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2001/077745/23

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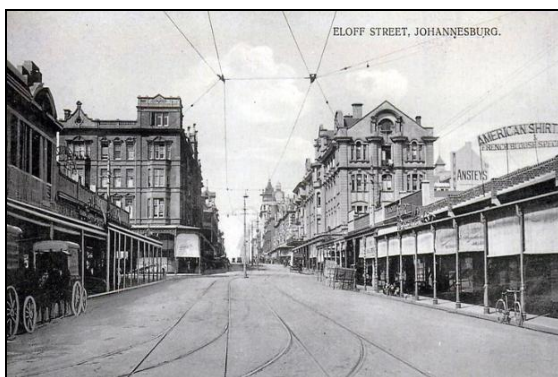
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HERITAGE IMPACT ASSESSMENT OF PROPOSED UPGRADING OF ELOFF STREET AND PAVEMENT AREAS JOHANNESBURG GAUTENG PROVINCE

Date: January 2018

Report compiled by: M. Naude

EXECUTIVE SUMMARY

General

The proposed development focuses on the upgrading of the Eloff Street precinct in Johannesburg. The street will be resurfaced and the pavement will be upgraded with the introduction of new paving and street furniture. The entire route between Plein Street in the north and Andersen Street in the south will be upgraded. It is mostly an engineering project and not a landscaping project with the objective to enhance the movement of pedestrians along the route and create a uniform character in the precinct.

Findings

The proposed development will only focus on the street and pavement surfaces while no existing buildings along the edges of the study area will be impacted on directly. Even though Eloff Street has retained its original form and function as principal arterial route for vehicles, the streetscape has been altered since it was established. Both the street character and interface area between the entrances to the buildings along the street have changed over time.

In the past the individual building played a significant role in defining the character of the street and protected pedestrians as they passed underneath canopies and verandas that were part of the architecture and design of the individual buildings. Balcony and canopy posts framed the street. As the buildings were demolished and were replaced by more contemporary style structures the pavement became more prominent as an urban entity on its own and as an open rather than covered walkway. In the current scenario the architecture can only be enjoyed from a distance and the street level of each individual building has lost its exceptional contribution to the pavement. Only the entrances of a few buildings celebrate the streetscape.

Recommendations

The development may commence with certain conditions

Street

- The street name be retained.
- The street alignment be retained but the edges be altered in the same way as the sections between Albertina Sisulu street and Pritchard street
- The existing paved areas crossing Eloff street be retained and upgraded
- Similar paving be introduced on the corners of Pritchard street and Eloff street
- All pedestrian crossing be done in face bricks

Pavements

- All existing trees be retained

- All areas around the stems be expanded to 2m by 2m and the soil covered with stone to allow water penetration into the ground
- The design and material specifications of the pedestrian surfaces be determined in collaboration with a registered landscape architect.
- All pedestrian surfaces be upgraded and bus stops, refuse bins and seating be designed and placed in such a manner that they could be easily maintained and cleaned.
- The sculpture on the corner of Eloff and Commissioner Street be relocated to a less risky location.

Buildings

- The entrances of the four buildings indicated on the street diagram be celebrated with special treatment regarding the design of the paving directly in front of these entrances and the views towards these entrances not be obscured by the planting of trees or the introduction of seats, bus stop shelters or vendor related structures of any kind.

Mitigation

- The entire streetscape be documented by photographic recording of each street block and be compiled into a report serving as an annexure to the application submission for permits from the PHRA-Gauteng.

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GLOSSARY OF TERMS

Study Area – refers to the entire area to be developed as indicated on the scale drawings by the client.

Stone Age – The first and oldest part of human history is the Stone Age that is associated with the appearance of early humans between 3-2 million years ago. Stone Age people were hunters, gatherers and scavengers who did not settle in permanent settlements. Places associated with these humans are determined by identifying stone tools that have been preserved in the landscape.

Early Stone Age: 2 000 000- 150 000 before Present (BP)

Middle Stone Age: 150 000 – 30 000 BP

Later Stone Age: 30 000 – until c. AD 200

Iron Age – A period covering the last 1800 years, when an altered lifestyle was introduced to southern Africa. They established villages, cultivated domesticated crop types such as sorghum, millet and beans and they herded cattle, sheep and goats. They spoke early variations of the Bantu language and manufactured iron objects.

Early Iron Age: AD 200 - AD 1 000

Late Iron Age: AD 1 000 – AD 1830

Historical period – Since the arrival of white settlers – c AD 1652 (Southern parts of South Africa and AD 1840 (north of the Vaal River)

Cultural significance - According to the ICOMOS Burra Charter cultural significance means 'aesthetic, historic, scientific or social value for past, present or future generations.

Aesthetic value – Criteria considered for this category may include the form, scale, colour, texture and material of the fabric, the smells and sounds associated with the place and its use.

Historic value – Historic value encompasses the history of aesthetics, science and society and therefore to a large extent underlies all of the terms used for evaluation. A place may have historic value because it has influenced or has been influenced by an historic figure, event, phase or activity. The significance will be greater where evidence of the association or event survives in situ or where the settings are substantially in tact than where it has been changed or evidence does not survive.

Scientific value – The scientific or research value of a place will depend on the importance of the data involved, on its rarity, quality or representativeness and on the degree to which the place may contribute further substantial information.

Social value – Social value embraces the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment to a majority or minority group.

Abbreviations

EIA – Environmental Impact Assessment

EIA – Early Iron Age

ESA – Early Stone Age

LIA – Late Iron Age

LSA – Late Stone Age

MSA – Middle Stone Age

NASA – National Archives of South Africa

NHRA – National Heritage Resources Act

PHRA – Provincial Heritage Resources Agency

SAHRA – South African Heritage Resources Agency

1. BRIEF

Do a heritage impact assessment on heritage resources for the proposed Eloff Street (Johannesburg) upgrading development.

2. AIM OF THE STUDY

*To identify aspects and elements of the historic street and streetscape of Eloff Street, Johannesburg city centre that may be of exceptional heritage significance.

*To evaluate any aspects or elements of the street according to the criteria set out in the National Heritage Resources Act (NHRA)

*Make recommendations regarding the proposed design.

3. ASSUMPTIONS AND CONDITIONS

The heritage investigation only included manmade elements on the surface of the study area. Any human remains or cultural material that is subterranean will only be exposed when excavations are done. If any of these elements be exposed during construction the construction work must stop and these exposed materials be investigated by an archaeologist.

This is primarily an engineering project and not a landscaping project. No survey or investigation report was available on the condition and status of the planted vegetation in the precinct. No landscaping design proposal was submitted as part of the design proposal.

4. GEOGRAPHIC AREA OF THE STUDY

The study area covers the precinct of Eloff Street in Johannesburg city centre. The geographic area is determined by the brief to the engineers responsible for the proposed development and consist of two zones namely (a) the street and (b) the pavement. For the purposes of this study this area will be referred to as a 'precinct'. This precinct starts at Plein Street in the north and extends to Andersen Street in the south.

