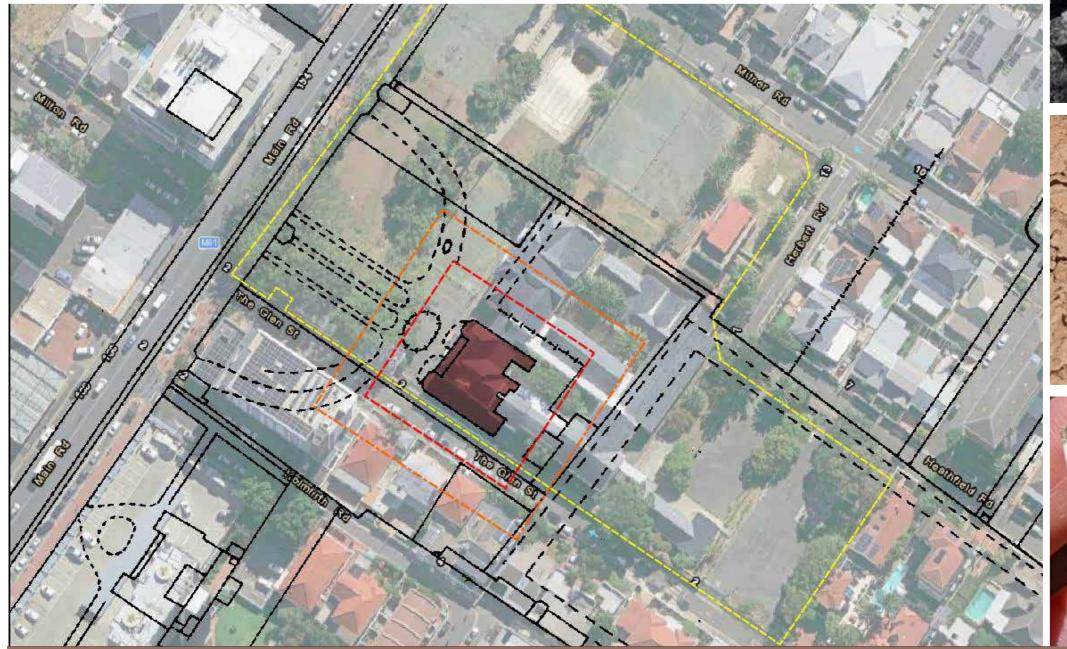
DESKTOP ARCHAEOLOGICAL IMPACT ASSESSMENT: REDEVELOPMENT OF 353 MAIN ROAD, SEA POINT

HWC REF: 24020910

submitted in terms of Section 38(4) of the NHRA (1999) for proposed redevelopment of 353 on Main, Erf 1424, Sea Point, Cape Town











Prepared by Rennie Scurr Adendorff on behalf of Zutari for the Western Cape Government



EXECUTIVE SUMMARY Site Name

Ellerslie / Tafelberg School

Location

353 Main Road Sea Point

Locality Plan



Development Description

Redevelopment of the site is proposed, seeing the construction of residential apartments incorporating a mix of market-related and affordable housing on site, with retail at ground floor. The school building and its lawns to the north west are to be subdivided off from the development and have been allocated to the Department of Social Development for use for their own purposes.

Archaeological Heritage Resources Identified

No archaeological remains are visible on site, and only two ceramic sherds were found during the excavation of five geotesting holes across the site.

It is possible that archaeological material associated with the C19th Ellerslie Homestead may persist on site, or more recent material associated with the use

of the site for a girls school during the C20th, but little to no significant deposits or features are anticipated across the area intended for redevelopment in terms of this proposal.

Remnants of the old Ellerslie Road surface might survive below ground level, but these are of low significance.

Anticipated Impacts on Archaeological Heritage Resources

Impacts to significant archaeological sites, features or materials are not anticipated as the proposed development excludes the portion of site with potentially high archaeological sensitivity, namely the area of the old homestead which is where the old school building now stands.

Remnant fabric from the old Ellerslie Road alignment could survive below current ground level, and this would be destroyed by the proposed development.

Conclusions and Recommendations

The proposed development will see the transformation of the site, which is likely to have impacts to any below ground archaeological material, structures or features that might persist. However, the school building, and therefore the old homestead site which underlies it, is excluded from the proposed development

Initial below ground exploration, achieved through the test trenches opened up for geotesting yielded almost no archaeological material, and none of any significance. While this does not preclude the presence of further, as yet undiscovered material being located elsewhere on site, it is likely that such material will be in the form of low density, isolated scatters.

Given the exclusion of the homestead site, and the absence of any significant archaeological material revealed during geotesting, it is not anticipated that significant, in situ deposits or materials will be impacted. Remnant historic road fabric could survive along the Ellerslie Road alignment, and if these are cobbles, they should be retained for reuse elsewhere on site.

Generally, significant archaeological impacts are not likely to arise as a result of this proposed development. While the proposed subdivision poses no risk of archaeological impacts, any future redevelopment of the DSD portion will need to undergo a separate process in terms of NEMA to consider likely archaeological triggers.

It is recommended that:

- This AIA be endorsed;
- Initial inspection of foundation trenches be undertaken when these are opened during construction phase.
- Initial monitoring of works in the area of the old Ellerslie Road alignment should be conducted, and if cobbles are located there, these should be retained and reused elsewhere on site.
- Any future redevelopment of the DSD portion will need to follow relevant archaeological processes.
- If any human remains or significant archaeological materials are encountered during construction work all work in that area should be halted, and the area cordoned off until HWC has been notified, and an appropriate course of action can be determined. This may include mitigation through excavation.

No PIA is recommended, but a fossil finds protocol should be provided.

Authors and Date

Katie Smuts - Archaeologist and Heritage Practitioner

3 November 2025

BIO OF AUTHOR

Katie Smuts holds an MPhil from UCT in Archaeology, having specialised in archaeological analysis of historic built fabric and forms. Her BA (Hons) was in Western Cape rock art. Katie has worked as a commercial archaeologist, as a Heritage Officer for the national Heritage Agency, SAHRA, and as Manager of the National Inventory at SAHRA.

Katie currently works for Rennie Scurr Adendorff Architects as archaeologist and senior heritage practitioner. Katie a member of the Association of Southern African Professional Archaeologists (ASAPA), and former member of ASAPA ExCo, having served as chair of the Cultural Resource Management (CRM) Committee, and, later, on the CRM Standing Committee.

She holds accreditation in rock art, coastal shell middens, Stone Age archaeology and grave relocation, with Principal Investigator status in Historical Archaeology.

Katie is a member of the Association of Professional Heritage Practitioners (APHP), and currently serves on HWC's Impact Assessment Committee (IACom).

November 2025

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1.0. INTRODUCTION

1.1. Project Background

Zutari has appointed Rennie Scurr Adendorff to manage heritage processes pertaining to the proposed redevelopment of consolidated Erf 1424 (including unregistered Erf 1675), at 353 Main Road in Sea Point East.

1.2. Statutory Framework

The site, Erf 1424-RE, is situated at 353 Main Road, Sea Point, between The Glen and Milner Roads. Formal protections in terms of Section 27 of the National Heritage Resources Act (Act 25 of 1999) apply given the former National Monument status (1989, Government Gazette No. 12214), and this protection extends to the entirety of the site. Protection therefore includes all structures on site: the nested structures that make up the Ellerslie/Tafelberg school building, with five free-standing structures spread across the site and an apartment building, Wynyard Mansions, on Herbert Road.

As the affected site is larger than 5 000m2, the proposed development triggers Section 38.1 of the NHRA, and a NID was submitted in terms of this section. The Heritage Western Cape Response to the NID required the submission of a Desktop Archaeological Impact Assessment as a component of the Heritage Impact Assessment requested (Annexure A). This report is compiled in response to that requirement.

The entire site is located in the formally declared Sea Point Heritage Protection Overlay Zone (HPOZ).

The site has a split zoning in terms of the Development Management Scheme (DMS): Transport, public road and parking (TR2) along the inner Main Road boundary line, General Business (GB5) adjacent to the TR2 zone, with the remainder zoned General Residential (GR4).

