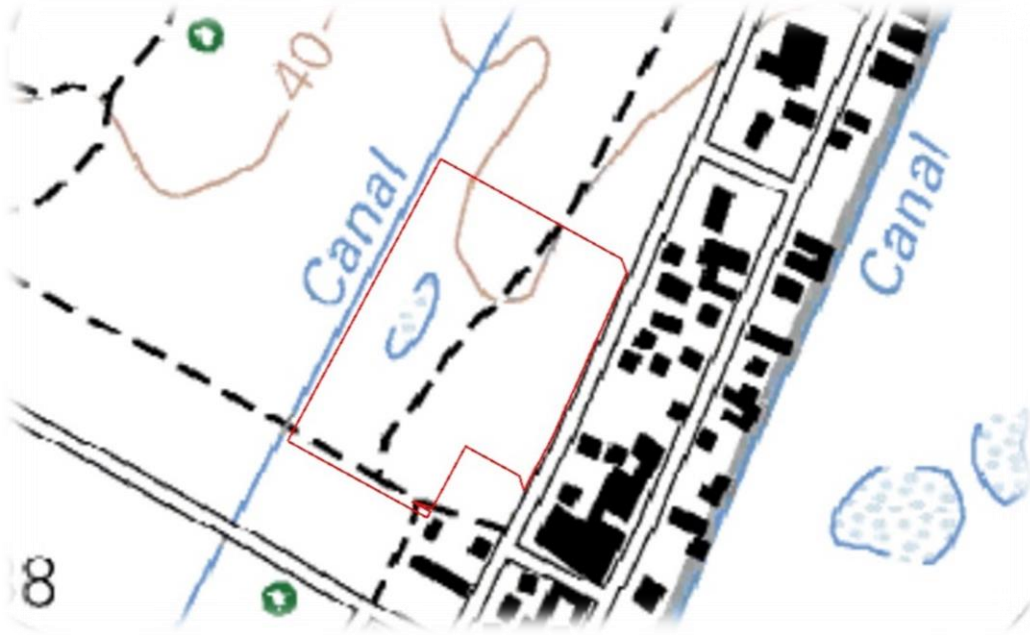


APPENDIX G

APPLICATION FOR EXEMPTION FROM PREPARING A HERITAGE IMPACT ASSESSMENT & KZN AMAFA AND RESEARCH INSTITUTE NO OBJECTION LETTER

MABASA ENERGY AND FUELS (PTY) LTD



**APPLICATION FOR EXEMPTION FROM PREPARING A HERITAGE IMPACT ASSESSMENT (HIA)
THE PROPOSED 750MW COMBINED CYCLE GAS TURBINE POWER PLANT IN RICHARDS BAY,
CITY OF UMHLATHUZE LOCAL MUNICIPALITY, KWAZULU-NATAL PROVINCE**

31 MARCH 2026

Prepared by:

Jennifer Kitto

Nitai Consulting (PTY) Ltd.

147 Bram Fischer Drive

Ferndale

2194



Authors	Qualification	Date	Signature	Version No.
Jennifer Kitto	BA Archaeology and Social Anthropology; BA (Hons) Social Anthropology	31 March 2026		1.0
Prepared for	Nemai Consulting (PTY) Ltd. 147 Bram Fischer Drive, Ferndale Randburg, 2194 			

Nominated Specialist Details

Organisation:	Nitai Consulting
Name:	Jennifer Kitto
Qualifications:	BA Archaeology and Social Anthropology; BA (Hons) Social Anthropology
No. of years' experience:	28
Affiliation (if applicable):	Association of Southern African Professional Archaeologists (ASAPA) - Technical member No.444 Association of Professional Heritage Practitioners (APHP) - Professional Member No. PHP0156 International Association for Impact Assessment (IAIAsa) – Member No. 7151

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1 INTRODUCTION AND BACKGROUND

1.1 Background

Following the promulgation of the Integrated Resource Plan 2019 (IRP 2019), the Minister of Mineral Resources and Energy determined that the procurement of New Generation Capacity is required to ensure energy security and that approximately 3000 (three thousand) megawatts ("MW") would be procured, to be generated from gas. The Gas Independent Power Producers Procurement Programme (GASIPPPP) was identified by the Department of Mineral Resources and Energy (DMRE) as the appropriate programme to procure the new generation capacity.

Mabasa Energy and Fuels (Pty) Ltd (the "Applicant") intends to bid for the GASIPPPP and/or other suitable energy markets and has proposed the development of a 750MW Combined Cycle Gas Turbine (CCGT) Power Plant (the "Plant") in Richards Bay. The Project is located within Phase 1F of the Richards Bay Industrial Development Zone (RBIDZ) under a long-term lease agreement. It should be noted that the application will exclude the natural gas pipeline feeding the CCGT Plant, as well as the grid connection associated with the proposed development.

In terms of Environmental Impact Assessment (EIA) Regulations of 2014, as amended, activities in Listing Notices 1, 2 and 3 will be triggered by the project. The requisite environmental assessment for the project is thus a Scoping and Environmental Impact Reporting (S&EIR) Process, in accordance with the EIA Regulations. The Applicant appointed Nemai Consulting as the independent Environmental Assessment Practitioner (EAP) to conduct the S&EIR Process. Nemai Consulting appointed Nitai Consulting to undertake the Heritage Impact Assessment (HIA) for the project.

2 LEGISLATION

The identification, evaluation and assessment of any cultural heritage site, artefact or find in the South African context is required and governed by various pieces of national legislation, including the National Heritage Resources Act (Act No. 25 of 1999) (NHRA) and associated Regulations, National Environmental Management Act (Act No. 107 of 1998) (NEMA) and associated Regulations as well as the National Health Act (Act No. 61 of 2003) (NHA) specific Regulations governing human remains. In addition, within the province of KwaZulu-Natal, the KwaZulu-Natal Amafa and Research Institute Act, 2018 (Act No 5 of 2018) (A&RIA) also applies.

2.1 National Heritage Resources Act, No 25 of 1999 (NHRA)

The NHRA defines cultural heritage resources (section 3), provides protection to specific types of heritage resources (sections 34, 35, 36) and also requires an impact assessment of such resources for specific development activities (section 38(1)). Section 38(8) further allows for cooperation and integration of the

management of such impact assessment between the national or provincial heritage authority (SAHRA or a PHRA) and the national environmental authority (Department of Forestry, Fisheries and the Environment [DFFE]).

In terms of section 38(1)(a) of the NHRA, the specific types of development activity that may require a HIA include: proposed development that is more than 5000m² in extent. As the proposed project area extent is ± 12.7 ha, this study falls under s38(8) and requires comment from the relevant national (South African Heritage Resources Agency – SAHRA) or provincial heritage resources authority (KwaZulu-Natal Amafa and Research Institute - Amafa).

Sections 34-36 of the NHRA further stipulate the protections afforded to specific types of heritage resources, *i.e.*, structures older than 60 years (s34); archaeological, palaeontological, meteorites (s35); graves and burial grounds (s36)), as well as the mitigation process to be followed if these resources need to be disturbed. The construction of the proposed CCGT plant may result in impacts to any of these types of heritage resources.

2.2 KwaZulu-Natal Amafa and Research Institute Act, 2018 (Act No 5 of 2018) (A&RIA)

The KwaZulu-Natal Amafa and Research Institute (Amafa) is mandated by the KwaZulu-Natal Amafa and Research Institute Act, 2018 (Act No 5 of 2018) (A&RIA).

The total extent of the proposed CCGT plant is larger than 5000m² (approximately 12.2 Ha) and therefore does trigger section 41(1)(a) of Act No 5 of 2018 which lists developments or activities that may require an HIA. However, the information from a previous HIA report (Prins 2015) and the Amafa ROD/comment on that HIA report (SAH16/9973), together with the information from the Heritage Site Sensitivity Verification (SSV) Report (Kitto 2024), indicates that the probability of the project area containing heritage resources is extremely low to negligible.

