



Document Title	CRA Heritage Application Process
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Executive Summary

Alterations, additions, and demolitions affecting buildings older than 60 years are regulated by the National Heritage Resources Act, 25 of 1999, and administered in Gauteng by the Provincial Heritage Resources Authority – Gauteng (PHRA-G). PHRA-G is the statutory decision-maker and issues all heritage permits, approvals, and conditions. Where applicable, City of Johannesburg planning and building approvals are also required.

The CraigPark Residents' Association (CRA) plays a non-statutory, community-level advisory role within this framework. The CRA does not approve or refuse applications and does not assess architectural merit. Its involvement is limited to providing informed community comment to PHRA-G, focused on local context, streetscape character, protection of mature trees, and the management of construction-related impacts on residents.

Heritage-triggered construction and demolition activity can be highly disruptive if not properly managed. Extended demolition periods, prolonged construction timelines, noise, dust, traffic congestion, contractor parking, and damage to verges and trees materially affect the peace and liveability of established garden suburbs. The CRA's process exists to help ensure that development proceeds lawfully, respectfully, and with due regard to neighbouring residents.

This guideline explains:

- the statutory heritage process administered by PHRA-G;
- where and how the CRA fits into that process;
- the geographic limits of the CRA's mandate as defined in its Constitution;
- submission requirements and conduct expectations;
- the scope and limits of the CRA's review; and
- the circumstances under which the CRA may issue, decline, or withdraw a support or "No Objection" letter.

Only properties located within the CRA's constitutionally defined area may be reviewed by the CRA. Submission of a complete PHRA-G application, together with the CRA's specific community-review requirements, is mandatory. The CRA will only issue a support or "No Objection" letter once all requirements are satisfied and the registered owner has provided the required written undertakings.



This document is intended to promote clarity, consistency, and procedural fairness, while protecting the established character, amenity, and environmental quality of Craighall, Craighall Park, and the incorporated parts of Dunkeld West.

1. PURPOSE AND CONTEXT

1.1 Statutory Heritage Framework

Alterations, additions, and demolitions affecting structures older than 60 years are regulated in terms of the National Heritage Resources Act, 25 of 1999 (NHRA). In Gauteng, the statutory authority responsible for administering this process is the Provincial Heritage Resources Authority – Gauteng (PHRA-G).

PHRA-G is responsible for:

- assessing applications under Section 34 of the NHRA (structures older than 60 years);
- determining whether a Heritage Impact Assessment (HIA) is required under Section 38;
- issuing permits, records of decision, approvals, conditions, or refusals;
- enforcing compliance with the NHRA.

PHRA-G approval is independent of, and does not replace, City of Johannesburg building plan approval. Where applicable, both processes must be complied with.

1.2 Our Suburbs and Their Character

Craighall, Craighall Park, and parts of Dunkeld West are established garden suburbs developed largely between the 1920s and 1950s on former farm portions and smallholdings. Their defining characteristics include:

- Tree-lined streets and generous stands forming part of the Braamfontein Spruit and Delta Park green corridor.
- A layered built form, comprising both heritage-age dwellings and sensitive modern infill, reflecting gradual and organic renewal rather than wholesale redevelopment.
- A strong sense of place created by mature vegetation, scale, and long-standing community occupation.

Most properties fall within the heritage process solely because the primary structure is older than 60 years. This does not automatically imply intrinsic heritage significance.



However, the *collective streetscape, tree canopy, environmental setting, and residential amenity* are of demonstrable value and require careful consideration.

1.3 PHRA-G Community Comment and the CRA's Role

As part of its assessment of applications under the National Heritage Resources Act, PHRA-G routinely seeks or accepts written comment from local residents' associations to assist in understanding local context, neighbourhood sensitivity, and potential community impacts that may not be evident from plans and reports alone.

Within its constitutionally defined area, the CraigPark Residents' Association fulfils this role by providing community-level comment to accompany PHRA-G applications. This typically takes the form of a support or "No Objection" letter where the CRA is satisfied that community considerations have been appropriately addressed.

The CRA's input is advisory only and is intended to inform PHRA-G's statutory decision-making, not to replace or duplicate heritage assessment, nor to approve or refuse applications.

1.4 Why Community-Level Review Matters

Alterations, demolitions (including partial demolitions), and construction activity triggered by the heritage process can be highly disruptive to residents if poorly planned or poorly managed. Extended demolition periods, prolonged construction timelines, excessive noise, dust, traffic congestion, contractor parking, and damage to verges or trees materially affect neighbouring properties and the broader suburb.

Community-level review exists to help ensure that:

- development proceeds lawfully and in the correct sequence;
- the character, peace, and liveability of established garden suburbs are respected;
- mature trees, verges, and streetscapes are protected; and
- construction activity is conducted in a manner that is orderly, considerate, and compliant with municipal by-laws.

