



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

Case ID 1500161127

**Erf 9702, 10 Affodil Street, Ruwari,
Brackenfell (Stellenbosch)**

Development Management

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ERF 9702 BRACKENFELL SOUTH

**Departure Applications to Facilitate a
Mix of Market-Related Affordable Housing**



**PROFESSIONAL
PLANNERS**

June 2026

Revised: 15 July 2026

Revised: 06 August 2026

ERF 9702 BRACKENFELL SOUTH

Departure Applications to Facilitate a Mix of Market-Related Affordable Housing

Prepared by:



PROFESSIONAL
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CONTENTS

1.0 INTRODUCTION

- 1.1 Site Location
- 1.2 Development Typology Proposed for Erf 9702 Brackenfell South
- 1.3 Application and Properties Details
- 1.4 Summary of Development Proposals and Land Use Applications

2.0 CONSIDERATIONS FOR AN APPROPRIATE ENVELOPE

- 2.1 Street Setbacks
- 2.2 Frequency of Street Accesses
- 2.3 Building Heights
- 2.4 Design Informants/ Indicators

3.0 DEVELOPMENT PROPOSALS

- 3.1 Development Objectives and Building Proposals
- 3.2 Elevations
- 3.3 Vehicular and Pedestrian Movement
- 3.4 Landscaping Proposals

4.0 DEVELOPMENT APPLICATIONS

- 4.1 Departure: Height
- 4.2 Departure: Parking Bays
- 4.3 Departure: Carriageway-Crossing

5.0 MOTIVATION IN SUPPORT OF THE DEVELOPMENT PROPOSALS

- 5.1 Section 99(1): Applicable Spatial Development Frameworks and Policies
- 5.2 Section 99(1): Effect of the Departure Application
- 5.3 Section 99(2): Impact on Existing Rights
- 5.4 Section 99(2): Legal considerations (national and provincial)
- 5.5 Legal Considerations (national and provincial)
- 5.5 Section 99(3): Desirability Criteria

6.0 SUMMARY & CONCLUSION

LIST OF FIGURES

- Figure 1.1: Locality Plan
- Figure 1.2: Property Concerned

Figure 1.3: Extent of Land required to Accommodate 39 816 families

Figure 2.1: Building street setbacks

Figure 2.2: Access Points

Figure 2.3: Section AA (current)

Figure 2.4: Section BB (West)

Figure 2.5: Section BB (East)

Figure 2.6: Design Informants

Figure 3.1: Building Locations

Figure 3.2: Recreational Spaces

Figure 3.3: Oblique from the north-west, showing taller structures adjacent to Kruis Riad and the stormwater pond (Source: JSA Associates)

Figure 3.4: Oblique view from the south, showing how the development steps up in height from Affodil Street to Kruis Road (Source: JSA Associates)

Figure 3.5: Site Layout (Source: JSA Associates)

Figure 3.6: West elevation showing the affordable housing buildings from Kruis Road (Source: JSA Associates)

Figure 3.7: East elevation showing the market rental units along Affodil Street (Source: JSA Associates)

Figure 3.8: North elevation showing the affordable rental units facing the proposed stormwater pond (Source: JSA Associates)

Figure 3.9: South elevation looking at the proposed 2-storey buildings from Erven 11135 and 11136 (Source: JSA Associates)

Figure 3.10 Access, Parking and Circulation

Figure 3.11: Main vehicular entrance and exit gate (Source: JSA Associates)

Figure 3.12: Elevation of the vehicular entrance and exit gate

Figure 3.13: Edge treatment along Affodil Street of Market Rental Units With Driveways (Source: JSA Associates)

Figure 3.14: Edge treatment along Affodil Street of Market Rental Units Without Driveways (Source: JSA Associates)

- Figure 5.1: Spatial Transformation Areas
 Figure 5.2: Northern District Plan
 Figure 5.3: Street interface along Affodil Street
 (Source: JSA Associates)
 Figure 5.4: Street interface further along Affodil
 Street (Source: JSA Associates)
 Figure 5.5: Street interface further along Kruis
 Road (Source: JSA Associates)
 Figure 5.6: Internal recreational space for
 residents (Source: JSA Associates)
 Figure 5.7: Aerial Photo (2025)
 Figure 5.8: Local Context
 Figure 5.9: Current Zoning
 Figure 5.10: Proposed Building Setbacks
 Figure 5.11: Section AA (future)
 Figure 5.12: Public Transport
 Figure 5.13: Facilities and Services

LIST OF PHOTOS

- Photo 1: Typical house setback to the east of
 Affodil Road.
 Photo 2: Typical house setback to the west of
 Affodil Road.
 Photo 3: View along Reservoir Road looking
 south-west across the site.
 Photo 4: View along Kruis Road looking north-
 east across the site.
 Photo 5: View along Affodil Street looking
 north-west across the site.
 Photo 6: View looking north from Reservoir
 Road looking towards the Brackenfell
 Traffic Department.
 Photo 7: View looking north-east from
 Reservoir Street towards the
 industrial area.
 Photo 8: View looking east from Kruis Road
 looking towards the houses facing
 Kruispad Service Road.
 Photo 9: View along Kruis Road looking
 towards the food outlet (KFC) and
 service station (Engen).
 Photo 10: View further along Kruis Road looking
 towards the retail shops.
 Photo 11: View along Affodil Street looking
 toward Erf 1871.
 Photo 12: View looking east down Eikenhof
 Street.

- Photo 13: View of the common boundary with
 Erven 11135 and 11136 Brackenfell
 South.

LIST OF ANNEXURES

- Annexure 1: Ruwari Market Feasibility Study
 Annexure 2: Power of Attorney
 Annexure 3: Ownership Printout
 Annexure 4: SG Diagram
 Annexure 5: Title Deed (T24701/2023)
 Annexure 6: Conveyancer Certificate
 Annexure 7: Zoning Certificate
 Annexure 8: Land Use Application Form
 Annexure 9: Proposed Architectural Plans
 Annexure 10: Water and Sanitation Capacity
 Report
 Annexure 11: NID Outcome
 Annexure 12: Electrical Feasibility Report
 Annexure 13: Traffic Impact Study (August
 2024)
 Annexure 14: Traffic Impact Assessment Review
 (June 2026)

1.0 INTRODUCTION

The City of Cape Town intends to facilitate the development of a mix of market-related housing and affordable rental accommodation units on Erf 9702 Brackenfell South in the suburb of Ruwari.

Erf 9702 is ideally suited for multi-storey residential accommodation: the site is located on the edge of a residential suburb adjacent to busy roads, is suitably zoned and is intended for 'high density residential development' under the District Plan. The City's approach to the future of this site, in the context of an accommodation need, could be to release the land to developers for private development under the current zoning; or the City could define a development envelope and intensity that is appropriate to the site. The latter option was considered more appropriate since it establishes a clear development envelope (how high, how far from edges, etc.) and number of units. When the site is released to the development market for development, the bidding developers will then have a clear understanding of outer and upper limits of development.

Of course, another option is to leave the property vacant. This option would not be considered rational in light of the accommodation shortage in the local area / wider city, and the limited amount of publicly owned land in the city. This would also be untenable in light of the responsibilities of local government to address the needs of its citizens.

It is within this context that JONO Trust Professional Planners was appointed as urban planners responsible for preparing and managing the process to establish an appropriate development envelope with development intensity.

1.1 Site Location

Erf 9702 Brackenfell South (the site) is located at 10 Affodil Street, Ruwari. The site is bounded by Reservoir Street to the north, Affodil Street to the east, a mix of business (KFC) and residential use (dwelling units) to the south and Kruis Road to the west.

The site is adjacent to a key north-south link (Kruis Road) that connects Old Paarl Road to Bottelary Road in the south.

The Brackenfell Public Transport Interchange (PTI) and Brackenfell Railway Station are approximately 1,5km to the north-east of the site (refer to **Figure 1.1: Locality Plan**).

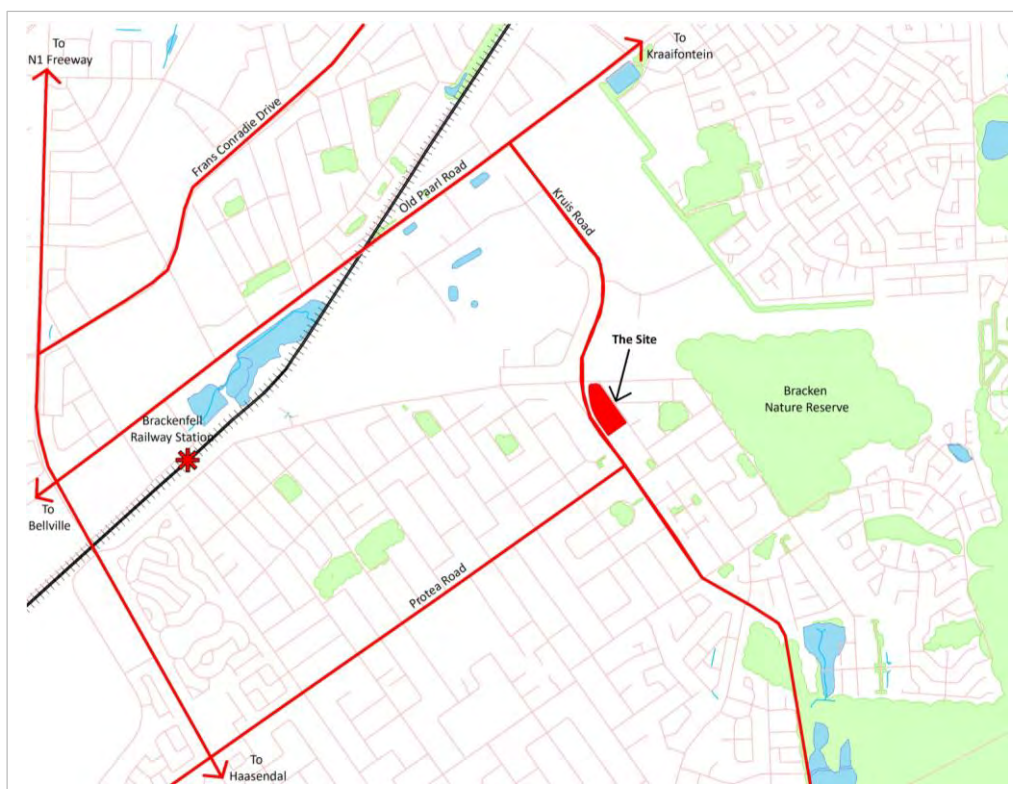


Figure 1.1: Locality Plan

1.2 Development Typology Proposed for Erf 9702 Brackenfell South

Affordable Housing is a housing tenure product that caters for households earning between R3 500 a month and the upper threshold of the Financial Sector Code Affordable Housing Standards, pegged at R34 800. These thresholds are subject to annual inflation adjustments, as per Council adopted definition for Affordable Housing, by Resolution (C13/01/23).

