



CITY OF CAPE TOWN
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CITY OF CAPE TOWN'S HERITAGE RESOURCES MANAGEMENT STRATEGY

(Draft for Public Participation)

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TABLE OF CONTENTS

ACRONYMS AND DEFINITIONS	4
EXECUTIVE SUMMARY	8
1. INTRODUCTION	10
2. CHALLENGES TO HERITAGE MANAGEMENT & OPPORTUNITIES.....	13
3. PURPOSE	16
4. SCOPE	16
5. VISION	17
6. PRINCIPLES	17
7. OBJECTIVES.....	17
8. ENABLERS	17
9. DESIRED OUTCOMES.....	18
10. THEORY OF CHANGE	19
11. STRATEGIC SHIFTS	20
12. STRATEGIC FOCUS AREAS	21
13. ROLES AND RESPONSIBILITIES	23
14. MONITORING AND EVALUATION	24
ANNEXURE A: LEGISLATIVE AND POLICY CONTEXT	25
ANNEXURE B: SUB-GRADING MANAGEMENT GUIDE	29
ANNEXURE C: DETAILED STRATEGIC FOCUS AREAS	30

ACRONYMS AND DEFINITIONS

Acronyms

City	City of Cape Town Municipality
CMP	Conservation Management Plan as provided for in the NHRA
DACS	Department of Arts, Culture and Sport (WC Province)
DEADP	Department of Environment and Development Planning (WC Province)
DMS	Development Management Scheme
DSAC	Department of Sport, Arts and Culture (National)
EHRIC	Environmental and Heritage Resources Information Centre
HMP	Heritage Management Plans as provided for in the DMS
HPOZ	Heritage Protection Overlay zoning
HWC	Heritage Western Cape
ICOMOS	International Council on Monuments and Sites
IDP	Integrated Development Plan
IMEP	City of Cape Town's Integrated Metropolitan Environmental Policy
LAO	Local Area Overlay Zone
MPBL	City of Cape Town Municipal Planning Amendment By-law
MSDF	Municipal Spatial Development Framework
NBR	National Building Regulations
NEMA	National Environmental Management Act, 1998 (Act 107 of 1998)
NHRA	National Heritage Resources Act, 1999 (Act 25 of 1999)
PDIA	Problem-Driven Iterative Adaptation
PHRA	Provincial Heritage Resources Authority
SAHRA	South African Heritage Resources Agency
SDGs	Sustainable Development Goals
SDO	Scenic Drive Overlay Zone
SPLUMA	Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013)
ToC	Theory of Change

Definitions

Term	Definition
active interface	means street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, faces and opens towards the street, and also where ground floor uses accommodate activities that provide a level of interaction between pedestrians and the building uses including cafes/restaurants, shops, offices etc.
actors	includes all parties involved in heritage management in the city - authorities and applicants - including property owners, tenants, heritage organizations, developers, applicants, decision-makers, community groups and heritage authorities.
appropriate	means not negatively impacting heritage significance as set out in the principles of the NHRA and determined by decision-makers responsible for reviewing heritage related applications.
character (of a place)	means collection of qualities and features that are distinctive to a place or area and in this case is used to distinguish period of establishment or pattern of settlement.
City	means the City of Cape Town, a municipality established by the City of Cape Town Establishment Notice No. 479 of 22 September 2000, issued in terms of the Local Government: Municipal Structures Act, 1998 (Act No. 117 of 1998), or any structure or employee of the City acting in terms of delegated authority.
city	means the geographical area (or metropolitan area) under the jurisdiction of the City of Cape Town.
competency	means the expertise, institutional capacity, administrative systems, procedures and protective mechanisms necessary to enable the City to manage heritage resources effectively in terms of the National Heritage Resources Act, the Municipal Planning By-law and this Strategy, including the effective implementation of sections 30 and 31 of the National Heritage Resources Act."
context	means the broader environment within which a development or site is located and can refer to natural systems, topography, the social and economic environment, the built environment, access, public institutions, public space, and public utility services.
cultural heritage	means that which society inherits and which it attaches sufficient value to, in order to nurture for future generations, while at the same time recognising the value of the past.
cultural landscape	means a physical area with natural features and elements modified by human activity and resulting in patterns of evidence layered over time in the landscape which gives a place distinctive spatial, historical, aesthetic, symbolic and memorable character. Can be urban or rural.
custodian	means the owner of a heritage asset and includes the caretaker/ steward of the asset for the greater public good.
development	means any physical intervention, excavation, or action, other than those caused by natural forces, which may in any way result in a change to the nature, appearance or physical nature of a place, or influence its stability and future well-being, including: a. construction, alteration, demolition, removal or change of use of a place or a structure at a place;

	b. carrying out any works on or over or under a place; c. subdivision or consolidation of land comprising, a place, including the structures or airspace of a place; d. constructing or putting up for display signs or hoardings; e. any change to the natural or existing condition or topography of land; and f. any removal or destruction of trees, or removal of vegetation or topsoil.
DMS	means the Development Management Scheme contained within the City's Municipal Planning Amendment By-law, 2015, that governs land use, zoning, and building development and sets out how properties can be developed, what activities are permitted, and the rules regarding building sizes, heights, and setbacks.
eHeritage	means the City's heritage information management system.
General Protections	means triggers in terms of the NHRA which determine whether permissions are required for development actions based on age or type of heritage resource.
Heritage Area	means an area identified in terms of section 31 of the NHRA as being identified for protection on the basis of its environmental or cultural interest.
Heritage Assets	means heritage resources owned by the City.
Heritage Database	means a database compiled by the City containing all properties within its area of jurisdiction (i.e. conservation-worthy AND non-conservation-worthy) and which acts as a comprehensive public record for all surveyed properties and designates assessed non-conservation-worthy (NCW) sites - differentiating them from unassessed properties - to assist with clear, accurate and informed decision-making.
Heritage Inventory	means an inventory compiled by the City containing all conservation-worthy heritage resources within its area of jurisdiction.
Heritage Management Plan	means a Council approved plan for the management of a heritage place protected through the HPOZ.
heritage place	means a property, site, area, region, structure, group of structures, open space, public square, street, park, field or natural feature that is worthy of conservation due to its heritage value.
Heritage Protection Overlay Zone	means the Heritage Protection Overlay Zone within the City's DMS), which is the mechanism for the protection of heritage places and areas that are considered conservation-worthy in terms of the City's heritage strategies and the NHRA.
Heritage Register	means a register maintained by HWC, the provincial heritage resources authority in terms of section 30 on the NHRA, that lists all heritage resources that it considers to be conservation-worthy.
Heritage Resource	means any place or object of cultural significance (i.e. aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance).
intangible heritage	means non-material heritage or non-material culture (including traditions, oral history, oral traditions, rituals, ceremonies, language, popular memory and indigenous knowledge systems).
living heritage	means oral history, oral traditions, performing arts, social practices, rituals and festive events, knowledge and practices concerning nature and the universe, and the knowledge and skills related to craftsmanship

negative Impact	means the impact of a proposed action which will be in conflict with the principles set out in the NHRA and detract from the heritage significance of the site or place.
scenic Drive	means a public road designated as a scenic drive; characterized by high quality scenic qualities including background vistas of mountain, open country, coastline or city.
SDGs	means Sustainable Development Goals adopted by the United Nations in 2015 as a universal call to action to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity.
streetscape	means the distinguishing character of a particular street as created by the elements at ground floor, including building frontages, setbacks, materials, form, road space, landscaping, street furniture, etc.
targeted support areas	means areas of heritage significance where additional heritage support may be needed in order to restore or sustain heritage significance.
theory of change	means an explanation of how this Strategy will achieve its desired outcomes and long-term impact and brings together the Strategy's vision, objectives, and Strategic Focus Areas (SFAs) into a clear causal pathway, showing how change is expected to occur.
townscape	means the distinguishing character of an urban area or urban landscape, usually relating to a neighbourhood or defined geographical area.

EXECUTIVE SUMMARY

The Heritage Resources Management Strategy (Strategy) replaces the Cultural Heritage Strategy of 2005. It aims to guide the City of Cape Town (City)'s implementation of the National Heritage Resources Act (NHRA), Act 25 of 1999, as well as the management of heritage under the City's Municipal Planning By-law (MPBL). It addresses the imperatives laid out in the City's Integrated Development Plan (IDP) for good governance and ease of doing business, while promoting compliance within the City to the United Nations' Sustainable Development Goals (SDGs), 2030.

Whilst the NHRA is the national legislation governing the management of heritage resources and provides for the management of local heritage resources at a local level, the Strategy presents the roadmap for the City to carry out this mandate using the mechanisms provided for in the NHRA. The implementation of these mechanisms will promote the reduction of red tape and focus heritage management and related administrative processes on places and areas that have heritage significance.

