

Review of
Phase 1 Heritage Impact Assessment Report of the
Proposed Relocation of the Sani Pass Port of Entry,
KwaSani Local Municipality,
Sisonke District,
KwaZulu-Natal

Prepared for

Pravin Amar Development Planners

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1 INTRODUCTION

eThembeni Cultural Heritage was appointed by the Maloti Drakensberg Transfrontier Project to undertake a Phase 1 Heritage Impact Assessment (HIA) of the existing and proposed Sani Pass border post sites nine years ago (eThembeni Cultural Heritage 2004). The HIA report was approved by Amafa aKwaZulu-Natali, the provincial heritage authority, but given the interim time frame, Pravin Amar Development Planners appointed eThembeni to undertake a review of the 2004 HIA report.

eThembeni undertook this review report under the following constraints:

- The original compact disc containing the site map of the proposed South African border post site in Sani Pass and images of heritage resources at the existing and proposed border post sites, submitted to Amafa and the Maloti Drakensberg Transfrontier Project with the 2004 report, could not be located; and
- eThembeni undertook no fieldwork for the purposes of this review and cannot comment on the current status of the heritage resources identified in 2004.

We have not duplicated the information contained in the 2004 report in this review report, but have focused on providing new comments where appropriate. Accordingly, we urge the reader to peruse both reports for a comprehensive understanding of the heritage assessment process. Please note that this review report does NOT include the existing Sani Pass border post, but is confined to the proposed Port of Entry.

The site audit report for the proposed relocation of the Sani Pass Port of Entry (Pravin Amar Development Planners 2013) contains up-to-date descriptions and maps of the proposed project and its location, as well as the relevant legislation¹, which we have not reproduced here.

2 HERITAGE RESOURCES AND SIGNIFICANCE²

In 2004 eThembeni identified the following heritage resources on or around the location of the proposed Sani Pass Port of Entry:

Structures older than 60 years

A range of structures comprising the remains of the Good Hope Trading Store and attendant buildings are in various stages of decay and ruin. Their collective heritage significance is as follows, unless their condition has deteriorated significantly since 2004:

Value	Level of significance					
	specific community	local	regional	provincial	national	international
aesthetic	low	low	low	low	low	low
architectural	low	low	low	low	low	low
scientific	low	low	low	low	low	low
socio-economic	low-medium	low-medium	low-medium	low-medium	low-medium	low-medium
historical	medium	medium	low-medium	low-medium	low-medium	low-medium

¹ Please note that the Site Audit Report incorrectly refers to the KwaZulu-Natal Heritage Act 10 of 1997 as relevant to this project. In fact, Section 38 of the National Heritage Resources Act 25 of 1999 (as amended) governs HIAs in the province, and the KwaZulu-Natal Heritage Act 4 of 2008 has repealed the 1997 act. The 2008 act stipulates the management of individual heritage resources such as graves, structures and rock art.

² Refer to Appendix A for the criteria used to establish heritage resource significance.

Traditional burial places

A Motae family ancestral grave and other graves located outside of a cemetery managed by a local authority are reputed to exist within the proposed development precinct. Their respective ages are unknown. All human remains have high heritage significance at all levels for their spiritual, social and cultural values.

3 ASSESSMENT OF DEVELOPMENT IMPACT³

We have assumed that all of the structures and traditional burial places will be demolished by the proposed development activities unless specific mitigation measures are implemented. Accordingly, the resultant development impact on heritage resources will be as follows:

Nature	Extent	Duration	Intensity	Impact on irreplaceable resources	Consequence	Probability	Significance
Negative	Low	High	High	High	High	High	High

4 RECOMMENDED MITIGATION MEASURES

General

- All proposed development activities should comply with the requirements of the relevant local, provincial, national and international heritage and environmental legislation and development frameworks, especially those pertaining specifically to the Ukhahlamba Drakensberg Park World Heritage Site.
- A suitably qualified heritage practitioner(s) should reassess the heritage value and significance of the structures and identify the traditional burial places, prior to the finalisation of the development layout and the start of any construction activities.
- The proposed development style and layout should recognise and accommodate the scenic beauty and unique character of the World Heritage Site by implementing, *inter alia*, the following:
 - Incorporate 'green' design principles, including longevity of materials; low overall maintenance; water harvesting; and so forth;
 - Minimise visual impact by limiting structural height and mass; judicious landscaping; use of non-reflective materials and downlighting; and so forth.
- Permits from Amafa will be required for the alteration or demolition of any structures, and for the alteration of any traditional burial place. Amafa may require up to 16 weeks to issue such permits and applications should be made timeously.