1.3. Work Undertaken to Date

In order to facilitate geotesting on site, necessary to determine the structural viability of the underlying geology, a workplan was submitted to HWC. Five test holes were hand dug across site, and the profiles of these holes inspected by the archaeologist for cultural and/or structural material of significance. The outcomes of these inspections fed into this assessment, and are included in Section 4.2.

1.4. Methodology

This desktop assessment is derived from review and assessment of the following resources:

- Historic and contemporary maps, aerial photography;
- Online image and publications;
- Review of known heritage sites in the area, as reflected on SAHRIS and the Cape Town EGS Viewer;
- Review of heritage assessments in the vicinity as captured on SAHRIS;
- Site visit and inspection of grounds (see for survey trackpaths)
- Inspection and recording of geotesting holes and materials excavated.

1.5. Assumptions and Limitations

No limitations were experienced in the compilation of this report. It should, however, be noted that the entire site is paved and/or built up, and no inspection of below ground features or deposits has been undertaken outside of inspection of the five geotesting holes. Assessment of archaeological sensitivities is therefore limited in its scope to features known from historic maps and surveys, and the presence of further sub-surface deposits, features, structures or other material cannot be discounted.

1.6. Statement of Independence

Rennie Scurr Adendorff has no legal ties to Zutari or any other professionals involved in this proposal. There is no financial gain tied to any positive comment or outcome. Professional fees for the compilation of this report are paid by the applicant, but are not linked to any desired outcome.

2.0. SITE DESCRIPTION

353 On Main, the Ellerslie/Tafelberg High School site, vests with the Western Cape Government and is earmarked for development, including a component of affordable/inclusionary housing. The L-shaped site faces north on to Sea Point Main Road and extends south, up terraced slopes between The Glen Road and Milner Road. The combined erven measure 16 351,3m².

Erf 1424 is occupied by the school building, the oldest part of which was completed in 1901 - a cluster of one and two storey structures developed over 70 years and set well back from the Main Road boundary. Other structures include a free-standing building that is located on the terrace behind the school building extending alongside The Glen, and a swimming pool with built stands and storerooms that lies adjacent to Milner Road. A pavilion style building, the bike shed, added c1930, extends along Glen, between the boundary wall and entrance driveway. The driveway, which dates to an earlier structure on the site, is approached on axis off the Main Road. It is lined with mature wild fig trees, and these and other mature trees surround an open green park space that extends from the school building to the Main Road.

The site is partially enclosed by a boundary wall, which includes stone walling that, along with early walling and stone terraces within the site, pre-dates all structures on the site.

The remainder of open space behind and alongside the main school building is given to sports courts that replaced earlier villas and rowhouses demolished c1970s.

The upper western portion of the site, on the corner of Milner and Herbert Roads, is occupied by a modernist four storey residential apartment building, Wynyard Mansions. Wynyard Mansions was built c1956 and acquired by the school in 1974 along with a neighbouring villa since demolished and now a brownfield site. Most recently, and until their relocation in 2014, Wynyard Mansions has accommodated social housing tenants, administered by the Department of Human Settlements.



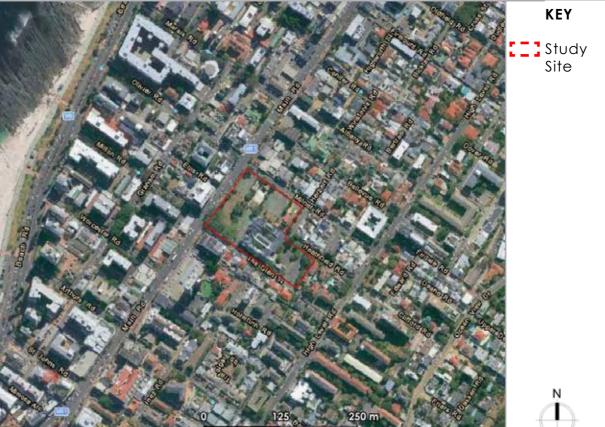
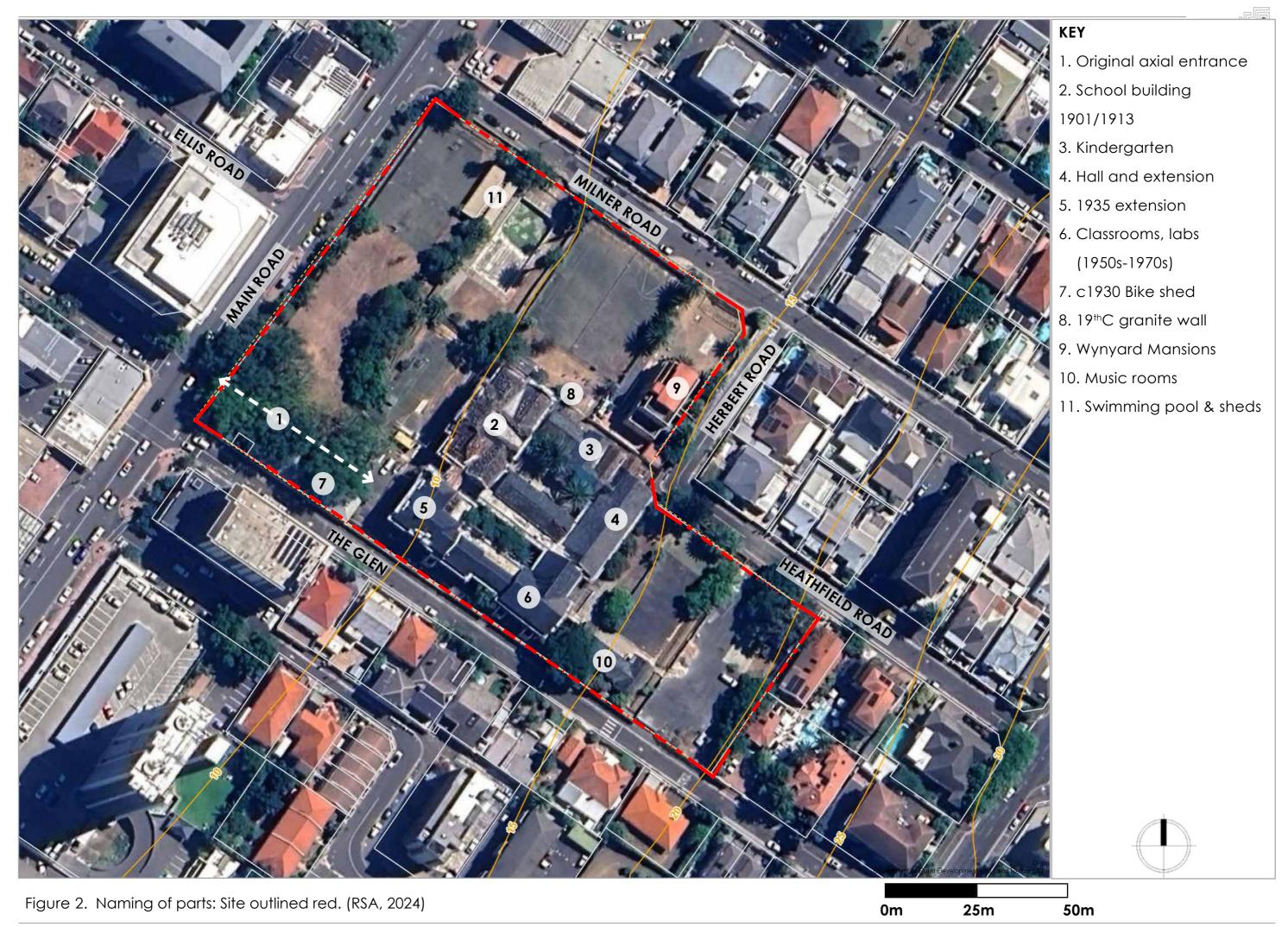


Figure 1. Site location (top) and context (below) (RSA, 2025)