2.3 National Environmental Management Act, Act 107 of 1998 (NEMA)

As the Project triggers activities in Listing Notices 1, 2 and 3, a S&EIR Process needs to be undertaken in terms of the EIA Regulations of 2014, as amended, promulgated under NEMA. The NEMA and associated Regulations GNR 982 (Government Gazette 38282, 14 December 2014, amended 2017) state that, “the objective of an environmental impact assessment process is to, ... identify the location of the development footprint within the preferred site ... focussing on the geographical, physical, biological, social, economic, *cultural and heritage aspects* of the environment” (GNR 982, Appendix 3(2)(c), emphasis added). The Heritage SSV Report (Kitto 2024) is included in the Draft Scoping Report for the proposed CCGT project.

3 PROJECT DESCRIPTION

3.1 Project Location and Background

Mabasa Energy and Fuels (Pty) Ltd (the “Applicant”) has proposed the development of a 750MW Combined Cycle Gas Turbine Power Plant (CCGTTPP) (the “Plant”) on the project site (Erf 16673). The project site is located in Alton North within Ward 2 of the City of Umhlathuze (CoU) Local Municipality, approximately 1.5 km from the Richards Bay Central Business District (CBD) which falls within King Cetshwayo District Municipality in KwaZulu-Natal. The proposed site is located on Erf 16673 in Phase 1F of the Richards Bay Industrial Development Zone (RBIDZ). See **Figure 1** to **Figure 3**, below.

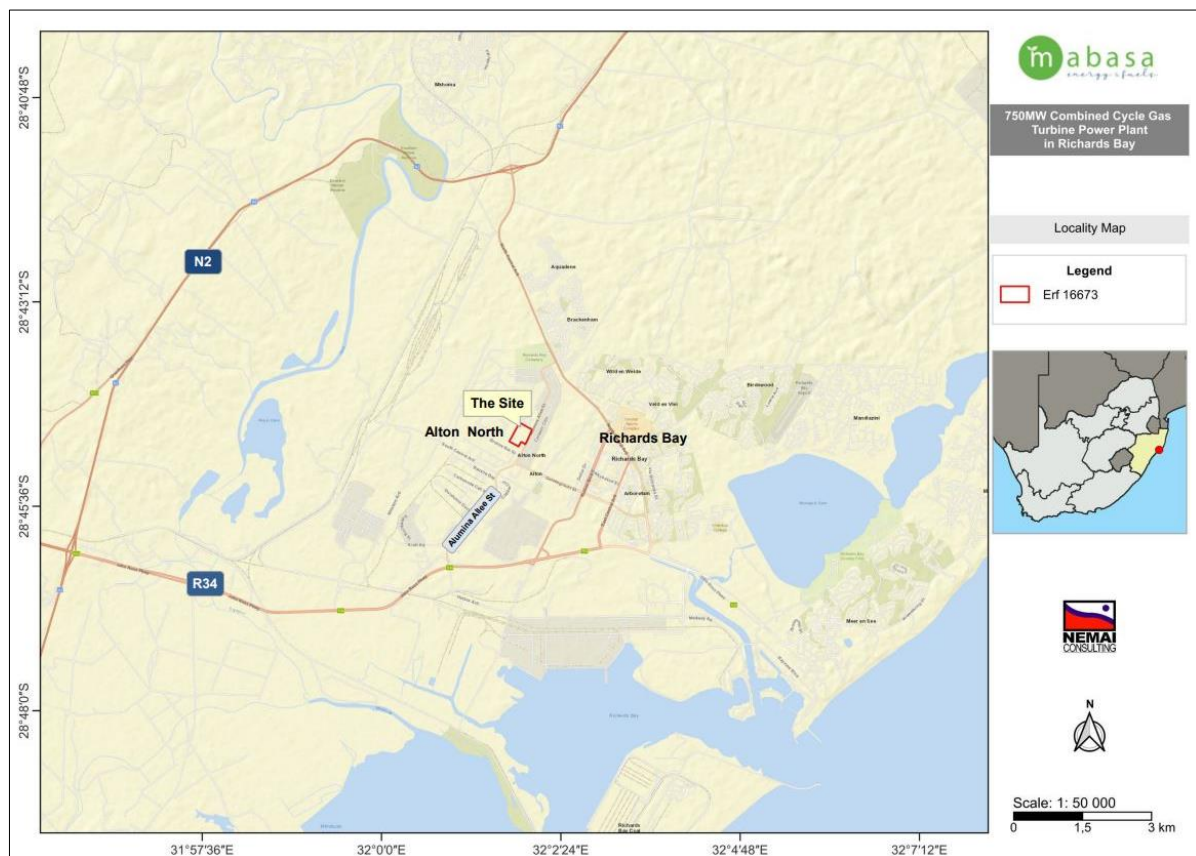


Figure 1: Regional Locality Map of CCGT Power Plant in Richards Bay (Nemai 2026)

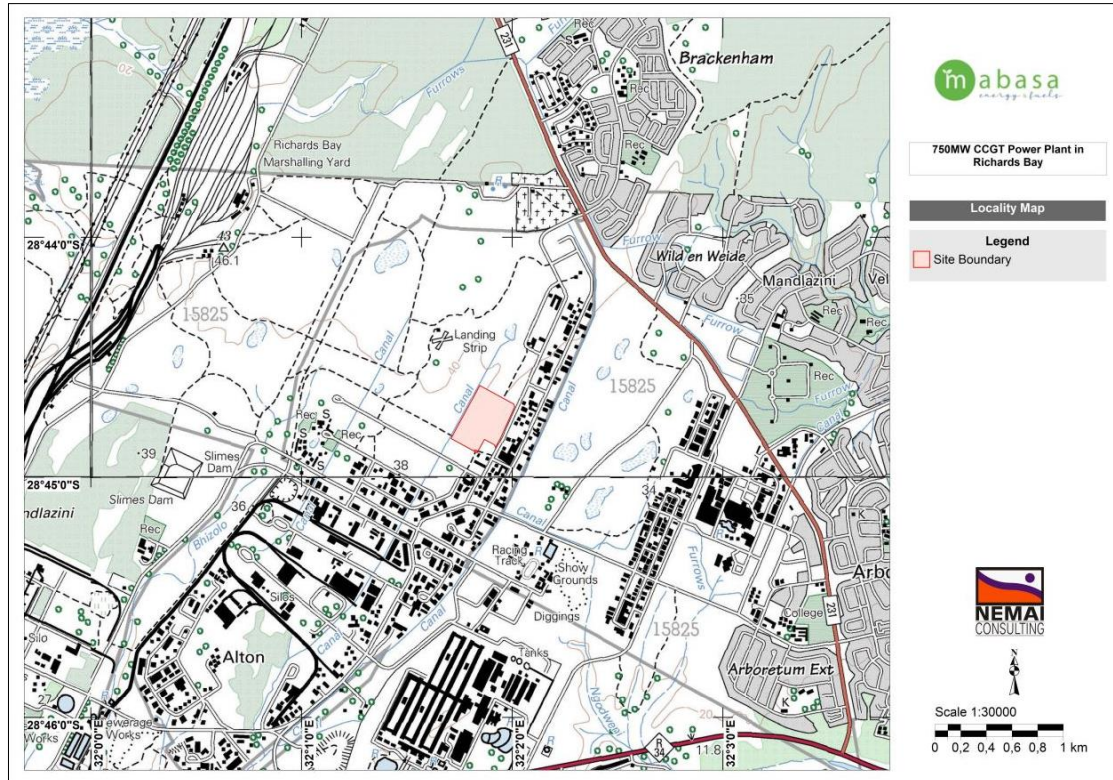


Figure 2: Topographical Locality Map of CCGT Site Footprint (Nemai 2026)

