



21 January 2022

Development Planning
PO Box 30733
Braamfontein
2017

Email to: objectionsplanning@joburg.org.za

Dear Sir/Madam,

Objection: Rezoning: Erf 988 Parkwood

We have lodged earlier objections in response to two recent applications on the site. We are advised by the applicant's agent that these applications have been superseded by the current one for a storage facility and our further comments are in response to the current application.

As expressed in our comments on the earlier applications, the idea of land use change and a new building on the site is generally accepted; however, it is not clear whether the proposed storage use and the building scale and typology will be appropriate, functional and compatible with the existing buildings and surroundings.

The application proposes a 4-storey building of $\pm 7\ 800\text{m}^2$. This is a significantly larger building than currently permitted in terms of the zoning, but there is no illustrative site development plan submitted with the application that would show how the building would fit onto the site. Neither is there any meaningful analysis of local context or illustration of how compatibility with that context can be achieved, and particularly how access to the site on Jan Smuts Avenue is proposed.

The generic comments on the adequacy of infrastructure and the traffic implications are not substantiated by any local data or studies, and one would expect, at a minimum, that an access study would have been conducted for a use reliant on the dropping off and collection of goods for storage. The likelihood of direct access from Jan Smuts Avenue is slim, and the sanitary lane on the western edge of the site is barely adequate for a single lane.

SAPRA is in favour of planned change, but there is currently little local planning guidance on how the changes to the Jan Smuts Avenue interface with the rest of the neighbourhood should evolve. The inclusion of the site in the Rosebank

Metropolitan Node in terms of the Nodal Review and the need to interpret the related development and urban form guidelines calls for a nodal or local precinct plan. This must be based on a proper analysis of the context and, as required in the City's Procedure Document: Preparation of Precinct Plans, the development of built form guidance that informs development controls "to guide individual site application and development." It should also include an implementation plan addressing the infrastructural and public realm needs. In the absence of such local planning guidance, the provisions of S5(4) of the Bylaw should be applied to ensure a compatible outcome.

In its present form, the application is not a "complete application" as required in the Bylaw, and must be augmented by additional information on built form, infrastructure and traffic to allow for an informed response from SAPRA. In the interim, we will pursue our objection more fully and reserve the right to augment our arguments at a Tribunal hearing in due course.

Kindly acknowledge receipt hereof.

Yours faithfully,

MARCELLE RAVID
SAPRA Secretary
0843550826
SAPRA info@sapra.org.za

Cc 1. KiPD saskia@kipd.co.za

2. VBH Town Planning vbh@vbhplan.com