



Town Planning Consultants

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The Director
Development Planning & Urban Management
City of Johannesburg

By e-mail: benp@joburg.org.za

Dear Sir,

OBJECTION TO THE SIMULTANEOUS REMOVAL OF RESTRICTIVE CONDITIONS AND REZONING OF ERVEN 519 AND 520 PARKWOOD

I refer to the abovementioned application submitted to the City of Johannesburg Metropolitan Municipality of which notice was given in the Gauteng Provincial Gazette on 10 January 2018.

I act on behalf of the Saxonwold and Parkwood Residents' Association(SAPRA), who object to the application in its current form.

Local Authority Policy

Previous local authority policies, the Regional Spatial Development Framework, the BRT Land Use Guidelines, The Rosebank Urban Development Framework and the Saxonwold and Parkwood Precinct Plan all earmarked the site and surrounds at low intensity uses for either offices or increased residential densities.

The Saxonwold and Parkwood Precinct Plan permitted increased residential density on this site at 80du/ha(3 Storeys) or Offices and Medical Consulting Rooms at an FAR of 0.3(2 Storeys).

However since then there has been a dramatic policy shift through the approval of the Spatial Development Framework, 2040 (SDF) which is now the overriding policy for this portion of Parkwood.

The SDF 2040, broadly applies a minimum residential density of 80du/ha within Regional Nodes such as Rosebank and a similar minimum residential density of 60du/ha within 500m of the Gautrain Station in Rosebank, which are both applicable to this site. A mixture of uses would also be permitted on this site given its location within the Rosebank Regional Node.

Given this policy context, SAPRA as far back as early 2016 obtained permission from the department City Transformation and Spatial Planning to review the existing precinct plan as they were seeking to plan and accommodate for any possible growth within the area. This precinct planning process was put on hold by the aforementioned department in July 2016. During November 2017 the department City Transformation and Spatial Planning finally made their draft precinct planning guidelines available to SAPRA upon which they are now acting by proposing a review to the existing precinct plan.

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Submissions have been made by SAPRA relating to the SDF and Nodal reviews.

This application now seeks to apply SDF 2040 guidelines relating to residential density including a full set of "Business 2" rights.

The relevance of the above is that the Saxonwold and Parkwood Community is a pro-active, positive community seeking to accommodate constructive growth within the area in view of it's unique character, heritage and status within the context of the broader city.

They, through SAPRA, have been seeking to introduce constructive policy guidelines (through a revised precinct plan) for the application site itself and the surrounding area affected.

The application on Erven 519 and 520 Parkwood is seeking rights, which have not been considered in the context of the existing or future planning of the surrounding area. Detailed guidance is required in terms of a review of the precinct plan and most probably an urban design framework similar to the work completed by the local authority in Dunkeld, to the north of the Rosebank Node.

The application should not be considered by the local authority, until such detail has been determined to promote responsible urban planning and a seamless transition in the growth of this part of the city.

SAPRA understands the nature and context of the application but wishes to present detailed planning for this quadrant of Parkwood in consultation with the applicant and all other parties affected.

Application Detail

In addition to the above the following are specific concerns relating to the application at hand:

1. The zoning category "Business 2" caters for a wide variety of uses, which may not be appropriate for the site and the surrounding residential area. The uses applied for should be specified, for instance a car sales lot would not be appropriate in this location, with residential, offices and limited retail being more appropriate.
2. The mixture of uses should be specified - the predominant use should be residential, with a limit placed on the size and location of the non-residential uses. Parameters should be established to ensure the construction of the full mixture of uses i.e. to prohibit the non-residential component to exist without the residential being constructed as well.
3. The height of the building at 15 Storeys is excessive. A building scaling down from the Standard Bank Building, considering the surrounding urban form, may be more appropriate, similar to the height obtained in the Barrow development across Oxford Road at 6 Storeys in height.
4. The residential density should be specified in view of promoting accurate planning for engineering services and the surrounding road network.
5. Indications should be given as to how the development will comply with the Urban Design Guidelines contained in the SDF. The Site Development Plan should be referred to the Urban Design Advisory Committee to ensure the aforementioned compliance. An example hereof would be to restrict basements above the ground floor level and ensure street access to the non-residential uses.
6. No detailed engineering services or traffic impact information has been provided.

Kindly consider the above objection/representation. SAPRA reserves the right to expand upon the above, particularly once the relevant studies are available and at a possible future hearing.

SAPRA remains open to further consultation and will continue to proactively seek a solution for the development of the site.

I trust this meets with your approval and should you require any additional information, please do not hesitate to contact me.

Yours faithfully,



Craig Pretorius
URBAN TERRAIN

cc. Raven Town Planners
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