



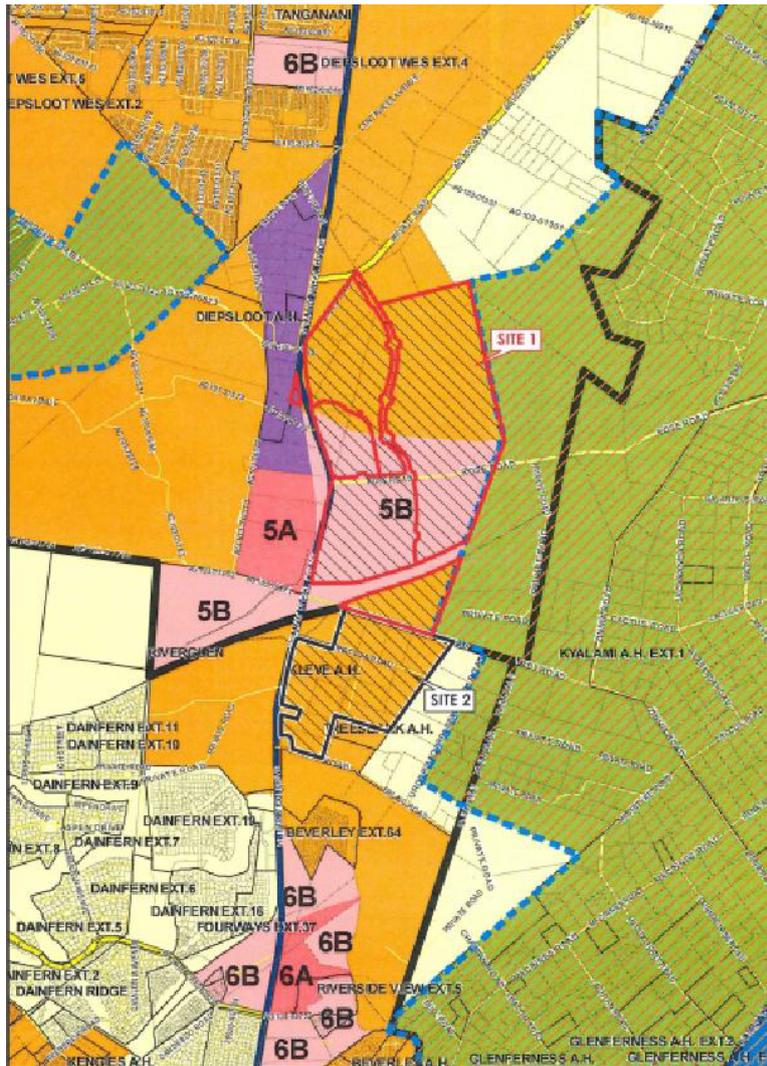
The "Greater Kyalami Conservancy"
in partnership with
 The "Greater Kyalami Residents Council"



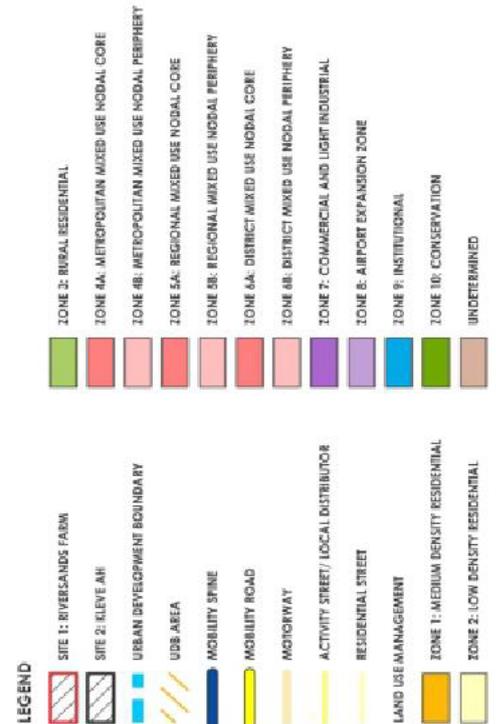
Date	19th June 2013
Attention	Urban Dynamics
Re	Riversands Farm
Details	OBJECTION TO THE PROPOSED AMENDMENT OF THE REGIONAL SPATIAL DEVELOPMENT FRAMEWORK FOR REGION A, 2010/2011 (CURRENT RSDF 2010/2011) IN RESPECT OF THE DIEPSLOOT DEVELOPMENT FRAMEWORK (DDF) 2020.