The Strategy applies to the management of heritage resources across the city within the City's regulatory mandate, while also addressing the City's responsibilities as custodian of heritage assets under its ownership. The City has a responsibility to ensure that these places and areas are kept in a good state and used for the benefit of the public and its present and future citizens.

The Strategy also aims to conserve and preserve the city's diverse heritage and promote sustainable development by leveraging its heritage assets to enhance the well-being of its people and promote the role of heritage in contributing to the economic development and social upliftment of the city.

"Our heritage celebrates our achievements and contributes to redressing past inequities. It educates, it deepens our understanding of society and encourages us to empathise with the experience of others. It facilitates healing and material and symbolic restitution and it promotes new and previously neglected research into our rich oral traditions and customs.

This legislation aims to promote good management of the national estate, and to enable and encourage communities to nurture and conserve their legacy so that it may be bequeathed to future generations. Our heritage is unique and precious and it cannot be renewed. It helps us to define our cultural identity and therefore lies at the heart of our spiritual well-being and has the power to build our nation. It has the potential to affirm our diverse cultures, and in so doing shape our national character."

- Preamble to the NHRA

VISION

To be an inclusive and vibrant city that celebrates, conserves and protects its diverse heritage. Ensuring that heritage enriches the well-being of present and future generations and strengthens and supports a sustainable and resilient economy.

PRINCIPLES

Conservation: Heritage is not renewable, once it is lost entirely, it cannot be restored or replaced.

Retention of Significance: Any development action affecting heritage, should minimise the loss of significance.

Economic growth: Heritage has intrinsic value. It contributes to economic development, tourism, urban regeneration and economic opportunities at community level.

Inter-generational: Heritage is both tangible and in-tangible. It includes physical places and objects as well as traditions, beliefs and way of life.

Inclusivity: Heritage should recognise diversity and give voice to previously marginalised heritage.

DESIRED OUTCOMES

Protection of significant heritage resources.

Leverage heritage to achieve economic growth by supporting Cape Town as a tourism destination, creating jobs and promoting community integration.

Promote **ease of doing business** by reducing unnecessary and administrative processes.

Recognise **tangible & intangible** heritage to build stronger community connections and acknowledge the legacy of the past in a meaningful way.

Advocacy as a means to increase awareness and appreciation of heritage.

ENABLERS

Robust local **legislation for conservation and protection** of heritage resources.

Maintain **competency and skills** to manage heritage resources.

Enhance **systems and tools** for managing heritage resources.

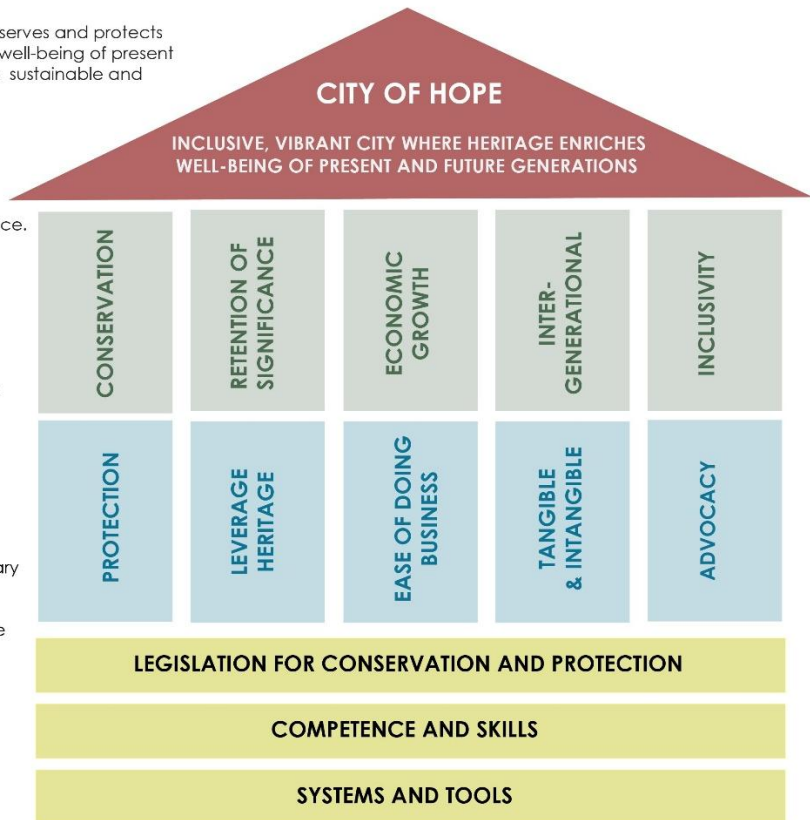


Figure 1: Strategy Overview

1. INTRODUCTION

1.1 Background

The Cultural Heritage Strategy was developed in 2005 as part of the Integrated Metropolitan Environmental Policy (IMEP). The Cultural Heritage Strategy, as the guiding policy for heritage management, was reaffirmed in 2017 through the Environmental Strategy. The past 17 years has seen significant developments and changes in the approach to heritage management as well as challenges within the implementation of the NHRA at local level. With the adoption of the new IDP (2022–2027) and the emergence of new policy and strategy frameworks, including the Provincial Problem-Driven Iterative Adaptation (PDIA) process, a new Strategy for the management of heritage resources is required.

1.2. Heritage Resources

Heritage resources are categorised by the NHRA as structures (built environment), archaeological and palaeontological sites, meteorites, burial grounds and graves, public monuments, memorials and objects. Heritage also includes cultural landscapes, cultural practices and traditions. Managing heritage resources effectively is crucial for preserving the cultural fabric of our society and to foster a sense of continuity; to enable sustainable economic development and job creation; and promoting cultural diversity and quality of the built environment. The importance of effectively managing heritage resources extends across cultural, educational, environmental, economic, and social spheres, and is vital for ensuring the preservation of heritage for future generations.

1.3. Heritage Resources Management in South African

Heritage management in South Africa is governed by the NHRA, which establishes a three-tiered system of responsibilities across national, provincial, and municipalities. In Cape Town, heritage resources are managed by the South African Heritage Resources Agency (SAHRA), Heritage Western Cape (HWC) and the City. The NHRA manages heritage through a system of formal and general protections. Permission is required for any alteration, disturbance or destruction of heritage resources.

1.3.1. Management of heritage resources at national and provincial level

Any development action must be approved by the appropriate heritage authority. This permitting process is triggered by both the formal and general protections of the NHRA. The formal protections in terms of s27 of the NHRA are managed by SAHRA and HWC.

1.3.1.1. Formal protection for Grade III /Local heritage resources

The NHRA provides for two formal protection mechanisms for local heritage resources: The Heritage Register (s30) and Heritage Area (s31).

1.3.2. Management of heritage resources at local level

The Constitution assigns local planning to municipalities. The NHRA enables the integration of the management of local heritage resources into planning. The City was found to be competent in terms of the NHRA in 2013. It has maintained this competency and is reassessed biennially.

The City has been managing heritage resources since the 1980s, identifying areas for heritage conservation and mapping heritage resources. The City has two tools for enabling heritage management i.e. the heritage inventory database and the Heritage Protection Overlay zoning in the MPBL.

1.3.2.1. Heritage database

The City has been maintaining a heritage database for well over 20 years. This database contains an inventory of conservation worthy heritage resources as well as those structures older than 60 years that are not considered worthy of conservation. This map of heritage resources is made available to the public and is updated regularly. Properties are mapped according to the grading system prescribed by the NHRA. Annexure B summarises the grading system provided for in the NHRA and its management implications.

1.3.2.2. Heritage Protection Overlay Zoning

Urban Conservation areas were declared in the 1980s/1990s. These 37 Urban Conservation areas were consolidated into the integrated zoning scheme regulations in 2013. With the promulgation of the MPBL in 2015, the HPOZ was developed as the protection mechanism in the MPBL for managing heritage resources. It is consistent with the requirements of s30 and s31 of the NHRA. The Urban Conservation Areas are consolidated into the HPOZ. All Heritage Register properties and Heritage Areas are managed through the HPOZ.

For a detailed breakdown of the legislative context of heritage management, please see Annexure A.

1.4. The importance of heritage resource management

Heritage connects us to our history, fostering a sense of belonging and pride. By protecting heritage, we maintain the connection between our past and our future. This connection is crucial for fostering understanding of an often difficult and disparate past, collective memories and shared experiences which form the foundation of a community's identity. It is especially important to safeguard the heritage and memories of marginalized communities, to ensure that their unique identities and stories are not lost.

1.4.1. Economic growth and sustainable development

The management of heritage resources has substantial economic value, especially in the context of tourism. Heritage sites, townscapes and landscapes are key drivers of cultural tourism, which contributes significantly to our local and regional economies.

