



14 February 2018  
511330

South African Heritage Resources Agency  
Via SAHRIS website

## Attention: Lesa la Grange

Dear Lesa

### Port of Durban: Notification of Intent to Develop

Transnet National Ports Authority (TNPA) have identified the need to upgrade the Island View seawalls in the Port of Durban. PRDW Consulting Port and Coastal Engineers (PRDW) have appointed SRK Consulting (South Africa) (Pty) Ltd (SRK), on behalf of TNPA, to undertake a screening assessment to identify all environmental permits, approvals and regulatory requirements.

The purpose of this letter is to:

- Provide a description of the proposed works at the Port of Durban;
- Confirm the need for an application in terms of Section 34 of the National Heritage Resources Act 25 of 1999 (NHRA) for repairs to structures older than 60 years;
- Confirm the need for an application in terms of Section 38 (2) of the NHRA; and
- Provide supporting information.

#### 1. Proposed works at the Port of Durban

The proposed works at the Port of Durban consist of upgrades to the shoreline protection along the Island View shoreline, including the installation of scour protection in certain areas. A Pre-Feasibility study undertaken by PRDW considered eleven alternative solutions for repair and upgrade of the Island View seawalls. These options were work-shopped with TNPA, following which it was unanimously agreed that rock revetments are the most effective and the preferred method of protecting the Island View shoreline. This is also the current coastal protection in place around the Island View terminal.

Additional details regarding the proposed works at the Island View terminal are provided in the Screening Report attached as **Appendix A**. These works have not yet commenced.

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## 2. Application in terms of Section 34 of NHRA

PRDW undertook an investigation into the age of the existing structures, based on as-built drawings available for the project area. Many of the berth structures were constructed in the 1940s, and are thus over 60 years old. As such, SRK believes a permit for repairs to these structures will be required, and will submit relevant information in support of such a permit application on the SAHRIS website. Section 5.4 of **Appendix A** provides additional information and drawings of the structures older than 60 years.

## 3. Application in terms of Section 38 of NHRA

The proposed upgrades at the Port of Durban will not include any linear developments exceeding 300 m in length and will not require the rezoning or subdivision of any property. The proposed works will all take place within the existing footprint of harbour infrastructure, apart from dredging and the disposal of dredge spoil.

The exact surface area that will be dredged cannot yet be accurately determined and will depend on the dredge width required at each structure. However, PRDW identified three potential scenarios for the purposes of the heritage application, as summarised in Table 1 below.

**Table 1: Summary of potential surface area to be excavated during construction**

Scenario	Dredge width per structure	Total dredged area
Scenario 1: Best case	10m	4100m <sup>2</sup>
Scenario 2: Middle ground	15m	5300m <sup>2</sup>
Scenario 3: Worst case	20m	6100m <sup>2</sup>

Although the option of disposing of the dredged material at the existing marine disposal site was considered, TNPA has taken the decision not to dump the dredged material at sea due to the volumes, but rather utilise it in the basin for the infilling of scour holes. Scour hole areas ranging in size from 1000 to 8000m<sup>2</sup> will be filled. **Appendix A** provides additional details regarding the proposed dredging and dredge disposal.

An area exceeding 5 000 m<sup>2</sup> in size would thus be affected by the proposed dredging and dredge disposal. An application in terms of Section 38 of the NHRA may thus be required, although SRK does not anticipate that any heritage resources would be affected or disturbed by the dredging or filling of the scour holes and would thus appreciate confirmation on any further information required by SAHRA.

## 4. Conclusion

Based on the above, SRK herewith:

- Submits information to inform the **Section 34 application**; and
- Requests **confirmation regarding whether a Section 38 application** is required,

Should you have any queries or require any further information, please do not hesitate to contact the undersigned. Could you please ensure that all correspondence with regard to this application is addressed or copied to Jessica du Toit at [jedutoit@srk.co.za](mailto:jedutoit@srk.co.za)

Yours faithfully,

### SRK Consulting (South Africa) (Pty) Ltd

SRK Consulting - Certified Electronic Signature

 **srk** consulting

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Environmental Scientist