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## REVIEW COMMENTS

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<b>DOCUMENTS</b>	: Adam Tas Corridor Local Spatial Development Framework, September 2021 Adam Tas Corridor Development Guidelines, September 2021
<b>FILE REF</b>	: ATC LSDF Review Comments July 2022
<b>PURPOSE</b>	: To capture comments from the Chief Directorate: Road Planning
<b>REVIEWER</b>	: Department of Transport and Public Works Chief Directorate: Road Planning
<b>DATE</b>	: 4 July 2022

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### 1. General Comments

The Chief Directorate Road Planning of the Department of Transport and Public Works does not support the proposals reflected in the following documentation of the Stellenbosch Municipality in its current form:

- Adam Tas Corridor Local Spatial Development Framework, September 2021
- Adam Tas Corridor Development Guidelines, September 2021

## 2. Adam Tas Corridor Local Spatial Development Framework, September 2021

<b>Clause</b> (Indicate clause/ regulation Number)	<b>Comment</b> (State why the clause/regulation or proposed amendment is not supported or what the problem is with the provision)	<b>Suggestion</b> (Suggested deletion/amendment/ addition)
Executive Summary	<p>"It is envisaged that the bulk allocated to an ATC and its precincts remains "floating" across the area, subject to landowners meeting agreed obligations related to expanding the commons and precinct planning. The transfer of rights happens at the Site Development Planning Stage. Managing the floating of rights and activities over time and space is a balancing act to maintain the overall development intent."</p> <p>Transport infrastructure will need to be determined at an early stage. Land use will need to be managed to ensure that the transport infrastructure provisions made can serve the developments while retaining the desired level of service for all road users.</p>	<p>The DTPW Roads Branch will need to be consulted as an affected party in connection with any impact, direct or indirect, on the Proclaimed Provincial Road Network assets.</p>
1.1 .2. The ATC LSDF Area	<p>"The ATC covers an area of some 375ha, compared to the 120ha of the Victoria &amp; Alfred Waterfront and 250ha of Century City in Cape Town (see Figure 2)."</p>	<p>It would be useful to understand not only the extend of area but also the extent of relative trip generation.</p> <p>Alternative access and egress routes need to be identified for the Adam Tas Corridor (ATC) – the proposed developments can't rely solely on the ATC Provincial Road Network which already experiences congestion.</p>
3.9. The Stellenbosch Municipal Spatial Development	<p>"The corridor is in not proposed as a continuous development strip. Rather it is to comprise contained, walkable settlements surrounded by nature and agriculture, linked via different transport modes, with the rail line as backbone."</p>	<p>Given the unreliable nature of rail services, this presents a technical risk.</p> <p>A sensitivity analysis should be undertaken to be determine the traffic impact if the rail line</p>



Framework (MSDF), 2019		does not serve as the backbone as envisaged.
3.9. The Stellenbosch Municipal Spatial Development Framework (MSDF), 2019	<p>“Managing residential growth of the town, through providing more inclusive housing at higher densities than the norm, is vital. This can and must bring significant reductions in commuting by private vehicles to and within Stellenbosch town, and provide the preconditions for sustainable public transport and NMT to and within the town.”</p> <p>Is not clear from the document what appetite there is for accommodation in town and to what extent this is envisaged to reduce the commuting traveling public.</p> <p>It is also not clear how the anticipated additional parking demand associated with additional housing will be managed, given the attraction and aspirational nature of car ownership.</p>	<p>The envisaged reduction in commuting traffic is to be identified and included in the document.</p> <p>The management of parking demand is to be addressed in the document.</p>
3.9. The Stellenbosch Municipal Spatial Development Framework (MSDF), 2019	<p>“Unless more opportunity is provided for both ordinary people working in Stellenbosch, and students, it will be difficult to impact on the number of people commuting to and from Stellenbosch town in private vehicles on a daily basis”</p> <p>Is not clear from the document what appetite there is for accommodation in town and to what extent this is envisaged to reduce the commuting traveling public.</p>	<p>The envisaged reduction in commuting traffic is to be identified and included in the document.</p>
3.13 Draft Stellenbosch Municipality Roads Master Plan (2018 Update)	<p>The Adam Tas Corridor (ATC) covers an area of some 375ha and stretches along the R310 and R44 strategic road network linkages. The scale of the study area and proposed development indicated in the ATC Local Spatial Development Framework (LSDF) will have an impact on traffic volumes on the existing and future road network.</p>	<p>The impact of the proposed bulk m<sup>2</sup> (Section 6.4.6) on transport infrastructure requirements and phasing needs to be assessed, aligned and integrated with the Stellenbosch Municipality (SM) Roads Master Plan (2018).</p> <p>“Significant densification/development is expected in Klapmuts, Droëduike, Adam Tas Corridor, Botmanskop and Jamestown. The extent to</p>

