



24 April 2023

Development Planning  
PO Box 30733  
Braamfontein  
2017

Email to: [objectionsplanning@joburg.org.za](mailto:objectionsplanning@joburg.org.za)

Dear Sir/Madam,

**OBJECTION: APPLICATION FOR REZONING FROM RESIDENTIAL 1 TO RESIDENTIAL 3 TO PERMIT 80 DWELLING UNITS/HA: ERF 192 PARKWOOD**

SAPRA is a residents association serving Parkwood and Saxonwold. It seeks to promote the retention of the qualities and appeal of these predominantly residential townships and the planned and sustainable densification of the area.

The applicant's site is at 27 Glamorgan Road, two erven south of Chester Road, and is adjoined by single dwelling houses. It is zoned Residential 1 is described by the applicant as developed with a dwelling house "and there are 5 units at the property." It is not clear whether this is accurate.

There is a title deed restriction (see applicant's motivation section 2.5) that limits the development on the site to one dwelling house. It is noted that the application excludes the removal of this restriction, even though this would preclude the exercise of the proposed zoning rights. This would appear to be an oversight/error by the applicant.

The motivation under section 4 of the motivation suggests that densification is beneficial to the City and that the "site is close proximity to numerous former Residential 1 properties that have been rezoned to higher densities". This claim is not aligned to the limited land use and development information provided.

It is also mentioned that a "large portion of the property is vacant with many trees; this can be a hiding place for criminals." This seems to have little relevance to the site, nor does the reference to the site's "close proximity to Malibongwe Drive", and the later reference in 4.2.1 to a location on Dover Road.

The derivation of the development controls, particularly the coverage of 80%, height of 3 storeys, and FAR of 1,2 (ie a floor area of 1 204m<sup>2</sup>) is not explained, nor is the statement that "the impact on the surrounding neighbourhood will be

minimal". The applicant's further suggestion that the site development plan will help reduce "any negative impact" is both unmotivated and unlikely.

The applicant's motivation for higher density would seem reliant on the designation of the site and surroundings as part of the Rosebank Metropolitan Node. This guideline should not be interpreted literally, and requires site-specific and contextual information which is not provided in the application.

From SAPRA's perspective, one of the major concerns is the applicant's assumption that the existing infrastructure in the area, designed for 10du/ha, will be able to cope with an 8-fold increase in density on the site and on all the other similarly designated erven within this part of the Node. There has been no service assessment undertaken to evaluate the condition and capacity of services in the area, and neither has the applicant provided any information to substantiate its claim about the adequacy of such services.

To conclude, the motivation is haphazard and often uncoupled from the location and circumstances on the application site, and has not shown that the application is needed, reasonable, desirable, and in the public interest.

We reserve our rights to augment our initial objections when the application is heard by the Municipal Planning Tribunal.

Yours faithfully,

MARCELLE RAVID  
SAPRA Secretary  
0843550826  
SAPRA [info@sapra.org.za](mailto:info@sapra.org.za)

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