In addition to the economic benefits of tourism, heritage management contributes to sustainable urban development. The adaptive reuse of historic buildings, for example, can help reduce the environmental impact of new construction by extending the lifespan of existing structures. This approach conserves resources and reduces waste, making it an environmentally responsible alternative to demolition.

1.4.2. Conservation of heritage for future generations

In time of rapid urbanisation, the good management of heritage resources is an ethical responsibility in ensuring that citizens have access to heritage resources that support cultural heritage and practices. The loss or destruction of heritage resources due to neglect, gentrification, or development can lead to an irreplaceable loss. Effective heritage management practices, including proper recording, and the implementation of policy and legislation, help mitigate these risks.

1.4.3. Inclusive and spatially integrated city

Heritage promotes cultural diversity and inclusivity. The good management of heritage ensures that all communities, including previously marginalised groups, have the opportunity to celebrate and protect their heritage. The recognition of the cultural diversity promotes mutual respect and understanding as well as social cohesion.

1.4.4. Educational value and learning

Heritage resources also serve as essential tools for education. They provide rich, tangible materials for teaching history and culture, often bringing abstract historical events to life and allowing learners and visitors to understand the complexities of the city's past through first-hand experiences. Heritage management should provide current and future generations with the opportunity to engage with history in an interactive and meaningful way.

Moreover, heritage management offers opportunities for critical thinking and dialogue. For instance, understanding the social, political, and economic contexts behind heritage sites enables people to appreciate the struggles and achievements that have shaped our complex society. Educational programmes that involve heritage also cultivate a sense of ownership, where individuals learn not only about the past but also how to care for the resources that sustain our collective history.

1.5. Strategic Alignment

The Strategy aligns with the City's following IDP objectives (while keeping in view the long-term vision of international best practice and cross references the UNESCO Sustainable Development Goals):

- 1.5.1. Support **Economic Growth** by aiming to reduce unnecessary red tape and administrative burden by implementing the exemptions provided for in the NHRA.
- 1.5.2. Enhance public well-being through the protection and good management of heritage spaces and places, **Public Space, Environment and Amenities**, ensuring that these are preserved for the enjoyment and benefit of future generations.
- 1.5.3. **Resilient city** – encourage adaptive reuse of heritage buildings, reducing landfill and working towards achieving affordable housing, harness heritage as a driver for small business, creative industries, tourism and (artisanal) skills development.
- 1.5.4. **A more inclusive spatially integrated city** that protects inter-generational access to well-located land through protection of historical buildings and promotes affordable housing opportunities through the adaptive reuse of heritage buildings. The Strategy acknowledges Cape Town's racially divided past and promotes spatial justice in decision-making.
- 1.5.5. Enable a **capable and collaborative City government** through the enhancement of development management systems and tools enabling the effective management of heritage that is consistent with legislation and that is integrated with planning.

The Strategy, to comply with national legislation, sets overall direction and intent, as well as providing policy guidance for decision-making on development applications that involve heritage resources. The Implementation Plan and other documents guiding the day-to-day implementation of the Strategy are not included here.

2. CHALLENGES TO HERITAGE MANAGEMENT AND OPPORTUNITIES

The City, like many other South African cities, faces significant challenges, inter alia high unemployment rates, poverty, housing shortages and infrastructural needs. Balancing these critical service delivery priorities and development with good heritage management is a challenge that can only be resolved within the context of clear policy frameworks, enforceable legislation, effective compliance mechanisms and acknowledgment and recognition that heritage (actively) contributes to the social and economic well-being of communities.

The perceptions of heritage as a hurdle or blockage to economic development and growth is exacerbated by time consuming and costly parallel permitting processes that lead to conflicting and inconsistent decisions. The apparent 'checkbox' compliance processes that contribute little to the quality of the built environment must be mitigated by information-led heritage management and the focus of heritage management where heritage is significant and worthy of conservation.

The positioning of heritage management in opposition to development (i.e. construction) undermines the role that heritage conservation can play in resilience and climate change mitigation. The conservation of heritage buildings reduces landfill and reduces the use of cement in construction activities. Job creation related to artisanal building practices are largely unrealised and are limited to a small number of specialist conservators: these traditional crafts themselves form part of the living heritage of communities.

Effective heritage management requires a multi-disciplinary and collaborative approach, bringing together conservation specialists, architects, landscape architects, urban planners, policymakers, and local communities. It requires strengthening existing legislation, developing robust enforcement mechanisms, and creating sustainable funding models, including public-private partnerships and community-driven initiatives.

The Strategy aims to address the following challenges to effective heritage resources management.

2.1. Legislative reform

The NHRA was enabled in 2000 and has not been amended nor reviewed since its promulgation. Technical and practical shortcomings that hamper the effective implementation of the NHRA are sorely needed. Regulations that are considered *ultra vires* (beyond given powers) need to be withdrawn or clarified.

The MPBL was promulgated in 2015 and has undergone regular amendments. The ability to mitigate negative impact on inter alia, heritage and environment, must be ensured. The HPOZ must be effective and robust. Challenges with the implementation of the HPOZ as a tool to protect heritage and to ensure that development is appropriate to its receiving context, and consistent with the character and context of the place, is a risk to the implementation of the desired outcomes of this Strategy.

2.2. Legislative inefficiencies

The three-tiered system for management of heritage is based on significance at national, provincial and local level. Within the city, there are frequently overlapping heritage applications concerning the same properties or developments: HWC assesses applications under the 60-year clause (section 34) or heritage impact assessments (section 38), while the City also oversees heritage approvals within Heritage Protection Overlay Zones (HPOZ) under the City's MPBL. This dual regulatory requirement imposes inefficiencies, wastes resources, and acts as a barrier to development.

Currently, the City is receiving a growing number of applications related to alterations or demolitions triggered by the 60-year clause. The proliferation of mid-20th-century structures, many not conservation-worthy (but older than 60 years), has led to increased numbers of applications for

approval. This results in unnecessary costs for applicants and a substantial administrative burden for both HWC and the City.

2.3. Implementation of exemption mechanisms for local heritage resources

The NHRA provides for exemptions from the requirements of section 34 (the 60-year clause) and section 38 (heritage management impact assessment). These exemptions are dependent on the implementation of the formal protection mechanisms for conservation-worthy heritage resources, i.e. Heritage Register (s30) or Heritage Area (s31). No new heritage areas have been declared since the promulgation of the NHRA, and the regulations for placing properties on the Heritage Register were only published in 2023. A number of properties have been added to the Heritage Register since 2023, these being conditional to the approval of NHRA exemptions in certain geographical areas. Effecting the formal protection - conditional to an exemption process - has resulted in the formal protection of properties that are not necessarily of high heritage significance. Since the promulgation of the NHRA, no properties have been added to the Heritage Register based on the merit of the significance of the property.

2.4. Stagnation of formal protection mechanisms

Since its promulgation in 1999, there has been no increase in areas formally protected under the NHRA (s31 Heritage Areas) in the City. The City's erstwhile Urban Conservation Areas were declared in the 1980s/1990s: since the promulgation of the MPBL in 2015, only one area has been included in the HPOZ.

2.5. Loss of institutional knowledge

Loss of institutional knowledge, as experienced and long-serving staff retire, together with increasing volumes of heritage applications, is a challenge to informed-decision making. Consistency and predictability in decision-making requires access to an accurate and reliable repository of heritage information and records of past decisions affecting heritage resources.

2.6. Poor management of heritage assets

The City is the custodian of over 500 conservation-worthy heritage resources. These heritage resources are managed by different line departments and often lack the necessary budget to maintain. The NHRA requires state-supported bodies (including municipalities) to submit regular reports to SAHRA on the maintenance and repairs to heritage assets in their ownership. Where heritage assets have been formally protected, Conservation Management Plans are required to ensure that heritage significance is maintained and enhanced.

The City is the owner and custodian to various public spaces and amenities that have high cultural and environmental significance. The City holds these sites in custodianship for the benefit of its citizens, present and future. The public access and enjoyment of these sites is protected under the NHRA and

the Constitution. These heritage sites should not be alienated without careful consideration and public engagement.

2.7. Lack of support and incentives

Many significant heritage resources are located within well-located areas, where inter-generational land ownership or leases are common. The identification of targeted support areas as part of the City's planning mechanism to stimulate urban renewal has not been realised. The implementation of heritage design guidelines and support to assist applicants in appropriate alterations and additions, ensuring the enhancement of the quality of the built environment and active interfaces at street level is challenging.

There are limited incentives for owners to maintain and enhance the heritage significance of their properties, or to realise the benefits of conservation of cultural heritage in terms of economic opportunities within communities. The recognition of heritage as a catalyst for social and economic growth vs development remains a challenge and the implementation of tax or rates rebates remain unrealised.

