



Westcliff Residents' Association

PO Box 47194 Parklands 2121

1 February 2022

The Director: City Transformation and Spatial Planning
City of Johannesburg
Per email- dylanw@joburg.org.za

Dear Mr Weekly

Comments by Westcliff Residents Association in respect of the draft review Spatial Development Framework 2040

The City is complimented on its review of the SDF 2040 and we thank you for the opportunity to comment. Our comments are short and to the point.

We are concerned that whilst the SDF and Nodal Review are central to determining the City's responses to land use applications, they are both difficult to interpret, because of a lack of integration and inconsistencies in alignment- in this regard the reviewed SDF update hasn't taken their integration much further or resolved the differences between the "development zone" systems used in the two documents.

The interpretation of these dual development zones and guidelines impacts many conventional suburbs like Westcliff. The Nodal Review development zoning suggests that the southern half should be permitted densities of more than 60 dwellings per hectare, and the northern part densities upward of 30 dwelling units per hectare, subject to heritage, infrastructure and environmental considerations.

The update fails to provide an improved explanation of these issues- ie which environmental and heritage policies are currently relevant, what the infrastructural issues are, and how these factors can be combined to better inform the implementation of the development and built form guidelines in Westcliff. The lack of integration of these factors in determining appropriate development guidelines for Westcliff, and the absence of a comprehensive list of aligned and relevant policies in the update, leave the pursuit of these aspects up to the officials and the general public.

Westcliff enjoys a special status given its heritage and environmental significance, which is recognised by the City. It is thus vital to protect the unique aspects of Westcliff rather than promote the one-size-fits-all approach that the SDF update, in its current form, seems to endorse.

We cannot accept an unreasoned and non-specific overlaid approach to densification- and we therefore will insist that the old development table guidelines for our area continue to be applied in all development decisions. These have stood the test of time and there is no rational basis for these to be changed- these guidelines are fully aligned with the objectives of the SDF 2040-

We will accordingly rely on the following principles and we would respectfully request the City to do likewise and accept our position as follows- **Objective:** Westcliff is an ecological and heritage conservation area, and the following development guidelines are to be used in assessing land development applications in addition to the generic Nodal Review guidelines:

- o A site development plan as required in the Environmental Control Area.
- o A 2 000m² minimum erf size for subdivisions,
- o Prohibition of development on slopes of 1:3 or greater,
- o Prohibition on further subdivisions of properties abutting the northern or eastern aspect of the Westcliff ridge (ie east, north or south of Pallinghurst Road, the northern side of Woolston Road, the south side of the Valley Road, and the west side of Jan Smuts Avenue).
- o Apply the heritage property reference list (Ref: NR1-Heritage Sites List - Westcliff), and National Heritage Resources Act requirements.

We repeat our 2020 submissions which are also attached hereto

Yours faithfully,
WESTCLIFF RESIDENTS ASSOCIATION

per PM Jenkins