

Integrated Metropolitan Environmental Policy (IMEP)

CULTURAL HERITAGE STRATEGY FOR THE CITY OF CAPE TOWN

**CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD**

**Environmental Management Branch:
Heritage Resources Section**

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PICTURES ON FRONT COVER (top to bottom): Gugulethu Seven Memorial unveiling, 21st March 2005; Traditional Khoekhoen house construction, circa 1719; The bakery building at Mamre Mission Station; Victorian toilet detail at the Company's Garden; Cultural Landscape of Stone Pines and the Twelve Apostles from Earl's Dyke; Pass protest march from Langa to Caledon Square, Cape Town in 1960 (Independent Newspapers).

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Table of Contents

1.	Introduction	Page 3
1.1	Document overview	3
1.2	Context	4
1.3	Legislation	4
1.4	Definition and Value of heritage resources	6
1.5	Concept of a "Strategy"	6 - 7
1.6	Meeting the CCT's vision, mission and values	7 - 8
1.7	Historic approach to heritage management	8 - 9
1.8	Proposed integrated approach to heritage management	9
1.9	Integration, support and coordination between IMEP Strategies	9
1.10	Strategy roleplayers	9 – 10
2.	The Strategy	10
2.1	Conceptual Framework	10
2.2	Vision	10 - 11
2.3	Guiding principles for heritage management	11
2.4.	Key strategic principles	11 - 12
2.5	Policies of principle	12 - 17
2.6	Management Structure	17 - 18
2.6.1	Political level	19
2.6.2	Director: Planning and Environment	19
2.6.3	Heritage Working Group (Internal)	19
2.6.4	Heritage Managers/Officials	20
2.6.5	Cape Town Heritage Authorities Task Team (Intergovernmental)	20
3	Implementation	20 – 21
3.1	Strategic Objectives	21
3.2	Monitoring and Review	22 – 23
3.3	Reporting	23
3.4	Budget and Business Planning	23
3.5	Implementation	23
4.	Strategic Management Objectives	25 – 30
5.	Conclusion	30
6.	Glossary and Definitions	30-32
7.	Appendix: Art, Antiques and Memorabilia Collection Management and Maintenance Plan - Supplementary Detailed Implementation Strategy	33-36

1. Introduction

On the 31st October 2001 the City of Cape Town (CCT) formally adopted the first Integrated Metropolitan Environmental Policy (IMEP) along with its implementation strategy, the Integrated Metropolitan Environmental Management Strategy (IMEMS). This IMEMS requires that the CCT develop detailed sectoral strategies to meet the commitments made in the sectoral approaches by giving effect to the environmental principles in IMEP.

Cultural heritage is one of the sectoral approaches of IMEP. The City has committed itself through IMEP to *'ensuring that the diverse cultural heritage of the City of Cape Town is protected and enhanced. This includes:*

- *Recognising the rich cultural history of the City of Cape Town*
- *Recognising all cultures and religions represented within the City of Cape Town*
- *Including cultural values, sites and landscapes of historic significance, areas of scenic beauty and places of spiritual importance in planning and decision-making.'*

The above commitment needs to be further augmented by also ensuring that the diverse cultural heritage of Cape Town is also *conserved*, and that *objects and socio-political dimensions* are expressly also included.

1.1 Document overview

To date there has not been a consolidated and coordinated approach to managing the cultural heritage of the new City of Cape Town.

This document presents the City of Cape Town Cultural Heritage Strategy. The document sets a policy and framework for the management and protection of the cultural heritage resources of the City of Cape Town.

The document also provides a response from the City to the obligations of local government contained in the National Heritage Resources Act. Finally, the document provides a framework for cooperation between the national, provincial and local spheres of government in managing and protecting heritage resources in the City of Cape Town. This document includes:

- The context of cultural heritage in the CCT
- Introduces the concept of "strategy"
- Fifteen Key policy principles
- Presents an institutional framework that will facilitate the effective and efficient implementation and management of the Cultural Heritage Strategy
- Recognises the importance and role of partnerships
- Identifies the (seven) Strategic Objectives of the Cultural Heritage Strategy
- Defines the approach to each of the (seven) Strategic Objectives
- Identifies key performance indicators for the implementation of the strategy as a whole
- Concludes with a mechanism for continual improvement through a cycle of review and revision for the Strategy
- Includes Supplementary Report: Detailed Implementation Strategy, Management and Maintenance Plan for the City Owned heritage objects including the Arts, Antiques and Memorabilia Collection

This Cultural Heritage Strategy, once endorsed by Council, will form the management framework, targets and goals for the integrated management of the City of Cape Town's cultural heritage resources.

1.2 Context

The approved Integrated Metropolitan Environmental policy (IMEP) for the City sets out 14 sectoral approaches, which take the form of commitments. One of these (4.5 of IMEP) is the commitment to Cultural Heritage. Arising out of this sectoral approach, the City is required to develop a detailed policy and implementation strategy for cultural heritage management.

In addition a Report of August 2001 recommended that the Planning and Environmental Directorate establish a working group to co-ordinate a cultural heritage sectoral strategy, including a heritage policy.

The focus was to be on the local authority's responsibilities with regard to heritage management. At present there is no detailed metro-wide heritage policy, the regulatory frameworks are not consistent across the former municipalities and the identification and protection of resources is not equitably distributed across the City.

In April 2002 the Planning and Environment Portfolio Committee decided to focus on the development of a cultural heritage policy to guide heritage-related decisions and heritage management. The draft heritage policy is therefore the first component of the cultural heritage strategy and has guided the formation of the strategy.

In addition the Art, Antiques and Memorabilia Collection Maintenance and Management Plan was initiated by the Executive Committee in December 2001, as a Detailed Implementation Strategy as required by IMEP.

1.3 Legislation

The Constitution of the Republic of South Africa provides the point of departure for heritage legislation and management. It states that everyone:

- has the right to an environment that is not harmful to their well being; and that everyone has the right to have the environment protected for the benefit of present and future generations through reasonable and other legislative measures [Section 24].
- has the right with other members of their community to enjoy their culture, practice their religion and use their language; and form, enjoy and maintain cultural, religious and linguistic associations and other organs of society [Section 31(1)].

The Constitution also binds heritage and other statutory authorities to the notion of cooperative governance. It states:

"In the Republic, government is constituted as national, provincial and local spheres of government which are distinctive, interdependent and interrelated." [Section 40(1)].

Heritage authorities are required by the Constitution to cooperate while at the same time respecting the powers, duties and functions of other statutory authorities, as laid down by law.

At a local government level, statutory functions derive from some zoning schemes and from relevant sections of national legislation, including the provisions of the National Environmental Management Act (NEMA) and the National Heritage Resources Act (NHRA).

In Cape Town, heritage related controls are imposed by sections of the Zoning Scheme (Land Use Planning Ordinance), which requires special consent from Council for alterations to structures in designated heritage areas.

The National Heritage Resources Act (Act 25 of 1999) (**NHRA**) and the Provincial Heritage Ordinance promulgated in terms of the Act, empower local authorities, with conditions, to formulate by-laws for managing local heritage resources, or other higher order heritage resources where a responsibility may be delegated.

The Act provides the legislative mandate for the City of Cape Town to formulate a heritage management policy to identify, assess, protect and enhance its heritage resources. There are numerous sections in the Act which set out what the Local Authority shall, must or may do including powers which can be conferred on a local authority deemed to be competent.

In particular, the following sections (amongst others) of the NHRA apply to heritage management at a local government level.

2.1. Designation and management of heritage areas

Section 26(1)(f): "The responsible Minister may make regulations delegating any of its powers and functions to (f) a local authority which shows competence to perform such functions."

Section 31(1): "A planning authority must at the time of the revision of a town or regional planning scheme, or the compilation or revision of a spatial plan... investigate the need for the designation of heritage areas to protect any place of environmental and cultural interest . . .":

Section 31(5): "A local authority may by notice in the Provincial Gazette, designate any area or land to be a heritage area on the grounds of its environmental and cultural interest, or by the presence of heritage resources" subject to consultation with the Provincial Heritage Authority and the relevant property owners;

Section 31(7): "A local authority (with provisions) must provide for the protection of a heritage area through the provisions of its planning scheme or by-laws under this Act."

Section 34(1): "No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority".

Section 47 requires that heritage resources authority adopt a plan for the management of heritage resources and that all actions of authorities must be consistent with general policies.

2.2. Identification of heritage resources

Section 30(5): "At the time of a compilation of a town or regional planning scheme or a spatial plan, a planning authority shall compile an inventory of the heritage resources which fall within its area of jurisdiction and submit such an inventory to the relevant heritage authority . . ."

2.3. Integration of heritage into planning

Section 31(1): "A planning authority must at the time of the revision of a town or regional planning scheme, or the compilation or revision of a spatial plan investigate the need for the designation of heritage areas to protect any place of environmental and cultural interest . . ."

Section 38(8): The provisions of this section (i.e. relating to the impact of a development proposal on heritage resources) do not apply if an evaluation of the impact of such development on heritage resources is required in terms of "any other legislation" subject to provisions laid down in the Act).

Section 28(6): "A local authority may with the agreement of the heritage resources authority which designated a protected area make provision in its town planning scheme or in by-laws for the management of such areas."

2.4. Protection of heritage resources

Section 31(7) "A local authority must provide for the protection of heritage areas through its zoning scheme/by-laws, and the local authority may (Section 54) make by-laws regulating access, use, protection, management, incentives and fines for resources protected under the Act"

2.5. Interpretation and use of heritage resources

Section 31(8): "A local authority may erect signage indicating its status at or near a heritage area."

Section 44 (1): (a-e) "Heritage Resources Authorities and local authorities must wherever appropriate, co-ordinate and promote the presentation and use of places of cultural significance and heritage resources which form part of the national estate and for which they are responsible."

The general principles for national heritage management as set out in section 5 and 6 of the NHRA (read with all other relevant sections), set the parameters for the City Heritage Policy.

2.6. Collections management

Section 30 and 32 of the NHRA are applicable to the to the Supplementary Detailed Implementation Strategy for the maintenance and management of the Art, Antiques and Memorabilia Collection. This should be read together with the Municipal Finance Management Act No 56 of 2003 (**MFMA**).

In terms of the NHRA, Section 30(5) applies to the compilation of an inventory of heritage resources, including heritage objects, and the submission of such an inventory to the relevant heritage authority. Section 32 refers to the management and specifically control of export of heritage objects. Section 32(7) authorizes SAHRA to the maintenance and management of a register of heritage objects, which have been declared heritage objects under the relevant Sections of the NHRA.

In terms of the MFMA, Section 63, the City Manager as accounting officer has a duty to maintain and manage City-owned movable heritage objects, in particular the Art, Antiques and Memorabilia Collection.

1.4 Definition and value of heritage resources

A heritage resource is defined as "any place or object of cultural significance." (NHRA).

Intangible heritage is defined in the NHRA as "Non material heritage or non material culture including traditions, oral history, ritual, ceremonies, language, popular memory and indigenous knowledge systems."

This IMEP Heritage Strategy refers throughout to tangible and intangible aspects of heritage.

