

B. Public Comment Received Following Advertising of the Draft MSDF

The Draft MSDF was advertised for public comment during March 2019. Comments received are summarised in the table below. Several observations can be made related to the comments received, addressed under themes in the paragraphs below.

Urban edges

The overwhelming majority of comments received relate to urban edges. On the one hand, there are requests for the extension of urban edges, and mostly the extension of urban edges into land currently reserved for agricultural purposes. On the other, there are objections to smallish extensions of urban edges to include infill residential development – in a way rounding off current edges in places where services exist – and providing more opportunity for housing adjacent to existing urban development.

The requests for urban edge amendments – mostly submitted via town planning consultants representing private landowners of agricultural land – is extensive. A more detailed analysis of these requests, based on comments received in response to the Draft MSDF (and also including an analysis of comments received on the previous MSDF) is summarised in the map forming part of this appendix (Diagram 1). **Some 1 375ha of land is involved, a land area almost comparable to the size of Stellenbosch town.**

It is a serious issue. If accepted, all requests for urban edge expansions will result in the large scale loss of valuable agricultural land and associated opportunity. Furthermore, it will disperse development energy to the extent where national, provincial, and local settlement development and management policy objectives aimed at the compaction of urban settlements (and associated benefits) will probably never be achieved.

Should the policy position to contain the lateral sprawl of settlements be valued, it appears to be very important to take a tough stance now in decision-making related to settlement development. The continued dispersal of development energy – focused on ad hoc development of peripheral land – will in all likelihood render achieving more compact settlements unachievable. At the same time, the loss of agricultural land and nature assets is likely to have serious consequences on future livelihood sustainability.

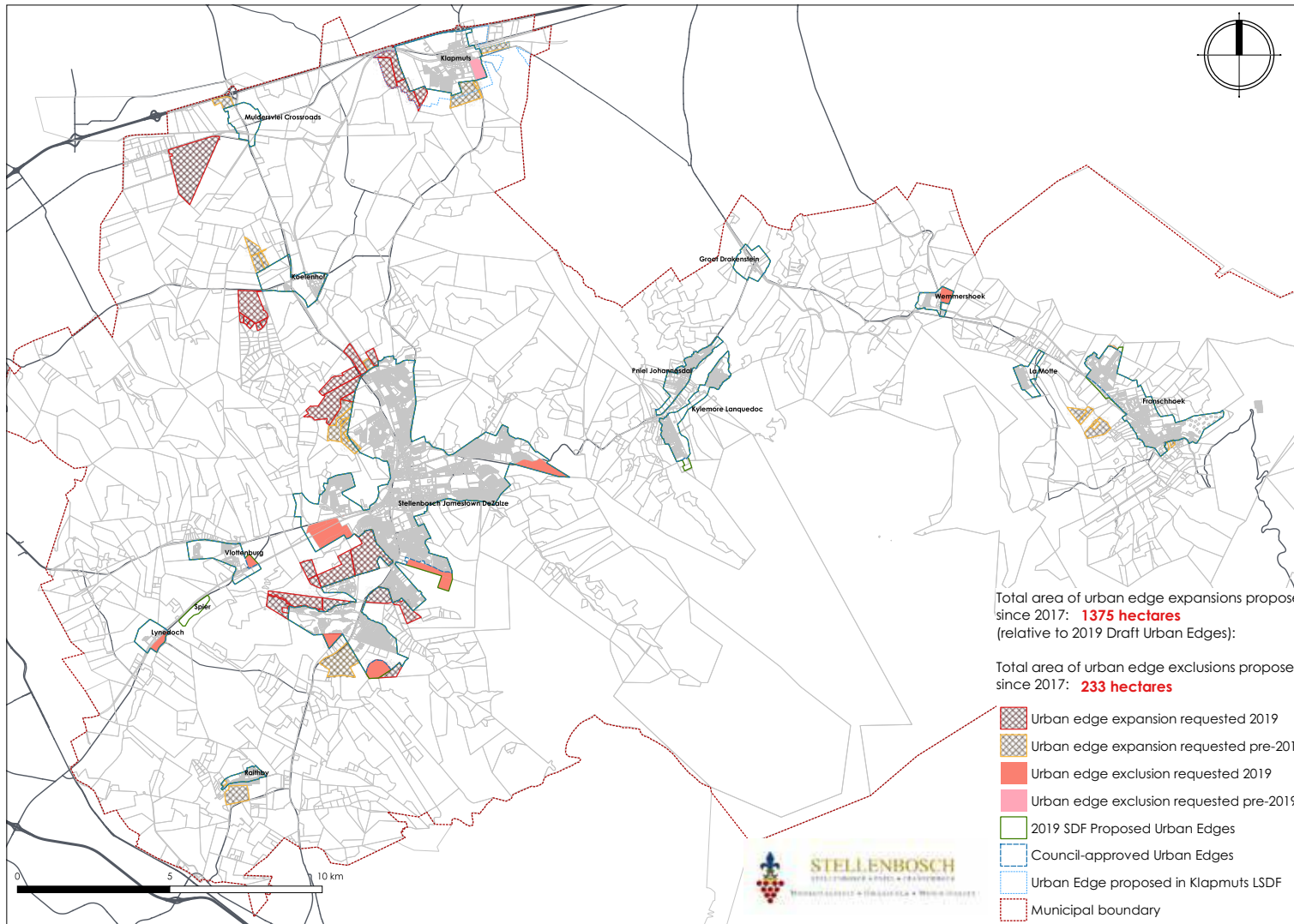
The MSDF simply asks decision-makers to enable an opportunity to achieve agreed policy objectives. Hold urban edges for now as far as possible to enable compaction and more efficient settlement development to take place. This position is not negligent of various concerns and issues related to agricultural activity, including that of safeguarding agricultural assets from theft where farms adjoin urban development, issues related to land redistribution, and so on. Also, it is understood that compacting settlements is a tough task. Associated land is often expensive, there are issues of adjoining activity and “rights” to be considered, the need for partnering between land owners, and reconfiguring existing infrastructure (as opposed to designing things “anew”). It is not the development approach that we have become accustomed to. Albeit it is easy to frame a policy of compaction and curtailing sprawl; implementation is tough and not the norm. Yet the MSDF has identified a significant alternative: the Adam Tas Corridor initiative. The project provides the opportunity to fundamentally restructure Stellenbosch town – benefitting large numbers of people. However, it will only succeed if tight urban edges are maintained in parallel to rolling out the project. In the case of Klappmuts, the development of Farm 736/RE will unlock land and infrastructure development for which municipal funding does not exist. In this settlement, as in

