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Development Heritage Management Plan Guidelines

for Archaeological, Palaeontological and Meteorites Heritage Resources

1. Introduction

Heritage or Conservation Management Plans (HMPs/CMPs) are vital tools that provide an opportunity to conserve and manage heritage resources for future generations to enjoy. However, most of these HMPs/CMPs are developed specifically for site conservation for tourism or research purposes. Considering the number of large-scale mining, wind and solar operations, for example, there is an evident need for effective HMPs/CMPs within the context of developments. These developments have the potential to have a significant impact on vast areas and innumerable heritage resources within their development footprints and impact areas. The management of heritage resources within an area outlined for development requires a different approach to the current HMPs/CMPs. CMPs/HMPs aim to conserve heritage resources, while Development Heritage Management Plans (DHMPs) aim to manage and monitor the activities at certain phases of a development that may impact heritage resources within the application area.

Very few DHMPs that are submitted for developments conform to the stipulations set out in the National Environmental Management Act, Act 107 of 1998 (NEMA) Environmental Impact Assessment (EIA) 2017 Regulations. This makes them very challenging to implement and results in problems with regards to reporting and auditing by independent consultants as part of the Environmental Authorisation conditions to the Competent Authority. While these DHMPs are written as part of a NEMA process, the DHMPs must still be submitted to the relevant Heritage Resources Authority (HRA) for comment and approval and revisions imposed by the HRAs' must be incorporated.

DHMPs can also be influenced by international guidelines and standards such as the UNESCO HMP Guidelines, International Finance Corporation (IFC) Performance Standards 7 and 8, and the International Council on Monument and Sites (ICOMOS) Charters that detail the protection and management of various types of heritage. While the specific details of these guidelines and standards do not need to be included in all DHMPs, reference must be made to the overarching principles.



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2. Current guidelines and NEMA Requirements

The 2006 SAHRA Site Management Plan (SMP) Guidelines list the following steps for the development of these plans:

1. A team must be formed to compile the CMP. This team can include specialists from various fields, managers and legal advisors. Relevant stakeholders must be informed and partnerships should be formed;
2. Information must be gathered about the heritage site, both tangible and intangible information. A condition survey of the site must be conducted to establish the status quo;
3. Cultural significance of the site must be determined and key issues identified. A SWOT analysis¹ must be conducted and additional stakeholders meetings must be organised to discuss gathered data;
4. Objectives, strategies, an action and a management plan must be developed, including a monitoring and evaluation strategy; and
5. The CMP must be implemented and resources to implement the plan must be identified and allocated, including the responsible authorities. The CMP must be announced to the public and all communication must be recorded.

The EMPr (as per NEMA EIA 2017 Regulations) must, *inter alia*, include the following:

- A map which superimposes the proposed activities and associated infrastructure on environmental sensitivity areas of the preferred development site, indicating any areas that should be avoided, including buffer zones;
- A description of the impact management outcomes, impacts and risks that need to be avoided must be identified, managed or mitigated throughout the EIA process for all phases of development;
- A description of proposed impact management actions, identifying the manner in which the impact management objectives and outcomes will be achieved, including action to avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
- The method and frequency of monitoring of the implementation of impact management actions;

¹ A SWOT analysis comprises an analysis of **S**trengths, **W**eaknesses, **O**pportunities and **T**hreats associated with the element in question



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- An indication of the persons who will be responsible for the implementation of the impact management actions;
- A mechanism for monitoring compliance with the impact management actions;
- A programme for reporting on compliance taking into account the requirements as prescribed by the Regulations;
- An environmental awareness programme and any specific information that may be required by the competent authority.

3. Proposed SAHRA DHMP Guidelines

These proposed guidelines only pertain to development applications under the jurisdiction of SAHRA and are only applicable to archaeological, palaeontological and meteorite resources as defined in section 2(ii), and 2(xxv) and 2(xxxi) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

The above noted SMP guidelines and NEMA requirements should be considered during the development of a DHMP. While application in terms of section 38(1) of the NHRA will not need to conform to the NEMA EMPr requirements, it is advised that these guidelines are used as a guide for the development of a DHMP.

According to the current 2007 SAHRA Minimum Standards for Archaeological and Palaeontological Components of Impact Assessment Reports, identified heritage resources with a significance rating of Field Rating IIIB and higher, require mitigation and must be retained (some identified resources in part). To ensure that identified resources are retained and conserved, the activities of the development and the impact of these activities throughout the various phases of the project must be managed.

These plans should include the following:

- Description of development including project details, locations, authorised activities, phases of development and the Environmental Authorisation (EA) conditions;
- SAHRA Comment/Decision;
- Legal framework;
- Objectives, impacts to heritage resources and potential risks to heritage resources;
- SWOT Analysis as referred to above;
- Outcomes and aim of DHMP;
- Actions to be followed per phase per activity;
- Procedure for compliance monitoring, timeframes and responsible individuals;



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- Description of heritage resources including significance, pictures, map of resources, mitigation and/or monitoring requirements;
- Monitoring and reporting procedures;
- Indication of budget required and the willingness/ability to implement DHMP; and
- Close out plan once decommissioning takes place.

When a specialist is tasked with providing input into a NEMA EMP, instead of a separate report, only the sections above that pertain to heritage need to be provided by the heritage specialist.

Additionally, mitigation measures provided by other specialist studies may result in secondary impacts to heritage resources. A good example of this is alien vegetation management plans. These plans usually include the systematic removal of alien vegetation from a development footprint. Uprooting alien vegetation within heritage resources may destroy sensitive stratigraphy, features and specimens. Another example of other specialist mitigation measures that may impact heritage includes stormwater management plans that aim to protect sensitive water bodies from potentially hazardous run-off and erosion. If not designed with an understanding that heritage resources are part of the landscape, the stormwater infrastructure such as berms and gabions may direct hazardous run-off into heritage resources, contaminating the soil and cause erosion.

4. Conclusion

The DHMP must aim to conserve heritage resources that will remain *in situ* within the development area and that will be impacted by long-term, cumulative impacts caused by the development activities in their various phases.

The DHMP must be submitted to SAHRA for comment and approval for implementation prior to the construction phase.

These guidelines do not aim to replace the 2006 Site Management Plan Guidelines, but serve as a separate guideline for developments.