		which these developments will be implemented and its impact on the road network will still need to be explored."
3.14 Parking Study, 2019	The scale of the study area impacted by the ATC LSDF and bulk associated with the proposed development will impact on parking demand in ATC and adjacent areas within Stellenbosch.	The impact of the ATC LSDF parking demand needs to be considered with the findings and proposed interventions of the SM Parking Study (2019).
3.16. Landowner Plans for the ATC and Adjacent Areas	<p>"Table 4 and accompanying figures summarizes known development proposals for various parts of the ATC and adjacent areas."</p> <p>It is not clear from the document what traffic studies have been undertaken to support these development proposals.</p>	<p>The full extent of the impact of the consolidated ATC development proposal needs to be determined by means of a detailed traffic study.</p> <p>Further, this traffic assessment will need to undertake sensitivity analyses to determine the impact on the road network if the public transport and NMT transport share is not as significant as envisaged.</p>
4.3 Approach to the ATC LSDF	Given the extent of the ATC area and anticipated lengthy development period, the ATC LSDF sets out to provide the minimum necessary guidance – in terms of infrastructure to enable meeting project objectives while ensuring applicable LUMS and landowner obligations associated with exercising development rights follow the LSDF process.	Several transport infrastructure improvements are proposed (section 6.6.3), as part of the ATC LSDF. The DTPW Roads Branch must be consulted as an affected party due to impacts and interventions on the Provincial Road Network.
5.2. Area, Land Ownership and Use Rights	<p>"A relatively few large landowners could assist in reaching a speedy agreement on the future of the area. The need for new zoning enabling development provides the municipality with the opportunity to direct development to agreed policy objectives."</p> <p>It is important to ensure that development along the ATC corridor does not adversely affect the mobility function the Provincial Roads serve.</p>	The DTPW Roads Branch needs to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.



5.2.1. Key Attributes and Opportunities of specific land parcels	<p>"Sawmill: It is understood that Steinhoff has sold the Sawmill site. It appears that a previous proposal for a regional shopping mall/office on the site will not be pursued."</p> <p>This is vague language for a key area adjacent to the ATC.</p>	It is vital that assumptions and understandings are eliminated as far as possible to ensure a sound base for the development proposals.
5.2.2. Constraints and Actions Required	<p>"There appears to be few title deed restrictions which will inhibit redevelopment, but a detailed review of title deeds is appropriate at later planning stages."</p> <p>This is a fundamental possible constraint and will need to be determined as soon as possible.</p>	Land use directly affects transport infrastructure and will need to be determined as a matter of priority.
5.4. 1.3. Constraints and Actions Required	<p>"Given the limited income of a large proportion of the population, a settlement structure and form prioritizing walking and public and NMT, should be pursued."</p> <p>It is not clear how this will tie in with the anticipated business case for the precincts and how the demand for private vehicle ownership and parking will be managed.</p>	Further detail to be provided in this regard.
5.4.2.2. Opportunities	<p>"Redevelopment of the area to provide the opportunity to provide new educational facilities accommodating learners from all-over Stellenbosch."</p> <p>No information is provided regarding the traffic impact of such a proposal – has the traffic impact of such a proposal been identified?</p>	Further detail to be provided in this regard.
5.4.3.2. Opportunities	<p>"Redevelopment of the area provide a significant opportunity to increase access to housing for lower income groups - specifically those qualifying for "affordable" housing - and students."</p> <p>It is not clear how this will be managed and controlled given the demand for accommodation in the area.</p>	Further detail to be provided in this regard.

