

Ref: 9/2/258/59

Enq: Dr JJ Bruwer

Date: 6 October 2000

Environmental Outsorce cc
PO Box 1566
FLORIDA
1710

Attention: Ms Ingrid Rosenberger

By fax: 472-6693

Dear Ms Rosenberger

**RE: COMMENTS IN RESPECT OF ENVIRONMENTAL SCOPING
REPORT - FORT WEST TOWNSHIP (REPORT NO. WFT/01 DATED 8
SEPTEMBER 2000)**

1. We appreciate your invitation of 18 September 2000 to comment on the above-mentioned report and trust that our comments and the views expressed in this letter will be of use to you. We confirm from your invitation that our comments will be submitted together with the above-mentioned report by yourselves to the Department of Agriculture, Conservation and the Environment of the Gauteng Provincial Government.
2. We consequently have the pleasure to make the following comments:
 - 2.1 The report shows that the West Fort Community Development Consortium is fully aware of the fact that the property known as Portions 1,2 and 3 of the farm Fort 464, Registration Division JR (previously known as the farm Broekscheur 318 JR) was previously designated to be declared as a conservation area.
 - 2.2 Under the National Heritage Resources Act, 1999 (Act 25 of 1999), all structures or parts of such structures that are older than 60 years on the above-mentioned property, are additionally protected, and may under no circumstances be altered or demolished without a permit from the SA



Heritage Resources Agency (SAHRA): In terms of Section 2 of the above-mentioned Act, "structure" means "any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith".

- 2.3 The West Fort Community Development Consortium should be complimented on their initiative pertaining to the proposed Fort West Township development. This development, if sensitively treated, carries within its very being, the promise of a sustainable future for that which we have already designated as being an integral part of the national estate.
- 2.4 We have for a considerable time been concerned about the deterioration of the property and the above-mentioned Scoping Report appears to show that it is the business of the West Fort Community Development Consortium to establish a successful marriage between conservation and development and to arrest the further deterioration of the property.
- 2.5 Based on our *support in principle* for the proposed development, we have the following specific recommendations to make and trust that these would be favourably considered:

2.5.1 **Development of a conservation management plan**

The need to develop a comprehensive conservation management plan for the property known as Portions 1,2 and 3 of the farm Fort 464, Registration Division JR, should be addressed without delay! Such a plan would be based on a detailed assessment of the cultural significance and other special values of the property. It is suggested that the so-called *Burra Charter* (i.e. *The Australian ICOMOS Charter for Places of Cultural Significance*) should be taken as the point of departure in the development of the plan.

The urgent need to develop such a conservation management plan stems from the fact that any further conceptualisation/planning with respect to the development would have to be informed by the findings and recommendations of such a plan.

2.5.2 **Contextual conservation and the proposed interpretation of the cultural and other significance of the property**

It is of equal importance that the layering of the history and the heritage significance in general of the property, should be holistically dealt with in terms of the proposed development and that the latter should be effected so as not to impact on the contextual significance of any part or parts of the property. The proposed idea - (refer *Fort West Urban Village Proposed Heritage And Tourism Projects - 01.49* "All Heritage Buildings shall be marked with informative plaques along a pedestrian path around the Village Centre, with leaflets and brochures to further



inform visitors about the Village") is thus strongly supported.

2.5.3 **Section 38(3) of the National Heritage Resources Act, 1999**

We would only be able to finally assess how the proposed development would relate to heritage resources situated on the above-mentioned property on the submission to us of detailed information as specified in Section 38(3) of the National Heritage Resources Act of 1999. Meeting our requirement in terms of the development and submission to the SAHRA of a conservation management plan should therefore be seen as a *sine quo non* to any detailed planning and our approval of same.

It will be found that the findings and recommendations of a meaningful conservation management plan would automatically address issues such as the views of communities (Section 38[3][e]), proposed interventions e.g. adaptive re-use of buildings (Section 38[3][f]) etc.

3. We consequently suggest that a specialist/s should be appointed to develop a comprehensive conservation management plan as per our comments in the above connection as part of a fully-fledged environmental impact assessment and that such a specialist/s should be fully conversant with Section 38(3) of the National Heritage Resources Act, 1999.

Yours sincerely

**REGIONAL MANAGER
GAUTENG / MPUMALANGA / NORTHERN PROVINCE**

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