UPDATED REPORT ON THE STATE OF CONSERVATION OF THE HISTORIC INNER CITY OF PARAMARIBO WORLD HERITAGE SITE



THE GOVERNMENT OF THE REPUBLIC OF SURINAME

December 2015

Introduction

At its 38th session in 2014 in Doha-Qatar the UNESCO World Heritage Committee examined the state of conservation of the property "Historic Inner City of Paramaribo" and requested the State Party (Government of the Republic of Suriname) to submit by 1 December 2015 an updated report on the state of conservation of the property as well on the implementation of its recommendations.

This report is an update on the present state of conservation of the Historic Inner City of Paramaribo World Heritage Site. It succeeds the report of January 2014.

The State Party hereby authorizes the public upload of the report on the website of the World Heritage Centre.

The Site Management Authority of the Historic Inner City of Paramaribo World Heritage Site,

Suriname Built Heritage Foundation Drs. Stephen A. Fokké December 2015

EXECUTIVE SUMMARY ON THE STATE OF CONSERVATION OF THE HISTORIC INNER CITY OF PARAMARIBO WORLD HERITAGE SITE

In order to safeguard the historic inner city of Paramaribo world heritage site the Government of the Republic of Suriname approved an Emergency plan in 2014. This plan consisted of short term measures regarding the management, conservation, public awareness, legal framework, traffic/parking and urban planning of the old city centre of Paramaribo.

More than a year later still a lot needs to be done. The city faces a number of great challenges especially regarding the management and conservation of the world heritage property. Lack of funding was and still is a major obstacle for the Government for the preservation and regular maintenance of the many government owned monumental buildings. For instance, in the draft budget of 2016 of the Ministry of Public Works less than US\$ 500.000 is proposed for maintaining government buildings including its monumental building stock. Policy and state budget are clearly not in line with preservation needs long overdue. The built heritage sector clearly suffered the consequences of the lack of funding. Given the present economic crisis of Suriname prospects seems not to be very good.

The private sector however managed to fulfill its part of the preservation of Paramaribo's built heritage. A number of privately owned monuments were restored and maintained setting a good example of how it should be done properly.

Besides management and conservation, increasing public awareness about world heritage among the general public and especially policymakers and politicians is a must to move forward in safeguarding the historic inner city of Paramaribo.

A. RESPONSE STATE PARTY TO WORLD HERITAGE COMMITTEE'S DECISION

At its 38th session in 2014 in Doha-Qatar the World Heritage Committee adopted Decision 38 COM 7B.47 regarding the State of Conservation of the Historic Inner City of Paramaribo.

Below the text of the Decision:

ANNEX I

Extract of the Decisions adopted by the World Heritage Committee at its 38th session (Doha, 2014)

Decision: 38 COM 7B.47

The World Heritage Committee,

- 2. Having examined Document WHC-14/38.COM?7B,
- 3. Recalling Decision **26 COM 23.20**, adopted at its 26th session (Budapest, 2002),
- 4. <u>Welcomes</u> the development and approval of the Emergency Action Plan for the property and the efforts being made by the State Party to address conservation and management concerns:
- 5. <u>Urges</u> the State Party to continue with the implementation of actions foreseen, in particular:
 - a) Update and harmonize legislative and regulatory frameworks to address overlaps and strengthen the role of the Management Authority,
 - b) Finalize the formal process for the adoption of the Paramaribo Historic Inner City Management Plan and broadly disseminate its contents to ensure its implementation by all stakeholders.
 - c) Develop a zoning plan and urban regulations to complement existing provisions in the Management Plan,
 - d) Establish the Building Committee of Public Works to evaluate designs for new projects,
 - e) Finalise the formal process for establishing buffer zones and their regulatory measures and submit a proposal for a minor boundary modification, according to the procedure established by the Operational Guidelines, for examination by the World Heritage Committee;
- 6. <u>Acknowledges</u> the State Party's commitment to ensure that all requests to demolish historic buildings are be rejected;
- 7. Requests the State Party to submit, in accordance to Paragraph 172 of the Operational Guidelines, project proposals for the development of the Waterfront as well as technical specifications and details about the foreseen conservation and rehabilitation interventions within the property for its buffer zone, for review prior to making commitments to their implementation.
- 8. <u>Also requests</u> the State Party to submit to the World Heritage Centre by **1 December 2015**, an updated report, including a 1-page executive summary, on the state of conservation of the property and the implementation of the above, for the examination by the World Heritage Committee at its 40th session in 2016.

