
FRANKENWALD UDF: COMMENTS ON STATUS QUO REPORT

Submitted on behalf of Frankenwald Development Committee (FDC) by Urban Infinity Consultants

9 August 2020

Contents

Introduction	2
Status of the UDF.....	2
The Public Participation Phase	2
Frankenwald UDF Themes	4
Planning.....	5
Land-use rights: Status Quo.....	5
Spatial Policies.....	6
Local Context Policies	8
Environment	10
Transportation	13
Municipal Services and Social amenities.....	17
Housing	20
Socio-Economic and Market Study	22
Consolidation of Resident’s concerns & questions.....	23
Document Requests	25

Introduction

We understand that the Frankenwald Urban Development Framework 2020 (“UDF”), governing the development of the site “Frankenwald” is currently being drawn up by Urban Dynamics. As part of the development process, we see the urban development framework as a critical tool which assists developers in attaining a desirable development that fits in with the surrounding urban grain and structure. With the enactment of the Spatial Planning Land Use Management Act 2013, we understand that it has become compulsory for municipalities to draw up urban development frameworks as well as associated precinct plans. Due to this, we trust that the development of Frankenwald will adhere to the need for an urban development framework.

Status of the UDF

We understand that the Frankenwald Urban Development Framework is currently in the draft stage known as the status quo or analysis phase. During this phase, we understand that the urban design team will be analysing and reporting on the current situation and elements of the site as well as the surrounding area. In this phase of the process, we understand that all infrastructural, environmental, economical, and social facets surrounding the site are analysed. In doing so, we trust that the design team takes into account all strengths, weaknesses, opportunities and threats pertaining to the site and its surrounds which enables them to put forward proposals which will stand as the basis for the final framework.

The Public Participation Phase

As part of the process of drawing up this framework, we understand that the public participation process requires that all proposals be shared with interested and affected parties (I&AP). The Frankenwald Development Committee (“FDC”), comprising of representatives from the Kelvin Residents Association (KRA) and the Buccleuch Residents Association (BRA), the closest residential areas surrounding Frankenwald, was established:

- Gather the views of their constituent communities regarding the Frankenwald development,
- Work together with the various stakeholders to encourage and enable sustainable development at Frankenwald, which is beneficial to all communities within and surrounding Frankenwald, and
- Communication of safety, environmental, roadworks, infrastructural and other concerns and proposals for consideration between stakeholders, and during the public participation process.

We believe that as an interested and affected party, the FDC plays a critical role in shaping this development/framework, as well as the relationship of the future developed site with the existing Kelvin, Buccleuch and surrounding areas. At this point in the process, the design team has made I&AP's aware that they are inviting comments and suggestions for input on the framework.

The FDC has employed the services of Urban Infinity Town Planners to assist in packaging and documenting a cohesive report representing the comments, concerns, requests and suggestions of the Kelvin and Buccleuch residents Associations. We believe it is important at this stage to iron out any issues that may arise in the future. It will be helpful and useful for the design team as well as I&AP's to ensure transparency between them to make the process easier and the development a success.

Frankenwald UDF Themes

A thematic analysis of the draft status quo report has indicated the following critical themes throughout the document.

1. Planning Policy and Land-use Rights.
2. Environmental Status-quo
3. Transportation: Analysis through data presented in UDF
4. Housing: Analyses through the development scenarios
5. Socio-economic: Analysis through the applicable market study
6. Municipal services as quoted in the UDF

The following diagram extracted from the UDF represents the overall themes that will be assessed in this round of comments.

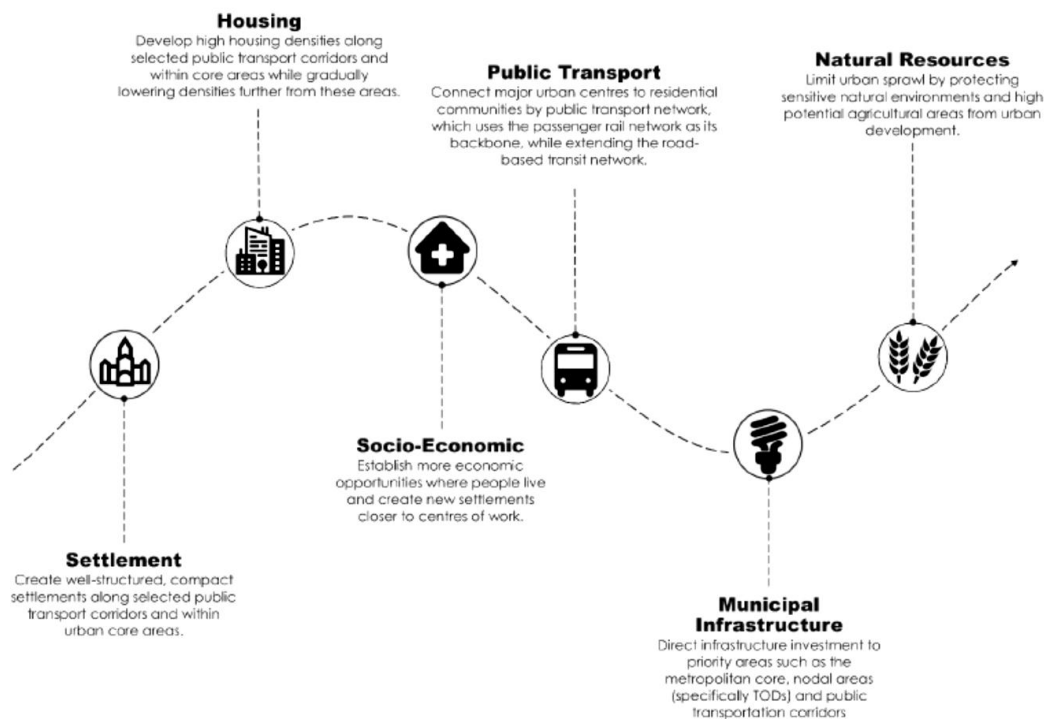


Image 1: UDF themes.