5.5.2.3 Built Environment Context – Constraints & Actions Required	Integrating the ATC with Stellenbosch town, and parts of the area with each other, is a key challenge to be overcome in realizing the area's full potential. To enable the Papegaaiberg-university avenue-Jan S Marais Park connection, bridging the rail and R44 is required in the vicinity of Alexander Road/Du Toit Street.	The DTPW Roads Branch needs to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
5.5.3.1 Access & Movement – Key Attributes	Vehicular access to the area – and between parts of the area - is limited. The ATC LSDF indicates proposed developments require upgrades to the Bird Street intersection; the elimination of the rail crossing at Adam Tas / George Blake Road; the realignment of Merriman Avenue; upgrading the existing Stellenbosch Rail Station; upgrading the Adam Tas/Strand Street intersection; and a new pedestrian crossing adjacent to Stellenbosch Station. With the development of Droeë Dyke, Adam Tas, and Van der Stell, a new overhead railway station and road-over-rail bridges are envisaged. Development of George Blake and Kayamandi North will require various station, bridging and intersection improvements.	The DTPW Roads Branch needs to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
5.5.3.3 Access & Movement – Constraints & Actions Required	Achieving overall project objectives will require a focus on walkability, NMT, and public transport.	<p>The NMT and public transport requirements of the ATC LSDF, need to be supported by an updated Integrated Transport Master Plan for Stellenbosch.</p> <p>The reliance on walkability, NMT and public transport presents a technical risk to the proposals - what if the ridership is not achieved? What contingency plans and mitigations have been identified?</p> <p>This needs to be determined given the Mobility function served by the ATC.</p>



5.6.1.3. Constraints and Actions Required	<p>"The ATC LSDF is obliged to follow transport planning informed by national/provincial settlement planning and management statute and policy.</p> <p>The provision of affordable housing in the ATC area is a prerequisite for meeting national/provincial/local spatial planning and management objectives and mandated by law. The LSDF should explore a reasonable proportion of affordable housing related to the land value added through the allocation of significantly enhanced development rights. The ATC should explore alternative standards for public facilities, especially schools.</p>	Sound transport planning to established norms and standards is to be undertaken to ensure a balance between development and the mobility function the ATC also serves.
5.6.2.3 The Institutional Context – Constraints & Actions Required	Available municipal capital funding is required for backlogs and maintenance, i.e., there are virtually no funds to invest in support of new development and improvements to address existing problems with infrastructure. Ways must be found for the ATC to pay for itself.	Should the proposed capital improvement projects not be implemented, the ATC LSDF will exacerbate existing infrastructure problems. The DTPW Roads Branch needs to be consulted on infrastructure improvement appraisal, investment and phasing.
5.7 Synthesis – Spatial Integration	Integration of the ATC area with Stellenbosch town is possible with bridging at selected places. NMT network of the ATC should be integrated with and expand that of Stellenbosch Town.	The R310 & R44 act as strategic mobility routes on the provincial road network. ATC LSDF proposes to increase NMT crossings in the corridor. This will need to be discussed with the relevant road authority (DTPW Roads Branch).
5.7 Synthesis – Engineering Services	It appears that some development can start without extensive bulk infrastructure improvements. Refer to Section 6.6.3 Transport improvements per phase, which indicate bulk infrastructure interventions as part of Phase 1.	The existing road network currently operates beyond its capacity (Stellenbosch Municipality Roads Master Plan (2018)). The impact of additional development on the road network needs to be investigated prior to approval.