Affordable Housing is the umbrella term used to describe the supply of housing and accommodation to families who earn between R3500 to R34 800 per month. Affordable rental, GAPP and FLISP falls within this category.

The City of Cape Town's Integrated Human Settlements Five-Year Sector Plan 2022/23 – 2026/27: 2025/26 Review (Annexure to the IDP 2022/23 -2026/27) and Northern District Plan (2023) follows the Financial Services Charter definition of 'affordable housing', with the District Plan (2023) stating: 'any housing provision that complies with the definition of the financial services sector, annually updated by using the mid-point between the consumer price index and building cost index, is considered as affordable housing in terms of the MSDF'.

The affordable housing market income definition is reviewed annually by the Banking Association of South Africa in line with the prescriptions under the Financial Services Charter. All financial institutions are required to make the necessary adjustments. For 2026 the Affordable Housing market was calculated by The Banking Association to comprise households earning a gross income of R3 500 to R34 800 per month.

This means that affordable housing market accommodation is ideally suited for people who work in the following professions, where average gross incomes allow them and their families to benefit:

Profession	Average Salary
IT Support Technician	R25 000
Architectural Technologist	R25 000
Plumber	R22 500
Electricians	R20 000
Sales manager	R20 000
Police officers	R17 567
Real Estate Agent	R15 000
Administration clerk	R12 000
Bookkeeper	R12 000
Graphic Designer	R12 000
Table 1: Source: https://za.indeed.com › l-south-africa-jobs	

- **Local Area Demand for Affordable Accommodation:**

A key question is whether there is sufficient demand for affordable market housing accommodation in Brackenfell and the surrounding areas. A market study (refer to **Annexure 1: Ruwari Residential Market Feasibility (Update) 2026**) was undertaken to consider this question.

The study, which was first undertaken in March 2024 and then updated in May 2026, found that:

- Brackenfell's smaller average household size (2.6) supports demand for compact, higher-density affordable units such as GAP housing and affordable rental units, well-suited to mixed-market typologies. Above-average population growth (2.0%) signals sustained demand for new housing supply, strengthening the feasibility and absorption potential of an affordable housing component.
- A higher share of working-age adults supports demand for rental and ownership products targeted at economically active households, particularly affordable-market units suited to stable, mid-income earners. The relatively low proportion of children reduces pressure for large family-oriented units, favouring smaller, lower-maintenance typologies.
- Brackenfell's combination of very low unemployment among economically active residents and a sizable non-working population supports demand for mixed affordable housing from both stable, middle-income workers and economically dependent households. This environment favours a product mix that includes affordable units for employed households alongside smaller, lower maintenance options attractive to pensioners, students and homemakers, provided affordability and proximity to services are maintained.
- High levels of secondary and tertiary education indicate a skilled, middle-income market with stronger earning potential, supporting demand for affordable housing/ rentals and competitively priced ownership units. The dominance of matric and post-school qualifications aligns with demand for quality, well-designed units with good connectivity to employment nodes, rather than basic entry-level housing. Low levels of limited schooling suggest minimal demand for deeply subsidised housing, reinforcing a mixed-market approach weighted toward affordable houses and rental units.
- A strong concentration of middle-income households supports a mixed market development anchored in affordable middle-income typologies, including gap housing and rental units. The limited share of no- and very-low-income households reduces reliance on fully subsidised units, enabling a financially viable model driven primarily by affordable rental and bonded. A small but present higher income segment allows for limited inclusion of higher spec units.
- Service oriented expenditure patterns, with a significant share allocated to rent (21% of service spend), highlight affordability sensitivity to housing costs, supporting demand for well-priced rental and ownership units in a mixed market development. High spending on transport (18%) and other services reinforces the importance of location efficiency, favouring developments with good access to employment nodes, public transport, and daily amenities to reduce household cost burdens.
- Brackenfell's existing housing mix, with a strong presence of flats (13,1%) and townhouses (18,3%), demonstrates established market acceptance of medium density typologies, supporting rollout apartments as well as compact estate developments. The very low levels of informal and backyard dwellings indicate limited demand for informal or subsidised housing, reinforcing a focus on formal, market-driven affordable and gap housing products. A tenure profile dominated by bonded ownership (43%) and a substantial rental market (37%) supports a balanced mixed tenure approach, combining affordable ownership and rental units to align with financially active, credit engaged households.
- For a mixed affordable housing project in Brackenfell, this economic structure implies a relatively resilient labour market with multiple employment niches across services, logistics, manufacturing and public/community sectors, reducing dependence on a single industry and supporting stable rental and ownership demand over time. It also suggests that households working in these sectors are likely to value proximity to jobs, transport routes, and retail/service nodes, reinforcing the attractiveness of Brackenfell as a location for affordable and gap market units that offer reduced commute times, predictable housing costs, and access to everyday amenities.

- The Net Effective Demand assesses the market gap for new residential housing development within the defined market area (PMA and SMA). It indicates the local market's capacity to absorb additional bonded and rental housing, considering future supply to ensure a realistic and accurate projection. The table below highlight the NED figures for both bonded and rental housing in the area.

Table 1: NED for Bonded Housing (Source: Urban-Econ)

Year	BONDED				
	Subsidised	FHF	Affordable Housing	Middle Income	High Income
2026	258	225	337	97	174
2027	362	322	536	153	280
2030	794	726	1 257	387	723
2035	1 376	1 269	2 226	702	1 318
2040	2 006	1 856	3 275	1 043	1 962

The table below will focus on the NED for the different rental housing typologies within the delineated market area:

Table 2: NED for Rental Housing (Source: Urban-Econ)

Year	RENTAL				
	Social Housing Primary Market	Social Housing Secondary Market	Affordable Housing	Middle Income	High Income
2026	62	187	179	49	89
2027	86	272	270	80	148
2030	185	624	649	209	393
2035	317	1 097	1 158	382	723
2040	460	1 610	1 710	569	1 080

Based on the tables above, there is clear evidence of strong demand for bonded and rental housing to support the proposed development of 31 private market (GAP housing) units and 115 affordable rental units.

- City-wide Demand For Affordable Accommodation:**

There is a significant need for accommodation in the R3 500 to R34 800 per month income at a city-wide level. The City of Cape Town's Human Settlements Strategy (May 2021) estimated that there are approximately 18 663 – 22 411 new housing opportunities required each year till 2028 to address the needs of the families in this income bracket.

If this significant demand (a total of 130 641 to 156 877 units over 7 years) was to be accommodated at a reasonably modest 150du/ha, then between 870ha and 1032ha of land would be required to accommodate these families.

870 Hectares of land is the equivalent of approximately 24 times the area of the Bracken Nature Reserve (36ha). 1032 Hectares of land is the equivalent of approximately 28 times the area of the Bracken Nature Reserve (36ha).

Given that there are very few parcels of public land of this size, it is prudent to identify smaller parcels of well-located public land for the development of accommodation. Erf 9702 Brackenfell South is ideal for the development of accommodation because it is large enough to create a financially viable development, it is adjacent a public transport route, and it is located on the edge of a residential area adjacent to an industrial-zoned area.

