRA or PHRA.

The proposal triggered the conduction of an impact Assessment because it **exceeds 300m in extent**. The findings of this Assessment have been informed by desktop studies and field surveys. The desktop study was undertaken through SAHRIS for previous Cultural Heritage Impact Assessments conducted in the region of the proposed development, and for research that have been carried out in the area over the past years. The survey was conducted in accordance with the SAHRA Minimum Standards for Archaeology and Paleontology. The minimum standards specify the required contents of this report. The management and protection of heritage resources is a requirement of the National Environmental Management Act No.107 of 1998 (NEMA) as amended in terms of the NEMA 2010 regulations and Section 38 of the National Heritage Resources Act (NHRA - Act No. 25 of 1999). The purpose of the HIA procedures is to identify and describe the following:

- Description of the activity and its location;
- Description of affected environment;
- Identify heritage sites;
- Identify archaeological sites;
- Determine whether the heritage or archaeological remains will be affected by the proposed development;
- Methods used to assess risk;
- Summary of heritage risk assessment; and
- Mitigation and/or precautionary measures.

The purpose of the report is to inform the applicant/client about the heritage resources and their significance, while making appropriate recommendations regarding the management thereof. It is also essential in that it provides Provincial Heritage Resources Authority Gauteng (PHRAG) with the necessary information to make an informed decision regarding the following:

- Whether it has objections with regard to the development;
- The conditions upon which such developments might proceed;
- The sites to which permits for destruction is required;
- Whether the sites require mitigation and what it should comprise of; and
- The measures that should/can be put in place to protect sites that should be conserved.

2. Site Location and Description

The proposed construction of Student Accommodation and Associated Infrastructure site is located within the Soshanguve township, situated in the north-western section of the City of Tshwane metropolitan municipality. The area is characterized by rocks and a ridge occupying huge central section of the site, fair concentration of trees and shrubs including scattered solid waste, unmanaged vegetation, and unregulated land use adjacent to residential properties. As illustrated in Figure 5, the area forms part of a residential settlement. No heritage resources were identified during the field survey, and the site does not display any features of cultural or historical significance. Environmental observations, as shown in *Figure 6-8*, indicate areas of unmanaged vegetation and land pollution and informal land use. Although no surface-level heritage resources were discovered, the environmental degradation and previous ground disturbances may have implications for the presence of subsurface archaeological or cultural material. These altered conditions reduce the likelihood of encountering intact heritage resources, though caution is still advised in later phases of development.