The proposed development will also be executed in two phases, according to this division: (a) resurfacing of the road and (b) upgrading of the pavement.

The east west boundaries of the precinct are defined where the adjacent buildings and pavement meet. None of the buildings will be demolished or upgraded and are excluded from the proposed development.

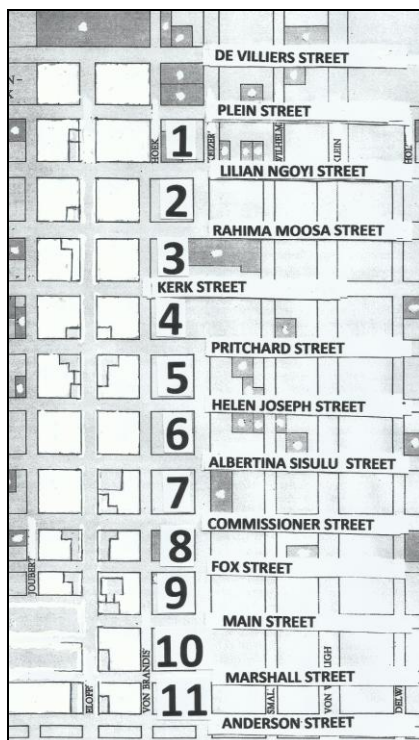


Figure 2. Numbering of street blocks used for the investigation – the study area is defined by the strip along Eloff Street, left of the numbering

6. FINDINGS

6.1. Section 38(3) (a) Identification and mapping of all heritage resources impacted on in the area affected.

Street

The street alignment is the same as when the city was established and has only changed in character due to upgrading and modernization. It is currently covered with asphalt or tar with some areas paved defining specific areas where pedestrian zones from east to west cross Eloff Street. The original levels of the street (dirt road phase) have not been determined as no excavations were done. Some of the original and more recent curbing have been removed for ease of movement on pedestrian levels.



Pavements

In the past the pavements were protected by covered walkways but only three sections of this type of canopy from this period have remained. The current pavements are open and unprotected with the entire precinct being paved with a variety of pavers, often in no uniform way combining face bricks, cement bricks, concrete blocks and interlocking pavers of many kinds.



A variety of rubbish bins occur in the study area without a significant pattern in terms of location, landscape design, style, size or predetermined strategy regarding mountings and management. This resulted in almost random prefabricated units throughout the precinct reflecting no rationale but also not serving their purpose of keeping the area clean.



Bus stops and pedestrian shelters were erected at various points along the route. These also vary in size, style and aesthetic character. None of them have been thoroughly maintained and some have been completely removed while others are useless due to the partial or total removal of seats.



One of the most historic objects in the precinct is the old post box under the balcony of the building on the northeastern corner of Marshall Street and Eloff Street. Similar looking red post boxes occur on the pavements of neighboring streets, but only a single example is located in Eloff Street.



An exceptional occurrence is the presence of a wooden sculpture on the northeastern corner of Eloff Street and Commissioner Street. Although it celebrates creativity and variety on the pavement in the precinct it is located at an awkward position almost on the edge of the pavement where it is not protected and can be easily bumped over.

Several tree boxes have been added to the streetscape with the introduction of new trees. These trees have now outgrown their brick constructed containers. In some cases the concept remained successful while in many cases these containers have become empty and serve no purpose anymore.



Figure 3. Small sculpture on the corner of Eloff and Commissioner Streets, placed at an awkward position



Figure 4. Simple tree box that has become too small

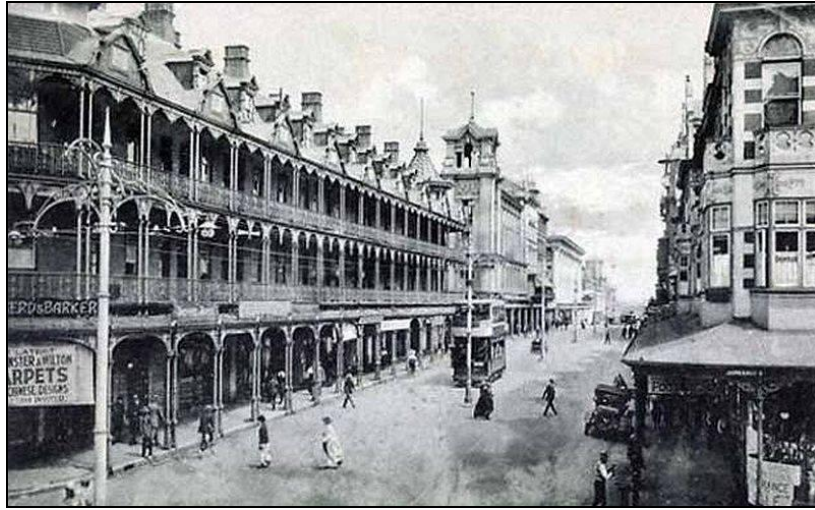


Figure 5. Tree box with tapered sides and neatly cut face bricks

Buildings

Even though Eloff street contains many fine old buildings of significant architectural value their facades can only be enjoyed from a distance and their presence on street level have been degraded

with the loss of the covered walkways, balconies and canopies that used to extend right up to the street. These architectural elements formed well defined colonnades of columns and iron posts of different kinds, design and styles.



Only three buildings have retained some of their architectural fabric such as balconies and covered walkways.

In isolated cases what remained of the historic architectural fabric on pavement and pedestrian level are the grand entrances of some of the buildings. Due to the loss of the former unique architectural legacy on pedestrian level these entrances are the only elements left and need to be celebrated.



Figure 6. Entrance of Castle Mansions – with a fine Art Deco entrance



Figure 7. Facade and principal entrance of the His Majesty's Building



Figure 8. Street level entrance of the His Majesty's building.