³ Refer to Appendix A for the criteria used to establish development impact significance.

Structures older than 60 years

In the 2004 report eThembeni made the following recommendations for the re-use of the remains of the Good Hope Trading Store, which we support and reiterate here, subject to reassessment by a suitably qualified heritage practitioner (see above):

— The caravanserai

This building could be repaired and roofed for conversion into an interpretive or heritage centre, if judged structurally sound by an engineer. The adjacent riverside area (used for corralling pack animals in the past) could be used as a picnic area or tea garden.

— The warehouses / storage sheds

These buildings could be recycled appropriately, if judged structurally sound by an engineer. However, an informant pointed out that floods washed around and through the warehouses every few decades, while the caravanserai remained unaffected by all but the most severe flooding.

— The manager's house

Some of the concrete blocks used in this house's construction were removed intact for use at Cobham Nature Reserve and the remainder of the house may be dismantled and incorporated in buildings to be reconstructed down slope. The gardens and terraces around the house, including the former bowling green, are easily accessible by pedestrians and vehicles. They lend themselves to the development of a viewing site with picnic facilities.

— The compound and rondavel

We consider that these buildings are suited for conversion into quarters for border control personnel, with kitchen and ablution facilities.

Customs' buildings could be built to resemble the original Good Hope Trading Store.

Traditional burial places

- The locations of any / all traditional burial places should be ascertained by a heritage practitioner as described above.
- If at all possible such graves should be left *in situ*, incorporated into the development layout and permanently protected from any damage.
- If this is not possible and graves require relocation, the following procedures apply:
 - Amafa may not issue a permit for any alteration to or disinterment or reburial of a grave unless it is satisfied that the applicant has—
 - (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.
 - 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 Services 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.

5 RECOMMENDED MONITORING

Amafa will stipulate monitoring requirements upon issue of permits for alteration or demolition of any heritage resources.

6 PROTOCOL FOR THE IDENTIFICATION, PROTECTION AND RECOVERY OF HERITAGE RESOURCES DURING CONSTRUCTION AND OPERATION

It is possible that sub-surface heritage resources could be encountered during the construction phase of this project. The Environmental Control Officer and all other persons responsible for site management and excavation should be aware that indicators of sub-surface sites could include:

- Ash deposits (unnaturally grey appearance of soil compared to the surrounding substrate);
- Bone concentrations, either animal or human;
- Ceramic fragments, including potsherds;
- Stone concentrations that appear to be formally arranged (may indicate the presence of an underlying burial, or represent building/structural remains); and
- Fossilised remains of fauna and flora, including trees.

In the event that such indicator(s) of heritage resources are identified, the following actions should be taken immediately:

- All construction within a radius of at least 20m of the indicator should cease. This distance should be increased at the discretion of supervisory staff if heavy machinery or explosives could cause further disturbance to the suspected heritage resource.
- This area must be marked using clearly visible means, such as barrier tape, and all personnel should be informed that it is a no-go area.
- A guard should be appointed to enforce this no-go area if there is any possibility that it could be violated, whether intentionally or inadvertently, by construction staff or members of the public.
- No measures should be taken to cover up the suspected heritage resource with soil, or to collect any remains such as bone or stone.
- If a heritage practitioner has been appointed to monitor the project, s/he should be contacted and a site inspection arranged as soon as possible.
- If no heritage practitioner has been appointed to monitor the project, the head of archaeology at Amafa's Pietermaritzburg office should be contacted; telephone 033 3946 543).
- The South African Police Services should be notified by an Amafa staff member or an independent heritage practitioner if human remains are identified. No SAPS official may disturb or exhume such remains, whether of recent origin or not.
- All parties concerned should respect the potentially sensitive and confidential nature of the heritage resources, particularly human remains, and refrain from making public statements until a mutually agreed time.
- Any extension of the project beyond its current footprint involving vegetation and/or earth clearance should be subject to prior assessment by a qualified heritage practitioner, taking into account all information gathered during this initial HIA.

