



CITY HERITAGE COMMENT TO HERITAGE WESTERN CAPE ON NHRA APPLICATIONS

PART 1 SITE AND PROPOSAL PARTICULARS		Case No:	
Site address 353 Main Road (Former Tafelberg School site)		Erven 1424, SEA POINT	
Owner WESTERN CAPE GOVERNMENT	Tel	Applicant ZUTARI with HIA by Rennie Scurr Adendorff	Tel
Proposal summary		Site enablement HIA in terms of Section 38(3) of the NHRA, Act 25 of 1999	
Previous HWC submission		HWC case no:	Has the work started? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Conservation body		Sea Point, Fresnaye & Bantry Bay	

OFFICIAL USE ONLY

PART 2: HERITAGE TRIGGERS & SIGNIFICANCE		NHR Act Section: 38	HPOZ	Detail:			Declared PHS	
2013 – 2018 Heritage database (as displayed on CityMap viewer)		National I	Provincial II	Metro IIIA	Neighbourhood IIIB	Street Context IIIC	Potential IIIC	NCW 4
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Summary Statement of Significance:

Erf 1424

Built on the site of Ellerslie Estate. Sandstone building with slate roof. Double storey extension built in 1913 by W. Black. Archaeological potential - ruins of early 19th century villas underneath the sports fields.

Sea Point HPOZ is an area of heritage significance comprising a rich and dense composition of housing typologies and periods. A sprinkling of houses date back to the mid-19th century while most of the building stock is turn of the century row housing – both single and double storey, interspersed with Edwardian houses and intuitional buildings. From the early-mid 20th century to today blocks of flats have been replacing more historical fabric. Some of these flats themselves are of architectural interest and contribute to the richness of the area.

PART 3: PRE-SUBMISSION CONSULTATION (HRS ADVICE TO APPLICANT)

Summary advice to applicant:

Additional information requested:

PART 4: CITY COMMENT ON PROPOSED DEVELOPMENT TO HWC

This does not in any way constitute approval or refusal of an application

Drawing No(s) Preferred Viable and Feasible Development Concept dated 29 October 2025 and HIA by RSA dated 11 November 2025

Rev -

Dwg date -

INTRODUCTION

The following recommendation serves as an interim comment. As suggested by the applicant and acknowledged by our branch in the email dated 4 December 2025, a more detailed supplementary comment may be submitted by 16 January 2026.

These comments are prepared by E&HM (Heritage) as part of the Western Cape Government's Public Participation process for the enablement of the former Tafelberg School Site, registered as Erf 1424, 353 Main

Road, Sea Point. The site enablement process seeks to ensure that the property can become a catalyst for spatial transformation within the inner urban core.

BRIEF BACKGROUND

As part of the site enablement process, several investigations and studies have been conducted to inform potential development on the site, including a Heritage Impact Assessment (HIA) and supporting documentation.

Documents to be reviewed include the *Contextual Analysis Final Report* dated 14 November 2025, together with the following annexures:

- Annexure G: Development Concept Report
- Annexure H: Design Guidelines Report
- Annexure I: Visual Impact Assessment
- Annexure J: Social Historical Study
- Annexure K: Architectural and Context Analyses
- Annexure L: Landscape Guidelines

Due to the extensive nature of the referenced reports and limited time available for full review, these comments are preliminary. A more comprehensive submission will follow by 16 January 2026.

A development vision was workshoped to comprehend the needs, wants and desires of each department regarding the development of the site to create and balance a shared vision with clear directives to guide future concepts and proposals.

Multiple specialist site investigations were undertaken during the enablement process. Key elements identified for incorporation into future development include:

- the potential accommodation of an urban school,
- the use of heritage as a key informant in decision-making,
- the inclusion of a mix of housing opportunities, and
- the exploration of other appropriate land uses afforded by the site.

The contextual analysis informed the formulation of a development concept, which will ultimately guide future land use planning and applications for development rights.

Various development options were considered, with **Option 3D** identified by the applicant as the preferred option offering maximum development potential.

POLICY FRAMEWORK

Any alterations, and particularly replacement structures or new interventions, must comply with development policies and heritage management principles as required within the statutory context of the HPOZ and the PHS.