The response of the State Party on Decision 38 COM 7B.47

Paragraph 4. Status of implementation of Emergency Plan for the Historic Inner City of Paramaribo

By letter dated 5 May 2014 ref. Secr.-193 the minister of Education, Science and Culture reported to the World Heritage Centre the following actions which have been taken as part of the Emergency Plan:

- A proposal has been made for sustainable management and responsible use of the historic Independence Square within the World Heritage property. This proposal contains event management guidelines for the proper use of the Independence Square. The proposal has been submitted to the Office of the President of the Republic of Suriname who is responsible for the Independence Square. However no response was received (B4 Emergency Plan).



ONAFHANKELIJKHEIDSPLEIN



Stichting Gebouwd Erfgoed Suriname (SGES)
(UNESCO Site Management Autoriteit Historische Binnenstad van Paramaribo)
in samen werking met de Commissie Monumentenzorg
Maart 2014

Proposal for sustainable management and responsible use of the historic Independence Square

The results of a study regarding advertisement guidelines have been presented in February 2014 to policymakers. In this study, that has been carried out by a consultant on behalf of the Ministry of Public Works, special attention is given to guidelines for advertisement within the Historic Inner of Paramaribo World Heritage Site. The final report of this study titled 'Formulating Guidelines for Advertisement' has been presented by the consultant in March 14, 2014;

A project proposal for the implementation in Suriname of the 'UNESCO World Heritage in Young Hands' project (WHIYH Educational Resource Kit for Suriname) has been submitted in February/March under the 2014-2015 Participation Programme. As part of the project a website 'youthheritage.sr' was launched on June 25th; 2015. The website contains the Educational Resource Kit for Suriname with information and exercises about (Suriname's) World Heritage. It was built by Surinamese ICT students (C1 Emergency Plan).



World Heritage in Young Hands-Educational Resource Kit for Suriname-website youthheritage.sr

- Preparations are made by the Monuments Commission and the Site Management Authority for the establishment of a conservation fund for restoration purposes (Monument Fund Suriname). There were several meetings with the National Development Bank which offered to manage the Monument Fund Suriname. The fund still needs to be worked out in detail;
- Further actions are:
 - A new Building Committee has been appointed by the minister of Public Works on Tuesday 3 November 2015 and is operational (**B1 Emergency Plan**);
 - Open Monuments Day 2014 (C2 Emergency Plan);
 - Publication Monuments Calendar 2014 (C3 Emergency Plan);
 - Proposals for revision of Monuments Act (D1 Emergency Plan);
 - Rehabilitation program of Stadsherstel Suriname NV. This private restoration company buys dilapidated monuments. Funding comes from shareholders. Stadsherstel restores and re-uses the historical buildings and the rent is used for maintenance of the buildings. The company now owns two buildings. A third one is being restored and a fourth one has been sold to house a traditional clothing Museum (**B6 Emergency Plan**).
 - Study on paid parking according to an article in newspaper of 21 December 2015 (E3 Emergency Plan);
 - Rehabilitation program of State-owned monuments has seriously been delayed. In fact most of the state-owned monuments are in a bad state of repair. One major reason is the lack of government funds to restore or maintain the built heritage stock of the state. The following monuments are more or less in urgent need of conservation:

- Gravenstraat 1
- Lim A Postraat 4
- Lim A Postraat 6
- Onafhankelijkheidsplein 7
- Grote Combeweg 3
- Grote Combeweg 7
- Grote Combeweg 9
- Wagenwegstr. 22
- Wagenwegstraat 47
- Mirandastr. 5
- Mirandastr. 7
- Mirandastraat 8
- Gravenstraat 38 hk. Jessurunstr.
- Waterkant 30
- Waterkant 32 hk. Kromme Elleboogstr.
- Toren van Financien
- Vml. Duplessisgebouw
- Keizerstraat 25

Some restoration works on a number of government owned monuments were halted more than a year ago due to the lack of funding. This causes a further deterioration of the buildings since they are vulnerable to weather conditions.



Wagenwegstraat 22



Waterkant 34 corner Kromme Elleboogstraat.

The following measures of the Emergency Plan have not (yet) been implemented:

- A1 to A4; B5; C4; C5; D2; E1, E2, E4, E5 and F1.

Paragraph 5a

Update and harmonize legislative and regulatory frameworks to address overlaps and strengthen the role of the Management Authority

By letter dated May 5, 2014 ref. Secr.-193 the Minister of Education, Science and Culture reported to the World Heritage Centre that proposals were made for revision of the Monuments Act 2002. The revision has not been completed yet. A recent meeting with the Attorney-General brought forward new insights to modify the existing Monuments Act. The conclusion of the Attorney-General was that the existing Act is a repressive Act. According to the Act, only when monuments already have been (partly) demolished or damaged the judicial system comes into action to apply sanctions for violation of the law. But then the damage to monuments already has been done. The Act should be modified in such a way that damage or demolishing of monuments is prevented.

There is no law that legally secures the role and position of the Management Authority and a budget is lacking.

Paragraph 5b

Finalize the formal process for the adoption of the Paramaribo Historic Inner City Management Plan and broadly disseminate its contents to ensure its implementation by all stakeholders

The Paramaribo World Heritage Site Management Plan 2011-2015 has been approved officially by the Council of Ministers on January 28th, 2014. Although an official policy document it is not integrated into the multi-annual development programme of the country nor can it be traced back in the various State Budgets. Only a very small portion has been implemented in a rather isolated manner.

Paragraph 5c

Develop a zoning plan and urban regulations to complement existing provisions in the Management Plan

No progress has been made on this part.

Paragraph 5d

Establish the Building Committee of Public Works to evaluate designs for new projects

In the first State of Conservation Report of January 2014 the following was stated about the Building Committee:

"C4./C5. A draft decision for the re-establishment of the Building Committee of Public Works is being prepared for the Council of Ministers. The Building Committee evaluates the designs of building plans for new structures within the World Heritage Site and adjacent buffer zones¹".

A new Building Committee has been appointed by the minister of Public Works on Tuesday 3 November 2015 and is operational. The Site Management Authority is represented in the Building Committee.

Paragraph 5e

Finalize the formal process for establishing buffer zones and their regulatory measures and submit a proposal for a minor boundary modification.

In the first State of Conservation Report of January 2014 the following was stated about the extension of the existing buffer zones:

"A9. As mentioned in the Management Plan, the existing buffer zones are not sufficient and should be extended. Buffer Zone I (Combé Area) should be extended to the North-West covering streets as Julianastraat, Prins Hendrikstraat, Koninginnestraat and Costerstraat. Buffer Zone II (19th Century urban expansion) should be extended to the South-West covering the Jodenbreestraat, Steenbakkerijstraat, Domineestraat, Maagdenstraat, part of the Waterfront and part of Dr. Sophie Redmondstraat.

Both proposed area extensions contain a number of protected monuments as well as not listed historical buildings.

A new, third buffer zone is proposed namely (part of) the Suriname River¹ bordering the World Heritage Site and Buffer Zones.

A proposal for extension of the existing Buffer Zones One (I) and Two (II) and designating a Third (III) one has been studied on January 23, 2014 by both the Monuments Commission and SGES.