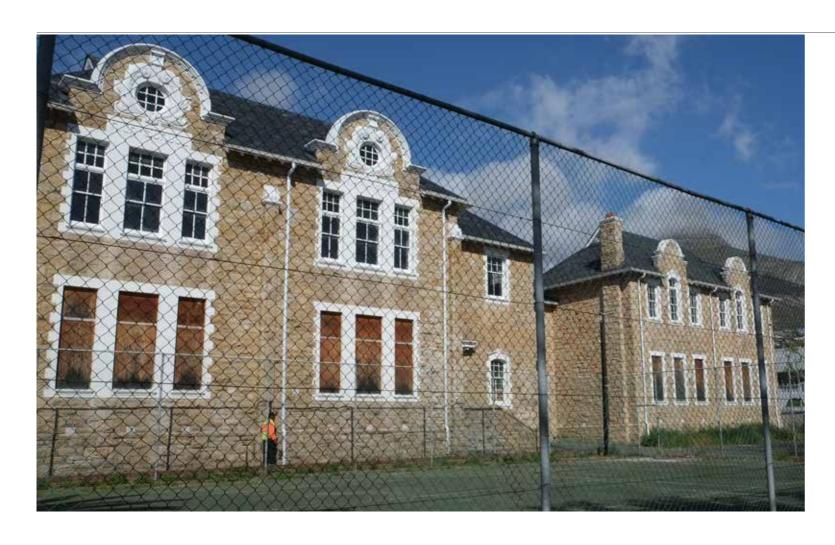




Figure 3. Views of site (RSA 2023)











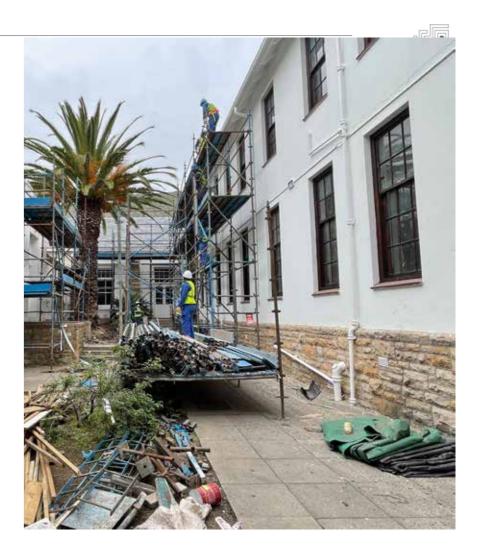








Figure 4. Character and conditions of school grounds near school building (RSA 2023)

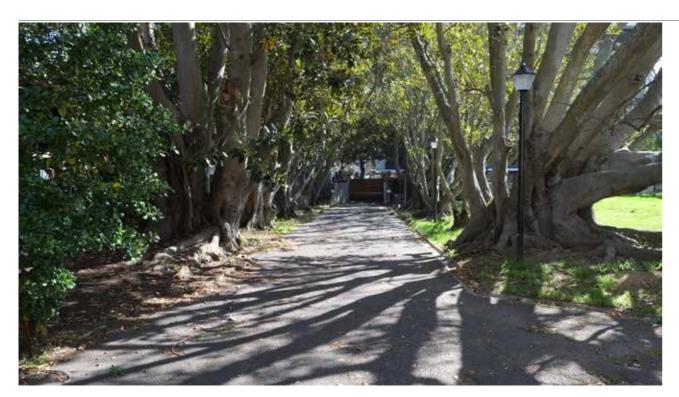


















Figure 5. Gardens and sports fields, bike shed and pool stand (RSA 2023)

3.0. HISTORICAL OVERVIEW: SITE DEVELOPMENT

Following the British annexation of the Cape (1806), the Burgher Senate made 28 lots of ground between Boundary Road to the east, and St John's Road to the west available for sale. These rectangular plots extended from Main Road, over and beyond what is now High Level Road, and formed the basis for the urban blocks still visible in Sea Point. Parcels were bought by a small group of 14 wealthy, land-owning burghers who, using their enslaved labour, developed homesteads with productive lands. The study site straddles two of these early estates, which became known as Ellerslie and Bellevue.

The Elemans survey of 1818 shows structures already occupying these early lots, in keeping with the first phase of urban development. Large, flat roofed homesteads were built on the south side of the main route. Distance from town meant that most of these operated as small farms. They had landscaped sea-facing gardens, with outbuildings that accommodated horses, carts, and possibly also the enslaved workers owned by many of these landowners. Much of the land was cultivated, some for wheat, some used as cattle grazing. The easterly portion of the site for development was part of a double lot developed by 1818 with a large homestead cluster set on the upper slope.

The mid-1800s saw the farmlands subdivided as wealthy British business owners and public officials moved to the area which was serviced by piped water and connected to the City Bowl by the first public omnibus.

The 1860 Snow survey shows the west portion of the study site developed with a large homestead with two projecting lateral bays and a central covered stoep. It is set well back from the road with the central axial arrival, still a feature of the site, established by this point. There are several outbuildings, and the east boundary is walled - part of that walling is still evident on site in the portion of granite wall to the east of the school building.

In 1863 the Cape Town to Sea Point horse-drawn tramway opened. This accelerated development, with structures dedicated to the service such as stables, workers' accommodation and depot buildings. This surge of development is evident in the site's morphology, which saw the portion with the homestead subdivided into four separate lots, with the largest of these including the homestead. Transfer to new owners followed in 1854, 1957 and 1862 (SG 3419/1899). Despite the separate ownership, the site remained a

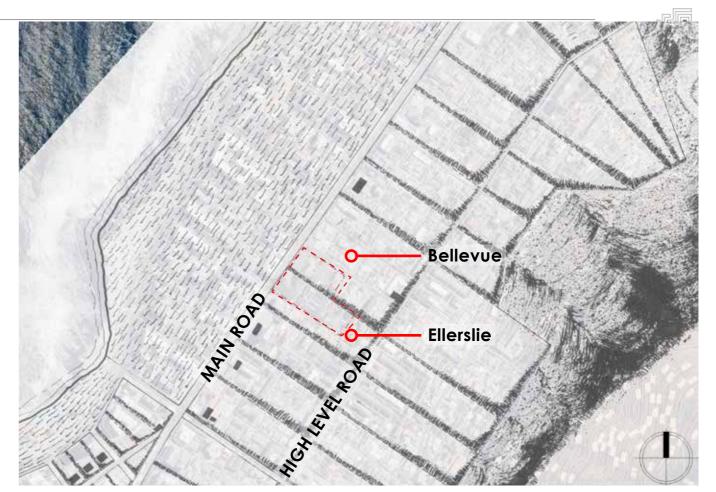


Figure 6. 1818 Elemans Map shows boundaries of lots, with a structure on Lot 27. Site outlined in red. (CoCT EGSViewer, 2023)



Figure 7. 1860 Snow Survey shows the site developed with a large homestead, outbuildings and a central axial arrival that corresponds with the existing driveway off Main Road. Site outlined red. (CoCT EGSViewer, 2023)

coherent estate, as shown on the 1878 Wilson survey, set in developed grounds with orchards and gardens, and surrounded by pine trees (Murray 1964: 70). It is described as having a central fountain, pine tree lined arrival avenue, and being contained by white washed boundary walls (O'Donoghue 2011: 19).

In 1882 J H Van Ryn of the Van Ryn Wine and Spirit Company on Upper Strand Street bought three portions, including Ellerslie homestead, and in 1889 consolidated this by adding the upper portion behind the homestead (SG 3419/1899). The purchase of land to develop Ellerslie Girls School came as a consequence of the growth of Sea Point and a need for a public school for girls. Ellerslie estate was bought by the Undenominational Public School Committee of Green Point, transferring in 1900.

In 1901 architect John Parker designed a single storey structure, adjacent to the villa and situated on the same set-back, with sandstone and plaster window surround detail. In 1902 the Ellerslie Green and Sea Point School for Girls was opened for primary school education, with the homestead augmenting the school facilities. The 1903 survey shows that a "bungalow" on the Main Road boundary, with openings in the boundary wall to the bungalow, to the original axial entrance, and on The Glen behind the homestead. These correspond with openings in the existing wall.

During the 1890s period of rapid urbanisation, portions of the neighbouring estate, Bellevue, were subdivided for development, with new access roads, including Ellerslie Road. Row houses and four villas - Heatherbelle, Lyndale, Bellevue Villa and Wynyard - were added to the easterly portion of the study site. This densification and suburbanisation of the immediate area is evident on the 1903 survey.