5.7 Synthesis – Movement & Transport	<p>“While the development should provide for vehicular connections and integration with the rest of Stellenbosch, the overall emphasis should be on enhanced public transport, NMT and walkability. “</p> <p>How realistic is this? What contingency/alternative plans are there in the event that uptake in Public Transport and NMT doesn't match projections?</p>	<p>Arterial / access management plans on selected roads which are part of the proclaimed provincial road network should be developed with approving road authority (DTPW Roads Branch) to manage growth &amp; development.</p> <p>Sensitivity analyses to be undertaken to determine impact of alternative (reduced) Public Transport and NMT use.</p>
5.7 Synthesis - Funding	<p>Earlier work has indicated that the project can fund its own infrastructure servicing needs through the context of development contributions payable, with sizeable funds “spare” for allocation to remedial or new infrastructure work in adjacent areas.</p>	<p>The extents and scale of the ATC LSDF will impact on the proclaimed provincial road network. Infrastructure interventions to accommodate increased travel demand from the ATC LSDF need to be workshopped and agreed upon with the relevant road authority (DTPW Roads Branch).</p>
6.3 Concept	<p>Key design ideas underlie the proposed concept:</p> <ol style="list-style-type: none"> <li>1. Separate but linked NMT and public transport, organized linearly along the rail line and supporting movement routes.</li> </ol>	<p>The proposed concept is dependent upon the support and commitment of external stakeholders, most notably PRASA.</p> <p>How will this be managed, and the desired commitment (infrastructure investment and operations) be sought?</p>
6.3 Concept	<p>Precincts are centered on current or future rail stations/transport interchanges (all part of the central movement corridor) with surrounding development within walking distance from such interchanges.</p>	<p>The proposed conceptual design is reliant upon a well-functioning and integrated transportation system within the ATC. How will this be</p>



		planned, implemented, and managed, without a strategic transport masterplan for ATC?
6.3 Concept	<p>"A good example is parking for private vehicles. It is anticipated that access to private vehicles - and the concomitant need for storage of vehicles - may change considerably over the development period of the ATC. One option accommodating present day needs for parking may be to centralise parking spaces and provide for parking in structures which could be readily adapted or redeveloped when needs change."</p> <p>A Technical assessment needs to consider if the take-up is not as envisaged.</p>	Development controls need to be implemented if the demand for private vehicles exceeds the development provision.
6.4.2 Development Framework – Figure 14	ATC LSDF includes an extensive area of development as part of Precinct #10 (up to approximately 200 000 bulk m <sup>2</sup> ). The proposed concept indicates that this precinct will take access off the R310. The R310 functions as a mobility route on the provincial road network.	Any proposed intervention (development, access, or upgrade) along or adjacent to the Provincial Road Network will require consultation with the DTPW Roads Branch. An Arterial / Access Management Plans (AMP) for ATC is needed.
6.4.4 Land Use	Given the location of the ATC as part of an already developed area, access to major transport systems and strategic objectives of maximizing existing land resources and establishing a vibrant, compact and efficient urban district enabling NMT. Land use across ATC is envisaged as mixed and relatively high density.	The existing road-based transportation system is already operating over capacity (Stellenbosch Roads Master Plan (2018)). Any mobility/access requirements of additional development along ATC require TIA's and alignment with a strategic transport master plan for ATC.
6.4.6 Bulk Table 9	Table 9. Land Use Bulk Summary for the ATC. The proposed mixed land use includes light industry, with maximum bulk of 670 000m <sup>2</sup> .	Will generate heavy vehicle and external road-based freight trips, which will require road network capacity (needs will not be met by NMT and PT).
6.4.10 Landscape	Several conservation worthy heritage resources identified within the ATC LSDF.	Will hinder increasing transport infrastructure capacity.