This document is submitted to the City of Johannesburg on behalf of the Greater Kyalami Conservancy (GEKCO) and the Greater Kyalami Residents Council representing Sun Valley, Kyalami Ridge, Beaulieu Country Estate, Blue Hills Country Estate, Heathcliff Estate, Glenferness, Kyalami Ext.1 and Saddlebrook Estate. Our objections to the proposed amendment of the Current RSDF 2010/2011 in respect of the DDF are identified and elaborated on as follows:

- 1 *"The Regional Spatial Development Framework (RSDF), together with the Spatial Development Framework (SDF), represents the prevailing spatial planning policy within the City of Johannesburg."* The purpose of the RSDF is to afford the public an opportunity to be a participant in and determine a mutually beneficial further development scenario for the geographic area that it encompasses. This proposal and the approval process should be transparent and provide a relatively high level of certainty with regard to what is eventually accepted as being the development framework for a particular area.
- 2 The current RSDF 2010/2011 is less than 2 years old and while it is not accepted by everyone it was the product of some considerable and protracted interaction between the City of Johannesburg and many affected residents, businesses and other interested parties.
- 3 As can be seen from the current RSDF 2010/2011 (Plan 1), the current RSDF 2010/2011 already makes provision for a wide ranging assortment of land use allocations within the broader development area which includes a large area that has been set aside in terms of the approved plan for "Commercial and Light Industrial" uses (purple area directly below Diepsloot West Ext 2) and also an area for what is termed a "Regional Mixed Use Nodal Core" and a surrounding area termed a "Regional Mixed Use Nodal Periphery" (all areas marked 5A and 5B respectively). The development area itself (Riversands Farm and Kleve AH) already provides for Regional Mixed Use Nodal Periphery and Medium Density Residential.
- 4 In terms of the current RSDF 2010/2011 a Regional Mixed Use Nodal Periphery can include the following land uses: high density residential; accommodation; educational; medical; social; retail; office; entertainment; motor trade; municipal; government; active and passive open space. A medium density residential node may include the following land uses: medium and high density residential; accommodation; educational; religious*; micro enterprise*; active and passive open space. (* these uses are subject to the relevant policy document).
- 5 In terms of the current RSDF 2010/2011 a Regional Mixed Use Nodal Periphery can include the following land uses: high density residential; accommodation; educational; medical; social; retail; office; entertainment; motor trade; municipal; government; active and passive open space. A medium density residential node may include the following land uses: medium and high density residential; accommodation; educational; religious*; micro enterprise*; active and passive open space. (* these uses are subject to the relevant policy document).
- 6 The applicant seeks to amend the current RSDF policy to accommodate the proposed SMME Incubation Hub and Business Park. The amendment sought includes the amendment of the area of the Regional Mixed Use Nodal Periphery to encompass the whole of the Riversands Farm and Kleve AH as well as the amendment of the Land Use Management Schedule to include Micro Enterprises, Light and Commercial Industrial under a Regional Mixed Use Nodal Periphery. It should be noted that Riversands Farm currently falls within the Diepsloot sub area (3) and Kleve AH falls within the Fourways/Dainfern sub area (4).



Plan 1 Northern Areas Development Framework - Current RSDf 2010 / 2011



- 7 Before commenting on the proposed amendment sought by the applicant, we would like to note that in relation to Micro Enterprises, the current RSDf 2010/2011 provides (page 66) that *"Micro Enterprises are defined as business or enterprises that are attached to and supplement a residential component. The residential component remains the primary land use associated with the property. This definition does not cater for the development of neighbourhood shopping centres. Such centres are better suited for the proposed mixed-use nodes, in particular the District Mixed-Use Nodes. District Mixed-Use Nodes have a 2km service radius, making such centres within easy reach for day-to-day shopping purposes."*
- 8 For the sake of clarity, we have also included the land use definition provided for Light and Commercial Industrial. Light Industrial means land use for non-pollution industries used for manufacturing purposes and would typically include: non-noxious factories; maintenance and repair workshops; engineering works; and builder's yards. Commercial Industrial means land use for the handling and storage of cargo and the wholesale of goods, such as: distribution centre; wholesale trade; warehousing; and cartage and transport services.
- 9 The proposed amendment to increase the area of the Regional Mixed Use Nodal Periphery is almost a tripling in size of the existing proposed node. The development area currently is proposed to exist of Medium Density Housing and the Regional Mixed Use Nodal Periphery (see Plan 1 above). The amendment, if allowed, will take away the Medium Density Housing. There can be little justification for such a drastic change to what was agreed by mutual consensus to be an acceptable long term development framework for this part of Riversands Farm and Kleve AH. Furthermore, the existence of the Medium Density Housing allows for Micro Enterprises (subject to Diepsloot Development Policies) and so does not require including Micro Enterprises under the Regional Mixed Use Nodal Periphery. This should also be read together with the guidelines for sub-area 4 (Kleve AH) which provides in its guidelines for the containment of non-residential development to the Fourways Regional Node.