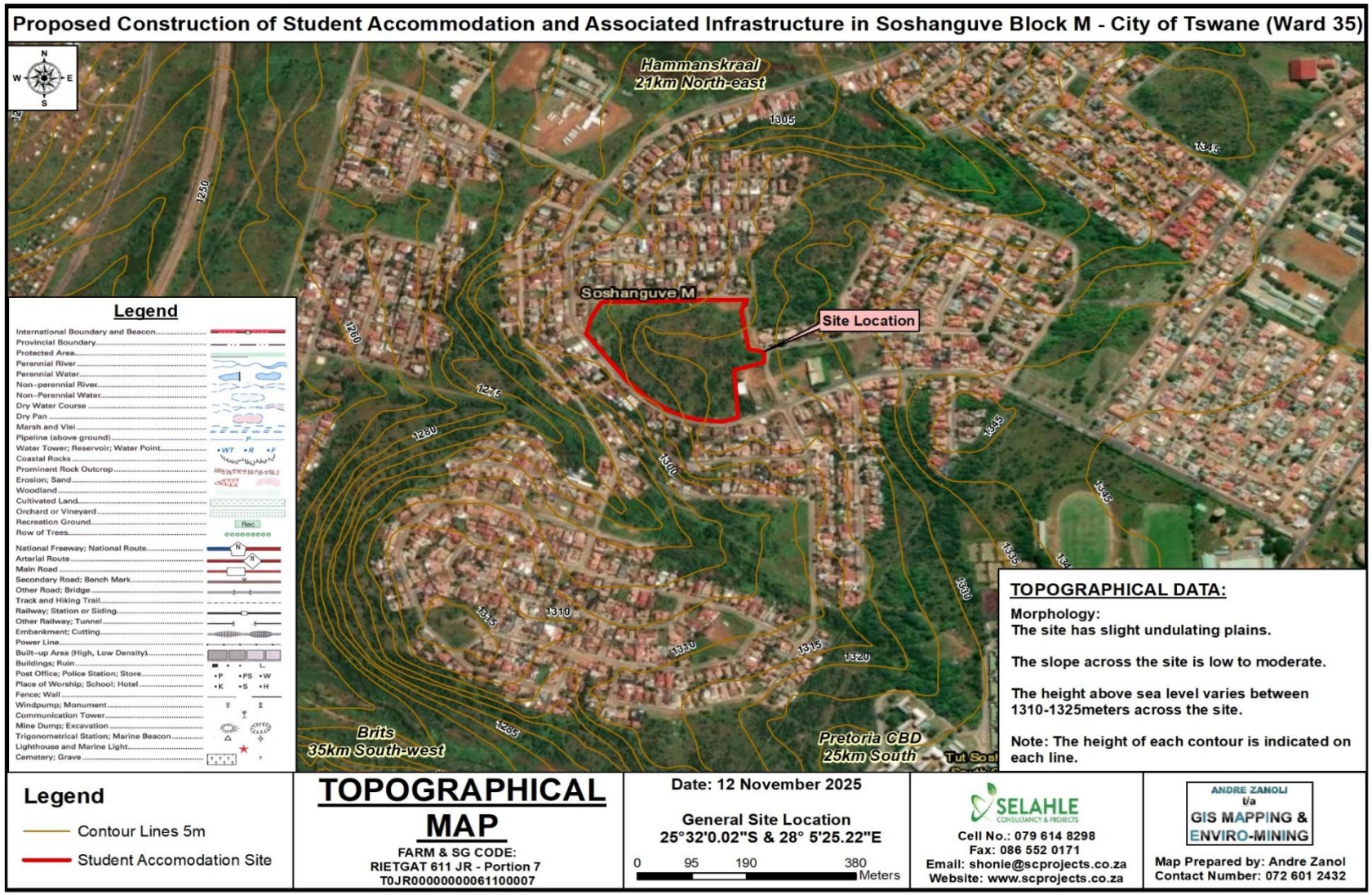

Figure 1: View of the topographical Map of the proposed area of study.

Figure 2: An overview of the study area.

Figure 3: General view of the southern section of the site.

Figure 4: View of section of the area proposed for construction with concentration of rocks.

Figure 5: View of section of the proposal overlooking the nearby residential development.

Figure 6: View of section of the site which is disturbed by previous construction activities.

Figure 7: View of an informal dumping site identified on the site.

Figure 8: View of some of the structure noted on site.

3. Nature of the Proposed Project

The proposal involves the construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M, with a capacity of approximately 2000 bed Student Accommodation.

4. Methodology and Approach

4.1 Background study introduction

The methodological approach is informed by the 2012 SAHRA Policy Guidelines for impact assessment. As part of this study, the following tasks were conducted:

1) Literature review;

2) Consultations with community members;

3) Completion of a field survey; and

4) Documentations and analysis of the acquired data, leading to the production of this report.

4.1.1 Literature Review

The desktop study was undertaken through SAHRIS for previous Cultural Heritage Impact Assessments conducted in the region of the proposed development, and also for research that

have been carried out in the area over the past years, as well as historical aerial maps located in the Deeds Office. These literatures were used to screen the proposed area and to understand the baseline of heritage sensitivities.

4.1.2 Oral interview

Oral interview was initiated with Community members, this aimed to understand the cultural landscapes and/ or intangible heritage of the area.

4.1.3 Physical survey

The field survey was undertaken on the 18th of July 2025. An archaeologist from Vhubvo conducted the survey.

4.1.4 Documentation

The general project area was documented. This documentation included taking photographs using cameras a 10.1 mega-pixel Sony Cybershort Digital Camera. Plotting of finds was done by a Garmin etrex Venture HC.