and Historic Character		Heritage resources constraining widenings, upgrades and links.
6.5.2 Movement Network	The movement network associated with the ATC is illustrated in Figures 20 and 21. Several of the proposed movement network interventions impact either directly or indirectly on the provincial road network.	The DTPW Roads Branch will need to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
6.5.2 Movement Network	<p>"Adam Tas Road/ R44 maintaining its role as a "mobility" route."</p> <p>It is vital that this is not forgotten in the course of developing the project proposals.</p>	The DTPW Roads Branch will need to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
6.5.4. Parallel actions	<p>"The movement network assumes that (key assumptions included below):"</p> <ul style="list-style-type: none"> <li>• PRASA will continue/ reinstate operations of the railway corridor service with new rolling stock and the implementation of additional rolling stock for increased demand.</li> <li>• Vehicle Operating Companies) by means of contracted services. This is a contentious process and, in many respects, based upon both legislative responses as well as the value proposition offered to the industry to transform.</li> <li>• The allocation of housing opportunity to people living, working and/ or studying in Stellenbosch, in that way assisting to removing commuters to and from Stellenbosch using private vehicles.</li> </ul> <p>The development proposals rely on fundamental assumptions – these need to be further developed and confirmed before planning progresses too much further.</p>	Fundamental assumptions need be confirmed before the development proposals are taken too much further.
6.6.2 Bulk services framework - Phasing	Proposal indicates prioritizing Precincts 6,7 for development. Existing access to these precincts is constrained and exhibits traffic problems. The proposed bulk floor area phase 1 is 400 000m <sup>2</sup> .	Any proposed intervention (development, access, or upgrade) along or adjacent to the Provincial Road Network



	How will the additional trips be accommodated if the existing traffic network and access arrangement is operating over capacity?	will require consultation with the DTPW Roads Branch and DTPW Roads Branch Approval.
6.6.3 Transport improvements per phase	Table 14. Transport infrastructure improvements per phase and precinct.	The impact of the proposed transport infrastructure improvements and phasing needs to be assessed, aligned and integrated with the that of the Stellenbosch Municipality (SM) Roads Master Plan (2018).
6.6.3 Proposed transport considerations	Figure 23. What is the status of the "proposed transport considerations"? Are these based on a transport study for ATC, the SM Roads Master Plan, or have these been developed as part of the ATC LSDF process.? Have the relevant road authorities provided input / comment on the proposed interventions?	The DTPW Roads Branch needs to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
8.2.3 Legislation and regulations	The most appropriate option for incorporating the LSDFs envisaged rights and obligations in the LUMS appears to be establishing and ATC Local Area Overlay Zone.	The proposed overlay zone and associated development parameters for ATC, should be supported by an overarching strategic transport master plan.
8.2.3 Development agreements	In support of the ATC implementation, agreements are envisaged dealing with shared responsibility related to the provision of infrastructure services and the phasing of infrastructure, including the extent and use of development contributions.	The DTPW Roads Branch needs to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
8.2.3 Steps for concluding a Services Agreement	Table 27. 3. Engineering Design – Submission of external bulk infrastructure designs for approval.	Any proposed improvements to the Provincial Road Network will require consultation with the DTPW Roads Branch.
8.5 Monitoring and Evaluation	Landowner and SM administrative agreement on: The Development Framework, the Local Area Overlay zone, and associated processes. The phasing and manner of infrastructure provision.	The DTPW Roads Branch needs to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.

