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**HERITAGE IMPACT ASSESSMENT:
PROPOSED RECONSTRUCTION OF THE SEAWALL IN FRONT OF THE
SALT ROCK HOTEL, SALT ROCK, KZN NORTH COAST.**

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EXECUTIVE SUMMARY

The owners of the Salt Rock Hotel, KZN North Coast, wishes to replace the existing sea wall in front of the Hotel, which was badly damaged during exceptionally high spring tides, with something more effective. The existing sea wall is presumably older than 60 years of age and as such protected by Provincial and National Heritage Legislation. Kerry Seppings Environmental was appointed independent Environmental Assessor while Albert van Jaarsveld was appointed to carry out a Heritage Impact Assessment to comply with the relevant Legislation.

A survey was carried out on 12 March 2010 following a desktop survey. A single potsherd on the beach indicate that the coastal dunes must have formerly been inhabited by Early Iron Age man, as it is a known fact that such communities did exist at Salt Rock. The presence of brown mussel (*Perna perna*) colonies is a further indication. The remains of such villages would have been destroyed during construction of the Hotel and terracing of surfaces.

The existing sea wall has little (if any) historical or architectural value. However, due to its age, the owners will have to apply for a demolition permit from Amafa. It is recommended that the existing tidal pools be retained and that care be taken not to damage these during construction. Any potsherds found on the beach during construction should be collected following a permit being issued.

1. INTRODUCTION / BACKGROUND

The Natal North Coast has over the past couple of years suffered from extreme erosion with accompanying damage as a result of unusual high seas during spring tides, caused by the position of the moon and planets. Several houses in Ballito and Salt Rock had to be demolished due to the damage caused by this.

Currently a stone wall is partially protecting the land on the seaview side of Salt Rock Hotel, which had been terraced. Tidal pools also exist (see photographs) which also offers some protection. This protection is, however, not adequate. The stone wall was damaged during recent high tides and in certain sections destroyed completely.

The owner of the Salt Rock Hotel wishes to replace the partially destroyed wall by something more effective. In terms of National Environmental Legislation in South Africa (Act No 107 of 1998) this is a listed activity and an EIA has to be undertaken for the above development. Heritage Legislation (see section 3, section 34 (1) of the National Heritage Act) also stipulates that “No person may alter or demolish any structure or part of a structure which is older than sixty years without a permit issued by the provincial heritage authority”.

Kerry Seppings Environmental was appointed to do an EIA, while Albert van Jaarsveld was sub-contracted to do a Heritage Impact Assessment in order to comply with Provincial and National Heritage Legislation.

2. DETAILS OF CONSULTANT AND ABILITY TO PERFORM THE SERVICE

Albert van Jaarsveld is currently Acting HOD of the Dept of History, University of Zululand. He obtained the degrees BA and BA (Hons) (Archaeology and History) cum laude from the University of Pretoria. He also has a Masters in History from Rhodes University (1986). He is a member of several professional societies, including the SA Archaeological society (SAAS), Association of Southern African Professional Archaeologists (ASAPA – cultural resources management section) and South African Historical Society (SAHS) and an AMAFA credited Cultural Heritage Resources practitioner. He is the author of several scientific publications (books and articles) and has completed about 120

Heritage Impact Assessments in several provinces for several companies and institutions over the past five years, including major power transmission lines (such as Perseus-Hydra 765kv, Arcus Gibb). His detailed CV is available on request.

Field assistant Bruce Hopwood holds two BA (Hons) degrees from the Universities of Rhodes and Stellenbosch and is an experienced field worker, having been involved in most projects referred to above.

