



The Environmental Partnership
PO Box 945
Cape Town
8000

1 August 2017

For Attention: Ms Kim Williams

Dear Ms Williams

COMMENT ON BACKGROUND INFORMATION DOCUMENT: APPLICATION FOR AUTHORITY IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT: PROPOSED MIXED-USE DEVELOPMENT OF ERF 1694 MELKBOSSTRAND

David Bettesworth Town and Regional Planners have been appointed by the Atlantic Beach Estate Home Owners Association (ABHOA) to represent them in relation to the above mentioned application. In this regard reference is made to your email dated 12 July 2017 confirming our registration as an Interested and Affected Party.

We thank you for the opportunity to provide comment on the Background Information Document (BID) in relation to the proposed mixed use development. We have also attended the public open day held on 18 July 2017 and assessed the supporting documentation presented at the open day and made available on your website. Our comments are as follows:

1. We recognize that this commenting process (comment on BID document) is the first in a series of legislated public commenting processes in terms of NEMA. It is also

recognized that any town planning applications required for the development proposal, such as rezoning and subdivisions will provide opportunity for further public comment. We therefore wish to reaffirm our desire to remain registered as an Interested and Affected Party and thus formally consulted as part of all subsequent public participation processes.

2. In general, the ABHOA acknowledges that City policy has advocated the development of the site for mixed use higher density development for the last 20 years in terms of adopted Council policy (the so-called BCD Development Framework of 1998). It also acknowledges that the capacity of 6th Avenue to accommodate further commercial and office development is very limited and that there is a need for additional mixed use development in order to ensure that the Melkbosstrand local area has the full range of land uses required in order to make the town as self-sufficient as possible and in order to minimize lengthy commutes. ABHOA further recognizes that there is a shortage of more compact housing types in Melkbos and that although Melkbos Village has to some extent catered for this need, that further demand for such housing exists. It is further recognized that this portion of City owned land which is centrally located and highly accessible, is arguably the best location for this type of development. Taking the above into account ABHOA does not object to the development of Erf 1694 per se. Our concerns however relate to the type and form of development proposed in the BID and its impact on Atlantic Beach Estate and the broader Melkbosstrand local area.

Development scenario 1 is considered to be of a scale and density that is excessive in terms of the number of residential units proposed and the type and form of this development. Development Scenario 2 is considered to be more acceptable in terms of the density of development proposed, but the scale, building form and land use categories proposed are still cause for concern.

Although it is acknowledged that the proposed urban design concept is very much a "first stab", the approach of creating a grid like structure and then filling it with uniform multi-storey blocks, with each block having the same (ridged) mix of land uses, is considered inappropriate in the context of the Melkbosstrand largely low density almost semi-rural town built fabric. In addition, the types of land uses that

need to be accommodated on the site in order make Melkbosstrand a self-sustaining community have not been catered for either in terms of the range of land use categories proposed, nor in terms of the built form options that will be required to cater for those land use categories.

For example, in Development Scenario 1, 1535 x 50m² residential apartments are proposed – ie no variety is offered in terms of housing type form or size, which implies that the actual market demand for residential housing stock in Melkbosstrand has not been researched. Furthermore, the proposed design makes no provision for the variety of building forms and layouts, nor the land uses that dictate such building and site layout variety, that would need to be catered for in order to create the kind of village centre feel that is required to arguably “complete” the Melkbos local area. Here the existing land uses that formed the first phase of the development of the site (from 1999 onwards) give a clue as to the type of land uses required ie police station, fire station, retail centre and service station, churches and group housing.

Facilities and land uses that are arguably required in order to complete the Melkbos local area are the following: library, medical clinics/medical centres, veterinary facilities, sports facilities/gym, places of worship, offices, group housing, retirement villages, additional retail such as DIY centre and motor fitment centre, municipal service centre, traffic department etc. Most of these types of facilities cannot be accommodated in the uniform multi-storey block with central courtyard built form structure proposed. In fact, the design proposal needs to be underpinned by a much more thorough and contextually informed land use needs and opportunities analysis which should then in turn begin to inform the placement of buildings and urban design considerations. Ultimately it may well be better to focus on the formulation of architectural and urban design guidelines which regulate principles such as height, form, design elements etc, rather than attempt to rigidly fix the position of a single form of building design (ie the multi-storey mixed use block) across the entire site. This may of course not have been the intention of the urban design report, but graphically and in terms of the land use and GLA breakdown, this is the impression created. In summary, the urban design proposal is too simplistic, contextually uninformed and impossible to implement taking into

account development industry constraints. The consultants are therefore urged to revisit the urban design/land use layout along the lines proposed.