The extension of the buffer zones and designating a third one will have legal implementations. The State Resolution for the establishment of the Building Commission will have to be amended according to the proposed changes. The proposed modifications also have to be submitted to and approved by the World Heritage Committee".

As a result of the discussions between the Site Management Authority (SGES) and the Monuments Commission the proposal mentioned in the State of Conservation Report of

¹ This information was provided by the Director of Public Works during a meeting January 13th, 2014.

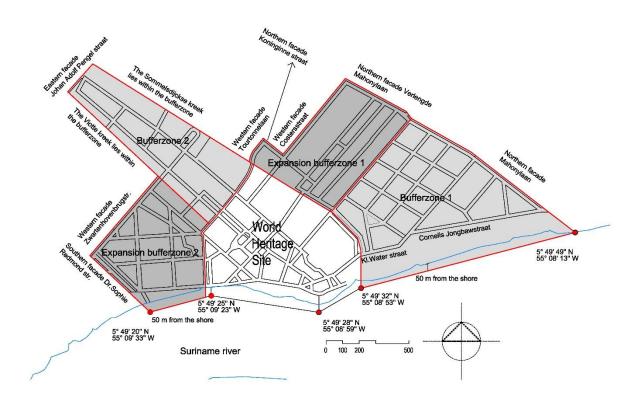
January 2014 which consisted of the extension of the existing buffer zones and designating a third (new) one, was altered. Instead of proposing a third buffer zone the new proposal comprises of the expansion of the existing buffer zones as originally suggested as well as a necessary enlargement of the World Heritage Property with 50metres from the shoreline towards the Suriname River (see proposal). The latter is justified to have control on future constructions of new structures on water (in the River) which can be detrimental to the view on the historic city scape.

Based on the proposed modifications of the borders of the buffer zones and World Heritage Property, a proposal was made for the modification of State Resolution of 31 October 2001 (S.B. 2001 No. 74), since this Resolution forms the legal framework of the Building Committee, which evaluates building plans for new structures within the World Heritage Property and adjacent buffer zones.

Both proposals (expansion of buffer zones & World Heritage Property and modification of the State Resolution of 31 October 2001) were sent in August 2014 to the authorities. However, information received the Site Management Authority that the Government is <u>not an advocate</u> of the expansion of the buffer zones. For this reason the formal process for modification of the borders of the buffer zones and World Heritage Property has not been finalized.

Proposal expansion of existing buffer zones and World Heritage Property





Paragraph 6

Although the Minister received several requests for demolishing an official monument within the world heritage property no permit has been granted.

Paragraph 7

Regarding the project proposal for the redevelopment of part of the Waterfront, the Minister of Education, Science and Culture informed the World Heritage Centre by letter dated 30th October, 2015 ref. M-1382:

"With reference to your letter dated April 15th, 2015 ref. no. CLT/HER/WHC/MR/VG/1884 we hereby inform you as follows.

The former Government did issue in 2012 a piece of the waterfront within the Historic Inner City of Paramaribo to the private company Cactus Ltd. for the construction of a shopping mall, hotel and parking garage.

However, according to very recent information received from Public Works up till now no design plans nor a request for a building permit has officially been submitted by Cactus Ltd. Therefore the Department of Public Works has not issued a building permit to the aforementioned company. As a measure of precaution in order to protect the Outstanding Universal Value of the world heritage property, my colleague of Public Works officially has been requested not to issue a building permit and in case the permit has been issued to withdraw it (see attached letter dated October 16th, 2015). Since the Department of Public Works officially did not receive design plans and other technical information regarding the planned construction along the waterfront, the State Party is not in the position to provide the information to the World Heritage Centre".

The Minister of Public Works responded to his colleague by official letter dated November 3d, 2015 ref. MoW 649/15, that no building permit has been granted to the private company Cactus Ltd.