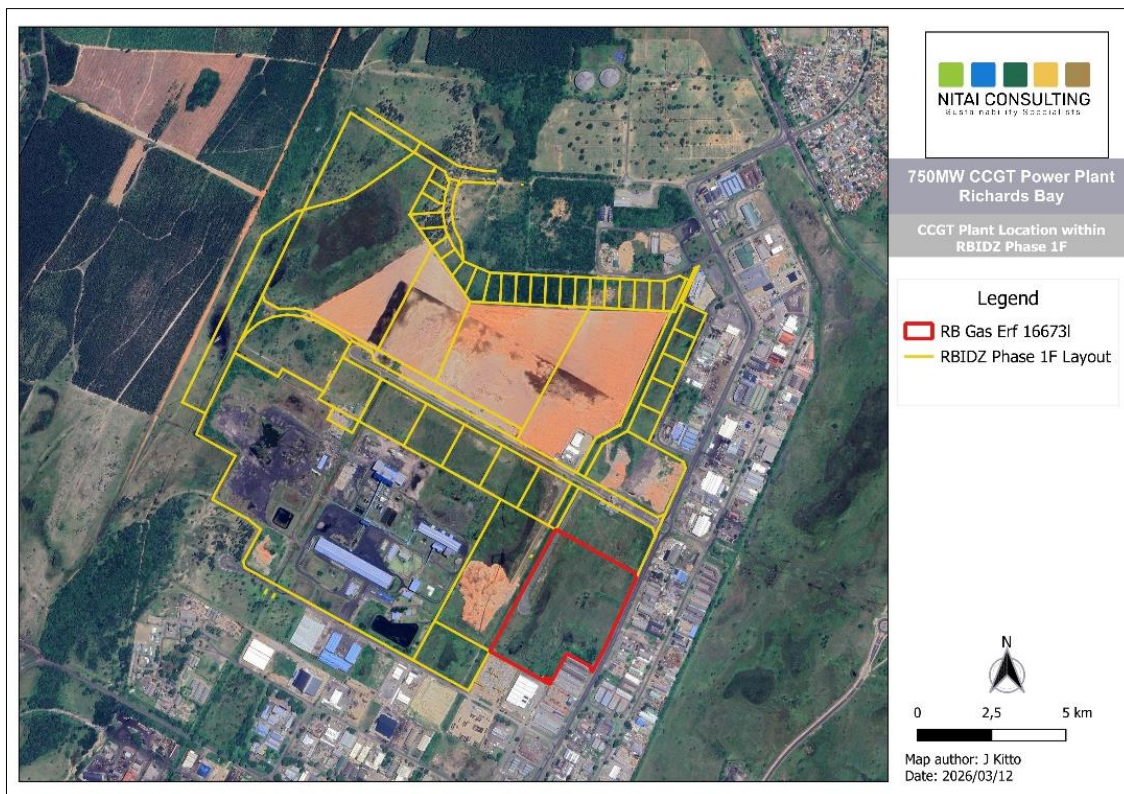


Figure 3: Location of CCGT Plant within Richards Bay Industrial Development Zone- Phase 1F

3.1.1 Gas-to-Power

Gas-to-Power (GTP) describes the process of converting natural gas into power. This process is made possible through the thermodynamic process of converting the chemical energy stored in the natural gas to thermal energy, via mechanical energy to electrical energy. The combined cycle consists of a simple cycle with an attached steam bottoming cycle with a heat recovery steam generator (HRSG). The bottoming cycle utilises excess heat from the single cycle gas turbine to generate steam which is used to generate electrical power through a second generator. In this way, the amount of waste heat and gas consumption is lowered, CO₂ emissions are reduced, and the plant's overall efficiency can increase. A Gas Turbine delivers a reliable, highly efficient, power output, while maintaining best-in-class NO_x and CO emission levels. A typical combined cycle generation process is shown in **Figure 4** below, and a photograph of a CCGT Power Plant is shown in **Figure 5** below.

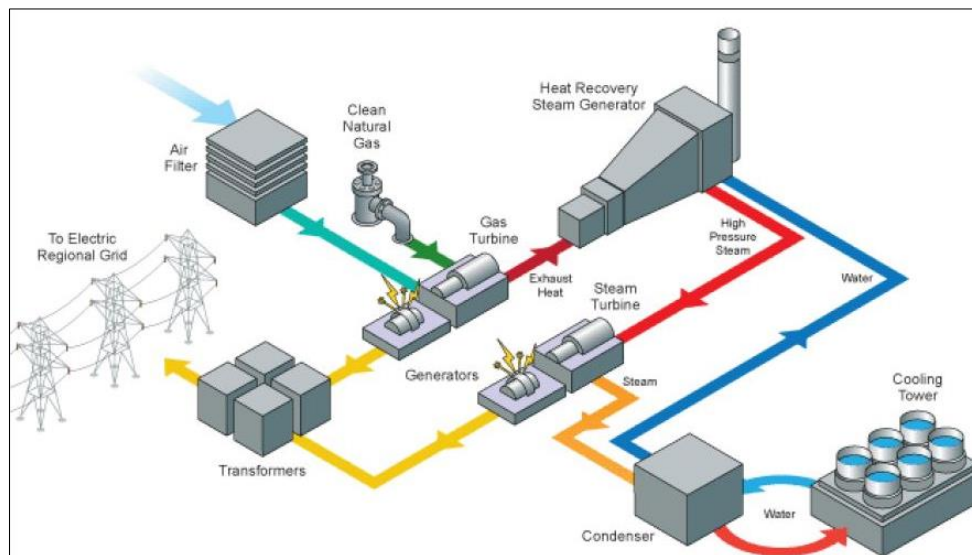


Figure 4: Combined cycle generation process diagram



Figure 5: Photograph of a CCGT Power Plant (Nemai 2026)

3.2 Project Details

3.2.1 Plant components

The Combined Cycle Power Plant (CCPP) Module will consist of 750 MW Power block. A Module consists of two (2) Gas Turbines each having capacity of 250 MW along with Electrical Generators, two (2) HRSGs and one (1) Steam Turbine Generator (STG) having capacity of 250 MW.

The proposed Plant will comprise of the following key equipment components:

- Two (2) General Electric (GE) Frame 9 (model 9F.03) combustion turbines and generators;
- Two (2) triple pressure, 3 drum, natural circulation Heat Recovery Steam Generators (HRSGs);
- One (1) condensing steam turbine and generator;
- One (1) de-aerating surface condenser;
- One (1) induced draft cooling tower;
- Balance of plant (BOP) equipment consisting of Pumps, Heat Exchangers, Transformers, Power Electrics, etc.;
- One (1) integrated plant distribution control system; and
- 275 kV Switchyard comprising of three (3) x 15kV to 275kV step-up transformers and one (1) station auxiliary transformer (the rating to be defined during detailed design).

The Plant will be designed for base load operations at 500MW in Simple Cycle and 750MW in Combined Cycle on a twenty-four hours a day, seven days a week basis. The scope of supply for the Plant will be based on a “2+2+1 combination” comprising of two GE Frame gas turbines (the “Combustion Turbine”) each with a dedicated HRSG to generate and supply steam to a shared steam turbine (the Combustion Turbine, HRSG and steam turbine together known as the “Power Plant”). Generators attached to each of the Combustion Turbines and steam turbines will supply electrical power to the grid. The plant layout is provided in **Figure 6** and **Figure 7**, below.

3.2.2 Project Site and Plant Arrangement

The electrical switchgear and associated auxiliary equipment will be located within constructed buildings. The steam turbines will also be located within a building construction (the “Steam Hall”). The Steam Hall will house an office for technical staff, locker / toilet facility a workshop, a laboratory and storage area. All other major equipment will be designed for outdoor use.

