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RE: Adam Tas Corridor Public Participation – Feedback from TV3 Architects and Town Planners (Pty) Ltd

Thank you for the opportunity to participate in the review of the draft ATC document. Herewith follows our comments and queries.

The draft ATC report states, that it is possible to achieve a development of some 3 000 000m<sup>2</sup> bulk, including 13 500 housing opportunities and that bulk infrastructure required to service the development can be provided. However, no impact assessments or correspondence from government departments are provided to support these claims. For this reason, the following questions are asked:

1. Has a macro Transport Impact Assessment (TIA) been undertaken for the ATC project (which is supported by the Provincial Roads Engineer)? Is there any indication of which roads will be upgraded and what are the expected timelines? Similarly, given the congestion currently experienced along the Adam Tas Corridor, its traffic intersections and main feeder routes – will additional access points and links be created? This will impact the planning of future developments.
2. The proposed bulk as outlined in the draft ATC will require extensive parking allocations if developed in line with existing zoning scheme regulations. The spatial implication of these parking requirements contradicts the spatial principles of the ATC proposal. During the online public participation meeting, it was indicated that this will be dealt with by instating special overlay zones. How will this be dealt with in the interim since the requirement for increased bulk will be applied before the creation of the new overlay zones? Will private developers receive additional parking concessions if they built additional NMT infrastructure?

3. Has the Passenger Rail Agency of South Africa (PRASA) commented on the ATC project? Do they support the ATC project, and does it align with their planning for the rail system in Stellenbosch?  
Is there an opportunity for alternative rail/ transport services to be contracted to private vendors, and has this idea been tested with PRASA? Will other stakeholders be permitted to construct rail crossings to promote NMT accessibility?
4. In their master planning, did the Stellenbosch Municipality's engineering department make provision to provide additional bulk infrastructure (roads, water, sewerage and electricity) for the proposed 3 000 000m<sup>2</sup> bulk? Is there a plan for what upgrades are anticipated and the related phasing of these projects? Is there a stormwater master plan that identifies the potential for larger attenuation areas (as opposed to relying on site-by-site solutions only)?
5. Has an extensive Heritage Impact Assessment (HIA) been undertaken (which is supported by Heritage Western Cape) as the ATC project will have a major impact on the Stellenbosch historic core? Likewise, is there a visual impact study to determine key design parameters for the proposed developments?
6. What are the ATC's plans for developable land located on the ATC, but excluded from the ATC, such as:
  - Du Toit Street area (south of Precinct 8);
  - Kayamandi town centre (south of Precinct 10); and
  - Municipal Farms No. 183, 183/5 and 183/23, Stellenbosch (west of Precinct 10).
  - PRASA properties
7. May the ATC report enforce the provision of inclusionary and affordable housing in new developments? If so, then what are the requirements?
8. May officials use the draft ATC report's recommendations as a formal municipal policy?
9. With regards to the proposed bulk requirements as per the draft ATC document, will land owners be obliged to take up the maximum bulk allocated to each site? Will bulk contributions be calculated on the maximum bulk allowance, regardless of whether this bulk is developed?
10. What would constitute public open space and how does this impact the distribution of bulk per precinct as allocated in the draft ATC?
11. Is there an opportunity for public-private partnerships for the design and implementation of new NMT routes?
12. Scenario Question:  
What happens when the ATC LSDF requires a minimum commercial bulk or number and type of residential units for a specific site but owing to actual constraints (e.g. topography, heritage considerations, geotechnical issues, etc.) the proposed development cannot comply with the ATC LSDF's requirements?

For example, at the Newinbosch development, the ATC LSDF required a minimum number of residential units for the affordable housing market. A 3-storey apartment building with surface parking is an affordable building that can provide affordable housing opportunities, but to comply with the ATC LSDF's requirements the developer needs to construct a 5-storey high apartment building with basement parking and a lift. Suddenly –to comply – the affordable housing apartment building has become too expensive and the project's economic viability has been undermined.

So, what happens when a proposed development cannot comply with the ATC LSDF's development requirements? Does the ATC LSDF make provision for such a case scenario or must the ATC LSDF's development requirements be adhered to at all costs?

Thank you for your consideration. We welcome your feedback.

Kind regards,

TV3 Architects and Town Planners (Pty) Ltd.