By chance the Site Management Authority came across the design plans of the project on the website of the architect. Below an artist impression of the shopping mall and parking garage as well as the location of the project within the world heritage property. As stated by both ministers no design plans nor a request for a building permit has officially been submitted by Cactus Ltd.



Artist impression NV Cactus Shopping Mall and Parking Garage (front and side façade)



Artist impression NV Cactus Shopping Mall and Parking Garage (view from above)



Artist impression NV Cactus Shopping Mall and Parking Garage (front façade)



Location of the project along the Waterfront



Location of the project within or bordering the world heritage property.

B. OTHER CURRENT CONSERVATION ISSUES

Sounding Heritage of Paramaribo

On request of the Site Management Authority a mission of the Dutch Cultural Heritage Agency (RCE) chaired by Mr. Rudi van Straten (senior specialist bells, pipe organs, tower clocks and carillons) visited Paramaribo in 2014. The reason for the mission was the request from the ministry of Finance to the Site Management Authority for a technical advice regarding the historic tower clock and bell. The mission was expanded to include also the other sounding heritage of Paramaribo which resulted in a colorful inventory on sounding heritage of Paramaribo. The mission report was published in Oct. 2014. The mission also investigated how local expertise can be

Paramaribo Urban Rehabilitation Program

The Government of the Republic of Suriname and the Inter-American Development Bank (IDB) have initiated the formulation of the 'Paramaribo Urban Rehabilitation Program'. The purpose of this Program is to help preserve the historic inner city of Paramaribo. The components will seek to: (i) consolidate the current institutional framework for the management of the historic inner city; (ii) rehabilitate key buildings and landscapes in the area of protection; and (iii) improve key infrastructure and services within the historic inner city and in connection with the rest of the city.

The Program will contribute to the ongoing urban planning efforts that Suriname has initiated in the past years: The Multi Annual Development Plan 20062011, the 2002 master plan for the drainage of Greater Paramaribo, and the 2005 urban development plan. These three instruments highlight the following issues faced by Paramaribo: (i) lack of tourism development; (ii) inefficient transportation and overcrowding parking; and (iii) the need for a better coordinated institutional setting.

The strategy for Program design will built upon the lessons learned from experience in the preservation of World Heritage Sites. It concentrates on making historic preservation sustainable. To that end, the Program will: (i) use historic preservation as a catalyst for economic and social development; (ii) encourage multiple sources of financing for investments; and (iii) consolidate synergies between investments in both the historic inner city and the city of Paramaribo.

In May 2014 a 'Fact Finding Mission' of the IDB visited Paramaribo to follow up on the Government of Suriname's (GoS) request for support with the formulation of an urban rehabilitation program in downtown Paramaribo and particularly the area declared World Heritage Site by UNESCO. An Aide Memoire was signed on June 15, 2014.

A second mission, this time an 'Identification Mission' visited Paramaribo in October 2014 with the objective to initiate the design of the Urban Rehabilitation Program. The Aid-Memoire was signed on January 20, 2015.

Since the second mission no further developments regarding the Program have taken place. The Headquarters of IDB is still waiting for the green light from the IDB country office in Suriname. The green light depends upon the approval of the macroeconomic framework for Suriname to be able to move forward with the project of the historic center of Paramaribo.

Study on Preventive Conservation

Two Belgium students of Antwerp University completed in 2015 a study on Preventive Conservation, Maintenance and Monitoring in the Historic Inner City of Paramaribo. The study, which was based on the PRECOMOS principles, was requested by the Site Management Authority.

Heritage Education

a. Minor History & Heritage Tourism

From this academic year on the Faculty of Humanities of the Anton the Kom University of Suriname is offering a minor in 'History & Heritage Tourism' to history students.

b. Basic Education Improvement Programma (BEIP)

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In July 2012 the ministry of Education and Community development started the 2 Basic Education Improvement Programma (BEIP). This education reform programme is financed by the Inter-American Development Bank (IADB).