Stellenbosch, it is important to realise development potential in an orderly manner. Widespread urban edge expansion and allocation of rights in response to a policy position recognising the growth potential of Klappmuts may undermine initiatives for which bankable business plans and development programmes exist.

The second issue relates to public reaction to land identification initiatives to extend residential opportunity adjacent to existing residential areas on the urban edge, rounding off existing urban edges, and often involving public land. Clearly, if settlements are to be compacted, and residential opportunity to be extended within existing settlements, every opportunity needs to be explored to do so. However, residents in established communities adjacent to such land appear to fear the implications of further development. It is perceived that the quality of neighbourhoods will diminish, property values be impacted upon, and so on. Again, these fears are real, and should not be ignored or taken lightly.

Infill development is a necessity to achieve compact, more efficient settlements and maintain assets of nature and agriculture. The key appears to be the processes followed in enabling infill development. Open processes should be followed – as prescribed in legislation – where the concerns of existing residents are heard, respected, and incorporated in planning. At the same time, existing residents need to recognise that others have needs, and fulfilment of these needs lie at the heart of sustaining livelihood opportunity and well-being for settlements as a whole.









Finally, it appears that there is a view that the inclusion of land within urban edges is a “right to develop” and first step to acquire “higher” development rights. It is as if many have little regard for the overall principles of the MSDF (or that of its higher level statutory and normative context as



Proposed urban edge expansions and exclusions

Total area of urban edge expansions proposed since 2017: **1375 hectares**
(relative to 2019 Draft Urban Edges):

Total area of urban edge exclusions proposed since 2017: **233 hectares**

-  Urban edge expansion requested 2019
-  Urban edge expansion requested pre-2019
-  Urban edge exclusion requested 2019
-  Urban edge exclusion requested pre-2019
-  2019 SDF Proposed Urban Edges
-  Council-approved Urban Edges
-  Urban Edge proposed in Klapmuts LSDF
-  Municipal boundary

outlined in SPLUMA and related national, provincial, and local policy). Inclusion in the urban edge has become a "guarantee" to development rights. The MSDF process has primarily become a discussion of urban edges – what is in and what not – as opposed to organising activities in space in a manner which serves the public good.

An urban edge is a planning instrument employed to direct and manage the growth of an urban area towards achieving stated objectives. It should not be seen as giving rise to development rights, or as a means to circumvent or underplay appropriate environmental, infrastructural, and planning investigations. Urban edges could be adjusted, if it is proved that this would result in benefit to the overall settlement and community in multi-dimensional ways. If a developer or project initiator believes – and can prove – that a development proposal will be aligned to or benefit stated and agreed national, provincial, and local settlement development and management objectives, it should matter little whether the proposal is located outside the urban edge.

Urban edges are also employed to ensure development in a planned manner for the settlement as a whole. Both the Municipality and private land owners and developers are provided with some certainty as to the preferred focus of development for a planning period. In the case of SM, this focus is to compact settlements as far as possible.

Klapmuts

The MSDF, aligned with higher level settlement development policy, identifies Klapmuts as a place with significant development opportunity. A previous