



The Environmental Partnership
PO Box 945
Cape Town
8000

18 January 2019

For Attention: Ms Kim Williams

Dear Ms Williams

**COMMENT ON DRAFT BASIC ASSESMENT REPORT (BAR): APPLICATION FOR AUTHTHORISATION
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. Reference is also made to our letter of comment on the Background Information Document (BID) dated 7 August 2017.

Our comments on the draft BAR are as follows:

1. We recognize that this commenting process is the second 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 be formally consulted as part of all subsequent public participation processes.

2. The BAR states on page 9 (and elsewhere) that with regards to Development Alternative 1, "an active ground floor with an additional maximum of 5 stories is proposed, where the height will not exceed 15 meters above ground level." It is not normally physically possible to construct 6 stories within a 15 meter height restriction, especially as "an active ground floor" surely implies retail and most retail designs would necessitate a higher floor to ceiling height of say 4m. If the number of units and GLA estimates are based on 6 stories and not 5 it would most likely be necessary to revise all these estimates downwards and update the Traffic Impact Assessment (TIA) accordingly.
3. The terms "retail" and "commercial" used throughout the BAR are confusing. After cross checking the floor area tables and those used in the TIA, 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. (This comment was made in our initial comment on the BID document and appears not to have been taken into account.
4. 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 BAR and its impact on Atlantic Beach Estate and the broader Melkbosstrand local area.

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 to make Melkbosstrand a self-sustaining community have not been adequately 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. We note (and support) the reference now being made to the need for a retirement development, although as will be discussed further, the nature of what is being proposed requires further refinement.

For example, in Development Alternative 1, approximately 1400 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 were therefore urged in our previous comment on the BID to revisit the urban design/land use layout along the lines proposed. This request appears to have been largely not addressed. While we appreciate that the project team may be trying to focus on globular GLA figures and unit numbers and the overall grid structure design concept in order to provide the necessary terms of reference to all the specialist studies required in terms of NEMA, the reality is that the general Melkbos public require a far more nuanced approach to land use and built form proposals, that are far more in keeping with the unique context of Melkbosstrand. This continued lack of attention to realistic urban design and land use detail, is in our opinion simply going to illicit further objections and obstruct the much needed community "buy-in" to the project.

5. 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 Eskom and the National Nuclear Regulator must be sought. ABHOA 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.

Furthermore, concern is expressed at the requirement made by the City's Traffic Evacuation Modelling (TEM) Committee, that the dueling of Sandown Road is required before the development of the CBD can proceed. As far the writer is aware, this dueling is completely unrelated to development in Melkbos and relates to service level agreements between the authorities and the developers of Parklands and Sunningdale. A more definitive and binding approval "link" between the ROD and subsequent MPBL approvals for the Melkbos CBD development and the dueling of Sandown Road will be required, if the dueling hasn't been completed by then.

6. With regards to our previous comments regarding the functioning of the Birkenhead Drive/R27 intersection and the proposed new access off Birkenhead Drive to the eastern portion of the proposed CBD development, we note the findings of the TIA and fully endorse the recommendation made by the City's traffic consultants not to support a new access point off Birkenhead Drive west of the existing wetland pan. As stated previously (and intimated by the traffic consultants), such an access point will almost certainly create major sight distancing/traffic dangers. As such we remain vehemently opposed to such an access point. The formal comment from the PRE on the proposed development is still however keenly awaited.
7. It is noted that Development Scenarios 1 and 3 still propose residential units to the east of the north-south dune ridge, with a height of up to 12m. In fact, Development Scenario 3 proposes additional units to Development Scenario 1 in this area, in order to compensate for the loss of developable land to the west in order to accommodate the proposed High School fields. ABHOA has significant concerns about the introduction of residential development to the east of the dune ridge and for this reason supports the proposal made in Development Scenario 2 to reserve the eastern portion of the CBD for conservation related/educational activities only.

In addition to the traffic and access issues already raised in point 6, 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 (even if a staggered height is employed as is now proposed), much in the way that the three storey Melkbosstrand Village has done. Taking this into account a very low density single storey West Coast farm type building typology and placement is considered far more appropriate.

8. As far as we are aware, no building in Melkbosstrand is higher than 3-4 stories in height and it is believed no building in the proposed "CBD" should exceed a height of three to four stories with a maximum height of 12m above ground level. Buildings higher than this would simply not be in character with the lowish density seaside-resort character that currently defines the Melkbosstrand sense of place. Whilst densification is needed, it must be respectful of its context.

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, as opposed to simply proposing 50m² apartments. Whilst we note that consideration is now being given for a retirement "village" in Melkbosstrand, most residents would be looking for a group housing style of building form as opposed to the apartment block style format proposed. This point cannot be over emphasized and is based on years of interactions between the writer (as a former town planning official and now town planning consultant) with residents in the area. The "village" part of the retirement village concept is critical to these residents who still want to have some access to privacy and the ability to maintain their own gardens, while having access to security, community areas and perhaps a frail care facility. An apartment style retirement facility already exists in Van

Riebeeckstrand, but no group housing development is presently available for residents of Melkbos who do not wish to move out of the area.

Given that the current population of Melkbosstrand is about 11 000 people, the introduction of another 1 400 apartment units as proposed in Development Scenario 1 and which would conservatively increase the population to about 14 000- 15 000, is considered way too 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 Alternative Scenario 2 is considered more appropriate.

Furthermore, the following statement made on pages 175 of the BAR is questioned: *“Over and above the CBD component of the proposal, the main component of the proposal, housing opportunities are central to the proposal. The City of Cape Town is looking to densify urban areas that are close to services and economic opportunities. The proposal responds to the need for affordable housing close to amenities and services and economic opportunities.”* Melkbosstrand may be connected via MyCiti to the rest of metropole, but it does not form part of the inner core and is in fact a low density peripheral settlement situated quite a considerable distance from the nearest urban area. Whilst there is a certain demand for additional types of housing units - particularly more affordable ones - this should not be over stated and hence our earlier comment that the City's project team carefully research and actually quantify that demand. It is argued that the provision of much needed community facility, retail and office opportunities (to accommodate the demand of existing residents) should be at least an equivalent, if not greater priority than the provision of additional housing, and the City should be careful not to over-densify Melkbos and create an undue dormitory suburb effect with long commute distances.

9. Although, out of the three Development Scenarios proposed, ABHOA most favours Scenario 2, due to no residential development being proposed to the east of the dune ridge, it is felt that pragmatically some provision should be made for additional school fields lose to the High School. It is however questioned whether the extent of school fields proposed in Scenario 3 is in fact needed, as when coupled with the proposed retention pond, this will result in the sterilization of a

significant amount of prime developable land to the west of the dune ridge. Perhaps provision should be made for a smaller additional field area next to the school with an additional (overflow) field area provided either to the east of the dune ridge or perhaps to the north of Melkbosstrand Road (as was initially envisaged).

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. Although we appreciate that some progress has been made in comparison to the BID phase in terms of addressing our concerns, we still consider none of the proposed development scenarios to be entirely compatible with the Estate, nor the broader Melkbosstrand local area. We therefore respectfully submit that in this regard further work/refinement by the City's project team to Development Scenario 2 (our most favoured option) is still required, before our objection can be withdrawn.

Yours sincerely

A handwritten signature in black ink, appearing to read 'DBettsworth', written over a large, light grey 'DRAFT' watermark.

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