Places and objects of cultural significance are important because they link society through memory to a sense of social and individual identity.

The NHRA identifies heritage resources as unique, non-renewable and precious. It states that heritage has the power to affirm diverse cultures and contribute to nation building.

Heritage resources celebrate achievements and contribute to the redressing of past inequalities. Heritage also promotes “healing, and material and symbolic restitution” (NHRA).

Heritage and heritage resources contribute significantly to the sense of identity and history of Capetonians. The recognition of the significance of heritage resources and their inclusion into City management and planning is vital if such resources are to be conserved for future generations to know and understand the past history of their environment and the struggles and developments that shaped it. History, diversity and cultural heritage also adds to the unique qualities of the City and should be sensitively accommodated in development and planning of the city in order that such qualities may be retained as economic generators for tourism and business.

1.5 Concept of a “Strategy”

A strategy is defined as “a systematic plan of action to accomplish a specific goal”.

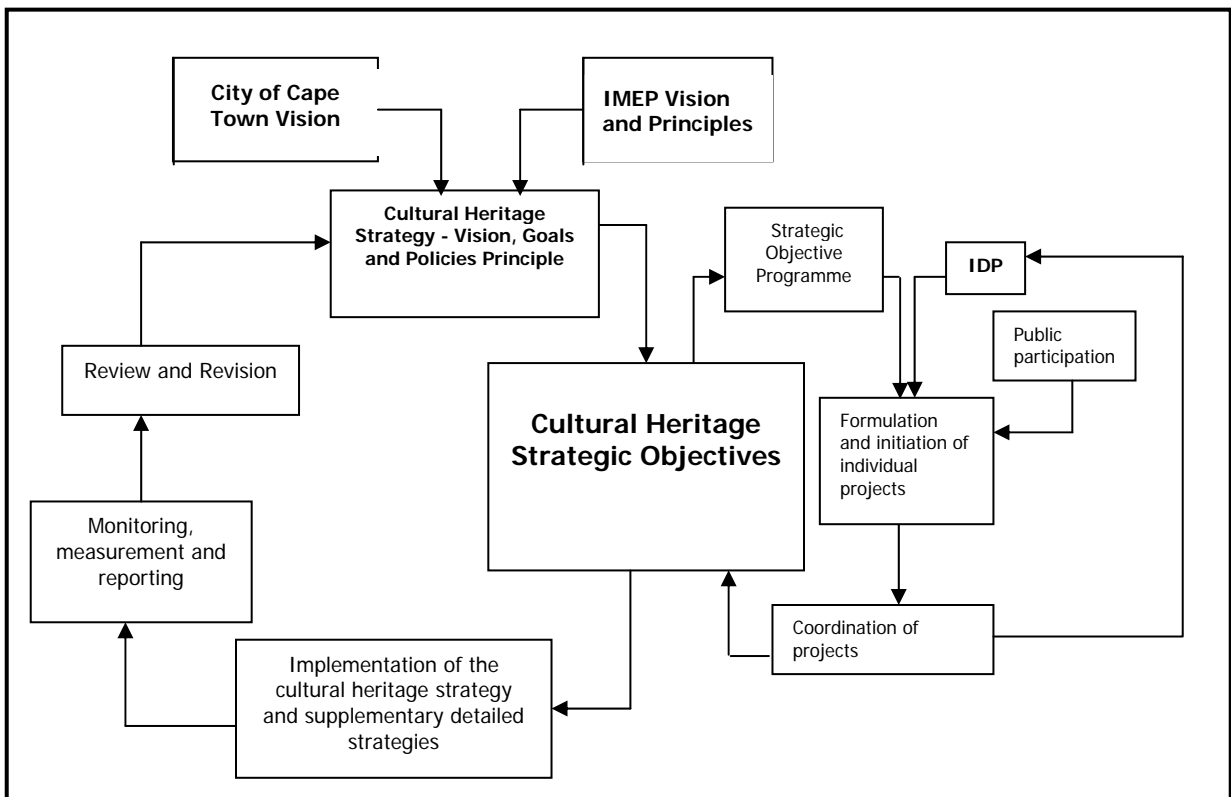


Figure 1: Cultural Heritage Strategy Process

The CCT Cultural Heritage Strategy therefore sets out to be a systematic, integrated, multi-disciplinary organised approach to ensure that the CCT cultural heritage resources are managed, protected and enhanced, for both current and future generations, while social and economic

opportunities are optimised. The Cultural Heritage Strategy process is represented in the diagram above.

1.6 Meeting the City of Cape Town's Strategic Vision, Mission and Values

The strategy contributes to the following goals outlined in the City's strategic direction:

- Poverty reduction
- Economic development, tourism promotion and physical/infrastructure development
- Employment creation
- Good governance
- Improving health, safety and security
- Financial sustainability
- Partnerships
- Communication

The Cultural Heritage Strategy contributes to the following statements in the City's Vision:

- A sustainable city that offers a future to our children and their children.
- A dignified city that is tolerant, non-racist, and non-sexist.
- An accessible city that extends the benefits of urban society to all and builds the capacity of its people.
- A credible city that is well governed and trusted by its people.
- A competent city with skills, capabilities, and a competitive edge.
- A prosperous city known for its ability to compete globally in the 21st century and its commitment to tackling the challenges facing South Africa, the Southern African Development Region, and the African continent.

The Cultural Heritage Strategy contributes to the following Mission of the City:

- Responsible decision making
- Equitable, affordable and sustainable city services
- Dignity and meaningful engagement with City structures
- Opportunities to shape the future of the City
- Fair access to the benefits of urban society and capacity building opportunities
- Trustworthy, accountable, efficient and transparent city government
- The ability to contribute to global, regional, national, provincial and local economic growth and development
- The opportunity to benefit from national and provincial partnerships

Further, the Cultural Heritage Strategy is driven by the following City Values:

- A clear sense of direction and purpose
- Partnerships at all levels of City life
- Openness, accountability and transparency
- Decisions and actions that will take the needs and abilities of future generations into account
- Efficiency, effectiveness and responsiveness
- The promotion of multi-lingualism and cultural diversity

The Cultural Heritage Strategy contributes to all the General Policy Principles within the CCT's IMEP, as well as the following IMEP sectoral approaches:

- Section 4.5 Cultural Heritage
- Section 4.6 Urbanisation and Housing
- Section 4.11 Economy
- Section 4.13 Environmental Education
- Section 4.15 Environmental Governance

1.7 Historic approach to heritage management

Heritage management historically focussed on the conservation of architecture. Early conservation efforts emphasized the importance and the protection of single grand monuments and buildings.

The focus of conservation and general heritage management has subsequently broadened to include objects, groups of buildings, streetscapes, events, struggle history, historic colonial and pre-colonial archaeology, whole settlements and recently, historic and cultural landscapes and contexts. In this, heritage management authorities are assisted by advice from academic, professional and community groups, with an interest in, and knowledge of, heritage.

Greater recognition has been afforded to placing resources in their social and landscape context in order to understand their value and meaning. As a result heritage conservation efforts have focussed on broader fields of intervention.

Further, recognition is being given to sites of historical significance as a result of the roles played by people and events. As a result of these dynamics, heritage management is moving away from a largely architectural basis of intervention, towards a more historically and socially aware approach. In addition, contemporary heritage management stresses the significance of the layering of histories, perceptions and interventions, which affect the City of Cape Town's responses to heritage and the environment. The protection of cultural landscapes is providing heritage management with new challenges and responsibilities. Heritage management and environmental management are linked, because the natural and cultural environment is considered part of society's patrimony and effective curatorship is necessary to pass on such environments to future generations

1.8 Proposed integrated approach to heritage management

In order for heritage management to be effective it should be integrated at an early stage into development management, environmental management, urban design, planning, and cultural and social initiatives.

Relevant legislation at a national and provincial level, with few exceptions, does little at present to support integration of heritage management into broader management processes. However at a local level a greater degree of integration is possible and necessary. The IMEP cultural heritage strategy is based on effective communication, inter-departmental co-operation, the establishment of partnerships and the integration of heritage management into city and metropolitan governance. The cultural heritage strategy promotes closer integration of heritage management into environmental management through a broad cultural landscape based approach, which is a cornerstone of the policy.

1.9 Integration, support and coordination between IMEP Strategies

The implementation of IMEP is given effect through the development and implementation of a number of IMEP strategies. These strategies are developed not only to give effect to various environmental issues, but also to give support to each other, especially where there are

significant areas of overlap. None of the strategies must be seen in isolation but rather in the cumulative effect all of the IMEP strategies have on the broad environment of the CCT.

This integration and coordination between strategies in meeting a common goal is particularly significant with respect to Cultural Heritage management. In particular, both the Biodiversity Strategy and Environmental Education and Training Strategy will give effect to, and address, cultural heritage issues and these strong links of common purpose, overlap and shared responsibility between strategies are key principles in the implementation of IMEP.

Sectoral approaches to IMEP also provide for the development of detailed implementation strategies by specific delivery units. For example, Strategic Executive: Special Projects, has developed an Art, Antiques and Memorabilia Collection Management and Maintenance Plan as a Supplementary Detailed Implementation Strategy, and which has been submitted to Committee under separate cover. (See Supplementary Report attached).

1.10 Strategy roleplayers

The key roleplayers are the three Heritage authorities from the three spheres of government.

A successful Cultural Heritage Strategy will require an integrated and participative approach with input from a wide range of role-players from within Council and external to Council. These role-players will have different levels of input, some driving and owning the process while others participating around specific issues. Distinction between those levels at this point has relevance to responsibilities and degrees of influence and interest through the delegation of roles in the development and implementation of the strategy.

The City's line functions recognised as the **drivers** of the Cultural Heritage Strategy are dependent on the new organisational structure. As a result their full integration has yet to be put in place.

The following CCT line functions and heritage authorities may be considered as **partners** in the strategy: Their role will be dependent on the new organisational structure.

- Planning and Environment
- City Parks and Nature Conservation
- Community Facilities, Arts and Culture, Urban Renewal
- City Police
- Finance
- Emergency Services
- Economic Development and Tourism
- Property Management
- Community Development
- South African Heritage Resources Agency
- Heritage Western Cape
- Table Mountain National Park

Key stakeholders in the Cultural Heritage Strategy should include the following known organizations, which have a professional or community interest in heritage. This list may be amended as greater representivity of heritage groups is achieved, or abbreviated for the purposes of efficiency. They are:

- Western Cape Provincial Administration
- Department of Arts and Culture

- Heritage Western Cape
- South African Heritage Resources Agency
- South African Planning Institute (SAPI)
- NGO's and CBO's
- Academic and research institutions
- Professional Associations involved in heritage including Geographers, Landscape Architects, Heritage Assessment Practitioners, Archaeologists and others.
- Religious Councils
- The South African Property Owners Association
- Business community
- The Cape Town Partnership
- Cape Town Heritage Trust
- Vernacular Architecture Society

2. The Strategy

2.1 Conceptual framework

The following Cultural Heritage Strategy describes the principles and objectives required for effective heritage management. The policies must be applied according to the City's legislative mandate, and through the appropriate management structures.

