

Greyton Heritage Inventory Survey



WARD 2 FORUM
SERVING THE COMMUNITY TOGETHER

Prepared by Ward 2 Forum Team
22 August 2016

Greyton Heritage Inventory Survey and Report

Submission for extension of deadline to 60 days from 17 August 2016

INTRODUCTION

Ward 2 Forum fully supports the stated intent of the municipality and HOZAC to work for the implementation of a suitable and successful zoning scheme, with protective Overlays to control development in Greyton, including Heritage Protection Overlays.

MOTIVATION

Extension of the public participation process deadline is requested on the following grounds:

- 1) The original Notice was placed in the Theewaterskloof Gazette on Tuesday 9 August, which was a Public holiday so municipal offices and the library were closed. There is no record of any deliveries in Greyton;
- 2) The original Notice contained a faulty link to the consultants' website that was not fixed until 17 August. No link to the TWKM website was available;
- 3) TWKM, the HOZAC committee and Greyton Conservation Society have failed to distribute any reports or other information since the meeting on 1 August;
- 4) The Zoning Scheme and existing Guidelines are not yet in the public domain;
- 5) There has been no attempt to respond to a series of queries and questions sent to HOZAC (which includes Mr J Pienaar, TWKM Planning Manager) on 15 August 2016. We are told that these will be issued after 9 August;
- 6) The public consultation process should include discussion and debate, not just on the Heritage Survey itself, but **also on all aspects arising from the Survey**, and leading to the **finalisation** of the Greyton Overlay Zone/Architectural Policy (Mr Gxoyiya's letter of 24 May 2016 to Ward2Forum refers).
- 7) We consider that this project is critically important to the future of Greyton, which will contribute to the success of TWKM. Therefore, it is essential that sufficient time is made available for all the necessary consultation to be completed properly. This must be supported by TWKM Planning and HOZAC communicating information to the community and responding fully to queries etc.

Notwithstanding the excellent series of 4 (four) Information Notices issued by Greyton Information Bureau during 26-31 July 2016, it is a serious concern that the public are not being fully informed about the heritage protection process in Greyton. It is contended that **all** property owners, tenants and all associated businesses, should have been included on a list of Interested and Potentially Affected Parties, and should receive all the relevant information concerning this process, and **should continue to be consulted until the whole process reaches completion.**

The HWC Draft Guidelines (June 2016) on Public Consultation require that, in terms of section 4(3) of PAJA:

- 1) Appropriate steps are taken to communicate the administrative action to those likely to be materially and adversely affected by it and call for comments from them;
- 2) Any comments received are **considered** prior to taking the administrative action.

The importance of this process must not be underestimated:

- 1) Property rights and sale values may be affected, not necessarily favourably;
- 2) Protective Overlay Zones, properly implemented, are intended to prevent further inappropriate development in Greyton;
- 3) The Heritage Inventory is a mandatory requirement of the National Heritage Resources Act, but on its own serves as no protection at all;
- 4) The implications of this project are complicated therefore sufficient consulting time to discuss and debate the issues is necessary;
- 5) All available methods of communication information to the community, including timely responses to queries, should be used – Email, website links, Sentinel, Facebook, mail drop, TWKM info service, Greyton Info Bureau, TWKM Invoices and municipal office display of maps, Reports etc.

The procedure going forward should involve (not necessarily in the order shown):

- 1) Procedure and criteria used to judge the grading should be published, to help owners understand the data sheets and proposed grading (Act: section 30(4) – see Reference below);
- 2) Verification and correction of heritage data sheets (the inventory) by property owners;
- 3) Consultation (no details available) with owners on implications of their grading, particularly how their property will be protected (section 30(7));
- 4) Submission of inventory of at least 337 heritage resources to HWC for approval;
- 5) All properties graded 2 and 3 to be Gazetted, and owners informed of such;
- 6) Within 6 months, provisions for the protection of the properties must be agreed between TWKM, Province and HWC (section 30(11)) and implemented through Heritage Protection Overlay Zones;
- 7) The above Overlays, and associated architectural and aesthetic Guidelines must be compiled and amended through a public participation process. This is an operation requiring much dedication and many workshop sessions with the right people. TWKM in 2014 discarded the results of about 3 years work by an experienced team in Greyton;
- 8) Subject to assessment of TWKM's administrative capacity, expertise and experience in heritage grade 3 resources, and budget, the management of the heritage resources may be delegated to HWC (section 8(6));
- 9) Special consent will be required for **any alteration** to or development affecting a place listed in the register (section 30(11)(a)).

In addition to individual properties being graded and suitably protected, Heritage Areas can be identified and designated, all owners in these areas and in the community to be consulted, and the list to be Gazetted (section 31). TWKM must establish suitable protective measures through its zoning scheme.

Special consent is also required for **any alteration** to or development affecting a place listed in a Heritage Area (section 31(7)).

The local registered organisation, Greyton Conservation Society, has significant responsibilities and duties in relation to the local management of heritage resources (sections 27(8) and 30(11)(a)). These have yet to be defined in detail.

The **Heritage Overlay Zone Advisory Committee (HOZAC)**, which is an Advisory committee to TWKM, set up under the auspices of Greyton Conservation Society and chaired by Mr J Pienaar (TWKM Planning Manager), has not published any **Objectives** or **Principles** of operation. With only 4 (four) members **remaining** having forcibly removed one local **resident** with about 10 years of **relevant** experience with zoning schemes, should be encouraged to increase the committee size and inclusivity, and take the responsibility to publish relevant information for and to the community.

The **Greyton Aesthetics Advisory Committee (GAAC)**, also an advisory committee for TWKM, also without a Constitution or a set of objectives, should take the responsibility to publish their views on the reasons for the number of houses with inappropriate architectural and aesthetic designs or materials. Further, GAAC's proposals for any development application, and TWKM's response to them, should be publicised regularly.

Local Area Overlay Zones will be required to control development of ungraded properties outside the heritage areas, using similar provisions for land use and development as will be applied to the heritage resources. These may not be so stringent and prescriptive.

Note: Reference is made to various sections of the National Heritage Resources Act (No. 25 of 1999)



Ward 2 Forum Team