

14 June 2017

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cc *emeritus* Prof Walter Peters

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Comment on Draft Heritage Impact Assessment Report, May 2017, regarding a proposed development, Werdmuller Centre, Erf 54472 Cape Town.
HWC Reference: 15022403

Dear Cindy and Walter

We thank you for submitting the revised report for our comment. We hereby submit our comments:

1. We believe that the current proposal would adversely affect the heritage significance of the Werdmuller Centre, a building with a Grade 2 heritage significance that has been motivated and endorsed by the Heritage Western Cape (HWC) grading committee, despite an appeal by the current owner. Our nomination submission dated 22 October 2015 as well as all our previous comments are attached for reference. All of these comments remain relevant, and must be considered in conjunction with this letter.
2. The Heritage Impact Assessment (HIA) makes the statement: *“An assessment of the impacts of the proposals upon the heritage resource finds that they do not adversely impact heritage significance”*. This statement cannot be true: by demolishing the majority of the building, by stripping out and replacing almost all external facades, by enclosing all external circulation and by covering the off-shutter concrete with another material, it would be factually more accurate to say: *“This design proposes the removal of large portions of the fabric of the building, changing the material character and removing almost all significant architectural elements. It then proposes a building of overwhelming scale and conventional architectural resolution in response to the client’s targets for leasable floor area, which provide new functions to the building but have little resonance to the original building or its design intentions.”* The significance of the building will be lost, which stands in obvious contrast to its Grade 2 status. The statement that the impacts on the heritage resource do *“not adversely impact heritage significance”* is not supported by fact and is in stark contrast with the principle that heritage practitioners should *“be accountable principally to the cultural environment, not only to clients and the public”* (APHP code of conduct).
3. Docomomo-SA’s objection against the development proposals and the assessment of their impacts will address firstly the extent of demolition and secondly the design proposals themselves.

The proposed extent of demolition:

4. Docomomo SA strongly contests the extent of the proposed demolitions which involves the complete demolition of a substantial part of the heritage resource, and detrimental partial and smaller scale demolitions of the remainder. These proposed demolitions are a consequence of the heritage indicators in the previous HIAs (September 2015 to July 2016) that pre-suppose particular avenue of development (a multi-story tower on LHC1) as well as the reconfiguration of the LHC2 floor plates which will change this area irreversibly.
5. The extent of demolitions and partial demolitions to LHC2 is contested, as this will strip this area of its tectonic qualities. The report motivates the transfer of permissible bulk from LHC2 to LHC1 in order to conserve LHC2, however this is not the end result as the proposed demolitions to LHC2 include extensive demolition of the elegant curvilinear shopfronts and staircases, retaining the peripheral enclosures.

