7. ASSESSMENT OF THE PROPOSAL

This section provides an assessment of the proposal against the heritage indicators and informants.

7.1 Response to policy informants

The proposed intervention responds positively to overall policy informants, particularly where medium to high density development is envisioned for the site across the range of policies considered. The site is located within a precinct along Sir Lowry Road earmarked for higher density mixed-use development intervention. The site is located on the edge of the metropolitan node within an urban development zone earmarked for intensification of mixed-use development.

7.2 Response to heritage indicators

7.2.1 Historical indicators

Sir Lowry Road as historical route and trade centre

The proposal is for a mixed-use development with the Sir Lowry Road facade retaining the original facades and improving visibility into a large showroom space that wraps around into Muir and Reform streets, providing the opportunity for activity to spread into those side streets as well. *This respects the identified heritage indicator.*

Alexander Tyres and the Art Deco fascination with the motor car

This part of the building is incorporated into the proposed development. The walled enclosure of the service station portion is to be removed and the space incorporated into the proposed showroom as an extension of its display area with a glazed rather than masonry enclosure. The unsympathetic shopfronts on Sir Lowry Road are to be replaced with more sympathetic contemporary ones. *This respects the identified heritage indicator*.

Modernist warehouses

The proposal retains the existing footprint of the building, with 0m setbacks as the current complex has. The Modernist warehouses are not retained, but the elevational treatment of the new building incorporates elements that "bookend" the Selkirk Street facade, and wrap onto Muir and Reform Streets as the pair of warehouses currently do. *This respects the identified heritage indicator*.

7.2.2 Contextual

The redevelopment plans for District Six

These plans emphasise the role of Sir Lowry Road as an arterial route for District Six and the need for medium-to-high density, mixed-use development along it in order to achieve through urban design a vibrant urban environment in a redeveloped District Six. The proposal is for a medium-to-high density, mixed-use development, which reactivates the Art Deco ensemble of facades along its Sir Lowry Road edge and provides access to the residential component of the development from Selkirk Street. This acknowledges that residential use is proposed for the vacant block between erf 7134 and the mosque. Given that the four blocks (including erf 7134) bounded by Sir Lowry, Chapel, Matveld, Muir and Stuckeris Streets are zoned Mixed Use 3 with a 35m height restriction on development, the approach has been taken that this part of a redeveloped District Six might be a high density, high-rise residential precinct. As a proactive design strategy, the entrance to this development's residential component is proposed.

where it might relate to that of the block behind it, creating the opportunity for a positive urban space to be created between the two blocks. *The proposal respects this identified heritage indicator.*

A component of the issues raised in redevelopment plans is that of an activity node between the site and the Good Hope Centre, which has the potential in the future to bring vibrancy back to this part of the City and remember the New Market site and its role in the City. How this can be accommodated in the current, degraded, public realm of the area is a complicated issue and perhaps rather than be attempted now, should rather be allowed for in how the area might evolve around the current proposed development. The proposal therefore does not directly address this component heritage indicator, but does address the primary indicator.

The Nelson Mandela Boulevard overpass

This urban element has had a huge negative impact on Sir Lowry Road and District Six, cutting portions of District Six off from the rest of the area and similarly creating a spatial disjuncture along Sir Lowry Road. It is taller than the surrounding historic fabric and overpowers the space, but must be considered within the streetscape when designing new interventions in its proximity. It is only one block east of erf 7134 and thus is an indicator for that site. *The proposal respects this indicator and incorporates the design informant it generates into the design strategy for the site in a positive way*.

Streetscape, urban context and topography

The streetscape silhouette along Sir Lowry Road, from the overpass to the intersection with Constitution Street, is currently dominated by large, new buildings on the southern edge and the Good Hope Centre on the northern edge. The zoning rights in this area permit these multi-storey buildings as of right. The Constitution Street intersection is a major one, linking District Six with both the Foreshore and the CBD. In addition, the topography of the area, with District Six on the uphill slopes on the southern side of Sir Lowry Road, should be considered in designing in this area. *These aspects of the receiving environment have been considered in the design approach and the proposal incorporates both them and the design informants generated from them in a positive way.*

7.2.3 Architectural

Appropriate responses to the Alexander Tyres Building

The Alexander Tyres building is of sufficient significance to warrant informing the design of the proposed interventions on erf 7134. Elements to consider are: the street edge setback, the vertical corner element, the re- activation of the street edge by re- instating original shopfronts in Reform and Sir Lowry Roads and covered open areas (the former service station).