This review does not seek to prevent development, but to balance individual property rights with the legitimate interests of surrounding residents.



2. CRA ROLE, MANDATE, AND LIMITS

2.1 Nature of the CRA's Role

The CraigPark Residents' Association is a no-nonsense, civically active residents' association with a long-standing presence in Craighall, Craighall Park, and the incorporated parts of Dunkeld West. The CRA has an established track record of constructive engagement with the City of Johannesburg, provincial authorities, and professional stakeholders on planning, heritage, infrastructure, and neighbourhood management matters.

The CRA's role is grounded in protecting the suburb as a place to live, while ensuring that development — one of the most significant and sensitive portfolios affecting residents — is undertaken lawfully, transparently, and responsibly.

Within this context, the CRA performs a local, non-statutory advisory and coordination role, and:

- reviews heritage-related submissions at community level;
- considers local context, streetscape character, and environmental factors, including mature trees;
- focuses on construction sequencing, site conduct, and likely impacts on neighbouring residents;
- coordinates community input where appropriate; and
- issues a support or "No Objection" letter for submission to PHRA-G where the CRA is satisfied that community-level considerations have been addressed.

The CRA does not grant approvals and does not act as a statutory authority.

Final decision-making authority rests with PHRA-G and, where applicable, the City of Johannesburg.

2.2 Geographic Boundary of CRA Mandate

The CRA may only review applications relating to properties that fall within the geographic area incorporated into the CRA, as defined in its Constitution.

The CRA cannot and will not review applications for properties that fall outside this incorporated area, regardless of cadastral descriptions, ERF numbering, or historical naming conventions.



This issue arises most commonly where:

- A property carries a Craighall Park ERF number; but
- The official street address or suburb designation falls within Parkhurst, Blairgowrie, Parktown North, or areas of Dunkeld West not incorporated into the CRA.

In such cases, the property falls outside the CRA's constitutional mandate, and the CRA is not authorised to review the application or issue any form of support or comment.

Applicants may engage directly with PHRA-G or with the relevant residents' association for the suburb in which the property is formally situated.

The CRA Constitution, which defines the Association's geographic remit, is available at: <https://cra.org.za/constitution/>

3. STATUTORY REFERENCES AND EXTERNAL AUTHORITIES

3.1 Applicable Legislation and Authorities

This section provides statutory reference context and supporting resources for the heritage process outlined in Section 1.1. It does not restate or replace the requirements of the National Heritage Resources Act or PHRA-G guidance.

Key reference authorities and instruments include:

- National Heritage Resources Act, 25 of 1999 (NHRA)
- Provincial Heritage Resources Authority – Gauteng (PHRA-G)
- Johannesburg Heritage Foundation (JHF)
- City of Johannesburg planning and building control authorities

PHRA-G approval is independent of, and does not replace, City of Johannesburg planning or building plan approval. Where applicable, both processes must be complied with.



4. PROCESSING TIME AND CONDUCT

4.1 Timeframes and Review Discipline

- Allow a minimum of four weeks from receipt of a complete PHRA-G application pack and cleared CRA payment for CRA review.
- Incomplete or unpaid submissions will not be reviewed. The review period commences only once both completeness and payment are confirmed.
- Where referral to the Johannesburg Heritage Foundation (JHF) is required, a further four weeks should be allowed.
- Requests for expedited or urgent review cannot be accommodated.

4.2 Professional Conduct Expectations

- Architects, consultants, and applicants are expected to familiarise themselves fully with this guideline before engaging the CRA.
- Procedural queries will not be dealt with telephonically or through informal communication channels or by approaching various committee members directly.
- Illegal demolition, unauthorised construction, or unauthorised tree removal will be reported to PHRA-G and the City of Johannesburg.
- The CRA reserves the right to disengage from applications where conduct is disrespectful, bullying/pressurising, misleading, or persistently non-compliant.

5. APPLICATION FEES

5.1 Fee Structure

Applicant Type	Fee	Notes
CRA Member (≥ 24 months)	R1 500	Proof of continuous membership required. If paying via PayFast, state the name and start date of membership. If paid via EFT send us the POP(s).
Non-Member	R3 500	Applicants are encouraged to join the CRA.

5.2 Payment Conditions

- All fees are **non-refundable**.
- Fees cover administrative coordination, file management, and the consulting architect's site inspection and assessment.
- Review will only commence once payment reflects in the CRA account.



