

**Our Ref:**



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

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Date: Monday August 22, 2022

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## **Final Comment**

### **In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: ACER (Africa) Environmental Management Consultants

Suites 5 & 6, Golden Penny Centre  
26 Hely Hutchinson Street, Mtunzini  
KwaZulu-Natal, 386

**MBB Consulting Services (Eastern Cape) (MBB) was appointed by the Department Forestry, Fisheries and the Environment (DFFE), through their Environmental Protection and Infrastructure Programmes (EPIP) – Working for the Coast (Eastern Cape) (Project Funders), to facilitate the refurbishment and construction of coastal infrastructure at Coffee Bay and Hole in the Wall on behalf of the King Sabata Dalindyebo Local Municipality (KSDLM) (Project Applicant), Eastern Cape. ACER (Africa) Environmental Consultants (ACER) was appointed as Environmental Assessment Practitioner (EAP) to take responsibility for obtaining the relevant Environmental Authorisations (EA) and Water Use Licenses (WUL) for the proposed developments. The proposed development involves the refurbishment and construction of coastal infrastructure near Hole in the Wall, with the key objective being the promotion and development of sustainable coastal infrastructure. The proposed development will formalise coastal accessibility and coastal access whilst promoting and preserving the ecological integrity of the receiving environment.**

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Final Basic Assessment Report (FBAR) as part of Section 38(8) of the National Heritage Resources Act (no. 25 of 1999) for the project 'Proposed Refurbishment and Construction of Coastal Infrastructure Within the King Sabata Dalindyebo Local Municipality, Hole in the Wall, Eastern Cape.'

SAHRA issued a comment on the Draft Basic Assessment Report (DBAR) on the 11<sup>th</sup> of April 2022, stating that the FBAR must detail the public participation process to show how concerns with the local community were addressed so that the living heritage associated with Hole in the Wall is safeguarded, as was originally suggested in the Heritage Impact Assessment (HIA). Although the FBAR does not explicitly state how this was achieved, it does allude to several meetings and site visits that were held, that involved the local community, wherein no concerns relating to the living heritage associated with the Hole in the Wall were raised. Although no impacts to living heritage were identified through these consultations, there is still a possibility that impacts may nonetheless exist. SAHRA's comment was also noted on the Comments and Responses Report (CRR)

# Proposed Refurbishment and Construction of Coastal Infrastructure Within the King Sabata Dalindyebo Local Municipality, Hole in the Wall, Eastern Cape

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and the response mentions that the intangible heritage aspects of the Hole in the Wall will be safeguarded during construction activities and that the 'sense of place' is being maintained as part of the development.

As no concerns about the impacts to living heritage at the Hole in the Wall associated with this development were raised during the public participation process, SAHRA therefore has no objections to this development. If any concerns are raised about adverse impacts to living heritage as a result of either the construction activities or potential future activities arising from this development, these must be recorded and SAHRA must be notified to advise on the way forward. SAHRA may advise that such impacts must be avoided.

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

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Ruan Brand  
Heritage Officer  
South African Heritage Resources Agency

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

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## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/595345>

## Terms & Conditions:

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.