Planning

Land-use rights: Status Quo

The information at hand indicates that the landowners currently have approved rights with densities of up to 160du/ha which equates to roughly 10 000 units and commercial rights for up to 450 000m². The developers intend to increase the residential densities to up to 20 000 units which equates to roughly 250du/ha.

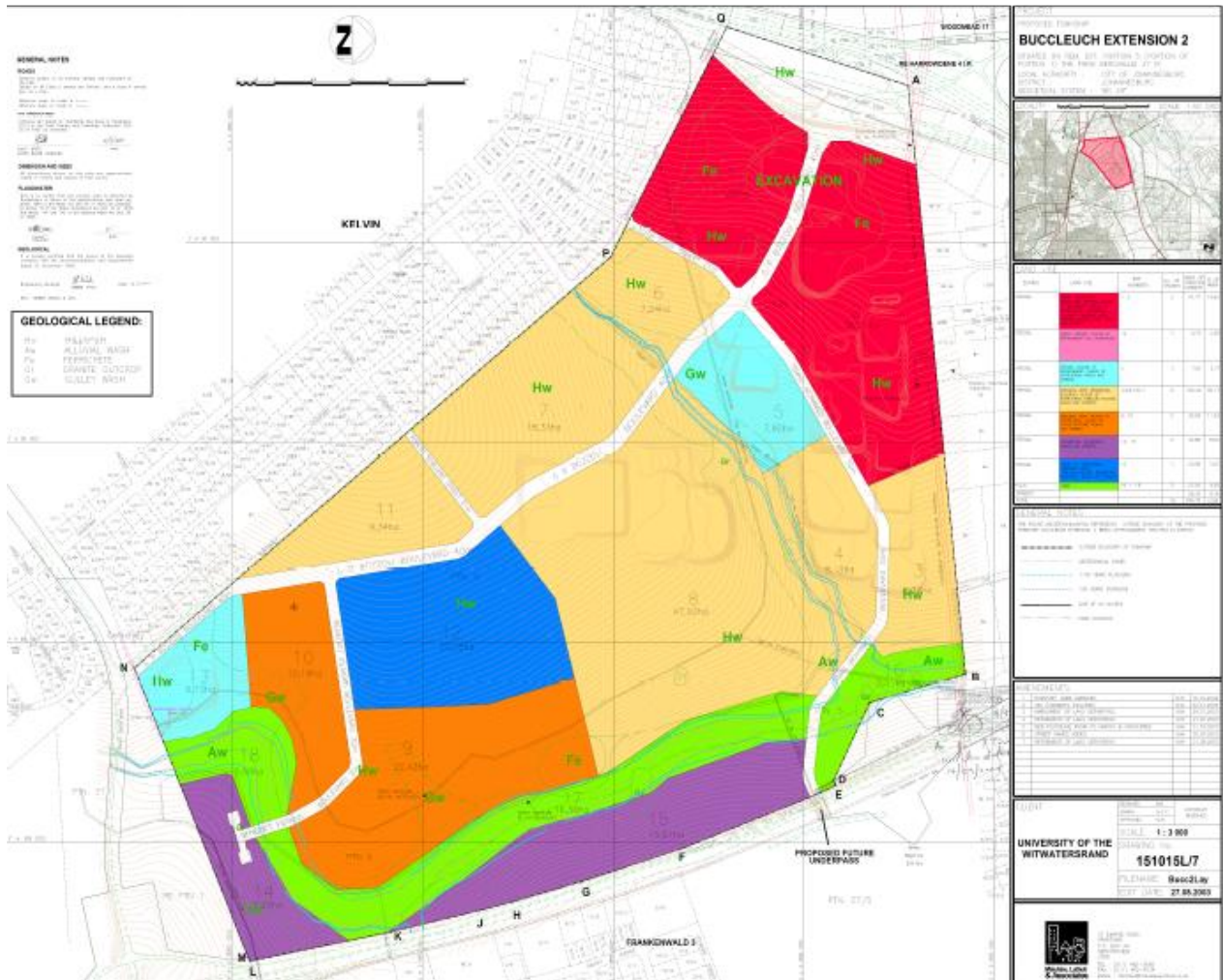
The pre-proclamation conditions that need to be attended to are as follows:

- Approval of Geotechnical Report
- A "Sect 101" letter from Eskom per phase confirming that the township register may be opened
- Approval of updated Outline Scheme Reports
- Approval of updated Traffic Impact Study
- Obtain Consent from the Dept. of Agriculture in terms of Act 70/1970
- Obtain comments from Gautrans
- Obtain comments from DMR

Should the developer however intend to increase those rights including the relevant densities, the application shall result in a material change and hence a new town planning application shall be required. At the time of any town planning applications or processes having to take place, the FDC requests to be made aware these in order to provide inputs and the communities views on the proposals.

With regards to the approved land use rights, it is imperative that the development takes place in a sustainable manner which takes into account all existing elements and scenarios. The UDF does not make specific reference to social amenities being proposed. Although the attached land use plan (below) can be viewed as conceptual in nature, it does include space for these civic amenities and it is imperative that the UDF make specific reference to these amenities at the time of detail design. It must be noted and acknowledged that the surrounding amenities in Kelvin, Buccleuch and Alexandra like schools, libraries, police stations and clinics among others, have been in use for many years and are over capacitated. With the development of Frankenwald, it is necessary to add these amenities in such a manner that they would service the future residents and also alleviate the pressure from the old existing social amenities currently in Kelvin, Buccleuch and Alexandra.

The plan below is a copy of the approved layout plan in its current form.



Spatial Policies

The importance of spatial policies cannot be over emphasised when developing an Urban Design Framework. As per the status-quo report, the following policies have been used from a regional as well as provincial level:

- Gauteng Spatial Development Framework 2030 released in 2016,
- The Gauteng Integrated Transport Master Plan 25 released in 2013,
- The Johannesburg Growth and Development Strategy 2040 released in 2011,
- The Johannesburg Municipal Spatial Development Framework 2040 released in 2016,
- And the Johannesburg Strategic Integrated Transport Plan Framework released in 2013.