The main objective of BEIP is to increase the quality of Suriname's primary education. It consists of 4 components: renewal and rewriting of curricula and teaching methods of 4th to 8 grade of primary school, ICT education, infrastructure and capacity building of the education ministry. One area of learning is 'Art & Culture Education' consiting of cultural heritage, visual arts, music, dance & drama.

Proposal for renaming Sommelsdijckse Kreek

In November 2015 the 'Platform of Indigenous Organizations of Suriname' (ESAV) who collaborates with the 'National Reparation Committee of Suriname' (NRCS) submitted a number of proposals to the President of the Republic of Suriname to change some colonial topographical names into their indigenous names. Among those is the 'Sommelsdijckse Creek' which falls within the borders of the world heritage property. Its indigenous name would be 'Paramuru Creek'. No formal decision has yet been taken on this matter.

Articles on this matter:

http://www.de-surinaamse-krant.com/2015/10/zunder-en-zijn-reparatie-commissie.html

http://www.nieuws-suriname.nl/inheemsen-willen-naamswijzigingen-bij-40-jaar-onafhankelijkheid/

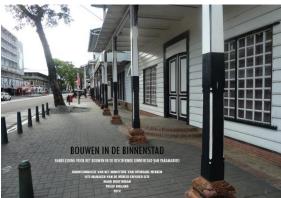
http://thedailyherald.info/index.php?option=com_content&id=59244:reparations-committee-withdraw-queens-names-from-surinames-highest-mountains&Itemid=5

Publications on the Historic Inner City of Paramaribo:

- Bouwen in de historische binnenstad (How to build in the historic inner city of Paramaribo, Philip Dikland & Maud Houterman, 2015). This publication provides practical hints how to build in an historic environment that holds an UNESCO World Heritage status. Based on examples the special building criteria which apply to new structures within the world heritage site are explained to whom it may concern;
- 2. **Restaureren met respect** (Restoring with respect, A technical guide for restoring and expanding monuments in the historic inner city of Paramaribo, Philip Dikland & Maud Houterman, 2015);
- 3. **Public and Private Roles in Historical Inner City Revitalization** by August Choenni, 2015. This publication discusses a number of best practices of public-private cooperation with regard to historic inner city revitalization. The role of Stadsherstel Suriname NV is also mentioned in this study;
- 4. **Inventarisatie Klinkend Erfgoed Paramaribo**, an inventory on the sounding heritage of Paramaribo (bells, tower clocks, pipe organs and carillons), Rudi van Straten 2014.
- 5. A Study on Preventive Conservation of the Built Heritage of the Historic Inner City of Paramaribo, Johanna Hermans & Sofie Lambein, 2015.







C. MAJOR RESTORATIONS, ALTERATIONS AND/OR NEW CONSTRUCTION(S) ENVISAGED WITHIN PROTECTED AREA AND ITS BUFFER ZONES

Reconstruction of the Parliaments building

In the 2014 Report on the State of Conservation of the Historic Inner City of Paramaribo mentioning the following was mentioned:

"December 2013: Invitation to tender for a limited number of architects selected on the basis of a call for expressions of interest for:

- 1. A design for a new Parliaments building on the present location bordering the Independence Square;
- 2. The reconstruction of the old Parliaments building at Gravenstraat 2-4. In 1996 a fire destroyed this important historical building as well as the neighboring Ministries of General Affairs and Foreign Affairs".

As a result of the tender two architects were selected for a design of a new Parliaments building and the reconstruction of the old Parliaments building. A Schedule of Demands/Requirements has been prepared. The architectural work on the reconstruction of the old Parliaments building has progressed the most. Drawings are already prepared. It is proposed to house all operational services, documentation and information in the reconstructed historical building, while the actual parliament meeting room will be located in the new building.

Parliament has appointed its own Parliamentary Building Committee to for both building projects.