3. HERITAGE LEGISLATION IN SOUTH AFRICA

Cultural heritage resources can broadly be defined as “physical features, both natural and man-made, associated with human activity”. South African heritage legislation stretches further than the restricted definition above by also including invisible and intangible beliefs, ideas and oral traditions, which are regarded as important as physical cultural objects. Also included are fossils and meteorite sites. Heritage resources reflected in South African heritage legislation (Act No 25 of 1999) include the following:

- a) Places, buildings, structures and equipment;
- b) Places to which oral traditions are attached or which are associated with living heritage;
- c) Historical settlements and townscapes;
- d) Landscapes and natural features;
- e) Geological sites of scientific or cultural importance;
- f) Archaeological and palaeontological sites;
- g) Graves and burial grounds, including –
 - (i) Ancestral graves,
 - (ii) Royal graves and graves of traditional leaders,
 - (iii) Graves of victims of conflict,
 - (iv) Graves of important individuals,
 - (v) Historical graves and cemeteries older than 60 years, and
 - (vi) Other human remains, which are not covered under the Human Tissues Act, 1983 (Act No. 65 of 1983 as amended);
- h) Sites of significance relating to the history of slavery in South Africa;

- i) Movable objects, including –
 - (i) Objects recovered from the soil or waters of South Africa including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
 - (ii) Ethnographic art and objects;
 - (iii) Military objects;
 - (iv) Objects of decorative art;
 - (v) Objects of fine art;
 - (vi) Objects of scientific or technological interest;
 - (vii) Books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings; and
 - (viii) Any other prescribed categories.

But excluding any object made by a living person.

The above act - section 38 (1) – requires a Heritage Impact Assessment in case of:

- a) The construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- b) The construction of a bridge or similar structure exceeding 50m in length;
- c) Any development or other activity which will change the character of a site
 - (i) Exceeding 5 000m² in extent; or
 - (ii) Involving three or more existing erven or subdivisions thereof; or
 - (iii) Involving three or more erven or subdivisions thereof which have been consolidated within the past five years; or
- d) The costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
- e) The re-zoning of a site exceeding 10 000m² in extent; or
- f) Any other category of development provided for in regulations by SAHRA or a provincial resources authority.

SAHRA (South African Heritage Resources Agency) requires sufficient information about identified heritage sites to enable it to assess with confidence:

- a) Whether or not it has objections to a development
- b) What the conditions are upon which such development might proceed
- c) Which sites require permits for mitigation or destruction
- d) Which sites require mitigation and what this should comprise
- e) Whether sites must be conserved and what alternatives can be proposed that may re-locate the development in such a way as to conserve other sites, for example, by incorporating them in a wilderness area, or under a parking space; and
- f) What measures should/can be put in place to protect the sites that should be conserved.

While grading (field rating or field significance) is actually the responsibility of the heritage resources authorities, all reports should include Field Ratings for the sites, to comply with Section 38 of the legislation, for example:

- National: Grade I significance e.g. resources such as the Castle in Cape Town (non-movable and no-go areas for any developer)
- Provincial: Grade II significance such as Later Stone Age engravings and paintings (non-movable and to be avoided as no-go areas)
- Local: Grade III A significance; where mitigation is not advised and the site should be retained as a heritage site of high significance
- Local: Grade III B significance; where a section of a site should be mitigated and part should be retained as a heritage site (high significance)
- Generally Protected A: where sites should be mitigated before destruction (generally high/medium significance)
- Generally Protected B: sites of medium significance that should be mitigated before development
- Generally Protected C: sites sufficiently recorded before development/construction (low significance)

Other sections of the Act with relevance are: 34 (1) No person may alter or demolish any structure or part of a structure which is older than sixty years without a permit issued by the relevant provincial heritage resources authority.

(2) Within three months of the refusal of the provincial heritage authority to issue a permit, consideration must be given to the protection of the place concerned in terms of one of the formal designations provided for in Part 1 of this Chapter.

(3) The provincial heritage resources authority may at its discretion, by notice in the Provincial Gazette, make an exemption from the requirements of subsection (1) within a defined geographical area, or for certain defined categories of site within a defined geographical area, provided that it is satisfied that heritage resources falling into the defined area or category have been identified and are adequately provided for in terms of the provisions of part 1 of this Chapter.

(4) Should the provincial heritage resources authority believe it to be necessary it may, following a three-month notice period published in the Provincial Gazette, withdraw or amend a notice under subsections (3).