In 1905 the Parker building was extended with a kindergarten and hall by architect William Black. With the expansion to include a high school, Black designed an upper story to the original Parker building in 1913, integrating old with new and retaining and/or replicating the original detailing (O'Donoghue 2011: 20-22). At this point the pine trees of the avenue were replaced by the wild fig trees still in existence.

In 1935 the homestead was demolished and replaced with a two-storey extension to the school building, sensitively occupying the original homestead footprint and alignment, and finished in sandstone to consolidate it with the school building. The old and new are joined by a recessed portion which acts as the central entrance (O'Donoghue 2011).



Figure 8. 1878 Wilson Map shows the homestead set in formal grounds, with central fountain, and the development of the surrounding street grid. Site outlined red. (CoCT EGSViewer, 2025)

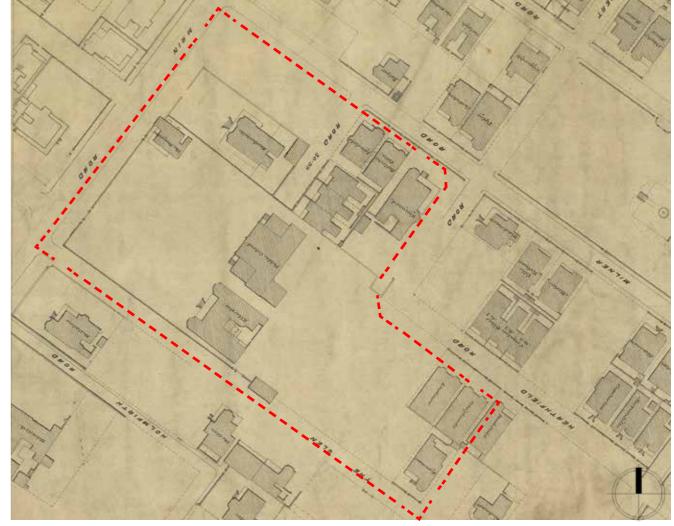


Figure 9. 1903 Plan shows the Ellerslie homestead with the "Public School" adjacent, and the boundary wall along Main Road and The Glen. Other buildings include the "Bungalow", 4 villas and an attached row; Ellerslie road is visible off Milner Road (CoCT EGSViewer, 2025)

The site has been subject to numerous extensions for expansion:

- c1930 roofed bike shed pavilion along The Glen
- 1939 the 1905 hall was extended
- 1952-1954 the additional classrooms extending to the rear (Black & Fagg)
- 1959 alterations to the first floor
- 1964 alterations and additions
- 1970s infill building

In the 1970s the school bought the neighbouring properties with their villas, row houses and Wynyard Mansions. The villas and houses were demolished to make way for sports fields and the swimming pool, while Wynyard Mansions remained standing.

In 1990 Ellerslie School vacated the site and Tafelberg Remedial School took over the facilities until 2010 when it relocated and the buildings have been vacant. Wynyard Mansions remained occupied by social housing tenants until their relocation in 2014, since which time it has been vacant.

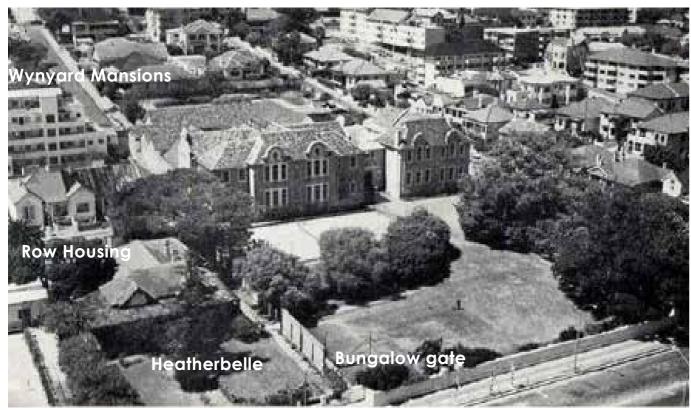
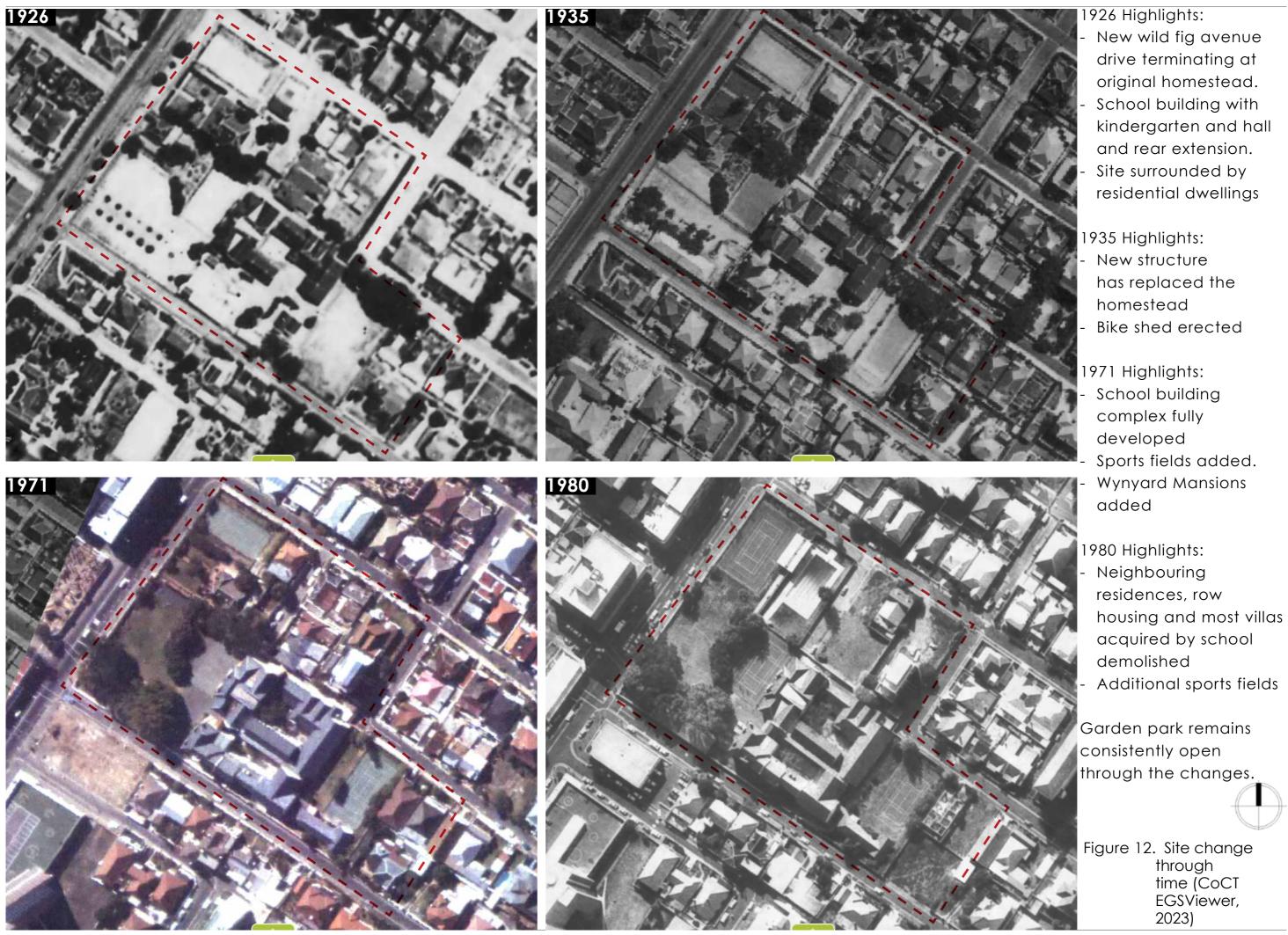


Figure 10. Site post 1955, with Wynyard Mansions set behind the row houses, which are not yet demolished; Heatherbelle Villa in the foreground. The Bungalow has been demolished, but opening in the boundary wall remains. (O'Donoghue, 2011)



Figure 11. c1950 shows the Ellerslie school building complex. The Bungalow has been demolished and new sports grounds introduced. (CoCT, 2023)



4.0. ARCHAEOLOGICAL HERITAGE RESOURCES

4.1. Resources Anticipated

Given the long history of settlement and development on the site, pre-colonial material is not anticipated, and certainly not significant, in situ deposits.