6. The demolition of the external walls and shopfronts onto the first floor circulation route of LHC2 is unacceptable since they form the spatial boundaries of this significant moment of the architecture. There is agreement that this space is of great architectural significance, and to remove its external enclosures is simply unacceptable and in contradiction with its Grade 2 status. On LHC2 it is stated that all external walls are to be retained, yet the drawings show almost all external walls to be demolished and some other change location. All circulation in this building is outdoors and for this reason the facades facing onto outdoor areas are external. As it stands the statements in the text versus the drawings and their annotations are contradictory: this must be addressed in the final HIA.
7. It is noted that across the site the heritage value lies in the in the spatial character of the complex and not the elevations – in the proposal, the elevations are what is being kept. The spatial sequences of the building are incredibly rich and layered, relying on one another for full effect.
8. The demolition proposal is consistent with the original application for split grading for LHC2 and LHC1 which was rejected by Heritage Western Cape IGIC in favour of a single Grade 2 rating for the site. It follows that the building cannot be seen as two parts with a greater and lesser significance and that the proposal of the demolition of LHC1 on the basis of a “lesser value” must be rejected.
9. Much of the demolition of the building is motivated by criticism of the floorplates which assumes that tenants of the offices, apartments and retail spaces will only accept conventional spaces aimed at an upper income bracket. This is an assumption of the developers which is of devastating consequence to the building. If the developers choose to have less conventional space, of smaller subdivisions, catering for the public surrounding the building, much of the demolition would not be necessary. The developers’ assumptions about his target market cannot be grounds for demolition if viable alternatives exist.
10. The proposed demolition extent included in the indicators are informed by the developers’ brief (the so-called ‘non-negotiable four key points”) and pre-empt a specific design proposal rather responding to design indicators generated from the inherent architectural value of the Werdmuller Centre. It is acknowledged that managing conservation of the building through a new sustainable use may have to involve demolitions but the need for demolitions must be evaluated against the merits of a design proposal in response to heritage indicators, and cannot be the starting point of a design proposal.
11. The structural engineers’ report lists: “2. *The following design parameters are provided by the Town Planner, Architects and Heritage Specialist* (our underlining)”. From the list of constraints, it is clear that the heritage specialist did not mention the Grade 2 heritage resource decision based on architectural excellence. This fact must be included in this report and the engineers must consider their comments on the structure and the structural implications of the proposed demolitions in light of this fact.
12. The structural report comments on the effects of the proposed brief on the existing structure; the opposite should have been done: to report on the structural implications of retaining all areas of declared heritage significance and the structural options available to manage further development. The fact that any building, considered to be of architectural excellence, cannot carry an enormous new building on top of it, is not a shortcoming of such building, it is a constraint of the heritage resource that the owners have to acknowledge, and the project team have to address in their proposals.
13. The structural engineers should indicate on drawings the full consequences of demolition necessitated by the architects’ proposals, because the structural implications of proposed demolitions are often more extensive than anticipated by the architects (previous studies on the Werdmuller have made this very clear). At a later stage when the full structural implications of an architectural proposal are resolved, these structural changes to the design previously submitted as part of the HIA are often regarded as “necessary”. Such structural “necessities” are presented as a *fait accompli* when developing the technical drawings which is always after the HIA process, and at a time when there is no further interaction with Interested & Affected Parties (I&APs). This has the effect that serious demolitions are not submitted as an impact on the heritage resource during the HIA process and leaves I&AP’s unable to comment on them. Therefore, the structural engineers’ report must be rejected because it is a report on the structural needs of a new design and is not a structural report listing heritage impacts on a heritage resource.
14. The comments in the structural report regarding the proposed design on LHC1 are so vague that no reader can work out where and how often these impacts would occur. The structural report must be revised to be clear and complete with regard to all heritage impacts on the existing building. The location and configuration of all thickened slabs, fattened concrete columns, new columns, bracing of columns, new beams of any sort, shear walls and demolition lines should be shown. The failure to mention a specific structural impact

on the heritage resource should be sufficient grounds for not permitting such an impact from occurring in future.

15. In the design indicators it is stated that for LHC2 “the highly articulated roofscape is to be retained and respected, and should any inner volumetric exploration be warranted other than those existing, these would require motivation”. However the demolition plans include a number of demolitions that must be managed:
 - 15.1 The demolition of the curvilinear walls on the roofs of LHC 2 (indicated on the demolition plans - Second Floor and Roof Plan) should not be allowed. They are a substantial part of the architectural language. The loss of these wall will leave only the rectilinear forms of LHC 2, as seen from the station, when the original architecture was a mixture of rectilinear and curvilinear forms. These curvilinear walls are significant reference to the Le Corbusian language which often had curvilinear walls on the roof. There is also no compelling reason to remove these walls. These walls concealed A/C units on the roof and can continue to serve this purpose.
 - 15.2 The demolition of the rectangular roof slab with curvilinear wall element above to LHC2 indicated in the demolition plan roof layout must be not be permitted. It is noted that the report refers to a 3rd floor roof support that is being braced and at risk of collapse. It is not clear which roof area is affected by this support, however it follows that this support may be demolished on the condition that it is reconstructed. The reconstruction of this support must not be construed as leave to reconfigure the roof.
 - 15.3 The toilets on the roof plan of LHC2 may be demolished, but the external envelope should be retained as is. The protruding cubic form is part of a series of such protruding forms, of various heights. The loss of this form would take away from the architecture without any compensatory enhancement.