3.2.3 Associated Infrastructure

The infrastructure associated with the CCGT Plant will include the following components:

- Construction camp and laydown area
- Workshop
- Main Office
- Control Building
- Warehouse
- Fire water pump house
- Maintenance facilities

- Storage facilities
- Ablution facilities
- Guard house
- Fencing and gates
- Waste management facilities

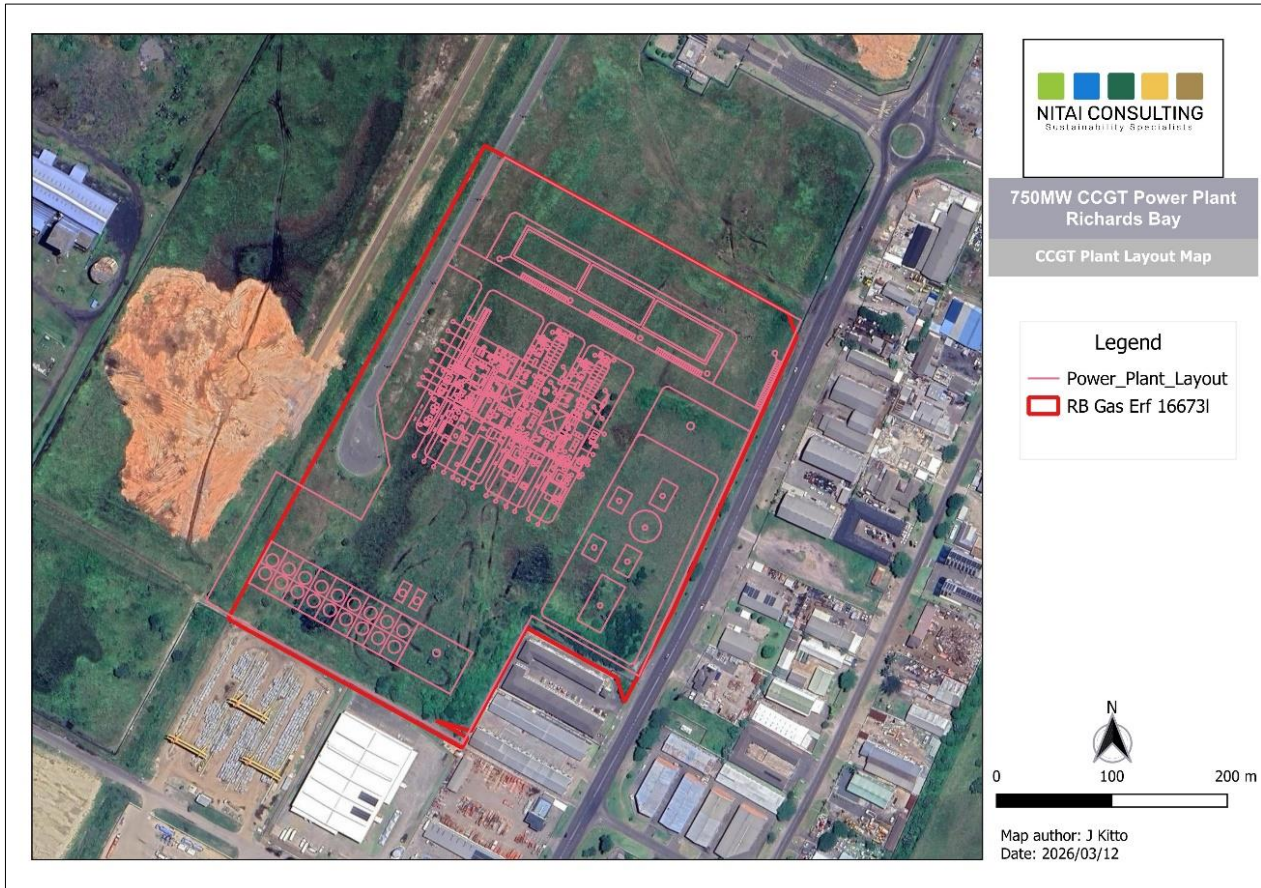


Figure 6: CCGT Plant Layout within the project site

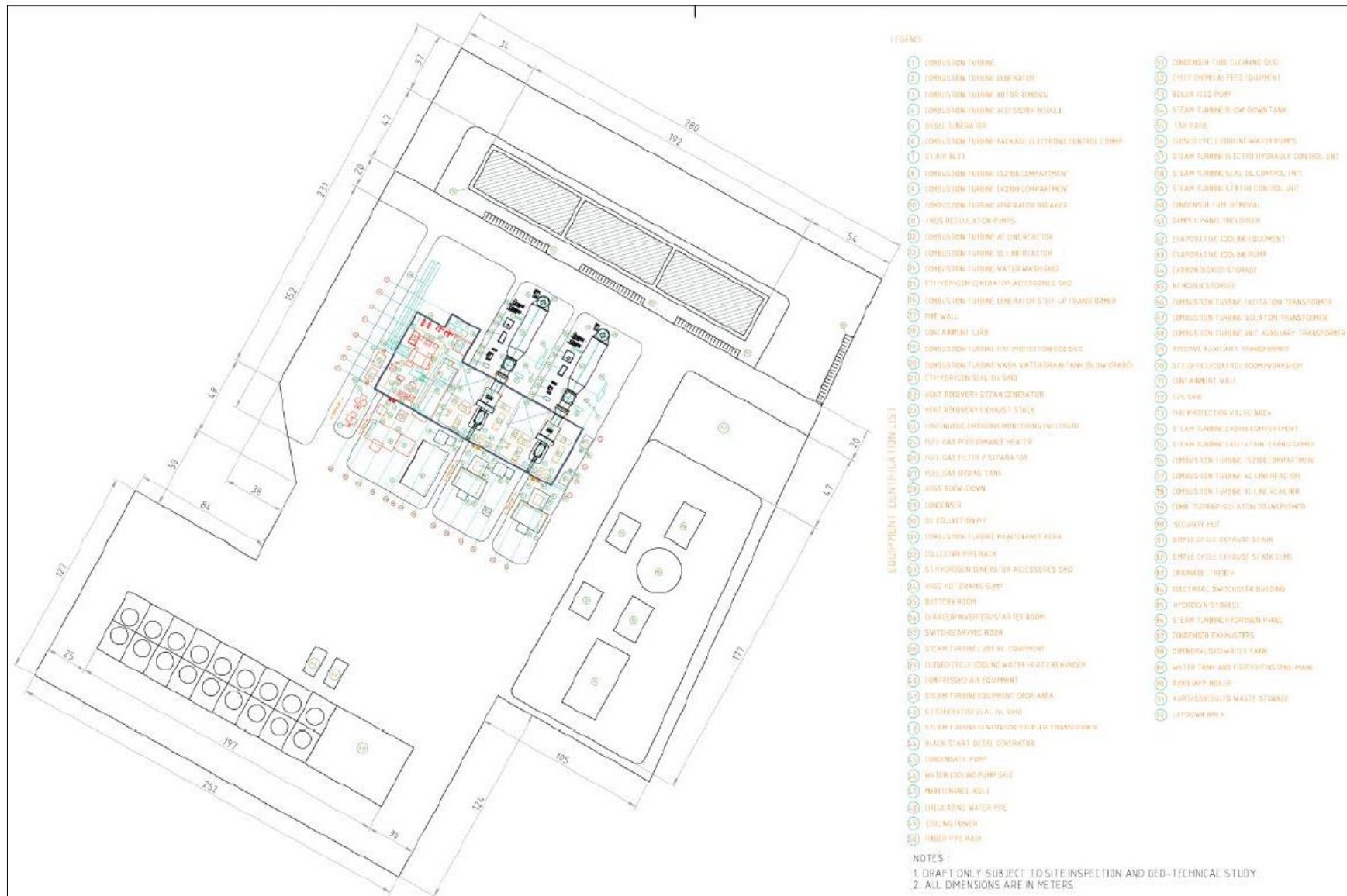


Figure 7: Proposed Plant Layout (Nemai 2026)

4 MOTIVATION FOR EXEMPTION FROM PHASE 1 HIA

A Site Sensitivity Verification (SSV) Report for Heritage (Kitto 2024) was compiled as part of the Environmental Scoping Report (ESR). The SSV Report included a basic desktop study and a site visit. The desktop study included accessing information from the National Web-based Environmental Screening Tool of the Department of Forestry, Fisheries & the Environment (DFFE), an examination of the historical topographic map sheets for the area and a review of past HIA reports which included the specific project area or the immediate surrounding region. Historical satellite imagery obtained from Google Earth was also examined. The desktop findings indicated no heritage features within the project footprint and evidence of considerable disturbance over large sections of the footprint area, specifically between 2004 to 2020.

