The Director and Council Amafa aKwaZulu-Natali PO Box 523 Ulundi 3838

11 March 2005

The Director and Council

KwaBulawayo Development

Yesterday I was made aware of the KwaBulawayo Development proposal which outlines plans to develop the tourist and educational potential of KwaBulawayo and related sites in the Bhekeshowe area between Eshowe and Empangeni. While I support the development of these historic resources, I have reservations about the current proposal (Business Plan II, April 2004; no authorship indicated, possibly IP&M Consulting Services). These are as follows.

The proposal promotes the development of tourist facilities on the actual site of KwaBulawayo, despite statements to the contrary. The author of the business plan has clearly not understood the nature of archaeological sites, nor the kind of restrictions I faced in the field at KwaBulawayo. I stress that my sketch of KwaBulawayo on the hillslope, on which the development proposal is based, represents only an hypothesized position of the *ikhanda*. It was not possible to be more precise about its location using the survey techniques I adopted and I certainly did not fix 'the actual position and outline of KwaBulawayo' (p15 of business plan). It would be impossible to mark out the *ikhanda* and individual houses with white-painted stones and aloes, as proposed in the business plan, and I doubt that the location of individual houses will ever be revealed, even by more sophisticated survey techniques.

My hypothesized position was based on the slope contours and the archaeological evidence which my survey yielded. A good grass cover on the northern parts of the site prevented the identification of archaeological features there that might have set further limits on the position of the site. This indicates the tentative nature of the hypothesized position. Disturbingly, the business plan proposes that the KwaBulawayo tourist facilities be placed within metres of my hypothesized northern *uhlangothi*. This is far too close. It will certainly destroy any remaining middens and may well destroy vestiges of the *uhlangothi* that might be detectable using modern technology, such as ground penetrating radar. Further, the footprint of the site in the form of scattered sherds extends some way beyond the middens. This too will be destroyed.

The tourist facilities should be located elsewhere, perhaps at the base of KwaBulawayo hill where the P230 meets the hill on the Eshowe side of the site. This would allow the retention of the sense of place at KwaBulawayo, which is impressive with its views to Empangeni, over the Nkwaleni valley and to the Melmoth plateau. I keeping with this sense of place, I would recommend only minimal interpretative development on the actual site.

According to the business plan, Amafa has been consulted to ensure that the development complies 'in all respects' with statutory requirements. Given the proposed proximity of the tourist facilities to the historic site, however, I urge Amafa not to allow this development to go ahead as planned.

Yours sincerely

G. Whitelaw

HoD: Archaeology

cc. Ms L. Berjak, Jeffares & Green, Pietermaritzburg