



Amafa aKwazulu-Natali
195 Jabu Ndlovu Street Pietermaritzburg 3200 August
Telephone 033 3946 543
bernadetp@amafapmb.co.za

08 July 2015

Attention Bernadet Pawandiwa

Dear Ms Pawandiwa

**Application for Exemption from a Phase 1 Heritage Impact Assessment
Proposed Redevelopment of the St Lucia Precinct
Isimangaliso Wetland Park
Mtubatuba Local Municipality, KwaZulu-Natal**

Project description¹

The proposed redevelopment and rehabilitation of the St Lucia Precinct comprises the main public recreation node at St Lucia, from Main Beach in the north to Estuary Beach in the south. In addition, the proposed St Lucia Precinct Plan includes a number of developments and rehabilitation measures along the St Lucia Estuary from the estuary mouth to the Siyabonga Centre near the bridge used to access the town of St Lucia. Access into St Lucia is along the R618 which links St Lucia to the town of Mtubatuba. All the areas included in the proposed redevelopment and rehabilitation of the St Lucia Precinct can be easily accessed from existing roads and trails in and around the town of St Lucia (Figure 1).

The sensitive and dynamic dune system within the public recreation node of St Lucia, from Main Beach in the north to Estuary Beach in the south, is currently showing signs of dune erosion and increased sand blowouts, which poses a threat to the ecological functioning of the primary dune belt, north-south connectivity within the coastal corridor and the structural integrity of infrastructure in these areas. Much of the infrastructure within the St Lucia beach nodes, constructed in the 1970s, was, in hindsight, inappropriately positioned and the area was planted with casuarinas (*Casuarina equisetifolia*) to aid in dune stabilisation. Apart from inappropriate positioning, the infrastructure is now outdated and does not cater adequately for visitors to St Lucia or conform to iSimangaliso's adopted branding and architectural designs.

In order to reduce impacts on the sensitive primary dunes, iSimangaliso is proposing to realign existing infrastructure in order to create focus areas, which will cater for the various user groups making use of the St Lucia beaches while, at the same time, limiting anthropogenic impacts on the primary dunes. Casuarinas will be removed from the primary dune and the area rehabilitated with the aim of re-establishing the natural functioning of the dune system. Techniques will include using local indigenous plant species where appropriate, along with brush packing and screening.

¹ Information provide by ACER (Africa) Environmental Consultants

In addition to the proposed developments and rehabilitation measures to be undertaken near the St Lucia beaches, the proposed St Lucia Precinct Plan also includes a number of developments and rehabilitation measures along the St Lucia Estuary from the estuary mouth to the Siyabonga Centre near the bridge used to access the town of St Lucia. These developments are aimed at aiding in the rehabilitation and restoration of disturbed areas along the estuary banks, while simultaneously relieving congestion within this area by providing focus areas for infrastructure and the movement of visitors.

Details of the proposed redevelopment within the St Lucia Precinct, as shown in Figure 1, are provided in Appendix 1.