7 CONCLUSION

We recommend that the development proceed with the proposed heritage mitigation and have submitted this report to Amafa in fulfilment of the requirements of the National Heritage Resources Act 25 of 1999 (as amended; NHRA). According to Section 38(4) of the Act the report shall be considered timeously by the Council which shall, after consultation with the person proposing the development, decide—

- whether or not the development may proceed;
- any limitations or conditions are to be applied to the development;
- what general protections in terms of the NHRA apply, and what formal protections may be applied to such heritage resources;
- whether compensatory action shall be required in respect of any heritage resources damaged or destroyed as a result of the development; and
- whether the appointment of specialists is required as a condition of approval of the proposal.

Please note that Amafa will not advise an applicant of the requirement for an HIA, or comment on an HIA report, without the creation of a case on the SAHRIS electronic database. The procedures for doing so are described in Appendix B. The client may contact Ms Bernadet Pawandiwa at Amafa's Pietermaritzburg office (telephone 033 3946 543) in due course to enquire about the Council's decision.

If permission is granted for development to proceed, the client is reminded that the NHRA requires that a developer cease all work immediately and adhere to the protocol described in Section 6 of this report should any heritage resources, as defined in the Act, be discovered during the course of development activities.

8 BIBLIOGRAPHY

- eThembeni Cultural Heritage, 2004. Cultural Heritage Assessment of the Existing and Proposed Sani Pass Border Post Sites, Ukhahlamba Drakensberg Park, Kwazulu-Natal, South Africa. Unpublished report prepared for the Maloti Drakensberg Transfrontier Project, dated 16 July 2004.
- Pravin Amar Development Planners, 2013. Site Audit Report: For the proposed Relocation of the Sani Pass Port of Entry (PoE), KwaSani Local Municipality, KZN Province. Version 1 Final Report. Unpublished report prepared for the National Department of Public Works, dated January 2013.

APPENDIX A

ASSESSMENT OF HERITAGE RESOURCE VALUE, SIGNIFICANCE AND DEVELOPMENT IMPACTS

Heritage resources are significant only to the extent that they have public value, as demonstrated by the following guidelines for determining site significance developed by Heritage Western Cape (HWC 2007) and utilised during this assessment.

Grade I Sites (National Heritage Sites)

Regulation 43 Government Gazette no 6820. 8 No. 24893 30 May 2003, Notice No. 694 states that: Grade I heritage resources are heritage resources with qualities so exceptional that they are of special national significance should be applied to any heritage resource which is

- a) Of outstanding significance in terms of one or more of the criteria set out in section 3(3) of the NHRA;
- b) Authentic in terms of design, materials, workmanship or setting; and is of such universal value and symbolic importance that it can promote human understanding and contribute to nation building, and its loss would significantly diminish the national heritage.

1. Is the site of outstanding national significance?
2. Is the site the best possible representative of a national issue, event or group or person of national historical importance?
3. Does it fall within the proposed themes that are to be represented by National Heritage Sites?
4. Does the site contribute to nation building and reconciliation?
5. Does the site illustrate an issue or theme, or the side of an issue already represented by an existing National Heritage Site – or would the issue be better represented by another site?
6. Is the site authentic and intact?
7. Should the declaration be part of a serial declaration?
8. Is it appropriate that this site be managed at a national level?
9. What are the implications of not managing the site at national level?

Grade II Sites (Provincial Heritage Sites)

Regulation 43 Government Gazette no 6820. 8 No. 24893 30 May 2003, Notice No. 694 states that: Grade II heritage resources are those with special qualities which make them significant in the context of a province or region and should be applied to any heritage resource which -

- a) is of great significance in terms of one or more of the criteria set out in section 3(3) of the NHRA; and
- (b) enriches the understanding of cultural, historical, social and scientific development in the province or region in which it is situated, but that does not fulfil the criteria for Grade 1 status.