Impact of the development proposal on the Grade 2 heritage significance of the building:

16. The proposed demolition followed by either one of the tower proposals would negatively affect the remainder of the heritage resource by their overwhelming scale and the conventional architectural language of the proposed towers, and the proposed interventions in the retained rear section of the existing building, effectively erasing important aspects of the original architectural merit and design intent.
17. The proposed designs both comprise a very big, very tall single mass on top of a building of outstanding architectural significance. We contest the design approach stating that “the new building has been deliberately downplayed and neutrally sheathed throughout”. We are not convinced that the premise of this design approach emerged from a thoughtful engagement with the building and an acknowledgement of the building as a Grade 2 heritage site based on its architectural excellence. Rather the proposed neutrality of the proposal indicates an approach that is generic and conventional for any commercial high rise development. The overpowering presence of an indifferent building on top of an architecturally excellent building will without doubt compromise the heritage resource severely. This impact is so negative that this particular proposal should be rejected in its entirety. A more skillful piece of architecture could mitigate this concern.
18. From the drawings provided, both the residential tower and the residential/office tower proposals appear to have the quality of a solid extrusion, which is in direct contrast to the highly articulated and permeable design of the Werdmuller Centre. For both options there appears to be a lack of definition between existing and new building areas. Of the two options, design Option B with its 5 levels of parking above the roof, large staggered compositional volumes of office and residential space is such a poor design and unsympathetic proposal that no further development of this scheme would be acceptable.
19. We note that the developers are proposing a building of approximately 60 meters high, when the current permissible height for the zoning applicable is only 25 meters, thereby acquiring development parameters of 2 subzones higher than the present General Business 5 zoning. This decision in itself has a major impact on the heritage resource. The proposed 60 meter tall building will through its scale overwhelm the Werdmuller Centre as well as the Claremont CBD and will reduce the Werdmuller to a podium of a new tower development. For an architecturally significant building to become a secondary component of a major development is an unacceptable impact on the heritage resource. We would propose that any proposal exceeding the 25 meter height limit should demonstrate exceptional architectural skill and a highly desirable public function in order to be considered in this context.
20. In both proposal A and B the extent of the 3 to 5 parking levels above the building contribute substantially to the height of the proposed building (which is a negative impact), and the associated structural grid imposed on the retail floors below and the floors above contribute to the unrelenting character and bulk of the tower proposals. The large mass, in width and in height, of the visible parking structure is in sharp contrast to the finely articulated forms of the Werdmuller Centre. The visible parking levels above the existing LHC1 roof

level should not be allowed; the development should be constrained by the provision of basement parking only.