The City must be capable of implementing the strategies in line with heritage by-laws and delegated authorities that may apply at local government level. The City is also required to ensure that it has the capacity and skills to undertake delegated tasks.

The strategy identifies the agencies within council responsible for implementing this policy and what they need to do to ensure effective, sustainable heritage management.

2.2 Vision

Cape Town is a unique historic city. It derives its character from evidence of a layered and multi-faceted history, its dramatic scenic setting, its historical townscapes and cultural landscapes, its cultural and heritage diversity and the traditions and memories that arise from its past.

The role of the City is to co-ordinate the protection and enhancement of this unique character.

The protection of heritage sites and the traditions and memories associated with them, are an important part of City management.

The City's vision is of a unique historic city where the heritage of its past and present inhabitants is respected, protected and enhanced through appropriate heritage management practices; adherence to sensitive, socially aware and appropriate heritage concepts; and integration with other City responsibilities and policy objectives

2.3 Guiding Principles for heritage management

The principles of heritage and heritage management are based on the following criteria:

2.3.1 *The "ability to demonstrate" or contribute to an understanding of:*

- The role and importance of the City of Cape Town and its places, structures and memories in the lives of various communities over time; particularly in the struggle for democratic rights;

- The extent to which the City of Cape Town reflects the history of, the region and the nation over time;
- The nature and significance of uncommon, rare uncelebrated and endangered aspects of the city's natural or cultural heritage evident in the City of Cape Town
- The principal characteristics of a particular class of the City's natural or cultural places;
- Aspects and elements within the City of Cape Town that demonstrate a high degree of creative or technical achievements during particular periods.
- The importance of indigenous people and migrancy (past and present) including the colonial period, the migration of Xhosa people as well as new immigrants to Cape Town.
- The heritage legacy of all strata of society including the poor and working classes.

2.3.2 Associational links with past events, person(s) and activities for which there is no remaining physical evidence:

- The significance of the metropolitan area as a whole, and spatial precincts within it, in terms of the association with particular communities or cultural groups for social, cultural or spiritual reasons;
- The association of precincts within the metropolitan area, and specific sites, with the life or work of a person, group or organisation of importance in the history of the city, the region and the nation;
- The nature of sites with reference to the impact of major periods of social history including pre apartheid, apartheid and post apartheid eras;
- The nature of sites of significance relating to the history of slavery in the City;
- The importance of the metropolitan area as a whole and in particular spatial domains within it, in exhibiting particular aesthetic characteristics valued by communities or cultural groups.

2.4 Key strategic principles

The draft cultural heritage strategy for The City of Cape Town recognises that:

- The principles attached to heritage management in the NHRA apply;
- Heritage resources belong to and represent all the people of Cape Town;
- Heritage resources include the natural as well as the built environment;
- Heritage resources are finite and irreplaceable;
- Heritage resources are place and culture specific but the value of the respect for the past is universal;
- Heritage resources provide a sense of social, regional and cultural identity.
- Heritage resources concern aspects of both material and non-material, tangible and intangible culture

The draft cultural heritage policy should ensure that:

- The conservation of heritage resources is enriched by cross-disciplinary discourse;
- Heritage resources are integrated into planning and developmental decisions and processes;
- Heritage management is based on a critical evaluation of past successes and failure;
- Heritage management takes cognisance of urban and rural areas, and global and regional trends and applies the principle of equity in all processes

Based on the preceding principles and objectives, the following policies of principle can be identified:

2.5 Policies of principle

Policy 1: Access

Citizens should enjoy rights of access to public heritage resources as part of the common legacy of the historic City. Access to heritage resources should not be restricted on the grounds of gender, disability or race.

The City will ensure access to public heritage sites, particularly where the public has traditionally enjoyed rights of access.

The City will encourage access to heritage sites and ensure that such sites are appropriately marked and explained for public understanding.

The City will encourage where possible the creation of views of heritage sites where there is no general access.

Policy 2: Archaeology

The City of Cape Town is rich in archaeological resources, which represents much of the undocumented history of Cape Town.

The City will assist the relevant archaeological authority (Heritage Western Cape) in mapping known archaeological resources. The City will also ensure that appropriate archaeological studies are undertaken in the instance where archaeological resources are to be found, and where the City has the authority to attach such requirements.

The City will also ensure that redevelopment, excavation for development or any form of sub-surface intervention, which has been identified as potentially sensitive, will be preceded by a trial excavation, where the City has the authority to attach such a requirement.

The City will investigate together with the relevant heritage authority the designation of areas of special archaeological significance.

The City will encourage the display and interpretation of archaeological resources.

Policy 3: Authenticity

Each heritage resource reflects a unique expression resulting from a particular historical process. The original fabric and character and use of the heritage resource determines its value and can be read as an historical record reflecting its historical significance and cultural value.

The City will ensure that heritage resources are conserved as much as possible in their authentic state and function, to reflect their historical and cultural value.

The City will ensure that a distinction be made between the authentic fabric of a resource and later and contemporary interventions.

The City will favour respect for existing fabric in restoration procedures.

The City will ensure the use of research methods to ensure that the authenticity of a resource is identified accurately and appropriately conserved.

Policy 4: Community Participation

Community participation in heritage is a vital part of sustainable heritage management. The communities of Cape Town have a key interest in heritage and an essential role to play in identifying and protecting heritage resources. Communities are valuable resources of knowledge, and partnerships between authorities and the public may empower both.

The City will encourage partnerships between itself and the communities and organisations of Cape Town for more effective heritage management.

The City will encourage community participation in heritage issues through effective communication and training.

The City will ensure that public participation is an integral part of heritage management; and that heritage evaluation and identification is undertaken with the help and support of the interested and affected communities

The City will promote partnerships between community groups and heritage agencies in the identification protection and enhancement of heritage resources.

The City will ensure that heritage makes a positive contribution to community identity by better articulating the history of places people and events.

The City will increase the community stake (job creation, physical upgrading, social transformation) in the identification and management of the historic environment.

Policy 5: Context and Scale

The social and landscape context of heritage sites is critical in the understanding and conserving of their significance. The significance of a heritage resource is partly determined by its context and scale.

The context can be both social and spatial, taking into account both historical and contemporary perceptions of their significance. A heritage landscape may be significant by providing a context for a heritage element, while also representing a valuable heritage resource in itself.

Heritage resources can be interpreted and understood at a variety of scales, from an object to an entire landscape.

An understanding of the nature of significance at different scales is fundamental to a holistic approach to heritage management.

The City will consider the relevance of social and landscape contexts when making decisions affecting heritage resources.

The City will acknowledge the significance of scale in making appropriate conservation-related decisions and in evaluating heritage resources within broader contexts.

The City will ensure that the character of places based on their context and scale, (rather than individual sites and objects) is protected, wherever appropriate.

The City will ensure where possible that new developments in historic precincts acknowledge an appropriate scale as well as an appropriate architectural language. Scale, massing, articulation

and texture will be regarded as critical considerations in determining a response to a development proposal.

Policy 6: Cultural diversity

Heritage places and practices are identified, used and understood from diverse cultural perspectives. These may be contested and change over time.

The City will ensure that different readings and perceptions of heritage are acknowledged. The City will allow for cultural diversity and contestation, while seeking to be representative of the broad range of places and practices that are meaningful to cultural groups.

The City will ensure that the heritage environment is enriched by the cultural diversity of the communities of Cape Town through the encouragement of events and traditions; and the commemoration and conservation of heritage sites and structures which represent the histories of many communities

Policy 7: Cultural landscapes

The City of Cape Town and surrounding areas represent a unique and dramatic natural and cultural landscape. Within this landscape a wide variety of cultural landscapes can be identified which differ in scale and nature. They provide evidence of the City's history over time and contribute to a sense of place and identity. They provide dynamic reference points and positive instruments for growth and change.

The City will conserve the unique cultural landscape and scenic qualities of the region for the benefit of its inhabitants and for tourism. The City will ensure the identification and appropriate management of such cultural landscapes as fundamental to the economy and well being of the City.

The City will ensure that the cultural landscape is protected and managed as an integral part of development and environmental planning.

The City will ensure that the protection of the cultural landscape is enhanced by recognising and giving value to the many layers of cultural significance resulting from the area's long history and prehistory.

Policy 8: Development

Growth and development are essential to the economic life of a city and its inhabitants. Heritage management should seek to work within and guide development, to protect heritage resources and to supporting economic growth.

The City will respect existing individual property rights and operate fairly and reasonably in this context in the management of its heritage resources.

The City will ensure where possible that development does not destroy and adversely impact significant heritage resources.

The City will ensure that additional development rights are not granted automatically when heritage resources are conserved as part of the development and incentives (there is not a general presumption that additional development rights will be granted if heritage resources are conserved as part of the development proposal.)

Policy 9: Environmental Sustainability

Heritage resource management needs to be sustainable to ensure success. To ensure a sustainable heritage environment, management should balance demands placed on the environment by people and commercial activities without reducing the capacity of the environment to provide for itself and for future generations.

The City will ensure the integration of the aims of social progress, effective protection of the historic environment, the prudent use of resources and the maintenance of significant levels of economic growth and employment as means towards sustainable development.

Council will meet the demands placed on the historic built environment and cultural landscapes without reducing the capacity of the heritage environment to provide for future generations and without limiting the opportunities for future changes in heritage values and meanings.

Policy 10: Heritage, tourism and economic growth

Heritage resources are valuable economic resources, especially with respect to tourism. Attractive adaptive reuse of historic buildings, applied sensitively, can encourage investment and support economic growth while conserving and enhancing the unique character of the City.

The City will encourage the sensitive use of heritage resources for job creation through tourism.

The City will encourage the appropriate presentation of heritage sites and landscapes for tourism purposes.

The City will encourage tourism-related activities that utilise historic resources and sites with respect.

The City will encourage investment in adaptive reuse of historic sites, and discourage their demolition or inappropriate alteration.

Policy 11: Heritage significance

Heritage management requires the identification, interpretation and conservation of heritage resources of significance.

The City will ensure the appropriate protection and enhancement of its heritage resources of cultural significance by:

- Recognising the many layers of cultural significance resulting from the areas long history including the pre-colonial period; and the changing roles the city has played over time; and
- Protecting and enhancing the spectrum of significant heritage resources which range from the historic city itself to significant patterns, plantings, spaces, buildings and elements which reflect the city's history over time.

The City will promote the awareness of its significant heritage resources with particular emphasis on places and histories, not previously identified through the heritage policies.

The City will promote the role of the culturally significant historic environment in shaping of future development where appropriate.

The City will make provision for the protection and enhancement of sites associated with 20th and 21st century history. This will have particular relevance to the recognition of the role of the struggle for democratic rights.

The City will ensure that the protection and enhancement of significant heritage resources is inclusive, multifaceted, democratic and open; and is based on appropriate multidisciplinary research and relevant consultation.

The City will map and grade heritage resources according to their agreed cultural significance.

Policy 12: Integration

To be effective, heritage decisions should be integrated into economic, environmental and planning processes.