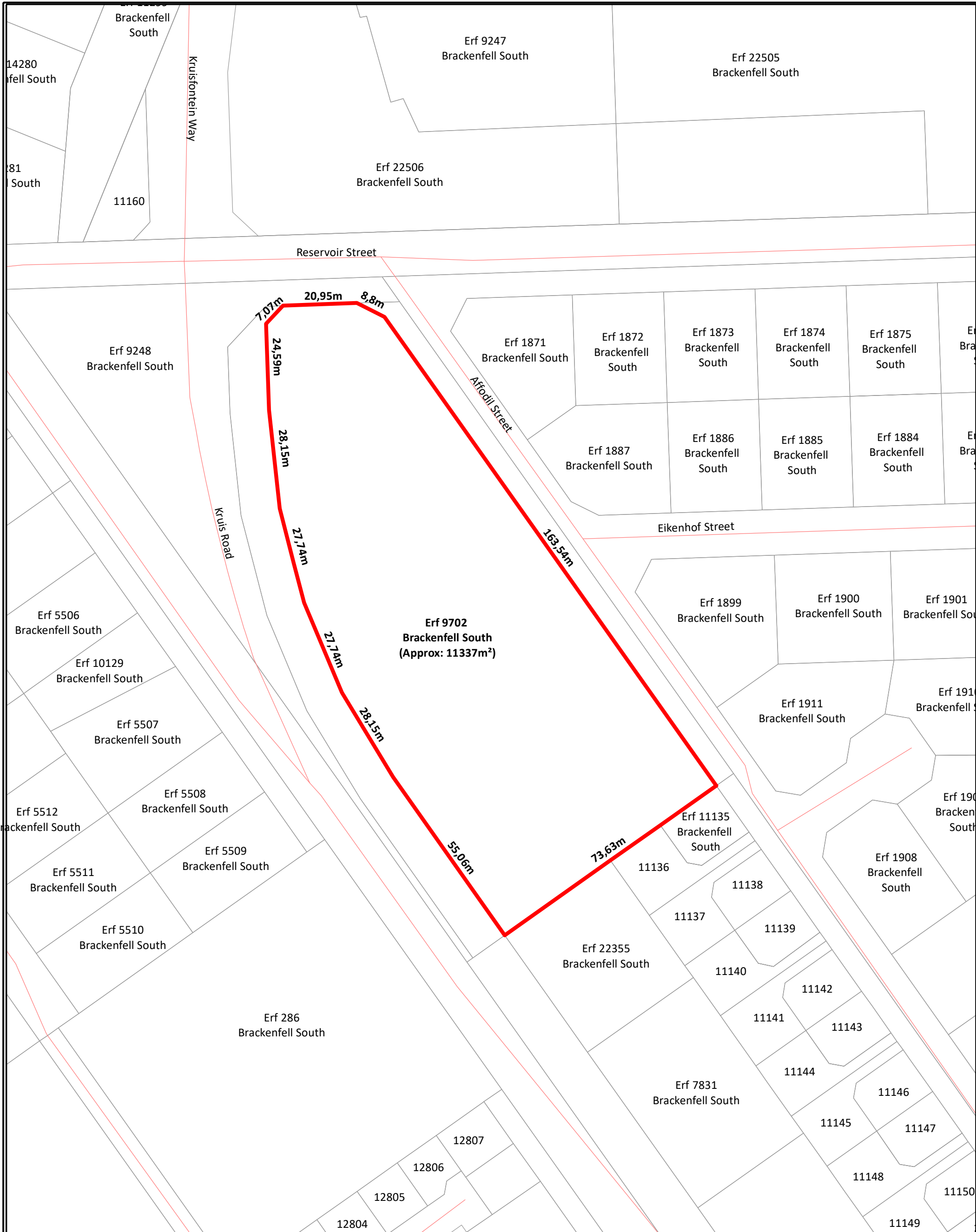


**24 - 28 times the area of
Bracken Nature Reserve**

Figure 1.2: Extent of Land required to Accommodate the R3 500 to R34 800 per month income bracket over 7 years

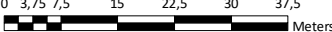
1.3 Application and Property Details

Applicant	JONO Trust Professional Planners (refer to Annexure 1: POA)
Property Descriptions	Erf 9702 Brackenfell South (refer to Figure 1.3: Properties Concerned)
Registered Owner	City of Cape Town (refer to Annexure 2: Ownership Printouts)
Extent	Approx. 1.334ha (11337m ²) (refer to Annexure 3: SG Diagram)
SG Diagram #	LG#348/1991 (refer to Annexure 3: SG Diagram)
Title Deed #	
Restrictive Title Conditions	None (refer to Annexure 5: Conveyancer's Certificate)
Applicable Zoning Scheme	City of Cape Town Development Management Scheme
Current Zoning	Local Business 2: Local Business (refer to Annexure 6: Zoning Certificate)
Land Use:	Vacant



Key

-  Site Boundary:Erf 9702 Brackenfell South (Approx:11337m²)
-  Surrounding Properties
-  Street Centrelines
-  -

Erf 9702 Brackenfell South		1.3
PROPERTY CONCERNED		
SCALE at A3 1:1 000		
JONO TRUST		
Job: 26.377	Mxd: Property Concerned	Date: 30 April 2026

1.4 Summary of Development Proposals and Land Use Applications

This application report concerns Erf 9702 Brackenfell South, which is zoned Local Business 2: Local Business.

The following applications are made in terms of Section 42(b) of the City of Cape Town Municipal Planning By-Law (2015, as amended):

- **Height departure**

An application to depart is made in respect of item 56(c) (i) of the DMS to permit the height of the new 4-storey buildings 12,34m in lieu of 12,0m. The height departures are only applicable to the taller buildings adjacent to Kruis Road.

The departure application is made in terms of item 42(b) of the City of Cape Town Municipal Planning By-law (2015).

- **Parking departure**

Depart in respect of item 137 of the DMS to permit 127 bays in lieu of 146 (shortfall of 19 bays).

The departure application is made in terms of item 42(b) of the City of Cape Town Municipal Planning By-law (2015).

- **Number & spacing of CWC departure**

An application is made to depart in respect of item 140(2)(b) of the DMS to allow more than 2 carriageway crossings to Erf 9702 Brackenfell South, and to allow CWCs to be less than 12,0m apart:

- o CWC 2 to be 9,5m away from CWC 3 in lieu of 12m.
- o CWC 3 to be 9,4m away from CWC 4 in lieu of 12m.
- o CWC 4 to be 2,5m away from CWC 5 in lieu of 12m.

The departure application is made in terms of item 42(b) of the City of Cape Town Municipal Planning By-law (2015).

The application forms are attached as **Annexure 7: Land Use Application Forms**.

2.0 CONSIDERATIONS FOR AN APPROPRIATE ENVELOPE

Erf 9702 Brackenfell South is zoned Local Business 2, which permits dwelling houses and flats as primary rights. New buildings on this site could:

- Cover 75% of the site : 8 502,75m²
- Be placed on the street edge : zero setback
- Be placed on the common boundary : zero setback
- Rise up to 12m : zero height setbacks

In short, new buildings could be placed on the Affodil Street edge, rising straight up to the 12,0m height level without any setbacks. The same applies to the common boundaries with Erven 11135, 11136 and 22355 Brackenfell South.

This section considers development conditions in the local area to better manage how new buildings relate to neighbouring properties, the street, and the local area.

2.1 Street Setbacks

The distances that buildings are setback from the street affects the experience of that place.

Generally, the buildings to the east of Affodil Street are setback by approximately 5,0m from the street, but there are instances where garages have been built on the street. Properties to the west are setback by 4,2m line (refer to **Figure 2.1: Street Setbacks**).

The diagram shows the varying spaces (shaded in red) between the street and buildings. In some places, buildings have been brought close to the street, while other others feature deeper front gardens.

Figure 2.1: Building street setbacks

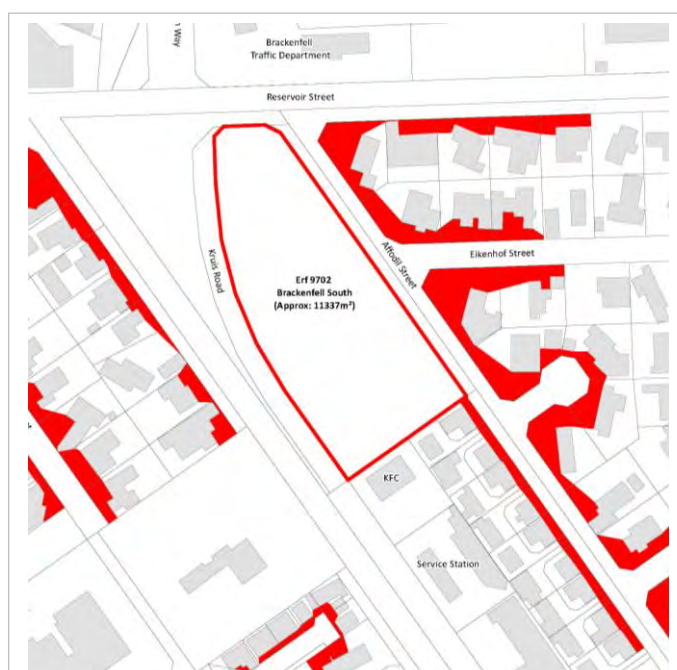


Photo 1: Typical house setback to the east of Affodil Street



Photo 2: Typical house setback to the west of Affodil Street

2.2 Frequency of Street Accesses

Properties to the east of Affodil Street have accesses approximately 15m-36m apart.

Properties to the west of Affodil Street have significantly more frequent driveway access that serve panhandled sites, and street facing sites.

The frequency of access points, illustrated in **Figure 2.2: Access Points**, provides some insight into the rhythm of access points on either side of the Affodil Street.



Figure 2.2: Access Points

2.3 Building Heights

The site's current LB2 zoning permits a building height of up to 12,0m above the existing ground level as of right. This is slightly higher than the maximum permitted for R1 (10,0m) but less than for GB1 (15,5m). There are two elements to consider when thinking about building heights:

- Existing building heights show the current situation; while
- Permissible heights show the maximum height allowed as of right.

Permissible heights acknowledges that existing heights can be increased simply by the submission of a building plan, and without public engagement. Permissible heights is therefore an appropriate indicator for local area heights.

Figure 2.3: Section AA (current) shows that the residential building on Erf 1871 to the east of Affodil Street currently rise to approximately 4,7m. (NOTE: existing building heights are sourced from the City's LIDAR data contained on the City Map Viewer.)