The site visit of the proposed CCGT Power Plant project footprint took place over one day (12 June 2024) by the author (heritage specialist). A vehicle was used to access the project footprint area and the survey was conducted on foot. The site visit findings confirmed the findings from the desktop study that the project area and immediate vicinity have been disturbed considerably and that no or few heritage resources or archaeological materials were likely to occur in the footprint. The only features identified were of no heritage significance due to being of modern/recent date and not conservation worthy. The SSV Report summary provides more information (but should be read with the original SSV Reports – Kitto 2024 and Butler 2024).

5 SUMMARY OF SITE VERIFICATION REPORT

The findings of the Site Verification Report (Kitto 2024) are summarised below, with additional information from the site visit findings (which was not included in the original Heritage SSV Report).

5.1 Findings of the Historical Desktop Study

The historical desktop study has shown that the general region of Richards Bay and surrounds contains various archaeological and historical resources. Several HIA studies undertaken in the general vicinity of the project footprint since 2010 recorded isolated or very low density occurrences of stone artefacts as well as possible historical to recent human settlement remains (that could contain informal graves). Possible past human settlement areas were recorded in the area east and west of the proposed CCGT project footprint. The only area where significant archaeological resources have been identified in the past is the dune cordon area located several kilometres to the northeast and southwest of the project footprint (Anderson 2023). The various editions (1943 to 2013) of the 1:50 000 topographical 2832CA Kwa Mbonambi map sheet depicted no heritage features within the project footprint. Historical Satellite images (Google Earth) of the area containing the footprint of the proposed CCGT Project were examined for evidence of past disturbance of the area. The information obtained from the satellite images shows evidence of considerable disturbance over large sections of the footprint area in the years between 2004 to 2020.

A basic palaeontological sensitivity was determined using the SAHRIS database South African Fossil Sensitivity Map (<http://www.sahra.org.za/sahris/map/palaeo>). This indicated that the project footprint falls within an area with underlying geology mostly of Low (blue) fossil sensitivity. Therefore, no palaeontological studies are required, however, it is likely that a protocol for finds will be required by Amafa. A separate palaeontological desktop/protocol for fossil finds is being undertaken to address this (Butler 2026).

5.2 Site Survey/Fieldwork Results

The survey of the proposed CCGT Power Plant project footprint took place over one day (12 June 2024) by the author (heritage specialist). A vehicle was used to access the project footprint area and the survey was conducted on foot. The author used a Global Positioning System (GPS) application on a Samsung smartphone (Galaxy A04) for recording the tracklog of the survey and waypoints of any identified possible heritage resources. The camera function on the Samsung mobile phone was used for general photographs of the project study area and identified possible heritage resources.

The survey aimed to find and identify archaeological and other heritage resources such as historic built environment and landscape features of cultural heritage significance. No significant heritage resources were identified within the project area. The majority of the footprint area was covered in extremely dense and long vegetation (grass and shrubs), with a few *vlei*-like areas, with low archaeological visibility. However, examination of several places where bare soil was visible did not reveal any archaeological material.

The only features identified were the remains of the construction camp/laydown area in the northern section (RBG-01) used during the construction of the main entrance and installation of infrastructure between 2017-2019 and a modern/recent midden in the southern section (RBG-02). See the Identified Modern Remains section below (this was not included in the Heritage SSV Report) and **Figure 8 to Figure 15**, below.

Identified Modern Remains/ Material

Site Name	RBG-01 (A, B and C)
GPS Coordinates	- 28.745342°S, 32.032560°E ; -28.745243°S, 32.032848°E ; -28.745032°S, 32.033015°E
Site Description	BEL remains
Approximate Age	Modern/recent
NHRA, No. 25	N/A
KZN A&RIA, No 5	N/A
Field Grading and Ratings	
Site context and description	RBG01A and 01B consist of several scatters of concrete building rubble. RBG01C comprises several open areas covered with dark grey compacted soil (concrete gravel and dust) and containing scattered concrete rubble pieces. The location is in the same area as the construction camp associated with the recent construction of the entrance buildings and infrastructure installation (shown on the satellite images above). It almost certainly represents the remains of the construction camp.
Site Density	N/A
Uniqueness	N/A
Heritage Significance	Not Conservation Worthy (NCW)
Mitigation	No mitigation required



Figure 8: RBG-01, one of the scatters of concrete rubble



Figure 9: Two more scatters of concrete rubble, the dense grass cover is also shown



Figure 10: One of the areas of dark grey compacted soil containing concrete rubble pieces



Figure 11: Another of the areas of dark grey compacted soil

Site Name	RBG-02
GPS Coordinates	-28.747571°S , 32.030600°E
Site Description	Modern/recent midden
Approximate Age	Modern/recent
NHRA, No. 25	N/A
KZN A&RIA, No 5	N/A
Field Grading and Ratings	
Site context and description	Large, modern rubbish/ash midden located in the project area at the eastern edge of the old dirtbike track. It was extremely overgrown. An old plastic computer or printer casing and a piece of metal were the only visible material culture.
Site Density	N/A
Uniqueness	N/A
Heritage Significance	NCW
Mitigation	No mitigation required



Figure 12: RBG-02, modern/recent midden



Figure 13: Piece of plastic casing from old office equipment



Figure 14: Piece of metal



Figure 15: Identified modern/recent material (white icons) overlaid on the site footprint (red polygon)



Figure 16: Site Survey Tracklog (blue line) overlaid on the site footprint (red polygon)

6 BRIEF ARCHAEOLOGICAL-HISTORICAL BACKGROUND OF RICHARDS BAY /EMPANGENI REGION

The archaeological record of South Africa is broadly divided into the Stone Age, Iron Age, and Historic/Colonial periods. The Richards Bay–Empangeni region reflects this wider sequence.

Stone Age

The Earlier Stone Age (ESA) (c. 2 million–300 000 years ago) comprises the Oldowan, Acheulian and Fauresmith technological phases, ranging from simple flake tools to more formal handaxes and cleavers (Esterhuysen & Smith 2007; Lombard et al. 2022). Occasional ESA scatters have been documented in the wider Richards Bay and Empangeni areas (Anderson 2023; Prins 2015; van der Walt 2019).

The Middle Stone Age (MSA) (c. 266.5–29.9 ka) marks the emergence of prepared-core technologies, symbolic behaviour, engravings, beads, bone points, and evidence of complex cognition (Esterhuysen & Smith 2007; Wadley 2013; Lombard et al. 2022). Only a few MSA rock shelters are known in KwaZulu-Natal, most importantly Sibhudu and Border Cave. Border Cave contains exceptionally preserved material spanning MSA, Later Stone Age (LSA) and Iron Age occupations, including organic artefacts, early wooden tools, and an infant burial (Backwell et al. 2023; Bader & Will 2022). Beater (1959) recorded several MSA occurrences near Heatonville, west of Empangeni.

The Later Stone Age (LSA) (c. 30 000 years ago to the recent past) is characterised by microlithic toolkits, bows and arrows, beads, decorated bone, and rock art, associated with San hunter-gatherers and later Khoekhoe pastoralists. LSA occurrences have been recorded across Zululand, including near Empangeni (Deacon & Deacon 1999; Morris 2011; Prins 2015).