Historical period materials, features and/or structural remains could occur, however, dating to any period of the utilisation of the site, from its origins as a farmstead, up to and beyond its use as a school. It is anticipated that early remains would likely be concentrated near the original location of the farmhouse, and located in features such as middens, wells or other pits; any other material from this earliest period would likely include isolated historical artefacts – glass, bone, metal, ceramics. . As the 1936 school was built on the footprint of the demolished homestead, it is not anticipated that structural remains of the main farmhouse will be encountered.

Finds related to the use of the property as a school are likely to be less concentrated, and occur as scattered, isolated finds across the wider area, related to the movement of children.

Structural features can be expected to correlate with the known locations of buildings as depicted on historic plans and surveys, but it is possible that remains could occur that do not correlate with any known buildings captured to existing plans.

4.2. Resources Identified

Prior to design development progressing, geotechnical testing of the site was necessary to characterise the underlying geological composition of the site. This work provided an opportunity to inspect below ground conditions on a site that is predominantly paved and/or built over.

Five holes were dug across the site, with care taken in siting the holes to avoid the area around the historic homestead which was identified as potentially holding archaeological significance. Holes were hand dug to a depth of 1.5m, and inspected by the archaeologist during excavation, and prior to backfilling.



Figure 13. The location of the test pits (RSA, 2024)

The outcomes of the geotesting revealed no evidence for below ground structures, features, or deposits. Two sherds of C19th/C20th European transfer printed earthenware ceramics were retrieved from excavation of Test Pits 1 and 3 - the two pits closest to the homestead site and to the school building. Test Pit 1 had some slate debris and redbrick rubble in the south eastern corner of the trench, but this did not appear to reflect in situ structural remains. Test Pit 4 revealed a horizontal concrete feature across the western extent of the trench, but this was not considered of any great age or significance.

No further archaeological remains, features or structures have been identified on site, although the possibility of such remains occurring below ground cannot be discounted. This includes possible remnants of the Ellerslie Road surface below current ground level; the fabric of this surface is not known, although it could have been cobbled.



14 Erf 1424, 353 Main Road, Sea Point: AIA Rennie Scurr Adendorff November 2025



Figure 17. Test Pit 4 Figure 18. Test Pit 5

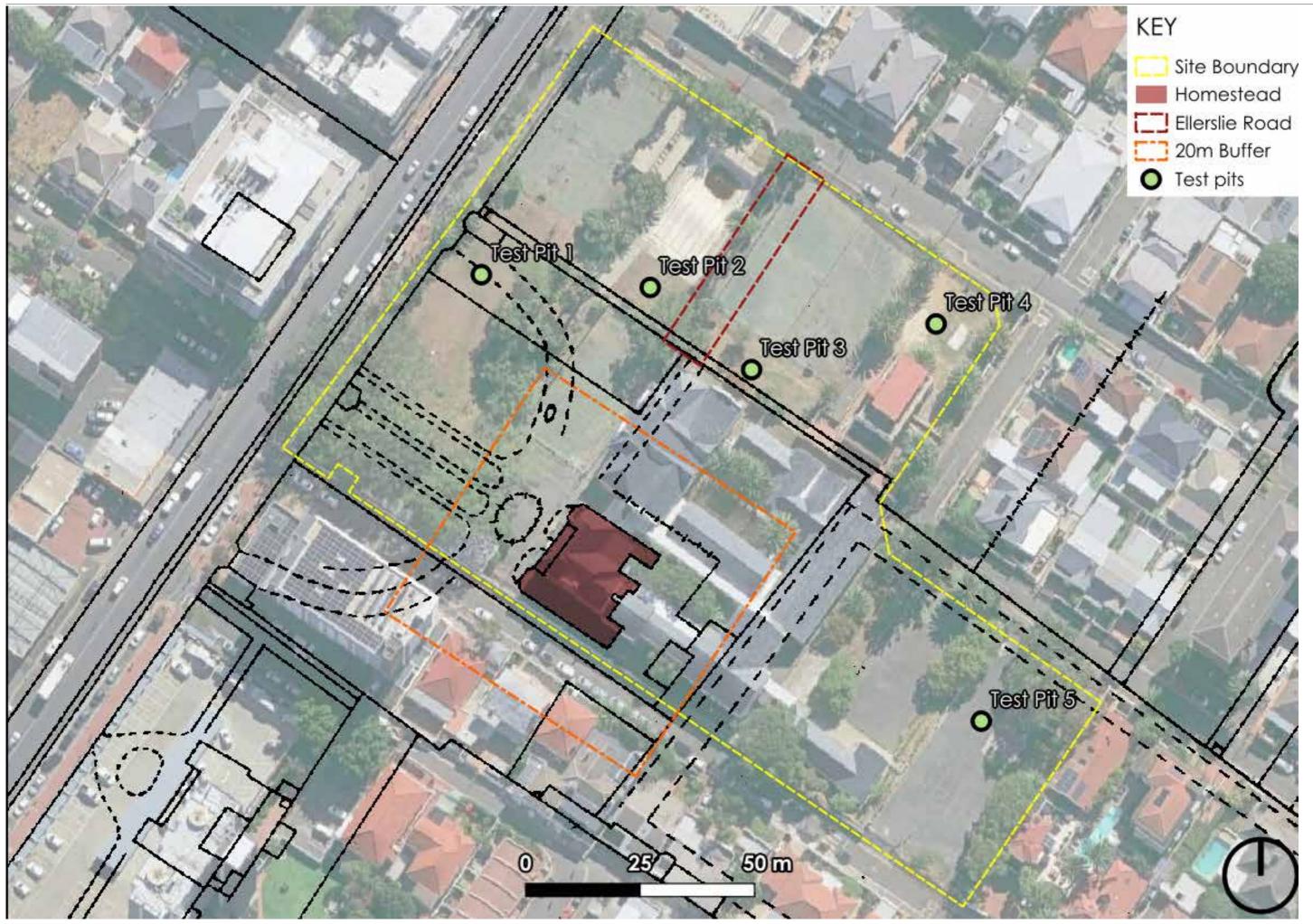


Figure 19. The test pit locations overlain on Snow's 1862 Survey, showing their siting relative to the historic core of the school and various landscaping features (RSA, 2024)

4.3. Archaeological resources and grading

The site complex on erf 1424 is a Provincial Heritage Site (PHS) by virtue of its 1989 declaration as a National Monument and is formally protected in terms of Section 27 of the NHRA, and HWC has confirmed that this protection extends to the entire site.

The significance of any archaeological resources identified on this site would be determined by their age, history and association, as well as their intactness, condition, and the circumstances of their provenance; accidental vs isolated finds vs securely provenanced material from stratified deposits.