Legislation:

Spatial Planning Land Use Management Act 16 of 2013.

Comments:

The overarching policies governing the development of the Frankenwald site are important to the development of the entire region. Along with this, the favourable development of the city region also adds great value at a Provincial scale. It is important to consider that these policies are later filtered down on a municipal and district scale where other policies are the matrix upon which the objectives of the provincial policies are adhered to.

The GSDF considers the Polycentric Growth Management Model to be best able to address the development objectives and challenges of the Province. The Polycentric Growth Management Model is translated into a network of urban structures (nodes) which are linked together via services/infrastructures. One may look at this model as “a string of beads” where the beads represent the nodes and the string represents the linkages. In terms of the Frankenwald precinct, the area is earmarked/proposed as a minor node which will play an important role in creating or filling in the open spaces along the entire network. It is imperative to understand that this policy shows the important role in the networking and linkage within Gauteng and then to other provinces. Due to this, each node within the network will have a major role to play and therefore importance is placed on the actual character and value brought on by each node. It should be noted that the development of Frankenwald should also exacerbate and allow for surrounding areas like Kelvin and Buccleuch to act as nodes within this network. Although suburban in their nature, these areas act as residential anchors which influence people into wanting to reside within or around them.

It must be considered that although there is no means of measuring whether the policy objectives are being met, it is important that these objectives come to the fore once the site is in use and the relationship between its surrounding sites comes about. Long term management of this area in terms of its future development will be done by the city and the UDF should stipulate a future plan that could assist in containing the development and also show how future development could occur in surrounding areas if the Frankenwald development acts as a catalyst. It must be noted that the draft urban design framework contains a matrix of themes and how each of these are being addressed through policy influence. In later editions of the UDF, we seek more information on how this matrix is carried through and how each of these elements are to be addressed on the ground.

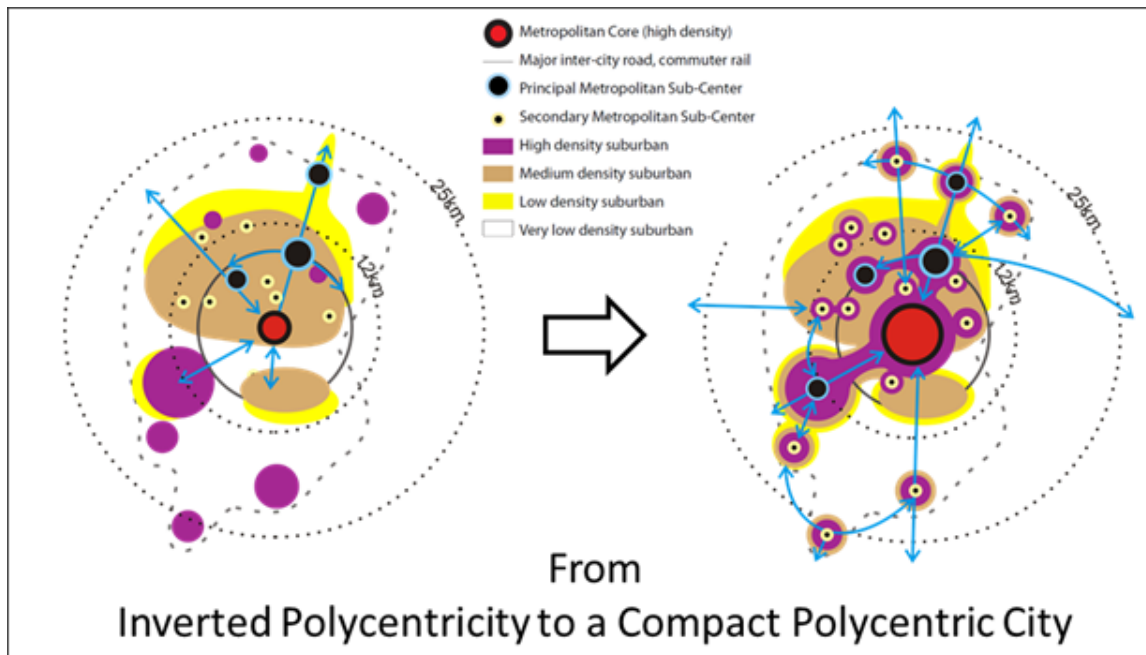


Image 2: the polycentric growth model which is proposed by the nodal review.

Local Context Policies

As mentioned in the preceding sections, all developments are managed with use of policies drawn up by government. Since we operate under three spheres of government which are; National, Provincial and Municipal, it is imperative and we request that the municipal/local level policies are investigated and incorporated into the development plan.

These local policies are;

- Alexandra Renewal Project and UDF(1997)
- Modderfontein Development Framework(2009)
- Marlboro Station UDF(2008)
- Wynberg and Marlboro Development Framework (2009)
- Linbro Park UDF (2008and 2010)
- Waterfall City Masterplan
- Alex City Masterplan

Legislation:

- The City of Johannesburg Land Use Management Scheme, 2018
- The City Of Johannesburg Municipal Planning By-Law

Comment:

The local policies as listed above play an important role in drawing up development objectives for the Frankenwald precinct. As can be gathered from the local policy context, these policies are used in conjunction with each other since their uses and users are directly and indirectly related and dependant on each other. Due to this interdependent relationship between each of the areas, the Frankenwald UDF should be cognizant of these areas, their policies and their overall characteristics. In doing so, new developments should not only stay within the parameters of existing areas policies but should assist in gaining their objectives too. The importance of integrating the Frankenwald development framework with the local policies also makes for certain uses to be spread amongst different areas (eg, employment opportunities available in one area whereas housing opportunities are available in a neighbouring area).

In accordance with the Johannesburg Nodal Review Policy, the UDF is a necessary document that is required to show the development intentions within spaces. The nodal review promotes compact urban form within already developed areas and contains sprawl from outlying undeveloped areas. Due to the location of Frankenwald within the city region, it already shows value in terms of the nodal review since it can be considered as an infill site. Since it is also located amongst many other nodes of different tiers, the site could also be considered as a node in the near future. However, it is imperative that these nodes take into account the actual objectives (eg, walkability) within these designed spaces. It is often seen that developments occur which are appealing towards policy on paper but may not be achieving the correct outcomes on end-user levels.