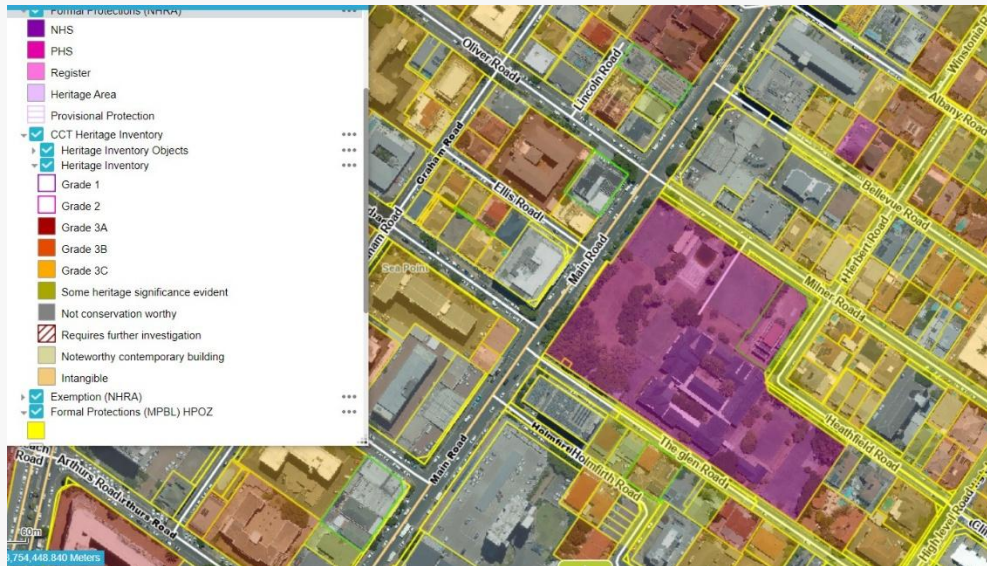
According to the *Table Bay District Plan (2023)*, spatial objectives include the protection of character-defining elements of the Sea Point Heritage Protection Overlay Zone. This includes the retention of grain, scale, form, and the predominantly residential character of the area—further reinforced by the *Urban Design Policy (2013)*.

The City's *Environmental Strategy (2017, Policy No. 46612)* includes, inter alia, the following directives under Section 6.11: Protected Cultural Heritage:

- 6.11.1. the City will consider all developments, including municipal infrastructural development, and land-use changes in terms of their potential impact on the city's cultural heritage, and ensure that negative impacts are prevented, or where they cannot be prevented, minimised or mitigated, and ensure that positive impacts are identified, maximised, and enhanced;

- 6.11.3. the City will ensure that its cultural heritage, including the built environment and sites of cultural and historical significance that promote Cape Town's unique sense of place and celebrate the city's diverse cultures, are appropriately protected and managed, while promoting sensitive new development and adaptive re-use in line with the City's densification policy.

HERITAGE SIGNIFICANCE: PHS site located within the Sea Point HPOZ.



The contextual character of the area, in terms of scale and grain, is coherent and consists of a wide variety of building typologies. Buildings along Main Road range from low-rise, single-storey Victorian-era villas to small shops and four-storey mid-century apartment buildings, interspersed with occasional multi-storey mixed-use developments and a low-rise petrol station.

The masonry wall edging the site—together with the mature trees and deep garden setback—allows for exceptional views of the mountain from Main Road, significantly contributing to the quality, openness, and sense of place of this part of Sea Point. The variety in grain, period and architectural style, combined with the park-like quality of the open space, lends this sector of Sea Point a distinctive and valuable contextual character.

The following screenshots illustrate the broader heritage environment of the subject site and the predominant building height of apartment blocks between Arthurs Road and Marais Road:



Oblivision view, facing east, indicating the predominant height along this portion of Main Road (City Map Viewer 2025).



Oblivision view, facing south, indicating the predominant height along this portion of Main Road (City Map Viewer 2025).

Overall, the site plays an important historic and contextual role in the evolution of Sea Point. Its landmark qualities are underpinned by one of the largest remaining open green spaces defined by a historic boundary wall, a tree-lined approach, the former Ellerslie High School building—which holds high architectural, aesthetic, intrinsic and socio-historical significance—and the contextually notable Wynyard Mansions.

HERITAGE AND TOWNSCAPE INDICATORS AND RESPONSES

The Heritage Impact Assessment and the Contextual Analysis Report aim to identify key informants to guide the site enablement process and proposals. These documents reference relevant planning and policy frameworks which motivate the development of the site for social housing. They recognise the need to conserve heritage resources and carefully assess new development within historic precincts—such as this site—in terms of scale, form, placement and architectural language, so as not to detract from the significance of the precinct itself.

Furthermore, both reports emphasise the incorporation of intangible heritage and the receiving social context to optimise heritage as a developmental asset. This approach promotes social integration, supports sustainable utilisation of heritage resources, and enables urban regeneration in a way that strengthens economic potential and enriches urban life.

E&HM endorses the overall approach outlined in the Heritage Impact Assessment's heritage informants related to **townscape and architectural impacts (Section 10.3)**.

However, the proposed height of 11 storeys on Portion 1 **requires reconsideration and further development**. As per the HIA, 'a lower building block on main Road (as in Concept 1 and Concept 2) would have less visual impact in the context'.

