

OMP

From: Zaahira Mahomed <zaahira.mahomed@gmail.com>
Sent: Monday, 17 November 2025 15:38
To: OMP
Subject: Formal Objection in Terms of Section 38 of the National Heritage Resources Act (NHRA) – Proposed Redevelopment of the Oude Molen Precinct

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Dear Sir/Madam,

I write to lodge a formal and unequivocal objection, in terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999), to the proposed redevelopment of the Oude Molen Eco Village precinct.

This redevelopment poses a direct and irreversible threat to a landscape that holds biophysical, cultural, social and environmental heritage value—all of which fall squarely under the protective intent of the NHRA.

1. Environmental and Ecological Significance

The Oude Molen precinct is home to a functioning wetland system, an integral part of the local hydrological network. This wetland supports a large and diverse bird ecosystem, including vulnerable and protected species that depend on this habitat for feeding, breeding, and migration. Any alteration to this system would constitute a significant heritage resource impact as defined under Section 3(2)(g) of the Act, which recognises natural landscapes with environmental significance as heritage resources worthy of protection.

2. Cultural Landscape and Social Value

The precinct is not merely open land — it is a living, community-driven eco village with a decades-long ethos of environmental stewardship. Its recycling initiatives, small-scale farming projects, and community-based sustainability efforts contribute to Cape Town's intangible cultural heritage and social identity. Under Section 3(2)(c) of the NHRA, this living heritage qualifies as a protected cultural landscape.

3. Equine Welfare and Existing Land Use

Oude Molen is home to several rescued horses that rely on this land for safe rehabilitation and daily care. The area offers one of the few remaining central, accessible equine spaces in Cape Town. The proposed redevelopment disregards the long-standing existence and welfare needs of these animals, and threatens to eliminate essential open, naturalised space required for their wellbeing. The displacement of these horses would be a direct violation of existing land-use patterns and the social commitments upheld for years by the precinct.

4. Recreational and Community Benefits

The precinct serves as a public recreational facility, used by residents across Cape Town for walking, riding, environmental education, and mental-health restoration. In a rapidly densifying city, the loss of such a space would significantly erode public access to nature—an amenity with recognised social and heritage value under the Act.

5. Failure to Consider Alternatives and Heritage Impacts

Section 38 requires a thorough Heritage Impact Assessment (HIA), including stakeholder engagement, assessment of cumulative impacts, evaluation of reasonable development alternatives, and specialist ecological studies. The proposed redevelopment, as currently presented, fails to demonstrate:

- that alternatives have been adequately investigated,
- that heritage resources have been sufficiently identified,
- or that the severe environmental and cultural impacts can be mitigated.

Proceeding without comprehensive and transparent assessment would contravene the NHRA and undermine the precautionary principle mandated by South Africa’s heritage and environmental legislation.

Conclusion and Formal Request

Given the significant and irreplaceable heritage, ecological, social, and cultural value of the Oude Molen precinct, I formally request that:

1. The redevelopment application be rejected, or
2. At minimum, that no approval be granted until a full, independent Heritage Impact Assessment—including ecological, hydrological and social-impact studies—is completed, published, and subjected to genuine public participation.

The redevelopment of this area would permanently destroy a heritage landscape that cannot be recreated. The Western Cape cannot afford to trade away one of its last remaining natural, community-driven green spaces for short-term development interests.

I trust that Heritage Western Cape and the Western Cape Government will uphold the principles of the NHRA and protect this vital heritage resource.

Thank you,
Zaahira Mahomed
0616941140

Zaahira Mahomed

On Fri, 14 Nov 2025 at 07:20, OMP <OMP@westerncape.gov.za> wrote:

Dear Interested and Affected Parties for the proposed Oude Molen Precinct redevelopment:

This email serves as announcement that members of the public and interested and affected parties are invited to comment on the Revised Heritage Impact Assessment and associated Annexures, for the proposed plan for the Oude Molen Precinct. **The 30-day commenting period will end on 15 December 2025.**

Any person wishing to object to or comment on the application on heritage grounds must submit such objection or comment in writing to the Oude Molen Precinct Project Office at email OMP@westerncape.gov.za on or before **15 December 2025.**

Kindly find attached copy of the NOTICE OF PUBLIC PARTICIPATION PROCESS HERITAGE IMPACT ASSESSMENT (HIA) OUDE MOLEN PRECINCT, PORTION OF ERF 26439-RE, CAPE TOWN, which includes a link to download the relevant documentation.

Kind Regards / Vriendelike Groete

OMP Project Office

Department of Infrastructure

Chief Directorate: Economic Hub

Western Cape Government