The proposal sets the building envelope back on both Sir Lowry Roac and Reform Street, so that the landmark qualities of the Alexander Tyres corner element were not overshadowed. Replacement shopfronts more in keeping with the building are proposed and the former service station area incorporated positively into the proposec showroom. The proposal can thus be considered to positively respond to the indicator relating to the Alexander Tyres building.

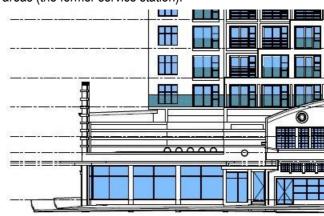


Figure 72: detail of Alexander Tyres corner of the proposed development (courtesy Gordon Hart Architects)

The Sir Lowry Road elevation

The Sir Lowry Road elevation is the only existing fabric that is retained in this proposal. However, this is not merely a token retention, as the proposed ground floor use is as a showroom, which is an appropriate adaptive reuse for a series of buildings that have been warehouses and showrooms for most of the C20th to present. In addition, the proposed additional stories are set back from Sir Lowry Road and part of Reform Street to allow the facade and particularly the Alexander Tyres corner element to continue to be a landmark in the streetscape for pedestrians and motorists. There is also a setback to Muir Street. *The proposal is respectful of the Sir Lowry Road elevation and is in accordance with this heritage indicator.*

The Selkirk street elevation

The pair of warehouses, one on each corner of the block, are proposed for demolition in the proposal. However, their form is recalled conceptually in the elevational treatment of the proposal. Too literal a re-use of the form could, as can be seen in the figures below, have compromised the overall composition of the proposed elevation.



Figure 73: Current Selkirk Street elevation (courtesy Google Streetview accessed October 2021)



SELKIRK STREET ELEVATION

Warehouses and Belfast trusses

The proposal does not retain any built fabric other than the Sir Lowry Street facade and can therefore be considered in alignment with this indicator.

Roofscape

The proposal does not retain any built fabric other than the Sir Lowry Street facade and can therefore be considered in alignment with this indicator, given the overall adherence to the other identified indicators and informants, which is a condition within this indicator and its accompanying design indicator.

7.3 Response to design informants

7.3.1 Historical

Sir Lowry Road: the New Market, the route south and the boundary to District Six

The design proposal is for a fairly high density, mixed use development, which shouldbring vibrancy and the critical mass of residents and commuters to the area to make public transport viable along Sir Lowry Road.

The proposal acknowledges the significance of Sir Lowry Road, creating an activated street interface along its Sir Lowry Road edge by improving the shopfronts along the existing Sir Lowry Road facades. *The assessment is that the proposal incorporates the identified design informant in a positive way.*

Alexander Tyres and the Art Deco fascination with the motor car

The articulation of the Reform/ Sir Lowry Road corner includes the stepping back of the new building above, so that it accords the retained building facade enough space to continue to have landmark qualities. Shopfronts sympathetic in style with the retained facade are proposed to replace existing, later insertions and the use of a glazed rather than masonry enclosure of the former Alexander Tyres service station are proposed. The design team and developer were concerned that the current uses and character of the area, which were assessed as quite degraded on the site inspection, would mean that leaving the cantilevered roof and a rather generous sheltered area would result in the occupation of the old service station by homeless people, with the unfortunate consequent issues for site cleanliness and maintenance that would negatively impact on the heritage resource and overall urban design intentions for the site. For similar reasons, it was not felt that an open-air coffee shop was appropriate under the cantilvered roof either. Enclosure with glazing and using the area as an extension of the showroom was therefore the preferred design strategy. *The assessment is that the proposal incorporates the identified design informant in a positive way*.

Modernist warehouses

All the buildings other than the Sir Lowry Road facades are proposed for demolition in the development proposal. Thus the warehouses are not proposed for retention. However, elevation treatment of the new building includes elements that evoke the "bookends" that the pair of warehouses on each end of the Selkirk street provide to that elevation. *The assessment is that the proposal incorporates the identified design informant in a positive way.*

7.3.2 Contextual

The redevelopment plans for District Six

The proposal exercises the site's development rights. These may appear extensive, but the overall height assessed within that of both the existing buildings and the rights of surrounding sites is not significantly out of keeping with either as yet unexercised, or already exercised rights. The key issues within the existing studies are that the Sir Lowry Road edge of District Six should be dense enough to provide the critical mass of residents to make public transport viable and be mixed use in character to create a vibrant urban space. The fact that the studies allow for a variance in height along this edge in order to achieve the two aforementioned goals is of critical importance in assessing what is an appropriate height along this edge of District Six. It acknowledges that some taller buildings will be needed to achieve the greater urban design goals.