In response to these challenges, the Strategy sets out a clear pathway for change, beginning with a clear vision and objectives, and supported by a Theory of Change and a set of strategic shifts.

3. PURPOSE

The overarching purpose of the Strategy is to strengthen good governance and compliance. The Strategy aims to ensure that heritage resources within the city are protected, well-managed and conserved for future generations. It seeks to optimise economic opportunities, improve access, and promote social well-being, while reducing unnecessary red tape and supporting appropriate development.

4. SCOPE

The Strategy applies to the management of heritage resources across the city and within the City's regulatory mandate, while also addressing the City's responsibilities as custodian of heritage assets in its ownership. It aims to ensure that decision-making is compliant with national legislation when impacting heritage resources.

In practice, the management of heritage resources at municipal level focuses on the built environment. However, this Strategy provides the framework for inclusion of aspects of the intangible heritage associated with structures, places and spaces and the recognition of memory as an important component of our heritage, especially where it comes to previously neglected heritage.

The Strategy aims to address the risks of inconsistent decisions inherent in the dual application process, reduce unnecessary administrative burdens and provide certainty to property owners and communities by working towards the management of conservation-worthy heritage resources at local level. The Strategy gives guidance to the implementation of municipal functions and responsibilities assigned to the City by the NHRA and the City's Development Management Scheme (DMS) and the strengthening of the heritage management tool within the DMS to be effective and consistent with the principles of heritage management.

5. VISION

To be an inclusive and vibrant City that celebrates, conserves, and protects its diverse heritage. Ensuring that heritage enriches the well-being of present and future generations and strengthens and supports a sustainable and resilient economy.

6. PRINCIPLES

The City recognises that the following principles are applicable to the management of heritage resources:

- 6.1. **Conservation:** Heritage is not replaceable or renewable. Once it is lost entirely it cannot be restored or replaced.
- 6.2. **Retention of significance:** Any development action that affects heritage resources should recognise their significance and minimise the loss of significance.
- 6.3. **Economic growth:** Heritage has intrinsic value. It contributes to economic development through tourism, urban regeneration and economic opportunities at community level.
- 6.4. **Inter-generational:** Heritage is both tangible and intangible: It includes physical places and objects as well as traditions, belief systems, ways of life, practices, and oral and written histories linked to these places and objects.
- 6.5. **Inclusivity:** Heritage should recognise diversity and give voice to previously marginalised heritage.

7. OBJECTIVES

The main objective of the Strategy is to achieve the management of heritage resources of local significance at local level through:

- 7.1. Integration of heritage conservation in the spatial planning frameworks;
- 7.2. Implementing effective heritage management and conservation in the existing development management systems; and
- 7.3. Enabling maximum public access and benefit to communities through heritage conservation.

8. ENABLERS

The successful implementation of the objectives of the Strategy are dependent on three enablers:

- 8.1. **Robust legislation** (at municipal level) for the conservation and protection of heritage resources.
- 8.2. The City is the first municipality in the country to be found competent in terms of the NHRA to manage heritage. It is necessary that the City retains **competence** and the required heritage **skills** and expertise.
- 8.3. Ensuring that decision-making **systems** can effect the management of heritage resources and that the **tools** for enabling evidence-based decision making are continually updated.

9. DESIRED OUTCOMES

This section defines the desired end state and measurable change the Strategy intends to achieve.

9.1. Protecting heritage resources

- a) Direct City resources strategically towards the management and preservation of sites and precincts of recognised heritage value.
- b) Ensure optimal use, management, and accessibility of City-owned heritage resources, including digitising heritage materials and application processes.
- c) Establish transversal management frameworks to support the maintenance, use, and enhancement of City-owned heritage assets.

9.2. Leveraging heritage for economic growth

- a) Leverage heritage assets to enrich Cape Town's living environment, strengthen its appeal as a tourist destination, create jobs, and promote community integration.
- b) Integrate cultural heritage management into spatial planning and land-use frameworks to improve efficiency and enable socio-economic development around heritage sites.

9.3. Ease of doing business

- a) Reduce expenditure of City and Provincial resources on applications concerning sites with little or no heritage significance by securing exemptions from Heritage Western Cape (HWC) under the 60-year clause and Section 38 impact assessments, where appropriate.
- b) Improve predictability and consistency in City decision-making on building and planning applications related to heritage resources.
- c) Reduce non-viable applications by providing clear guidance to applicants on permissible alterations to heritage resources.
- d) Streamline heritage processes by removing application requirements for areas identified as having minimal or no heritage significance.

9.4. Tangible and intangible heritage

- a) Recognise and celebrate previously overlooked tangible and intangible heritage (where it relates to the management of physical heritage assets), building stronger community connections.
- b) Acknowledge the legacy of forced removals and segregation in Cape Town in a meaningful way. Achieving this will require the appropriate management of relevant intangible heritage resources for the physical assets the City manages.

9.5. Advocacy

- a) Harness heritage resources to foster social cohesion and drive socio-economic development.
- b) Encourage the documentation, preservation, and sharing of community memory as it relates to the management of physical heritage assets.
- c) Use cultural heritage as a platform for education, community integration, and social cohesion.
- d) Expand public online resources, including educational materials, heritage maps, inventories, and guidance tools.
- e) Increase awareness and appreciation of heritage while strengthening the capacity of communities and the development sector to engage with heritage management systems, including participation in asset protection including reuse or re-purpose of under-utilised heritage assets for the benefit of the community.

10. THEORY OF CHANGE

At its core, the Theory of Change (ToC) responds to a central challenge identified in this Strategy: that heritage management in Cape Town is currently characterised by fragmentation, inefficiency, and an over-reliance on NHRA general protections, which together constrain both effective conservation and development outcomes.

10.1. Ultimate change:

If the City strengthens its institutional competence, formally identifies and protects conservation-worthy heritage resources, integrates heritage into planning and development systems, and streamlines regulatory processes using the mechanisms provided by the NHRA, then heritage management will become more efficient, predictable, and locally responsive - enabling both improved conservation outcomes and sustainable economic and social development.

10.2. Core Assumptions

The ToC also notes several assumptions which underpin the causal pathways:

- 10.2.1. The main assumption that impacts the successful implementation of the desired change, is that the City has an effective and efficient tool within its development management system for managing and conserving heritage resources; and

- 10.2.2. The City will maintain its competence in terms of the NHRA and fulfil its function to identify and map significant heritage resources and identify areas where the exemption from the requirements of the NHRA can be implemented.

10.3. From Activities to Impact

The ToC distinguishes between different levels of change:

- 10.3.1. Activities and interventions (as set out in the SFAs) focus on building institutional capacity, formalising protection mechanisms, integrating systems and improving knowledge and governance.
- 10.3.2. These interventions produce system-level improvements, including clearer processes, better information and stronger regulatory tools.
- 10.3.3. Over time, these improvements lead to measurable outcomes, such as faster and more predictable decision-making, reduced administrative burden and a stronger focus on conservation-worthy heritage.
- 10.3.4. These outcomes, in turn, contribute to long-term impacts, including a more enabling development environment, improved quality of the built environment, enhanced social cohesion and a heritage management system that reflects the diversity and history of Cape Town.

11. STRATEGIC SHIFTS

The following section lists the key strategic shifts (changes) required to move from the current system (status quo) to the desired end state.

- 11.1. **Proactive and significance-led heritage management:** The management of heritage under the NHRA is largely based on general protections. This shift is needed to reduce administrative burden resulting from the general protections by implementing a heritage management process lead by the proactive identification and mapping, e.g. the Heritage Inventory database (eGS viewer) of significant heritage resources, worthy of conservation.
- 11.2. **Stream-lined application processes:** The dual application process for heritage management at both national, provincial and municipal level is inefficient and risks inconsistent or contradictory decisions on development actions affecting heritage resources. This shift aims to enable heritage management at local level resulting in more efficient, predictable, and cost-effective applications and decision making.
- 11.3. **Integrated heritage management and spatial planning:** This shift is needed to ensure heritage management (conservation and retention of heritage significance) is integrated within the spatial planning and development management processes, resulting in better alignment between conservation, growth management, infrastructure investment, development management and quality-built environments and public realms.