Construction of a Commemorative Monument

By letter dated 14 April 2014, ref. Secr.-160/M-720 the minister of Education and Community Development, requested the World Heritage Centre to carry out a technical review of a commemorative monument along the historic Waterfront within the limits of the world heritage property. The construction started in 2013, but stopped several times. The objective of the request was to determine whether the construction of the monument is affecting the outstanding universal value of the property.

The World Heritage Centre requested by letters dated 16 May 2014 ref. CLT/WHC/74/CM/LP/1623 and 16 October 2014, ref. CLT/HER/WHC/LAC/CMT/DB/1743 that

additional information is needed in order to enable ICOMOS International to assess the viability of the construction of the commemorative monument. The photographs and drawings provided were not sufficient in quality to have a full idea of the characteristics of the memorial, such as color, material, height in relation to surroundings and how it sits within the site.

Based on the aforementioned comments the State Party made the following 3D drawings, but since a map positioning the location of the memorial within the world heritage property was still lacking, the information was not sent to the World Heritage Centre.

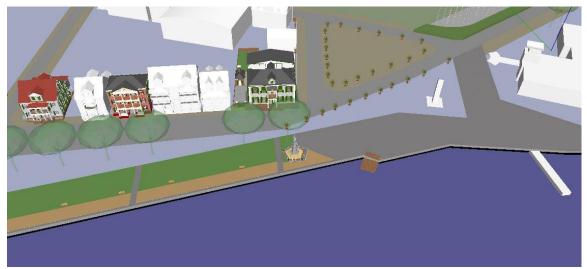




Historic Inner City of Paramaribo (Suriname) (940 rev)

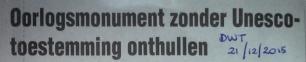


3D model of the commemorative monument along the historic Waterfront.



3D model of the commemorative monument along the historic Waterfront.

According to a newspaper article in De Ware Tijd of 21 December 2015, the memorial will be revealed by the end of this year.



PARAMARIBO — De bouw van het monument aan de Waterkant voor gevallen burgers en militairen wordt nog vóór eind van dit jaar onthuld. Dit zegt Henk Herrenberg, voorzitter van de Commissie Monumenten voor gesneuvelde burgers en militairen 1986-1992 weer eens een keer.

De bouw van het monument is meerdere keren in twee jaar gestaakt omdat de aannemer niet werd uitbetaald. Dat Suriname nog geen toestemming heeft van Unesco om het monument daar te bouwen en te onthullen, lapt Herrenberg aan zijn laars. "Ik heb toe-stemming van de hoogste man in het land", zegt hij, doelend op de president. De plek waar het monu-

ment komt te staan, staat op de Werelderfgoedlijst van Unesco. Via het ministerie van Onderwijs, Weten-schap en Cultuur, dat verantwoordelijk is voor het erfgoed in Suriname, zijn een ontwerp en een 3Dmodel van het monument gestuurd naar de Unesco. Omdat het 3D-model niet aan de voorwaarden vol-deed, moest het opnieuw verstuurd worden. Dat is niet gebeurd.

In een eerder interview met de krant zei Johan Roo-zer, secretaris van de Commissie Monumentenzorg dat het ontwerp niet wordt gedragen door de oud-strijders. Ook is er volgens hem



dWT foto / Jason Leysner Het oorlogsmonument aan de Waterkant, wordt dit jaar nog op-geleverd. De bouw heeft met onderbrekingen meer dan twee jaar

geen associatie met de plek en de Binnenlandse Oorlog. "We pleiten voor een *place* vandaan de mensen zijn vertrokken: het veerplein of Stolkertsijver waar het alleof remembrance. lets met meer waardigheid voor mensen die om het leven zijn gekomen en niet een plek waar straks honden en zwervers tegen aan gaan

plassen."

Volgens de oud-strijders
moet het de plek zijn waar

Stolkertsijver waar het alle-maal begon", zei Roozer. Volgens de Commissie Monumentenzorg brengt Herrenberg de president alleen maar in problemen, omdat de werkwijze niet in overeenstemming is met de wetgeving .-.