21. The vehicular ramp associated with the upper parking levels has a scale that dominates the curvilinear form of the existing building below it. It competes with the double curved transverse wall that is a significant architectural element of the Werdmuller Centre.
22. It is noted that for this buildings' zoning there is a zero on-site parking requirement, specifically aimed to reduce car dependencies where alternative transport options are available, to promote densification and ground level planes focused on pedestrians. The proposed new building aligns itself with the projected needs of upmarket customers and motor vehicle owners, rather than the retail, residential and office needs of the pedestrians and commuters who are using the main pedestrian thoroughfares and trains, busses and taxis (approx. 7000 pedestrians/ commuters making more than 14000 public transport trips per day equaling approximately 4.5 to 5 million people walking past the site per year). The Werdmuller Centre is surrounded with precedent that proves that parking is not a prerequisite for commercial success: the McDonalds on the same block and the KFC and Shoprite across Newry Street are extremely successful and have no on-site parking.
23. The developer claims that an anchor tenant or anchor tenants are a requirement for commercial success. This is a false assumption that may be valid for suburban shopping malls, but not necessarily true for retail in very busy pedestrian environments. In busy pedestrian environments retail can do very well by trading to passersby only. This is clear for many, many examples of trading next to train stations, taxi/bus stops or main roads. Space for a large anchor tenant demands a large flat floor plate which in turn "necessitates" demolition of the existing building. It is a choice of the developer in the face of alternatives with much lesser impact on the heritage resource, namely smaller scale retail areas. Per square meter, small scale tenancies along busy thoroughfares can yield as much as large scale retail, for example the Watershed in the Waterfront. For this reason we argue that the choice of an anchor tenant cannot be used as a motivation for demolition.
24. It is a highly significant part of the experimental typology and the original design team's response to the socio-political context of the time that the building aimed to cater for a range of economic and social opportunities. We highlight here that HWC IGIC in their clarification of the basis of the grade 2 significance of the Werdmuller Centre includes that the significance relies on the design intentions of the project. The permeability of the Werdmuller Centre and its provision of open and accessible trading space and linkages to the public urban realm is a significant aspect of the heritage significance. This aspect is undermined by the current proposal in the following ways:
 - 23.1 The current proposal negates this aspect by removing informal traders off site to the adjacent bus interchange and envisioning exclusionary spaces of leisure (gym), macro economic trade, upper end residential and office spaces. The closing off of the existing open access through the building is also a removal of the historic urban connections prior to its boarding up.
 - 23.2 The proposal also realigns the lower ground floor circulation in LHC2, which is an outdoor public route stretching from Newry Street on the north to the Claremont Boulevard on the East. The owners have criticized the circulation of the Werdmuller for being illegible and not following desire lines, however this route follows the natural path of pedestrians from Main Road, down Newry Street to the train station. The re-writing of this significant aspect of the Werdmuller Centre's heritage must not be permitted: its configuration must be respected, the shopfronts should remain in their existing positions and if needed restored to their original condition.
 - 23.3 The proposal removes the Werdmuller Centre from the Main Road and internalizes the circulation. This proposal is in conflict with its Grade 2 status: a building cannot be deemed to be architecturally excellent by HWC and then be allowed to remove all traces of it to a primary road aspect. The proposal as it pertains to the Main Road treatment should be rejected. Instead the entrance from Main Road with its splayed wall, the circular window facing Main Road, the triangular concrete canopy and the beginnings of a public route into or through the building must be retained.
 - 23.4 By enclosing the covered walkway behind the screen on corner of Main Road and Newry Street the entrance to the Newry Street colonnade is severely compromised and pinched – this should not be allowed.
25. It is common cause that the space between LHC1 and LHC2 is a truly brilliant piece of architecture and one of the highlights of the Werdmuller Center. For this reason no partition (glass or otherwise) that divides this space can be accepted. If weather proofing is to be improved then it should be done without partitioning the space and allowing the space to remain an outdoor space. It is proposed that the design for glazing or weatherproofing of this space seek a solution that locates the enclosure above or outside the existing space rather than situating it midway the portico.

26. Similarly the boundaries of the interstitial space should not be reconfigured as per the current proposals, particularly not any boundaries where people can walk next to the building, at whichever level. We object to the proposed reconfiguration of the LHC2 floor areas to consolidate the floor areas into single tenancies per floor and to absorb external covered spaces into internal space, as this will compromise the architectural quality of LHC2. This quality is reliant on the complementary relationships and tectonics of the structural grid and service cores offset by the curvilinear shopfronts, meandering thoroughfares and free-standing staircases. It requested that HWC includes as a condition of the renovation of this area that the visual links through to the interstitial space, as well as the thoroughfares not be blocked with obscure or irreversible internal fit-outs. Similarly the proposed extension of the floor plate of the upper ground floor of LHC2 must not be permitted.
27. The proposal for consolidating the LHC2 roof level floors with a single rectilinear roof and shopfronts as indicated in the 3D drawings must not be permitted as it is detrimental to a significant aspect of the modernist expression of the Werdmuller Centre.
28. Similarly the proposed new deck of the existing outside garden area with its terracotta floors and curved garden edges must not be allowed; instead the existing roof garden should be restored.
29. It is noted here that the assumption that existing fire escapes must be demolished because they do not comply with contemporary fire regulation is incorrect. The fact that a stair exists in a recognized heritage resource is grounds for accepting a non-compliant stair as a functional part of a regional fire plan. Fire stairs are removed in the proposed design to make space for additional rentable space. If a stair must be removed for reasons of fire non-compliance, then this case must be argued by a competent fire engineer. The sculptural character of the stairs and the way they are used to pivot space around them is a central characteristic of the design of the Werdmuller Centre. The proposed demolition of any stair is a major heritage impact and must be motivated by a competent expert; an architect's speculations about the matter is not sufficient considering the gravity of the heritage impact.

