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10 March 2020

Attention Bernadet Pawandiwa

Heritage Scoping Report

**Blythedale Coastal Estate
Dolphin Coast
Dukuza Local Municipality, Ilembe District Municipality
KwaZulu-Natal**

Prelude: eThembeni Cultural Heritage was appointed by Guy Nicholson Consulting in **2005** to conduct an Archaeological Impact Assessment of the proposed Blythedale Coastal Estate development in terms of the KwaZulu-Natal Heritage Act, No. 10 of 1997.

This Phase 1 Report, as submitted to *Amafa aKwaZulu-Natali*, is no longer in eThembeni's archive, having been lost with all other documentation in a computer hard-drive crash predating 2010. Hard copy archival material from 2005 is not stored at the Amafa Heritage and Research Institute and has proven vexing to access¹.

An update and verification of validity of the findings of this report are required by the developers, the Elan Property Group, for submission to the KwaDukuza Municipality. A heritage report, and Amafa's Final Comment, are the last outstanding documentation required by the municipality in terms of the DFA Judgement (Development Approvals),² inception in November 2006 and finalised in January 2019.³

Section C – Conditions of Establishment, Pt.4 states:

4. KwaZulu-Natal Heritage Act of 1997:

'The archaeological mitigation as identified within the Archaeological Report and authorised by Amafa, shall be carried out to the satisfaction of Amafa before construction commences and during construction.'

¹ Personal communication: Ms. Ros Devereaux to Mr. Cobus Naude (Elan Property Group) February 2020.

² See Tribunal Development Approvals as uploaded to the SAHRIS Case File.

³ The consequence of protracted land-legal and land restitution negotiations and equity settlements finalised in 2014.

In the absence of the original report and trying to recall survey details of 15 years prior, the Elan Group have appointed eThembeni CHM to revisit the original survey. A field inspection by eThembeni staff was conducted on 03 March 2020 on the two inception phase areas of the proposed development. Further survey and monitoring of the entire envisaged scheme is discussed further under **Mitigation and Management** below.

Project Area and Project description ⁴

The Blythedale Coastal Estate is an envisaged R16 billion development project when complete. Spanning 982 hectares of previous agricultural land, coastal forest, rivers and estuaries on the Indian Ocean coast, the Estate is located on the Dolphin Coast north of Durban between the coastal resort of Blythedale in the south and the Prince's Grant Golf Estate in the north (see Figure 1). The development precinct falls under the jurisdiction of the KwaDukaza Local Municipality.

The project comprises 7 nodes to be developed in 7 phases according to the approved plan in terms of in terms of the DFA Judgement (Development Approvals).⁵

These nodes comprise:

- A Beach Resort
- Ocean Residences
- Forest Residences
- Golf Residences
- Equestrian Residences
- Hilltop Residences
- A Retirement Village

The full term of the development with completed infrastructure is projected to be 8 years.



Figure 1. Aerial view of the the proposed Blythedale Coastal Development precinct.

⁴ Information provided by the Elan Property Group. See BID and Prospectus loaded to SAHRIS Case File.

⁵ See Footnote 2. above.

Observations

eThembeni staff inspected the site on 03 March 2020. Much of the area planted to sugar cane in 2005 has been augmented with commercial eucalyptus plantations in the last 15 years. Fallow lands have reverted to coastal grassland and thick stands of pioneer bush tick-berry (*Osteospermum / Chrysanthemoides monilifera*).⁶

As has been eThembeni's previously recommended mitigation procedures for like developments in the coastal zone, I recall the same from the 2005 original survey. "That at the time of cutting of the cane a heritage practitioner be appointed to monitor, in particular hilltop locations, for evidence of Iron Age settlement".

Inspection of the two inception phases of development on the Estate yielded a surface collection of pottery, marine shell and upper grindstones at GPS point **29°21'28.95"S 31°20'57.44"E** (see Figs. 2 & 3). These are indicative of Late Iron Age hilltop settlement.