- 11.4. **Implement appropriate protection for conservation worthy heritage resources:** Historically, heritage management was skewed towards protecting individual sites. This shift looks to the protection of local heritage resources (individual buildings) or historical urban landscapes. The implementation of the protections will enable the implementation of the exemption mechanisms provided for in the NHRA and streamline application processes.
- 11.5. **Accurate and easily accessible information:** To address the loss of institutional memory, this shift is necessary to ensure informed, evidence-based decisions. It is supported by accessible, up-to-date heritage information management systems.
- 11.6. **Heritage as a driver for social justice and social cohesion:** Heritage management is often seen as a constraint to economic and social development. This shift is necessary to unlock the unrealised potential of heritage to contribute to social justice issues through e.g. affordable housing opportunities, adaptive reuse and supporting social and economic benefit at community level.
- 11.7. **Improved management of City-owned heritage assets:** This shift is required to realise the potential of City-owned heritage assets in supporting quality-built environments, job creation, supporting affordable housing opportunities through existing heritage rental stock and improved compliance with legislation.

12. STRATEGIC FOCUS AREAS

SFAs have been identified to give effect to the objectives of this Strategy. These SFAs have been aligned with the City's IDP objectives and the SDGs 2030. The SDG goals have been included as they present the global standard for achieving sustainable development.

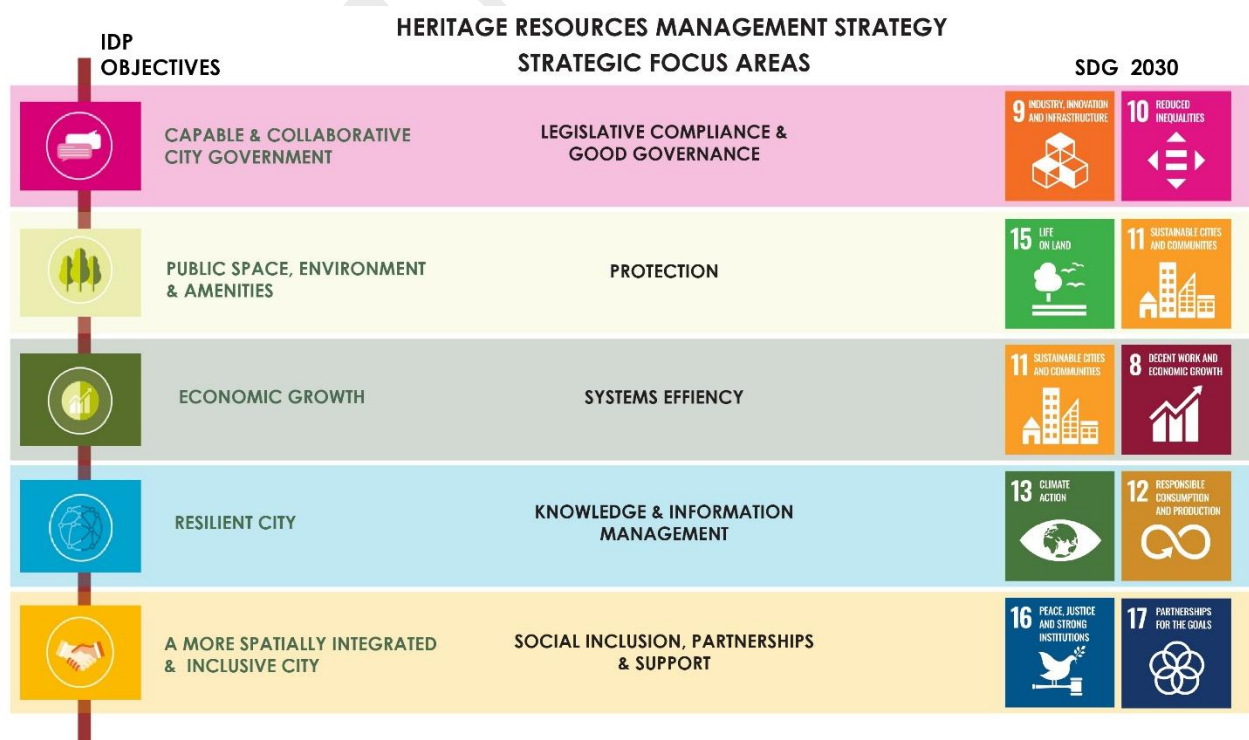


Figure 2: Aligning SFAs with IDP and SDGs

The SFAs have been expanded on in more detail in Annexure C and include the detailed activities associated with each SFA. These detailed activities are either a direct legislative requirement in terms of the NHRA, a consequence of the NHRA, or a management imperative in terms of best practice.

12.1. SFA 1: Legislative compliance and good governance

Strategic Intent: Ensure legislative compliance and optimise the management of heritage resources to unlock social, economic and environmental value.

- a) Management of City-owned heritage assets to unlock social, economic and environmental value.
- b) Promote resilience and sustainable economic development.

12.2. SFA 2: Protection

Strategic Intent: Implement the appropriate level of formal protection and management of conservation worthy heritage resources and areas.

- a) Identification, grading and mapping of heritage resources.
- b) Implement the appropriate protection level for Grade III heritage resources and areas.

12.3. SFA 3: Systems efficiency

Strategic Intent: Establish a streamlined, efficient system of managing heritage at local level that reduces duplication, improves decision-making and enhances ease of doing business.

- a) Implement management of heritage at local level.
- b) Integrate heritage management with municipal planning and development management processes.
- c) Ensure efficiency and predictability in decision making.

12.4. SFA 4: Knowledge and information management

Strategic Intent: Promote comprehensive, reliable and accessible heritage information management that supports evidence-based decision making, transparency, accountability and legal defensibility.

- a) Support informed decision-making.
- b) Maintain heritage information management system.

12.5. SFA 5: Social inclusion, partnerships and support

Strategic Intent: Promote inclusive heritage management through partnerships, support, communication and recognition of diverse and previously marginalised heritage.

- a) Advocate for social justice and cohesion.
- b) Promote partnerships.
- c) Interpretation, communication and education.
- d) Investigation of incentives.

13. ROLES AND RESPONSIBILITIES

Heritage management impacts actors across the City. The NHRA enables civil society to identify their heritage for conservation and protection for present and future generations, and the public is an important stakeholder in the management of heritage as a public resource.

The City has two roles within the context of heritage management: Asset owner (custodian) of heritage resources and decision-maker/appeal authority (regulator).

- 13.1. The City is responsible to keep the heritage assets under its custodianship in a good state of repair. Various line departments have heritage assets as part of their portfolios. The City is required to report to SAHRA on an annual basis on the maintenance and repair of heritage assets under its custodianship.
- 13.2. The City's system of development management and decision-making lies with Building Development Management and Land Use Management.

Stakeholder	Role	Responsibility
INTERNAL		
Arts and Culture	Monuments and Memorials	Maintenance and repair of monuments, memorials and public part.
Development Management	Administers National Building Regulations	Decision-maker
Future Planning & Resilience	Drive climate change responses	Future planning
Heritage Resources Section	Heritage expertise	- Heritage information management systems - Commenting on applications where heritage is impacted - Recommend conditions to minimise or mitigate negative impact on heritage
Human Settlements	Rental accommodation units	- User department - Maintenance and repair
IS&T	Systems and information management	- Systems development and support - Maintain eGIS viewers
Municipal Planning Tribunal	'Appeal'	Decision maker
Land Use Management	Administers Municipal Planning Bylaw; Zoning Scheme	Decision maker
Property Transactions	Custodian of city owned properties	- Property management - Sale and alienation of heritage assets
Recreation and Parks	Custodians/Asset owner	- User department - Maintenance and repair
Road Infrastructure Management	Custodians/Asset owner	- User department - Maintenance and repair
Strategic Assets	Owner/Asset owner	- User department - Maintenance and repair
Urban Planning and Design	Develop precinct and spatial plans. Activate public spaces through placemaking	Enable quality environments and public realm

EXTERNAL		
SAHRA	Heritage agency (National)	• National authority • Co-ordinate and oversee management of heritage across RSA • Management National Heritage Sites • Regulations, policy, etc
HWC	Heritage authority (Provincial)	• Provincial authority • Administration of the General Protections of the NHRA in the Western Cape • Oversee the functions of the NHRA as it pertains to municipalities • Management of Provincial Heritage Sites • Regulations, policy etc in Western Cape, must be consistent with National Regulations
Conservation Bodies	Civil society	• Commenting body, Public good
Partnerships	Academia	• Research, best practice
Ratepayers' associations	Residents/Communities	• Commenting body, Public good

14. MONITORING AND EVALUATION

The Strategy will be reviewed every five years or as required, to respond to changes in the legislative and policy context to ensure that it remains current and appropriate.

The Strategy's Implementation Plan will serve as a roadmap, detailing the day-to-day actions required to realise the objectives outlined in the SFAs (Annexure C). Furthermore, it will establish the performance indicators used to measure the Strategy's success.

Monitoring and evaluation will take place on an annual basis and inform updates and enhancements to the Implementation Plan, as required, in order to ensure that the management of heritage resources is effective.