The City will ensure that the integration of identification, protection and enhancement of heritage resources into the economic, environmental and planning processes, as required by law.

Policy 13: Interpretation

The value and significance of some heritage sites is not self-evident. They require interpretation to explain their significance. Interpretation may be multi-layered and even conflictual. Interpretation of the heritage of Cape Town and environs should acknowledge its often painful and oppressive past. Explanation of significance may be through appropriate processes involved in consultation, interpretation, markers, plaques and memorials.

The City will ensure that heritage sites are appropriately and accurately interpreted, to reach as many Capetonians and visitors as possible.

The City will ensure that heritage sites are appropriately marked and commemorated where necessary.

The City will ensure that interpretation is informed by appropriate academic research and public participation, including oral histories where necessary.

The City will ensure that interpretation, consultation and research inform the identification of cultural significance.

The City will ensure that its heritage objects which include its Arts Antiques and Memorabilia Collection is conserved and displayed in accordance with the Supplementary Detailed Management and Maintenance Strategy (Supplementary Report attached).

Policy 14: Tangible and intangible heritage

Cultural value resides in both tangible and intangible heritage. Oral traditions, ceremonies, events and knowledge systems are a vital part of heritage. Intangible heritage enriches the experience of the physical environment through memory and knowledge. Living heritage is an integral part of contemporary experience and links social and individual memory to daily life.

The City will ensure that a range of significant heritage resources (many previously unacknowledged) is recorded and protected.

The City will assist in the identification and recovery of unrecorded historical and cultural knowledge. It will acknowledge that not all aspects of cultural significance find expression in physical fabric but reside in memory and tradition.

The City will utilise community and academic knowledge and insight to interpret the sites and elements of cultural significance and to communicate their meaning to a wider public.

Policy 15: Urban regeneration

The restoration and appropriate reuse of historic structures is a catalyst in the urban regeneration of Cape Town. The management of heritage sites and structures is most successful when integrated into general conservation and development strategies for urban regeneration.

The City will encourage and facilitate the integration of the conservation and adaptive re-use of heritage buildings into urban regeneration strategies.

The City will ensure that buildings and sites of historical and architectural significance make a positive contribution to the quality and the economy of urban life and the development of tourism, and create an enabling environment for urban regeneration.

2.6 Management structure for the cultural heritage strategy

The Cultural Heritage Strategy will be managed according to the management structure identified below.

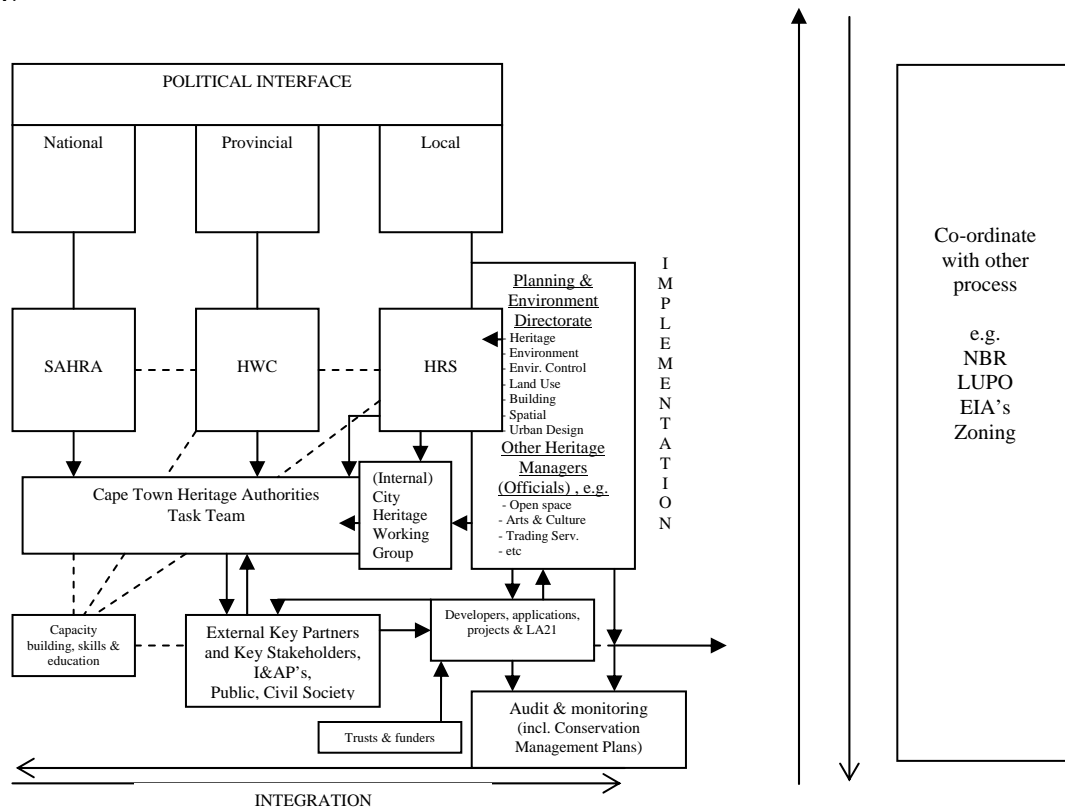


Figure 2: Management structures for the Cultural Heritage Strategy

2.6.1 Political Level

- a) National
The South African Heritage Resources Agency (SAHRA) has a National office and a regional office, both located in Cape Town. SAHRA falls under the Minister for Arts and Culture and the Department of Arts and Culture.
- b) Provincial
Heritage Western Cape (HWC) is located in Cape Town, and falls under the Provincial Minister for Cultural Affairs and Sport and the Department of Cultural Affairs.
- c) Local
The Heritage Resources Section falls under Environmental Management within the Planning & Environment Directorate. The Mayoral Committee Member for Planning & Environment Portfolio is responsible for Heritage Resources Management at the local political level.

2.6.2 Director: Planning and Environment (Current Structure)

The Directorate Planning and Environment is the owner/custodian of the Cultural Heritage Strategy. In the new City structure, the Directors : Environment and Town Planning will work co-operatively to undertake *inter alia*, the following roles and responsibilities:

- Overall coordination and facilitation of the strategy
- Liaison with other relevant departments and bodies
- Chair of the Heritage Working Group (internal)
- Represents the City on a Heritage Authority Working Group (intergovernmental).

In addition the Directorate: Governance and Integration is the owner of the Art, Antiques and Memorabilia Management and Maintenance Plan (A Supplementary Implementation Strategy to this overall Cultural Heritage Strategy - see attached). The roles and responsibilities outlined in the attached detailed implementation strategy apply to the Director: Social Development and Special Projects (Chief Operations Office)

2.6.3 The Heritage Working Group (internal)

The Heritage Working Group will take overall responsibility for overseeing and implementing the Cultural Heritage Strategy and for ensuring an effective and efficient heritage management programme across the City. This Working Group will meet monthly bi – or quarterly, as necessary and will be chaired by the Director: Planning and Environment or his/her representative. The Director may nominate a coordinator of the group. A representative/s of this Heritage Working Group will liaise with SAHRA and HWC officials, and with representatives of heritage groups in civil society where appropriate, including the key partners and key stakeholders mentioned in 1.10 above.

This working group will have the following roles and responsibilities:

- Strategic planning around heritage management in the City
- Development of policies, priorities and action plans for implementation of heritage strategic objectives
- Ensuring alignment with National and Provincial requirements
- Integrating decision making and allocation of resources and capacity between Directorates
- Promotion and awareness of the Cultural Heritage Strategy and heritage issues both locally nationally, and internationally

- Ensuring implementation of Action Plans and programmes through the Working Group members and project managers
- Monitoring of strategy and management plans
- Advisory function
- Seeking partners for fundraising where appropriate
- Empowerment and expertise support
- Ensure integration, coordination and communication regarding other IMEP Strategies

For each of the Strategic Objectives, the Working Group established will be responsible for developing action plans to meet the goals for that specific Strategic Objective. The Working Group will be coordinated by a responsible and appropriately skilled person, who has been nominated to this position by the Heritage Coordination Committee. The Working Group will develop Action Plans that will contribute to the implementation of the overall vision and goals of the Cultural Heritage Strategy. These Action Plans will be implemented through line functions, area managers, partners, partnerships and project managers.

2.6.4. Heritage managers/officials

The adequate and appropriate management of heritage resources is to be considered as part of the new organisational design structure. In so doing the City of Cape Town will ensure that it has the capacity and skills to maintain its heritage management roles and responsibilities, both in order for the City to be deemed 'competent' in terms of the NHRA, and for effective heritage decisions in the development process in the whole of the City of Cape Town including the Districts.

2.6.5. Cape Town Heritage Authorities Task Team

The Cape Town Heritage Authorities Task Team will be established and convened (as is already happening informally) in the spirit of co-operative governance, jointly by the 3 heritage authorities. The Task Team will be intended as a mechanism for communication, partnerships and coordination around heritage issues in Cape Town. The Task Team will establish liaison channels with cultural groups and heritage stakeholders and roleplayers, including NGO's, such as the Langa Heritage Forum, Cape Institute of Architects, South African Planning Institute and the Cape Town Heritage Trust. The Task Team and the City's Heritage Working group will seek to assist in capacity and skills building for civil society groups, and vice versa where interest groups can assist the City. The Cape Town Heritage Authorities Task Team will not report to a higher authority nor will it fulfill an implementation function. It will serve as a forum for sharing ideas and communicating and integrating around heritage issues. The Cape Town Heritage Authorities Task Team will have the following functions:

- Information sharing on initiatives and issues
- Coordination of efforts and programmes
- Capacity building and skills development
- Establishment of partnerships
- Support, education and capacity building
- Establishment of common heritage management goals for Cape Town and ensuring that those goals meet regional and national targets and programmes
- Liaison with other local heritage forums

The Heritage Task Team will meet quarterly, or more frequently, as necessary and will initially be coordinated on a rotational basis between SAHRA, HWC & HRS. The co-ordination function in the long-term will be decided by the members of the Task Team.

2.6.6. Resolution of disputes

Disputes which may occur between the City and another party about a heritage related decision, (For example between the City and a developer over the significance and grading of a heritage resource) will follow the standard dispute mechanisms within the City; or follow standard delegation channels and procedures between the City, and Provincial and National heritage authorities.

3. Implementation

Implementation of the Cultural Heritage Strategy will occur at two levels. The first level may be considered as a strategic planning level at a city-wide scale. Strategic planning will produce policies and programmes for each of the cultural heritage Strategic Objectives that will be implemented at the second level, that of on-the-ground projects by area and project managers. The second level will give effect to the first level.

In the third quarter of each financial year the Heritage Task Team must develop an implementation plan and associated business plan for the next financial year. This must include at a minimum:

- Identification of programmes for development and implementation
- Identification of responsible persons/departments/directorates
- Timeframes for development and implementation
- Budgets
- Key performance indicators

Public and stakeholder participation is considered an essential component of the Cultural Heritage Strategy and will take place around the development of area specific policies, projects and programmes.