Thus, in this assessment, the extent to which the height and massing rights of the site are proposed to be exercised, are not considered in appropriate, but rather in alignment with the intentions of the urban design guidelines incorporated into the current guiding documents for development in District Six and its Sir Lowry Road edge. *The assessment is that the proposal incorporates the identified design informant in a positive way.*

The Nelson Mandela Boulevard overpass

The overpass is a tall and dominant element in the urban environment, which, together with Six-76 (far RHS of image) "bookends" the existing buildings between the two features. It is probable that the site directly behind erf 7134 will also eventually be of similar scale.

Given the existing rights (Mixed Use 3) of the four blocks visible in Figure 75, it is very likely that this part of Sir Lowry Road will be dominated by buildings of the scale of Six-76 eventually. In fact, should a building of the Six-76 height be built on the filling station site (and its rights certainly allow for this height), it will be taller than the over-pass and visually mitigate the over-pass's dominance in the Sir Lowry Road streetscape.



Figure 75: View towards the site from the fly over (GoogleEarth image accessed August 2021)

The height of any proposal on erf 7134 will need to consider the two tall and overpowering existing elements (the fly-over and Six-76), as well as the potential scale, height and massing of the filling station block and the blocks behind it and erf 7134 (all four being Mixed Use 3) and the finer-grained residential fabric proposed for the blocks upslope from

the Mixed Use 3 sites when District Six is redeveloped. A balance will need to be struck and a transition made somehow between these two quite disparate built fabric grains – that of the Mixed Use 3 sites and the finer grained fabric proposed for residential redevelopment of District Six.

It does not make sense for the building on erf 7134 to be a transition building within the urban environment. That the future building on the block behind it, being also closer to the mosque (a declared heritage site forming part of the District Six National Heritage Site) fulfill this role once it is built, is more appropriate. This will allow for the four blocks with Mixed Use 3 rights to be designed as a high-density, mixed use precinct with residential units of a type that fit into this vibrant and urban context, with the finer-

grained residential development (envisaged in the existing studies, such as Le Grange, 2003) upslope from it. It is thus recommended that the Sir Lowry Road buildings with Mixed Use 3 rights (on erf 7134 and the filling station site) respond to the Sir Lowry Road silhouette and height rights and the two blocks behind them be earmarked as transitional buildings with Mixed Use 3 rights.

The proposal responds to the Sir Lowry Road silhouette and height rights and does not attempt to be a transition building. It works from the premise that a building with equivalent rights to those of erf 7134 will be built between it and the mosque. It does, however, acknowledge its potential role in creating the opportunity for positive space-making between it and its eventual Selkirk Street neighbour by locating the access to the residential component of the development on the Selkirk Street elevation. This creates the opportunity for the kind of space-making between buildings and at entrances that are described by Le Grange (2003: 15-22) in his discussion of micro-scale urban principles. *This design approach is in line with the identified design informant.*

Height and massing in response to streetscape, urban context and topography

Height and massing are the architectural elements that have great impact on streetscape and urban context. How the whole building addresses the two dominant elements in the street silhouette will be important, as will be where height is reduced or the mass of the building pulled back in order to give emphasis to an existing architectural element, or create a new, more positive relationship with the street or local urban elements of significance, such as the Good Hope Centre.

While the gradient southwards from the site is not very steep, it does result in a rise in elevation that may mitigate some of the impact of a taller building on erf 7134. This should be investigated using long sections as part of the design development process. Using the setback lines of the existing Sir Lowry Road facade and the Reform Street edge of the Alexander Tyres building in those parts of the building brings the opportunity to step the footprint line of the new building, creating a podium base upon which additional bulk and mass can be set back and stepped in height in response to the other indicators identified. On the Muir, Selkirk and rest of Reform St facades, a 0m setback could be argued for, evoking the line of the current warehouses. The proposal has incorporated these informants, resulting in the parking being below grade on Selkirk Street and the showroom on grade with Sir Lowry Road extending over approximately half of the site. *It can thus be considered to have positively responded to the identified design informant.*

7.3.3 Architectural

Appropriate responses to the Alexander Tyres Building

The design has incorporated all the issues listed and provided a coherent motivation for not using the former service station area as an open-air coffee shop or similar function. *The proposal has positively incorporated the informants identified.*

The Sir Lowry Road elevation

The design has given due regard to the Sir Lowry Road elevation and is predicated upon its retention and re-use as the facade for a large showroom that stretches across the Sir Lowry Road elevation of the building and around into the two side streets, with shopfronts creating a link between the showroom and those roads, hopefully activating them. There is sufficient setback of the

proposed building from the existing facade to allow for engineers to appropriately stabilise and connect the existing facade to the new fabric. The proposal has positively responded to this design informant in both conception of the building and its proposed architectural resolution.

