



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 12248

Date: Thursday March 22, 2018
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Final Comment

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

Attention: Mr Evan Mitchell

The sea wall located in front of the Salt Rock Hotel, on the Kwa-ZuluNatal (KZN) north coast was significantly damaged following the high sea and storm event experience along the KZN coast in March 2007. Salt Rock Beach Estates cc (the Applicant) received Environmental Authorisation (EA) for the reconstruction of the sea wall in November 2013 (Ref: DC29/0040/08). While the EA authorises the relevant listed activities to reconstruct damaged sections of the sea wall and reinforce the existing wall, the description of the listed activities only dealt with the reconstruction of the new portions the wall. It is the Applicant's submission that the EA should have been amended in terms of regulation 31 of the Environmental Impact Assessment Regulations, 2014 as the proposed amendments relate to activities that have already been authorised and the changes are intrinsically linked to the development authorised in the EA. This is supported by the coastal engineer who confirmed that reinforcing existing portions of the sea wall will not change the impact significance ratings for impacts as assessed in the Environmental Impact Assessment. The significance of the impacts assessed in the Environmental Impact Assessment would therefore remain unchanged.

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Basic Assessment Report for the proposed Reinforcement of Salt Rock Sea Wall, KZN. The land based aspect of the project falls under the remit of Amafa and has already been commented on and as such will not be addressed here. The Maritime and Underwater Heritage Unit were asked to comment on the application by Amafa as part of the application area falls within the intertidal zone.

In terms of the National Heritage Resources Act, no 25 of 1999 (NHRA), heritage resources, including maritime and underwater cultural heritage sites older than 60 years fall under the protection of the act. Section 34 of the NHRA, states that these sites may not be disturbed without a permit from the relevant heritage resources authority.

The Heritage Impact Assessment provided as part of the Draft Basic Assessment Report states that the seawalls are thought to have been built in the early 20th century and are therefore older than 60 years of age. A permit is therefore required from the relevant heritage authority before any activities can take place. The comment provided by Amafa recommended that a permit to work on the wall should be applied for from their

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Built Environment Section, this is awaiting formal application. Please note that since the seawalls are partly situated below the high water mark, a case officer from the Maritime and Underwater Cultural Heritage unit must also be assigned to the permit application case in order to provide input if necessary.

The recommended management and mitigation activities contained in HIA are supported by SAHRA and as such there are no objections to the proposed project. These management measures must be adhered to in order to mitigate any threat to heritage resources.

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

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/488446>
(EDTEA, Ref: DC29/0023/2017)

Terms & Conditions:

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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.