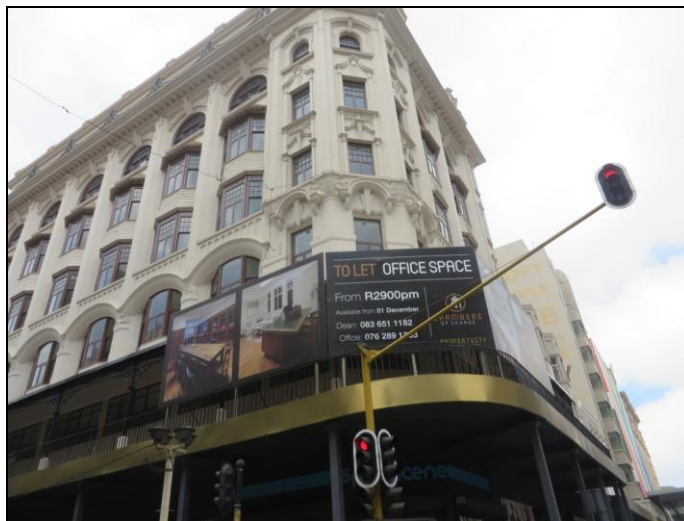


Figure 9. Balcony of the Cuthberts Building - adjacent to the Penlan Building



Figure 10. Covered walkway of the historic Penlan Building



Figure 11. Covered walkway with concrete columns rising from the street curbing

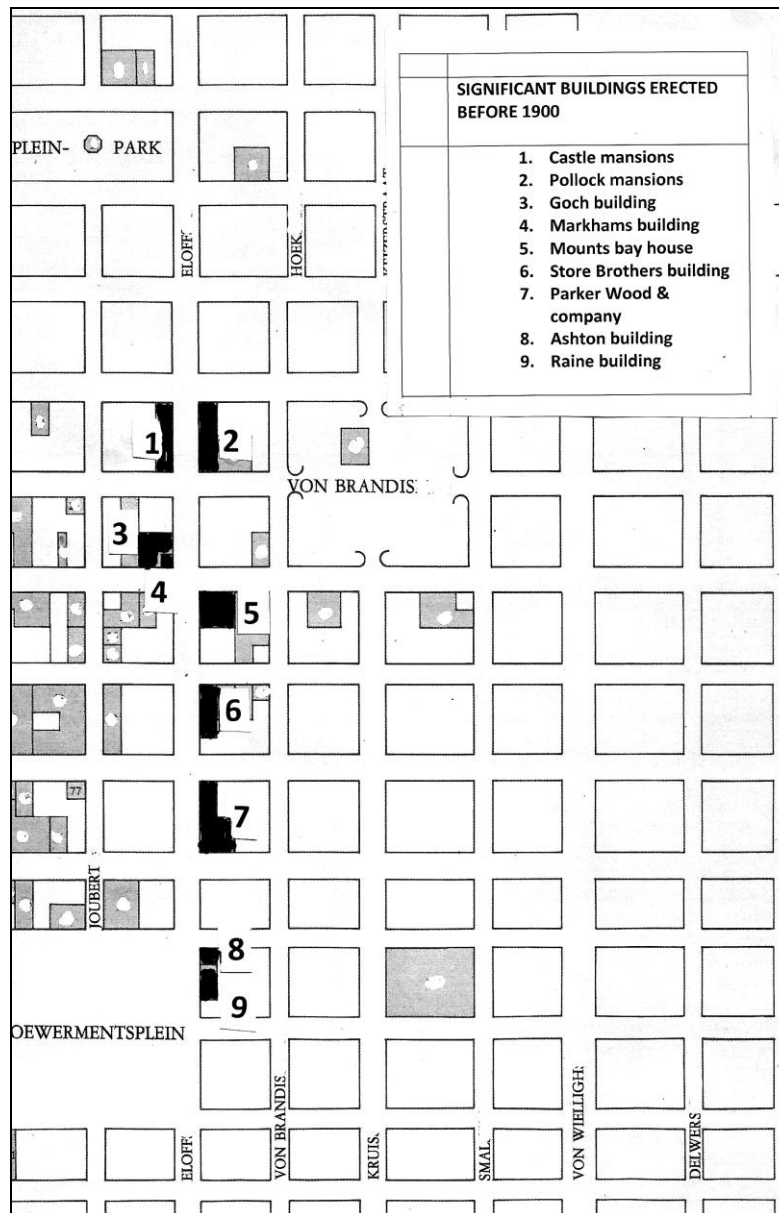


Figure 12. Significant buildings erected before 1900