A number of projects, initiatives and programmes are currently underway that will support or contribute to the strategy. However official implementation of the Cultural Heritage Strategy for the CCT will begin on the date that the strategy is adopted and endorsed by the relevant Council committees.

3.1 Strategic Objectives

The effective and efficient protection and enhancement of heritage management is multifaceted and as such a number of Strategic Objectives have been identified. Each Strategic Objective contributes to the overall enhancement and management of heritage resources within the CCT. The Cultural Heritage Strategy is founded on the development of overall approaches to each of these Strategic Objectives.

Key cultural heritage objective

To identify, assess, conserve, manage and enhance the heritage resources, structures and landscapes of all the people of Cape Town and ensure that the memories and values associated such resources are appropriately represented.

3.1.1 Further objectives

- To comply with the relevant heritage statutory requirements for heritage management
- To integrate heritage concepts and management into other city responsibilities
- To ensure that spatial, developmental and environmental planning accommodates and responds to the unique history, scenic and environmental qualities of Cape Town
- To acknowledge the achievements of individuals and groups during its history and seeks to recognise and protect places, narratives and traditions associated with such people and events
- To conserve a historic city where heritage adds value to the place as a cultural and economic destination point and where heritage is regarded as a priority for planning, economic regeneration, tourism and cultural and social identity
- To lead by example in recognising the cultural values of Capetonians and the expression of such values in the physical environment
- To balance the need to conserve heritage resources with the need for development and growth
- To introduce an approach to heritage management which is holistic, socially and historically aware; and inclusive
- To encourage a sense of ownership, sensitivity to and experience of heritage resources
- To acknowledge the unknown, and the lost, intangible unrecorded components of heritage management
- To develop, enrich and enhance heritage resources
- To manage heritage resources including the formulation of a “basket” of specific management policies related to, *inter alia*:
 - The development of a heritage resource data base
 - Mapping of heritage structures and sites
 - Management of graded structures;
 - Management of heritage areas
 - Management of city owned heritage objects such as artwork antiques and memorabilia in accordance with the Art, Antiques and Memorabilia Collection Management and Maintenance Plan.
 - Inclusion of heritage concepts into the planning framework
 - Management of heritage resources in terms of authority that may be delegated from the provincial heritage authority (Heritage Western Cape)
 - Identification and enhancement of historical sites and interpretation of their significance
 - Identification and management of cultural landscapes
 - Management of heritage in a sustainable manner
 - The integration of heritage management into broad environmental management systems
 - The integration of heritage management into the regulatory frameworks (by-law and zoning scheme)

An over-arching theme of the Cultural Heritage Strategy, is the role of partners and partnerships in protecting and managing heritage resources. The CCT acknowledges its responsibility as a steward of the resources within its charge, but also recognises the shared responsibility and need for co-operative governance and partnerships in the protection and management of all levels of heritage resources. This will avoid duplication of efforts and inefficiency, ensure that a common vision and purpose are pursued, and share limited resources skills and capacity.

More specifically the City of Cape Town must actively seek help and partners for all of the Cultural Heritage Strategic Objectives in:

- Project and programme development and implementation
- Expertise

- Capacity
- Information sharing
- Funding and resources
- Capacity and training
- Technology

Key partnership principles include:

- Empowerment, pride and a sense of ownership amongst Cape Town communities of their heritage and cultural resources
- Participation in National and Provincial heritage programmes
- Economic development of disadvantaged communities through the optimising economic potential of our heritage assets
- Capacity building and shared responsibility

The (seven) Strategic Objectives that together make up the Cultural Heritage Implementation Strategy have been identified and discussed in greater detail in Section 4 of this document.

3.2 Monitoring and Review

An integral part of the Cultural Heritage Strategy is the need to measure and monitor the success of the overall strategy through the use of agreed indicators. The results of the measuring and monitoring must inform the review of the strategy and be widely reported on. This will allow for the continual review of the process and facilitate a cycle of improvement.

Indicators must also be developed and put in place to measure the success and implementation of each specific Strategic Objective Action Plan. The methods for monitoring and measuring, and the identification of indicators, must take place in the initial planning stages and be part of the development of the Action Plans.

The strategy, and all the relevant components of the strategy, must be reviewed every five years. The purpose of the review is to assess the success of the strategy and its individual components and make improvements and adjustments where necessary to ensure a cycle of continued improvement.

The implementation of the strategy is a long-term initiative and implementation and success will therefore be measured in years rather than months.

3.3 Reporting

The results of the measuring and monitoring, and performance of the various components of the strategy will be published in the Annual State of Environment Report. In addition, the strategy will be monitored through the City's Organisational Performance Management System.

It is important to popularise and profile success stories to enable replication of best practice through a knowledge management programme. Successful programmes need to be reflected and captured in order to ensure that the achievements and quality of current best practice are maintained, to improve their efficiency and effectiveness, and to guide their continuation. Likewise failures must be recorded and lessons learnt must be communicated.

3.4 Budget and business planning

Critical to the success of any strategy, programme or initiative is the role of budgets and business planning. As part of the Cultural Heritage Strategy, a business planning and budget exercise must be undertaken annually and at least in five-year financial cycles as part of the Medium Term Income and Expenditure Framework (MTIEF). This process must be coordinated through the Heritage Task Team and must ensure that heritage issues and financial requirements are reflected on the budgets and business plans of all relevant line functions and Directorates.

The successful implementation of projects to meet the Strategic Objectives will require partnerships and funding from external organisations and programmes. As such it is imperative as part of the business planning around the Cultural Heritage Strategy that opportunities to establish these partnerships are sought.

3.5 Date of implementation

Official implementation of the Cultural Heritage Strategy for the CCT will begin on the date that the strategy is adopted by the Council of the City of Cape Town.

4. Strategic Management Objectives

The City will identify, assess, protect, enhance and communicate the value of the heritage resources, at a variety of scales, within its area of jurisdiction.

This Strategy has seven strategic management objectives. They are the following:

Objective 1

The City will identify, map and compile a register of the heritage resources within the municipal area. Such resources may include: Objects, structures, streetscapes, settlements, historic and symbolic sites, natural and cultural landscapes and significant plantings.

Such identification will be informed by appropriate architectural, spatial, social and historical research and identification will be at a site, or object specific level of detail.

Identification and mapping of heritage resources will conform to the requirements established by SAHRA and HWC for inclusion into the national data base and heritage register. Where such resources are City owned, an asset and data base will be developed and maintained.

The City will keep a register or inventory of heritage resources and develop a repository for heritage research.

Identification of immovable resources should be undertaken in a format that will facilitate inclusion into the City's GIS system, or in the case of objects, in accordance with the Art, Antiques and Memorabilia Collection Management and Maintenance Plan.

The City will focus on the identification of heritage resources through surveys and projects, and concentrate on areas projects and issues previously not undertaken.

Objective 2

The City will assess the cultural significance of the historic resource and assign a grading to it, according to the requirements of the NHRA and the City's amended consolidated grading system.

The City will manage heritage sites (including buildings, areas and landscapes) of local significance (Grade III) in terms of the requirements of the NHRA.

The City will assist either through delegation of competence, or on the basis of co-operative governance, in the management of development, which potentially impacts on Grade II (provincial heritage sites) and Grade I (national heritage sites)

The grading system refers to typological grading devised for the former Cape Town City Council by C Welsh and M Attwell in 1989. It is a system that sets the scale or grade of significance and identifies grading criteria. In practice the system was simplified into a hierarchy of Grades (1, 2 & 3).

The new system below is intended to 'categorise' as well as 'rank' and should not be seen purely as a hierarchical system. This is because grading depends in many cases, on research about a site, which informs the grading, and the knowledge base about heritage resources is constantly growing and changing. All graded buildings and sites are considered conservation worthy whether at a national, provincial or local level, for the reasons identified in the grading process. In order to remove or change the grading from a graded structure, a motivation and study should be undertaken to justify the loss or change of that grading.

Grading in terms of conservation value are expressed in the following ways:

Grade I: (national heritage sites, potential world heritage sites). Heritage Resources or sites with qualities so exceptional that they are considered of special national significance.

Grade II: (provincial heritage sites, formerly national monuments). Heritage resources which form part of the national estate and which can be considered to have special qualities which make them significant within the context of a province or region.

- *Grade III (a):* Heritage resources, buildings and sites of outstanding local architectural, aesthetic and historical value. Structures and sites of outstanding intrinsic value for social, historical, scenic or aesthetic reasons either individually or as a group.
- *Grade III (b):* Heritage resources, buildings and sites of considerable architectural aesthetic, social and historical value. Structures and sites of considerable intrinsic value for social, historical, scenic and/or aesthetic reasons either individually or as a whole.
- *Grade III (c):* Heritage resources, buildings, sites and areas of considerable local contextual value for social, historical, scenic or aesthetic reasons.

- *Grade III (a, b, and c)* would each acquire generic controls related to their grading. For example, Grade IIIa would require all changes to go through heritage procedures, grade IIIb would require only external changes to go through heritage procedures, and grade IIIc would require external changes visible from a public place to go through heritage approvals.

A site that has national or provincial significance may also have local significance. As a result a Grade I or grade II site may also be regarded as a Grade III site.

Graded heritage resources, which may also be of provincial or national significance, may be managed in consultation with the relevant spheres of government and in terms of the principle of co-operative governance.

Sites which are of contextual value and which are dependent on variables such as scale, texture, use, detail, contribution to the surrounding environment and public private interface should be conserved wherever possible. Where it is not possible to do so and grading can be re-motivated and replacement structures should exhibit similar qualities that contribute to and enhance the acknowledged conservation worthy character of the contextual environment.

In assessing heritage sites for grading purposes the following values will be considered:

Age, rarity, representivity, uniqueness, associational links, relationship to context, historical, symbolic, social, scenic value, intactness, design excellence and context. Context may vary at a variety of local authority scales e.g. metropolitan, sub-regional, suburban, and local significance.

The City may reassess the grading of a structure where appropriate. Reassessment may be initiated by conservation, development or demolition proposals.

Objective 3

The City will afford appropriate statutory protection and management to heritage resources.

The City will protect and manage heritage resources in designated local heritage areas according to the requirements of the relevant legislation. The City will ensure that appropriate management responses to structures and sites in such areas are in accordance with the cultural significance and grading undertaken in the assessment of the resources.

The City will protect and manage heritage resources inclusive of buildings, sites, geographic heritage areas, projects and areas of specialist interest, as required in terms of the relevant legislation. In particular the city will manage heritage resources as required in the relevant sections of the NHRA identified in the statutory framework (see paragraph 2, pages 2-3).

The City will build mechanisms for control, enforcement and compliance into the legislative framework

The City will manage relevant heritage resources within its competence, and as and when delegated and authorised by SAHRA and HWC according to the conditions laid down in the NHRA in terms of Section 8(6) and section 27.

The City will make a commitment to the IMEP Cultural Heritage Strategy by providing the necessary skilled human resources to carry out the plan of action and to satisfy the requirements for being deemed a competent authority in terms of the relevant sections of the NHRA.

The City will protect and insure its heritage objects, artworks, antiques and memorabilia through regular valuation, assessment and adequate insurance. The City will also maintain its heritage objects artworks antiques and memorabilia through restoration and adequate measures to conserve such items.