The above legislation aims to promote and protect South Africa's rich cultural heritage so that future generations may bequeath this unique and precious aspect of our heritage to following generations.

4. STUDY APPROACH / METHOD

A field survey was undertaken on Friday 12 March 2010. The beach area and adjacent land on which the hotel was developed was duly inspected and photographed. Co-ordinates were taken by a six mega pixel Sony Cybershot camera.

5. LOCATION

The Salt Rock Hotel is situated on Lot 900 Salt Rock (59 Basil Hulett Drive) at S29° 30' 13,78" and E 31° 14' 18,12". (see KZN 1:50 000 mapsheet, 2931CA).

6. RESULT OF SURVEY

a) THE STONE AGE

No evidence of the Stone Age culture was observed during the survey.

b) THE IRON AGE

The Iron Age is associated with Africans and commenced early in the first millennium when food producing communities introduced pottery and metallurgy into South African and KZN's inland and coastal lowland areas. The Natal Coast housed several Early Iron Age communities. Early Iron Age communities have often lived very close to the beach, eg. Salt Rock, Umhlanga Rocks, etc. Shell middens are a common feature in or up against the dune vegetation of the beaches. The main constituent of the middens is shell of the brown mussel *Perna Perna*. Colonies grow on rocks on the beach, as at the Salt Rock Hotel.

A single potsherd was found on the beach south of the proposed seawall. It is reddish in colour and undecorated, which makes dating problematic, however it is presumed to be from the Early Iron Age as later Iron Age communities have seldom settled close to the beach. No other material relating to the Iron Age was observed.

c) EXISTING SEA WALL AND TIDAL POOLS

The existing damaged sea wall was built from stone and mortar in the early 20th century. The tidal pools presumably date from the same time. As such, these structures are protected by Heritage Legislation and may not be destroyed or altered without obtaining the necessary permit from the appropriate authorities.

7. IMPACT DESCRIPTIONS AND ASSESSMENT

The erection of a new seawall in front of the Salt Rock Hotel will have a permanent impact on the environment. The wall will probably be of concrete, which will require foundation trenches. The existing wall will have to be demolished. The new wall should have no impact on the existing tidal pools and the latter could be retained.

Any Early Iron Age site that might have occurred would have been situated in former coastal dunes. These would have been destroyed during the construction of the Salt Rock Hotel and the terraces on the seaside of the Hotel.

The existing seawall was constructed of stone and mortar and is of no historical or architectural significance. Destruction of this wall will have no impact on KZN's cultural heritage.

8. RECOMMENDED MANAGEMENT / MITIGATION ACTIVITIES

It is suggested that a permit be obtained for the destruction of the existing seawall. This permit should be applied to with AMAFA aKwaZulu/Natali (contact details on front cover), Built up Environmental Section.

It is recommended that the existing tidal pools be retained and while the new wall is constructed, care should be taken that these structures are not damaged.

During the process of foundation trenches being dug for the wall, any potsherds surfacing should be collected and deposited with AMAFA.

9. CONCLUSION

Demolition of the existing sea wall will be no threat to KZN's Cultural Heritage, as it has little cultural/ historical (if any) or architectural value.

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11. PHOTOGRAPHS



Salt Rock Hotel



First dunes – Northern side

S 29° 30' 12,1"

E 31° 14' 20,0"



Existing sea wall



Existing sea wall



Perna Perna mussel colonies on rocks.



Existing tidal pool.