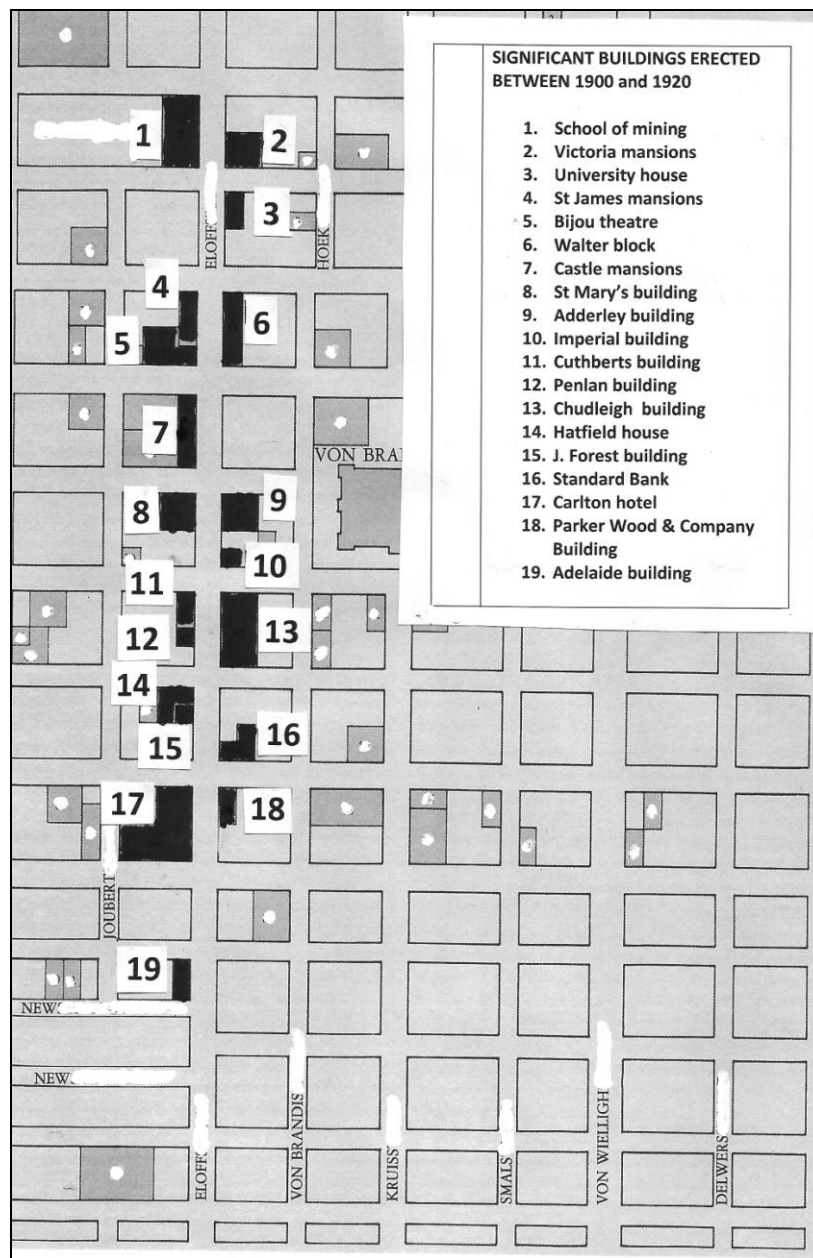


Figure 13. Location of buildings erected between 1900 and 1920

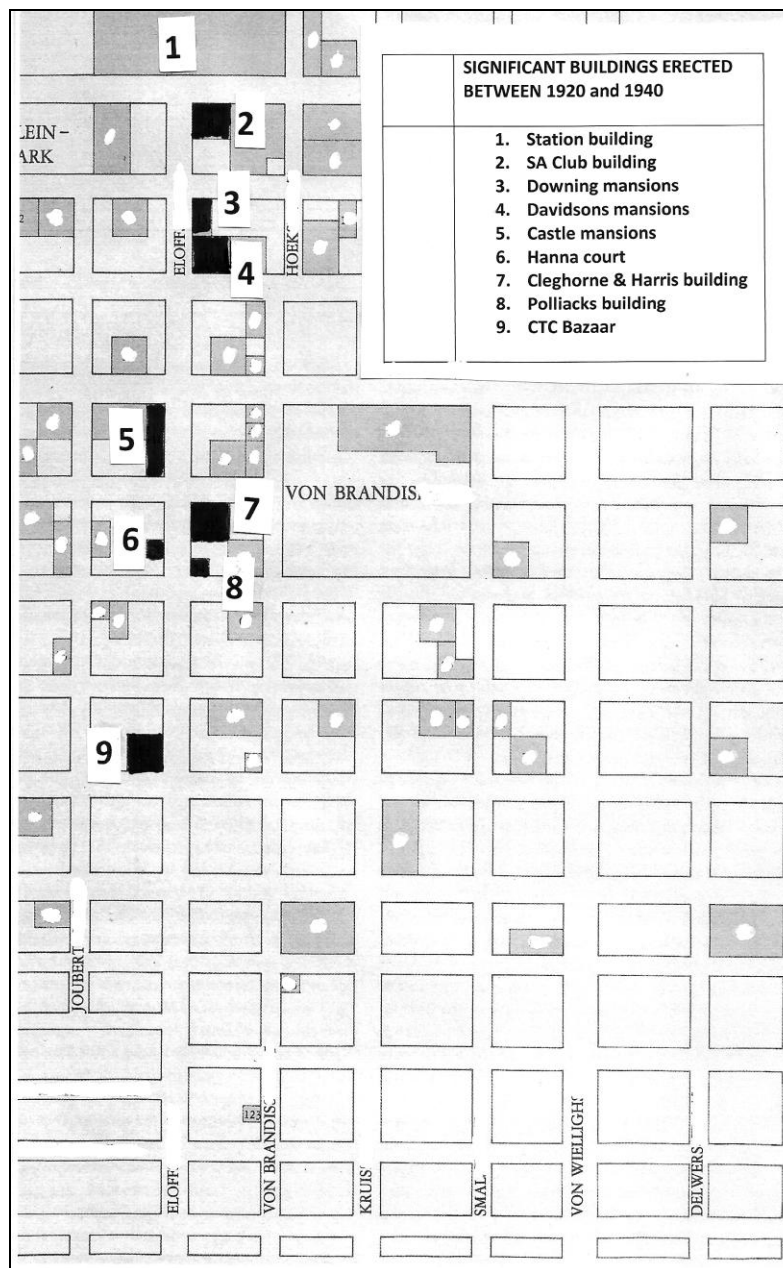


Figure 14. Location of buildings erected in the period 1920 to 1940

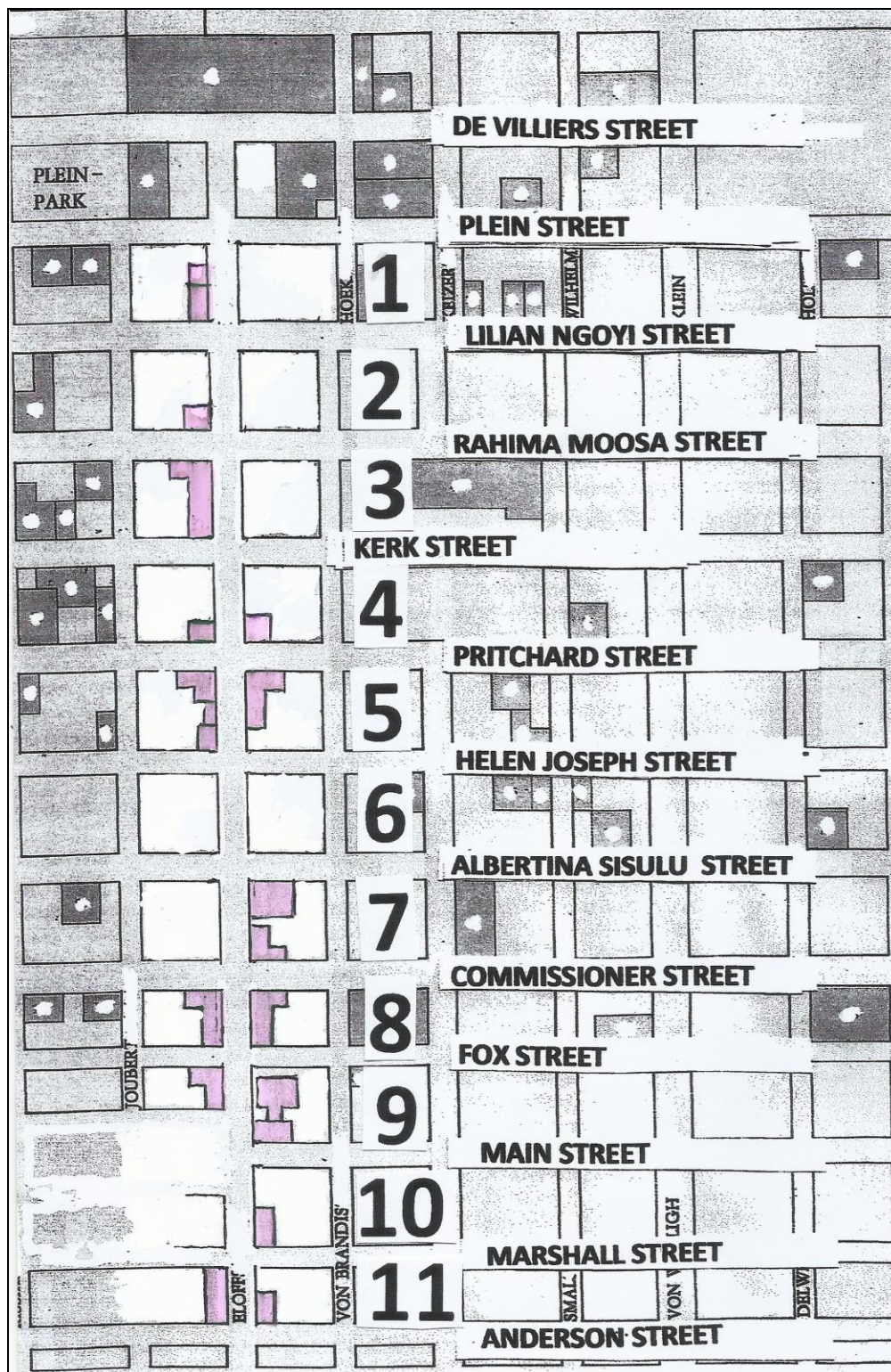


Figure 15. Buildings of heritage significance along Eloff Street according to the 2018 survey