4.2 Restrictions and Assumptions

Some portions of the proposed development area are disturbed by human activities. However, the assessment was completed successful and adequate information were captured to successful complete the report. It is important to note that this assessment was only limited to cultural heritage assessment and did not include any form of subsurface analysis. As with any survey, archaeological materials may be under the surface and therefore unidentifiable to the surveyor and may be exposed during the course of construction. As a result, should any archaeological/ or grave site be observed during construction stage, a heritage specialist monitoring the development/ and or SAHRA official must immediately be notified. It is the responsibility of the contractor to protect the site from publicity (i.e., media) until all assessments are made. There are several impact assessments conducted around the proposed area. These studies are important in assuming the sites that may be found in the area. Some of these studies are the following:

- Coetzee F, P. (2020) Cultural Heritage Impact Assessment: Phase 1 Investigation for the proposed demolition of redundant portions of the PPC Hercules Cement Factory, City of Tshwane Metropolitan Municipality, Gauteng Province. P.O. Box 731504, Fairland, 2030.
- Mathoho, N, E. (2018) Phase 1 Archaeological Impact Assessment relating to the proposed Soshanguve SS Extension 7 and 8 Township Establishment within the City of Tshwane Metropolitan Municipality, Gauteng Province.

- Marais, L. (2022) Phase 1 Heritage Impact Assessment (HIA) for the establishment of a new cemetery and proposed access road, Ga-Rankuwa, Gauteng Province. 868 Endeman Street, Wonderboom South, Pretoria.
- Matenga, E. (2024) Heritage Impact Assessment for the construction of a 7 km 132kV double circuit loop-in, loop-out line from the existing Pelly–Temba main 132kV line to the proposed Kekana Substation close to Hammanskraal, Gauteng Province. Archaeological and Heritage Services Africa (Pty) Ltd (AHSA). Reg. No. 2016/281687/07.
- Pelser, A.J. (2025) A Phase 1 Heritage Impact Assessment and Report for the proposed Rethabiseng–Cullinan PV 132kV OHL and Switching Station east of Cullinan in the City of Tshwane Metropolitan Municipality, Gauteng Province and directly south and west of Ekangala in Thembisile Hani Local Municipality, Mpumalanga Province. Report No. APAC025/44. Setala Environmental, Pretoria. Amended May 2025.
- Pistorius, J.C.C. (n.d.) Draft Phase 1 Heritage Impact Assessment Study for the Eskom Tshwane Strengthening Project Phase 1 in Pretoria (Tshwane), Gauteng Province: Apollo–Verwoerdburg Substation Upgrade and 400kV Turn-In Power Lines. Volume 2 Report, EIA Ref No: 12/12/20/1470. Prepared for Savannah Environmental (Pty) Ltd and Eskom Transmission.

5. Applicable Heritage Legislation

Several legislations provide the legal basis for the protection and preservation of both cultural and natural resources. These include the National Environment Management Act (No. 107 of 1998); Mineral Amendment Act (No 103 of 1993); Tourism Act (No. 72 of 1993); Cultural Institution Act (No. 119 of 1998), and the National Heritage Resources Act (Act 25 of 1999). Section 38 (1) of the National Heritage Resources Act requires that where relevant, an Impact Assessment is undertaken in case where a listed activity is triggered. Such activities include:

(a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
(b) the construction of a bridge or similar structure exceeding 50 m in length; and
(c) any development or other activity which will change the character of an area of land, or water -
(i) exceeding 5 000 m² in extent;
(ii) involving three or more existing erven or subdivisions thereof; or
(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a Provincial Heritage Resources Authority;
(d) the re-zoning of a site exceeding 10 000 m2 in extent; or

(e) any other category of development provided for in regulations by SAHRA or a Provincial Heritage Resources Authority, 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 3 of the National Heritage Resources Act (25 of 1999) lists a wide range of national resources protected under the act as they are deemed to be national estate. When conducting Heritage Impact Assessment (HIA) the following heritage resources have to be identified:

(a) Places, buildings structures and equipment of cultural significance
(b) Places to which oral traditions are attached or which are associated with living heritage
(c) Historical settlements and townscapes
(d) Landscapes and natural features of cultural significance
(e) Geological sites of scientific or cultural importance
(f) Archaeological and paleontological sites
(g) Graves and burial grounds including-
- *(i) ancestral graves*
- *(ii) royal graves and graves of traditional leaders*
- *(iii) graves of victims of conflict*
- *(iv) graves of individuals designated by the Minister by notice in the Gazette*
- *(v) historical graves and cemeteries; and*
- *(vi) other human remains which are not covered by in terms of the Human Tissue Act,1983 (Act No. 65 of 1983)*