Grade II sites may include, but are not limited to –

- (a) places, buildings, structures and immovable 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 palaeontological sites; and
- (g) graves and burial grounds.

The cultural significance or other special value that Grade II sites may have, could include, but are not limited to –

- (a) its importance in the community or pattern of the history of the province;
- (b) the uncommon, rare or endangered aspects that it possess reflecting the province's natural or cultural heritage
- (c) the potential that the site may yield information that will contribute to an understanding of the province's natural or cultural heritage;
- (d) its importance in demonstrating the principal characteristics of a particular class of the province's natural or cultural places or objects;
- (e) its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group in the province;
- (f) its importance in demonstrating a high degree of creative or technical achievement at a particular period in the development or history of the province;
- (g) its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons; and
- (h) its strong or special association with the life or work of a person, group or organization of importance in the history of the province.

Grade III (Local Heritage Resources)

Regulation 43 Government Gazette no 6820. 8 No. 24893 30 May 2003, Notice No. 694 states that: Grade III heritage status should be applied to any heritage resource which

- (a) fulfils one or more of the criteria set out in section 3(3) of the NHRA; or
- (b) in the case of a site contributes to the environmental quality or cultural significance of a larger area which fulfils one of the above criteria, but that does not fulfill the criteria for Grade 2 status.

Grade IIIA

This grading is applied to buildings and sites that have sufficient intrinsic significance to be regarded as local heritage resources; and are significant enough to warrant *any* alteration being regulated. The significances of these buildings and/or sites should include at least some of the following characteristics:

- Highly significant association with a
 - historic person
 - social grouping
 - historic events
 - historical activities or roles
 - public memory
- Historical and/or visual-spatial landmark within a place
- High architectural quality, well-constructed and of fine materials
- Historical fabric is mostly intact (this fabric may be layered historically and/or past damage should be easily reversible)
- Fabric dates to the early origins of a place
- Fabric clearly illustrates an historical period in the evolution of a place
- Fabric clearly illustrates the key uses and roles of a place over time
- Contributes significantly to the environmental quality of a Grade I or Grade II heritage resource or a conservation/heritage area

Such buildings and sites may be representative, being excellent examples of their kind, or may be rare: as such they should receive maximum protection at local level.

Grade IIIB

This grading is applied to buildings and/or sites of a marginally lesser significance than grade IIIA; and such marginally lesser significance argues against the regulation of internal alterations. Such buildings and sites may have similar significances to those of a grade IIIA building or site, but to a lesser degree. Like grade IIIA buildings and sites, such buildings and sites may be representative, being excellent examples of their kind, or may be rare, but less so than grade IIIA examples: as such they should receive less stringent protection than grade IIIA buildings and sites at local level and internal alterations should not be regulated (in this context).

Grade IIIC

This grading is applied to buildings and/or sites whose significance is, in large part, a significance that contributes to the character or significance of the environs. These buildings and sites should, as a consequence, only be protected and regulated *if the significance of the environs is sufficient to warrant protective measures*. In other words, these buildings and/or sites will only be protected if they are within declared conservation or heritage areas.

Assessment of development impacts

A heritage resource impact may be defined broadly as the net change, either beneficial or adverse, between the integrity of a heritage site with and without the proposed development. Beneficial impacts occur wherever a proposed development actively protects, preserves or enhances a heritage resource, by minimising natural site erosion or facilitating non-destructive public use, for example. More commonly, development impacts are of an adverse nature and can include:

- destruction or alteration of all or part of a heritage site;
- isolation of a site from its natural setting; and / or
- introduction of physical, chemical or visual elements that are out of character with the heritage resource and its setting.