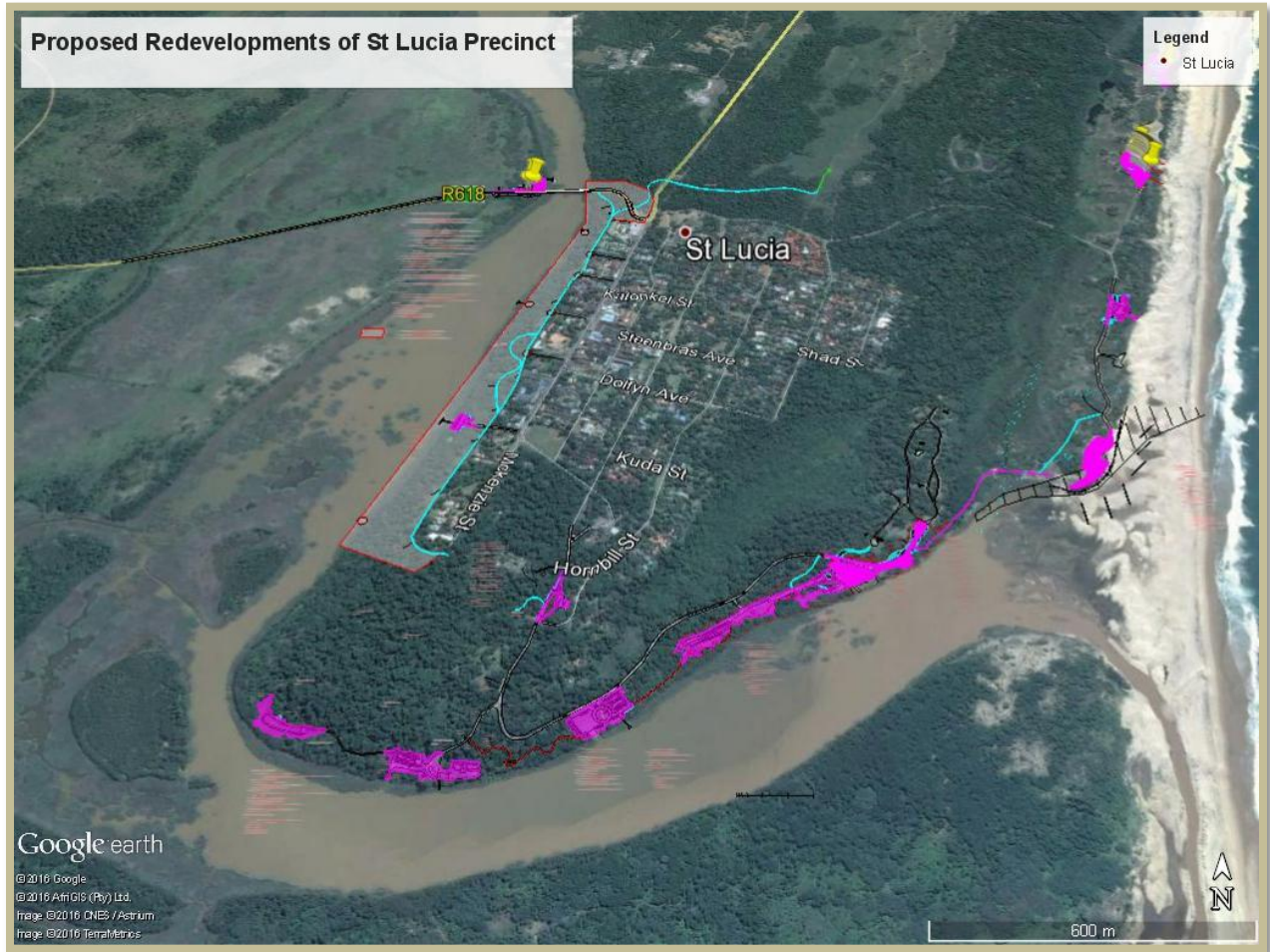


FIGURE 1

In terms of the amended EIA Regulations published under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended, the proposed redevelopment of the St Lucia Precinct triggers a number of listed activities in terms Listing Notice 1 (No. R. 983 of Dec 2014), and Listing Notice 3 (No. R. 985 of Dec 2014), in terms of section 24(2) and 24D of the National Environmental Management Act, 1998, which require environmental authorisation via the undertaking of a Basic Assessment.

Cultural and Historical Context of the St Lucia Precinct

St. Lucia was first named in 1554 as *Rio dos Medos do Ouro* (alternatively *Rio dos Médãos do Ouro* — *River of the Gold Dunes*) by the survivors of the Portuguese ship São Bento. To mariners of the time the Tugela River mouth was known as St. Lucia. In 1575, Manuel Peresterello, a Portuguese cartographer and explorer named the Tugela River and on the 13th December 1575, the day of the feast of Saint Lucy, renamed the mouth area of the Estuary to Santa Lucia.

Prior to European settlement the area around the Lake shores was inhabited by Thonga and Zulu speaking Nguni clans, who herded cattle and cultivated the land. Archaeological evidence attests to the presence of black farming communities around the Lake since the beginning of the 1st Millennium AD.

In 1822, a British survey expedition visited the area and proclaimed a township on the land at the Estuary mouth. One of the survey vessels was the H.M.S. Leven under the command of Lieutenant Vidal. Cape Vidal and Leven Point, to the north of the Lake, were then named. However, no settlement took place. During the 1880s the British government annexed St Lucia in a move to foil the Boers from the New Republic in their search for access to the sea. It was after this that land was distributed to settlers and that missions were founded at Mount Tabor, Cape Vidal and Ozabeni, to the north of St Lucia. Mission Rocks was named after the establishment of a Catholic Mission in 1888 on the Eastern Shores, 10 km north of the Estuary mouth.

Professional hunters began visiting the lake in the 1850s in search of ivory, hides and horns which were at one point the Colony of Natal's main source of income. So successful were these hunters that within 50 years the last elephant in this region had been shot out. In recognition of this decimation of wildlife the Colonial authorities established the St Lucia Nature Reserve in 1895 and together with Mfolozi- Hluhluwe these were proclaimed in 1897; the first proclaimed conservation areas in Colonial Africa ².

During WW11 the southern part of the Lake was used as a base for Catalina flying boats that patrolled the Indian Ocean to thwart the threat of U-boats on ship convoys moving to the Western Front. This was abandoned after the war³.

