



Chairperson: H Koekemoer  
hanneskoekemoer@proton.me

Secretary: HC Eggers  
076-785-3514 heggers@pm.me

P.O. Box 3218, 7602 Matieland  
11 Grandiceps Rd, 7600 Stellenbosch

Public Benefit Organisation No. 930049434  
fsmountain.org

**FRIENDS OF STELLENBOSCH MOUNTAIN**

## **Comments on the Local Spatial Development Framework and Development Guidelines of the proposed Adam Tas Corridor development (Sept 2021)**

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### **1 Commendation**

- 1.1. The ATC and its associated Local Spatial Development Framework (LSDF) is a milestone in the history of Stellenbosch town planning. If implemented consistently and faithfully (and that is a big if, given past history), the ATC will go a long way towards alleviating injustices of the past and creating a second town core which addresses the imperatives and opportunities of the 21st century within the Stellenbosch municipal area.
- 1.2. The ATC proposal is also highly commended for its core motivation of bringing together communities and for acting as core and seed for sustainable development, and thereby changing the discourse from the usual self-serving and narrow focuses of individual land owner development proposals to the big picture of common welfare and sustainability. Of all the private plans submitted in the past two decades, this ATC proposal comes closest to fulfilling the intentions and thrust of spatial legislation and the principles which Stellenbosch Spatial Development Frameworks have often espoused, but seldom satisfied.
- 1.3. To temper our enthusiasm with some realism, it is clear enough that the ATC proposal will not be popular with various sectors of society whose aim is quick self-enrichment and short-sighted goals. The ATC will have to be protected from various attempts to undermine it. This could happen either by direct changes to its core development parameters and principles, or by parallel development proposals and approvals which weaken or even annul the central role of the new town centre in favour of the usual uncontrolled urban sprawl patterns.
- 1.4. While FSM cannot comment in depth on the ATC Development Guidelines, a quick perusal shows impressive attention to detail and to integration.
- 1.5. We are glad to see that even in its earliest implementation phase, the LSDF proposes such short-term measures as will in the long run aid, rather than hinder or sabotage, the strategic goals. A good example is the proposed alignment of the signalled crossings along the R44 between the Dorp Street and the Merriman Rd intersections as well as the elimination of the level crossing of Plankenbrug Road (see LSDF Table 25). These are obvious and relatively quick interventions which cannot be implemented soon enough. More on that below.

## 2 Context: the 30-year planning horizon

- 2.1. ATC planning has clearly already been done in much detail, and so the question is what, if any, role any public comments can still play at this late stage. Some detailed comments do appear below. It is nevertheless worthwhile to explicitly highlight the background and context within which the ATC is being designed and the strategic goals to which it should contribute.
- 2.2. The time frame for the ATC and its consequences, as much as for the MSDF and CITP, is that of decades, not just the few years to the next election or job appointment. Short-term considerations will play their role, but they must be subordinated to the near-certainties which await Stellenbosch and the world in the coming three decades.
- 2.3. Here are some near-certainties which must determine development in general and the ATC in particular, given its seminal role:
  - (a) **Climate change and ecosystem collapse:** for Stellenbosch, these imply more frequent and intense droughts, water shortages and resulting over-utilisation of ground water (also by City of Cape Town), rising temperatures, lower agricultural yields, high and rising risk of uncontrolled fires;
  - (b) **economic stagnation or recession**, coupled with inflationary pressures especially on food and energy, along with underspending on critical **protection of nature areas**;
  - (c) a fast and irreversible **rise in fossil fuel costs** and thereby a crisis of the current fossil-fuel-based mobility model (roads and private vehicles);
  - (d) disproportionately high **impacts on the poorer communities** and resulting **social instability** due to the above plus low skills levels and employment;
  - (e) the inevitable and highly desirable large-scale transition from centralised fossil-fuel and nuclear electric power distribution (Eskom) to local and even household **electric co-generation**;
  - (f) limited upside scope for alleviation and improvements based on **technology**: new machines, information, data and clever management can alleviate physical problems and large-scale secular trends only to a limited degree.
- 2.4. Inevitable consequences include:
  - (a) Sustainable mobility and public transport will and must be at the centre of long-term planning, along with land use, energy and nature conservation.
  - (b) Private vehicle use and road construction will be downscaled, voluntarily or involuntarily, in favour of infrastructure which reflects the above realities.
  - (c) Water will become scarcer; its cost will rise, and water resources will have to be subjected to centralised control.
  - (d) Compact urban forms rather than urban sprawl are not just desirable but inevitable.