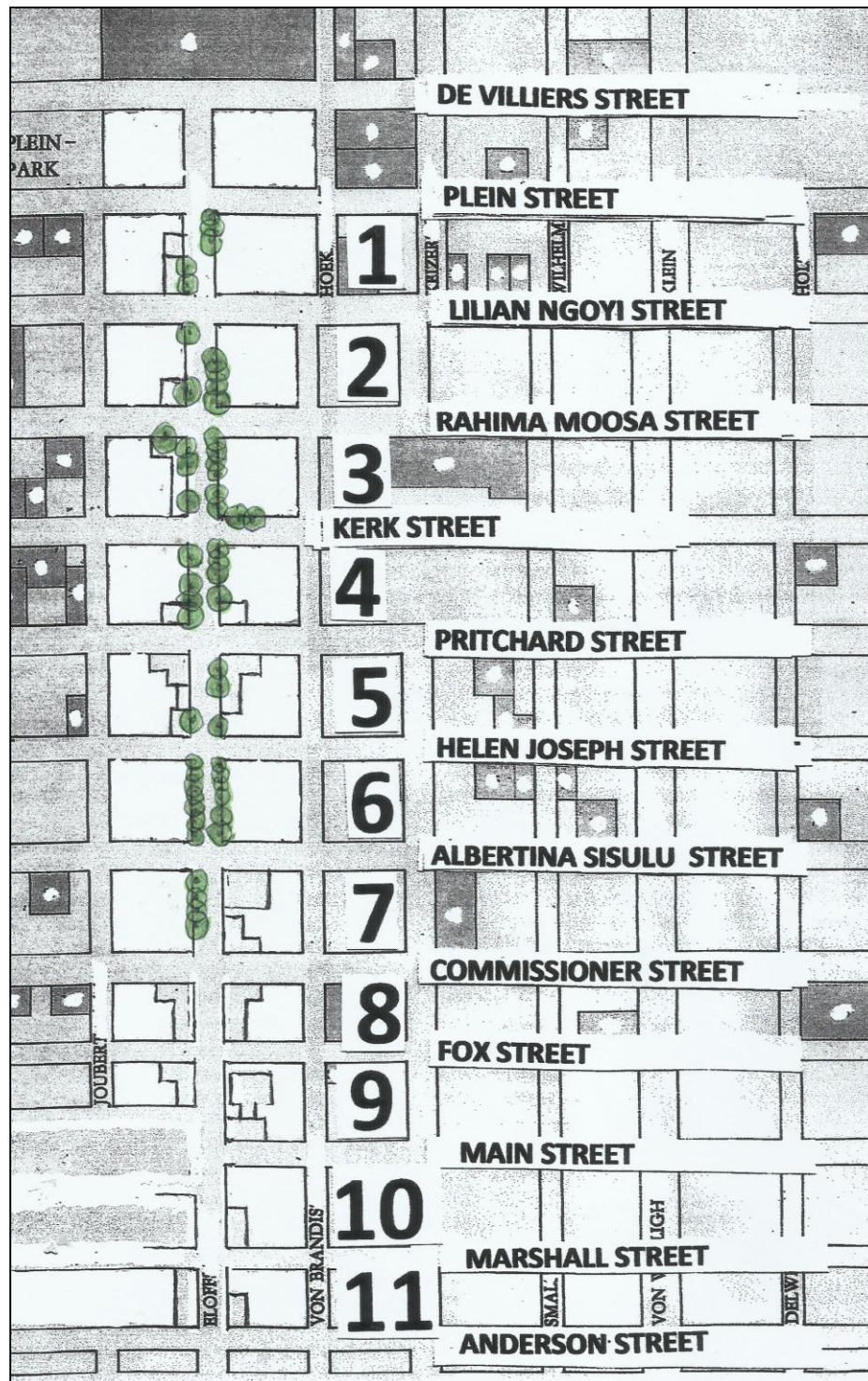


Figure 16. Planted trees along Street Blocks 1 to 7

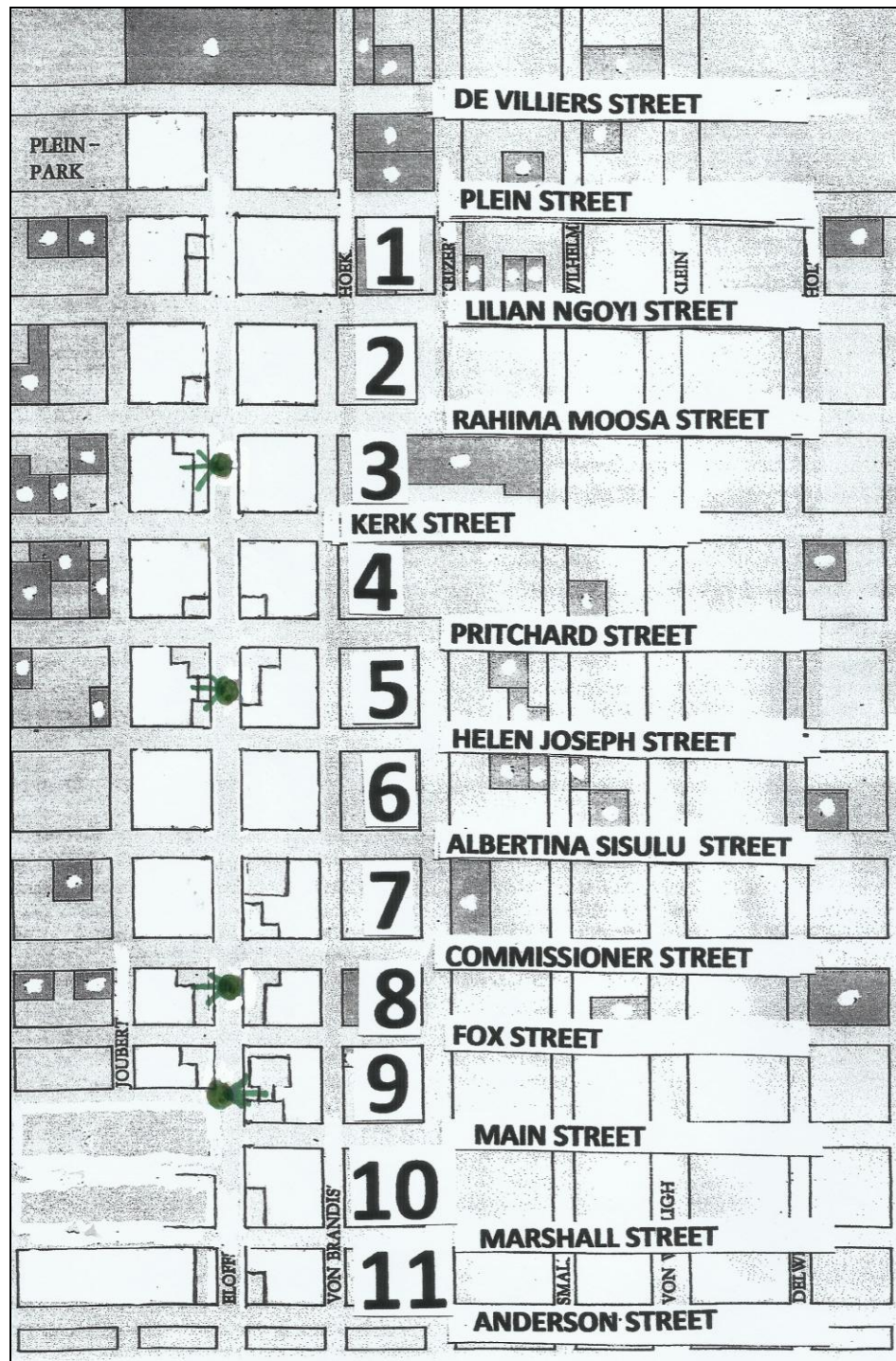


Figure 17. Location of significant entrances of historic buildings

6.2. Section 38(3) (b) An assessment of the significance of such resources in terms of the heritage assessment criteria in Section 6(2) or prescribed in Section 7.

