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To: Mr. Riaan Kuchar (Senior Manager: Town Planning and Property Administration)

Attention: Charlene Pieters

#### COMMENT ON THE DRAFT OVERSTRAND INTEGRATED DEVELOPMENT FRAMEWORK (IDF)

1.1 The draft IDF dated September 2013 and your request for comment and subsequent telephonic conversations has reference.

#### 2. Comments

##### 2.1 Part 1: Introduction

2.1.1 It is acknowledged that the Integrated Development Framework (IDF) is a document which provides a long term spatial vision for the Overstrand Municipality. It appears to be a broad overarching document which provides strategic guidance for spatial, infrastructure and environmental planning. It should be noted that the IDF does not have a specific legislative framework; however, it is imperative that the IDF be aligned with national and provincial planning policy. It would appear that the objectives and principles of the PSDF have been reflected in the document.

2.1.2 The IDF states that planning occurs within the 5 year IDP cycle and that no formal long term planning mechanism exists that provides direction for sustainable spatial growth and development. It should be noted that even though the SDF's are no longer drafted or approved in terms of section 4(6) OF LUPO, the SDF remains a core component of the IDP in terms of Municipal System Act (MSA) and remains the long term strategic spatial planning document which provides guidance for projects and plans linked to the IDP and the municipality as a whole. The IDF does not provide the detailed strategic guidance required from an SDF.

2.1.3 Reference is made to the Overstrand SDF throughout the IDF document; however this is a 2006 document and is relatively outdated. It is understood that the SDF itself will be reviewed using the IDF as strategic guidance. As the SDF is a core component of the IDP, it is imperative that this document remain up to date if it is to provide direction to the IDP projects and plans.

2.1.4 The outline of the Spatial Directives is noted. The Directives are in alignment with Provincial and National spatial planning strategies and policies and therefore provides a clear vision for the Overstrand Municipality and should be fed into the subsequent plans that emanate from the IDF.

## **2.2 Part 2: Overstrand Municipal Area**

2.2.1 This section outlines the current perspective of the Overstrand area in terms of the socio-economic situation, which provides the context for future projections.

2.2.2 In terms of the future housing and land requirements, reference is made to the Overstrand Growth Management Strategy, 2010. It is assumed that the figures provided in this document are based on outdated census information. It might be beneficial to review the Growth Management Strategy using the most recent census data and housing figures in order to provide more accurate housing provision calculations.

2.2.3 In contextualising the Overstrand Municipal area, very little attention is given to the issue of the current housing backlog and addressing the backlog. It would be useful to elaborate on this matter in this section in an attempt to provide a more holistic depiction of the current situation within the area.

2.2.4 In terms of section 2.5 (our natural environment), reference is made to estuaries, wetlands and rivers. It is important that the coastal setback line study is taken into account, as there might be possible implications for these areas.

2.2.5 With regards to sections 2.6 (rural and urban environment) and 2.7 (our infrastructure and facilities), it is apparent that many of the urban nodes have a fairly low permanent occupancy level and developments are generally low density in nature. This could present a challenge in terms of bulk infrastructure. What impact do the low occupancy levels have on infrastructure? It would be beneficial to provide more insight on the matter of bulk infrastructure and provide further perspective on the situation in the Overstrand and its unique settlement patterns.

## **2.3 Part 3: Strategic Framework**

- 2.3.1 This section elaborates on the IDF spatial directives and provides objectives and policies for each directive. Accompanying the IDF objectives and policies are implementation mechanisms and actions. These objectives and policies appear to be in line with the objectives and principles of the PSDF. It should, however, be noted that some of these mechanisms and actions are only in the investigation phase and may not be implemented at all.

## **2.4 Part 4: Integrated Spatial Development and Environmental Framework**

- 2.4.1 This section provides the spatial depiction of the IDF objectives and principles for each town. It should be noted that these IDF objectives and principles are broad and overarching and does not provide the spatial direction one would obtain from an SDF.

- 2.4.2 The following are general comments with regards to plans for each town depicted in part 4 of the document:

- It would be beneficial to indicate possible opportunities for residential development. This would provide an idea of the amount of land available for both private and subsidised housing opportunities.
- It should be ensured that the coastal setback line study is consulted for all coastal towns as this document might have possible planning implications.
- Where mixed use and high density residential development is proposed in rural areas, more detail should be provided on the types of housing that would be desirable in a rural setting. The issue of high density housing in rural areas should be expanded on in the document, as a rural area may have a certain character that would need to be taken into consideration.
- Commercial development in urban, suburban and rural areas should be elaborated on and clarified, as scale and types of commercial activities should vary depending on the location.