

# D November 2019 MSDF: Policy on Urban Edge

## B. Public Comment Received Following Advertising of the Draft MSDF

The Draft MSDF was advertised for public comment during March 2019, and again during May 2019. Comments received during both rounds are summarised in Tables 51 and 52. 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.

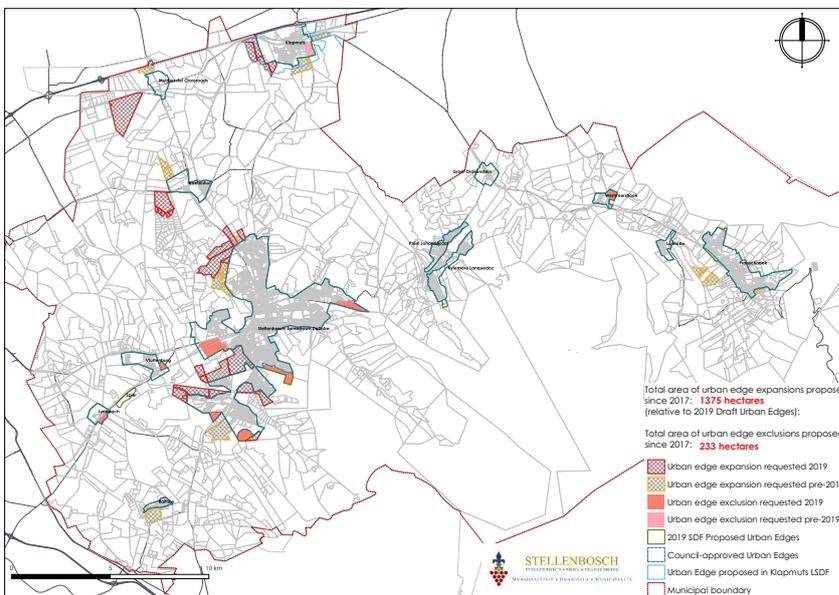
The MSDF simply asks decision-makers to enable an opportunity to achieve agreed policy objectives. Hold urban edges for now as far as possible to enable compaction and more efficient settlement development to take place. This position is not negligent of various concerns and issues related to agricultural 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 Klampmuts, 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 Klampmuts 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

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.

### Klampmuts

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

study – aimed at establishing Klapmuts as a “special economic development area” – has created high expectations among land owners, and numerous requests for urban edge adjustments.

It is not the purpose of the MSDF to prepare a LSDF for Klapmuts. Rather, the MSDF sets out to identify the overall role of and core principles for the future development and management of Klapmuts. The MSDF expresses concern about the extent of development projected through the previous study for both Klapmuts south and north (in the case of the north, DM commissioned a LSDF for the area east of Farm 736/RE). In many cases, there appears to be limited evidence of “bankable” business cases for the extent of development proposed. The MSDF therefore cautions against extensive adjustments beyond the current urban edge. The focus should rather be on supporting the implementation of projects achievable over the planning period, and careful further phasing of future development based on bankable development proposals.

#### **Farm worker housing**

The provision of farm worker housing is a key issue. A number of proposed farm worker housing initiatives are under preparation, including proposals at Meerlust, Koelenhof, and De Novo. The Municipality supports initiatives to provide farm worker housing/ agrri-villages. A key issue is whether or not this form of housing should be delineated by an urban edge. The Municipality is of the view that farm worker housing does not necessarily require inclusion within urban edges. It can occur within the rural landscape. This discussion – whether or not to include farm worker housing within urban edges – should not impede the provision of farm worker housing in any way.

#### **The Stellenbosch Northern Extension**

A number of comments relate to the delineation of the northern edge of Stellenbosch town in the vicinity of Kayamandi. The proposed northern edge

has been adjusted in discussion with municipal housing officials. Given the slope of land north of Kayamandi, it is suggested that this edge be determined in detail based on detailed studies associated with specific development proposals. The current proposal suggests some extension north of Kayamandi, as opposed to unimpeded northern growth following the R304.

#### **The Adam Tas Corridor initiative**

The Adam Tas Corridor initiative received broad support in deliberations about the MSDF. It is a critical initiative, indicating how many national, provincial, and local policy objectives – including compacting settlements and containing sprawl – can be achieved in Stellenbosch town.

Achieving the potential of the project will not be easy, and will require partnering, institutional, and procedural arrangements beyond the norm for development in South Africa. Nevertheless, considerable progress has been made on the project, in parallel with developing the MSDF. It is an opportunity to restructure Stellenbosch town in a manner which serves many diverse needs, and will receive considerable focus during the 2019/ 20 business year as part of the MSDF implementation framework.

#### **Droë Dyke**

The MSDF identifies the Droë Dyke area as ideally situated to address housing needs in Stellenbosch in a manner which serves national, provincial, and local settlement management objectives. Objections have been received stating that this land is used for agricultural research purposes and could not be considered for development.

Notwithstanding these objections, the MSDF maintains that the area is ideal for housing development, supports associated policy directives, and form an integral part of the Adam Tas Corridor initiative. The Municipality has approached the HDA to assist in unlocking the land (owned by

the National Department of Public Works). In this process, issues of current use will be addressed.

#### **Van der Stel Sports Grounds**

Some concern has been expressed related to the possible future development of the Van der Stel Sports complex. Redevelopment of the site could contribute significantly to restructuring Stellenbosch town. However, should the Van Der Stel complex be considered for development (as part of the ATC initiative) sufficient green space should be safeguarded, as well as public access to sport opportunity and associated facilities.

#### **TechnoPark**

In terms of the MSDF, TechnoPark should be developed and promoted to become an even more specialised zone for technological inventions and a hub for specialised business. Ideally, all stakeholders should work together to create an environment where the special purpose of TechnoPark can be developed to its full potential.

#### **“Relief”, link, and by-pass roads**

Considerable public debate in Stellenbosch has focused on the possible construction of relief, link, or by-pass roads. This is a response to increasing traffic congestion experienced at particular times on specific routes in and around Stellenbosch town. The MSDF maintains that a precautionary approach is required towards major road construction in and around Stellenbosch. Ideally, significantly more opportunity should be made for ordinary workers and students to live within Stellenbosch, in that way relieving existing roads of commuters. At the same time, the University, large corporations, and the Municipality should proactively work together to introduce traffic demand management measures, supported by the provision of NMT infrastructure and associated systems.