According to the Burra Charter ‘cultural significance’ means ‘aesthetic, historic, scientific or social value for past, present or future generations’. Cultural significance is a concept which helps in estimating the value of places. These terms and their meaning are not mutually exclusive, for example, architectural style has both historical and aesthetic aspects (Burra Charter, 1999).


The categorization into aesthetic, historic, scientific and social values is one approach to understand the concept of cultural significance (Burra Charter, 1999). However, more precise categories may be used as understanding of a particular place may increase.

For the purposes of this report such categories are used in tandem with the criteria set out by the National Heritage Resources Act.

6.2.1. Significance criteria in terms of Section 3(3) of the National Heritage Resources Act.

Criteria

1.	<p>The importance of the cultural heritage in the community or pattern of South Africa’s history (Historic and political significance)</p> <p>In the Eloff street precinct ‘‘cultural heritage’’ refers to the street and streetscape as the principal manmade elements to be reviewed.</p> <p>The Eloff street precinct does not represent a South African landscape but is unique to Johannesburg and makes a contribution to the history of the city and reflects urban change along this spine over time.</p>	<p>Rating</p> <p>high</p>
2.	<p>Possession of uncommon, rare or endangered aspects of South Africa’s natural or cultural heritage (Scientific significance).</p> <p>The precinct has its own character as defined by the street character and the interface open areas between the street and the buildings defining the boundaries of the area. However the precinct is not a rare phenomenon.</p>	<p>Rating</p> <p>low</p>
3.	<p>Potential to yield information that will contribute to an understanding of South Africa’s natural or cultural heritage (Research/scientific significance)</p> <p>Eloff street is one of the oldest streets of Johannesburg and shares its history with numerous other streets that formed part of the first formal layout of the town of Johannesburg. It forms part of the original grid layout and has retained this aspect for its entire history. In isolation it will not contribute to an understanding of South Africa’s cultural heritage. Eloff street contributes to the history of the urban fabric of Johannesburg due to its uniqueness and its contribution to the uniqueness of the city.</p>	<p>Rating</p> <p>medium</p>

4.	<p>Importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects (Scientific significance)</p> <p>The Eloff street precinct must be categorized as a particular phenomenon and class of urban landscape. For the purposes of this report this entity is a 'streetscape'. It remains primarily a street with pavements along the entire length of the street. It is not a square or a boulevard, neither is it a fully pedestrian spine as it also serves as arterial route for taxis, cars and buses. It remains an artery for vehicles with ample space along its sides to accommodate pedestrian movement along a south-north axis. The</p> <p>Eloff Street precinct does represent a particular class of cultural places within the Johannesburg city centre context.</p> <p>The Eloff street streetscape is well-defined by hard architectural edges on both sides. It differs from other streetscapes such as those that are only defined by buildings along one side such the streetscapes found in coastal towns where buildings in the principal street face towards the sea (see Simons Town Streetscape below).</p>  <p>Figure 18. Example of a streetscape in Simons Town, with a series of buildings along a single edge making the appreciation of the facades easier</p>	<p>Rating</p> <p>high</p>
5.	<p>Importance in exhibiting particular aesthetic characteristics valued by a community or cultural group (Aesthetic significance)</p> <p>The aesthetic character of Eloff street has been altered drastically since it was established. It started as a dirt road and continued along its own evolution of changes. A significant phase of the street's history was when it had two tram rails running through the middle of the street with power cables and steel posts supplying electricity from the centre of the street.</p> <p>Eloff street used to have an asphalt surface but during the 1970s</p>	<p>Rating</p> <p>medium</p>

while some of the crossings were upgraded with square paving blocks. This enhanced the character of the streetscape and served the street with a more pedestrian character.

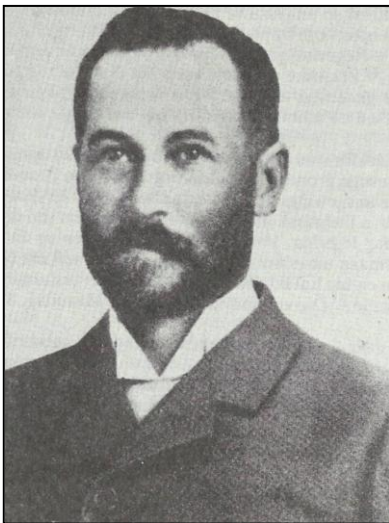


Figure 19. Eloff street when it was still a dirt road – note the balconies and canopies of the buildings



Figure 20. Eloff street in the 1950s before the trams were removed from the street – balconies and canopies are still dominating the edge and interface with the street.

6.	<p>Importance in demonstrating a high degree of creative or technical achievement at a particular period (Scientific significance)</p> <p>Neither the <u>street</u> nor the <u>pavement</u> areas reflect a high degree of creative or technical achievement of a particular period. The</p>	<p>Rating</p> <p>low</p>
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	<p>sections between Plein street and Commissioner street reflect some sympathy towards creating a space for pedestrians that is less uniform.</p> <p>The remaining sections of the pavement only serve as sterile walkways.</p>	
7.	<p>Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons (Social significance)</p> <p>The precinct forms part of the city centre of Johannesburg, the grid street pattern and open spaces of the city. Residents of Johannesburg and heritage societies who have a keen interest in the heritage of the city centre and environs consider Eloff Street as part of the history of the city and the integration of the street with its architectural heritage as part of the complex history of Johannesburg.</p> <p>Since 1994 the street has changed its social character and gained a more African character. Hundreds of individuals use the street as outlet for goods of a great variety. This is enhanced by the many fast food outlets located in the buildings lining the precinct. To these individuals Eloff street has become part of their life and would prefer that it remains like this.</p>	<p>Rating</p> <p>high</p>
8.	<p>Strong or special association with the life and work of a person, group or organization of importance in the history of South Africa (Historic significance)</p> <p>Eloff street was named after J.J. Eloff, the first mine commissioner of Johannesburg. He was not the designer or the creator or builder of the street, but his name was used to commemorate Eloff.</p>  <p>Jan Eloff [19/07/1859-10/07/1939], (Appelgryn 1984)</p>	<p>Rating</p> <p>high</p>