The photomontages in Section 10.4.3—particularly Viewpoints 4, 7, and 8—are useful in illustrating that the current height proposal is inconsistent with the established character of 6–9 storey development along this portion of Main Road (as indicated in the above screenshots). The near-distant, pre-1971 building at 361A Main Road (Erf 1383-RE), although tall, is set back from Main Road and should not be considered as an appropriate height determining precedent.



Figure 121. Viewpoint 7, photomontage looking south west down Sea Point Main Road towards the site (Square One, 2025)

E&HM notes the proposed mitigation measures but encourages further design refinement to reduce the visual impact of height on the Main Road streetscape and the broader context of medium-scale apartment blocks.

E&HM has considered the different options and takes cognisance of the preferred option, namely Option 3D, as the option that maximised the site potential and provides the largest number of social housing units. In this option, the entire 11 storey building on development parcel 1, is Open Market Residential with retail on ground floor.

However, our branch has concerns with this option, as it will negatively impact the high significance of the historic school, the Main Road streetscape, and the heritage environment of the site.

The proposed renders (pp. 114 and 115), although not representing the final design of Concept 3D, make a convincing argument in terms of façade treatment and roof gardens, which act as mitigating measures.

One of the character-defining elements of Main Road and the heritage protection overlay zone is the presence of apartment buildings along this portion of Main Road. The proposed height of 11 storeys will, however, obscure the remainder of the site—both the new work and the school building—and will not enhance the Main Road streetscape, as it is not in keeping with the established character of the area (Figure 115, p. 124).

To present a more viable solution for the development, it is suggested that the height of the apartment block on Portion 1 be limited to **a maximum of eight storeys**.

E&HM RECOMMENDATIONS AND SUGGESTIONS

Subdivision into Portions 1, 2 and 3

- E&HM supports the proposed subdivision into Portions 1, 2 and 3, on condition that all new work proposed for each site is submitted to HWC for endorsement. It is recommended that this submission occurs prior to the building plan stage (BDM process) at the City of Cape Town.
- Subdivision is further supported on condition that development on the individual sites does not negatively impact the high significance of the remaining PHS portion, specifically the historic school building.

Development on the Proposed Subdivided Portions

- The introduction of multiple residential units in the form of apartment blocks is supported in principle; however, scale, height and siting require careful consideration to ensure the development does not appear overbearing or visually diminish the architectural and aesthetic significance of the school building.
- Low-scale typologies with adequate setbacks from the school will support and enhance its heritage significance.
- The vertical articulation of elevations and material selection is encouraged to reflect elements associated with heritage environments such as the PHS and the surrounding context.
- Interface treatments along Main Road, Milner Road, Herbert Road, Heathfield Road, and any potential internal roads must be designed so as not to negatively impact the overall heritage significance of the site or its heritage context.
- When submitting proposals for each portion to HWC, the application should include detailed plans with architectural elements, materials, and features clearly specified.
- Roof gardens and extensive landscaping, as illustrated in visual renders, are supported. Detailed landscape plans must be submitted and conditioned as part of HWC approval.
- E&HM recommends that HWC's ROD for the subject site be included in all future applications for development of the subdivided portions as part of the City's BDM process.

In General

E&HM takes cognisance of the HWC note dated 4 September 2023, stating that the whole of the subject site is formally protected.


Our department strongly recommends that any potential future de-proclamation application for the new portions should only occur after completion of the social housing developments. This is to safeguard the applicant's intention to honour and protect the intangible and socio-historical significance of the site through the incorporation of affordable housing, including the important social housing component.

It is of great concern that no further attention has been given to the highly significant school building site. While it is acknowledged that the focus of the HIA and the Contextual Analysis Report is mainly for the site enablement, there is concern that the redevelopment of the portion of the site that will remain a PHS has not been seen as an integral part of the overall redevelopment. The PHS site should not be seen as something to be dealt with at a later stage. It should be the catalyst for the housing development, and the social housing portion should be strongly linked to it without encroaching on it or turning its back on it. The market related site development should not overpower and obscure the historic setting of the school by being over-scaled and insensitively designed.

CONCLUSION

The proposed subdivision and introduction of apartment blocks, including affordable and social housing on Portions 2 and 3, is supported on condition that design development continues. These sites will be located within the Sea Point HPOZ and Land Use Management Consent will be required for these developments to determine whether they impact negatively on the character of the HPOZ, or not.

The proposed Open Market Residential and retail development on Portion 1 should be reduced in height. The building is to be fragmented and articulated to fit into the HPOZ fabric and should relate and respond positively to the adjacent PHS site, as well as the materiality of the HPOZ.

<p>Support <input type="checkbox"/></p>	<p>Support with condition <input checked="" type="checkbox"/></p>	<p>Not Support <input type="checkbox"/></p>	<p>Official's Names: A.Combrink & E Mendelsohn</p>	<p>Signature </p>
---	---	---	---	---