Since the UDF and the development of Frankenwald will unlock opportunities within the spatial structure of the city, it should also include opportunities for the neighbouring areas. We seek further information on which neighbouring areas will be included within the future proposed nodes and how their inclusion will add benefit to the current residents or property owners.

From a site perspective, the local policies and frameworks also stand as a basis to which development has occurred around the site over the past years. It is imperative that the UDF takes into account as well as stipulates future relationships between neighbouring areas. This step of the process is very important to the future of the area since it takes into account what the overall development objective of the space is and thereafter proposes uses that can be complimentary to the existing uses. Due to the guiding nature of the UDF, it is important that the Kelvin and Buccleuch areas are considered since these areas are directly impacted and abutting the development. As the current amenities,

infrastructure and basic facilities and services of the surrounding areas are fully utilised and in need in certain instances, we would like to see more information on the benefits of the development to all surrounding areas.

With respect to this section, the FDC requests a copy of the Town Planning approvals as it feels prejudiced in providing comment without the holistic view that may be accommodated the all approvals and conditions. This commentary is thus based on what is shown in the UDF and not the actual studies/reports/approvals/applications which we request to be shared and an opportunity to provide input thereon.

Environment

Policy

- Johannesburg biodiversity strategy and action plan 2015
- Wetland Audit
- Catchment Policy
- Johannesburg Metropolitan open space system policy 2004
- Johannesburg Environment Sustainability strategy (final draft 2019)

Legislation

- National Environmental Management Act 107 of 1998
- Spatial Planning and Land-use Management Act 16 of 2013
- National Water Act 36 of 1998
- Regulation Gazette No. 10328, Vol. 594 Pretoria, 4 December 2014 No. 38282
- Environmental Impact Assessment Regulations, 2014

Comment:

We seek confirmation that the aforementioned legislation and gazetted regulations will be complied with in their entirety.

The Jukskei River traverses the Frankenwald site and is a key component of the value of Frankenwald. The biodiversity and protection of the Jukskei remains paramount in respect to the concerns of the surrounding communities. The communities do not wish to see another development bulldoze

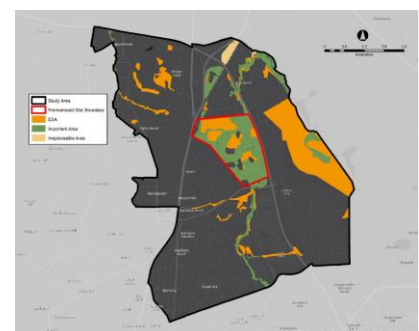
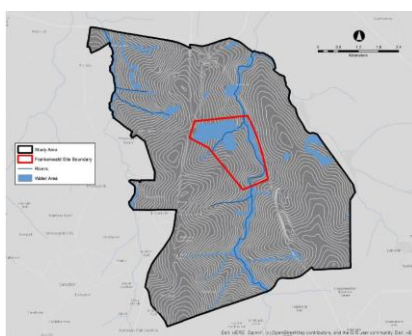
through the few remaining natural resources of the land, without consideration to the protection of the biodiversity of the area, as they have witnessed with other developments.

Various Fauna like the marsh owl and mongoose have been spotted in Frankenwald by surrounding residents. Are these species included in the EIA? With the proposed development, these fauna will be dislocated off their natural habitats. We seek information on the specific measures that will be put in place to safeguard these animals' habitats?

Alternatively, we seek information on what specific measures will be put in place to make sure that these animals are relocated to suitable safe spaces where they can re-establish their natural habitats?

Due to the high impact that climate change has had in the general flow of the Jukskei, it is imperative that any detail design produced incorporates a large buffer area which would cater for flash flooding events that have been experienced in the past. It would also not be advisable to channel or canal the natural system as has been done on many projects of a similar nature, this actually ends up harming the riparian system, fauna and flora over time.

Every year, during the rainy season, a number of kids and families lose their lives in the Jukskei due to flash flooding events downstream from Frankenwald. Buccleuch is also severely affected by flooding every rainy season, with one of the two bridges into the suburb rendered impassable every year. In this instance a 1:100 flood-line may not be adequate enough to mitigate flash flooding. Along with this, the new development will further exacerbates this problem since Buccleuch lies downstream from Frankenwald. It is thus requested that any studies pertaining to the Jukskei strictly deal with the high possibility of flash flooding within Frankenwald and that one ensures that the engineering storm water solution enhances capacity and does not impede on the stormwater services of Buccleuch and Kelvin. The catchment policy as well as the stormwater management plan should play a major role in protecting the aquatic resource and should be done in consultation with the environmental consultant as well as engineers. A thorough investigation should also be carried out prior to allowing stormwater to flow into the river. This investigation should delve into options of water treatment so that the runoff can be treated and slowly allowed back into the river instead of being wasted and adding to flooding problems.



Phone- 083 264 2799

As one drives from the N3 highway along Marlboro Drive looking into the Jukskei, one can see the litter that gets dumped in the Jukskei which collects along the rocks. In order to protect this scarce resource as well as to enhance the ecological profile of the Jukskei it is recommended that design solutions, such as litter traps, be implemented that traps and removes litter in the Jukskei. In conjunction with this it is recommended that provision is made for a formal or sustainable informal recycling facility that will remove accumulated litter from the river and feed it back into the City's recycling infrastructure. The facility could be further integrated with roadside waste pickers and could act as a formal waste collection plant. It is understood that pollution takes place along the entire river system, however Frankenwald has the capability of aiding the valuable riparian resource and the associated biodiversity by incorporating careful consideration in the planning of the development.

