



25 October 2022

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 BUSINESS 1 TO BUSINESS 1 TO INCREASE THE HEIGHT, FLOOR AREA AND COVERAGE (INCLUDING REMOVAL OF RESTRICTIONS): ERVEN 306 TO 309 PARKWOOD**

SAPRA is a residents association acting on behalf of the residents of Parkwood and Saxonwold.

The Association supports developmental change in the area, provided that the changes are clearly set out, part of a coordinated and planned approach, and not detrimental to the general area.

The application was advertised on 28 September 2022, and is for additional zoning rights to further develop the notorally-tied erven comprising the site. The current development on the 4 024m<sup>2</sup> site is described as a five-storey structure, with the street level on Jan Smuts Avenue used for a public garage and the floors above for offices. The site is linked to erf 991 Parkwood for additional parking purposes. There are no details of the current floor area, parking, etc in the application, nor any indication of the future built form that would result from the proposed new zoning rights. There are certain conditions of title that the application seeks to remove.

Sapra's preliminary objections are set out below:

The application is based on the designation of part of the site as included in the Rosebank Metropolitan Node in terms of the Nodal Review, and claimed compliance with the development guidelines that accompany that nodal designation. It has been assumed in the application that the General Urban Zone to the east of the site will be developed at 5-storeys. It is Sapra's view that this generic submission must also address the aspects of built form and compatibility, both key considerations in the

Nodal Review and the SDF. This would help both Sapra, and the City. As matters stand the appraisal of the application is hampered by the lack of a site analysis and illustration that shows how the proposed zoning controls were derived.

It is also not clear from the application what the state of infrastructure serving the site and surrounds is, and what the traffic and parking implications may be. It is a continuing concern for Sapra that there is no master planning for services and public facility upgrades that ties in to an area-specific spatial planning framework for this peripheral part of the Node. The current IDP and SDF both suggest that it is impractical and unaffordable to address these servicing requirements and that a plan of incremental delivery is required for priority development area, such as nodes.

In general, Sapra is of the view that the application in its current form does not meet the purpose of achieving “coordinated and harmonious development of the area to which the application relates” as set out in Section 5(4) of the Municipal Planning Bylaw 2016.

In summary, Sapra is concerned that the implications of the proposed development of an 18 108m<sup>2</sup> building have not been adequately explained and that it objects to the application in its current form. It reiterates the need for adequate spatial framework guidance where substantial changes to the existing built environment are proposed.

Sapra reserves its rights to augment the preliminary objections and arguments when more information becomes available and when the application is heard by the Municipal Planning Tribunal.

Yours faithfully,

MARCELLE RAVID  
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