



7 September 2017

Dear Ms. Natasha Higgitt

Heritage Officer

South African Heritage Resources Agency

RE: **Issues and response: HIA STUDY FOR THE PROPOSED CONSTRUCTION OF VISITOR ORIENTATION INFRASTRUCTURE AND CONSERVATION FACILITIES AND HOSTELS, MAPUNGUBWE CULTURAL LANDSCAPE WORLD HERITAGE SITE** by Shadreck Chirikure and Foreman Bandama

**Comment**

1. The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot accept the submitted HIA as it does not satisfy the requirements as per section 38(3) of the NHRA. The report does not make reference to pertinent documents and legislation such as the World Heritage Convention Act, the existing Site Management Plans, or the Park Management Plan.

**Response:** We produced a big document to cover ICOMOS requirements and the provisions of the NHRA Act. The World Heritage Act and the existing site management plans were mentioned in the document. For reasons to do with emphasis, we made them more prominent than before. There is now a new section reviewing the existing Park Management Plan.

2. SAHRA APM Unit conducted a site visit at Mapungubwe in October 2016, during which, it was noted that the proposed site of the office complex/conservation facility was already under construction without the prior submission of the HIA or an application in terms of

the NHRA to SAHRA. Additionally, the statement made in the HIA regarding the absence of heritage resources in the vicinity of the two proposed camping sites is incorrect. A SANDF bunker and associated structure and an old trading post/store is located within the proposed camping areas. A possible grave is located immediately adjacent to the Interpretive Centre parking lot near the proposed dormitory.

Response:

- i. Impact was assessed after development in the area for proposed conservation facilities

We were only appointed to perform the HIA after those developments that SAHRA mentions. However, the area has been affected by different activities including a football pitch, the nearby contractors house and access facilities to the aviation mast. Our recommendation is that there is need for a government department (Sanparks) to government department (SAHRA) engagement over this issue.

- ii. Incorrect statement about the presence of sites within the vicinity of the two proposed camping sites

The structures that SAHRA is mentioning are so big that anybody can see them. Indeed, we saw them and assessed them. Based on the comments raised by SAHRA, we included the sites and recommended that adequate measures be put in place to ensure that they are not damaged. Given the concept of adaptive re-use, the store could after detailed studies be repaired and re-opened for tourists. That facilities and heritage sites can co-exist is supported by the Mapungubwe Interpretation Centre which is built adjacent to the site of Hamilton. The site still has high levels of integrity and is very important for being a K2 kraal on a hilltop.

- iii. A possible grave is located immediately adjacent to the Interpretive Centre parking lot near the proposed dormitory.

We saw the structure but did not interpret it as a possible grave. As SAHRA suggests, this is a possibility and thus speaks to interpretation. During our assessment, we could not ascertain the date of the structure and whether it was recent or old. Under these circumstances caution is required but development is not going to cover this area. We included the recommendation that should any burials be found works must stop immediately.

3. The proposed development appears to trigger the National Environmental Management

Act, No. 107 of 1998 (NEMA) in terms of Regulation 544 Activity 27 and Regulation 545 Activities 5 and 6 as it will occur within a Declared Protected Area in terms of the National Environmental Management: Protected Areas Act, No 57 of 2003 (NEMPAA). This suggests that the proposed development should be subjected to an assessment in terms of Sections 19 and 20 of the NEMA 2014 Regulations (i.e. A Basic Assessment Report (BAR)). If this process is followed, SAHRA becomes a commenting authority in terms of the NEMA process, but a Competent Authority with regards to permit application for any work to be conducted within the declared National Heritage Site.

Response: We are aware of this but the idea is to produce a very strong document possible, informed by interactions with the Heritage Authority. So yes, we submitted the document to DEA but given that some individual sites in the core are National Heritage sites, it is important to satisfy fully the provisions of the NHRA Act. It is only when the assessment is deemed satisfactory by SAHRA that permit applications for individual sites will be made. A permit application will have coordinates, detailed maps and so on to guide the developer. So yes, permit applications will still come but after the HIA has met heritage requirements as per NHRA Act of 1999.

4. The following must be completed before further consideration of the proposed development by SAHRA can continue:

Consultation with the Department of Environmental Affairs (DEA) regarding a possible Environmental Authorisation Application for the project in terms of NEMA;

Response: Sanparks engaged with DEA and their preferred route is that we deal with SAHRA as per Section 38.

5. A revised HIA must be submitted to SAHRA (as part of the BAR or not) and must include the following:

A Palaeontological Impact Assessment (PIA) inclusive of a field assessment for the proposed development;

Response: The eastern Tuli Block on which Mapungubwe is situated is known to be fossil rich. However, fossils are associated with Permean rocks belonging to the Ecca group. About 15 to 20 meters of thick alluvium cover the surface in many areas including those along the Limpopo river. The Ecca deposits meanders away from Mapungubwe National Park. The belt starts in Nottingham Zimbabwe, and meanders away from Mapungubwe National Park to Venetia and into Botswana. Under these circumstances, a field paleontological assessment is not necessary. Chirikure is an archaeologist with training in geology and earth sciences and is competent in identifying materials of palaeontological

value.

A Visual Impact Assessment (VIA) on the proposed development, inclusive of photo montages showing the view shed of the proposed developments within the park;

Response: Photos were provided

6. Detailed design plans and layouts of the proposed dormitories, office complex/conservation facility, camping areas and visitor interpretation centre must be included in the submission and discussed in the HIA;

Response: these were added. See Appendices 1, 2 & 3.

7. A motivation, by means of a tourism study, for the proposed dormitories, camping areas and visitor orientation centres. This motivation must be discussed in the context of the HIA;

Response: As SAHRA noted, the proposed developments are all part of implementing the strategic plan element of the Park Management Plan signed by the Minister. The Client Sanparks could not understand why this is relevant to the HIA. Opening sites without orientation centres and board walks is opening them up to possible destruction if tourist numbers are not managed. A more reasonable approach might be to monitor numbers of visitors. Otherwise, the most important goal is that visitors must access sites. Indeed, a monitoring plan is required to ensure that tourist numbers do not compromise the short to long term conservation of the sites but this is outside the scope of our contractual obligation.

8. A motivation for the need for the construction of the office complex/conservation facilities and the role they are intended for;

Response: There is no need to motivate for this at all. The Mapungubwe Nomination Dossier explicitly states that there is need to build infrastructure that will support research and conservation at the site. Indeed, the current Park Management Plan, which SAHRA requested that we must pay close attention to, provides background to these projects. SAHRA was consulted when the Management Plan was developed. However, we have provided a context to these proposed developments.

The Mapungubwe Nomination Dossier also mentions that objects that are in Pretoria and Johannesburg must be returned to the site. These facilities which will be secure are a step

towards that. SAHRA ought to be encouraging this return and restitution of cultural property as per the National Heritage Resources Act.

9. Proof of consultation with stakeholders such as affected local communities, the World Heritage Unit at DEA, land claimants and other identified Interested and Affected Parties (I & APs);

Response: This was addressed but the programmes that are being proposed were agreed to by all stakeholders during the development of the Park Management Plan. We added a section on stakeholder engagement.

10. A discussion of the existing Site Management Plans and Park Management Plan in the context of the proposed development

Response: This was achieved resulting in a major modification of various sections.

In summary, we are very grateful for the feedback which has considerably strengthened the HIA. We would be very happy to meet to clarify any issues that may arise during the evaluation process.

Yours sincerely

Shadreck Chirikure