Iron Age

The Iron Age marks the arrival and development of Bantu-speaking farming communities who cultivated crops, herded livestock, and smelted metals (Huffman 2007). It is divided into the Early, Middle and Late Iron Age, each defined by distinctive ceramic traditions (Whitelaw & Mazel 2023).

During the Early Iron Age (c. AD 200–900), communities of the Urewe Tradition settled along the KwaZulu-Natal coast. Sites such as Mzonjani (radiocarbon dated to AD 280 ± 40) and Enkwazini (c. AD 300–410) illustrate early mixed farming societies with evidence of small-scale iron smelting (Maggs 1980; Hall 1980). Later Early Iron Age phases relate to the Kalundu Tradition, with key sites including Msuluzi Confluence (AD 640–780), Ndondondwane (AD 780–970), and Ntshekane (AD 970–1050). Ndondondwane, approximately 100 km west of Richards Bay, contains remains of iron smelting, ivory working, and ritual activity (Maggs 1984; van Schalkwyk et al. 1995).

The Late Iron Age (LIA) (c. AD 1300–1840) begins with the Blackburn ceramic tradition, representing the earliest Nguni-speaking farmer settlements in KwaZulu-Natal. Excavations at the Blackburn site revealed dwellings, middens, and evidence of terrace-based settlement (Davies 1971; Birkholtz & Kitto 2015). Later LIA developments include the Moor Park phase, associated with Nguni expansion into

upland grasslands (Huffman 2007). Historical sources indicate culturally cohesive Nguni communities in the region from at least the mid-1500s (Van Jaarsveld 1998, cited in Birkholtz & Kitto 2015).

Historic / Colonial Period

The area around Empangeni traditionally formed part of the territory of the Mthethwa and later the Zulu kingdom. Shaka kaSenzangakhona grew up in this region and subsequently consolidated power with support from the Mthethwa under Dingiswayo, establishing Zulu dominance in the early 19th century (<https://sahistory.org.za/people/shaka-zulu>; Birkholtz & Kitto 2015). Royal kraals belonging to Shaka, Mpande, and Cetshwayo were located in the vicinity of present-day Empangeni (Minnaar 2024).

From 1837, Voortrekker migrants entered the region, leading to conflict with Zulu leadership under Dingane. Key events include the killing of Piet Retief's delegation at uMgungundlovu (1838), the attacks at Weenen and Port Natal, and the Battle of Blood River (16 December 1838), after which Voortrekkers established the short-lived Republic of Natalia (Birkholtz & Kitto 2015; Erasmus 2014). British annexation followed in 1844, with Durban formally established as a borough in 1854 (Erasmus 2014).

In 1906, a rural rebellion against a new poll tax, known as the Bhambatha Rebellion after its leader, Bhambatha kaMancinza, affected a wide area between Greytown and Zululand and resulted in the arrest and conviction of King Dinizulu for treason. The Bambatha Rebellion was the last armed resistance against white rule in before the formation of the Union of South Africa in 1910 (<https://sahistory.org.za/article/bambatha-rebellion-1906>; Tricontinental 2023).

Development of Richards Bay

The town is named after the bay at the mouth of the Mhlathuze River, which was in turn named after Sir Frederick Richards, Commodore and subsequently Admiral of the Cape station of the Royal Navy. He was in charge of the naval force assisting the land forces in the Anglo-Zulu War of 1879 (Raper 2014). On 18 March 1879, Richards landed a brigade from the ship Boadicea which joined the general Naval Brigade's assault on the Zulu positions along the Northern coast (Dube 2011). The Zulu name of Richards Bay is C(h)webeni, meaning 'at the lagoon', although it was also known as Umhlathuzi Lagoon (Raper 2014, Dube 2011).

During the Second World War, the inland lake (Meeren-See) was used as a landing place for the Catalina flying boats, which protected the shipping on the North Coast from German submarines. Port Durnford was used to off-load supplies from the ships and was later used as a major stores depot that became known as Fort Richards (Dube 2011). The town was administered by a health committee from 1954 (Raper 2014).

Recent History.

In 1965 the South African government announced that it intended to develop the area of Richards Bay into a major port and industrial area. Work started on the construction of the Richards Bay Harbour in 1973 and subsequently, in early 1976, approximately 6000 people were removed from the Reserve 6 area to an area called Ntambanana located roughly 34 km northwest of Richards Bay (Association

for Rural Advancement - AFRA 1981). Reserve 6 was a small piece of land to the west of Lake Msingazi originally included in the homeland of KwaZulu. However, Reserve 6 was one of the areas removed from the homeland of KwaZulu after construction began on Richards Bay harbour (AFRA 1981). Ntambanana is a large area of Trust farms, bought by the apartheid government in 1973 specifically for resettlement. It was dry, bush country with no infrastructure provided and located 30km away from Empangeni and 34km away from Richards Bay (AFRA 1981). A second larger area, Reserve No 4., which was located north of Richards Bay, was also removed from KwaZulu in 1981. This land had been settled since before the colonial period by two specific groups: the Mbonambi people and the Sokhulu people (AFRA 1981).

KwaZulu “Homeland”

Under the apartheid government, the Promotion of Bantu Self-government Act (No 46 of 1959), enabled the establishment of eight Regional or Bantu Authorities. In 1968, after a meeting between government officials and the then Paramount Chief of the Zulu people, Cyprian Bhekuzulu, the Paramount Chief apparently submitted a written request for the establishment of a Zulu Territorial Authority. After several years of opposition the Zulu territorial authority was constituted in June 1970 and Chief Mangosuthu Buthelezi was chosen as the Chief Executive Officer (Schmahmann 1978.) This became the so-called “homeland” of KwaZulu (or place of the Zulu). KwaZulu was granted self-government under the apartheid government on 1 December 1977. Although the total area was relatively large, the homeland was comprised of isolated smaller areas scattered throughout what is now the province of KwaZulu-Natal (<https://sahistory.org.za/place/kwazulu-natal-province>).

When the Homeland of KwaZulu was re-incorporated into the Natal province in 1994, by the first democratic government, the previous Province of Natal, which had existed between 1910 and 1994, was renamed KwaZulu-Natal (<https://sahistory.org.za/place/kwazulu-natal-province>).

7 CONCLUSION AND RECOMMENDATIONS

The Heritage Site Sensitivity Report indicated that the site visit findings confirmed the findings from the desktop study that the project area and immediate vicinity have been disturbed considerably and that no or few heritage resources or archaeological materials were likely to occur in the footprint. The only features identified were of modern/recent date and of no heritage significance.

The heritage sensitivity of the project footprint has been confirmed as being of Low sensitivity. Due to the disturbed nature of the proposed site and the verification of the low heritage sensitivity of the project site, it is unlikely that intact heritage resources will be found in the project area.

Therefore it is recommended that the application for exemption from undertaking a Phase 1 HIA study is approved by Amafa Institute.

However, there is a low possibility of uncovering so-called “lag deposits” of stone tools sub-surface, as well as possible unidentified burials (as noted in the SSV section on past HIA studies). Therefore, if

exemption from undertaking a Phase 1 HIA is granted, then it is recommended that a Heritage Chance Finds Procedure must be implemented by the Applicant (see below).

In terms of chance fossil finds, the separate palaeontological desktop/protocol for fossil finds will address this (Butler 2026).