## 3 Adam Tas Corridor, master plans, and other developments

- 3.1. As the largest and most significant development in Stellenbosch for decades, the ATC will have a large impact on town planning and infrastructure in general throughout WC24. This means that, starting in 2022/23, all master plans have to be re-written so as to take the central role of the ATC and its principles into account.
- 3.2. Specifically, the Stellenbosch Integrated Development Plan, its Municipal Spatial Development Plan and the new Comprehensive Integrated Transport Plan will all have to be rewritten in such a way that its central character of the ATC in terms of mobility and housing is taken as the starting point for planning and ranking of projects elsewhere in the municipal area.

- 3.3. **The Adam Tas Corridor development as a seminal restructuring can only work if the same principles of sustainability are applied and enforced on all future developments, not just on the ATC precincts.** The ATC development and its principles will only work if the entire current municipal planning and land use patterns and decisions change course in parallel.
- 3.4. It is well known that Stellenbosch Municipality is inundated by rural land owners and investment capital seeking gated estates, specialty and lifestyle developments etc. which do not comply with SPLUMA, housing and transport legislation and strategies. Examples include the recent Capitec parking garage, various land units owned by Blaauwklippen Agricultural Estates, the remainder of Brandwacht Farm, Libertas and Fleurbaix, Longlands, African Valley etc. Approval of the ATC should simultaneously imply rejection of such proposals. Under no circumstances can ATC approval be cast as a new era of free-for-all uncontrolled development.
- 3.5. Likewise, application of the correct principles to mobility within the ATC mean that those same principles must be applied to proposed nonsustainable roadbuilding proposals. Specifically, once the important and legitimate upgrading of the central road system (mainly Adam Tas Road, R44, George Blake Road and the northern part of the R304) has been accomplished, thereby the alternative bypass plans through Devon Valley and Brandwacht should also be scrapped, along with similar unnecessary infrastructure spending.
- 3.6. A new CITP should be compiled which starts from the central mobility backbone about to be established within the ATC initiative. In the course of doing so, the Roads Master Plan should be consigned to the dustbin, i.e. deproclaimed by Council, and any remaining viable roadbuilding proposals considered and motivated from within the CITP and ATC core strategy itself.
- 3.7. In addition, the Section 78(3) Report on provision of bulk parking as approved by Council on 28 February 2020 needs to be scrapped since it is incompatible with the mobility hierarchy about to be established by the ATC LSDF. Instead, the new CITP needs to reconsider parking based on the future existence of a light rail system along the ATC and allocate appropriate park-and-ride precincts in close proximity to the existing and future rail stations.
- 3.8. The CITP needs to follow the direction set Table 35 of the LSDF whereby *A lesser parking requirement can lower development costs and also contributes to other project aims such as promoting NMT* (Page 114). Likewise, parking in the current Central Business and university districts should be throttled in favour of a high-frequency service from the CBD and Bergzicht to the Bergkelder main modal interchange.

#### 4 Incomplete information

- 4.1. The LSDF as made available on the municipal website omitted the Appendices, which appear only in the Table of Contents. The contents of Appendices E, F and H would be of particular interest within the focus of these FSM comments. There may also well be detail plans which were not included at all. It is impossible to determine if the present comments duplicate or contradict any of these existing documents.
- 4.2. We request that the missing appendices be made available, preferably in PDF format, along with high-resolution versions of the maps. Thank you.
- 4.3. Also the present PDF versions of the 2021 LSDF are formatted as images and cannot be searched. That should be rectified by re-saving the entire document not as a set of images but as proper PDF.

## 5 The Core

- 5.1. Collectively, the ATC Precincts 6 and 7 (Bosman's Crossing and Bergkelder) will become the cornerstone or simply **The Core**, not just of the central area, but of the entire municipality's mobility and spatial strategy. This cornerstone must be designed and built with a view to its municipality-wide core function, not just local considerations or to suit local landowners. We laud the prioritisation of this area as set out in Table 12 of the LSDF and elsewhere. It is all the more important that detailed planning for this area be completed before the first lead project is even begun.
- 5.2. **Space is very limited.** Precincts 6 and 7 are permanently hemmed in on their western side by the Papegaaiberg Nature Reserve (see Section 9) and the railways and R44/Adam Tas on the south and east. The Core must simultaneously serve multiple crucial functions all within a small footprint, and therefore requires very careful design as well as a priori integration of future elements which may not be built in Phase 1 but later.
- 5.3. The current **Stellenbosch railway station** is dysfunctional, the station building at best of historical interest, and its siting is unsuitable in relation to the Link to the central CBD (see *The Link* below). A new central railway station should be constructed in the northern part of Precinct 7 or in the southern tip of Precinct 9, opposite the current van der Stel sports grounds, immediately to the west of the R44/Merriman T-junction. Whatever the exact location of the new central station, we suggest that it is crucial to incorporate the southern tip of Precinct 9 into Precinct 7 to align the goals within this tip with those of the Core.
- 5.4. From the start, the station should be integrated with the other **modal interchange and traffic functions** all coming together in the Core, including
  - (a) the station itself,
  - (b) a public transport node (buses, taxis, later tram or light rail) to connect to Bergzicht via Merriman and to northern and southern destinations along the R44 and R304,
  - (c) the NMT link via du Toit Street to Victoria Street,
  - (d) a new single-lane arterial road directly linking Adam Tas to George Blake west of the railway line, possibly underground in parts,
  - (e) appropriate commercial retail space around these functions, easily accessible to rail and public transport commuters, and
  - (f) the transition zone between high-density urban development and the Plankenbrug River and Papegaaiberg Nature Reserve immediately to the west.
  - (g) Note that parking is not a primary function of this core; park-and-ride sites on the periphery fulfil that role.
- 5.5. No effort and cost should be spared to modernise and align the road network in Precincts 6 and 7 so as to achieve the above integrated core functions while accommodating the continuing need for road traffic:
  - (a) **Central bypass:** Rather than wasting billions on new bypass roads through Devon Valley and Brandwacht, a new *Central Bypass* road between the railway line and Papegaaiberg should directly link Adam Tas Rd to George Blake Rd with none or maximally one interchange (to Merriman, see below). This new road section would be less than 2km long and could be taken underground if necessary. The costs of this 2km section will certainly be far lower than the proposed Western Bypass and it would site the benefits where they would be felt most, the space of highest congestion.
  - (b) The existing trajectories of Adam Tas and R44 along this same 2 kilometre section east of the railways would be kept, but converted to a **local distributor** to serve the central

station and eastward access into the current Stellenbosch CBD. It would of course have to fit into the overall concept of the new central modal interchange at or near the new railway station, including a bus terminal, shopping, housing, education needs etc.

- (c) Within this concept, the designation of the R44/Merriman T-junction as a *Vehicle Orientated Crossing* (see Figure 20) is supported only if and to the degree that this intersection is subordinated to, and completely integrated with, the core rail and modal interchange functions of the new railway station and modal interchange. The preferred solution would be to extend one lane of Merriman in each direction over or under the railway lines to link into the new Central Bypass on the western side. If that is impossible, it may be necessary to use the north-west corner of van der Stel to divert Merriman road traffic away from the station and modal interchange. See also Item 7.1 below.
- (d) It speaks for itself that pedestrian and NMT needs must be fully satisfied by various mechanisms such as overpasses and the style elements already set out in the Development Guidelines. It must be easy to cross the entire Core area from west to east on foot or by bicycle, from Bosman's Crossing to van der Stel, from Kayamandi to Cloeteville etc. For this reason, the proposed NMT corridor should also be extended westwards towards Oude Libertas.
- (e) In terms of infrastructure spending, the municipal budget and all grants obtained should be re-aligned to spend at least 50 percent of available funds on the modal interchanges and NMT and pedestrian infrastructure. The current imbalance of 90 to 99 percent spending going towards road projects must come to a rapid end.

5.6. Considering the multiple crucial functions to be fulfilled by Precincts 6 and 7, in terms of transport and modal interchanges, we do not support the establishment of a secondary school on the Bergkelder premises as suggested in Table 25 of the LSDF (Page 98). As set out above, land in the Core is scarce, and Core mobility functions must have priority. It would also definitely be a more relaxing environment for scholars and schooling to not be hemmed in by the envisaged multiple rail, road, public transport and shopping neighbours with all their noise and pollution, as would inevitably be the case if the school were sited on Precinct 7. Hence we strongly suggest that the suggested school be established within Precinct 8 (van der Stel) on the eastern side of the Core rather than on the Bergkelder terrain. The necessary land swap between Distell and the Municipality seems relatively uncomplicated and would yield permanent benefits for all.

## 6 The Link

6.1. Precinct 8 (van der Stel) is **The Link** between Precincts 6 and 7 (the Core) and the existing Stellenbosch CBD and Bergzicht modal interchange. Its Character/Identity as per Page 51 of the LSDF is therefore supported in general, but with three modifications:

- (a) As already stated, we would recommend siting a secondary school within van der Stel rather than at Bergkelder, to be made accessible via generous pedestrian and NMT links across the Core as described.
- (b) If required to complete a successful design of the Core, a small part of the van der Stel area may have to be re-allocated to support that design, eg by road realignments.
- (c) It will be important to reserve land along a narrow strip parallel to the existing Merriman carriageway for the long-term purpose of stronger public transport links between the Core and the current CBD.

6.2. NMT backbone: the central east-west backbone for NMT traffic from the R44 via du Toit Street through to Victoria Street (eg shown in Figure 3 and 14) is well conceived and strongly supported.

6.3. In parallel to this NMT axis, there needs to be a parallel public transport east-west axis (not immediately, but in a later phase) along Merriman Ave linking the new central railway station and future ATC and van der Stel developments to the existing Bergzicht terrain. This public transport link is crucial in that it would form part of the strategy to reduce private vehicle traffic into the CBD and university: motorists from outside Stellenbosch would park on the western periphery near the sawmills and ride all the way in to Bergzicht and further eastwards.

## 7 Relationship to global spatial functions

7.1. Due to the central importance and limited land availability of the Core, the triangular area bordered by the R44, Adam Tas and western Dorp Street should be incorporated into the ATC. If, as planned, western Dorp Street is to be dualled between the R44 and Adam Tas, those road links and intersections should be pre-designed to integrate with the above north-south road upgrades around van der Stel and Merriman.

7.2. The establishment of two additional railway stations at Droë Dyke and Kayamandi, and the upgrading of the existing Du Toit station, are strongly supported. They have crucial functions as feeders to the core in Precincts 6 and 7 and as natural sites for park-and-ride schemes keeping motor vehicles out of the town centre.

7.3. In particular, Precinct 2 between Onderpapegaaiberg and the R210 (Adam Tas Road) will fulfil important support functions on the western periphery to ensure the long-term success of the Core. Land needs to be allocated or at least reserved for park-and-ride schemes close to the new station around Droë Dyke. Perhaps the optimal way would be to site parking for an existing or new shopping centre in Precincts 1 or 2 as close as possible to the new Droë Dyke railway station and to dual-use this parking for a park-and-ride scheme into the Core.

7.4. While much focus may currently fall on the improvement of the road network in and around the Core, we must never lose sight of the fact that current road usage patterns are unsustainable, that Stellenbosch will have to make major progress towards Travel Demand Management, including raising the private vehicle occupancy ratio by non-engineering measures. Current road traffic congestion is not and may not be the yardstick by which ATC and the central hub should be planned and built.

## 8 Fixing development parameters for the long term

Given the cornerstone character of the ATC, its LSDF should be used to set and fix development and land use parameters also for the long term and in the wider context.

### 8.1. Reservation of land:

- (a) reserving a 10-kilometre land strip immediately adjacent to the present railway line with a view to a possible second rail track, as envisaged in Section 6.5.4 of the LSDF,
- (b) Land for a dedicated public transport link between Stellenbosch Station and the Bergzicht modal interchange. This could come in the form of strips of land parallel to the existing Merriman Road and immediately east along Adam Tas Road between the Adam Tas/R44 and the Merriman/R44 crossings. Such strips could initially be used for dedicated bus/taxi lanes but later evolve into a light rail system extension.

8.2. The mechanisms for long-term change in land use patterns towards scenario-compliant ones include

- (a) purchase of parcels where this can be afforded, or possible land swap deals,

- (b) creation of specific zones (as introduced by the Integrated Zoning Scheme) on strategic land units within the MSDF and associated Zoning Maps which contain strong restrictions/disincentives for incorrect land use and correspondingly strong incentives for sustainable land use which aligns with the long-term vision. Appropriate zonings include *Transport Facilities Zone* (Chapter 12 of the Zoning Scheme By-Law of 2019), *Public Road and Parking* (Chapter 17), and, where no other mechanism will effect the desired changes, new and bespoke Overlay Zones within Chapters 23, 27 to accommodate, for example, overlays between primary transport functions and commercial activities at and around modal interchanges.
- (c) These new zonings may imply changes in existing zonings eg the westernmost parts of URCO01. We note that the missing LSDF Appendix F could be thinking along these lines, but its contents are currently unavailable.

8.3. Regarding **institutional arrangements**, we are satisfied and supportive of the general thrust of having ATC governing structures established and empowered. In addition to those, however, it is crucial that a **local transport regulatory authority** must be established, empowered and integrated from the start. Such transport authority would focus not only on the ATC Core and its modal interchanges, but on implementation of both infrastructural and behavioural components of the municipality-wide CITP. This *Stellenbosch Local Transport Authority* would also take control of and regulate the minibus taxi industry and the liaison with regional and national transport authorities.

## 9 Papegaaiberg Nature Reserve

- 9.1. The Papegaaiberg Nature Reserve is a *Protected Area* declared in terms of the Protected Areas Act. It is qualitatively different from all 10 other precincts in almost all respects. It is good and helpful to include this nature reserve in planning, but in many ways it cannot and should not be integrated into the overall ATC concept. Unless the differences set out below are incorporated and clearly set out in a revised LSDF, the Papegaaiberg Nature Reserve should not even be referred to as a “Precinct”. It is factually not part of the Adam Tas Corridor but rather abuts it.
- 9.2. Nature and natural processes function by different laws than human ones. It would be irresponsible and dangerous to apply normal human needs and urban development criteria to it. On the contrary, there has to be a conscious awareness that it is not the business of ATC to take over planning and management of the Papegaaiberg Nature Reserve. Of course co-operation and co-ordination is highly desirable, but not control or excessive influence. The appropriate authorities are Cape Nature and the Stellenbosch Municipality nature conservation section.
- 9.3. In addition to its Protected Area status, most of the Papegaaiberg Nature Reserve has been declared a *Critical Biodiversity Area* in terms of the NEMA Biodiversity Act. This legal term has as basis a botanical assessment of the ecosystem, in this case mostly renosterveld, which as an ecosystem is critically endangered as just a few percent of the original footprint are still in their natural state.
- 9.4. Chapter 4 of the Protected Areas Act sets out in detail the management of such areas, including management authorities, supervision, access, activity restrictions etc. These and the associated regulations are statutory requirements and not optional. Likewise, areas declared in terms of the Biodiversity Act are subject to a range of laws and regulations.
- 9.5. **The purpose of Papegaaiberg Nature Reserve is *rehabilitation and conservation of a critically endangered ecosystem* (Section 17 of the Protected Areas Act). This implies that the description of Precinct 11 on Page 51 of the LSDF should be rewritten.**

The primary function of the nature reserve is neither “recreational”, nor it is a “park”, and its primary purpose is not to link into existing or future walking or cycling routes. References on Page 51 to “park”, “sensitively developed” etc may be well-intentioned, but they would open the door to redefinition – in terms of human ideas and processes – of what is essentially a conservation area. They should be deleted.

- 9.6. The description on Page 74 of the LSDF is also quite inappropriate. The nature reserve is not, as currently described, an “open space system”. Of course the nature area is an important heritage, but not in the same way as old buildings or historical sites. The essence of its heritage value lies in its unique flora, extremely high biodiversity, and endangered status.

Page 74 should remove the current management goals and comments in Column 3 (*Heritage Indicators*) altogether, and instead make explicit reference to the existing and future obligatory Environmental Management Plan for the area as well as the over-arching legislation and the Stellenbosch Environmental Management Framework (SEMF). **Papegaaiberg is not a recreational park or a proto-arboretum or nascent cultural venue or theme park.** It is a nature area and it has its own management plans.

- 9.7. Likewise, Paragraphs 3 and 4 of Section 6.4.11 on Page 75 of the LSDF are misguided, factually incorrect, misleading and in contravention to existing legislation, the SEMF and the Papegaaiberg Environmental Management Plan being prepared.

- 9.8. The points we make here are supported by the existing zoning of the area. Papegaaiberg is not zoned as *Public Open Space*, the zoning applying to ordinary urban parks (*cf* Chapter 18 of the Integrated Zoning Scheme By-law) but as a *Natural Environment Zone* (Chapter 21 of the IZS). The ATC must take the provisions of Chapter 21 of the IZS into account if and when any planning involves the Papegaaiberg Nature Area. Figure 27 on Page 103 of the LSDF correctly distinguishes between Open Space and Protected Areas.

- 9.9. The recommendation on Page 102 that **Environmental Authorisations** within the ATC should lump both the Papegaaiberg nature area with other such environmental authorisation applications is not supported and is probably unlawful anyway. Again, the point is that the nature area may not be considered merely an extension of the ATC but is subject to quite different physical and legal processes and constraints.

- 9.10. To rectify what is obviously a common misconception as to the nature of nature, a great deal of thought and effort must go not so much into *integration* but rather into *synergetic co-existence* of the nature area from the immediately adjacent high-density developments about to take place without having to fence or wall the nature area. On the contrary, the ATC should make an effort towards finding a scheme where the established and required goals and processes of the environmental legislation and the local Environmental Management Plan are supported and subsidised both financially and institutionally.

- 9.11. It speaks for itself that the **Plankenbrug River** forms a critical component of the Papegaaiberg Nature Reserve and its natural processes. The problems associated with the river are well known and will have to be addressed (Page 75 of the LSDF). Nonetheless, the *core function* of the Plankenbrug River is also not one of recreation or horticulture, but of basic natural processes.

- 9.12. **Ecological corridors** are, of course, supported by FSM. It seems unrealistic, however, to try to establish true ecological corridors along the planned Core-du-Toit-Street-Victoria-Street axis as it traverses the CBD. A more promising corridor would run east-west along the Eerste River as well as the Kromrivier.