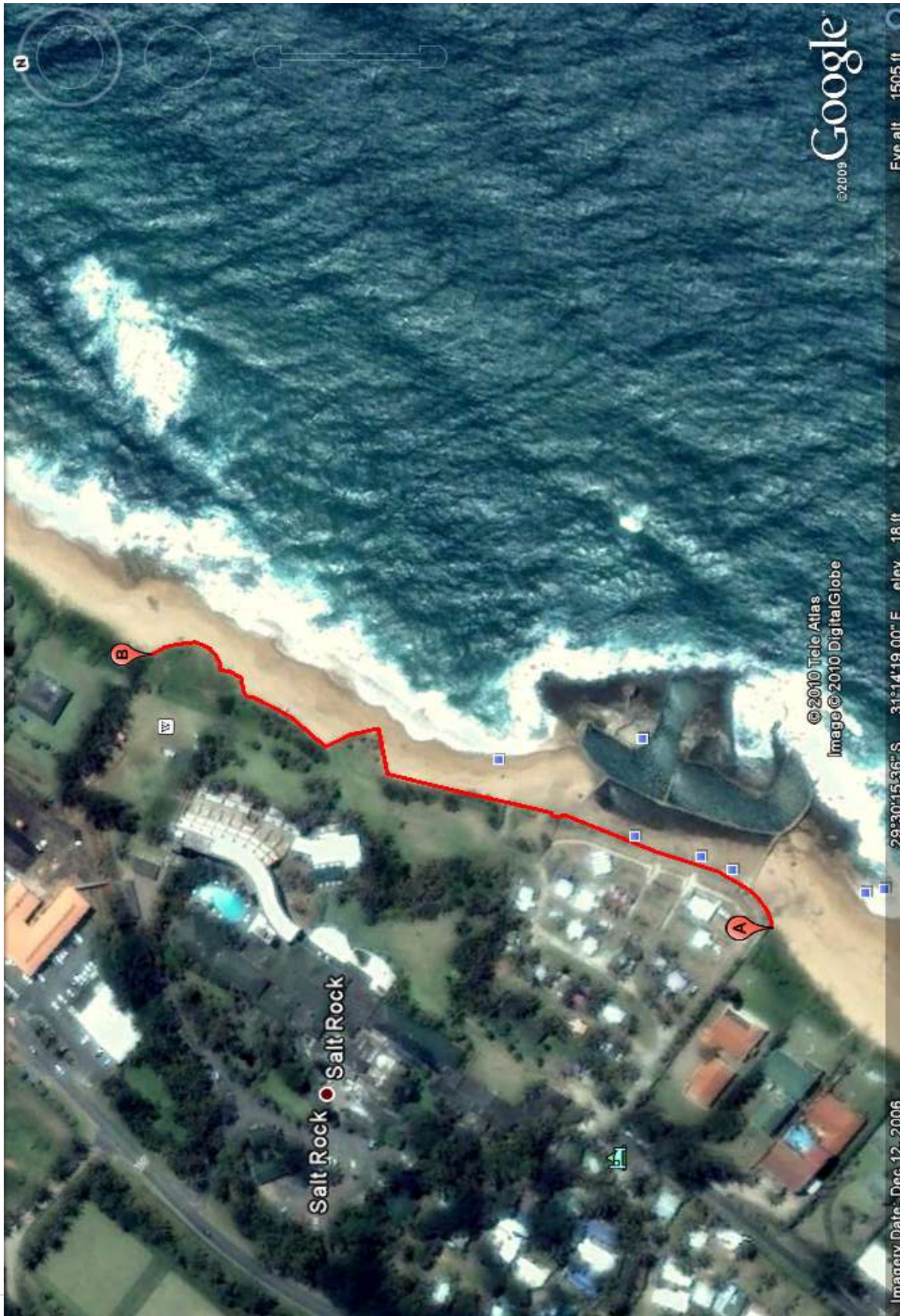


Potshard on beach – southern side of proposed wall.



Potshard on beach – southern side of proposed wall.

12. MAP



13. DECLARATION OF INDEPENDENCE

SPECIALIST REPORT DETAILS

This report has been prepared as per the requirements of Section 33 of GNT 385 – Environmental Impact Assessment Regulations and the National Environmental Management Act (Act No. 107 of 1998)

Report prepared by: *Albert van Jaarsveld*

Expertise/Field of Study: *Heritage*

I, *F.A. van Jaarsveld*, declare that this report has been prepared independently of any influence or prejudice as may be specified by the Department of Agriculture and Environmental affairs.

Signed:



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