The impact of the proposed renovations of the retained building areas and finishes:

30. Our concerns regarding the proposed renovations go hand in hand with concerns regarding the proposed extent of demolition, especially with regards to LHC2. It is an important aspect of architectural language of the Werdmuller Centre that the chrome shopfronts be retained and made good, and that the existing aluminium window frames to upper levels be retained. The statements that most of the original doors and shopfronts are missing are deeply concerning since they were in place when the building changed ownership. The absence of these elements cannot be used as a mitigating factor in the owners' obligation to restore them to their original condition.
31. The existing chrome plated doors were designed with care and are part of the character of the Werdmuller Centre. The HIA is vague about which of the doors will be retained and where doors may be relocated. An HIA should be precise about which ones are to be removed and where. The rest should be restored to their original condition.
32. The statement with regard to shopfronts that "technological advances in aluminium glazing systems have overtaken timber as an appropriate glazing support material" is deemed to be an irrelevant motivation for not restoring the shopfronts to their original condition. If this were a plausible argument, all Cape Vernacular buildings could get aluminium windows. The original timber and chrome glazing support system is integral to the character of the glazed areas and should be restored in keeping with the Grade 2 status. This principle should be applied to all external glazing which is retained in its original position. In limited areas this could be applied to areas of minor adjustment of original glazing areas.
33. The HIA gives no information on the nature and design of new shopfront systems used for new work. The character of new shopfronts could have an impact on the heritage resource itself. The final version should indicate this and the I&APs should have opportunity to comment.
34. The HIA does not give any clarification of the nature and specification of the glass that is to be used in restoration of shopfronts. This must be included in the HIA since the design of the glazing can have a compounding impact on the heritage resource and its inclusion is common practice in HIA's on Modern Architecture, especially since energy performance criteria like SANS 0400 XA make demands on the nature of new glass panels and their thermal performance. The glass type(s) must be declared in the HIA. All restoration work to existing shopfronts and external glazed areas must be clear glass. The HIA must also clarify the proposed restoration work to areas of glass blocks.