ANNEXURE A: LEGISLATIVE AND POLICY CONTEXT

While the NHRA is the primary act setting out the framework for heritage management other legislation at national, provincial and local level also apply. The City must ensure compliance with all relevant legislation.

1. Constitution of South Africa

Under the Constitution, culture is both a National and Provincial competence. The Constitution however provides for the assignment of provincial functions to local authorities through legislation. In the case of heritage, the management of Grade III heritage resources is assigned to local authorities through the NHRA.

The Constitution guarantees everyone the right to an environment that is not harmful to their health or well-being; and to have the environment protected for the benefit of present and future generations. We all have the right to participate in the cultural life of our choice provided that this is not inconsistent with any provision of the Bill of Rights.

2. Constitution of the Western Cape

Chapter 10 of the Constitution of the Western Cape provides directive principles for Western Cape policy and legislation. This includes the protection and conservation of the natural historical, cultural historical, archaeological and architectural heritage of the Western Cape for the benefit of the present and future generations.

3. National Heritage Resources Act, 25 of 1999

The National Heritage Resources Act (NHRA) is the key national legislation determining how the heritage of South Africa is to be managed.

It establishes a three tier (sphere) system for the management of heritage resources. The South African Heritage Resources Agency (SAHRA) and Heritage Western Cape (HWC) are responsible for the management of Grade I and Grade II sites as well as archaeology, palaeontology, shipwrecks, meteorite sites and historical burials. Local authorities are assigned responsibility for the identification and management of Grade III heritage resources and heritage resources which are deemed to fall within their competence in terms of the NHRA. Local authorities are tasked with maintaining an inventory of these heritage resources. Local authorities may only manage heritage resources once assessed as being competent to do so by the Provincial Heritage Resources Authority (PHRA), in this case HWC. This competence must be assessed every two years.

Heritage Areas and the Heritage Register are the main tools provided by NHRA to a municipality for the management of Grade III heritage resources. Once Grade III heritage resources have been formally

protected through the declaration of a Heritage Area or by being placed on the Heritage Register, these resources must be protected by local authorities through their planning scheme or under a by-law under the NHRA.

At the time of the revision or compilation of a spatial plan or planning scheme, the municipality must identify and protect any place of environmental or cultural interest, and either formally protect them as Heritage Areas or ensure their placement on the provincial Heritage Register. The City manages these protections through its Heritage Protection Overlay Zone (HPOZ).

The NHRA establishes principles and procedures for the management of the national estate and provides a number of tools for its management.

4. National Environmental Management Act, 107 of 1998

The National Environmental Management Act (NEMA) is the national legislation to protect and manage the environment, and as part of this, defines environment to include aesthetic and cultural properties that influence human health and well-being.

It promotes the identification, prediction and evaluation of the actual and potential impact on the environment (including socio-economic conditions and cultural heritage), the risks and consequences and alternatives and options for mitigation of activities. This is done with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management. It also requires impact assessment to evaluate the impact on the national estate as defined in the NHRA.

NEMA also requires that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied.

Section 27 of NEMA articulates issues around duty of care in the protection of the environment.

5. Spatial Planning and Land Use Management Act, 16 of 2013

The Spatial Planning and Land Use Management Act (SPLUMA) governs spatial planning and land use management which are critical to the management of heritage resources. SPLUMA sets out the requirements for spatial plans. It requires the consideration of the environment in decision-making and also provides for the establishment of a municipal planning by-law which in terms of the NHRA must include a mechanism for the protection of heritage resources.

6. Municipal Planning Amendment By-law, 2025

The City's MPBL governs the management and use of land in the city, including the built environment. Heritage resources management at the City-level is administered through S99 of the MPBL and through

the HPOZ as set out in the MPBL. The following items in the MPBL are most relevant to heritage management:

6.1. Criteria for Deciding Applications (Item 99)

This item provides for when an application must be refused, together with additional issues to consider in deciding further whether to approve or not approve an application. Sub-sections (2) and (3) of S99 of the MPBL explicitly require the following considerations:

1. Impact on heritage when making any decision under the MPBL.
2. Socio-economic impact, compatibility with surrounding uses, impact on safety, health, wellbeing and existing rights must also be considered.
3. The imposition of conditions that can mitigate an adverse impact of the proposed use or development of land must be considered.
4. In the case of consolidation, the scale and design of the development, the impact of the building massing and the impact on surrounding properties must be considered.
5. Principles and policy of national and provincial legislation, including the NHRA and its various regulations must also be taken into account.

6.2. The Heritage Protection Overlay Zoning (Items 159 - 164)

The HPOZ is the City's main heritage protection and management tool. It provides for the protection of conservation-worthy heritage places and requires a land use application for any activities affecting a place within the HPOZ. It has been designed to comply with the requirements in the NHRA for protecting Heritage Areas and sites listed in the Heritage Register, but can also function independently from the NHRA as a protection within the DMS if needs be.

Under the DMS, if the provisions of the HPOZ are different to, or in conflict with, the provisions of a base zoning, the more restrictive provisions shall apply.

The HPOZ also provides for:

1. Use incentives for the restoration and maintenance of heritage resources.
2. General and specific provisions for HPOZ areas.
3. The development and implementation of Heritage Management Plans, and
4. Exemptions from specified HPOZ requirements.

6.3. Scenic Drive Overlay Zoning (SDO) (Items 171 – 172)

The SDO zoning is applicable to declared Scenic Drives and protects the natural and cultural landscape along important tourist and transport routes, to enhance the scenic experience of travellers and promote the tourism potential of the city.

6.4. Local Area Overlay Zoning (LAO) (Items 173 - 191)

The LAO zoning provides for the City to apply specific local development rules that reflect local circumstances. These include local provisions for encouraging development in support of the local economy, or special management provisions to encourage appropriate development in response to local, cultural, urban design or landscape circumstances.

It is important to recognise that the LAO zoning is a tool to be applied by the City in the interests of the city, and local interests need to be balanced against the interests of the general community.

7. Relevant City Strategies and Policies

The following City policies all have bearing on the management of heritage resources:

1. Integrated Development Plan (2022-2027)
2. Municipal Spatial Development Framework MSDF (2023) and District and Local SDFs Plans
3. Inclusive Economic Growth Strategy (2021)
4. Densification Policy (2012)
5. Tall Building Policy (2013)
6. Resilience Strategy (2019)
7. Immovable Property Asset Management 2015
8. Asset Management Policy (2013)
9. Movable Heritage Assets Collection Policy 2020 (Policy Number 60989)
10. Responsible Tourism Policy (2009)
11. Cultural Heritage Tourism Strategy and Action Plan for Cape Town: Phases 1 to 5 (2010)
12. Scenic Drive Network Management Plan (2003)
13. Telecommunication Mast Infrastructure Policy (2015)
14. Environmental Strategy (2017)
15. Human Settlements Strategy (2021)
16. Urban Design Policy (2024)
17. Arts, Culture and Creative Industries Policy (2014)
18. Memorialisation Policy (2015)

ANNEXURE B: SUB-GRADING MANAGEMENT GUIDE

The City is responsible for the management of Grade III heritage resources. The NHRA distinguishes three categories of grading: I, II and III. In practice, Grade III has been further divided into A, B and C to facilitate the management of these heritage resources.

Grading/Significance	Heritage Management Implications (Baumann and Winter 2004)
Grade IIIA: - Outstanding local architecture, aesthetic, social and historical value - Outstanding intrinsic value for social, historical, scenic, aesthetic values either individually or as part of a group at a local level - Local significance	- Conserve - Remedial action to enhance significance - Minimal intervention - Interpretive Signage - Permit of approval required for any demolition, alteration or change in planning status
Grade IIIB: - Considerable local architecture, aesthetic, social and historical value - Considerable intrinsic value for social, historical, scenic, aesthetic values either individually or as part of a group - Local significance	- Conserve - Remedial action to enhance - Permit of approval required for any demolition, alteration or change in planning status - Retain historical fabric (predominantly building exterior)
Grade IIIC: - Local contextual value for social, historical, aesthetic value	- Conserve wherever possible - Retain historical fabric wherever possible (exterior only) - Conserve and enhance contribution to overall character and streetscape (predominantly public/private interface) - Permit of approval required for any demolition, alteration or change in planning status
Grade 3C/Not conservation-worthy: - Some contextual value for social historical, aesthetic value	- Permit of approval required for any demolition, alteration or change in planning status - Demolition can be considered if rehabilitation of the resource cannot be undertaken
Not Conservation worthy	- Demolition acceptable option - No further heritage applications required - Does not exempt from applications in terms of National Building Regulations (NBR)
Requires further investigation	- Not enough information is presented in order to assess the heritage significance of the place
Contemporary buildings of architectural merit	- No NHRA permissions required - Consideration for the retention of these buildings on the basis of architectural merit and/or design
Intangible heritage	- Consideration for interpretative signage

ANNEXURE C: DETAILED STRATEGIC FOCUS AREAS

Heritage resources management is legislated under the NHRA, which mandates a three-tiered system of heritage management across national, provincial and local government. The detailed activities of the SFAs are therefore either a direct legislative requirement in terms of the NHRA, a consequence of the NHRA, or a management imperative in terms of best practice.