Section AA also shows that buildings on Erf 1871 can be developed to a height of 10,0m under its current R1 zoning.

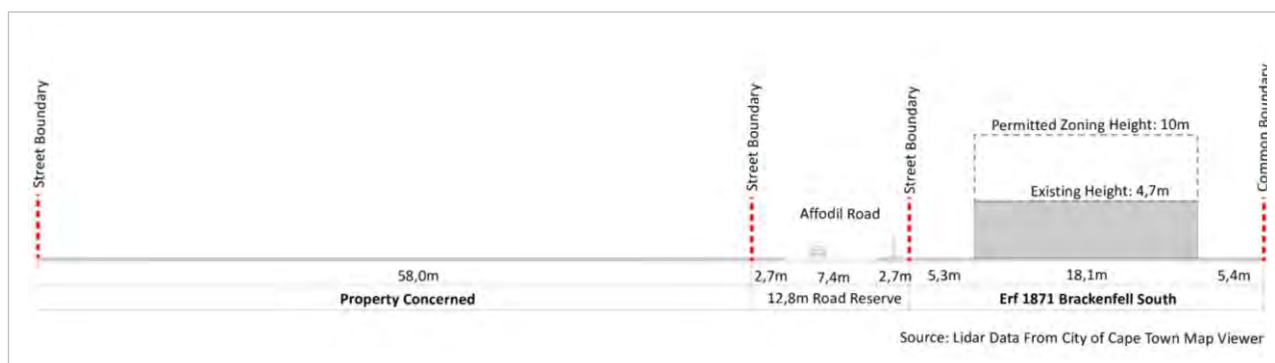


Figure 2.3: Section AA (current)

Figure 2.4: Section BB (West) shows that the tallest building to the south of Erf 9702 currently rises to 4,3m (forecourt roof on the GB1 zoned Erf 7831), but could be developed to a height of 12,5m. The maximum heights for R1 sites on Erven 11144 and 11143 are 10,0m.

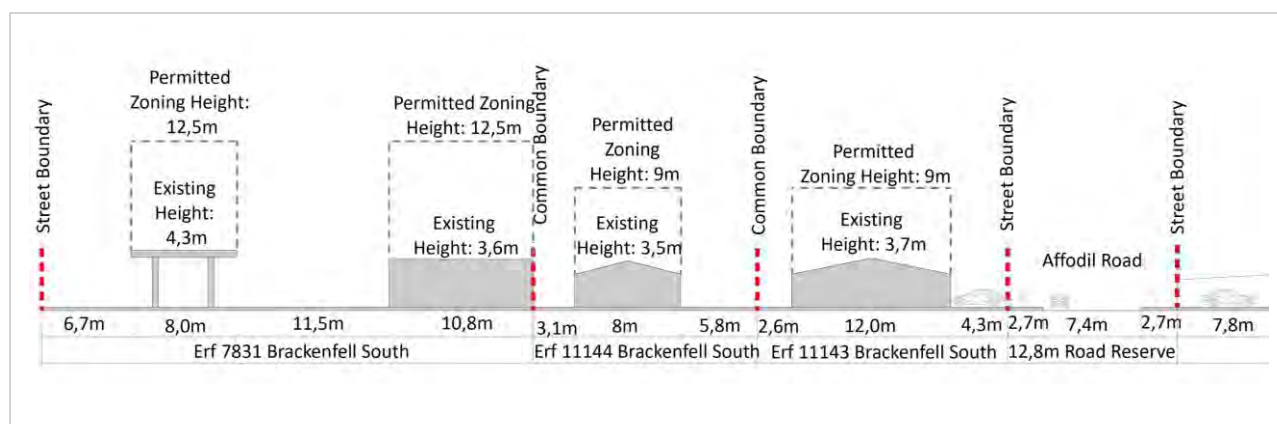


Figure 2.4: Section BB (West)

R1 zoned sites to the east of Affodil Street can be developed to a maximum of 10,0m.

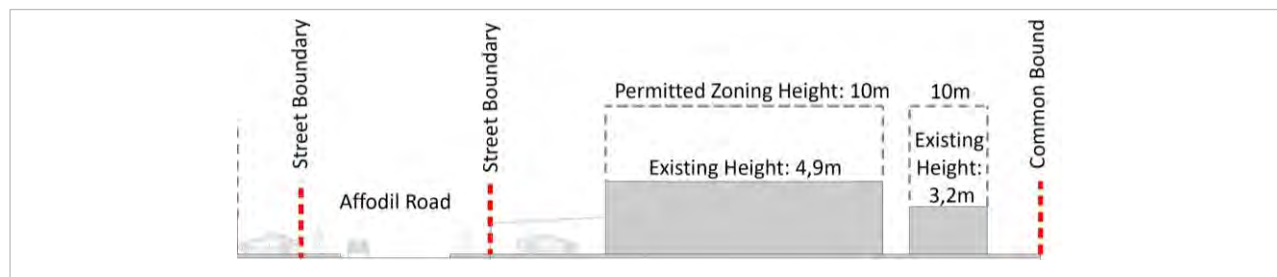


Figure 2.5: Section BB (East)

2.4 Design Informants / Indicators

- Setback new buildings to similar distances from Affodil Street as other residential buildings.
 - Buildings to the west of Affodil Street are setback by approximately 4,2m from the street boundary.
 - Main buildings to the east of Affodil Street are located on larger residential erven, where wider setbacks of approximately 5,0 to 12,0m occur. Garages have been built on the street boundary (zero setback).
- The frequency of new driveways should mimic those of houses to the west of Affodil Street in order to retain the rhythm of access from the road.
- Buildings on R1 site to the east of Affodil Street can rise to 10,0m as of right, while GB1 zoned sites can rise to 12,5m. The LB2 height of 12,0m appears to be contextually appropriate.
 - New buildings could be stepped up in height from Affodil Street to create a more comfortable interface with Affodil Street and the R1 uses to the east.
 - New buildings could be stepped up in height from the common boundaries with R1 sites to manage the interface with dwelling houses on Erven 11135 and 11136.
- Landscape interventions on the edges of the site could assist to manage the interfaces along these edges.

Figure 2.6: Design Informants summarises the important design informants.

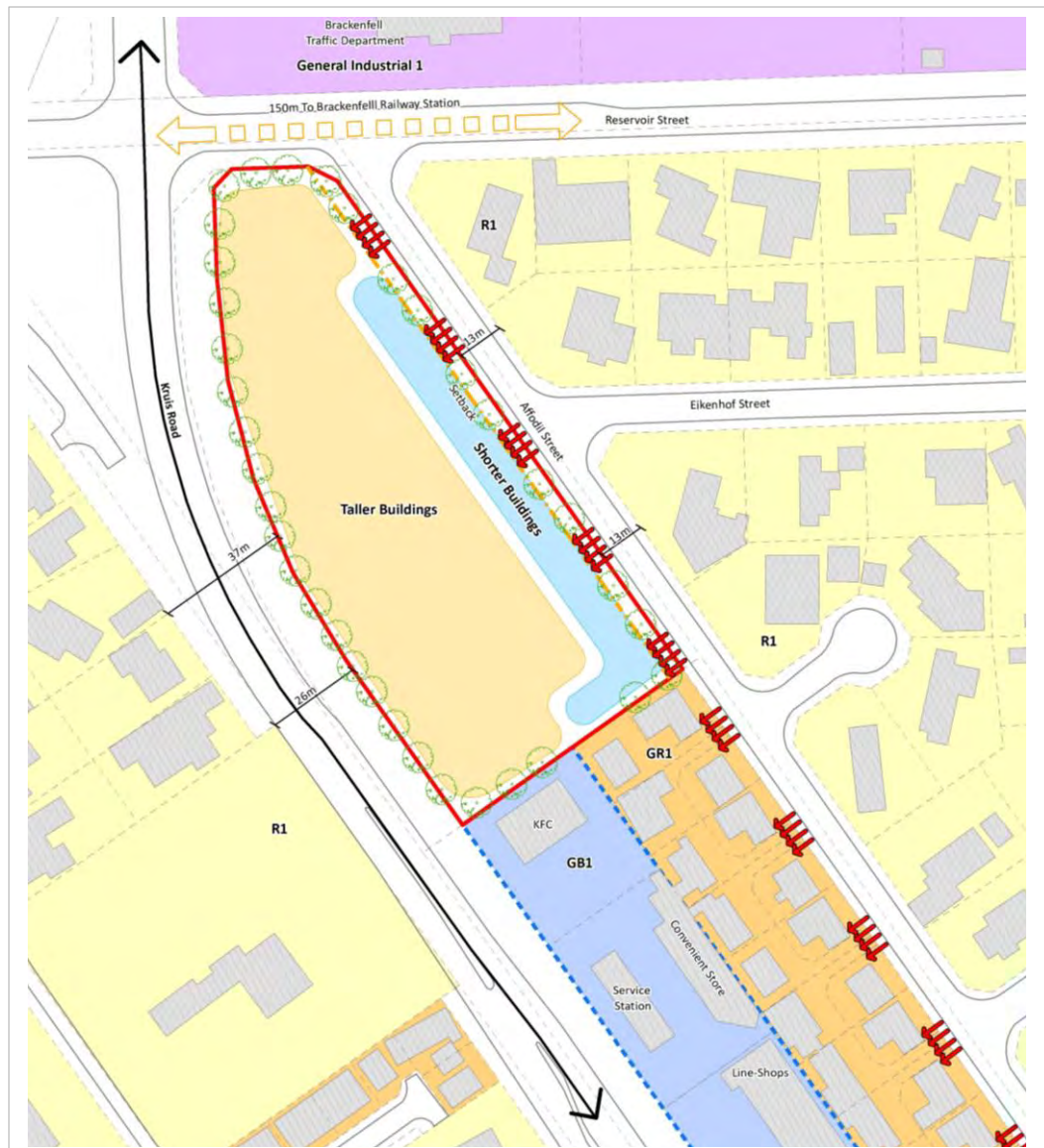


Figure 2.6: Design Informants

3.0 DEVELOPMENT PROPOSALS

Section 3 will provide details of the development proposals for Erf 9702 Brackenfell South.