Banking Details

CraigPark Residents' Association
Bank: Standard Bank SA Ltd
Account Type: Cheque
Account Number: 200 874 977
Branch Code: 007205
Reference: *Heritage App – ERF [number]*
Email to: admin@cra.org.za

6. SUBMISSION REQUIREMENTS

6.1 Submission Method and Completeness

Send one complete application pack to admin@cra.org.za.

- All required documents must be included in a single email submission.
- Partial or piecemeal submissions will not be processed.
- Submissions sent to other addresses will be disregarded.
- The CRA will not request missing information.

Only one point of contact (either the registered owner or the architect / consultant) will be recognised. If multiple parties provide instructions or conflicting information, the application will be placed on hold until the nominated single contact resolves the issue.

6.2 PHRA-G Application Requirements

A complete PHRA-G application, prepared strictly in accordance with PHRA-G's published forms, checklists, and (where applicable) HIA requirements, must be submitted to the CRA as part of the review pack.

The CRA does not restate PHRA-G requirements and will not advise on or remedy deficiencies in PHRA-G documentation. If the PHRA-G component of the submission is incomplete, CRA review will not proceed.

PHRA-G reference material is available at:

<https://www.theheritageportal.co.za/organisation/provincial-heritage-resources-authority-gauteng-phra-g>



6.3 CRA-Specific Submission Requirements

In addition to the complete PHRA-G application, the following CRA-specific items are required for community-level review:

1. Site and streetscape photographs clearly illustrating:
 - a. the relationship of the property to neighbouring sites;
 - b. the existing streetscape character; and
 - c. all mature trees on the property and verge.
2. Architectural drawings / plans clearly indicating:
 - a. proposed works;
 - b. trees to be retained; and
 - c. tree protection and construction safeguarding measures.
3. Proof of CRA membership contributions, where applicable.
4. Proof of payment of the applicable CRA application fee.
5. Owner's written motivation, confirming that no unauthorised construction, demolition, site clearing, or tree removal has taken place.

Incomplete packs will not be processed.

7. CRA REVIEW AND ASSESSMENT

7.1 Scope of CRA Review

The CRA's review is limited and contextual. The CRA does not:

- assess architectural style, taste, or design merit;
- adjudicate heritage significance in statutory terms;
- approve or refuse applications;
- substitute itself for PHRA-G or the City of Johannesburg.

The CRA's review focuses on community-level impacts, specifically:

- streetscape coherence and neighbourhood context;
- protection of mature trees, verges, and landscaping;
- anticipated construction and demolition impacts on neighbouring residents;
- procedural completeness of the submission for community comment purposes.



7.2 Review Steps

Verification

Confirmation that a complete PHRA-G application and all CRA-specific requirements have been submitted, and that payment has cleared.

Site Visit

A site inspection may be conducted by the CRA's consulting architect to understand the existing context, streetscape, tree canopy, and potential impacts of the proposed works.

Contextual Assessment

The CRA considers whether the proposal, as presented:

- materially alters the established streetscape or scale;
- poses a risk to mature trees or verge vegetation;
- is likely to cause disproportionate disruption to surrounding residents.

7.3 Assessment Outcomes

Based on the above, one of the following outcomes will apply:

1. No material community or contextual impact identified: The CRA prepares a draft support or "No Objection" letter, subject to receipt of the signed Owner Acknowledgement & Undertaking.
2. Potential community, environmental, or heritage-context impact identified: The CRA refers the matter to the Johannesburg Heritage Foundation (JHF) for specialist comment prior to finalising its position. This may extend the review period.

The CRA reserves the right to decline to issue a support letter where community impacts cannot be adequately mitigated.



8. OWNER ACKNOWLEDGEMENT AND UNDERTAKING

8.1 Purpose and Status

Before any CRA support or “No Objection” letter is issued, the registered property owner must sign and submit the CRA Owner Acknowledgement & Undertaking Form.

The Undertaking records commitments relating to lawful sequencing of approvals, construction conduct, protection of trees and verges, and compliance with municipal by-laws.

9. APPLICANT RESPONSIBILITIES

9.1 General Obligations

- The burden of proof rests with the applicant to demonstrate that proposed works do not adversely affect streetscape character, mature trees, or neighbouring amenity.
- No work may commence until PHRA-G approval has been granted.
- Architects and consultants are expected to understand PHRA-G requirements; ignorance is not a defence.

9.2 Consequences of Non-Compliance

- The CRA may withdraw its support or “No Objection” letter where undertakings are breached or unauthorised work occurs.
- The CRA may report non-compliance to PHRA-G, the City of Johannesburg, or other competent authorities.

10. NOTE FROM THE CRA

10.1 Community Governance and Expectations

CRA committee members are volunteers who dedicate professional expertise and personal time to community governance.

Respectful, complete, and compliant engagement ensures an efficient process and supports the long-term protection of the suburb’s character and liveability.