Insofar as resource security and environmental security is concerned, it's imperative that the Jukskei while being protected, also serves as a benefit to the surrounding communities. This could either be done through the preservation of the Jukskei in terms of creating a pathway/hiking trail along the Jukskei to the incorporation of agricultural food programs along the river. The Jukskei could serve as an educational element to further preserve and teach the future generations about environmental sustainability and the vast species of animals and grasslands found within the Frankenwald site. The possible existence of red data species also proves that the site is still environmentally suitable to provide habitats for flora and fauna. The development of this land may mean that these red data species, if found, are moved or transplanted to other locations. If these species can be incorporated into the design of the settlement as well as used as elements for education and publicity, there could be a chance that the development and the environment could exist harmoniously.

The topography of the Frankenwald site is unique in nature with various hills and ridges located on site. Any design framework developed for the site should ensure that views and vistas of the area are not distorted but instead, tapers into the surrounding urban landscape. Due attention should be given toward the interfaces between existing areas and the future Frankenwald development.

The UDF makes mention of a Geotechnical report done by SRK Consulting indicating that various zones might not be developable due to geotechnical constraints. We request that this report be made available to the FDC. The geotechnical report presented in the UDF shows the underlying rock, however a key/legend indicating the types of uses the underlying rock can capacitate will be better understood.

In conclusion to this section, the FDC requests that they formally participate in all environmental studies that are in process insofar as the Frankenwald Development is concerned. This includes any studies done to cater for the proposed EIA authorisations that might be needed for the development in terms of NEMA and the Water Act.

The FDC requests to be informed should any part, portion or component of the EIA regulations of 2014 be chosen not to be adhered to, implemented or complied with, as well as the rationale therefor.

All process and studies that have been carried out in terms of the EIA regulations 2014, and their respective approvals, along with any Environmental Management Programme should be made available to the FDC in order for them to understand any the mitigating factors put in place to assist and maintain the natural elements on site. It is understood that an original EIA or scoping was carried out at the time of the town planning application being submitted, however with the changes being proposed and further studies being carried out, it is crucial for the FDC to know whether the EIA will be reviewed and updated for the purposes of the new proposed Frankenwald development.

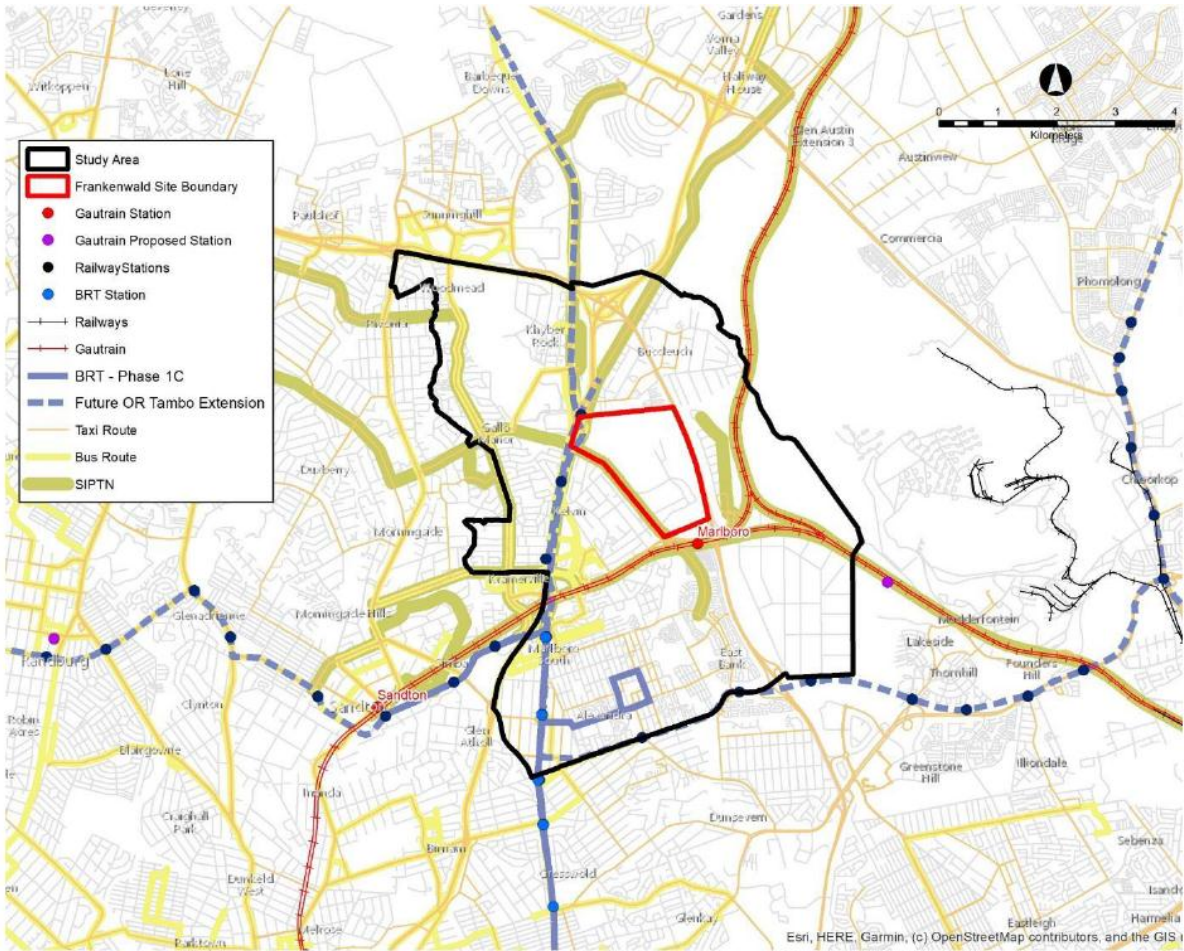
Transportation

Policy:

- Johannesburg Strategic Integrated Transport Plan Framework
- Johannesburg SDF 2040
- Johannesburg Strategic Integrated Transport Plan Framework (SITPF) 2013
- JRA Design standards

Legislation:

- National Land Transport Act of 2009



Comment:

Frankenwald is in a unique position by virtue of being located between the N3 eastern bypass as well as close to the N1 highway and the M1. Frankenwald also abuts one of the most sought after transportation nodal infrastructure in the province, the Marlboro Gautrain Station. Frankenwald is also bordered by Marlboro Drive in the south and Old Pretoria Road to the North.