35. The restoration and proposed concrete repair of the building is inappropriate and we believe other more careful methods of repair should be investigated. The proposed method of applying cementitious slurries or plasters on the off-shutter concrete is a highly undesirable method of concrete restoration. This method was used at the UCT Sport Centre and at 9 Dorp Street and in both cases have permanently changed the appearance of the buildings. To be more precise, cementitious slurries or plasters form a layer (2-5mm thick usually) over the off-shutter concrete. Such a layer is applied with a block brush usually or sometimes with a steel trowel. As a consequence, all formwork marks are erased. The solid off-shutter concrete finish is replaced with an applied finish that either looks like grey lime wash (when applied with a block brush) or like plaster (when applied with a trowel). It never looks like the original off-shutter concrete. The change of appearance of the concrete is substantial and is therefore not an acceptable alteration to the material quality of the building. To make matters worse, these cementitious coatings do not adhere to smooth, off-shutter concrete. For this reason the original off-shutter finish must be destroyed by severe scrubbing in order to roughen the surface sufficiently for the products to adhere. Often there are adherence problems and the coatings crack and flake off, as can be seen already in one of the test samples submitted in the present proposals. The permanent destruction of the off-shutter finish is not reversible and is therefore not an acceptable alteration to the material quality of the building. The last reason for rejecting the proposed covering of the off-shutter concrete is the fact that non destructive, invisible alternatives exist which retains the massive off-shutter appearance and effectively renews and restores the concrete. The application of silane-based sealants (made by the same manufacturers of the cementitious coatings) after a light water jet cleaning process makes for concrete which retains its original material qualities, but with improved moisture impermeability and improved carbonation and chlorination protection. This method is used globally in the restoration of brutalist architecture. Given the grade 2 status of the Werdmuller Centre, it is essential that the architects engage with best practice in Modernist conservation principles for material repair and existing finishes.
36. It is also requested that the extent and location of the removal, renovation and/or replacement of the following finishes are clarified in the HIA and opportunity given for comment:
- 35.1 Textured aggregate panels, including the proposed fixing methods.
 - 35.2 Stippled plaster extent.
 - 35.3 Stone floor cladding: the HIA does not commit itself to a replacement for the slate tiles. The slate is a significant material and the choice of a potential replacement must be declared in the HIA.
 - 35.4 Stone wall cladding: the statements as to whether stone cladding will or will not be replaced or restored is vague. To say that it "could be" reinstated is a good as saying it won't be. The HIA should be precise about what it will be.
37. The Werdmuller Centre is the last remaining unaltered building of Roelof Uytendogaardt's early period. This is a relatively recent status change that has bearing on the rarity of the heritage resource: since the initial application for the Werdmuller Centre, both the UCT Sport Centre and the UWC Sport Centre have been overwritten by alterations and additions. The analysis of various aspects of the Werdmuller Centre, including the 3D photogrammetric laser scan of the building undertaken to survey the building, included in the Heritage Impact Assessments to date are valuable additions to the discourse on the Werdmuller Centre and the body of work of Roelof Uytendogaardt. It is requested that the applicant donate a digital copy of the scan to the University of Cape Town's Manuscripts and Archives collection of Uytendogaardt's work.

Proposed indicators for redevelopment proposals:

38. It is a common goal to guide redevelopment of the Werdmuller Centre in a manner that does not compromise the heritage significance of the resource. Docomomo-SA has commented extensively on the design indicators put forward in the previous draft HIA, and were not in agreement with the indicators or the manner in which they leave room for interpretation that can be detrimental to the Grade 2 site. We therefore request that the following conditions are included in the approval of redevelopment proposals for the Werdmuller Centre:
- 38.1. The **parallelogram offices** must be retained entirely, with demolitions limited to renovations / reconstruction of the exterior (including shopfronts on all levels).
 - 38.2. **LHC2** must be retained entirely, with demolitions limited to renovations / reconstruction of the exterior (including shopfronts) and internal divisions. It is essential that external covered areas be retained as communal areas. The filling in or extension of floor plates must not be allowed in LHC2. No overhead development must be allowed to LHC2.
 - 38.3. We concur with the design indicator that the **articulated roof landscape** of LHC2 is highly significant aspect of modernist expression, and accordingly the various rectilinear boxes, curvilinear walls and planters must be retained and restored.
 - 38.4. The **interstitial space** as well as ramps, seats, planters, balustrades, porticos, verandahs and screen elements that contribute to the definition and character of this space must be retained. The