	<p>He was born in Rustenburg and served in the First Anglo Boer War (1880-1881) He later became a clerk in the office of the State Attorney in Pretoria. He accompanied Pres J.P. Kruger on his third deputation to Europe as Krugers private secretary. In 1884 he was appointed as the first civil commissioner of the Republic (ZAR) in Pretoria. He then became public prosecutor and clerk to Captain Carl von Brandis in Johannesburg and in 1886 succeeded von Brandis as mining commissioner of the gold-fields. In 1886 he also became chairman of the Diggers Committee.</p> <p>On 2 November 1889 he laid the cornerstone of the second building to house the Johannesburg Stock Exchange. He remained mining commissioner until December 1892 and during this time became intimately involved in the establishment of Johannesburg and the development of the gold-fields.</p> <p>When Johannesburg was surveyed and laid out by surveyor Josias de Villiers, the first street was named after Eloff.</p> <p>After years of activity in Johannesburg he left public life to farm on his farm in the Standerton district (Kruger et al,1977: 269-270).</p>	
9.	<p>The significance of the site relating to the history of slavery in South Africa.</p> <p>The Eloff street precinct does not relate to the history of slavery in South Africa.</p>	<p>Rating</p> <p>low</p>

6.2.2. Significance criteria in terms of historical, artefactual and spatial significance.

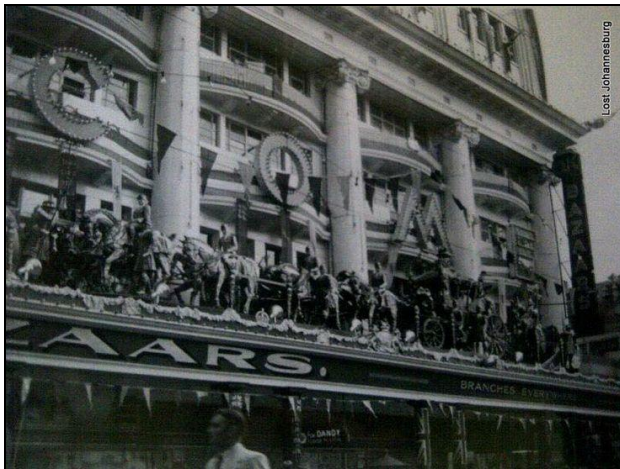
As the criteria set out in the National Heritage Resources Act tend to approach heritage from the level of 'national' significance and few heritage sites and features fall within this category, a second set of criteria are used to determine the regional and local significance of heritage sites. Three sub-categories are used to determine this significance:


- (a) Historical significance – this category determines the social context in which a heritage site and resource need to be assessed. These criteria focus on the history of the 'place' in terms of its significance in time and the role they played in a particular community (human context).
- (b) Architectural significance – The objective of this set of criteria is to assess the artefactual significance of the heritage resource, its physical condition and meaning as an 'object'.
- (c) Spatial significance – focuses on the physical context in which the object and place exists and how it contributed to the landscape, the region, the precinct and neighborhood.

Historical significance

As the criteria set out in the National Heritage Resources Act tend to approach heritage from the level of ‘national’ significance and few heritage sites and features fall within this category, a second set of criteria are used to determine the regional and local significance of heritage sites. Three sub-categories are used to determine this significance:

Criteria Significance

1.	<p>Is the street or streetscape associated with a historical person or group?</p> <p>Only the street name is associated with a particular person namely J.J. Eloff. The street belongs to the city and is managed by the Johannesburg local authority. For this reason the significance of the street relates to the history of the city and its people.</p>	<p>Rating</p> <p>high</p>
2.	<p>Is the street or streetscape associated with a historical event?</p> <p>One of the best recorded events was the visit of the Royal family in 1947. For this event some of the buildings were decorated such as the old OK Bazaars building. However the street was not the most significant place associated with this visit but only served its functional purpose from the station into the city.</p>  <p>Figure 21. The OK Bazaars was decorated for the Royal visit in 1947.</p>	<p>Rating</p> <p>low</p>
3.	<p>Is the street or streetscape associated with a religious, economic, social, political or educational activity?</p> <p>The 2018 streetscape of Eloff Street is mostly associated with informal trade. Numerous sections of the pavements in the study area is used for trading. This aspect of the street dominates the visual and functional character of the pavements. It also dominates</p>	<p>Rating</p>

	<p>the general visual ambience of Eloff street.</p>  <p>Figure 22. Informal trading along the pavement with redundant plant container.</p>	
4.	<p>Is the street or streetscape of archaeological significance?</p> <p>No Stone Age or Iron Age objects were found in the study area but may still be present subterranean.</p> <p>The street is older than 100 years and is classified as an area or a site of archaeological significance. Some of the buildings along this spine are also older than 100 years.</p>	<p>Rating</p> <p>Low</p> <p>High</p>
5.	<p>Are any of the buildings on the site older than 60 years?</p> <p>The entire Eloff street spine contains buildings older than 60 years and most of the buildings indicated on the map are older than 60 years. Only two are younger than 60 years.</p>	<p>Rating</p> <p>high</p>

Landscape Architectural significance (artefactual significance)

<i>Criteria</i>		<i>significance</i>
1.	<p>Is the street and streetscape an important example of a Johannesburg streetscape precinct?</p> <p>The 2017 streetscape of Eloff street reflects similar characteristics to other street in Johannesburg when criteria such as the street character and pavement character are used. The only exceptional difference is defined and determined by the variety of architectural styles of the buildings along the edges of the various street blocks of the street.</p> <p>For the purposes of this study the street and streetscape on pedestrian level are considered more important for evaluation than the architecture of the buildings rising above the streetscape.</p>	<p>Rating</p> <p>high</p>
2.	<p>Is the street or streetscape an outstanding example of a particular style or period?</p>	<p>Rating</p>

	<p>The Eloff street streetscape evolved through several phases in its urban history and even if these phases cannot be considered as styles they do reflect different periods.</p> <p>The current 2018 character of the streetscape contains elements from more than 100 years and the general character is that of variety and a historical layering of periods and buildings of different styles since 1900.</p> <p>The commercial character of the street is typical of the period after 2000 when informal traders became a common occurrence on city pavements.</p>	
3.	<p>Does the street or streetscape contain fine landscaping details and reflect exceptional craftsmanship?</p> <p>Short sections of the street have been paved with pavers that make a contribution to visual character of the street.</p> <p>The only area where formal landscaping makes a contribution to the precinct is the zone between Plein and Commissioner Streets. Other areas are those where east west crossings were pedestrianized and Eloff Street was deliberately connected to adjacent parallel street applying principles and design structure of landscape architecture.</p>	<p>Rating</p> <p>medium</p>
4.	<p>Is the street or streetscape an example of an exceptional industrial, engineering or technological development?</p> <p>The current character of Eloff Street does not reflect any engineering development but if compared to historical photographs one phenomenon stands out namely the period when the street had electric trams. Even though this is considered an old fashioned mode of transport in South Africa, it has retained its place in urban transport strategies in the northern hemisphere especially in Europe. This can be considered part of the engineering and transport history of Johannesburg but all evidence of this mode of transport in Eloff street from this period has disappeared.</p>	<p>Rating</p> <p>low</p>
5.	<p>What is the state of the architectural and structural integrity of the street and streetscape?</p> <p>‘Neither the street nor the pavement can be classified as “architecture”. The street is an engineering entity and hard to evaluate in terms of its architecture. It is also not possible for the heritage specialist to evaluate it in terms of its structural integrity. This falls within the domain of the structural engineers.</p> <p>The pavement area should rather be evaluated in terms of its landscape architectural characteristics. However, the Eloff street</p>	<p>Rating</p> <p>low</p>