Mastiff Road Link

Page 54 of the draft UDF refers:

“There is an opportunity to implement an east-west link through the site, connecting to the east using a viaduct under the N3 freeway and a road reserve that has been maintained within Linbro Business Park. This link ties in with the planned Mastiff Road link through Modderfontein and has an intersection with the K113 through Longlake in Modderfontein.”

It’s imperative that the FDC be able to access the TIA and recommendations for interconnectivity within the site as the east-west road link would directly impact the Residents of Kelvin and possible road closures which are currently in place. The FDC furthermore needs clarity as to the usage or inclusion of Northway Road in the proposed Frankenwald development, currently Northway road experiences traffic during peak times and would not be able to accommodate the additional populace envisaged by the development without upgrading.

The Kelvin community has applied for and implemented road closures on Coneway, Eastway and Fairway and would therefore oppose any development which impacts on these road closures in any way, as they are a key contributing factor to keeping their community safe.

It is requested that the FDC be presented with the plan as to how the construction or upgrading of roads will take place as well as any strategies in place to avoid exacerbating the traffic already experienced by current residents.

Along with this, the FDC request details of the plan pertaining to the construction process itself which sets out the movement of materials and labour during the development in a manner which will not affect the safety and rights of movement of residents.

Gautrain

Page 58 of the UDF refers:

“The average monthly household income of commuters using the Marlboro Station is R26,000 per month. 55% of these commuters earn a R6,000 to R35,000 monthly household income and 41% earn a R35,000 to R60,000 monthly household income. The Gautrain Marlboro Station is somewhat underutilised and therefore has capacity for the development of Frankenwald.”

While the above holds true, the Frankenwald development should ensure that the majority of residential units to be developed on the site should fall within the income class of people who are able to use and access the services of Gautrain. This would ensure ongoing financial viability of the Gautrain Marlboro Station.

BRT

The BRT project of the City has seen a few successes and many failures. Due to burgeoning costs associated with the system, the framework should take into consideration the fact that a dedicated trunk route might never reach Frankenwald while a mixed traffic solution might be still be possible in future. Any scenario modelling to increase densities should consider this fact and likely possibility.

Mini-Bus Taxis

Page 60 of the UDF refers:

“The Frankenwald development will be very dependent on MBT as a public transport mode especially during the initial development stages until higher passenger demands created by the development of Frankenwald justifies higher-order, higher-capacity modes of public transport, such as BRT. It is therefore important that, in the interim, adequate road reserves and flexibility should be allowed within the Frankenwald design to accommodate future higher-order modes of public transport to be introduced at Frankenwald. These higher-order modes of public transport must be integrated and be an extension of the existing Johannesburg public transportation network.”

The design and layout of the Frankenwald development remains a paramount concern. While the notion and reality of accommodating all modes of transport is a novel idea, the reality of actually developing proper facilities such as a taxi rank within Frankenwald by the relevant authority might not actually materialise. It is thus recommended that the FDC participate in all forums regarding the design and layout of the transportation network of the Frankenwald development. Along with this, the nodal review makes it apparent that walkability is of paramount importance, would the development create

a live-work-play scenario? Or do future residents have to travel to work and the area just be considered as a node so that it may enjoy density allowances?

NMT (Non-Motorised Transport)

NMT facilities such as walkways should be encouraged within the urban design framework so as to build a coherent and healthy neighbourhood worthy of the residents who live in it. Cycle lanes would serve as a great advantage to people travelling to work across from neighbouring communities to nodes such as Woodmead and Waterfall while reducing their carbon footprint and the need public transport.

All entrances and exits into and out of Frankenwald should also be clearly indicated on all detailed design maps to come. Buccleuch residents are concerned about proposed direct road connections between Buccleuch and Frankenwald due to current concomitant security risks, poor road conditions and high traffic impact rates. In conclusion to the above, it is crucial that the detail design phase take into account the current setting and usage of all road networks surrounding the site. A map should be provided to the FDC that indicates all entrances and exits to and from the site so that these residents can be certain as to where routes could be affected or not. With respect to this section, the FDC formally requests a copy of all TIA reports maps and studies dealing with movement and transportation that have been completed thus far.

The FDC feels prejudiced in providing comment without the holistic view that may be accommodated with all approvals and conditions. This commentary is thus based on what is shown in the UDF and not the actual studies/reports/approvals/applications which we request to be shared and an opportunity to provide input thereon.

Municipal Services and Social amenities

It is understood that the engineering services reports were done in the past and need to be updated. It is imperative that the Kelvin and Buccleuch residents are given the opportunity of reviewing these reports. The reports inform the decisions being made in terms of the development and should be made available to the public, otherwise they feel prejudiced by not having this information available to comment on. These areas are already facing water and sewer issues due to illegal increased density developments within their areas and would not want to bear the burden of further developments tapping into already strained systems.

At this point it is accepted that updated reports will be required by the respective municipal entities for scrutiny and approval. All engineering standards and regulations should be strictly adhered to in order to avoid major issues in the future. All precautions should be taken with regards to the services that are currently traversing the Frankenwald site.

Sustainable methods of service provision should also be looked at in greater detail, this would assist the Frankenwald development and surrounding areas over time. Since this can be considered as a greenfield site, it should be realised that the urban footprint of the entire city region will be increased, due to this, the design framework should include greening elements within the urban environment as well as architectural typologies which include 'green technologies'.

With respect to this section, the FDC requests copies of the Bulk Services reports completed previously in lieu of the original approval as well as the latest bulk services reports since this commentary is based on what is shown in the UDF and not the actual studies/reports. Along with these reports, a clear and understandable document should be made available pertaining to the inclusion of social and civic amenities. The FDC feels prejudiced in providing comment without the holistic view that may be accommodated with all the reports.