7.1 Heritage Chance Finds Procedure

1. An information section on cultural resources should be included in the Safety Health Environment and Quality (SHEQ) training given to contractors involved in earthmoving activities. These sections must include basic information on:
 - a. Heritage protection;
 - b. Graves; and
 - c. Archaeological finds
2. This module must be tailor-made to include all possible finds that could be expected in the area of construction. Possible finds include:
 - a. Archaeological material, disturbed during construction related site-clearance or excavation activities. This could include stone tools or pottery or historical artefacts such as glass, metal and ceramics.
 - b. Informal, unidentified graves.
3. In the event that a possible find is discovered during construction, all activities must be halted in the area of the discovery and a qualified archaeologist or heritage specialist contacted. Any artefacts uncovered cannot be removed, destroyed or interfered with by anyone on the site. Contractors and workers must be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or palaeontological artefacts, as set out in the Amafa KwaZulu Research Institute Act (Act No. 5 of 2028), Section 57.
4. The archaeologist or heritage specialist needs to evaluate the finds on site and make recommendations towards possible mitigation measures.
5. If mitigation is necessary, an application for a rescue excavation or sampling permit must be lodged with Amafa by the archaeologist.
6. After mitigation, a further application must be lodged with Amafa by the archaeologist for a destruction permit. This application must be supported by the mitigation report generated during the rescue excavation. Only after the permit is issued may such a site be destroyed.
7. In the event that human skeletal material or previously unknown graves are discovered, a qualified archaeologist and the SAPS must be contacted and an evaluation of the finds made to determine/confirm the status of the burial (archaeological/historical or possibly forensic/criminal) and recommend mitigation measures.
8. If any burial is to be exhumed and relocated, the relocation procedures as accepted by Amafa and SAHRA need to be followed. This usually includes an extensive social consultation process and the requirement of permits from SAHRA/ Amafa and the relevant provincial and/or local health authority (this depends on whether the burial is likely to be older or younger than 60 years).

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<https://sahistory.org.za/people/shaka-zulu>

APPENDIX 1: CURRICULUM VITAE OF HERITAGE SPECIALIST

1 Personal Particulars

Profession:	Heritage Specialist
Date of Birth:	11 September 1966
Name of Firm:	Nitai Consulting
Name of Staff:	Jennifer Kitto
Nationality:	RSA
Membership of Professional Societies	Association of Southern African Professional Archaeologists (444) Association of Professional Heritage Practitioners (PHP0156) International Association for Impact Assessment South Africa (7151)

2 Education:

BA Hons Social Anthropology, WITS, South Africa, 1994

BA. Archaeology and Social Anthropology, WITS, South Africa, 1993

Higher National Diploma, Practical Archaeology, Dorset Institute for Higher Education (now Bournemouth University), UK, 1989

3 Employment Record:

2022 – Present Heritage Specialist, Nitai Consulting

Conduct Heritage Impact Assessments;

2012 – 2021 Heritage Specialist, PGS Heritage (Pty) Ltd

Conduct Heritage Impact Assessments

Compile Desktop Historical Research

Compile Heritage Audit and Management Plans

Compile and submit permit applications to National and Provincial Heritage Authorities for Section 34 building alterations and demolitions (under National Heritage Resources Act, 25 of 1999)

Compile and submit permit applications to Provincial and Municipal Health Authorities for Section 36 relocations of graves and burial grounds (under National Heritage Resources Act, 25 of 1999 and National Health Act, No 61 of 2003)

2008 – 2011 Cultural Heritage Officer (National), Burial Grounds and Graves Unit: South African Heritage Resources Agency (SAHRA)

Review and assess permit applications for relocation of historical graves and burial grounds.

1998 – 2008 Cultural Heritage Officer (Provincial), Provincial Office – Gauteng: SAHRA

Review and comment on heritage and archaeological impact reports

Research for the nomination and grading process for related to the declaration of specific heritage resources as National Heritage Sites

Monitoring of certain archaeological and built environment National Heritage Sites (e.g. The Cradle of Humankind World Heritage Site)

4 Selected Consultancies

4.1 Heritage Assessment, Rotek Rosherville Property, City of Johannesburg Metropolitan Municipality, Gauteng

2025, Undertake Heritage Assessment (baseline audit) of built environment heritage resources located within specified area of the Eskom Rotek Industries Rosherville property.

4.2 Eskom Minor electrification project: Proposed Overhead Powerline for AQ Sibiya, City Of Umhlathuze Local Municipality, King Cetshwayo District Municipality, KwaZulu Natal

2025, Undertake Heritage Impact Assessment of all heritage resources situated within or adjacent to the proposed powerline route.

4.3 Eskom Minor electrification project: Proposed Inkunzi NB38 Hare Line Upgrade Electrification Project on Portion of Umngeni Local Municipality, Umgungundlovu District Municipality, KwaZulu Natal

2025, Undertake Heritage Impact Assessment of all heritage resources situated within or adjacent to the proposed powerline route.

4.4 Eskom Minor electrification project: Proposed Construction of Overhead Powerline in Macekane, City of Umhlathuze Local Municipality, King Cetshwayo District Municipality, KwaZulu Natal

2025, Undertake Heritage Impact Assessment of all heritage resources situated within or adjacent to the proposed powerline route.

4.5 Karoo Geophysical Research Project: Seismic Surveys Within the Central Karoo District, Eastern Cape Province

2025, Undertake Heritage Impact Assessment of all heritage resources situated within or adjacent to the road reserves of the proposed survey routes

4.6 Karoo Geophysical Research Project: Seismic Surveys Within the Central Karoo District, Western Cape Province

2025, Undertake Heritage Impact Assessment of all heritage resources situated within or adjacent to the road reserves of the proposed survey routes

4.7 Rietspruit Pipeline Deviation, Emfuleni, Gauteng

2025, Undertake Heritage Impact Assessment of all heritage resources associated with the footprint of the proposed pipeline deviation

4.8 Postmasburg Hospital, Postmasburg, Northern Cape

2025, Undertake Heritage Impact Assessment of all heritage resources associated with the footprints for the proposed new hospital

4.9 Sulphonation Plant, Wadeville, Ekurhuleni, Gauteng

2025, Undertake Heritage Impact Assessment of all heritage resources associated with the footprints for the proposed new sulphonation plant

4.10 Varsputs and Brakputs Wind Energy Facility projects, Springbok, Northern Cape

2024, Undertake Heritage Impact Assessment of all heritage resources associated with the respective footprints for the two Wind Energy Facility projects and associated grid infrastructure

4.11 Lemenong and Boitekong BESS Projects, Rustenburg, North-West Province

2024, Undertake Heritage Impact Assessment of all heritage resources associated with the respective footprints for the two Battery Energy Storage System (BESS) projects

4.12 Leratong Reservoirs, Johannesburg, Gauteng

2024, Undertake Heritage Impact Assessment of all heritage resources associated with the project footprints for the construction of two water reservoirs

4.13 Hartebeest Skeur WEF, Damara 1 & 2 SEFs, & associated infrastructure

2023/24 Undertake Heritage Impact Assessment of all heritage resources associated with the respective footprints for the two Wind Energy Facility (WEF) projects and associated grid infrastructure

4.14 New Vessel Tracking System Tower, Port of Durban, KwaZulu Natal

2023/2024, Heritage Specialist, Undertake Heritage Impact Assessment of all heritage resources within or adjacent to the development footprint

4.15 Pensfontein Residential Development, Postmasburg, Northern Cape

2023/2024, Heritage Specialist, Undertake Heritage Impact Assessment of all heritage resources within or adjacent to the development footprint

4.16 Grootvlei 600MW Solar Plant, BESS & Grid Connection Project, near Ventersdorp, JB Marks Local Municipality, North West Province

2023, Heritage Specialist, Undertake Heritage Impact Assessment of all heritage resources within or adjacent to the development footprint

4.17 Bhobhoi Pipeline Upgrade, Port Shepstone, Kwa-Zulu Natal Province.

2023, Heritage Specialist, Pipeline Upgrade associated with proposed Umzimkhulu River Weir and Pumpstation Upgrade, Undertake Heritage Impact Assessment of all heritage resources along the proposed route and submit HIA Report to Amafa Institute. Inclusive of Grave Management Plan.

