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# FRIENDS OF STELLENBOSCH MOUNTAIN



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## Comments on the 2019 Draft Integrated Development Plan

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### 1 Updating of Sections 6.3.1 and 6.3.2 of draft IDP

- 1.1 Sections 6.3.1 and 6.3.2 of the Draft IDP pertaining to the MSDF resemble those of the IDP revision approved in May 2018, but they do not reflect the important reality that a new 4th generation MSDF will be tabled and approved in May 2019. The text of the 2018 IDP is in part incompatible with this new 4th generation revision of the MSDF.
- 1.2 It was communicated to us that policy and/or regulations as enforced by Province make it impossible to effect text replacement. A distinction was made between “amendments” to an IDP and a “review”. We understand that policy and regulations should be obeyed. However, there is ample precedent for such larger revision in the draft 2019 IDP itself, which apparently do not trigger problems at all. Here are some examples:
  - a. The section *Contents-Revisions* of the 2019 draft IDP itself lists extensive rearrangement of content compared to the 2018 version. That apparently is not prohibited.
  - b. Section 6.3.2 of the 2019 draft IDP already differs fundamentally from the 2018 IDP. Example: three 2018 paragraphs were left out of what is now item (b) of Section 6.3.2.
  - c. Most important of all, the 2018 IDP contains **five pages of concepts** following the heading *Overarching concept*; see pages 49–54 of the 2018 IDP. These five pages have been summarily removed in the 2019 draft IDP, where item (c) of Section 6.3.2 starting with the same *Overarching concept* has been reduced to eleven lines! This is unacceptable as it eliminates almost all reference to overall concept or principle when in fact these are critical.
- 1.3 **The conclusion is clear: there appears to be no basis in law or policy which would prohibit including Section 4.1 (Vision) and Section 4.2 (Concept) of the draft 2019 MSDF into Section 6.3.2 of the draft 2019 IDP.**
- 1.4 **We call on the IDP administration to (a) delete the current Sections 6.3.1 and 6.3.2 of the 2019 draft IDP and (b) insert Sections 4.1 and 4.2 of the 2019 draft MSDF in their place.**

## 2 Comments on the CITP

- 2.1 We are forced to insert comments on the Comprehensive Integrated Transport Plan (CITP) into the IDP comments here because there appears to be no separate channel making provision for public input into the drafting of a CITP revision.
- 2.2 The matter is urgent because it has been stated repeatedly in public fora that revisions to the CITP are underway.
- 2.3 The purpose of the present comments is to emphasise that **the IDP and MSDF** (and of course all other relevant legislation) **is required to inform and determine the CITP in all its aspects**. The basis for this requirement is broad and solid:
  - a. Section 8.1 of the National Land Transport Act Minimum Requirements for the Preparation of Integrated Transport Plans, 2016 (“MinReq 2016”) states that the CITP must be prepared *with due regard for to relevant integrated development plans, and must comply with the Spatial Planning and Land Use Management Act and other applicable national and provincial laws.* (“SPLUMA”)
  - b. According to MinReq 2016, there should be a *total overhaul every 5th year* of a CITP (see Page 9). It has been mentioned repeatedly in public meetings that the Stellenbosch CITP is being revised; however, no draft has ever been published for public comment or participation.
  - c. Section 5.1 of MinReq 2016 states that *The overhauling of a plan every fifth year means that every aspect of the plan must be re-examined to see if it is still up to date, revised and updated where necessary, and relevant new aspects must be added.*
  - d. Also, MinReq 2016 requires that Chapter 4 of a CITP must be closely aligned with the SDF. We quote from Page 15 of MinReq 2016:

*Integrated Development Plans (IDPs) encapsulate all aspects of development planning and service delivery in municipalities. A spatial development framework (SDF) must form an essential component of every IDP, reflecting geographically the municipality’s strategy for delivering infrastructure and services in a sustainable and cost-effective manner. . . . The SDF must be aligned with the ITP for the area, and in turn the SDF must be taken up in the ITP, clearly showing existing and intended transport corridors and nodes, and areas earmarked for mixed land use and densification in support of public transport. The SDF should also indicate the municipal land use strategies that will be used to discourage urban sprawl and the dispersal of activities making them dependent on travel by car. The CITP should indicate the specific measures proposed in the SDF to support public transport and to ensure that transport services may be carried out in a sustainable and cost-effective manner. The SDF so included in the CITP will give explicit effect to section 38 of the Act, which empowers the planning authority to manage any change or intensification of land use which deviates from that specified in the SDF.*
- 2.4 The current CITP review therefore **must** be aligned with the new MSDF and IDP rather than evolve independently.
- 2.5 The currently available (year 2013) CITP is in parts incompatible with the draft 2019 MSDF and the IDP, and SPLUMA was only promulgated in 2013.
- 2.6 There should be a public participation process on the CITP review.