Social amenities are another important aspect that needs to be considered and addressed. Within the Frankenwald UDF, reference is made to schools and a few amenities like a library which will be developed (Section 3.2.2). It is of paramount importance that these amenities and facilities be proposed in accordance with the standards and regulations stipulated by the Red Book, alternatively, the UDF needs to consider that the development is proposed to be in line with the nodal review, in accordance with this, many of these amenities will need to be developed within walking distance from residents in Frankenwald. The layout/detail design phase should earmark these sites as well as stipulate the rationale behind their provisioning and situation. In this way the necessary amenities will be developed in creating a sustainable human settlement.

As requested above, the red book should be used to justify the need/no need for amenities to be built on site. Amongst these facilities a cemetery will be an important facility since the existing cemeteries are already up to maximum capacity and also these cemeteries are not situated in the nearby surrounds. If Frankenwald caters for a cemetery it would also aid the surrounding residents to a great extent. As mentioned earlier, current schools are fully capacitated and with the proposed population, new schools should definitely be included.

Another crucial civic amenity that needs to be included in Frankenwald is a medical facility. There is currently only a primary health day clinic situated in Alexandra; however with the large population it services, only some residents of Alexandra are able to use this facility and it is utilised to capacity. Including a hospital in Frankenwald will greatly benefit Frankenwald as well as surrounding areas. Not providing for this basic need will only impoverish the facilities of surrounding areas, creating further strife instead of a better life for all.

In accordance with sustainable development and concepts pertaining to compact development, these amenities and facilities are necessary within easy access to people. The development of Frankenwald has an opportunity to utilise these concepts to implement sustainable development.

The construction of a police station will be critical since the existing police stations are all located at a distance from the site. The closest police station is situated in Buccleuch but is currently not in use and therefore residents surrounding Frankwenwald use the Gallo Manor Police station. Since the development proposes to be in line with the nodal review, it is imperative that all facilities, amenities and services are gained with ease of access and preferably within walking distance from residents.

The FDC would like to bring the attention of the developers to volunteer community services in the area being carried out by the Sandton Guardians which currently support the Kelvin and Buccleuch communities. The Sandton guardians have already established networks and linkages with all security companies and police within the region. They have access to real time information and are updated on all incidents of crime that take place. Currently the Kelvin and Buccleuch residents play an active role in this organization as well as in combatting crime within their respective areas. It is imperative that the future Frankenwald residents are made aware of the efforts of the Sandton guardians so that they may offer their time towards this cause. We request that this be made known from the design stage so that the current security structures and crime prevention techniques are not disjointed by the Frankenwald development. Along with this, the design and construction of the site should include the installation of ANPR (automated number plate recognition) camera's on all major routes in and out of Frankenwald. The ANPR cameras should be fitted with software that references the SAP and Unicode databases in real time. The system should provide a feed to the Sandton Community Policy Forum Guardians as Frankenwald will fall under Sandton policing precinct. This initiative is also a means of promoting social cohesion between the respective communities which is critical to the sustainability of the development and also critical to ensuring that current community initiatives to protect themselves are not adversely affected by the development.

Housing

Policy:

Johannesburg Growth and Development Strategy (JGDS) 2040

Breaking New Ground

Legislation:

Constitution of South Africa

Rental Housing Act

Comments:

Housing is a basic right according to the Constitution of South Africa. Along with this, residential home owners also enjoy benefits of knowing that their properties are fixed assets which will be a beneficial investment through time. Due to this, it is important for developers and government alike to realise that there is the harsh reality of the NIMBY effect. NIMBY refers to- Not In My Backyard, which is a phenomenon that is known worldwide. It has created major societal upheavals and creates harsh disparities within city regions. This generally occurs where property owners of bonded housing live in generally low density developments where the necessary services and amenities are not available at all times. When state intervention housing is proposed, densities go up to amounts of 200-250du/ha. When comparing 40-60du/ha with 200-250du/ha, one understands the vast difference being created from the onset. At a later stage, there is not much attention given to already existing areas in terms of their density allowances which makes owners despondent to invest and live in these areas anymore. Due to this there are constant societal battles and many residents feel that they are being treated unjust. At the phase of creating guiding policies like the UDF, design consultants should make necessary inputs with regards to the future development of surrounding and neighbouring areas. It should also include allowances in terms of increased densities and mix uses for small scale investments aimed at surrounding owners so that they can respond to design guidelines created in the UDF.

Within the housing market there are three tiers of housing delivery. Housing is provided by the South African government to low/no income earners and makes up the BNG or fully subsidised housing component. The next tier is the middle income or 'GAP' market which makes up the affordable housing market where earners can afford a monthly rental or pay-back agreement. Lastly the bonded

market applies to middle-high income earners which purchase homes by virtue of loaned money from financial institutions.

The UDF should make it clear what typologies are being proposed in terms of the earning categories. According to the development scenarios Section 3.2, there are only bonded and affordable units being proposed. This would be preferred by the surrounding residents since there will be less need for government intervention in the overall development over time. Bonded and affordable markets generally maintain and keep up their developments and areas since there are management bodies which create rules and governing elements. This would also assist in surrounding areas maintaining their property values if not increasing them. Fully subsidised units are not shunned upon by the Kelvin and Buccleuch residents, however it should be made known as to what types of developments will be developed from the onset. The detail design should indicate the areas earmarked for multi-storey development and include information pertaining to; the location, height/floors/storeys, number of inhabitants, and renderings of the building facades.

Although policies point toward higher densities as well as providing housing for the poor closer to the city, it is important to consider that Frankenwald is surrounded by areas like; Woodmead, Kelvin, Alexandra, Marlboro, Wynberg, Buccleuch, Longlake and Linbro Park. Each of these areas are differing in character and hold a variety of users. One should consider how these areas have worked or not worked with each other over time when proposing the housing component within Frankenwald. Along with this, these areas are all low density in nature, except in the case of Alexandra where the densities are high and mostly made up of informal and single storey dwelling structures that are compacted amongst each other. Other surrounding areas are mixed with a larger residential component mostly single storey bonded houses. Recently private owners have been developing their sites into low density communal developments for rental purposes or increased family size. The development of Frankenwald should therefore seriously consider surrounding densities when proposing densities for the area. In many ways the densities proposed can also benefit surrounding areas provided that attention be given to the interphases between them. It should be noted that higher buildings are frowned upon in existing areas with low height restrictions and generally single storey developments. The design framework should give due attention to the interphase between the existing and proposed. It is proposed that higher densities and high rise building be situated away from existing developments and preferably at lower points on the site so as to avoid a disjointed situation regarding the grain and texture of the developments. As mentioned above, incentives should be aimed at surrounding owners

to develop their properties over time which will assist in completing the interphase and transition between Frankenwald and its neighbouring areas.