The Selkirk street elevation

The setting back from Sir Lowry Road and parts of Reform and Muir Streets meant that the design team concentrated bulk on this part of the site.. The elevation was also given some articulation through detailing and stepping forward of the base of the building. It does not read as a back elevation, which is appropriate considering that this is where the entrance to the residential component of the development is located and that this elevation of the building will have a direct (and logical) relationship with a future building on the site behind erf 7134, if that is to be residential (or even mixed use as its zoning allows) as indicated in proposals for the redevelopment of District Six. *The design team has positively incorporated these design informants into the proposal.*

Warehouses and Belfast trusses

As this design informant is not identified as one of primary significance for this site, it is not necessary that it inform design. The Belfast trusses and warehouses are not going to be retained in this proposal, *which is in line with this identified deign informant.*

Roofscape

The overall design has aligned with all indicators and informants except those relating to the warehouses, Belfast trusses and roofscape of the existing building. However, as these were not primary indicators and informants, this should not be considered a fatal flaw to the proposal. The way in which the rest of the identified indicators and informants have been incorporated into the proposal definitely outweighs the need to retain the three elements listed.

7.4 Impact relative to sustainable social and economic benefits

It is believed that the project could result in social and economic benefits. Job creation will need to be considered within both construction and operational phases of the development. No families are being displaced and the site is not subject to a land claim. The proposed intervention would result in positive benefits and will not result in a negative impact on heritage resources. A no-go development option would result in a loss of potential benefits.

7.5 Impact on heritage resources

The townscape is considered sufficiently resilient with considerable absorption capacity and an ability to accommodate intervention without experiencing unacceptable effects to heritage significance. The proposed intervention will not detract from heritage significance. Overall status of heritage impact is considered as low.

8. CONSULTATION

Heritage Western Cape requires that comment be requested from relevant registered conservation bodies and the relevant municipality. While regulations do not specify protocol for public participation, the HWC guidelines for public consultation dated June 2019 have been taken into consideration.

The following is being undertaken:

- · comment requested from conservation bodies with a registered interest
- · comment requested from the local authority, City of Cape Town Heritage Resources Section
- · local ward councillor informed and comment requested
- A3 size notice placed in clear public view on site for the duration of the commenting period

In addition, the following will be undertaken:

- · comment requested from the South African Heritage Resources Agency (SAHRA)
- · relevant documentation made available upon request for duration of the commenting period
- vida contact details made available for clarification of queries electronically and / or via zoom for the duration of the commenting period

This draft heritage impact assessment is to be made available for comment. Documentation will be distributed electronically. Should any additional information be required during the commenting period, such will be made available, however, commenting period will be considered as per timeframes outlined in this report. Submissions received will be included within final report for submission to the authorities. Only comments on heritage grounds will be considered and late comments will not be considered.

Responses to the draft heritage assessment report will be incorporated within final submission for consideration by the heritage authorities. Proof of consultation will be documented for inclusion within the final report to be submitted to the authorities. The 30-day consultation period is to be undertaken commencing 28 October 2021 and concluding 29 November 2021.

9. DRAFT CONCLUSION

The existing rights on erf 7134 are such that a large development (when compared to the existing) was inevitable within a densifying city and this close to the city centre. The key issue was going to be how the heritage significances of the site and its receiving environment – the former District Six, as yet redeveloped – were handled in developing a proposal for the site. The developers have included heritage as a key factor in identifying opportunities and constraints for the potential development of the site and have, as a result, engaged early in the process with the heritage team. The identification of heritage indicators and informants preceded design work. The identified heritage significances, indicators and design informants were actively engaged with and incorporated into the design. The difficulty in this case is that the designers are almost designing in a void. The empty landscape left by the demolition of District Six informs design as it is a national heritage resource. Fortunately, the current proposal is being framed after much work has been done in formulating a spatial vision for a redeveloped District Six. In responding to that, the existing land use rights and the heritage issues identified, the design team could formulate an architectural approach to the site and the proposal. This is legible in the sketches assessed in this report.