- proposed glazed enclosure for weather proofing must not interrupt or subdivide the interstitial space but rather sit above it.
- 38.5. The **double curved wall** on the LHC1 side of the interstitial space must be retained as the foil to the articulated interface to LHC2.
 - 38.6. The **prominent curved ramp**, in the gap between LHC1 and LHC2, that leads up to the upper ground floor of LHC2 must be restored to remain in its original condition. This ramp leads to a series of smaller circulation routes ending in two small stairs descending to Ralph Street and Claremont Boulevard respectively. This route is probably the most photographed and appreciated feature of the building and must remain public and cannot be partitioned or internalized.
 - 38.7. The **main public thoroughfares and ground planes of LHC2** must be retained, as well as the visual links through to the interstitial space. The design intention of providing thoroughfares from Main Road to the station must be acknowledged and incorporated in the redevelopment of LHC1. There are opportunities to reinstate the visual separation between the curved wall and LHC2 through the removal of the vertical sheeting to the south bridge, and to improve pedestrian links between the rear and Main Road front.
 - 38.8. The **extent of demolition to LHC1** must be reviewed to reduce the extent of demolition or otherwise off-set the proposed demolition through acknowledgement of the design intentions of the original project. Examples of such offsets would be to incorporate into the design resolution of the Main Road interface a way of drawing visitors/ pedestrians into and through the building from Main Road, as well as making meaningful provision for small scale and informal traders along pedestrian routes.
 - 38.9. The deep splay to the **Main Road interface** as well as the circular shopfront and open corner behind the diagonal screen wall on the corner of Main Road and Newry Streets are significant elements that tie together the architectural language of LHC1 and LHC2, and should therefore be retained or at least reinterpreted in design proposals for this area of the site.
 - 38.10. The potential **loss of existing fabric** through demolition for the purpose of rationalizing structure and floor plates and/or allowing a tall building on the site must be mitigated by exceptional architectural skill and a highly desirable and appropriate function in the context of a landmark building at the centre of the Claremont CBD and the public transport interchange, that redefines the Werdmuller Centre as “the place for people”. In this context, any parking provided at the discretion of the developer, should be at basement level.
 - 38.11. There must be **differentiation between new interventions and existing fabric**. The overall scale and building envelope of new development must be resolved in such a way as to retain the integrity of the Werdmuller Centre, with discernable transitions and separations to any development overhead.
 - 38.12. The **specification of glazing** to deal with both restoration and energy performance must be clarified in the HIA and opened for comment by I&APs.
 - 38.13. The Werdmuller Centre has a very particular material and finishes palette that is central to its heritage significance but also central to its controversial perception by the public. Therefore **material renovation and replacements** must be clarified at a detailed level in the HIA, and opened for comment by I&APs. An overall strategy for a material palette must be presented in the final HIA.

Heritage process:

39. Docomomo-SA's focus in this process has been on the recognition, documentation and conservation of the Werdmuller Centre as an exceptional modern movement site in the South African and Western Cape context. After many years of campaigning for the continued relevance of the site, through Heritage Western Cape the site now has Grade 2 status, with potential Provincial Heritage Site declaration pending the parallel HIA process.
40. This positive, although protracted, outcome has been marred by a number of factors that must be noted here and which we are considering to address with Heritage Western Cape directly following further consultation with our chapter members:
 - 40.1. There is a perception of bias in the interest of the applicant in the involvement of the heritage professional Ms Cindy Postlethwayt in dual roles of decision-maker and heritage advisor for this submission. Ms Postlethwayt served as chair of the IACOM meeting that supported (as an interim comment as pre-cursor to the present report) the present heritage indicators that are in conflict with the Grade 2 grading first considered and endorsed by the IGICOM. It is of concern that the proposal that we are commenting on in this document is a direct consequence of the heritage indicators as put forward in 2016 and which that committee recommended be supported.
 - 40.2. It is an often repeated motivation in the various reports that the number of respondents in the public participation process has reduced significantly since the original database of interested and affected parties (I&APs). It is noted here that this is not only a consequence of participation fatigue over a period of more than a decade and changing contact details of the I&APs but also exclusionary advertising and means of notification to which we have objected to in the past. It is noted that while

the owners' representations over various applications related to the Werdmuller Centre are included in the report, the only public comments included are those to the revised draft Phase 1 HIA dated June 2016.

40.3. We also note with concern that unauthorized demolition of parts of the building have been taking place, and the building has been allowed to deteriorate rapidly. This point will also be dealt with separately with HWC.

41. In conclusion, Docomomo-SA objects to the proposal for the reasons stated above which have the accumulate effect of undermining the Grade 2 status of the site. The proposal is in direct conflict of IGIC's directive of 5 September 2016 that IACOM is "constrained to ensure that alterations/ additions not reduce the significance of the complex to less than Grade 2". We therefore request that HWC do not endorse the recommendations or proposals put forward, and ask for the design proposals as well as the design indicators to be revisited.