### 3. Adam Tas Corridor Development Guidelines, September 2021

<b>Clause</b> <i>(Indicate clause/regulation Number)</i>	<b>Comment</b> <i>(State why the clause/regulation or proposed amendment is not supported or what the problem is with the provision)</i>	<b>Suggestion</b> <i>(Suggested deletion/amendment/ addition)</i>
2.3.7 Approach to Non-Motorized Transport (NMT)	Pedestrian and cycle infrastructure that is physically separated from motor vehicle traffic and larger streets, paired with traffic calming or traffic control to facilitate safe crossings.	Any proposed intervention along or adjacent to the Provincial Road Network will require consultation with the DTPW Roads Branch and DTPW Roads Branch Approval.
2.3.8 Approach to Bridges and Grade Separation	Bridging elements within the ATC are important pieces of public investment. They ensure the accessibility between opportunities on either side of the railway line and busy, wide Adam Tas Road. These bridging elements are either NMT focused, or vehicle focused and can either be overhead or underpass.	Any proposed intervention along or adjacent to the Provincial Road Network (incl. road reserve) will require consultation with the DTPW Roads Branch and DTPW Roads Branch Approval.
3.2.3.2 Precinct 2 - Built environment development guidelines – interface qualities	Buildings fronting onto Adam Tas Road must include an active ground floor opening onto the sidewalk which includes landscape elements and tree planting to further define the street space. Some street parking may be included with the street section.	Any proposed intervention along or adjacent to the Provincial Road Network will require consultation with the DTPW Roads Branch and DTPW Roads Branch Approval.
3.8.2 Precinct 8 – Landscape & Public Realm Guidelines	Physical crossing of Adam Tas Road to be emphasized.	Any proposed intervention along or adjacent to the Provincial Road Network will require consultation with the DTPW Roads Branch and DTPW Roads Branch Approval.
3.9.3.3 Precinct 9 - Precinct Specific Guidelines	Create safe NMT crossing of the Plankenbrugrivier to promote integration between existing development to the west and the Adam Tas Corridor. These bridges must be integrated with the NMT network of the Precinct.	Any proposed intervention along or adjacent to the Provincial Road Network will require consultation with the DTPW Roads Branch and DTPW Roads Branch Approval.



## 4. General Comments

Topic	Comment/Consideration
Cultural landscape – sense of place	<p><u>Identification of scenic routes and/or rural areas:</u> As an affected stakeholder, the DTPW Roads Branch and any relevant Road Authority will need to be consulted in the development of any Scenic Drive/Routes (or similar) Policy and endorsement and/or approval will be required before any measures can be implemented. Note applicability of Scenic Route Overlay Zones.</p>
	<p><u>Outdoor Advertising limitations:</u> As an affected stakeholder, the DTPW Roads Branch and any relevant Road Authority will need to be consulted in the development of Policy, especially as it relates to the road environment.</p>
Corridor Development	As an affected stakeholder, the DTPW Roads Branch and any affected Road Authority will need to be consulted in connection with any impact (direct or indirect) on the Proclaimed Provincial Road Network assets.
Area development – provision of bulk utilities	The planning of key bulk infrastructure needs to be considered to ensure that appropriate space/provision is made. During the process of providing the required infrastructure to support growth and development, the DTPW Roads Branch and any other affected road or utility authority will need to be consulted.
Land use – proclaimed road reserve	<p><u>Land use of Road Reserve considered.</u> Any proposal to expropriate sections of the proclaimed road reserve to accommodate development will require consultation and approval from the relevant Road Authority.</p>
Public Transport – proposed projects and new links	The DTPW Roads Branch will need to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.
Planning and execution of Road Projects	<p>As the relevant road authority, DTPW Roads Branch will require consultation in developing proposals along Provincial Road links. Consult with DTPW Roads Branch for additional information if required, as the information provided on transport infrastructure project pipeline in the SDF may not be up to date.</p> <p>It is important to note that implementation timing and funding of DTPW-led Projects to be determined by the DTPW Roads Branch.</p>

Arterial/Access Management Plans (AMP)	<p>Arterial Management Plans (AMP) are tools guiding the planning of major roads where pressure from adjacent development must be balanced with the mobility function of that road.</p> <p>DTPW Roads Branch approval of Arterial Management Plans is required where Proclaimed Provincial Road Network assets are directly or indirectly affected.</p>
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