3.1 Development Objectives and Building Proposals

It is proposed to develop the site with a mix of market and affordable housing units in the form of multi-level accommodation. **Figure 3.1: Building Locations** shows where the market related houses and affordable rental units will be located.

The key elements of the development are:

- Number of opportunities:
 - o GAPP market housing (Semi-detached Double-Storey): 31 units with a typical dwelling unit size of 27m².
 - o Affordable rental units (2-bedroom apartments): 115 units with a typical unit size of 40m².
- 2-Storey market-related housing (5,95m height) is located along the majority of frontage onto Affodil Street.
- 2-Storey market-related housing (5,95m height) is located adjacent to Erven 11135 and 11136 to create a more comfortable interface.
- 3-Storey buildings (9,67m height), which accommodate affordable rental units, are located in the middle of the site.
- Taller 4-storey buildings (12,34m height) with affordable rental units, are located adjacent to Kruis Road.
- New 2-storey buildings (5,95m height) along Affodil Street will be setback from the street by 4,5m. This re-creates the street setbacks that occur on properties further along Affodil Street to the south.
- New 2-storey buildings (5,95m height) adjacent to Erven 11135 and 11136 will be setback by 4,5m to better manage the interface between the sites, rather than apply the LB2 zoning's zero metre setback.
- 127 Parking bays will be provided on-site. A guardhouse (approximately 14m²) will be provided at the entrance gate.
- Stormwater facility to be created in the northern extent of the site adjacent to the intersection of Reservoir Street and Kruis Road.



Figure 3.1: Building Locations (Source: JSA Associates)

- Three recreation spaces within the development (refer to **Figure 3.2: Recreational Spaces**):
 - o One is located within the courtyard between the 4 and 3-storey buildings, measuring approximately 480m², and is intended for residents of the development.
 - o A second in the southern corner of the site adjacent the KFC fast food outlet, measuring approximately 780m². This recreation area will also be under controlled access to the general public for passive recreation purposes, including a potential dog park. Access control will be detailed in a future site development plan that is to precede building plan approval.
 - o A third includes the landscaped edges and stormwater pond area, which offers passive recreation opportunities.



Figure 3.2: Recreational Spaces (Source: JSA Associates)

The building proposals used to develop a feasible development scenario is attached as **Annexure 9: Architectural Proposals**, and extracts are shown in the images below.



Figure 3.3: Oblique view from the north-west, showing taller structures adjacent to Kruis Road and the stormwater pond (Source: JSA Associates)



Figure 3.4: Oblique view from the south, showing how the development steps up in height from Affodil Street to Kruis Road (Source: JSA Associates)



Figure 3.5: Site Layout (Source: JSA Associates)

3.2 Elevations



Figure 3.6: West elevation showing the affordable housing buildings from Kruis Road (Source: JSA Associates)



Figure 3.7: East elevation showing the market rental units along Affodil Street (Source: JSA Associates)



Figure 3.8: North elevation showing the affordable rental units facing the proposed stormwater pond (Source: JSA Associates)

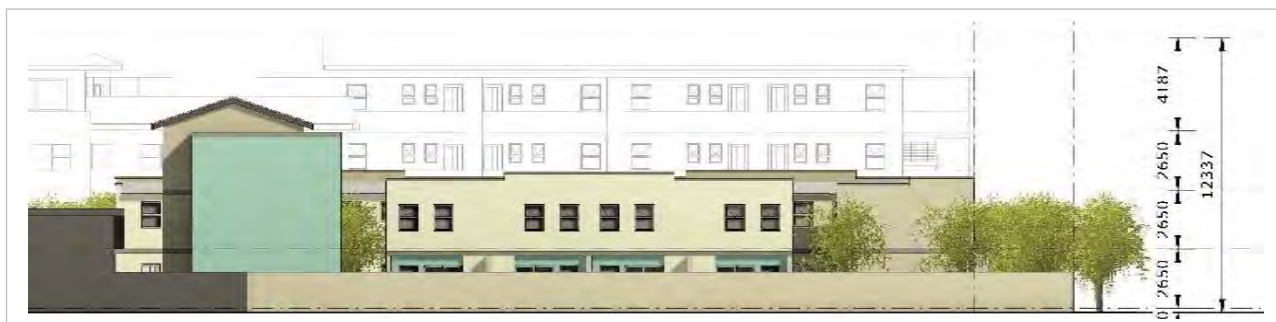


Figure 3.9: South elevation looking at the proposed 2-storey buildings from Erven 11135 and 11136 (Source: JSA Associates)

3.3 Vehicular and Pedestrian Movement

Figure 3.10: Access, Parking and Circulation Plan shows the following:

- Vehicular access and exit will be from Affodil Street. The Carriageway Crossing (CWC) will be 6,0m wide with a 7,3m stacking distance.

Figure 3.11 is a zoom in of the main entrance, showing widths and stacking distance. Figure 3.12 shows the main entrance when viewed from Affodil Street.

- A total of 127 parking bays is proposed for this development. Access to the centralised parking area will be controlled with a guardhouse (approximately 14m²) located adjacent to the entrance.
- A two-way internal circulation with a 6,0m and 8,0m wide internal circulation path.
- The 2-storey buildings to the north of the main entrance, have dedicated driveways, directly from Affodil Street.



Figure 3.10: Access, Parking and Circulation



Figure 3.11: Main Vehicular Entrance and Exit Gate (Source: JSA Associates)



Figure 3.12: Elevation of the Main Vehicular Entrance and Exit Gate (Source: JSA Associates)

3.4 Landscaping Proposals

Landscaping interventions focus on:

- Trees is proposed to be planted along the street edges.
- Hard and soft landscaping for the internal courtyards and circulation spaces.

The landscape proposals are attached as **Annexure 8: Architectural Proposals** .

Figures 3.13-3.14 below shows the Affodil Street edge treatment of the Market Rental Units with and without Driveways.



Figure 3.13: Edge Treatment along Affodil Street of Market Rental Units With Driveways (Source: JSA Associates)



Figure 3.14: Edge Treatment along Affodil Street of Market Rental Units Without Driveways (Source: JSA Associates)

4.0 DEVELOPMENT APPLICATIONS

Erf 9702 Brackenfell South is zoned Local Business 2. The current zoning, which allows dwelling houses, flats, and utility service as of right, means that it is not necessary to rezone the property.

Although the appropriate zoning exists and efforts were made to improve the interfaces between new buildings and neighbours by setting back from the edges, it is necessary to make the following land development applications:

- An application to depart from the height requirement.
- An application to depart from the parking requirement.
- An application to allow the carriageway crossing of the emergency exit gate to be closer than 12m from proposed market-related housing CWC.

4.1 Departure: Height

An application to depart is made in respect of item 56(c) (i) of the DMS to permit the height of the new 4-storey buildings 12,34m in lieu of 12,0m. The height departures are only applicable to the taller buildings adjacent to Kruis Road.

The departure is for an additional height of 0,34m (a ruler's length) above the maximum 12,0m height. This additional height is not significant and is appropriate / not out of place given the maximum height limits adjacent zonings.

The departure application is made in terms of item 42(b) of the City of Cape Town Municipal Planning By-law (2015).

4.2 Departure: Parking Bays

The DMS requires the following on-site parking:

Land Use	Rate	Required Bays	Provision	Comment
Affordable housing (31 dwelling houses)	1 bay/unit	31 bays	31 bays	No Departure required.
Affordable Rental (115 dwelling units)	1 bay/unit	115 bays	96 bays	Departure required to accommodate the shortfall of 19 bays.
Total		146 bays	127 bays	

A parking departure is required for 'Affordable Rental' units. The departure application is made in respect of item 137 of the DMS to permit 127 bays in lieu of 146 parking bays for the affordable rental unit. This application is made in terms of Section 42(b) of the By-Law.

The parking departure should be supported because:

- A TIA was undertaken in August 2024, reported on an after-hours parking survey conducted at other similar affordable rental development, to determine a parking rate that would be more appropriate to people who reside in affordable rental units. The after-hours parking surveys were

conducted at Drommedaris development in Brooklyn and Bothasig Garden in Bothasig. The surveys were done between 18:00 – 20:00 (refer to **Annexure 13: Traffic Impact Assessment & Review**).

- The TIA found that a parking rate of 0,45 parking bays/units is appropriate rate for affordable units.
- Based on the TIA findings of actual parking use and after-hours occupancy, the more appropriate parking rate suggests that 146 affordable units (115 affordable rental + 31 GAPP market housing) require 66 parking bays (0,45 bays x 146 units = 65,7 bays) instead of the 146 bays required in terms of the DMS.

The TIA calculated a parking rate based on after-hours occupancy in established affordable rental developments. The TIA therefore supports the reduced parking provision.

The departure application is made in terms of item 42(b) of the City of Cape Town Municipal Planning By-law (2015).