4.18 Pilanesberg Platinum Mine Community Bulk Water Supply pipeline near Pilanesberg Nature Reserve, North West Province

2023, Heritage Specialist, Proposed development of Bulk Water Supply pipeline for local community; Undertake Heritage Impact Assessment of all heritage resources along the proposed route

4.19 400kV Transmission and 132kV distribution power lines for the Apollo-Lepini-Mesong Project, Gauteng Province, South Africa

2023, Heritage Specialist, Proposed development of a 400kV transmission and 132kV power lines; Undertake Heritage Impact Assessment of all heritage resources along the proposed routes for the two power lines.

4.20 Carbon Capture Utilisation & Storage (CCUS) Pilot Project - 3D Seismic Survey & Drilling, Leandra, Mpumalanga Province, South Africa

2023, Heritage Specialist. Proposed 3D Seismic Survey within the Leandra area, Undertake Heritage Impact Assessment of all heritage resources within the footprint of the survey area.

4.21 Carbon Capture Utilisation & Storage (CCUS) Pilot Project - Injection Site 2023, Leandra, Mpumalanga Province, South Africa

2023, Heritage Specialist. Proposed Injection Site 2023 for the CCUS pilot project within the Leandra area, Undertake Heritage Impact Assessment of all heritage resources within the footprint of the survey area.

4.22 Decommissioning of Komati Power Station, Middelburg, Mpumalanga, South Africa

2023, Heritage Specialist, in association with architectural historian; Proposed Decommissioning of the Komati Power Station, Undertake Heritage Impact Assessment of all heritage structures within the power station

4.23 Paulputs Strengthening Powerline Route, Postmasburg-Paulputs, Northern Cape

2023, Heritage Specialist, Proposed development of a 400kV transmission lines; Undertake Heritage Impact Assessment of all heritage resources along the proposed route

4.24 Mooivlei Solar PV Facilities, near Kroonstad, Free State Province, South Africa

2022/2023 Heritage Specialist, proposed development of three Solar PV facilities west of Kroonstad, Undertake Heritage Impact Assessment of all heritage resources associated with the three Solar PV facilities:

- Mooivlei Solar 1 PV facility, west of Kroonstad
- Mooivlei Solar 2 PV facility, west of Kroonstad
- Mooivlei Solar 2 PV facility, west of Kroonstad

4.25 Kroonstad South Solar PV Facilities near Kroonstad, Free State Province, South Africa

2022/2023 Heritage Specialist, Development of five Solar PV facilities south of Kroonstad, Undertake Heritage Impact Assessment of all heritage resources associated with the five solar PV facilities:

- Oslaagte Solar 1 PV project, south of Kroonstad
- Oslaagte Solar 2 PV project, south of Kroonstad
- Oslaagte Solar 3 480MW PV facility south of Kroonstad
- Leeuwspruit Solar 1 320MW PV facility south of Kroonstad
- Leeuwspruit Solar 2 PV facility south of Kroonstad

4.26 Rustenburg Solar PV Facilities, North West Province, South Africa

2022/2023 Heritage Specialist, Development of three Solar PV facilities near Rustenburg, , Undertake Heritage Impact Assessment of all heritage resources associated with the three solar PV facilities.

- Onderstepoort Solar 1 PV facility, near Rustenburg
- Onderstepoort Solar 2 PV facility, near Rustenburg
- Rhino Solar PV facility, near Rustenburg

4.27 Seelo Solar PV Facilities, near Carletonville, North West Province, South Africa,

2022/2023 Heritage Specialist, Development of three Solar PV facilities near Carletonville, Undertake Heritage Impact Assessment of all heritage resources associated with the three solar PV facilities.

- Seelo Alpha 240MW Solar PV & BESS facility, near Carletonville
- Seelo Beta 240MW Solar PV & BESS facility, near Carletonville
- Seelo Charlie Solar PV & BESS facility, near Carletonville

4.28 Ferrum-Upington Powerline Route, Upington-Kathu, Northern Cape

2022/2023 Heritage Specialist, Proposed Deviations to Authorised Route of a 400kV transmission power line between Upington and Kathu, Undertake Heritage Impact Assessment for of all heritage resources along the proposed route

5 Languages:

English - excellent speaking, reading, and writing

Afrikaans –fair speaking, reading and writing

Proposed 750MW Combined Cycle Gas Turbine Power Plant in Richards Bay, City of uMhlatuze Local Municipality. Case No.27963

Letter

IN TERMS OF SECTION 41(8) OF THE KWAZULU-NATAL AMAFA AND RESEARCH INSTITUTE ACT (ACT 05 OF 2018)

Bavumile Skhosana
Mabasa Energy and Fuels (Pty) Ltd
125 Alumina Allee
Richards Bay Industrial Development Zone, Alton
Richards Bay
3900

Proposed 750MW Combined Cycle Gas Turbine Power Plant in Richards Bay, City of uMhlatuze Local Municipality, King Cetshwayo District Municipality, Kwazulu-Natal.

The Applicant intends to bid for the Gas Independent Power Producers Procurement Programme (GASIPPPP) and has proposed the development of a 750MW Combined Cycle Gas Turbine (CCGT) Power Plant (the "Plant") in Richards Bay, which falls within the City of uMhlatuze. The Project is located within Phase 1F of the Richards Bay Industrial Development Zone (RBIDZ) under a long-term lease agreement. The earmarked site is located on Erf 16673 in Phase 1F of the RBIDZ, which is approximately 12.7 Ha in extent.

The application was tabled on 22 April 2026 for a decision by the Heritage Officers' Committee Meeting. The project area and immediate vicinity have been disturbed considerably. Several previous Heritage Impact Assessments done in the past, as well as the Site Sensitivity Verification Report concluded that the chance of uncovering archaeological and/or skeletal remains are very low. A desktop Palaeontology Assessment stated that the paleo-sensitivity is low.

NO OBJECTION LETTER - FINAL COMMENT: THE PROJECT IS EXEMPTED FROM A FURTHER FULL PHASE 1 HERITAGE IMPACT ASSESSMENT, ONLY CHANCE FIND PROTOCOLS WILL APPLY

The KwaZulu-Natal Amafa and Research Institute therefore has no objection to the proposed development

You are also required to adhere to the below-mentioned standard conditions:

1. The KwaZulu-Natal Amafa and Research Institute should be contacted if any heritage objects are identified during earth-moving activities and all development should cease until further notice.

2. No structures older than sixty years or parts thereof are allowed to be demolished, altered, or extended without a permit from the KwaZulu-Natal Amafa and Research Institute.
3. Under no circumstances may any heritage material be destroyed, inundated, collected, or removed from site unless under direction of the KwaZulu-Natal and Amafa Research Institute and a heritage specialist.
4. Should any remains be found on site that is potentially human remains, the South African Police Service (SAPS) should also be contacted. No SAPS official may disturb or exhume such remains, without the necessary permission from the KwaZulu Natal Amafa and Research Institute.
5. No activities are allowed within 50m of a site, which contains rock art.
6. Sources of all-natural materials (including topsoil, sands, natural gravels, crushed stone, asphalt, etc.) must be obtained in a sustainable manner and in compliance with the heritage legislation.

Failure to comply with the requirements of the National Heritage Resources Act and the KwaZulu Natal Amafa and Research Institute Act could lead to legal action being instituted against the applicant.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



Celeste Rossouw
Senior Heritage Officer: Conservation of the Built Environment (Masters) & Archaeology (Honors)
KwaZulu-Natal Amafa and Research Institute

Amafa Terms & Conditions:



HERITAGE IDENTIFICATION, MANAGEMENT & PROTECTION

Enquiries: Celeste Rossouw

Email: celeste.rossouw@amafainstitute.org.za

Tel: 033 394 6543

Date: Tuesday, 5 May, 2026

Case ID: 27963

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to the Institute immediately.
3. The Institute reserves the right to request additional information as required.

ADMIN:

Direct URL to case: <https://sahris.org.za/395338>