- 10 The applicant states in its Information Brochure that it plans, within the Regional Mixed Use Nodal Periphery to establish a fully integrated mixed use development that will incorporate a Vocational Training Centre (SMME Incubator). The Information Brochure further provides that the 'Diepsloot Mixed Use Development Precinct' will consist of a business park – comprising of micro to large businesses with a variety of ownership and rental options, SMME Incubation Hub, Commercial, Big Box Retail and industrial activities; educational activities such as a proposed Business University; open space; and residential and recreational uses. It appears thus from the Information Brochure that that SMME Incubator will be separate from the Light and Commercial Industrial activities. It is our view that:
- a the inclusion of an SMME Incubator program within the Diepsloot Development Framework can be undertaken within the existing Regional Mixed Use Nodal Periphery set aside in the current RSDF 2010/2011. The area of the proposed Regional Mixed Use Nodal Periphery in the current RSDF 2010/2011 is also sufficient to provide for some retail, office, entertainment, motor trade, educational, high density residential and open space. Furthermore, the Medium Density Residential Zone provides for high and medium residential, micro enterprises, educational and open spaces;
 - b there are already areas within the broader development area (see Zone 7 on Plan 1) that are proposed as zones for "Commercial and Light Industrial" developments. These have not been developed yet and would ideally be able to well accommodate any light industrial and Commercial Commercial and Big Box Retail activities.
- 11 The ideal location for micro enterprise initiatives is within the established urban areas where social upliftment and access to enterprise solutions to unemployment are required and sought. This plan seemingly seeks to ignore the potential for micro-enterprise developments within areas such as Diepsloot and chooses instead to focus on creating completely new areas outside of the market that really would benefit from being closer to these facilities.
- 12 There can be no justification for the addition within this designated node of additional retail floor area whether it is for "Big Box Retail" or for any other extended retail area over and above what was previously approved. If the intention of this amendment to the RSDF is to better cater for the improved skills training and employment needs of residents in the surrounding areas then the inclusion of further or new big box retail will only further exacerbate the plight of those many entrepreneurs that are the backbone of the business community in areas like Diepsloot that will not be able to compete with big box "wholesale" retailers and will soon, themselves, be out of business and unemployed.
- 13 The inclusion of additional retail floor space by the applicant within this precinct and as a part of this RSDF revision request is grossly opportunistic and will, in fact, undermine the existing efforts of small scale traders and businessmen – the very people that the SMME training centre and other initiatives in this precinct hope to achieve. It is a well understood and accepted economic and retailing fact that Big Box Retailers with their enormous buying power and market influence are no match for small traders and that they will likely, within a very short space of time, result in at least 75% of these small scale and budding entrepreneurs within the precinct being unable to compete.
- 14 It is our submission that the land use of micro enterprises is already included in Medium Density Residential and, as such it is essential that the proposed land use zoning remain as per the current RSDF 2010/2011. The conversion of areas previously approved for Medium Density Residential purposes in order to make way for large tracts of areas designated for "Regional Mixed Use Nodal Periphery" uses cannot make sense - and certainly does not - in the light of the fact that substantial areas were previously set aside for this purpose in a balanced and harmonious manner in terms of the current RSDF 2010/2011.
- 15 It appears that the application to amend the current RSDF 2010/2011 is contra to the current land owners application for township approval (which was re-submitted in February 2013) or its existing Environmental Authorisation (which was approved in February 2013 but which is currently still under appeal). It is our view that the applicant is either being disingenuous with regards to its township application and Environmental Authorisation, alternatively that it is merely seeking to request the widest possible land use rights within the area in order to develop the area in a manner which will bring the most return to the applicant but with no reference to best social, environmental or developmental (and planning) practice. The amendment of the current RSDF 2010/2011 in the manner proposed by the applicant will provide the applicant *carte blanche* to do as it pleases, when it pleases and in the manner it pleases.
- 16 In conclusion, we believe that the broad land use provisions of the current RSDF 2010/2011 provides sufficient scope and adaptability to be able to accommodate the proposed new land uses that the applicant plans to incorporate within the Diepsloot Development Framework without having to resort to major changes to the established and previously agreed development fabric.