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## **Parkview Residents' Association comments on the Nodal Review of Region B Presentation by City Transformation on 25/07/2017 City of Johannesburg**

### **1. Current Status.**

In terms of the approved SDF, 2016, Parkview falls into a "Consolidation Zone" of established suburban areas. It contains a single neighbourhood node situated on Tyrone Avenue. It is subject to an approved Precinct Plan, prepared by the representative community body in the area, the Parkview Residents Association (PRA).

The Precinct Plan has proved useful in guiding the further development of the historical township, retaining the neighbourhood business node on Tyrone Avenue, and allowing for significant residential densification on the frontage with Zoo Lake.

It was understood that the nodal review would be a refinement of the already-defined nodes in the SDF, 2016, but it would appear to be setting a new trajectory of incentives for densification and mixed uses in the City. From what was presented, it was unclear how the definition of most nodes (other than Sandton) would be changed and whether the Parkview neighbourhood node would be affected.

It is understood that the current SDF does not seek to promote high densities everywhere and that densities lower than the generic 20 du/ha may be permitted where there is no merit for higher densities. This is radically different from the proposals conveyed in the review, where a move towards a gradation of new densities across the City from locations with certain walkability and proximity attributes and indicative densities are proposed in the preliminary analysis. In the case of Parkview the current average density increases nine-fold to 90 du/ha. This is likely to fuel haphazard densification proposals across the City. The PRA would urge a reconsideration of the message from City Transformation to the residents and property owners that suggests a free-for-all and would make the City's task of supplying improved services and facilities extremely difficult.

## **2. SDF Analysis and Proposed Tools for Implementation**

In principle, the PRA supports the type of analysis being done. However, it submits that the analysis is too simplified to address the local characteristics of different areas and the real potential of the hexagons. These attributes would need to be expanded to include the heritage, topography, service capacity, traffic generation, and many other attributes to provide a realistic assessment of potential, and should integrate with other information sources that will improve City management (eg property identities, valuations, service meters, and the like).

The PRA submits that it also needs to be integrated with other City, Deeds Registry and area-specific information such as property descriptions, zonings, valuations, services availability, heritage, topography and the like to provide a more substantial basis for guiding further development in an integrated and positive way as required in the Municipal By-Law, 2016.

It was indicated at the presentation that the City's primary tool for implementation would be land use regulation, ie by controlling land use zoning applications submitted by the private sector and other parties. It was also highlighted that densification and land use changes would need to be supported by upgraded infrastructure, public transport, new facilities and parks. The PRA's experience in this regard is that the regulations and application processes do not match the intentions expressed in the Municipal Planning By-law, and that a policy-linked, top-down approach without the supporting upgrades is the norm. This is concerning as the incremental nature of change through individual applications does not lend itself to management and funding as proposed. In its view the proposed substantial densification of areas such as portrayed in the presentation needs to be quantified to assess the cumulative impacts of the targeted density and these must guide the interventions and funding in the public domain, including roads and services, community facilities, and the like. The PRA is of the opinion that it is preferable rather to link densification to strategic locations, such as is proposed in its current Precinct Plan, and to phase the infrastructural requirements accordingly, rather than promote haphazard densification that cannot be readily supported by aging infrastructure and inadequate facilities.

The disjuncture between SDF policy and land use regulation, with the former proposing change and the latter aiming for coordinated and harmonious development of the local area, has not been satisfactorily addressed to-date in the various decision-making entities at the City, notwithstanding the special requirements built into the current RSDFs.

There is also a concern about the City's institutional capacity to implement the complex City development strategies, particularly at the scale portrayed in the presentation. The PRA has found the City to be struggling with the most basic components of administration, the most evident of these are the administrative problems of notifying interested parties about land development applications, the inordinate delays, the decision-making system, the filing records, the billing system, the absence of law enforcement and the like. It is suggested that a parallel initiative to the Nodal Review is required to address the institutional shortcomings if an effective implementation mechanism is to be instituted.

It is understood that the nodal review and analysis, and the proposed regulatory enforcement through by-laws and the like, are intended to contribute to resolving the five main issues identified in the SDF, namely spatial inequalities, economic inequalities, spatial sprawl, exclusion, and inefficient residential densities and land use mix. However, it is not apparent that these tools can be effective in the face of an urbanisation wave driven by the attractive power of the City to people with limited resources, and where regulation is subservient to survivalist needs. The PRA would suggest that a more pragmatic approach to encourage more density and land use diversity would be to focus on strategically located areas as the current widespread approach is likely to undermine the workability and financial stability of the City's governance system.

### **3. Heritage and environment**

It is the PRA's view that the character and historical value of the local neighbourhood is linked to the topography, the buildings, the avenues of trees, and the like. These factors also contribute hugely to the diversity and appeal of the City, and that their destruction by generic residential densification, such as proposed in the nodal review, will have dire consequences for the liveability of the City.

It is not apparent from the presentation how the heritage resources of specific areas have been assessed as required in the National Heritage Resources Act, 1999, specifically Section 31(1). A great deal of research has gone into the identification and retention of heritage buildings and landscapes in the older parts of the City (including Parkview), and it is important and legally required that these be recorded and protected. As suggested earlier, this should be an attribute linked to the hexagons and integrated into the proposed new land use management scheme.

#### **4. Community Participation**

The nodal review suggests a uniform approach to densification throughout the City, ie one that is not nuanced or responsive to local circumstances (as was the case with the precinct plans and RSDFs). This seems to indicate move away from local input and would seem contrary to the core principles in SPLUMA in particular the principle of good administration that requires, amongst other things, transparent processes of public participation on matters directly affecting the public.

In this regard, it is understood from the review presentation that all precinct plans that are not aligned to the SDF principles will be rescinded when the nodal review is complete.

The PRA would be opposed to this generic approach and would strongly suggest that the city-wide SDF should be followed by more detailed investigations and revised proposals to suit the specific circumstances of local neighbourhoods.

#### **5. Concluding Comments**

The generic approach adopted in the development analysis, and the density goal of 15 000 people/km<sup>2</sup>, presents an alarming future built form vision for the City. Without diversity the City will not be sustainable or liveable, and it is imperative to involve local communities in the more detailed planning of their areas.

Regarding the Parkview neighbourhood node, there the analysis has not provided clarity on its status and how it is to be affected. The PRA considers it integral to the functioning and appeal of the neighbourhood.

The PRA recognises the need to align its future community planning with the City's direction of compaction and densification to the extent that this is possible. It is hoped that the outcome of the nodal review will be a framework for integrating diverse community inputs into a City-wide plan that is attainable, affordable and manageable.

The PRA would like to participate in the further development of the review, and to be consulted in aspects having a direct impact on the neighbourhood.

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**Chairman**  
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