42. We thank you for the opportunity to comment on the design proposals and heritage impact assessment, and herewith reserve the right to comment further on any proposals relating to the Werdmuller Centre.

Kind regards



Ilze Wolff

written in partnership and in discussion with Docomomo SA members.

Attached:

- Annexure 1: Provincial Heritage Site nomination form and expanded statement of significance.
- Annexure 2: Docomomo-SA comment dated December 2013
- Annexure 3: Docomomo-SA comment dated November 2015
- Annexure 4: Docomomo-SA comment dated June 2016

<p><u>Chair</u> Ilze Wolff Email: ilze@wolffarchitects.co.za 0724480848</p>		<p><u>Treasurer</u> Louise van Riet Email: louise@louisevanriet.co.za 0828082255</p>
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Cindy Postlethway
7 Ritchie Avenue, Kenilworth
Cape Town 7708
South Africa

Lisbon, 14th June 2017

Subject: Comment on Draft Heritage Impact Assessment Report, May 2017, regarding a proposed development, Werdmuller Centre, Erf 54472 Cape Town. HWC Reference: 15022403

Dear Cindy Postlethway,

With this letter, Docomomo International (Documentation and Conservation of Buildings, Sites and Neighbourhoods of the Modern Movement International Committee) would like to express our endorsement to the comments made on the Heritage Impact Assessment by Docomomo South Africa.

Docomomo International is aware of the international campaign to save the Werdmuller Centre and agree with the comments made by Docomomo South Africa that wishes to conscious Heritage Impact Assessment for the importance of this building explaining why this proposed development should be denied and revised.

As Chair of Docomomo International, I affirm that the Werdmuller Centrein is an exceptional Modern Movement building and all the efforts should be done in order to preserve this shopping centre that should be fully restored, taking into consideration the history of the building and the willing to maintain its integrity and authenticity for future generations.

Yours sincerely,



Ana Tostões
docomomo International Chair

REGISTER MAIL

Our Ref: HM/ CAPE TOWN METROPOLITAN/CLAREMONT/ERF 54472
Case No.: 15022403ZS0302M
Enquiries: Katherine Robinson
E-mail: Katherine.Robinson@westerncape.gov.za
Tel 021 483 9783
Date: 06 September 2017

NPV Holdings (Pty) Ltd
P. O. Box 23640
Claremont
7735
In care of Ms. Cindy Postlethwayt

FINAL DECISION
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

HERITAGE IMPACT ASSESSMENT: IMPACT ASSESSMENT REPORT PHASE TWO FOR ERF 54472, THE WERDMULLER CENTRE, 167 MAIN ROAD, CLAREMONT, SUBMITTED IN TERMS OF SECTION 38(4) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

CASE NUMBER: 15022403ZS0302M

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter received on 24 July 2017. This matter was discussed at the Impact Assessment Committee (IACom) meeting held on 08 August 2017.

FINAL DECISION:

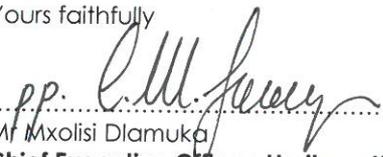
- The Committee resolved not to support the proposed development as has been tabled (in its current form) as it was felt that the scale, bulk and proposed interventions impacted negatively on the identified heritage resource as a whole and in particular the highly significant LHC2 building and the interstitial space.

Notes:

- This decision is subject to an **appeal period of 14 working days**.
- The applicant is required to inform any party who has expressed a bona fide interest in any heritage-related aspect of this record of decision. The appeal period shall be taken from the date above. It should be noted that for an appeal to be deemed valid it must refer to the decision, it must be submitted by the due date and it must set out the grounds of the appeal. Appeals must be addressed to the official named above and it is the responsibility of the appellant to confirm that the appeal has been received within the appeal period.

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

Yours faithfully


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Mxolisi Dlamuka
Chief Executive Officer, Heritage Western Cape