With respect to this section, the FDC formally requests a copy of the density study, approvals as well as the City's relevant Human Settlement Plan for Alexandra as commentary is based on what is shown in the UDF and not the actual studies/reports. The FDC feels prejudiced in commenting on a framework without the related reports available.

Socio-Economic and Market Study

A read through the findings of the market study suggests that the two best and most profitable land uses for the Frankenwald Development is warehousing and distribution coupled with mix typology walk-ups catering towards the gap market. With the intent of the landowners to maximise profits in order to serve the needs of underprivileged university students in the aftermath of the 'fees must fall' movement, it makes economic sense to utilise the basket of rights that have been approved in a sustainable fashion that includes a commercial aspect such as good located warehousing close to markets. With the advent of the online boom in retail, this could provide desperately needed jobs to surrounding communities in a sustainable manner and not purely from a construction perspective of temporary jobs.

The next best scenario out of the market study suggests a mix-use typology for housing. While the findings suggest a mix typology, the FDC prefers and recommends that FLISP and/or Gap housing coupled with bonded be proposed. Within the larger Sandton/Alexandra area, there is no particular GAP housing development to be proud of apart from Cosmo City located on the western outskirts of the city. This presents a massive opportunity for the developers to embrace the inclusionary housing process by providing much needed good quality, partially-subsidised affordable housing in the Sandton area. This particular target market would increase the ridership of the nearby Marlboro Station, as well as provide homes to those who would be working within the distribution/commercial warehousing as indicated above thus creating a truly sustainable node where people can work, play and live within the confines of their surrounding community.

With respect to this section, the FDC requests a copy of the relevant market studies as this commentary is only based on what is shown in the UDF and not the actual studies/reports. The FDC feels prejudiced in commenting on a framework without the necessary information.

Consolidation of Resident's concerns & questions

The following general enquiries and concerns have been specifically raised by members of the communities involved. The residents request feedback to these enquiries to aid them in better understanding the proposed development and the effect it will have on their existing spaces and in turn their lives, thereby empowering them to provide more valuable input into the process.

1. How will the safety and security of existing surrounding communities be factored into the development plan, without jeopardising the existing road closures in place?
2. What upliftment is planned for Alexandra within the development of Frankenwald?
3. We request that the Frankenwald development be an all-inclusive development with the relevant social amenities such as schools (primary and secondary), playgrounds and sports facilities. What standards and guidelines are being used to justify the need/not for new facilities like schools and hospitals? If the Redbook is being used, please may the FDC be shown how this proposes new social amenities within Frankenwald?
4. In table 12, the UDF makes reference to schools within the "Frankenwald region". Which areas specifically make up this region? Alternatively, is there a map showing the total number of schools within the Frankenwald Region?
5. What social amenities (eg, library, police station, clinic, sports facilities) are being proposed within Frankenwald that would service the greater area?
6. Rehabilitation of the Jukskei remains paramount by virtue of ensuring 'litter traps' and other design features to protect and enhance the Jukskei.
7. Ensure that surrounding suburbs are not negatively affected in the following way:
 - Reduction in current water pressure
 - Sustainable and reliable electricity supply.
 - Reliable storm water and wastewater drains, pump stations, treatment plants and pipelines to ensure that the Juskei is not polluted due to the lack of infrastructure spend on these facilities.
8. Ensure that Northway road is upgraded to cater for increased traffic ensuring that residents living along Northway are minimally affected.
9. What arrangements will be made for residents to access their homes along Northway when it is being upgraded?
10. Please advise on where the access points into the suburb will be located.
11. Please demonstrate how the NEMA regulations of 2014 will be complied with.

12. What incentives are in place to ensure that relevant land parcels will attract private and reputable investment into the area in order ensure the overall upliftment of all communities?
13. How will communities of diverse densities and social economic bases be integrated to ensure harmonious living and working?
14. Please advise on the various housing typologies, the type of housing (FLISP, GAP, fully subsidised) and the number of units proposed of each category, where they will be located, number of storeys, number of inhabitants and a possible rendering of their facades.
15. Please insert definitions page on the document explaining terms, eg. 'affordable housing'
16. Is the UDF being proposing to to keep to within the existing basket of rights or will a new town planning application be lodged, and will the application for new additional rights be open for public participation?
17. Please advise on the components of the development that may support and enrich both Frankenwald residents as well as surrounding communities.
18. Please advise as to how government would be involved in the housing component of the development?
19. If the demarcated land-uses earmarked for business and commercial purposes do not materialise due to a lack of uptake in the free market, how would the development guarantee that the development would remain sustainable and not be converted to housing?
20. How are the landowners and developers going to ensure that no illegal land invasions would occur?
21. Will the rented residential part of the development be managed by any rental agencies?
22. How will the residential sects of the development be managed and up kept so that property values may be maintained?
23. Will a subsequent urban design guideline be drawn up so that the development stays within the parameters of the Frankenwald UDF?
24. Please explain the viability of the nodes being proposed in accordance with the nodal review.
25. What plans will be put in place to secure the area during the development stages? Absence of security will lead to increased crime in Kelvin and Buccleuch.

Document Requests

In lieu of the studies being conducted, please find below a list of documents required from this phase of comments into the UDF. It is Imperative that the FDC be given the opportunity to peruse these documents in order to fully understand the proposed Frankenwald Development and adequately comment in the next round of public participation:

1. Bulk service reports: Water
2. Bulk service reports: Sewer
3. Bulk service reports: Electricity
4. Traffic Impact Study
5. EIA and all related specialist studies ie. Wetland Study etc.
6. Heritage Study
7. Geotechnical Report
8. Market studies