(h) Sites of significance relating to the history of slavery in South Africa
(i) moveable objects, including -
- *(i) objects recovered from the soil or waters of South Africa, including archaeological and paleontological objects and material, meteorites and rare geological specimens*
- *(ii) objects to which oral traditions are attached or which are associated with living heritage*
- *(iii) ethnographic art and objects*
- *(iv) military objects*
- *(v) objects of decorative or fine art*
- *(vi) objects of scientific or technological interest; and*
- *(vii) books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1 of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996).*

Other sections of the Act with a direct relevance to the AIA are the following:

Section 34(1) *No person may alter or demolish any structure or part of a structure, which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.*

Section 35(4) *No person may, without a permit issued by the responsible heritage resources authority:*

- *destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite*

Section 36 (3) *No person may, without a permit issued by SAHRA or a provincial heritage resources authority:*

- *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 formal cemetery administered by a local authority; or*
- *bring onto or use at a burial ground or grave any excavation equipment, or any equipment which assists in detection or recovery of metals.*

6. Discussion of (Pre-) History of the Area

The proposed study area for development is situated in Soshanguve, a township in the North of Pretoria, within the jurisdiction of City of Tshwane Municipality, Gauteng province. In the region there is a documented presence of Stone Age hunter-gatherers, Iron Age farming communities, and more recent historical developments, including colonial and apartheid-era settlement. While the Stone Age sites are less abundant within Soshanguve, the broader Gauteng region is rich in archaeological sites, particularly around the Cradle of Humankind. The archaeology of the province can therefore be divided into Stone Age, Iron Age, and Historical periods, with each period represented within the wider regional context.

The Early Stone Age (ESA)

Evidence indicates that Early Stone Age (ESA) activity, dating from about 2 million to more than 200 000 years ago, is represented at several sites within the Cradle of Humankind World Heritage Area. At sites such as Sterkfontein and Kromdraai, both Oldowan and Acheulian industries are well documented. The earliest tools were simple implements used for chopping, butchering, and breaking bones. Cut marks on faunal remains suggest that early hominins often scavenged carcasses rather than hunting directly (Esteyhuysen, 2007; Wadley, 2007). Acheulian handaxes and cleavers, which emerged over 1.5 million years ago, are widespread across river valleys and dolomitic landscapes. These tools show remarkable consistency in form, reflecting deliberate technological choices (Sharon, 2009). Fossil-bearing cave sites such as Sterkfontein and Makapansgat also provide direct evidence of tool-making hominins, likely early Homo species (Esteyhuysen, 2007).

The Middle Stone Age (MSA)

The Middle Stone Age (MSA) deposits date from around 300 000 to 20 000 years ago and are commonly found in caves and rock shelters as well as on river terracess. These MSA assemblages are characterized by blades, points, scrapers, and flakes, reflecting advanced knapping techniques. Therefore, the technology indicates a shift toward smaller, more specialized tools compared to the ESA. Residue analysis shows points were used as spearheads and evidence for hunting medium sized game (Wadley, 2007). Thus, research has highlighted that the MSA coincides with the

emergence of modern humans and new symbolic behaviour such as art and symbolism (Thompson & Marean, 2008). Surface scatters of MSA artifacts are recorded throughout Gauteng, though often in secondary contexts without faunal or botanical remains. Nonetheless, MSA industries are significant for understanding human behavioral evolution in the province.

The Later Stone Age (LSA)

The Later Stone Age (LSA) sites, dating from about 40 000 to 2 000 years ago, are well represented, particularly in rock shelters where preservation conditions are favorable. These sites preserve not only microlithic stone tools but also organic remains, including hearths, beads made of ostrich eggshell, bone implements, and occasional bedding material. The LSA is also closely associated with San rock art traditions. Rock shelters across the province, including those in the Magaliesberg and surrounding areas, contain polychrome paintings depicting symbolic and ritual activities. Open-air LSA sites are also recorded, though they usually preserve only stone tool scatters.

The Iron Age

Iron Age settlement began with the movement of agro-pastoralist communities into the interior of southern Africa after AD 200.Early and Middle Iron Age sites are scarce, but Late Iron Age (LIA) occupation is well documented. Stone walled settlements from the 16th to 18th centuries are scattered across the province, especially in the northern parts near Pretoria and the Bronkhorstspruit/Cullinan area (Bergh, 1999; Pelser, 2018). These stone walled sites, associated with ancestral Tswana, Pedi and Ndebele groups, reflect a move towards hilltop settlements with defensive enclosures, a response to socio-political tensions during the later Iron Age. Moloko pottery is widely associated with LIA sites and linked to Sotho-Tswana identities (Huffman, 2007). Many of these communities were affected by the Difaqane/Mfecane in the late 18th and early 19th centuries which reshaped the settlement history of the province.