Please note that the August 2024 TIA was re-evaluated in June 2026 (**Annexure 14: Traffic Impact Assessment Review**) in order to determine whether the assumptions, methodology and conclusions remained appropriate and valid in 2026. The TIA June 2026 review confirmed that the 2024 TIA remains valid and consistent with current industry practice and continue to provide a sound basis for assessment.

4.3 Departure: Carriageway-Crossing

An application is made to depart in respect of item 140(2) (b) of the DMS to allow more than 2 carriageway crossings to Erf 9702 Brackenfell South:

- CWC 2 to be 9,5m away from CWC 3 in lieu of 12m.
- CWC 3 to be 9,4m away from CWC 4 in lieu of 12m.
- CWC 4 to be 2,5m away from CWC 5 in lieu of 12m.

The development proposals show 9 CWCs:

- A main access gate (6,0m wide) on Affodil Street that serves the affordable rental unit development;
- An emergency exit on Affodil Street close to Reservoir Street; and
- Three shared CWCs allowing direct access for parking at the 2-storey market related housing.

The departure is motivated on the basis that:

- Affodil Street is Class 5 road, without access spacing requirements;
- Multiple accesses existing to the south along Affodil Street, without causing unsafe conditions.
- The form of development (i.e. attached 2-storey dwelling houses) would not require special permission if these units were subdivided into separate cadastral entities.
- The August 2024 TIA review confirmed that the multiple accesses along Affodil Street (Class 5) is not prohibited and does not deviate from the existing functionality of the road, nor does it breach any guidelines.

The departure application is made in terms of item 42(b) of the City of Cape Town Municipal Planning By-law (2015).

The application forms are attached as **Annexure 8: Land Use Application Forms**.

5.0 MOTIVATION IN SUPPORT OF THE DEVELOPMENT PROPOSALS

The current LB2 zoning permits all the proposed uses (dwelling houses, flats, and utility services) 'as of right'. The applications made in this report are therefore limited to:

- A height departure to allow certain new buildings to rise to 0,34m (34 cm) above the LB2 maximum height;
- A parking departure to allow 127 bays in lieu of 146; and
- A departure to allow more than two carriageway crossings to an erf.

We set out the motivation that supports the development applications and proposals in the following sections. We base our motivation on Section 99 of the MPBL.

5.1 Section 99(1): Applicable Spatial Development Frameworks and Policies

➤ Cape Town Spatial Development Framework (CTSDf, 2023):

The SDF was approved on the 26th of January 2023. Together with the Provincial Spatial Development (PSDF), these two policies have the highest legal status in respect of the spatial planning for the Cape Town Area.

Cape Town's Municipal Spatial Development Framework (MSDF) sets out the spatial vision and development priorities to achieve a reconfigured, inclusive spatial form for Cape Town. The document is a spatial interpretation of the City of Cape Town's Integrated Development Plan and flows from the five-year review of the previous MSDF.

The site is located within the area designated as 'Incremental Growth and Consolidation Area (IGA)' (refer to **Figure 5.1: Spatial Transformation Areas**).

New more intensive development is promoted in areas with the IGA designation, where the desired spatial outcome is:

- Diverse and dense land uses, subject to engineering infrastructure and capacities.
- Diversification of mono-use residential patterns.
- Public sector investment in existing and future human settlements.
- Implementation of public and private land developments in support of spatial transformation.
- Consolidation and diversification in support of city growth.

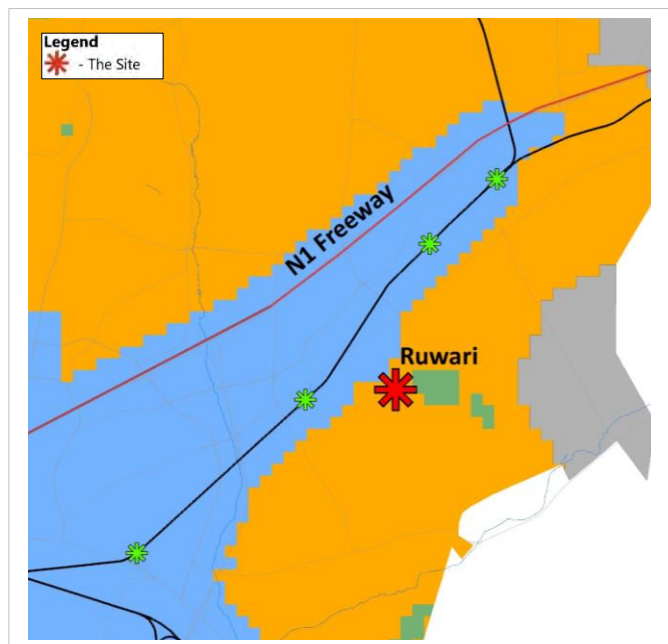


Figure 5.1: Spatial Transformation Areas

The CTSDf encourages and supports intensification provided there is adequate availability of municipal utility services.

The proposal aligns with the following sub-strategies of the Spatial Strategies 1 to 3.

Spatial Strategy 1: Plan for inclusive economic growth and improve access to economic opportunities, which acknowledges the link between achieving the spatial development goals and sustainable employment generation economic growth and reducing the accessibility for the poor.

Spatial Strategy 2: Manage urban growth, create a balance between urban development, food security, and environmental protection, in order to achieve urban resilience. The City supports an urban form with higher densities and mixed-use land patterns supported by public transport. This urban form is anticipated to result in the more sustainable use of land and resources, lower carbon emissions, more efficient use of infrastructure, more efficient public transport systems, and social amenities.

Spatial Strategy 3: Build an inclusive, integrated, vibrant, and healthy city, by addressing economic and social exclusion stemming from the apartheid era. The desired end result is a better mix of income groups, land uses, population densities and the equitable and adequate provision of services and facilities.

Alignment with the MSDF:

The site is located within an area designated as 'IGA,' where new development and densification is promoted, but subject to adequate provision of civil engineering infrastructure and capacity to the proposed development. Firstly, the development applications are NOT seeking additional right but is acting within the current zoning. Secondly, as part of taking a responsible approach to development, the issue of capacities was considered during the design development stage. The City's Water & Sanitation Directorate (Technical Services) have confirmed (refer to **Annexure 10: Water & Sanitation Capacity Letter**) that the proposed development can be accommodated by:

- The water reticulation network, which has sufficient capacity for the proposed development;
- The bulk water supply, which has sufficient water resources, treatment, bulk storage, and conveyance capacity to supply the proposed development;
- the sewer reticulation network, which can accommodate the proposed development prior to upgrades at the Rietvlei Sewer Pumpstation; and
- the Bellville Wastewater Treatment Works, which has sufficient unallocated spare capacity.

Furthermore, the proposed development supports the CTSDf because it will:

- result in a more compact urban form, which better utilised existing vacant and zoned land.
- result in a liveable urban environment that is serviced and offers benefits back to the local area in the form of controlled access to an internal recreation area.
- It will result in affordable accommodation to qualifying families from the local area and wider Cape Town.
- Optimise the use of vacant zoned land.
- Allow a wider range of income groups to reside in the local area and thereby create a better mix of income groups.

Furthermore, the site is located adjacent to existing public transport route (taxi) and 144m from Brackenfell Rail Station and Brackenfell Public Transport Interchange, an ideal location for residential accommodation. This responds directly to the City's vision of being a 'City of Hope.'

➤ Northern District Plan, and Environmental Management Framework, Technical Report (2023):

The Northern District Plan is a district spatial development framework in terms of Chapter 3 of the City of Cape Town Municipal Planning By-Law (2015). It is a council policy plan, intended to provide greater detail to allow better management of the sub-area within the metropolitan area.

The site falls within the Fisantekraal, Joostenbergvlakte, Bloekompos and Scottsdene area (refer for **Figure 5.2: Northern District Plan**), and is designated as 'Potential High Density Residential Development.'

'Potential High Density Residential Development' is defined as new development with an average gross density >75du/ha.



Figure 5.2: Northern District Plan

Alignment with the District Plan:

In response to these spatial development objectives, the development of the site:

- Includes different housing typologies for 2 different markets (affordable housing and market rental).
- Creation of an access control recreation space for residents and the general public.
- Represents an intensification of vacant zoned land with the development of multi-storey accommodation units that support public transport. The site is located adjacent to a public transport route and approximately 1,5km from both Brackenfell Rail Station and Brackenfell Public Transport Interchange.
- Proposes residential development on vacant public land at a density of approximately 128du/ha.
- Proposes to place the taller buildings (3-4 storeys) along Reservoir and Kruis Road. These buildings will overlook the stormwater pond and public transport route.
- Proposes to place the 2- storey buildings along Affodil Street in order to better manage the interface with R1 erven.

➤ Human Settlement Strategy (May 2021)

The Human Settlements Strategy estimates that it is necessary to develop approximately 50 000 housing opportunities every year for the next 8-10 years to address the housing backlog. In 2018, the estimate to address the housing backlog was put at approximately 35 000 formal housing accommodation opportunities that was required annually over the next 20 years in order to address the backlog and new demand. The land required to accommodate these accommodation units are limited and are constrained by factors such as ownership, environmental factors (flood prone areas), the effect of infrastructural installations (powerlines) and the opposition by existing communities.

Alignment with the Human Settlement Plan:

The development proposals for Erf 9702 Brackenfell are made in an effort to assist in addressing the accommodation backlog that exists in a manner that is considerate of the receiving local environment.

➤ **Densification Policy (December 2012)**

City of Cape Town Densification Policy (2012): Rapid and continuous low-density development and the possibility of uninhibited urban sprawl is threatening the long-term sustainability of Cape Town. Densification is therefore viewed as a necessary step to promote the longer-term sustainability of Cape Town's valuable natural, urban, and rural environments.