** NHRA direct legislative requirement * NHRA consequence + Management imperative

SFA 1: LEGISLATIVE COMPLIANCE AND GOOD GOVERNANCE

1.1. MANAGEMENT OF CITY-OWNED HERITAGE ASSETS TO UNLOCK SOCIAL, ECONOMIC AND ENVIRONMENTAL VALUE

1.1.1.	The City will identify, maintain, research, interpret and where appropriate restore heritage assets in its custodianship.	**
1.1.2.	The City will submit an inventory of these assets to SAHRA, and report on their management annually ¹ .	**
1.1.3.	The City will ensure that Conservation Management Plans are developed, and inspection and maintenance schedules are maintained for these heritage assets as required by the NHRA ¹¹ and its regulations.	**
1.1.4.	Where a City-owned heritage asset is being considered for declaration as a heritage site, it will comment on the desirability of the declaration and any implications.	*
1.1.5.	The City may request exemption ¹² from the requirements for permits for routine maintenance and day to day work as appropriate for existing heritage sites.	*
1.1.6.	The City commits to the appropriate use of its heritage assets and to encourage public accessibility to and enjoyment of these assets.	**
1.1.7.	The City may enter into agreements (including Heritage Agreements) with other role-players to ensure optimal use and conservation of its heritage assets.	+
1.1.8.	The City will leverage its heritage assets to promote job creation, and economic and social development.	+
1.1.9.	The City will ensure that heritage assets are adequately insured for their replacement value.	+
1.1.10.	The City must provide adequate budget for the regular and scheduled maintenance and repair of its heritage assets.	*
1.1.11.	The City will establish the capacity for urgent or emergency repair of its heritage assets.	+
1.1.12.	The City must ensure a transversal heritage term-tender (for consultants or contractors with relevant heritage restoration skills) to provide for the regular maintenance, repair and restoration if required, of heritage assets.	

¹ Section 9 of the NHRA and its regulations

1.1.13.	The City will ensure the maintenance and repair of its memorials and monuments under its authority as defined in the NHRA. This is currently managed by the department responsible for arts and culture.	**
1.1.14.	The City will ensure that all heritage assets are assigned to an accountable dept.	+

1.2. PROMOTE RESILIENCE AND SUSTAINABLE ECONOMIC DEVELOPMENT

1.2.1.	The City recognizes that heritage places make a positive contribution to the quality of space and the urban economy.	+
1.2.2.	The City will ensure that heritage resources are properly conserved and enhanced in order to ensure economic sustainability.	**
1.2.3.	The City recognizes that the reuse and restoration of heritage places can act as a potential catalyst and provide an enabling environment for urban regeneration.	+
1.2.4.	The City recognizes that natural and cultural heritage is a significant contributor to job creation related to tourism and recreation for local and international visitors. The protection of heritage provides opportunities and security for those employed in those sectors.	+
1.2.5.	The City will encourage economic opportunities for communities through promoting the development of heritage tourism, activities, local crafts and related industries.	+
1.2.6.	The City acknowledges that agriculture is a major employer and is critical to providing food security and that the conservation and protection of cultural landscapes protects the agricultural potential of the city and contributes to resilience.	+
1.2.7.	The City recognizes the environmental benefits of reusing heritage resources in the face of the environmental costs of demolition, landfill and new construction. Reuse of heritage buildings reduces the consumption of new building materials, and carbon emissions while conserving the embodied energy of existing buildings.	+
1.2.8.	The City will promote the adaptive reuse, rehabilitation, restoration of heritage places and the use of local skills, technologies, and materials to encourage a circular economy and resource efficiency.	+
1.2.9.	The City will encourage the development and retention of the skills required for working on historical buildings within the construction and related industries providing for sustainable livelihoods.	+
1.2.10.	The City will promote the use of traditional building design and techniques, where proven to be better adapted to our local climate, and environmentally sound.	+

1.3. ENSURE EFFICIENCY AND PREDICTABILITY IN DECISION-MAKING

1.3.1.	The City will provide predictability by ensuring that all conservation-worthy heritage resources and areas are identified and formally protected.	**
1.3.2.	The City will focus on the conservation and enhancement of heritage in those places where there is heritage worthy of conservation, as identified in the heritage inventory.	*

1.3.3.	The City will develop heritage management plans, including MPBL-specific provisions, policy and guidelines as to how proposed development and interventions should respond to heritage resources and places ² .	**
1.3.4.	The City will encourage all actors to engage with heritage officials at the earliest stages of planning an action where heritage may be affected.	+
1.3.5.	The City will identify areas of minimal heritage significance and apply for the exemption of s34 and s38 of the NHRA in those areas.	*
1.3.6.	The City will advocate for a technical review of the NHRA in order to make it implementable and to reduce unnecessary administrative burden and to remove inconsistencies and ambiguities.	+
1.3.7.	The City will investigate agreements between internal departments and with outside bodies and authorities to integrate and streamline heritage management administrative processes.	+

SFA 2: PROTECTION

2.1. IDENTIFICATION, GRADING & MAPPING HERITAGE RESOURCES

2.1.1.	The City will continue to identify Grade III heritage resources ³ including those resources with associated intangible heritage.	**
2.1.2.	The City will continue to maintain and update the heritage database.	**
2.1.3.	The heritage inventory will identify and recommend heritage places for formal protection on the Heritage Register ⁴ , as well as make recommendations to HWC for formal protection.	**
2.1.4.	The City will continue to make the inventory available to HWC, and to SAHRA for inclusion in the National Inventory and will ensure accessibility to the public through the City's website.	**
2.1.5.	The City will encourage local communities to assist the City in the identification of heritage resources, both tangible and intangible, including associated memory, for inclusion in the heritage database.	+
2.1.6.	The City will ensure that its Standard Operating Procedure (SOP) for Grading remains consistent with the criteria of the NHRA.	*

2.2. IMPLEMENT APPROPRIATE PROTECTION LEVEL FOR GRADE III HERITAGE RESOURCES AND AREAS

2.2.1	The City undertakes to submit individual conservation-worthy places to HWC for placement on the Heritage Register.	**
2.2.2.	The City will protect and manage places on the Heritage Register through the HPOZ.	**

² (See Section 2: Decision-Making Involving Heritage Resources).

³ Grade III heritage resources are heritage resources that are worthy of conservation but do not fulfil the criteria for Grade I or Grade II heritage resources.

⁴ Section 30 of the NHRA.

2.2.3.	The City may provisionally protect ⁵ any place which it considers to be conservation-worthy which it is under threat, and where this threat can be alleviated by negotiation and consultation.	*
2.2.4.	The City may protect conservation-worthy places by protecting them under the HPOZ.	+
2.2.5.	Public memorials and monuments as defined in the NHRA are protected as if they have been placed on the provincial Heritage Register ⁶ . The City will consider national policy on the management of these heritage resources when implementing the HPOZ.	
2.2.6.	The City will review and declare existing HPOZ areas as Heritage Areas.	*
2.2.7.	The City will identify and declare areas of cultural or environmental interest as Heritage Areas ⁷ .	**
2.2.8.	The City will protect and manage Heritage Areas through the HPOZ.	**
2.2.9.	The City will put in place provisions and guidelines for the management of areas protected under the HPOZ. These will be set out in Heritage Management Plans as provided for in the MPBL. A general Heritage Management Plan will apply to the entire Heritage Overlay Zone, while specific Heritage Management Plans will respond further to the specific character and heritage significances of an individual HPOZ area.	+
2.2.10.	The City may protect conservation-worthy places by protecting them under the HPOZ.	+
2.2.11.	The City recognizes the importance of historical designed landscapes and cultivated landscapes and that where these landscapes have significance, they require protection and management including possible replanting with exotic trees.	**
2.2.12.	The City will review and declare existing HPOZ areas as Heritage Areas.	*

SFA 3: EFFICIENCY

3.1. MANAGEMENT OF HERITAGE RESOURCES AT LOCAL LEVEL

3.1.1	The City will maintain a heritage resources section ⁸ with the competence, capacity and budget to manage heritage resources.	*
3.1.2	The City will ensure that it remains a competent authority in terms of the relevant sections of the NHRA to manage heritage resources under its jurisdiction.	**
3.1.3	The City will apply to HWC timeously on a biennial basis for competency reassessment as required in s8 of the NHRA.	**
3.1.4	The City will ensure that the HPOZ is an effective tool for the protection and management of heritage resources.	**
3.1.5	The City will ensure that procedures and internal delegations are in place to ensure heritage expertise in decision-making affecting heritage resources.	*

⁵ Section 9 of the NHRA

⁶ Section 37 of the NHRA

⁷ Section 31(1)

⁸ Currently Environmental and Heritage Management (E&HM) in Environmental Management Department (EMD).