Beneficial and adverse impacts can be direct or indirect, as well as cumulative, as implied by the aforementioned examples. Although indirect impacts may be more difficult to foresee, assess and quantify, they must form part of the assessment process. The following assessment criteria have been used to assess the impacts of the proposed development on identified heritage resources:

Criteria	Rating Scales	Notes
Nature	Positive	An evaluation of the type of effect the construction, operation and management of the proposed development would have on the heritage resource.
	Negative	
	Neutral	
Extent	Low	Site-specific, affects only the development footprint.
	Medium	Local (limited to the site and its immediate surroundings, including the surrounding towns and settlements within a 10 km radius);
	High	Regional (beyond a 10 km radius) to national.
Duration	Low	0-4 years (i.e. duration of construction phase).
	Medium	5-10 years.
	High	More than 10 years to permanent.
Intensity	Low	Where the impact affects the heritage resource in such a way that its significance and value are minimally affected.
	Medium	Where the heritage resource is altered and its significance and value are measurably reduced.
	High	Where the heritage resource is altered or destroyed to the extent that its significance and value cease to exist.
Potential for impact on irreplaceable resources	Low	No irreplaceable resources will be impacted.
	Medium	Resources that will be impacted can be replaced, with effort.
	High	There is no potential for replacing a particular vulnerable resource that will be impacted.

Criteria	Rating Scales	Notes
Consequence a combination of extent, duration, intensity and the potential for impact on irreplaceable resources).	Low	A combination of any of the following: - Intensity, duration, extent and impact on irreplaceable resources are all rated low. - Intensity is low and up to two of the other criteria are rated medium. - Intensity is medium and all three other criteria are rated low.
	Medium	Intensity is medium and at least two of the other criteria are rated medium.
	High	Intensity and impact on irreplaceable resources are rated high, with any combination of extent and duration. Intensity is rated high, with all of the other criteria being rated medium or higher.
Probability (the likelihood of the impact occurring)	Low	It is highly unlikely or less than 50 % likely that an impact will occur.
	Medium	It is between 50 and 70 % certain that the impact will occur.
	High	It is more than 75 % certain that the impact will occur or it is definite that the impact will occur.
Significance (all impacts including potential cumulative impacts)	Low	Low consequence and low probability. Low consequence and medium probability. Low consequence and high probability.
	Medium	Medium consequence and low probability. Medium consequence and medium probability. Medium consequence and high probability. High consequence and low probability.
	High	High consequence and medium probability. High consequence and high probability.

APPENDIX B

SUBMISSIONS TO HERITAGE AUTHORITIES THROUGH THE SAHRIS DATABASE

All submissions to heritage authorities throughout South Africa (including reports and permit applications) are now done online through the electronic database SAHRIS, with immediate effect. We have compiled this short guide to assist potential applicants.

Registration on SAHRIS

If you/your company requires interactions with heritage authorities (e.g. Amafa in KwaZulu-Natal) with any regularity, we urge you to go to www.sahra.org.za/sahris and create a company/personal profile. Tutorial 1 at the bottom of the SAHRIS homepage will provide the necessary guidance.

This registration will allow you to track the progress of your submissions through the SAHRIS system and ensure that you are notified of the heritage authority's decisions. There is also an enormous amount of fascinating heritage-related information that you can access through the database, including tracking where developments are happening (or not).

Heritage matters in KwaZulu-Natal

In the past Amafa would not advise an applicant of the requirement for an HIA, or comment on an HIA report, without receipt of a Need and Desirability Application Form and payment of a submission fee. The form was downloaded from the Amafa website and the fee of R600 was paid to Amafa directly. Amafa has now changed this system by altering the mechanism whereby it assesses the need for an HIA/an HIA report. You have various options:

1. You need a decision from Amafa regarding the need for an HIA for a project

Go to www.sahra.org.za/sahris and click on 'Click here to start new application' on the right of the page. Complete the forms and on the final page upload the proof of payment from that you will have received when you paid R600 to Amafa (bank account details below). We urge you to submit as much background information to Amafa as possible, including maps, geographic coordinates and site photographs.

Track progress of Amafa's decision using your SAHRIS account number.

OR

You can appoint a heritage practitioner (eg. eThembeni) to undertake this task for you, at a cost to your client.