Historical Period

The broader region in which Soshanguve is located forms part of the historical landscape of Pretoria and the northern Transvaal. During the 19th century, this area was occupied by different communities, including Tswana-speaking groups, who practiced mixed farming and maintained local chiefdoms. Oral traditions and historical records indicate that these communities were later affected by the movement of people during the Difaqane/Mfecane period (early 1800s), which reshaped settlement patterns across the interior (Delius, 1983). By the mid-1800s, with the arrival of Voortrekker settlers, land in and around the Pretoria area was increasingly brought under

colonial control. Following the establishment of the Zuid-Afrikaansche Republiek (ZAR) in 1852, land allocation policies and later colonial administration altered indigenous land use systems and facilitated the displacement of African communities (Carruthers, 1990). In the late 19th and early 20th centuries the discovery of gold in the Witwatersrand and Pretoria's development as an administrative capital led to massive migration and settlement in the surrounding areas. African labour became essential to urban industries and farms and the 1913 and 1936 Land Acts confined Black people to designated reserves and "locations" (Dubow, 1989). The forced removals that created Soshanguve in the 1970s must be seen in this longer history of colonial dispossession and segregation where patterns of land alienation, racial separation and labour exploitation defined the colonial and historical period.

7. Degree of Significance

This category requires a broad, but detailed knowledge of the various disciplines that might be involved. It must be borne in mind that the significance of a site from an archaeological perspective does not necessarily depend on the size of the site but more on the uniqueness of the site within a region. The following table is used to grade heritage resources.

Table 2: Grading system for identified heritage resources in terms of the National Heritage Resources Act (Act 25 of 1999).

Level	Significance	Possible action
National (Grade I)	Site of National Value	Nominated to be declared by SAHRA
Provincial (Grade II)	Site of Provincial Value	Nominated to be declared by PHRA
Local Grade (IIIA)	Site of High Value Locally	Retained as heritage
Local Grade (IIIB)	Site of High Value Locally	Mitigated and part retained as heritage
General Protected Area A	Site of High to Medium	Mitigation necessary before destruction
General Protected Area B	Medium Value	Recording before destruction
General Protected Area C	Low Value	No action required before destruction

Significance rating of sites

(i) High (ii) Medium (iii) Low

These categories relate to the actual artefact or site in terms of its actual value as it is found today, and refers more specifically to the condition that the item is in. For example, an archaeological site may be the only one of its kind in the region, and will thus be considered to be of high regional significance, however; should there be heavy erosion of the greater part of the site, its significance rating would be medium to low. The following are guidelines for the nature of the mitigation that must take place as Phase 2 of the project.

High

This is a 'do not touch' situation, alternative must be sought for the project, examples would be natural and cultural landscapes like the Mapungubwe Cultural Landscape World Heritage Site, or the house in which John Langalibalele resided.

Certain sites, or features may be exceptionally important, but do not warrant leaving entirely alone. In such cases, detailed mapping of the site and all its features is imperative, as is the collection of diagnostic artefactual material on the surface of the site. Extensive excavations must be done to retrieve as much information as possible before destruction. Such excavations might cover more than half the site and would be mandatory; it would also be advisable to negotiate with the client to see what mutual agreement in writing could be reached, whereby part of the site is left for future research.

Medium

Sites of medium significance require detailed mapping of all the features and the collection of diagnostic artefactual material from the surface of the site. A series of test trenches and test pits should be excavated to retrieve basic information before destruction.

Low

These sites require minimum or no mitigation. Minimum mitigation recommended could be a collection of all surface materials and/ or detailed site mapping and documentation. No excavations would be considered to be necessary.

In all the above scenarios, permits will be required from the South African Heritage Resources Agency (SAHRA) or the appropriate PHRA as per the legislation (the National Heritage Resources Act, no. 25 of 1999). Destruction of any heritage site may only take place when the appropriate heritage authority has issued a permit. The following table is used to determine rating system on the receiving environment.