3.1.6.	The City will advocate for legislative review of the clauses of the NHRA that require biennial competence review.	+
3.1.7.	The City will manage Grade III heritage resources by means of Heritage Areas and the Heritage Register, using the City's HPOZ as the heritage management tool as provided for in the NHRA.	**
3.1.8.	The City will submit its heritage inventory to HWC in order for it to place conservation-worthy heritage resources on the Heritage Register.	**
3.1.9.	The City will declare areas currently protected by the HPOZ as Heritage Areas in order to enable exemption from the requirements of section 34(1) and section 38(1) in those areas.	**
3.1.10.	The City will consider applying for the delegation of section 30 (placement of Grade III heritage resources on the Heritage Register) from HWC to the City.	+
3.1.11.	The City will consider applying for the delegation of section 34(3) (authority to exempt areas from the 60 years' protection) from HWC to the City.	+
3.1.12.	The City will implement section 38(8) heritage impact assessment as part of the HPOZ decision, making process or otherwise request HWC to exempt areas protected under the HPOZ from section 38(1) using section 38(9).	**
3.1.13.	The City will advocate for legislative review in order to facilitate and promote the management of heritage resources at municipal level.	+
3.1.14.	The City will consider the legalities, risks and benefits of accepting some form of delegation of section 34 of the NHRA from HWC, as well as other ways to localise, focus and make more efficient and effective the management of heritage resources.	

3.2. INTEGRATE HERITAGE MANAGEMENT WITH PLANNING

3.2.1.	The City will ensure that its policies and strategies provide for the safeguarding and enhancement of places of cultural and environmental interest and cultural landscapes, and those special qualities that contribute to sense of place ⁹ and scenic beauty.	+
3.2.2.	The City will ensure that the IDP and other relevant City policies respond to the cultural heritage of the city, recognizing it as a core component of an inclusive, sustainable, resilient and just urban future.	+
3.2.3.	The City will ensure that heritage management is integrated with the planning processes i.e. the MSDF, DSDFs, Local Area Plans, and other planning initiatives.	*
3.2.4.	The City must ensure the effective conservation of heritage resources within the management of development.	**
3.2.5.	The City will advocate for legislative amendment and promote the integration of heritage management with planning.	+

SFA 4: KNOWLEDGE AND INFORMATION MANAGEMENT

4.1. ENSURE INFORMED DECISION-MAKING

⁹ means the collection of meanings, attachments, and emotions that people experience in relation to a specific geographic location.

4.1.1.	The management of categories of heritage resources not falling under the mandate of the City will be referred to the relevant heritage resources authority.	*
4.1.2.	The City will ensure that decision-making involving heritage resources (including intangible heritage) is carried out with knowledge and understanding of the significance of the heritage resource and its context.	*
4.1.3.	The City will ensure minimal negative impact to the significance of heritage resources in all its decision-making.	**
4.1.4.	Decisions affecting heritage resources must be informed by input from the heritage resource section.	+
4.1.5.	Decisions affecting formally protected heritage resources must be made by officials or structures with relevant heritage expertise and experience.	*
4.1.6.	The City will guard against incremental loss of heritage in its decision-making.	*
4.1.7.	The City will promote heritage as an important informant to developments and projects and recognises that heritage (including intangible heritage) has the potential to enhance and improve developments and surrounding streets and neighbourhoods.	+
4.1.8.	In deciding an application, the rules or guidelines set out in Heritage Management Plans, Conservation Management Plans, or any relevant heritage policy or frameworks (e.g. MSDF, DSDFs, LSDFs, MPBL, etc.) must be considered.	+

4.2. MAINTAIN HERITAGE INFORMATION MANAGEMENT SYSTEM

4.2.1.	The City is committed to the ongoing development of eHeritage as the information management system for heritage resources and as the platform through which heritage information will be made available.	+
4.2.2.	The City is committed to maintaining and growing the Environmental and Heritage Resources Information Centre (EHRIC) as the body of knowledge to support heritage and environmental management, City projects and decision-making.	+
4.2.3.	The City will promote the digitization of records and information held in EHRIC to ensure their accessibility and longevity.	+
4.2.4.	The City will continue to improve public access to heritage information through the City MapViewers, Open Data Portal, eHeritage and other mechanisms.	+
4.2.5.	The City will strive to provide proper curatorial environments for its historical sources, including but not limited to its historical maps, books and images.	+
4.2.6.	The City commits to identifying and digitizing historical records in its custodianship and ensuring these are not disposed of before consultation with EHRIC and in line with the requirements of the NHRA and National Archives and Records Service of South Africa Act, 1996 (Act No. 43 of 1996) .	+
4.2.7.	The City will endeavour to maximize opportunities for skills transfer and poverty relief through the use of EPWP and internship programmes.	+
4.2.8.	The City will promote heritage research that adds to the body of knowledge about heritage processes and resources.	+
4.2.9.	The City will maintain a record of heritage related decisions.	+

SFA 5: SOCIAL INCLUSION, PARTNERSHIP AND SUPPORT

5.1. ADVOCATE FOR SOCIAL JUSTICE AND COHESION

5.1.1.	To build a more just, inclusive and integrated society the City must actively address neglected and marginalised heritage and work together with communities in identifying, preserving and sharing their cultural heritage.	*
5.1.2.	The City will undertake heritage projects recognizing areas and themes that have previously been overlooked, acknowledge past injustices, and seek practical ways to realize cultural restitution whether symbolic or tangible.	*
5.1.3.	The City will ensure that all heritage interpretative signage (digital or physical) is consultative, inclusive and representative.	+
5.1.4.	Where appropriate, the City will investigate the adaptive reuse and rehabilitation of underutilized City owned heritage resources to facilitate opportunities for affordable housing or for community use.	+
5.1.5.	The City will encourage communities to celebrate and become stewards of their heritage, promoting cohesion and shared identities.	+
5.1.6.	The City will encourage community engagement to assist in the identification of intangible heritage to inform development assessments.	**
5.1.7.	The City will endeavour to promote the sustainability of transgenerational communities within associated heritage precincts.	+

5.2. PROMOTE PARTNERSHIPS

5.2.1.	The City will promote partnerships at all levels between actors within and outside of the heritage sector, including those with both shared and competing interests in heritage protection.	+
5.2.2.	The City will investigate, and where appropriate, enter into agreements with outside bodies including international and local organizations, educational institutions and heritage bodies regarding heritage management.	+
5.2.3.	The State is custodian of many of South Africa's most important historical sites within the city's boundaries. The City will, where requested, advise and assist the State as far as possible in ensuring that these publicly owned heritage resources are effectively managed.	+

5.3. INTERPRETATION, COMMUNICATION AND EDUCATION

5.3.1.	The City will ensure that heritage interpretation (via physical or digital interpretive signage) is provided across the city in an equitable, consultative and representative manner.	
5.3.2.	The City will promote and encourage the placement of heritage markers on sites on the Heritage Register.	**
5.3.3.	The City will ensure that interpretation of heritage resources is unbiased, fair and multi-layered, and encourages debate around contested heritage resources.	+
5.3.4.	The City will form partnerships to facilitate interpretation, communication and education.	+
5.3.5.	The City will develop resources to promote heritage interpretation and education i.e. projects, activities, pamphlets, exhibitions, websites etc.	+
5.3.6.	The City will promote the use of heritage resources and practices to enhance the variety of learning experiences and provide opportunities for cross-cultural understanding and discussion including identity and intangible heritage.	+

5.3.7.	The City will promote heritage as a platform for intergenerational knowledge exchange and capacity-building for specialized skills, traditions, and lifelong learning.	+
5.3.8.	The City will encourage access to, and the enjoyment of, heritage resources through projects that showcase the value of heritage to the public.	+

5.4. INVESTIGATION OF INCENTIVES

5.4.1.	The City may implement the land use incentive provided in the HPOZ where appropriate.	+
5.4.2.	The City may develop proforma designs to encourage heritage best practice for restoration and adaptive reuse in 'targeted support areas'.	+
5.4.3.	The City will investigate the development of incentives for the enhancement, repair, restoration and proper management of heritage resources, especially where incentives would help rejuvenate areas of urban decay.	*
5.4.4.	Any existing or new City development incentives must take into consideration implications for heritage resources management.	+