Heritage Resources graded IIIa, III b, IIIc will be protected and managed by the City of Cape Town whether within groups or individually. Any heritage resource which has been accorded a grading, is deemed significant enough to conserve, where appropriate.

The City will refer heritage decisions affecting Grade II (formerly national monument) sites to HWC for authorisation. The City will refer heritage related decisions affecting Grade I sites (potential world heritage sites) to SAHRA for authorisation.

The City will ensure that HWC decisions and conditions affecting provincial heritage sites are adhered to in related local government decisions. Such decisions shall include those affecting land use planning, environmental and heritage impact assessments, demolition applications and building plans approvals.

Objective 4

The City will administer heritage resources and implement an effective system of heritage resource management, the system of which is periodically audited and updated.

The City will maintain a heritage resources section with the competence and capacity to administer heritage resources, to ensure compliance with the relevant legislation, and ensure compliance by related departments and functions in matter affecting heritage resources.

The City will monitor the system of heritage management to ensure an effective and efficient program, and improve the quality of service as required.

The City will also monitor and update information systems necessary to assist heritage management.

The City will maintain a record of heritage related decisions and records of decisions.

The City will establish a bi-ennial heritage audit to monitor the effectiveness of compliance with strategic objectives.

The City will ensure the monitoring of heritage management by the inclusion of heritage indicators with the City's State of the Environment Report.

Objective 5

The City will protect and enhance heritage resources through projects interventions and incentives.

The City will encourage the enhancement and enjoyment of heritage resources through projects that communicate the value of heritage to the public.

The City will ensure that heritage projects form part of wider planning initiatives.

The City will encourage preferential agreements that assist in the restoration and protection of heritage assets.

The City will encourage revitalisation projects that result in the sensitive restoration, use and reuse of heritage structures and places

The City will implement the objectives of the Art, Antiques and Memorabilia Collection Management and Maintenance Plan insofar City owned heritage objects are concerned (attached)

The City will undertake heritage projects in areas and themes that have previously been overlooked.

The City will undertake projects that affect both tangible and intangible aspects of history.

The City will undertake heritage work that adds to the body of knowledge about heritage process and resources. The city will encourage the documentation of such work.

The City will intervene in development processes, where appropriate, to ensure that heritage resources are not negatively affected.

Objective 6

The City will communicate the value of heritage resources through education, resource development, public projects, the media and the formation of partnerships with relevant groups.

The City in partnership will publish guidelines and advice for property owners and developers.

It will also together with other interested and affected parties publish guided walks linking and interpreting heritage sites for tourists and members of the public.

The City in partnership will ensure that interpretative material is erected throughout the city and at other historic sites explaining their significance and history.

The City will in partnership ensure that a system of commemorative plaques and markers is established, identifying and explaining sites of historical and contemporary significance.

The City will ensure that City owned heritage resources and objects are adequately displayed and protected for the benefit of the people of Cape Town, visitors and future generations

The City in partnership will extend its environmental education function to include heritage education.

Objective 7

The City will ensure that management at a local level is coordinated with policy and implementation strategies of the relevant heritage resources authorities at a national and provincial level

The City will ensure that heritage management is coordinated and integrated with other relevant local government activities and functions, for example, planning, land use management, urban design, environmental management, nature conservation and the management of civic amenities.

The City will remain committed to the conservation of Cape Town's diverse cultural heritage, in line with the principles described in the Integrated Metropolitan Environmental Policy (IMEP) document, namely to:

- Recognise the rich cultural history of the City of Cape Town;
- Recognise the importance of cultural practices;
- Recognise all culture and regions represented in the city of Cape Town;
- Include cultural value, sites and landscapes of historic, significance, areas of scenic beauty and places of spiritual importance in planning and decision-making.

(IMEP, July 2003)

5. Conclusion

An agreed policy will ensure that heritage management is undertaken in consistent and coherent manner. A heritage policy and strategy for implementation will also provide clear guidelines for the integration of heritage, development, and the environment as well as a framework for action based on clear principles and management structures.

The realisation of each of the Strategic Objectives of the Cultural Heritage Strategy will ensure the long-term protection of the City of Cape Town's heritage resources, for the benefit of current and future generations. Further, the enhancement and protection of the City's heritage resources has the ability to play a significant role in the social upliftment and economic development of the people of Cape Town.

In conclusion the following points remain central to the success of the Cultural Heritage Strategy:

- Adequate resources and capacity must be made available by the City of Cape Town to meet the goals and targets of the strategy.
- Partnerships between the City and organisations are central to the success of the strategy.
- Efficient and effective use of resources made available by the City and various donors is central to the success of the Cultural Heritage Strategy.
- The strategy must undergo regular review to ensure continued improvement.
- The City must remain committed to its Cultural Heritage Strategy through the implementation of the Strategic Objectives.

6. Glossary and Definitions

Adaptation:

Appropriate change of fabric, appearance and use to accommodate current demands, which do not adversely affect the cultural significance of a structure or site. The process of adaptation introduces a sufficient degree of flexibility to the treatment of a place or resource to enable change to be managed and still fulfill conservation objectives (Kerr, Baumann).

Archaeological resources.

Material remains resulting from human activity, which are in a state of disuse and or in, or on, land and which are older than 100 years, including artifacts, human and hominid remains and artificial features and structures. They may also include rock art, marine shipwrecks and structures associated with military history (NHRA).

Art, Antiques and Memorabilia Collection

The City owned collection of art objects, antique furniture, artworks and memorabilia relating to events or persons, which reflect the history and culture of the city and its people. Such objects have been donated or bequeathed to the City and are held in trust for the people of Cape Town.

Authenticity

That which is genuine or original and not in an altered or modified state. Authenticity may reside in the fabric itself with its evidence of workmanship and age, or in the design and layout of a place or in the integrity of traditions. It may reside in use, customs, appropriate technology and ownership associated most closely with the heritage resource (Kerr, modified).

City of Cape Town

The City of Cape Town refers to the entire Cape Metropolitan Area. In heritage terms it refers to all the heritage resources within the metropolitan area. It may also refer to the administration that manages the metropolitan area.

Context

The area around a place or heritage resource, which may include the visual catchment (Burra). (May also refer to how a resource is "read" and understood, and as a result may refer to the histories and societal values associated with it.)

Contextual value

The cumulative value associated with an object or place when read as part of a whole. (MA).

Cultural landscape

A physical area with natural features and elements modified due to human activity and resulting in patterns of evidence layered over time in the landscape, which give a place its distinctive spatial historical aesthetic symbolic and memorable character (Lennon, Australia- modified).

Cultural significance

Aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance (NHRA).

Conservation (of heritage resources)

The processes necessary for managing heritage resources so as to retain their cultural significance. These may include protection, maintenance, preservation and sustainable use of resources and adaptive re-use. (Burra)

Development

Physical intervention, excavation or action other than those caused by natural forces, which may change the nature or appearance of a place. Those may include construction, alteration demolition removal or change of use of a place or structure at a place, the removal or destruction of trees or changes to the natural topography of the land (NHRA).

Cultural heritage

What society inherits and attaches sufficient value to, to nurture for future generations, while at the same time recognizing the value of the past.

Heritage resources

Places or objects of cultural significance. (NHRA)

Heritage area

Designated area of special architectural historic, social, symbolic, aesthetic/scenic character, which is protected by legislative mechanisms either at a provincial or local level.

Heritage management

The sensitive and sustainable management of heritage resources; and the application of the relevant laws, within the context of development and community values (MA).

Heritage Impact Assessment (HIA)

A requirement of the National Heritage Resources Act (Section 38) whereby development of a certain magnitude and character require the assessment of the impact of the development on the heritage resources on the site.

Intrinsic value

A heritage resource that has value in its own right, either for reasons of aesthetic, architectural and scientific excellence, or the stories and persons associated with the resource.

Intangible heritage

Non-material heritage or non material culture including traditions, oral history, ritual, ceremonies, language, popular memory and indigenous knowledge systems. (NHRA)

Object

Any movable property of cultural significance which may be protected in terms of the NHRA.

Place

A site area or region, a building or structure, a group of buildings, an open space, including a public square, street or park, and the immediate surroundings of a place (NHRA).

Preservation

The maintenance of the place or the fabric of an object or structure in its existing state and the retarding of deterioration (Burra Charter).
(In South Africa "preservation" is often associated with the conservation of museological objects).

Reconstruction

The process of recreating or rebuilding a structure or place to either a known or conjectural earlier form. Often confused in South Africa with "restoration"

Regeneration/revitalisation

The process associated with giving new life to previously neglected or underutilised heritage resources, and at the same time, contributing to the economic improvement of a broader context. (MA).

Restoration

The process of returning a place or existing fabric to a known earlier state by reassembly and re-instatement of surviving fabric, and by the removal of additions. Appropriate restoration is based on respect for existing fabric and thorough research (Burra).

Strategy

A systematic plan of action to accomplish a specific goal.

Glossary Sources

National Heritage Resources Act (NHRA)
ICOMOS Burra Heritage Charter Australia (Burra)
J.Kerr, The Conservation Plan, Australia (Kerr)
Dr Nicholas Baumann, Heritage Consultant (Baumann)
Melanie Attwell, HRS (MA)

Supplementary Report

THE CITY OF CAPE TOWN: ART, ANTIQUES AND MEMORABILIA COLLECTION

MANAGEMENT AND MAINTENANCE PLAN

(Incorporated into the Cultural Heritage Strategy –IMEP, as a Detailed Implementation Strategy)

INTRODUCTION:

The Art, Antiques and Memorabilia Collection is a significant component of Cape Town's history. It consists of original art works, objects d'art, documents, artefacts, photographs, memorabilia, furniture, films, gifts to councillors and mayors. These items relate to the growth of the City from early times to the establishment and development of municipal government. The primary objective of preserving and displaying this collection is to foster a broader understanding and deeper appreciation of the role that local government has played in the development of communities in and around Cape Town and to preserve and expand this for future generations.

In terms of the Municipal Finance Management Act 56 of 2003, Section 63, the City Manager as accounting officer is responsible for the asset and liability management of Council's assets.

PURPOSE:

The implementation of this strategy is in line with a commitment in terms of the IMEP to ensure responsible stewardship of the resources within local government through open, consultative, integrated and transparent governance of the City of Cape Town, which will be achieved by ensuring best practice environmental solutions and activities are implemented at all times, and that sustained partnerships with communities are achieved.