The City recognises the need to use urban land in a manner that improves the long-term sustainability of Cape Town. By adopting the Densification Policy, the City has committed to a tool that:

- Reduces the consumption of land, a non-renewable resource;
- Supports the development of a viable public transport system;
- Makes the City more equitable, by allowing more people housing opportunities close to opportunities;
- Facilitates economic opportunities and support service provision;
- Improves housing patterns and increases the choice of accommodation types; and
- Contributes to urban place-making and improves safety.

The proposed development is consistent with the Densification policy objectives for the following reasons:

- The proposal ensures the optimal and efficient use of infrastructure, services, facilities, and land.
- It provides opportunities and integrated living environments.
- The development will add to the mix of residential densities and housing typologies in the area which will ensure diversification and more options to a larger number of people.
- The development will enable state owned land within the urban fabric to be developed in a way that facilitates spatial integration and intensification of land uses.
- The development will be located adjacent to a public transport route.
- The development will be close to employment opportunities.

➤ **City of Cape Town Urban Design Policy (2024):**

The urban design policy is primarily concerned with the process of design, and how development impacts on the public domain and how it responds to the sites and context.

Not all urban design principles apply in all situations and identify the following as key considerations:

- Locational suitability: is this is the right place for a development of this nature?
- Interface suitability: does the proposals offer appropriate interfaces with adjacent uses and users?
- Internal logic & place making do the proposals lead to an urban space that is comfortable, safe, and functionally sound.

The Urban Design Policy, 2024 contains nine objectives to guide the formulation of development proposals. The following objectives are particularly relevant:

- *Objective 1 – Ensure legible structure:*
The proposal is for higher-density residential development comprising 2- to 4-storey buildings on a site that is designated for 'high density residential development'. The proposed development responds and contributes positively to its surrounding context and the built form of the neighbourhood. It supports the objectives of the relevant spatial development frameworks, including the urban form encouraged by these frameworks.

- *Objective 3 - Contribute to the creation of healthy and safe communities:*
The development improves surveillance of the surrounding streets by having windows facing the streets and proposed open spaces. This will increase the level of safety, reduce occurrences of vandalism, and discourage criminal and violent activities.
- *Objective 5 - Promote development intensity, diversity, and adaptability:*
The proposal will result in more intense development and will contribute towards a more diverse range of residential accommodation.
- *Objective 6 - Ensure positive interfaces onto the public realm:*
The proposed placement of buildings will have a positive interface with adjacent public roads and open spaces (refer to **Figures 5.3 – 5.6**).



Figure 5.3: Street Interface Along Affodil Street (Source: JSA Associates)



Figure 5.4: Street Interface Further Along Affodil Street (Source: JSA Associates)



Figure 5.5: Street Interface Along Kruis Road (Source: JSA Associates)



Figure 5.6: Internal recreation space for residents (Source: JSA Associates)

- Objective 9 - Respond to the character and identity of an area:*

The proposal is for a medium to high density residential development which is compatible with the current residential character of the neighbourhood. The 3-4 storey buildings situated along Kruis Road will be setback 39,3m from the neighbouring properties. Given that Kruis Road is a main through route, these buildings will not have any negative impact on the surrounding neighbouring properties. Along the eastern and southern boundary of the site, which is closer to the single residential units, the proposal is to develop two storey buildings. The proposed built form is therefore considered contextually appropriate.

➤ **Economic Growth Strategy (EGS):**

The principal objective of this strategy is to grow the economy and the creation of employment opportunities. The primary focus is that the proposed development is for residential purposes but will create employment

opportunities during the planning and construction phase, as well as employment opportunities for maintenance.

The proposed development is furthermore located in close proximity (within 500m) close to employment opportunities, which allows for short travel distances for residents.

➤ **Social Development Strategy (SDS):**

This policy is structured on five objectives:

- Maximise income generating opportunities for people who are excluded or at risk of exclusion.
- Build and promote safe households and communities.
- Support the most vulnerable enhancing access to infrastructure and services.
- Promotes and foster social integration.
- Mobilise resources for social development.

The proposed development supports these objectives by:

- Creating income generating opportunities during planning and construction phase, as well as a long-term opportunity such as maintenance.
- Creating accommodation opportunities in an established urban area where services and facilities already.
- Contributes towards increasing the provision of favourably located residential accommodation with good access to social facilities and public transportation and in close proximity to employment opportunities.

5.2 Section 99(1): Effect of the Departure Application

The proposed height departure to allow certain new buildings to be 12,34m instead of 12,0m does not give the property the benefit of the next subzone within the zone. There are no additional subzones after LB2 in the Local Business zone.

The impact of the additional 34cm of height is likely to have an insignificant impact on adjacent properties, especially since these taller buildings are located adjacent to Reservoir and Kruis Roads, and away from R1-zoned properties.

5.3 Section 99(2): Impact on Existing Rights

The issue of existing rights is often mis-understood in planning applications.

Chapter 3 of the Constitution of South Africa establishes certain fundamental rights, which cannot be eroded by administrative actions. The question before a decision-maker in respect of a land use application is whether the approval of the land use application will arbitrarily erode or limit fundamental rights.

Rights which are often cited in land use applications are:

- Privacy: neighbours often take the position that development proposals will result in a loss of privacy in front or back gardens. However, neighbouring property owners can only expect complete personal privacy in the confines of their homes because the DMS limits the heights of boundary walls whilst also allowing multi-storey structures.

- Administrative justice: the planning and development rights process is designed to include mechanisms to consider the contributions of development proponents and objecting parties. The process results in a decision, which includes reasons for the decision. Thereafter, the process allows decisions to be challenge via an appeal process, or to be reviewed via a court process.
- Property: the approval of the application will not lead to neighbouring property owners losing their rights to use, enjoy and dispose of their properties.
- Environment: the proposed development will not create real health risks and is likely to assist the City onto a more sustainable development trajectory.

The proposals for the site:

- Does not erode privacy within confines of neighbouring homes;
- Does not erode the ability of all parties to participate in the decision-making process;
- Does not erode the ability of local property owners to use, enjoy, and dispose of their properties.

There is often the suggestion that local residents have a legitimate expectation that the character of the neighbourhood will not change. This is only a valid argument if the overarching planning framework supports the preservation of an area (by for example minimum erf sizes). In the case of Erf 9702 Brackenfell the District Plan is explicit about:

- Redeveloping vacant and under-utilised public land for accommodation purposes, and
- Encouraging developments that support public transport infrastructure (i.e. increase densities and diversity of use in support of public transport investment).

Lastly, the proposals for Erf 9702 Brackenfell do not interfere with the City's ability to provide services to adjacent properties i.e. the proposals can be accommodated within the existing municipal services network refer to **Annexures 10: Water & Sanitation Capacity Letter** and **Annexure 13: Traffic Impact Assessment** and).

5.4 Section 99(2): Legal Considerations (national and provincial)

➤ Spatial Planning and Land Use Management Act (16 of 2013)

The Development Principles in Chapter 2 of the Spatial Planning and Land Use Management Act apply. These include:

	Do the applications promote these principles?
Spatial Justice	SPLUMA acknowledges the need to address the continued effects of past spatial and regulatory imbalances, which continues today in the form of the provision of affordable units in often remote locations. (Remote in terms of distance to and difficulty of accessing opportunities.) It is for this reason that SPLUMA insists that land in well-located and well-resourced areas must be made available for development, especially for disadvantaged communities. SPLUMA anticipated that the counter argument to this type of development would focus on the potential impact on property values and specifically warns that decisions cannot be solely influenced by this argument. The development proposals for a mix of affordable rental units and market related units directly supports the principle of spatial justice because it uses well-located vacant to create accommodation at affordable rentals.

Spatial Sustainability	SPLUMA is concerned with how we manage urban growth. The proposed development is located within the well-resourced urban context. The development of the site in a more efficient manner assists in limiting urban sprawl and creates a space in the local community for a range of income groups to co-exist.
Spatial Efficiency	The development proposals considered the availability of the existing engineering services and the ability of the network to accommodate new development. Using existing infrastructure to serve more people represent an opportunity to improve the efficiency of the system. The same applies to the use of vacant land.
Spatial Resilience	The development proposals introduce an urban form with higher densities and improve the range of typologies available to wider group of families. This urban form helps to place the City on a more sustainable development trajectory, ultimately assisting the City to become more resilient to environmental, social, and economic shocks.
Good Administration	The development process will consider the inputs of all parties affected by the development of the site, in the context of the broader city and the need for a more sustainable city growth.

The proposals for the site present an opportunity to locate a mix of affordable units and market related units in an area that offers easy access to transport opportunities, services, and employment. This will assist in efforts to redress the spatial imbalances of our City, where affordable housing tends to be located on the periphery of the city away from opportunities. The proposals are therefore generally consistent with the development principles of SPLUMA.

➤ **Land Use Planning Act (3 of 2014)**

The Land Use Planning Act sets out the principles for development as well as the minimum requirements for municipal planning matters as well as the minimum content for metropolitan spatial development frameworks and zoning schemes at the provincial level. The minimum requirements, set out in Section 2 apply, include:

- Municipalities are responsible for land use planning in their respective municipal areas and within their jurisdiction.
- A municipality must regulate at least the following:
 - o the development, adoption, amendment, and review of a zoning scheme for the municipal area;
 - o the procedures in terms of which the municipality receives, considers, and decides on land use applications;
 - o the procedures in terms of which the municipality facilitates public participation in its consideration of land use applications;
 - o the criteria for deciding on land use applications;
 - o the imposition of conditions of approval for land use applications;
 - o the procedures applicable after a land use application has been approved; and
 - o the enforcement by the municipality of its by-laws and decisions about land use planning.
- A municipality must perform the functions referred to in this section in accordance with this Act.