	precinct contains areas where the pavements have been designed and redesigned qualifying them as areas reflecting a particular design language associated with the urban open space architecture. Along all the areas that have been redesigned in the past 30 years, the quality and inherent integrity of the designed features have decayed. Remnants of the designed features are still in situ but not intact and the architectural integrity has disintegrated.	
6.	<p>Is the street or streetscape's current and future use in sympathy with its original use (for which they were designed)?</p> <p>Since Eloff street was established it was used as a street and retained a street character as intended - used by vehicles. According to the proposed development plan, Eloff street will retain its original use as a vehicle artery.</p> <p>The pavement and interface zone between the buildings and the street is the area where most of the changes have happened over time. It still functions as pavement and pedestrian area and this use will be retained</p>	<p>Rating</p> <p>High</p> <p>medium</p>
7.	<p>Were the alterations to the street or streetscape done in sympathy with the original design?</p> <p>The streetscape of Eloff street was never designed to reflect a particular style. All the physical changes that happened were the result of private entrepreneurship and each landowner tried to create something special in order to reflect the companies brand and image rather than blending into a master plan set out and guided by the city council.</p> <p>Eloff street started off as a dirt road. However the alignment of the street has remained the same since it was established.</p>	<p>Rating</p> <p>high</p>

Spatial significance

Even though each building needs to be evaluated as single artifact the site still needs to be evaluated in terms of its significance in its geographic area, city, town, village, neighborhood or precinct. This set of criteria determines the spatial significance

Criteria

Significance

1.	<p>Can the street be considered a landmark in the city?</p> <p>Eloff street can be considered a landmark in the city due to its age and functionality. The street forms part of the original town layout and has survived since then. It contains many historical layers as the city changed over time and has become a significant economic artery reflecting more of an African character than ever in its</p>	<p>Rating</p> <p>high</p>
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	history.	
2.	<p>Does the street or any of the adjacent buildings contribute to the character of the neighborhood?</p> <p>The entire Eloff Street has become a precinct with its own character from north to the south. The precinct is bordered by commercial buildings that frame and envelop the precinct. It has become a neighborhood on its own that connects with surrounding street blocks where the east west streets crossing Eloff Street open up.</p>	<p>Rating</p> <p>high</p>
3.	<p>Do any of the buildings contribute to the character of the streetscape?</p> <p>The entire precinct is bordered by buildings. The general spatial arrangement pattern is that buildings were erected right up to the property boundary and buildings are accessed directly from the pavement. Facades of the buildings are set directly against each other forming a continuous envelope with fronts of glass intermittently organized with plastered and un-plastered brick walling. In this continuous architectural envelope the entrances of the various buildings are the only features that in some locations render the streetscape existing or breaking the monotony.</p> <p>Most of the buildings and building complexes were not set back allowing no "breathing space" or any opportunity for the pedestrian to enjoy the façade of any building. The enjoyment of the historic buildings is also negatively impacted on by trees planted along the pavements.</p> <p>The entrances of most of the buildings have been stylized to blend with the adjacent windows and entrances of commercial retail buildings. The architecture cannot really be enjoyed from street level except when viewed from a distance or from across the street.</p>	<p>Rating</p> <p>High</p> <p>low</p>
4.	<p>Does the street relate to the urban network of adjacent streets and streetscapes?</p> <p>The Eloff street precinct is well-defined as an urban entity on its own but some effort was made to connect the precinct with streets crossing from east to west during the upgrading of some of these streets.</p>	<p>Rating</p> <p>high</p>

6.3. Section 38(3) (c) An assessment of the impact of the development on such heritage resources.

The street: - the upgrading of the street will have a medium impact on the street but the objective of the upgrading is to extend the life of the street and not demolish it.

Pavement: - as the pavements will not be changed completely and the objective of the proposed development is to create uniformity rather than variety the development will only have a medium to low impact on the pavements.

Buildings: None of the buildings defining the edge of the streetscape will be demolished or altered in any way resulting in the proposed development having a low impact on the architecture of the buildings along the Eloff Street spine.

6.4. Section 38(3) (d) An evaluation of the impact of the development on heritage resources relative to the sustainable economic benefits to be derived from the development.

The heritage consultants were not part of the commercial planning and the original market related vision for the upgrading of the precinct by the City Council and the JDA.

Fieldwork in the precinct clearly indicates the number of vendors and commercially active individuals in the precinct. The commercial aspect of the precinct cannot be negated in the development.

The design proposals indicate that the vendors will be accommodated in the development during construction and after completion of the project

6.5. Section 38(3) (e) The results of consultation with the communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources.

This report has not been perused by the interested and affected parties and the public participation process still needs to be completed.

6.6. Section 38(3)(f) If heritage resources will be adversely affected by the proposed development the consideration of alternatives.

Although the development plan proposes uniformity in terms of paving materials for the pedestrian areas, an alternative is to treat the areas in front of the identified buildings – where the principal entrances are located – differently by allowing variation in the use of paving materials and allowing these areas to remain open and not be obscured behind trees, rubbish bins, bus stops and any other street furniture.

6.7. Section 38(3)(g) ..Plans for mitigation of any adverse effects during and after the completion of the proposed development.

The entire streetscape be documented by photographic recording of each street block and be compiled into a report serving as an annexure to the application submission for the permit from the PHRA-Gauteng.

7. RECOMMENDATIONS

The proposed development may commence but with some conditions:

Street

- The street name be retained.
- The street alignment be retained but the edges be altered in the same way as the sections between Albertina Sisulu and Pritchard Streets
- The existing paved areas crossing Eloff Street be retained and upgraded
- Similar paving be introduced on the corners of Pritchard and Eloff Streets
- All pedestrian crossing be done in face bricks

Pavements

- All existing trees be retained
- All areas around the stems be expanded to 2m by 2m and the soil covered with stone to allow water penetration into the ground
- The design and material specifications of the pedestrian surfaces be determined in collaboration with a registered landscape architect.
- All pedestrian surfaces be upgraded and bus stops, refuse bins and seating be designed and placed in such a manner that they could be easily maintained and cleaned.
- The sculpture on the corner of Eloff and Commissioner Street be relocated to a less risky location.

Buildings

- The entrances of the four buildings indicated on the street diagram be celebrated with special treatment regarding the design of the paving directly in front of these entrances and the views towards these entrances not be obscured by the planting of trees or the introduction of seats, bus stop shelters or vendor related structures of any kind.

Mitigation

- The entire streetscape be documented by photographic recording of each street block and be compiled into a report serving as an annexure to the application submission for permits from the PHRA-Gauteng.

8. REFERENCES

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