Thus the purpose of this strategy is to:

- **Ensure the survival of the Collection for the benefit of the people of Cape Town, visitors to our City and for future generations.**
- **Ensure that the Collection is expanded to reflect the multi-cultural heritage of all communities in the development of the City of Cape Town, which is currently lacking.**
- **Provide guidelines for strategic planning, transformation and capacity building.**
- **Provide guidelines regarding acquisitions, accessions, movement of items, loan agreements & preventive conservation strategies.**
- **Provide for the appointment of an Advisory Committee to advise Council on the protection, development, marketing and maintenance of the Art, Antiques and Memorabilia Collection.**
- **Ensure synergy between all arts & culture related initiatives within the City through the implementation of an all inclusive stakeholder management plan.**

- **Encourage communities to nurture and conserve their legacy.**
- **Prevent loss through theft, inadequate conservation, maintenance measures and poor record keeping.**
- **Promote good governance.**
- **Ensure that the Collection is developed to reflect the multi-cultural heritage of all communities as part of Cape Town.**
- **Expanding the service by making the Collection available to the public through proper displays and exhibitions.**
- **Conform to relevant provincial and national legislative requirements in respect of import, export, repatriation, acquisition, preservation and protection of natural and cultural heritage.**
- **Ensure compliance with Council's Asset Management Policy.**
- **Ensure that the Art, Antiques and Memorabilia Collection is adequately insured in accordance with Council's Finance Insurance Policy and regularly assessed and valued.**
- **Ensure that adequate security and protection of the collection is in place.**

Governance - a professional curator answerable to the Chief Operations Officer and Director: Social Development in consultation with key stakeholders on an Internal City Heritage Working Group as well as External Key Partners.

Scope of the Collection - the scope of the collection is directed, but not limited, to those objects that are representative of the establishment and growth of municipal government and the effect it had on the development of local communities. Most material found in the collection is the result of in-house collecting of old instruments used and donations, gifts and bequests from individuals and institutions.

Heritage objects – as an ongoing process submissions will be made to the SA Heritage Resources Agency with regard to the proposed declaration of specific items as heritage objects in terms of the National Heritage Resources Act of 1999, Section 32.

Collection and Accession – material should be relevant to and representative of the cultural history of Cape Town and its people. It may consist of art works; artefacts; documents; photographs and transcripts. Once acquired, all donations and bequests must be unrestricted and subject to a legal transfer to the City of Cape Town with full copyright. It is priority to collect items that will strengthen areas in the collection where it lacks representation of various cultural groups and communities.

Disposal and De-accessioning – items that are duplicates or have deteriorated beyond any usefulness should be transferred to more suitable institutions or be disposed of. No items should be disposed of without consensus of the advisory committee and council approval. De-accessioning must follow procedural policy laid down.

Communication – to make the collection, services and expertise available, accessible and understandable through exhibitions, publications, and programmes.

Exhibition – to share Cape Town’s civic heritage with visitors, local communities and members of staff, exhibitions appropriate to the Collection should be periodically erected in suitable venues. The protection of objects on exhibit shall take precedent over aesthetic appearance.

Accommodation – storage and display areas to include security, temperature and humidity controls, be available for regular supervision and give controlled access to the public.

Documentation System – the development and maintenance of a professionally accredited database containing complete records of the collection to be operated by appropriately qualified people. This database shall be updated accordingly when any item is put on display, removed from display, placed on loan, restored, researched or de-accessioned.

Loans – both long and short term loans may be made to recognised institutions or organisations for display purposes. These loans will include legal agreements providing for care, transportation, insurance, display, intention for use, storage and acknowledgement. The City Council may from time to time seek loans from other organisations and individuals for a specific purpose.

Conservation – all decisions on conservation treatment shall address the item’s aesthetic, historic, scientific and physical integrity.

Copyright and Reproduction – all material acquired must have full City of Cape Town copyright for possible reproduction and commercial use. The right to exact payment for use of material from the Collection should be included.

Staff Requirements – full-time suitably qualified personnel that will be responsible for the implementation of the policy.

Partnerships – collaboration with external and internal stakeholders identified in terms of the overall Cultural Heritage Strategy (IMEP) which will ensure synergy and an integrated approach for all related art, culture and heritage matters within the City and encourage partnerships with community representatives, cultural, academic and commercial institutions, provincial and national government and other heritage managers within the City.

Budget Allocation – appropriate operational and capital funds be allocated annually to expand, exhibit, preserve and maintain the collection.

ANNEXURE 2 CULTURAL HERITAGE STRATEGY: TARGETED PARTICIPATION

- SUMMARY

Portfolio Committee Workshop:

As an IMEP Strategy this policy document was workshopped with Planning & Environment Portfolio Committee on 3rd June 2004. The workshop committee members worked through the policy document point by point and allow for comment from the Councillors present.

The participants at the workshop requested certain amendments to the first draft, as follows:

1. Some mention should be made to highlight the contribution heritage resources management can make to tourism development and other economic empowerment activities (cf.1.4 of Final Draft);
2. It was emphasised that heritage resources are not just cultural (i.e. man-made or derived from just the "built" environment) but also include natural features and whole landscapes as well. The workshop suggested the following changes:

The role of the City is to coordinate the protection and enhancement of this unique character

The City's vision is of a unique historic city where the natural and cultural heritage of its inhabitants, past and present, is respected, protected and enhanced through appropriate heritage management practices – adherence to sensitive, socially aware and appropriate heritage concepts and integration with other City responsibilities and policy objectives.

3. Workshop participants requested the following changes to the Policies of Principle in the first draft;

Policy A1: Access

In the first, introductory sentence to this section discussion took place but remained unresolved as far as the wording and whether or not it should read: Citizens should enjoy rights of access or The city should strive to ensure that citizens enjoy the right of access to public heritage resources as part of the common legacy of the historic City. (c.f. 2.5 of Final Draft).

Policy 2: Archaeology

The workshop suggested the following change to the first sentence:

The City of Cape Town is rich in archaeological resources, which represent much of the unknown and undocumented history of Cape Town (c.f. 2.5 of Final Draft)

Policy 4: Community Participation

The following change was requested to the second sentence of this section:

The City shall encourage partnerships between itself and the communities and organizations of Cape Town for more effective heritage management (c.f. 2.5 of Final Draft)

Policy 10: Heritage, Tourism and economic growth

Under this section it was questioned whether or not the word “encourage” was strong enough language as far as the role the City should play in the promotion of heritage tourism initiatives. No consensus as to a better word, however, was arrived at. (c.f. 2.5 of Final Draft – wording not amended).

Policy 11: Heritage Significance

It was suggested that the word “*identification*” was inadequate and that there was a need to not only “identify” but “*advertise, market, promote and interpret*” the significance of heritage resources to the often uninformed general public to promote appreciation and in turn, the conservation of these resources. (c.f. 2.5 of Final Draft)

4. In the section dealing with the management policies for ‘Implementation’, the workshop called for a more overarching statement (c.f. 3 of Final Draft) acknowledging that the City has a “watching brief” on all the heritage resources of the City whether these be recognized as “Local”, “Provincial” or “National” in significance.

Objective 2

At the same time, participants cautioned that taking on responsibility for Provincial and National Heritage Sites could result with the City doing the work and paying the costs for what is in fact the function of other authorities. It was also noted that heritage resources should include not only “*buildings*” and “*sites*” but also “*areas*” and that the word *areas* be added to the proposed grading system for the City, outlined in this section. (c.f. 4; Objective 2 of Final Draft).

Objective 3

It was suggested that in this section some mention should be made of not just heritage resources as buildings or sites but also “*areas, precincts and areas of special interest*” (c.f. 4; Objective 3)

Objective 6

In this final section it was proposed that the words: “The City “*in partnership*” shall” should be added to the last four policy statements. (c.f. 4; Objective 6).

Lastly, the workshop proposed that something should be added to this document about the more recent historical/cultural past and in particular the history of forced removals. In addition the workshop highlighted the need to identify not only heritage resources but also the contextual milieu or surrounding environment of which these are a part and that this is a message that needs to be “conveyed” to planners. (c.f. 1.4 and 1.7).

Targeted Public Participation:

On 21st October 2004, the Mayoral Committee Member authorised a targeted Public Participation process.

On 4 November the IMEP Cultural Heritage Strategy was sent to approximately 160 people representing a large number of organizations with a community or academic interest in heritage. The document was sent via email to targeted community groups and specialist groups with an interest in Heritage Resource Management with paper copies available on request:

'buttgens@mweb.co.za'; 'Derek@cndv.co.za'; 'carohn@iafrica.com';
'harrietdeacon@iafrica.com'; 'Andrew.spinks@shands.co.za'; 'vwvouter@mweb.co.za';
'VASSAI@hotmail.com'; 'Igarchts@iafrica.com'; 'sslad@absamail.co.za';

'michaels@parkssa.co.za'; 'fontmker@wol.co.za'; 'cpia@iafrica.com';
'nrockman@pawc.wcape.gov.za'; 'ctht@heritage.org.za'; 'gpciel@capetownpartnership.co.za';
'paperkey@telkomsa.net'; Keith Wiseman; Lindie Buirski; Mark Callaghan; 'cap@iafrica.com';
'renees@parks-sa.co.za'; 'amalan@age.uct.ac.za'; 'info@districtsix.co.za';
'chenobz@iafrica.com'; 'emg@global.co.za'; 'hassiem@enviro.uct.ac.za'; 'shroyer@iafrica.com';
'nevilled@iafrica.com'; 'hjdeacon@iafrica.com'; 'ronmarti@pgwc.gov.za'; Owen Kinahan;
'fmf.ct@mweb.co.za'; 'mayib@lib.uwc.ac.za'; 'iplatzky@pawc.wcape.gov.za';
'hdupreez@pawc.wcape.gov.za'; 'Fmaggash@pgwc.gov.za'; 'cape@archrsa.com';
'educate@robben-island.co.za'; 'case@saa.ac.za'; 'given@saa.ac.za'; 'bcrouts@sahra.org.za';
'dhart@sahra.org.za'; 'mleslie@sahra.org.za'; 'Fiona.Ogle@lcapetown.gov.za';
'wpe@belpark.sun.ac.za'; 'wfehr@iafrica.com'; 'nosipdil@iafrica.com'; 'sean@beattie.uct.ac.za';
'hill@enviro.uct.ac.za'; 'sandile@humanities.uct.ac.za'; 'tjg@beattie.uct.ac.za';
'davies@enviro.uct.ac.za'; 'vbs@humanities.uct.ac.za'; 'enrg@absamail.co.za';
'fhendricks@uwc.ac.za'; 'Iwitz@uwc.ac.za'; 'aikman@wol.co.za'; 'izalb@mweb.co.za';
'urbancon@iafrica.com'; 'urbands@iafrica.com'; 'hclift@adept.co.za'; 'jakedev@ctech.ac.za';
'lorna@revelfox.co.za'; Jim Hallinan; 'tig@science.uct.ac.za'; 'chris@blomboscave.co.za';
'matrixcc@mweb.co.za'; 'cabotours@cabo.co.za'; 'gjacobs@xsinet.co.za';
'Penelope.jones@shands.co.za'; 'acrm@waccess.co.za'; 'Mtlaros@mweb.co.za';
'Morkelj@ctech.ac.za'; 'bjm@age.uct.ac.za'; 'margaret@selfdefence.co.za'; Bridget O'Donoghue;
Zolisa Pakade; 'maryp@method1.co.za'; 'Urbands@iafrica.co.za'; 'pennyp@iafrica.com';
'erabe@sahra.org.za'; 'ctht@heritage.org.za'; 'natuiq@yahoo.com'; 'smxqua001@mail.uct.ac.za';
'Shaug@saia.org.za'; 'capemanchris@xsinet.co.za'; 'thorold@iafrica.com'; 'Fabio@ebe.uct.ac.za';
'kvtpieterse@sahra.org.za'; 'david@ctn.gapp.net'; 'sewinter@yebo.co.za';
'dworth@ched.uct.ac.za'; 'harrietdeacon@iafrica.com'; 'annemurray@intekom.co.za';
'ssquared@worldonline.co.za'; 'ashley@saheritage.co.za'; 'ofindlay@iafrica.com';
'info@sajewishmuseum.co.za'; 'durbenv@adept.co.za'; 'hbmuseum@telkom.sa.net'
Patricia Joan Heming; todeschi@EBEFAC.uct.ac.za; paperkey@telkomsa.net;
peterbuttgens@webmail.co.za; info@cifa.org.za; pbuthlezi@sahra.org; bglass@sahra.org;
mleslie@sahra.org.za; ctht@heritage.org.za; doc@ovp.co.za; hjdeacon@iafrica.com;
Hdupreez@pgwc.gov.za; Ansa Ferreira; Charles Rudman; Stephen Granger;
'dsfinlay@telkomsa.net'; 'tamra@corporateimage.co.za'; 'one@intekom.co.za';
'tevangelin@sahra.org.za'; 'ctp@worldonline.co.za'; 'ashley@iplus.co.za'; Bridget
O'Donoghue; Dave Saunders; Hans Degenaar; Jim Hallinan; Ken Sinclair-Smith; Lorraine
Gerrans; Melanie Attwell; Barbara Southworth; Basil Tommy; Ruby Gelderbloem; Kim van
Deventer; Liezel du Preez; Roberta Gould; Yasmine Colley; 'kim.faclier@pamgolding.co.za';
'deward@ebe.uct.ac.za'; 'parnell@enviro.uct.ac.za'; 'watson@eng.uct.ac.za'; 'iain@ebe.uct.ac.za';
'bcrouts@sahra.org.za'; 'zayd@districtsix.co.za'; 'michaels@sanparks.org';
'chiefexec@capetownpartnership.co.za'; Judy Hermans; Themba Raymond Sikhutshwa; Jo-Anne
Simons; Jerimia Thuynsma; Faldela de Vries; Patricia Joan Heming; Owen Kinahan; Andrew
Arnolds; 'John.Pietersen@capetown.gov.za'; Danetta Smit; Nomsa Florence Ndandani; Michael
Matoto Ngomana; Sindephi Lose Cuba; Donne Bryant Murray; Lionel Edward Roelf;
'Lourens.Rothman@capetown.gov.za'; 'Nomangaliso.Ntyakatya@capetown.gov.za'