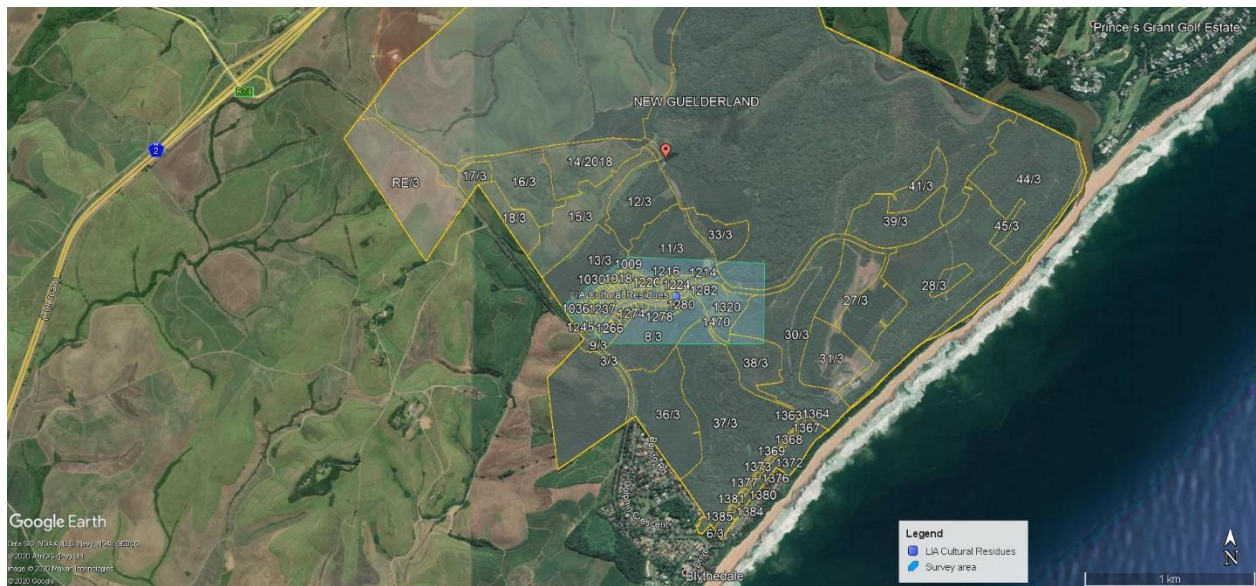


Figure 2. Location of Iron Age residues within the inception areas of development.⁷



Figure 3. Late Iron Age ceramics marine shell (oyster) and upper grindstones.

⁶ <http://pza.sanbi.org/osteospermum-moniliferum>

⁷ See kml. loaded to SAHRIS Case File.

No historical structures were observed during the survey and none were recorded during the 2005 survey.

The underlying lithology comprises Cretaceous Maputaland Group calcarenites, clayey sand, red and grey dune sand, limestone and conglomerate.⁸

These are deeply overlain by Pleistocene Berea Red Dune sands and will not be affected by the proposed development activities. No further palaeontological mitigation is recommended.

Mitigation and Management Recommendations

As recommended in the 2005 report, all phases of the development should be monitored by a heritage practitioner at the onset of earthworks. Specifically, all hilltop locations for Iron Age residues, and any incursion or accesses into the coastal forest along the tertiary coastal dune cordon. The latter to monitor for the presence of highly likely coastal shell middens.

We accordingly request that Amafa:

- allow the two inception phases of the development to proceed with the recommended monitoring of start-up earth works.
- that future phases are monitored at the inception of earthworks by an accredited heritage practitioner.
- any incursion or accesses into the coastal forest along the tertiary coastal dune cordon are monitored by an accredited heritage practitioner to assess for the presence of highly likely coastal shell middens.
- that the protocols in Appendix 1 are made binding to any stipulations issued by Amafa.

Please can you notify us timeously, via the loaded SAHRIS Case File, as to the decision of Amafa in this regard.

Yours sincerely



Len van Schalkwyk
Principle Investigator.

⁸ Ovenchika, M. 2027. Lithostratigraphy of the Zulti South MLA. Report prepared for the CHRMP, Zulti South MLA. eThembeni CHM for Amafa aKwaZulu-Natali. 2012.

Appendix 1

Protocol for the Identification, Protection and Recovery of Heritage Resources During Construction and Operation

It is possible that sub-surface heritage resources could be encountered during the construction phase of this project. The Environmental Control Officer and all other persons responsible for site management and excavation should be aware that indicators of sub-surface sites could include:

- Ash deposits (unnaturally grey appearance of soil compared to the surrounding substrate);
- Bone concentrations, either animal or human;
- Ceramic fragments, including potsherds;
- Stone concentrations that appear to be formally arranged (may indicate the presence of an underlying burial, or represent building/structural remains); and
- Fossilised remains of fauna and flora, including trees.

In the event that such indicator(s) of heritage resources are identified, the following actions should be taken immediately:

- All construction within a radius of at least 20m of the indicator should cease. This distance should be increased at the discretion of supervisory staff if heavy machinery or explosives could cause further disturbance to the suspected heritage resource.
- This area must be marked using clearly visible means, such as barrier tape, and all personnel should be informed that it is a no-go area.
- A guard should be appointed to enforce this no-go area if there is any possibility that it could be violated, whether intentionally or inadvertently, by construction staff or members of the public.
- No measures should be taken to cover up the suspected heritage resource with soil, or to collect any remains such as bone or stone.
- If a heritage practitioner has been appointed to monitor the project, s/he should be contacted and a site inspection arranged as soon as possible.
- If no heritage practitioner has been appointed to monitor the project, the head of archaeology at Amafa's Pietermaritzburg office should be contacted; telephone 033 3946 543.
- The South African Police Services should be notified by an Amafa staff member or an independent heritage practitioner if human remains are identified. No SAPS official may disturb or exhume such remains, whether of recent origin or not.
- All parties concerned should respect the potentially sensitive and confidential nature of the heritage resources, particularly human remains, and refrain from making public statements until a mutually agreed time.
- Any extension of the project beyond its current footprint involving vegetation and/or earth clearance should be subject to prior assessment by a qualified heritage practitioner, taking into account all information gathered during the initial assessment.