Table 3: Rating and evaluating criteria of impact

The Status of The Impact
The impacts are assessed as either having a: negative effect (i.e., at a `cost' to the environment), positive effect (i.e., a `benefit' to the environment), or Neutral effect on the environment
Extent of the Impact (1) Site (site only), (2) Local (site boundary and immediate surrounds), (3) Regional (within the three local municipalities), (4) National, or (5) International.
Duration of the Impact The length that the impact will last for is described as either: (1) Immediate (<1 year) (2) Short term (1-5 years), (3) Medium term (5-15 years), (4) Long term (ceases after the operational life span of the project), (5) Permanent.
Magnitude of the Impact The intensity or severity of the impacts is indicated as either: (0) None, (2) Minor, (4) Low, (6) Moderate (environmental functions altered but continue), (8) High (environmental functions temporarily cease), or (10) Very high / Unsure (environmental functions permanently cease).
Probability of Occurrence The likelihood of the impact actually occurring is indicated as either: (0) None (the impact will not occur), (1) Improbable (probability very low due to design or experience) (2) Low probability (unlikely to occur),
Reversibility The degree to which an impact is reversible:

(1) Completely reversible
(2) Partly reversible
(3) Barely reversible
(4) Irreversible

8. Findings and Discussions

The main aim of the survey was to evaluate potential heritage resources that would occur within the boundaries of the proposed area (s), as well as to determine if there is any hamartia that may prevent the proposed development. The Phase I Archaeological and Cultural Heritage Impact Assessment for the proposed construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M, did not yield any significant heritage resources within the footprint of the surveyed area.

8.1 Impact Assessment

Below is a description of the project area, as well as related impact ratings. These ratings are for archaeological and cultural heritage sites known to exist in the proposed area, and includes Stone and Iron Age, as well as Historical era materials. Note that these impacts are assessed as per Table 2. Some portions of the proposed development area are disturbed by human activities.

Construction Phase

The construction phase will involve the removal of topsoil and vegetation as well as establishment of infrastructure. These activities will have a negative and irreversible impact on the landscape. Impacts include destruction or partial destruction of the area, and this may accidentally unearth archaeological materials.

Operation Phase

No impacts are expected during the operation phase.

Decommissioning Phase

No impacts are expected during the decommissioning phase.

Table 4: Anticipating impact rating on Stone, Iron and Historical age.

Issue	Corrective Measures	Impact Rating Criteria					Significance
		Nature	Extent	Duration	Magnitude	Probability	
Archaeology	No	Negative	1	2	4	2	Low
	Yes	Negative	1	2	4	2	Low
Corrective Actions	• Should any archaeological material be discovered accidentally during the construction phase, PHRAG should be alerted immediately, and construction activities be stopped within a radius of at least 10m of such indicator; and • Prior to construction, contractors should be given training on how to identify and protect archaeological remains that may be discovered during construction						

9. Recommendations

No archaeological materials were observed during the survey. The client is however reminded that most archaeological materials are normally found underground, as such should any archaeological material be unearthed accidentally during construction, the Provincial Heritage Resources Authority Gauteng should be alerted immediately, and construction activities be stopped within a radius of at least 10m of such indicator. The area should then be demarcated by a danger tape. Accordingly, a professional archaeologist or PHRAG officer should be contacted immediately. In the meantime, it is the responsibility of the Environmental officer and the contractor to protect the site from publicity (i.e., media) until a mutual agreement is reached. It is mandatory to report any incident of human remains encountered to the South African Police Services, PHRAG staff member and professional archaeologist. Any measure to cover up the suspected archaeological material or to collect any resources is illegal and punishable by law under Section 35(4) and 36(3) of the National Heritage Resources Act, Act 25 of 1999. The developer should induct field worker about archaeology, and steps that should be taken in the case of exposing archaeological materials.

Pre-construction education and awareness training:

Prior to construction, contractors should be given training on how to identify and protect archaeological remains that may be discovered during the project. The pre-construction training should include some limited site recognition training for the types of archaeological sites that may occur in the construction areas. Below are some of the indicators of archaeological site that may be found during construction:

- ❖ Flaked stone tools, bone tools and loose pieces of flaked stone;
- ❖ Ash and charcoal;

- Bones and shell fragments;
- Artefacts (e.g., beads or hearths);
- Packed stones which might be uncounted underground, and might indicate a grave or collapse stone walling.