2. You wish to submit an Application for Exemption from an HIA to Amafa

Since an exemption application can only be submitted by a heritage practitioner, the simplest and most cost-effective option is to appoint a heritage practitioner to A. compile the exemption application, B. pay the submission fee and C. create a case on SAHRIS.

OR

You could appoint a heritage practitioner to complete A and C and pay the submission fee directly, thereafter emailing the heritage practitioner the proof of payment.

If you are registered on SAHRIS the heritage practitioner will add you to the case as an affected party and you will be able to track progress of Amafa's decision using your SAHRIS account number.

If you are not registered on SAHRIS the heritage practitioner will inform you of Amafa's decision.

3. You know that you need an HIA

Pay R600 to Amafa (bank account details below), email your appointed heritage practitioner (e.g. eThembeni) the proof of payment, the BID, maps, site photographs, etc. and the heritage practitioner will create the case and upload the necessary documentation when they submit the HIA report.

OR

Ask your heritage practitioner to include the R600 in their overall quote for the job; email them the BID, maps, site photographs, etc. and they will create the case and upload the necessary documentation when they submit the HIA report.

Amafa banking details:

ABSA BANK: Branch: ULUNDI
Bank Code: 630330 Account in the name of AMAFA AKWAZULU- NATALI
Account No. 40-5935-6024

The rest of South Africa

In the rest of the country this system is also in place, but not all provinces require the payment of a fee to SAHRA or the relevant Provincial Heritage Resources Authority (PHRA). Ask your heritage practitioner to advise you accordingly.

APPENDIX C

SPECIALIST COMPETENCY AND DECLARATION OF INDEPENDENCE

Specialist competency

Len van Schalkwyk is accredited by the Cultural Resources Management section of the Association of South African Professional Archaeologists (ASAPA) to undertake HIAs in South Africa. Mr van Schalkwyk has a master's degree in archaeology (specialising in the history of early farmers in southern Africa) from the University of Cape Town and 25 years' experience in heritage management. He has worked on projects as diverse as the establishment of the Ondini Cultural Museum in Ulundi, the cultural management of Chobe National Park in Botswana and various archaeological excavations and oral history recording projects. He was part of the writing team that produced the KwaZulu-Natal Heritage Act 1997. He has worked with many rural communities to establish integrated heritage and land use plans and speaks good Zulu.

Mr van Schalkwyk left his position as assistant director of Amafa aKwaZulu-Natali, the provincial heritage management authority, to start eThembeni in partnership with Elizabeth Wahl, who was head of archaeology at Amafa at the time. Over the past decade they have undertaken almost 1000 HIAs throughout South Africa, as well as in Mozambique.

Elizabeth Wahl has a BA Honours in African Studies from the University of Cape Town, majoring in archaeology, and has completed various Masters courses in Heritage and Tourism at the University of KwaZulu-Natal. She is currently studying for an MPhil in the Conservation of the Built Environment at the University of Cape Town. She is also a member of ASAPA.

Ms Wahl was an excavator and logistical coordinator for Glasgow University Archaeological Research Division's heritage programme at Isandlwana Battlefield; has undertaken numerous rock painting surveys in the uKhahlamba/Drakensberg Mountains, northern KwaZulu-Natal, the Cederberg and the Koue Bokkeveld in the Cape Province; and was the principal excavator of Scorpion Shelter in the Cape Province, and Lenjane and Crystal Shelters in KwaZulu-Natal. Ms Wahl compiled the first cultural landscape management plan for the Mnweni Valley, northern uKhahlamba/Drakensberg, and undertook an assessment of and made recommendations for cultural heritage databases and organisational capacity in parts of Lesotho and South Africa for the Global Environment Facility of the World Bank for the Maloti Drakensberg Transfrontier Conservation and Development Area. She developed the first cultural heritage management plan for the uKhahlamba Drakensberg Park World Heritage Site, following UNESCO recommendations for rock art management in southern Africa.

Declaration of independence

We declare that Len van Schalkwyk, Elizabeth Wahl and eThembeni Cultural Heritage have no financial or personal interest in the proposed development, nor its developers or any of its subsidiaries, apart from in the provision of HIA and management consulting services.