The application process has followed the procedure as required by LUPA.

➤ **National Environmental Management Act, 1989 (Act 107 of 1998)**

The development proposals to exercise existing rights do not trigger the requirements for an environmental assessment in terms of NEMA.

➤ **National Heritage Resources Act, 1999 (Act 25 of 1999)**

The legislation “aims to promote good management of the national estate, and the enable and encourage communities to nurture and conserve the legacy.” Section 38 lists a host of development categories, which if pursued, requires that the responsible heritage resources authority, Heritage Western Cape (HWC), be notified.

The proposal for the site triggered certain parts of Section 38 of NHRA and a NID was submitted by City of Cape Town: Human Settlements Department to HWC. Heritage Western Cape confirmed that the proposed development will not impact on heritage resource and that no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required, refer to **Annexure 11: NID Outcome**.

5.5 Section 99(3): Desirability Criteria : Socio-Economic Impact

The proposals are desirable because:

- The proposed development will provide a higher density type of accommodation that will enhance the potential economic opportunities within this specific area.
- The development will assist to address the housing and accommodation needs of a range of income groups on vacant, underutilised and appropriately zoned land in an established area.
- The proposal will generate employment opportunities during the construction phase, supporting local economic activity.
- The development is located near industrial, commercial, recreational, residential and transport routes, enhancing access to employment, amenities, and metropolitan services such as hospitals and schools.
- The project promotes efficient use of existing land and contributes positively to the overall socio-economic development of the area.

5.6 Section 99(3): Desirability Criteria : Compatibility with Surrounding Uses

➤ **Existing On-site and Surrounding Uses**

Figure 5.7: Aerial Photo (2025) shows the site and developments on the surrounding erven:

- Erf 9702 is vacant.
- The properties to the north of the site includes a mix of facilities and services, as well as industrial uses.
- Single dwelling houses are located to the east and to the south along Affodil Street, as well as to the west of Kruis Road.
- Industrial-type uses are located to the north of Reservoir Street.
- There are a mix of uses along Kruis Road, including a food outlet (KFC), petrol station (Engen), and retail shops.



Key

- Site Boundary:Erf 9702 Brackenfell South (Approx:11337m²)
- Surrounding Properties
- Street Centrelines
-
-
-
-

Erf 9702 Brackenfell South		5.7
AERIAL PHOTO (2025)		
SCALE at A3 1:1 500		
JONO TRUST		
Job: 26.377	Mxd: Aerial Photo (2025)	Date: 05 May 2026





Photo 3: View along Reservoir Road looking south-west across the site.



Photo 4: View along Kruis Road looking north-west across the site.

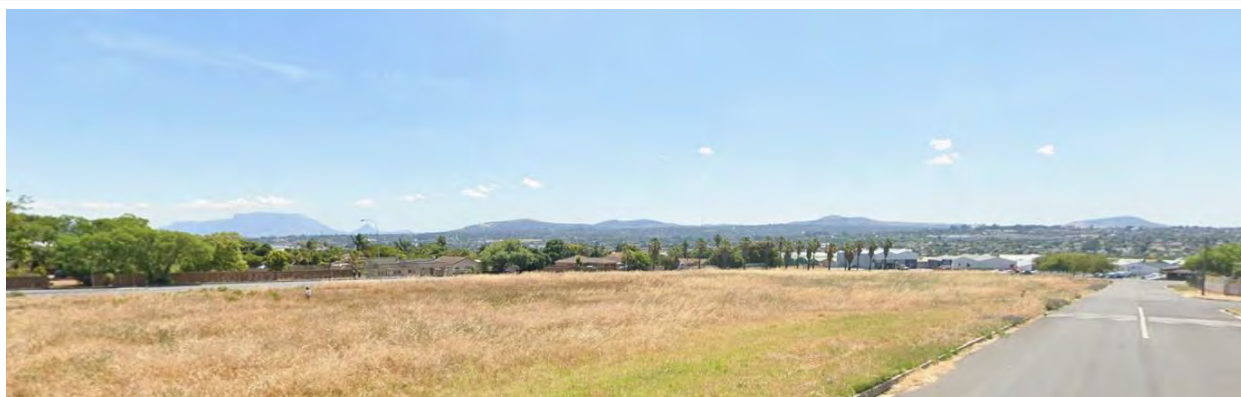


Photo 5: View along Affodil Street looking north-west across the site.



Photo 6: View looking north from Reservoir Street looking towards the Brackenfell Traffic Department.



Photo 7: View looking north-east from Reservoir Street towards the industrial area.



Photo 8: View looking east from Kruis Road looking toward the houses facing Kruispad Service Road.



Photo 9: View along Kruis Road looking towards the food outlet (KFC) and petrol station (Engen).



Photo 10: View further along Kruis Road looking towards the retail shops.



Photo 11: View along Affodil Street looking toward Erf 1871.



Photo 12: View looking east down Eikenhof Street



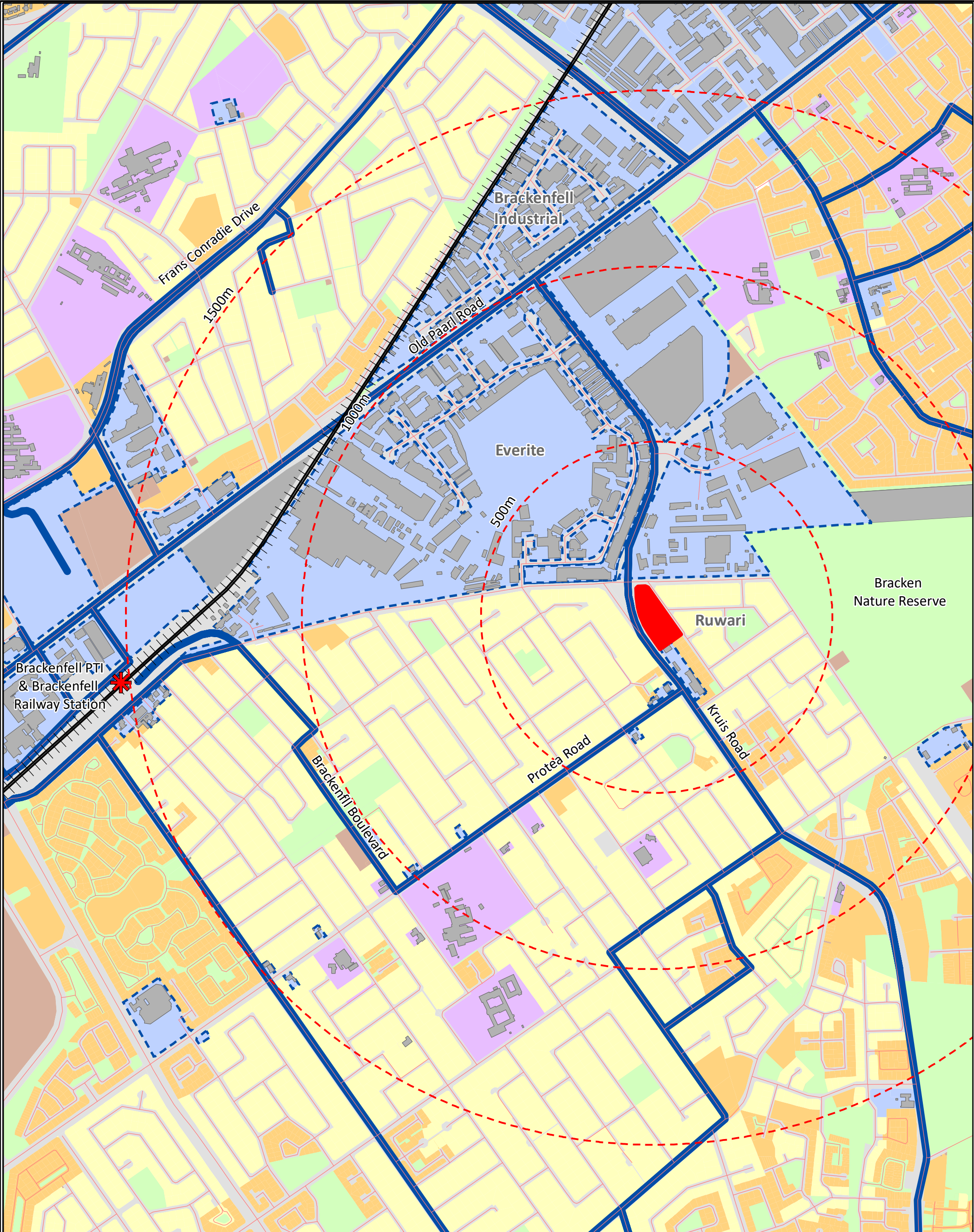
Photo 13: View of the common boundary with Erven 11135 & 11136 Brackenfell South

The site is located on the edge of a residential area, adjacent to an important north-south road link (Kruis Road). This 'edge' location is also exposed to the industrial zonings to the north of Reservoir Street. The development proposal is considered compatible with the surrounding area. The design concept ensures that it will have a minimal negative impact on adjacent single residential properties.

➤ **Features of the Local Area**

Figure 5.8: Local Context shows a broader environment within which the site is located. Key feature of the local area include that demonstrate the suitability for accommodation include:

- There are a variety of uses within a 500m radius that includes:
 - