
FRIENDS OF STELLENBOSCH MOUNTAIN



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Comments on the Draft First Amendment of the 4th Generation Draft Integrated Development Plan 2017-22

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1. **Good work:** A new Chapter 4 entitled “Spatial Development Framework” has been inserted which in part reflects the 2019 MSDF draft rather than the outdated sections in the May 2019 IDP’s Chapter 6 which was incompatible with the new 4th generation (draft) MSDF. The change appears to follow criticism submitted by FSM in the previous round. The inclusion of the new Chapter 4 is indeed a good development and we thank the Municipality for this update. The Stellenbosch IDP document is already quite good and probably better than most others in the country.
2. **Finish the job:** Unfortunately, the amended IDP still contains in Sections 7.3.1 and 7.3.2 outdated text pertaining to the outdated 2018 IDP. At best, these sections duplicate what is now contained in the new Chapter 4, but in part they even contradict the text in Chapter 4. *Sections 7.3.1 and 7.3.2 in the Draft First Amendment should therefore be deleted altogether and any important maps which do not already appear in Chapter 4 should be moved there.*
3. **The CITP again, now with the ATC**
 - (a) **All versions of the IDP so far are incomplete and deficient since they do not contain a fully developed and implemented CITP.** Along with the MSDF and SEMF, the CITP is a top-level municipal planning instrument which should guide and govern the entire macro-structure.
 - (b) On Section 4.15.1 **Adam Tas Corridor (ATC):** The Adam Tas Corridor initiative is without doubt a game changer regarding development. Whether that game changer is for the better or worse depends critically on the IDP and the CITP and not the other way around. The Corridor area with its critical rail, modal interchange and arterial road components must naturally form a central component of the CITP. However, under no circumstances may a narrow ATC-driven focus and ATC-local criteria determine the CITP and thereby the IDP. On the contrary, the CITP, MSDF and IDP should *comprehensively* consider the municipality-wide transport situation, and from that comprehensive viewpoint inform the core spatial and transit/mobility components of the ATC.
 - (c) Given the urgency of this, the coverage of the Comprehensive Integrated Transport Plan (CITP) in the current and previous versions of the IDP is embarrassing or worse. We

have had various CITP versions for at least eight years, first in draft form in 2011, followed by an update in 2013 and a much watered-down 2016 version. Very little has been implemented. Following the inclusion of the ATC into the new IDP, even the most recent unreleased CITP draft is already obsolete. **A new CITP should be compiled and promulgated with the utmost urgency, taking into account threats and opportunities of the ATC and taking into account not the Roads Master Plan but the actual legislation.**

- (d) We understand that such a new CITP will not be available immediately. Hence the current IDP must for the moment remain reduced to a statement of principles and aspirations.
- (e) Even so, the rank of the CITP as a major planning instrument can and must be properly recognised, and it should appear in Chapter 4 or as a separate chapter and not (as is currently the case) relegated to a subsection within the chapter entitled *Legacy Projects and Service Delivery Implementation Plans*.
- (f) Pages 245-246 of the draft amended IDP (Budget) reflect the same disregard: the CITP is far underfunded. The Roads Master Plan (page 246) is still budgeted to receive R1million per year for 3 years. Funding of the RMP and any roads/transport planning separate from the CITP cannot be justified, given that all such planning should appear in the CITP itself and not in a parallel document and process. *We call on the Municipality to re-allocate the R3million currently budgeted for the Roads Master Plan to a speedy and comprehensive finalisation of the latest CITP, based on the principles and requirements of the relevant national and provincial transport and spatial legislation.* Naturally, publication of a compliant CITP should be followed by speedy funding and implementation.

4. Specific suggested improvements

- (a) Section 7.3.3 on the *Integrated Zoning Scheme* should be integrated into Chapter 4 as a key component of spatial planning as set out in SPLUMA.
- (b) Delete Section 7.6 on the CITP. Start a new Chapter (call it Chapter 4A for the moment) on the CITP. For the moment, that Chapter will be very brief and contain only the principles and relevant legislation. In future IDPs, it should grow considerably. For the moment, no specifics can and should be listed, given that the new ATC-encompassing CITP does not yet exist. The specifics currently listed in Section 7.6.2 are far outdated and must be deleted.
- (c) Start a new Chapter (call it Chapter 4B for the moment) on the **Stellenbosch Environmental Management Framework** (SEMF). As in the case of the CITP, this can be brief and refer to the full document. The SEMF must, however, appear in the IDP to reflect its rank as a primary planning instrument.