

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Ruan Brand
Tel: 0214628672
Email: RBrand@sahra.org.za
CaseID: 17888

Date: Tuesday October 04, 2022
Page No: 1

Letter

In terms of Section of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr G Govender

Eastern Cape - Department of Economic Development, Environmental Affairs and Tourism
Private Bag X5001
Greenacres
6057

The Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT) is responsible for managing coastal areas as well as establishing Estuarine Management Plans in the Eastern Cape. The DEDEAT has appointed Habitat Link Consulting (Pty) Ltd (HLC) to develop an Estuarine Management Plan (EMP) for the Kowie Estuary, located in Port Alfred, within the Ndlambe Local Municipality.

The Maritime and Underwater Cultural Heritage (MUCH) unit at the South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Estuarine Management Plan (EMP) for the Kowie Estuary, in Port Alfred in the Eastern Cape, South Africa. Although it is not a legislative requirement that SAHRA issues a comment during this process, as set out in the 2021 National Estuarine Management Protocol (NEMP), there are MUCH resources within the Kowie Estuary that SAHRA is mandated to protect.

On Page 29, under Table 5.5, Point 1, A, SAHRA is listed as responsible for the installation of markers, buoys, and/or signage. While SAHRA can offer support in terms of providing knowledge and editorial input for potential signage and/or buoys/markers, demarcation of heritage features with the use of markers is beyond its capacity. Therefore, this section must be amended to accurately reflect who is responsible for this.

As access to certain parts of the Kowie river might be essential for the safeguarding of certain elements of intangible cultural heritage (ICH), SAHRA is pleased to see that there is a specific item in this same table, under Point 2, D, that speaks to investigating and ensuring safe and equitable access for ICH related activities.

SAHRA is also pleased to see that on page 35 of the EMP that there is mention of protecting heritage resources within the estuary via the zonation plan with three specific heritage sites being mentioned, namely the Old Stone Mill, the old jetty, and the wreck of the Buffalo (1889). On page 36, in Table 6.1, these heritage site's use conditions are defined as:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

- No physical access to the heritage feature (for observation only);
- Control of visitor numbers, frequency and group sizes; and
- No development activities within a 50m radius of heritage sites.

It is SAHRA's understanding that the Old Stone Mill is privately owned, and this specific heritage site's conditional uses should be drafted in consultation with the owner(s) and the relevant management authority for heritage structures. Apart from for the Old Stone Mill, these conditions seem reasonable, and a point must be added that mentions that if any work is to be done on, or in proximity to, the heritage resources, such as maintenance work, that the suitable management authorities must be approached as this may trigger the need for a permit. The relevant contacts are SAHRA for resources that are maritime in character or that fall below the high-water mark, and the Eastern Cape Provincial Heritage Resources Authority (ECPHRA) for other heritage resources.

On Page 48, under Table 8.3, The Performance Monitoring Plan outlines the considerations for heritage under point 1 of the Socio-Economic section. These considerations seem reasonable, but again, SAHRA cannot be responsible for installations. SAHRA can however offer support in terms of providing knowledge and editorial input for potential signage and/or buoys/markers. Therefore, this section must be also amended to accurately reflect SAHRA's responsibilities.

The EMP fails to note that there might be undiscovered heritage resources within the Kowie Estuary. A sentence must be added that speaks to section 35(3) of the National Heritage Resources Act No. 25 of 1999 (NHRA) that mentions that, if a MUCH resource is discovered, that this must be reported to SAHRA immediately. A suitable place for this would be as part of the zonation plan, as this then acts as a guideline for users of the space as well as decision makers.

DEVELOPMENT OF AN ESTUARINE MANAGEMENT PLAN FOR THE KOWIE ESTUARY

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Ruan Brand
Tel: 0214628672
Email: RBrand@sahra.org.za
CaseID: 17888

Date: Tuesday October 04, 2022
Page No: 3

SAHRA looks forward to seeing the Final EMP with these amendments included. Please note that all updates and/or changes to the project, supporting documentation, correspondence, reports, or any other work relating to the project must be uploaded to the case on SAHRIS to provide SAHRA with the opportunity to comment. SAHRA does not accept emailed documents or hard-copy documents received via post.

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

Yours faithfully

Ruan Brand
Heritage Officer
South African Heritage Resources Agency

Lesa la Grange
Manager: Maritime and Underwater Cultural Heritage
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/592144>

[Terms & Conditions:](#)

DEVELOPMENT OF AN ESTUARINE MANAGEMENT PLAN FOR THE KOWIE ESTUARY

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Ruan Brand
Tel: 0214628672
Email: RBrand@sahra.org.za
CaseID: 17888

Date: Tuesday October 04, 2022
Page No: 4

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 SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.