Comments were solicited in writing with the deadline being December 13. This was extended to December 20. The Branch accepted later submissions.

In addition the Environmental Management Branch (Heritage Resources) organized a working session held at the Edith Stephens Wetlands Park Conference Centre on 4 December 2004. Only 3 attendees out of seven who accepted the invitation as per above addressees.

Comments Received:

David Hart: South African Heritage Resources Agency (SAHRA) **DH**

Prof R Davies UCT Dept of Environmental and Geographical Sciences, City Street- naming Committee **RD**

S Townsend Cape Institute of Architects Heritage Committee (**ST**)

A Malan: South African Institute of Archaeologists **AM**

M K Douglas and R Davenport: Cape Town Historical Society **RD**

Dr P Claassen: BEL Committee, HWC **PC**

Dave Wilken: Strategic Planning **DW**

Harriet Deacon: Association of Heritage Assessment Practitioners (AHAP) **HD**

Prof F Todeschini: Faculty of the Built Environment, UCT (**FT**)

Z Minty: District Six Museum **D6**

M Weeder: Diocese of Cape Town (attended workshop) **MW**

J Deacon Chair: Council Heritage Western Cape (attended workshop) **HWC**

V Layne: District Six Museum (attended workshop) **D6**

Others who responded were:

A M Leslie: SAHRA

R Gould: Cityscapes

C Rudman: Blaauwberg Municipality

P Labrosse: City Bowl Ratepayers Association

Their comments have been included and; where appropriate, amendments have been made to the Strategy as a result of their input.

Comments are divided into general and detailed responses from the organizations listed above. Section numbers are attached where the policy has been amended as a result of comments made by the public.

Section	Comments from	Summary	Response
General comments			
	H Deacon (HD)	Policies look very good. Detailed comments below	
	(CIA Heritage Committee (S. Townsend) (CIA)	Commends Council for the Strategy. It establishes "clear/explicit basis for official responsibility and public expectation." It is "well conceived in principle and contains sufficient detailed be useful in practice." Detailed	

		comments below	
	D.Wilken (Arts and Culture) (DW)	Highlights potential overlap with his Directorate's "Arts and Civic Heritage Collection" and IMEP Strategy, which he believes should change its name to "Historical Heritage Strategy"	There is no potential conflict, as the "Arts and Civic Heritage Collection" was originally known as the Mayor's Collection and deals with moveable items of civic value. The suggested change of name is not possible as Full Council has approved IMEP which has the Cultural Heritage Strategy included as part of IMEP. "Historical Heritage" is a tautology
	CT Historical Society (M Douglas and R Davenport) (HS)	Congratulates City on comprehensive document. Detailed comments below	
	SAHRA (D Hart)	Fantastic document. Detailed comments below.	
	City Street Naming Committee, (R Davies) (RD)	Important, readable, logical and comprehensive document. Endorses objectives and content. Focus on material rather than intangible heritage. Detailed comments below.	1.4. amended. See Policy 14.
	Dr P Claassen, HWC BEL Committee (PC)	Strategy represents a massive and much needed input. Document is wordy and idealistic. Detailed comments below	
	District Six Committee (D6)	Congratulates City on developing written document . Believes there are flaws in decision- making processes, monitoring and appeal. Detailed areas of concern listed below.	
	UCT, FBE,(Prof F Todeschini) (FT)	City commitment to capacity and skills underpin feasible strategic management objectives. Coherence with zoning schemes a necessity.	

Comments from	Section	Summary of comment	Response/amendment
Detailed Comments			
H Deacon AHAP	2.5.	Address disabled access	Policy One amended to address discrimination of any kind. See page 12
	2.5.	Interpretation : appropriate means reaching as many people as possible	Policy 13 has been amended accordingly
	4. Objective 1 and 4.	Develop library of HIA's and EIA's.	Strategic objective 1 amended accordingly.
		Include mechanisms for the mediation of heritage disputes	Section 2.6.6. regarding the resolution of disputes has

			been added.
D Hart HWC	4. Objective 2.	Use grade III a,b,c to ascribe generic bylaws or responses to the sites.	Strategic Objective amended accordingly.
Wilken		IMEP Heritage Strategy and Arts and heritage Civic Collection Policy should dovetail.	IMEP Heritage Strategy submitted to Arts and Culture for comment. A and C included as Strategy Roleplayers. See pp 9-10.
R Davies, UCT, Street Naming Committee	Introduction	Replace “preservation” with “conservation”	Amended
	Policy 6	Too great an emphasis on material/tangible culture	See policy 14. Definitions and values of heritage under 1.4. and 2.4. amended accordingly to include greater emphasis on intangible heritage and non material culture.
	2.3	Make explicit that policy objectives should include all strata of society including that of the poor and working classes.	Additional Guiding Principle added under 2.3.1.
	1.10	Include VASSA and SA Society of Geographers	1.10 amended accordingly
	2.3.2.	Include reference to social history of pre apartheid, apartheid and post apartheid eras.	Section 2.3.2. amended accordingly
	4. Objective 1	Include need for social research	Objective 1 amended accordingly.
A Murray, Historical Society	1.10	Add to list of key stakeholders	Amended accordingly. To avoid the list becoming too long, generic groups included for a degree of flexibility.
Dr P Claassen BEL Committee		Include the fact that City of Cape Town needs to be registered as a competent authority before it can undertake delegated heritage functions.	Already included. See Strategic Objective 3 page 27
		City has control only over Grade III heritage resources already identified and registered as well as registered heritage areas	Already included See Strategic Objective 2 page 25
Dr A Malan, HARG.		What is the “City”?	Refers to the Metropolitan area managed by the City of Cape Town. Explanation included in Glossary.
	1.3. Sections 26 and 34 NHRA	What are minimum requirements for delegated competence and what are ideal ones? Question refers particularly to the devolution of archaeological competence	Regulations for delegation of competence still to be promulgated. However competence requirements are set by relevant sections of NHRA.
	1.10	Criteria for selection of key stakeholders	Amended accordingly

	2.2.	Vision should include reference to CT as a place of layered histories	Vision amended accordingly
	1.7.	Redefine "Archaeology"	Definitions set by NHRA
	Policies 6 and 13	Requires structured forum for information and discussion	See 1.10 Key stakeholders
	Policies 8 and 11	Policies should refer to the ethos of recognition acknowledgement and restitution which should be made explicit.	
	3.2.	Who is to monitor archaeology?	Archaeology is monitored by HWC in terms of relevant sections of the NHRA. It is not a competence delegated to local authorities.
	Strategic Objective 2	What is a "historic resource"?	Amended to "heritage resource" which is defined by the NHRA.
S Townsend CIA heritage committee	1.5. Concept of strategy	Strategy should not be called an "approach". More attention should be given to what a strategy should do.	Section 1.5. amended accordingly. Clive to add.
	Section 3	Implementation discussed in general terms and is diminished by position in document. Recommend that Section 4 and Section 3.1. be consolidated before implementation.	Position in document set by standard format set by IMEP strategy.
	Section 5 and 2.6.4	Strategy will only succeed if resources committed to it	Agreed. Strategic objective 3 amended accordingly
		Document is too long. Contains suggestions for abbreviation.	Glossary requested by Council, statutory parametres set arena for local government involvement. List of key stakeholder a amended and abbreviated by generic categories which are flexible.
	2.2.	Vision well stated. Needs reference to the notion of the city as a palimpsest of history.	Vision amended accordingly
	Policy 11	Refers only to "heritage areas"	Agreed. Policy amended to refer to heritage resources, tangible and intangible heritage.
	Policy 3	Policy focuses exclusively on fabric which is problematic. Policy should deal clearly with identifications and assessment of significance, which should be dealt with separately.	Agreed. Policy amended accordingly. Agreed. See Strategic Management Objectives 1 and 2, which deal with identification and assessment separately.
	Objective 2	Assessment and management confused. Conceptual difficulty in describing the grading system and a system id	Assessment is the first phase of a management process. Agreed. Grading system

		hierarchy and a system of category.	amended accordingly.
	General	Uncompromising language used.	IMEP strategy sets out Council’s responsibilities and responses to heritage management. The use of mitigatory language has purposely been avoided to minimize potential confusion.
		City refers in some places to CBD or metro area	City of Cape Town refers to metro area. Glossary amended to include clarification
		Key stakeholder list too long. Lack of criteria for choice of membership	Agreed. Key stakeholder list amended to include generic categories, which allow a degree of flexibility. Basic criteria included.