In order to exercise the existing rights, the design team has opted to demolish existing fabric except the Sir Lowry Road facade and to give that due space and respectful treatment in the proposal. It was the key heritage element identified by the heritage process and thus giving it prominence was a decision in alignment with the heritage assessments of the site and its fabric. The design proposal is for a contemporary "tower" element of 11 stories above the existing two stories, which is within the existing rights of the site (Mixed Use 3) but set back in response to the identified heritage indicators and design informants and using function and elevational treatment on replacement elevations on the site to bring activity to those street interfaces and articulation and interest to the new elevations. The interplay of forms in both two- and three- dimensions in the elevation draw to some extent on the forms used in the Art Deco style, but avoid the kind of direct reference that might have made this a new intervention in competition with the existing. Rather, it is an interesting, yet backdrop, building when viewed from Sir Lowry Road and an interesting new building with subtle historic references when viewed from other angles.

The assessment of the proposal against each of the identified heritage indicators and design informants has shown that the proposal is almost entirely in accordance with the identified heritage indicators and design informants. Where it is not, is in those indicators and informants that were identified as secondary, given that the grading of the individual elements they referred to – the roofscape, warehouses and Belfast trusses – had not identified them as being conservation-worthy.

The assessment of the existing fabric was that the Sir Lowry Road elevation – particularly the Alexander Tyres part of it – was the primary heritage resource on the site. It was acknowledged that, to give it due significance in a development proposal yet exercise existing rights to create a socio-economically feasible development, not all existing fabric on the site could be retained. Once the detailed heritage inventory assessment was conducted, it was clear that, other than the Alexander Tyres space, the warehouses on the site were either not conservation-worthy or of a Grade 3C – contextually contributing to the overall massing of the whole block – nature. There was little to no internal, conservation- worthy fabric, either due to substantial internal alterations over time or because, as warehouses, they were characterised by large, clear-span, open spaces rather than much internal fabric.

The strategy to demolish all except the Sir Lowry Road elevation is thus supported given the extent to which other indicators and informants were incorporated into the design. The retention of the Sir Lowry Road facade is as part of a showroom space, and integral to it, which is, firstly, an appropriate adaptive re-use for the existing fabric and, secondly, not merely aesthetic retention of the facade – or "facading". This amounts to a defensible reason for this design approach, which should be taken into detail resolution in a method statement by the structural engineers on the project, once it gets to that stage.

The issue of the height of the building is, no doubt, going to be raised in public consultation. This is an issue that has been extensively explored in this assessment. In brief, this site is, with three others around it, anomalous in terms of its zoning, which allows for the height, scale and massing proposed here. The applicants are not requesting additional rights. The four Mixed Use 3 sites are also uncharacteristic of the area when considered in the light of existing urban design and planning studies that are guiding the redevelopment of District Six. However, these four blocks are on the edge of District Six, in the last two blocks before Sir Lowry Road. Thus, it is reasonable to take the approach that these four blocks should be assessed using the criteria for buildings along Sir Lowry Road, established in the existing studies. The principles outlined are that they should be high density, mixed-use and that some latitude can be considered in terms of height. Those principles, coupled with an assessment of the existing silhouette of buildings along this stretch of Sir Lowry Road, indicated that the character of this part of the road is one of high buildings between Six-76 and Constitution Street, then the lower height of erf 7134 and the adjacent filling station. East of that, is the over pass, an intrusive element in the environment. Given this context and the zoning rights of sites around erf 7134 (for tall, mixed-use development), it is concluded that a redevelopment of the site to a similar height can be supported.

Overall, it is concluded that the proposal generally conforms to the heritage indicators and design informants identified earlier in the heritage process and has thoughtfully incorporated these into the design. The receiving environment has little surviving built fabric, but is part of the District Six National Heritage Resource and thus the guidelines for the redevelopment of District Six should inform development in the area. This proposal does, in the opinion of the assessor, respond positively to the District Six redevelopment guidelines and therefore can be supported.

10. DRAFT RECOMMENDATIONS

From the assessment conducted and the conclusions drawn, this report recommends that HWC endorse the assessment and support the development proposal on condition that the Local Authority submission drawings be generally in accordance with the proposal assessed in this report and be submitted to HWC for final stamping before submission to the City of Cape Town for approval.

This draft recommendation is framed so as to generate responses from interested parties and elicit feedback to inform the final heritage impact assessment.

	67
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