10. Conclusions

A thorough background study and survey of the proposed construction of Student Accommodation and Associated Infrastructure in Soshanguve Block M, within the jurisdiction of the City of Tshwane Metropolitan Municipality, Gauteng Province was conducted in line with SAHRA guidelines. As per the recommendations above, there are no major heritage reasons why the proposed development could not be allowed to proceed. Thus, it is recommended that the proposed development proceed on condition that the above recommendations are adhered to. The following conditions of authorisation as highlighted in this report must be strictly adhered to:

- Implementation of a Chance Find Procedure during construction.

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Data bases

Chief Surveyor General

Environmental Potential Atlas, Department of Environmental Affairs and Tourism. Heritage Atlas Database, Pretoria.

National Archives of South Africa

Appendix 1: Site Significance

The following guidelines for determining site *significance* were developed by SAHRA in 2003. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these.

(a) Historic value

- Is it important in the community, or pattern of history?
- Does it have strong or special association with the life or work of a person, group or organization of importance in history?
- Does it have significance relating to the history of slavery?

(b) Aesthetic value

- Is it important in exhibiting particular aesthetic characteristics valued by a community or cultural group?

(c) Scientific value

- Does it have potential to yield information that will contribute to an understanding of natural or cultural heritage?
- Is it important in demonstrating a high degree of creative or technical achievement at a particular period?

(d) Social value

- Does it have strong or special association with a particular community or cultural group for social, cultural or spiritual reasons?

(e) Rarity

- Does it possess uncommon, rare or endangered aspects of natural or cultural heritage?

(f) Representivity

- Is it important in demonstrating the principal characteristics of a particular class of natural or cultural places or objects?
- What is the importance in demonstrating the principal characteristics of a range of landscapes or environments, the attributes of which identify it as being characteristic of its class?
- Is it important in demonstrating the principal characteristics of human activities (including way of life, philosophy, custom, process, land-use, function, design or technique) in the environment of the nation, province, region or locality?

Appendix II: Chance Find Procedure

Introduction

The purpose of this document is to provide Selahle Consultancy and Projects and the contractors with the appropriate response guidelines (extracted and adapted from the National Heritage Resources Act (Act No. 25 of 1999) Regulations Reg No. 6820, GN: 548, taking into consideration international best practice based on World Bank, Equator Principles and the International Finance Corporation Performance Standards, 1972 UNESCO Convention on the Protection of World Cultural and Natural Heritage (World Heritage Convention), that should be implemented in the event of chance discovery of heritage resources. These guidelines or chance find procedures (CFPs) can be incorporated into Selahle Consultancy and Projects policies that may have relevance during construction and operational phases. The CFPs aim to avoid and/or reduce project risks that may result due to chance finds, whilst considering international best practice.

Purpose of ACFP

The aim of this Archaeological Chance Find Procedure (ACFP) are to protect previously unexposed heritage resources that are yet unknown although might be encountered during the project operation or construction phase. This document serves to provide best practices to manage accidental exposed heritage resource during the development. The procedures are given to the client/applicant/contracts in order to prevent and minimise negative impact on heritage resources encountered by accident. Thus, the heritage specialist(s) compiled this chance find document with a purpose to give instructions based on relevant and appropriate actions in line with the NHRA and best guidelines to protect the chance finds on the proposed site. In significant, the ACFP stand in place to promote the preservation of heritage resources and present mitigation measure to avoid disturbance on heritage resources.

ACFP for Heritage Resources

The following procedures must be followed when heritage resources are encountered during the operational or construction phase:

- All construction/clearance activities in the vicinity of the heritage resources found by accident on site must cease immediately to avoid further damage to the chance finds
- Immediately report the chance finds to the supervisor/site manager or if they are unavailable, report to the project Environmental Officer (EO) who will provide further instructions.

- Record (note taking, photograph with a scale, GPS coordinates) of all the chance find exposed during the activity.
- All remains are to be stabilised in situ.
- Secure (e.g., barricade) the area to prevent further disturbance on heritage resources.
- The EO must contact the qualified archaeologist registered with the association for Association for Southern African Professional Archaeologist (ASAPA) or Provincial Heritage Resources Authority Gauteng.
- The project archaeologist will conduct the inspection and assess the significance of the chance finds under SAHRA guidelines, give recommendation and mitigation measures.