From the 1950's St Lucia grew as a fisherman's mecca, particularly renowned for the annual grunter and salmon run. To this end the then Natal Parks Board established the St Lucia Bait Prawn Fishery, primarily to supply the fishing fraternity. This operated for 45 years until officially closed in the 1990's.⁴

The existing formal town consists of a registered general plan⁵ which is totally surrounded by the Isimangaliso Wetlands Park, proclaimed in terms of the World Heritage Act 1999. St Lucia is effectively an eco-tourism node given its location within Isimangaliso Wetlands Park with its dominance of tourism related activities. These include tourist accommodation, activities and products, with the surrounding natural environment being the key attractions. St Lucia is the primary gateway and entry point to the Park and with additional recreational access to the beach area and estuary flanking the town.

Site assessment and recommendations

eThembeni staff participated in a site inspection and survey of the proposed development areas on 04 and 05 May 2016. The following observations are pertinent:

² http://www.stluciasa.co.za/sl_history.htm

³ Jeff Gaisford . World War Two Flying-boats over the Zululand Coast. *Natalia* 41 (2011), pp. 34 – 39. Natal Society Foundation.

⁴ Ecology and Conservation of Estuarine Ecosystems: Lake St Lucia as a global model. Renzo Perissinotto, Derek D. Stretch, Ricky H. Taylor, Richard Hilton Taylor (eds).Cambridge University Press. 2013.

⁵ Declared a township in terms of the provincial Town and Regional Planning Act of 1949 (as amended). =380 erven.

1. The proposed beach nodes' upgrades and road realignments occur within the dune slack of the foreshore tertiary dune line. The area is subject to episodic inundation when water levels rise in the marshlands situated along the dune slack. In the recent past the area has also been observed to have flooded when high water levels in the Estuary have forced northwards prior to the mouth breaching into the ocean. The attendant shoreline is a sandy beach, the closest rocky shoreline occurring some 7-8 kilometres to the north (First Rocks). Consequently, during the Iron Age, these beach nodes would have been eschewed for habitation due to the marshy habitat. No shell middens, as evidence of shellfish exploitation, or homestead residues were observed or are expected to occur.



HYGROPHILOUS GRASSLANDS ADJACENT TO EXISTING BEACH ACCESS



WETLANDS PRONE TO SEASONAL INUNDATION



EXISTING VISITOR INFRASTRUCTURE DUE FOR UPGRADE



FORESHORE DUNES AND CASSURINAS DUE FOR REHABILITATION



EXISTING ROAD DUE FOR REALIGNMENT- DAMAGE DUE TO INUNDATION

FIGURE 2 VIEWS OF THE PROPOSED BEACH NODE AREAS EARMARKED FOR UPGRADING

2. All proposed facilities' upgrades along the estuary shoreline occur within and along existing infrastructure footprints. No archaeological remains are expected as the existing infrastructure footprints are located largely along reclaimed reed beds and foreshore sands at the base of the primary dune that forms the St Lucia peninsular. It is along the higher lying ground of the latter that the township is laid out and has developed since the late 1950's.



ABLUTION FACILITIES AND CASSURINAS DUE FOR REMOVAL AND REHAB



BOARD WALKS AND JETTY DUE FOR UPGRADE



ESTUARY-EDGE VISITOR FACILITIES DUE FOR UPGRADING



3. Whilst the Isimangaliso Wetland Park is renowned for its Cretaceous and Tertiary fossil record⁶ these deposits are largely exposed in the north of the Lake system (False Bay and the Nibela Peninsular)⁷. However, an exposed Cretaceous fossiliferous deposit is described from a deep stratigraphic incision at the junction of the old course of the Mfolozi River, the present course of the river, and the unnamed stream draining south of Lake Mfuthululu⁸; this indicating the

⁶ Muad R.R. The Climate and Geology of Maputaland. In. Studies on the Ecology of Maputaland (eds) Bruton M.N. and Cooper K.H. Rhodes University. 1980.

⁷ Groenewald, G. 2012. Palaeontological Technical Report for KwaZulu-Natal. Metsi Metseng Geological and Environmental Services.

⁸ Kennedy, W.J. & Klinger, H.C. 1975. Cretaceous faunas from Zululand and Natal, South Africa. Introduction, stratigraphy. Bulletin of the British Museum (Natural History) Geology 25, 263–315.

proximity of fossiliferous deposits to the immediate St Lucia area. However, the estuary edge comprises Pleistocene and Recent wind-blown sand deposits that have given rise to the characteristic dune topography of the area and overlay the Cretaceous and Tertiary deposits to the order of 20-30 m. Dredging of the Estuary mouth from 1952 to the late 1990's yielded no fossil remains from the deep alluvium overlying the fossiliferous Cretaceous and Tertiary deposits below. Consequently no impact on fossil bearing strata is envisaged in the course of the proposed upgrades and developments.