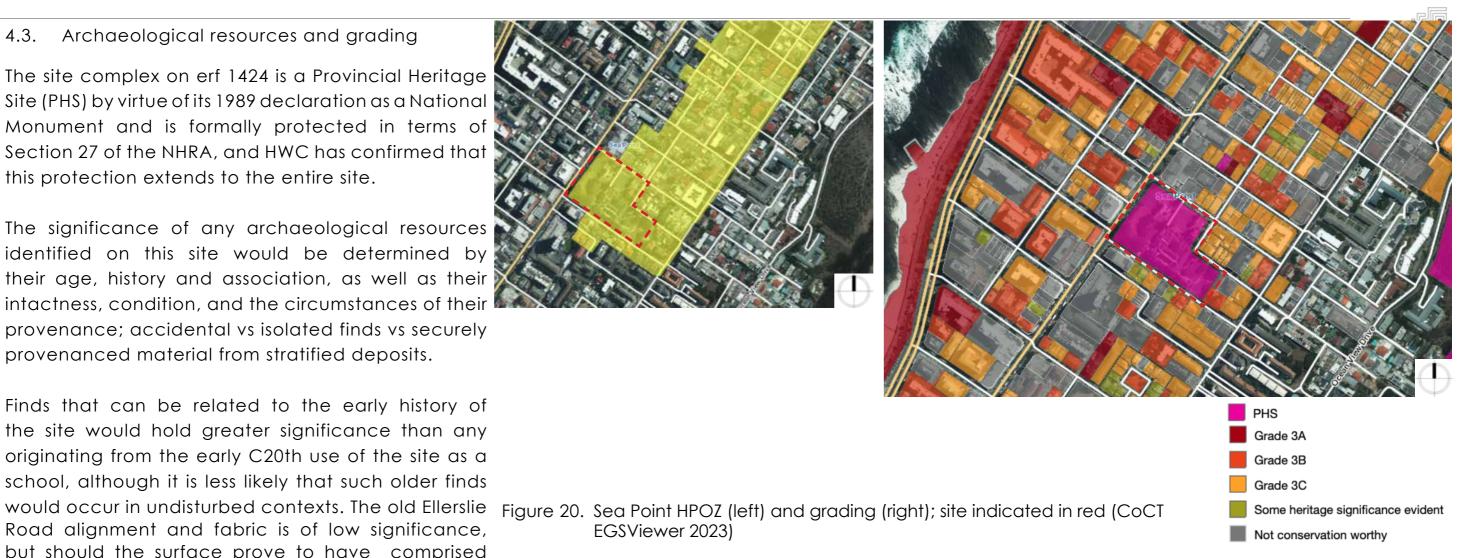
Finds that can be related to the early history of the site would hold greater significance than any originating from the early C20th use of the site as a school, although it is less likely that such older finds Road alignment and fabric is of low significance, but should the surface prove to have comprised cobbles, these could hold some value.

4.4. Grading

Prior work has proposed regrading the site as a whole Grade IIIA. The grading of any archaeological material identified within this site cannot be determined in advance, but is unlikely to hold higher significance than Grade IIIC.

Statement of Significance

Archaeological material related to the early history of the site as a farmstead could yield important information about life on these estates at the time. Remains associated with the history of the site as a school could potentially shed light on aspects of school life that would hold associational and symbolic significance that link to the memory value of Ellerslie School.



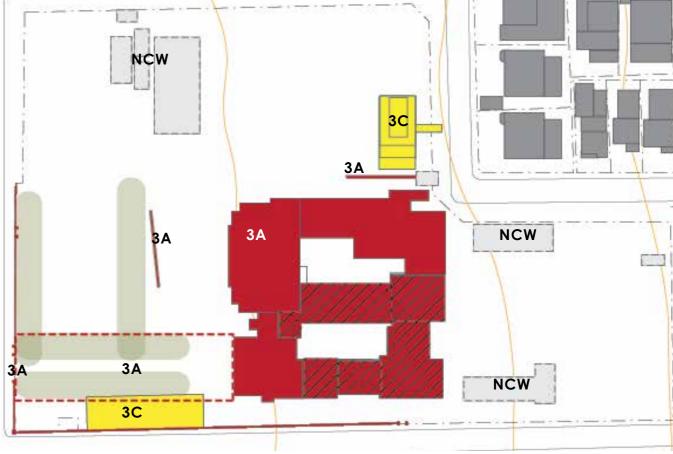


Figure 21. Provisional grading of component parts of the site (RSA 2023)

5.0. ARCHAEOLOGICAL INDICATORS

The most archaeologically sensitive portion of site is the area closest to the site of the historic homestead, now occupied by the 1935 extension to the school building.

Any development, earthmoving or excavation in proximity to this area should be undertaken under monitoring by an archaeologist to ensure that, should any

archaeological material, structures or features be encountered, these can be appropriately mitigated. The archaeologist should be on site for any development within 10m of the historic homestead, while occasional monitoring would be sufficient for any development outside of this zone up to 20m from the homestead.

Mitigation of any material encountered in proximity to the homestead might include recording prior to destruction, or could extend to excavation. This would be determined by the nature, condition, and significance of the material identified.

Should the old Ellerslie Road alignment survive, and prove to have been cobbled, retention and reuse of these cobbles should be considered.

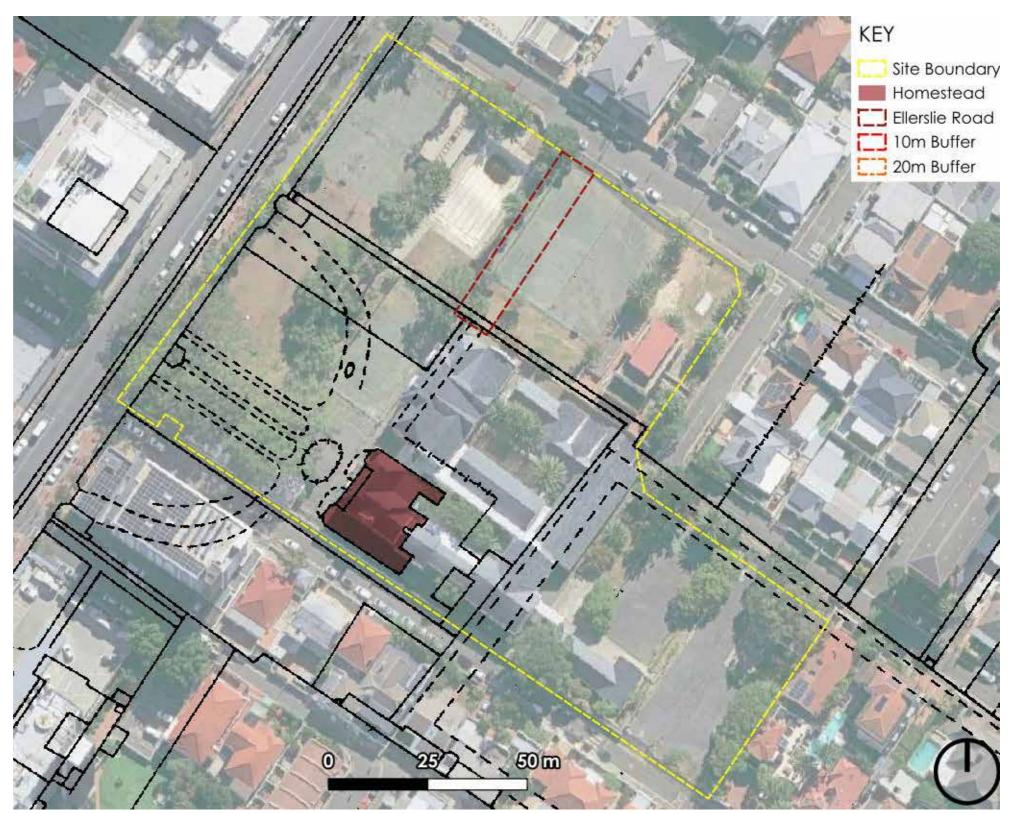


Figure 22. 10 and 20m buffer zones respecting the historic homestead site within the school complex (RSA, 2025)

6.0. PROPOSED INTERVENTIONS

While the Western Cape Department of Social Development (DSD) is considering using the portion of site housing the old Ellerslie school building for purposes aligned with its mandate, the Department of Infrastructure is proposing redevelopment of the remainder of the site, with a part of that redevelopment including affordable housing.

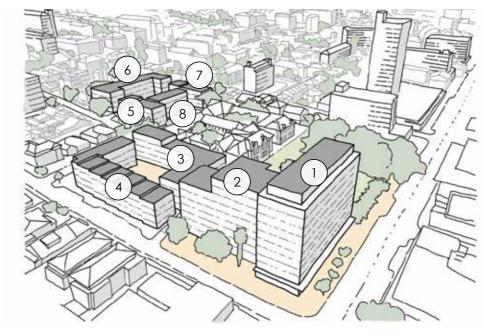
Scoping exercises have identified a preferred option for redevelopment, Option 3, as providing the most beneficial mix of market-related properties and affordable housing options, although the exact configuration of these

LEGEND Study Area Site of Development Building footprint Vehicular access: At grade

Figure 23. Proposed site plan and perspective drawing of Option 3 (Zutari, 2025)

typologies has not yet been determined. Bulk, massing and layout have all been informed by heritage indicators during iterative consultation processes that have taken place not only within and between the design team, but also included extensive preliminary public consultation.

The proposal sees the subdivision of the site into three new erven, two of which are to be developed, while the third comprises the school building and its front garden. This erf is excluded from all options considered, and, therefore this AIA does not present the development alternatives, but rather focusses on the preferred option.



Building footprint	Number of floors	Nett building Area (sqm)
1	11	5 150
2	4-9	3 505
3	4	2 240
4	4	2 120
5	4	840
6	4	2 080
7	4	880
8	4	800
Total Resid	17 615	
Retail GLA (Footprint 1 only)		1 200

6.1. Likely Impacts to Archaeological Heritage

While below ground interventions could yield archaeological finds anywhere across the property, as already identified, it is the immediate vicinity of the old homestead that is of highest archaeological sensitivity. As this entire area is excluded from development, archaeological impacts are limited.

Should remnant fabric from the historic alignment of Ellerslie Road remain on site, this would be destroyed by development in this area.

6.2. Mitigation

Inspection of foundation trenches should be undertaken when these are first opened during construction phase. Monitoring of initial works in the area of the old Ellerslie alignment should also be undertaken to inspect for the presence of buried historic fabric.

No ongoing monitoring is necessary of foundation trenches or work along the road alignment should no archaeological material be present.

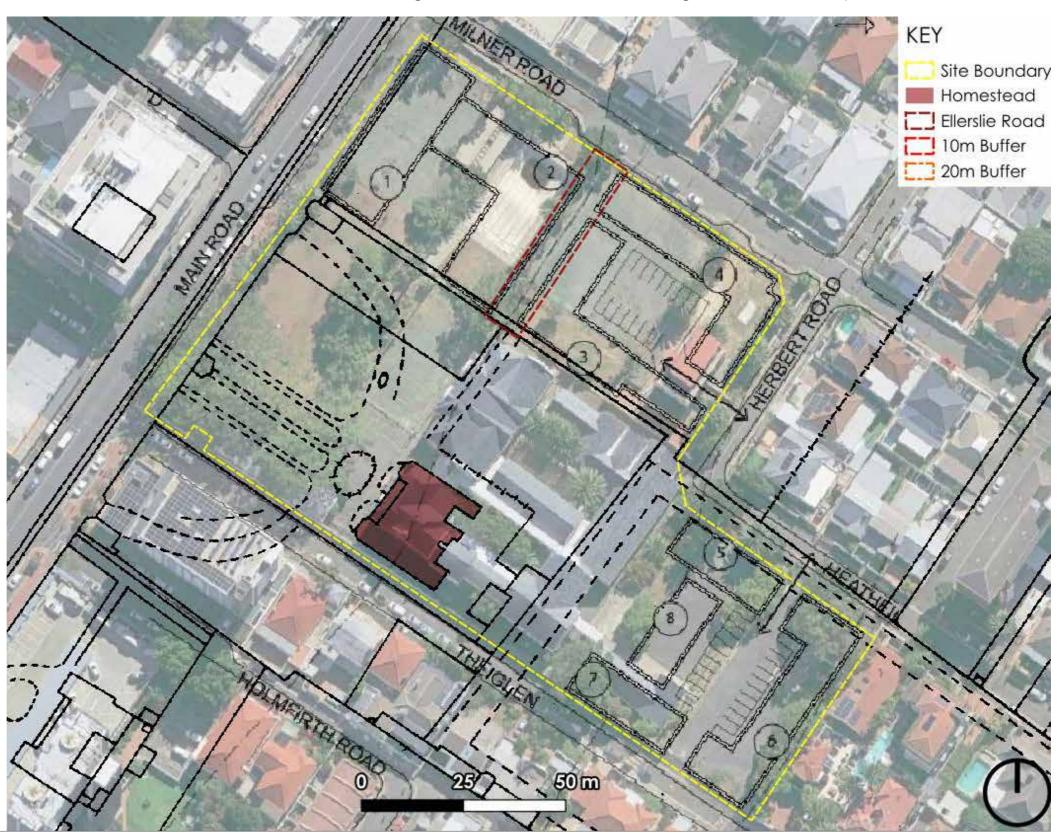


Figure 24. SDP and subdivision plan overlaid on archaeological sensitivity mapping (RSA, 2025)

7.0. CONCLUSIONS AND RECOMMENDATIONS

The proposed development will see the transformation of the site, which is likely to have impacts to any below ground archaeological material, structures or features that might persist. However, the school building, and therefore the old homestead site which underlies it, is excluded from the proposed development

Initial below ground exploration, achieved through the test trenches opened up for geotesting yielded almost no archaeological material, and none of any significance. While this does not preclude the presence of further, as yet undiscovered material being located elsewhere on site, it is likely that such material will be in the form of low density, isolated scatters.

Given the exclusion of the homestead site, and the absence of any significant archaeological material revealed during geotesting, it is not anticipated that significant, in situ deposits or materials will be impacted. Remnant historic road fabric could survive along the Ellerslie Road alignment, and if these are cobbles, they should be retained for reuse elsewhere on site.

Generally, significant archaeological impacts are not likely to arise as a result of this proposed development. While the proposed subdivision poses no risk of archaeological impacts, any future redevelopment of the DSD portion will need to undergo a separate process in terms of NEMA to consider likely archaeological triggers.

It is recommended that:

- This AIA be endorsed:
- Initial inspection of foundation trenches be undertaken when these are opened during construction phase.
- Initial monitoring of works in the area of the old Ellerslie Road alignment should be conducted, and if cobbles are located there, these should be retained and reused elsewhere on site.
- Any future redevelopment of the DSD portion will need to follow relevant archaeological processes.
- If any human remains or significant archaeological materials are encountered during construction work all work in that area should be halted, and the area cordoned off until HWC has been notified, and an appropriate course of action can be determined. This may include mitigation through excavation.

No PIA is recommended, but a fossil finds protocol should be provided..

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LIST OF FIGURES

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ANNEXURES

Annexure A: HWC RNID, 27 February 2024

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Our Ref: HM / CAPE TOWN METROPOLITAN / SEA POINT / ERF 1424

Case No.: HWC24020910SJ0209 Enquiries: Sneha Jhupsee

E-mail: Sneha.jhupsee@westerncape.gov.za

Tel: 021 829 3318

Mike Scurr | mike@archrsa.com



RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP: HIA REQUIRED

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape
Provincial Gazette 6061, Notice 298 of 2003

NOTIFICATION OF INTENT TO DEVELOP: PROPOSED DEVELOPMENT OF ERF 1424, TAFELBERG SCHOOL, 353 MAIN ROAD, SEA POINT, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999).

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers' Meeting (HOMs) held on 26 February 2024.

You are hereby notified that, since there is reason to believe that any <u>proposed development of Erf 1424, Tafelberg School, 353 Main Road, Sea Point,</u> will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted.

Section 38(3) of the NHRA provides:

- (3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): **Provided that the following must be included:**
 - (a) The identification and mapping of all heritage resources in the area affected;
 - (b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;
 - (c) an assessment of the impact of the development on such heritage resources;
 - (d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
 - (e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;
 - (f) if heritage resources will be adversely affected by the proposed development,
 - The consideration of alternatives; and
 - (g) plans for mitigation of any adverse effects during and after the completion of the proposed development.

(Our emphasis)

This HIA must in addition have specific reference to the following:

- Architectural Analysis
- Desktop Archaelogical Impact Assessment
- Townscape Study
- Socio-historical Study
- Visual Impact Assessment
- Extensive Public Participation with the public and broader community

The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above.

The required HIA must have an integrated set of recommendations.

The comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied.

PAGE 2 OF 2 Our Ref:

: HM / CAPE TOWN METROPOLITAN / SEA POINT / ERF 1424

Case No.: HWC24020910SJ0209
Enquiries: Sneha Jhupsee

E-mail: Sneha.jhupsee@westerncape.gov.za

Tel: 021 829 3318



If applicable, applicants are strongly advised to review and adhere to the time limits contained the Standard Operational Procedure (SOP) between DEADP and HWC. The SOP can be found using the following link http://www.hwc.org.za/node/293

Kindly take note of the HWC meeting dates and associated agenda closure date in order to ensure that comments are provided within as Reasonable time and that these times are factored into the project timeframes.

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

Waseefa Dhansay
Assistant Director: Professional Services



27 February 2024

www.westerncape.gov.za/cas

Street Address: Protein Assurance Building: Green Market Square, Cape Town, 8000 • Postal Address: P.O. Box 1685, Cape Town, 8000 • Tel: •27 (0)21 483 5959 • E-mail: ceobin Hage@westerncape.gov.za

Streatadres: Protes Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • Posadres: Posbus 1665, Kaapstad, 8000 • Tel: • 27 (0)21 483 5858 • E-post cebher/lage@westerncape.gov za

Idilesi yendawo: kumgangatho 3, kwasakhiwo iprotes Assurance, Greenmarket Square, ekapa, 8000 • Idilesi yeposi: Inombalo yebhakis yeposi 1665, eKapa, 8000 • Ilnombolo zomnxeba: •27 (0)21 483 5959 • Idilesi ye-imeyile: cechentage@westerncape.gov.za

www.westerncape.gov.za/cas

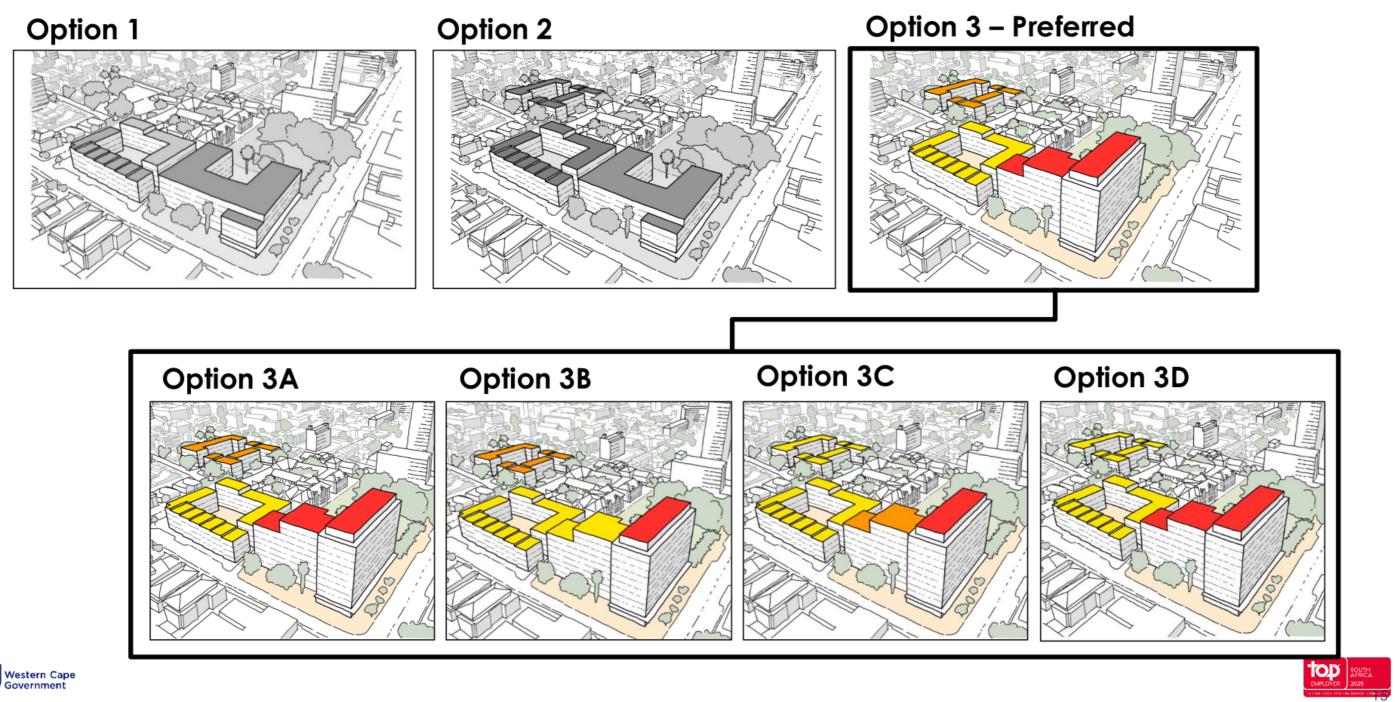
Street Address: Protea Assurance Building: Green Market Square, Cape Town, 8000 • Postal Address: P.O. Box 9665. Cape Town, 8000 • Tek: •27 (0)21 483 5959 • E-mail: ceolie:itage@westerncape.gov.za

Straatadres: Protes Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • Posadres: Posbos 1665, Kaapstad, 8000 • Tel: +27 (0)21 483 5859 • E-pos: cepherilage@westarncape.gov.za

Idilesi yendawo: kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, ekapa, 3000 • Idilesi yeposi; Inombolo zomnxeba; +27 (0)21 483 5959 • Idilesi ye-imeyile; cechempge@westerncape.gov.za

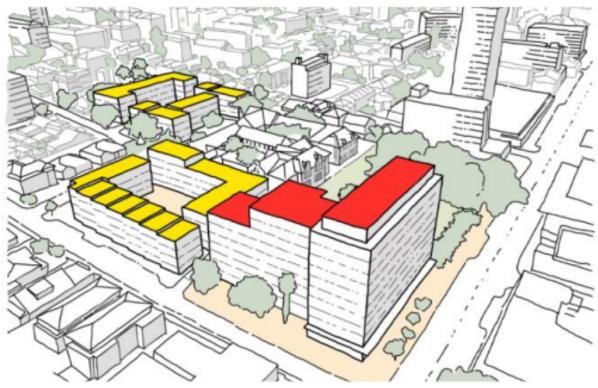


Design Concept - Preferred Option (Option 3 Refined - new)



Design Option 3D

(additional social housing – less open market)

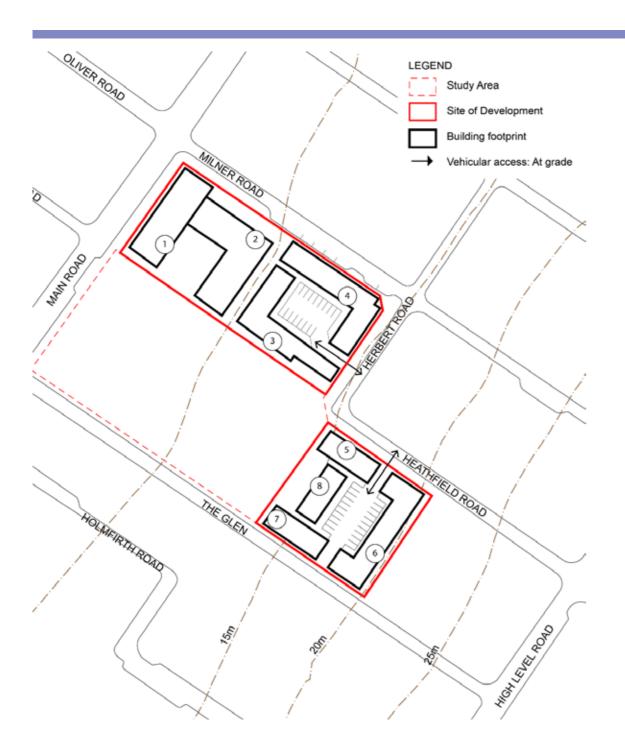


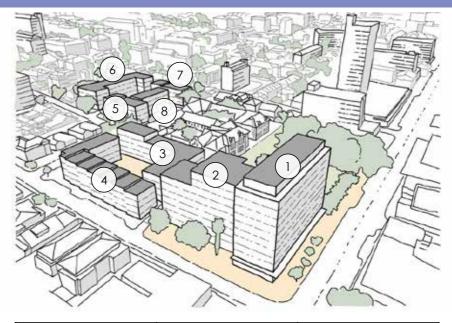
1200m² 17,615m²

Open Market	Social Housing
8655	8960
64	22
100	134
50	89
15	7
229	252
49,1%	50,9%

481

Design Concepts: Option 3 Building heights and areas





Building footprint	Number of floors	Nett building Area (sqm)
1	11	5 150
2	4-9	3 505
3	4	2 240
4	4	2 120
5	4	840
6	4	2 080
7	4	880
8	4	800
Total Resid	17 615	
Retail GLA (Footprint 1 only)		1 200

4