3. The statement on page one of the Urban Design Framework document that there are three fixed access points off Birkenhead Drive is questioned. There is no physical access point from Birkenhead Road to the site, east of the dune ridge – this would be a new access point.
4. The statement on page three of the Urban Design Framework with regards to Development Scenario 1, namely “active ground floor plus maximum 5 storeys”, as well as the statement on page five with regards to Development Scenario 2, namely “active ground floor plus maximum 3 storeys”, require clarification. For example, are 5 storeys being proposed or ground plus 5, which is in fact 6 storeys in relation to Development Scenario 1 etc?
5. The terms “retail” and “commercial” used on pages 3 and 4 of the urban design document are confusing. After cross checking the floor area table, it became clear that “commercial” refers exclusively to office floor area. In the development industry, the term “commercial” is generally understood to have a wider meaning, that includes business and retail activities.
6. Although the site is located beyond the 5km Koeberg Emergency Evacuation zone, the impact of the proposed development on the Koeberg Emergency Evacuation Plan must be carefully assessed and in this regard the comment of the City Disaster Risk Management Department, Eskom and the National Nuclear Regulator must be sought. ABHOA notes with concern that the aforementioned authorities were not included in the list of I&APs provided in the Environmental Project Information report and requires the assurance that all the above authorities will be informed of the development proposal with immediate effect. ABHOA also requires the assurance that the aforementioned authorities are fully supportive of the proposed scale and form of development and that the Koeberg Emergency Plan and evacuation requirements will be fully addressed and international standards maintained.

7. The comment of the Provincial Roads Engineer (again not listed as an I&AP) is also keenly awaited as the intersections of the R27 with Birkenhead Drive and Melkbosstrand Road have been the scene of horrific motor accidents (although the signalization of these intersections has most certainly assisted in improving safety.) Full assurance is thus required from the Provincial and City Transport authorities that these intersections and the surrounding road infrastructure will be able to safely and efficiently accommodate the expected increase in traffic that the proposed development will generate. In this regard ABHOA is particularly concerned about the impact of newly proposed development access points onto Birkenhead Drive that will abut the main gate to the Estate and the new access point proposed to the east of the dune ridge. Development Scenario 2 is favoured in that the new access point onto Birkenhead drive would not be required – concern is expressed about the impact of vehicles entering and existing this curved stretch of Birkenhead Road which is also notorious for speeding.

8. Even though Development Scenario 1 proposes only 159 residential units to the east of the north-south dune ridge, ABHOA has significant concerns about the introduction of residential development in this area. In addition to the traffic and access issues already raised in point 7, concerns are expressed about the environmental and visual impact. The Melkbosstrand Road which provides elevated scenic vistas of Melkbosstrand from the east has been identified by the City as a Scenic Route. Although not identified as a Scenic Route, the R27 between Table View and Melkbosstrand offers similar panoramic vistas. These routes and the vistas they offer are critical in framing the sense of place that is so important to the visitors and residents of Melkbosstrand: ie that one has left the urban form of the metropole and entered into a rural/scenic landscape in which the built form when it emerges, is village like and relatively unobtrusive. The concern is that the introduction of additional residential buildings in this area will detract from this rural sense of place, much in the way that the three storey Melkbosstrand Village has done.

Page 1 of the consultant's urban design framework makes the following statement with regard to the cultural landscape of Melkbosstrand which reinforces the above argument: *"The cultural landscape is significant in understanding the relationship*

between the transition between the built form of Melkbostrand and the entry into the rural natural landscape beyond the urban edge. Entering into (the) Melkbosstrand has a distinct village (feel) and a sense of moving into nature and farmland. It is for this reason the residential development proposed in Development Scenario 1 to the east of the north-south dune ridge is not supported. Other than the ecological conservation educational facility proposed in scenario 2 the ABHOA do not support any form of development east of the north-south dune ridge as highlighted in red below.



9. As far as we are aware, no building in Melkbosstrand is higher than 3 stories in height and it is believed no building in the proposed "CBD" should exceed a height of three stories. There is a significant need for group housing and retirement village developments in the area, and the proposed development would do well to cater for these types of land uses. Given that the current population of Melkbosstrand is about 8000 people, the introduction of 1 500 apartment units which would conservatively increase the population to about 11 000, is considered way to excessive and will have a significant impact on services and facilities in the area.

Again, for this reason, the number of residential units proposed in Development Scenario 2 is considered more appropriate.

In conclusion ABHOA is not opposed to the development of Erf 1964 per se and our key concern relates to the impact of the Birkenhead Drive interface of the development in particular, ie in terms of built form, land use mix, architecture, quality of building, traffic impact etc. We are however not in support of the current development proposals which are not considered to be compatible with the Estate, nor the broader Melkbosstrand local area.

Yours sincerely

A handwritten signature in black ink, appearing to read 'DBettsworth', with a long horizontal flourish extending to the right.

David Bettsworth Pr.Pln (Reg. A/978/1997)