Accordingly, we request that Amafa grant an exemption from an HIA for these activities, allowing the project to proceed with no further heritage resource mitigation.

In this regard, please can you notify us timeously via the loaded SAHRIS case file as to the decision of Amafa.

Yours sincerely



Len van Schalkwyk
Principle Investigator.

Appendix 1

The proposed redevelopment within the St Lucia Precinct will include the following project components:

1. Projects adjacent to the St Lucia beaches

Estuary Beach

- Removal of existing toilet block
- Removal of casuarinas and rehabilitation of the primary dunes

Ingwe Beach

- Removal of casuarinas and rehabilitation of the primary dunes.
- Formalise parking areas for vehicles and boats.
- Upgrading of ablution facilities.
- Landscaping of lawned areas and provision of Park infrastructure (litter bins, etc.).
- Provision of a formalized beach access ramp for boats.

Jabula Beach

- Removal of casuarinas and rehabilitation of the primary dunes.
- Demolition of existing ablution facilities and provision of new ablution facilities.
- Remove vehicle access through to MAIN Beach but allow for pedestrian access.

Main Beach

- removal of casuarinas and rehabilitation of the primary dunes.
- Upgrading of ablution facilities.
- Landscaping of lawned areas and provision of Park infrastructure (litter bins, etc.).
- Remove vehicle access through to JABULA Beach – allow pedestrian access –and rehabilitation of these areas.
-

2. Projects along the St Lucia Estuary

Boardwalk Beach

- Extend the current boardwalk.
- Construction of new ablution facilities.
- Construction of a meet and greet zone, and paving of surfaces.
- Extension of the parking area.
- Realignment of the caravan park fence line.
- Create a formalised area for informal traders.

Ski-Boat Club Facilities

- Upgrade the Ski-Boat Club building to conform to iSimangaliso's branding and improve aesthetics.
- Removal of the concrete fence and replacement with alternative suitable fencing.
- Provision of additional parking to the west of the Ski-Boat Club.
- Rehabilitation of disturbed areas.
- Erection of Park signage.

Estuary Park

- Upgrade of ablution facilities.
- Provision of additional parking (10 vehicle and boat parking bays).
- Formalisation of the pedestrian trail and provision of signage.
- Provision of Park infrastructure (bins, picnic tables, etc.).

Sugar Loaf Jetty

- Formalisation of the pedestrian trail and provision of signage.
- Provision of traffic calming speed bumps on the access road.
- Installation of bollards to restrict vehicle access into natural areas.
- Provision of Park signage.

Honeymoon Bend

- Demolish existing boat house and wash bay. This area is to be rehabilitated.
- Provide additional lawned picnic areas.
- Upgrade existing ablution facilities.
- Construction of additional ablution facilities.
- Construction of access roads to link infrastructure at Honeymoon Bend (gravel roads less than 4 m in width).
- Provision of Park signage.

Sunset Jetty

- Provision of Park signage.
- Provision of additional parking including two bus parking bays.
- Formalise areas for informal and formal traders.
- Provision of a turning circle for vehicles and busses.
- Upgrade of ablution facilities and provision of additional toilet facilities for disabled visitors.

Entrance to Igwalagwala Trail, Parking, Ablutions & Swing Boom

- Construction of a new access road to access staff housing.
- Construction of a road island to accommodate future access control infrastructure (guard hut and control booms).
- Provision of additional parking for vehicles and busses.
- Provision of an ablution facility.
- Provision of Park signage.
- Provision of an additional lane to accommodate large boats and trailers.
-

3. Projects adjacent to the St Lucia Estuary

Swing Boom Point

iSimangaliso – Estuary View Boardwalk

- Construction of a 1.5 m wide concrete walkway from the entrance of St Lucia to Honeymoon Bend along the estuary.
- Provide links from the boardwalk to the Siyabonga Centre and the St Lucia town centre.
- Provision of a formalised craft market near the Siyabonga Centre for informal traders.

- Construction of a 1.5 m wide concrete walkway from the Siyabonga Centre to the Dukuduku Gate.

Swing Boom Controls – Beach Road

- Construction of an access control point to control visitor numbers during peak tourism periods. The control point will consist of a guard house and access control booms.

iSimangaliso South Hiking Trails Network

- Extension of current trails to link with the proposed Estuary View Boardwalk.
- Introduce new natural trails
- Introduce Park signage.
- Introduce benches and bins

New Pathway Leading to Town

- Introduce pedestrian pathway into town up to Dukuduku Gate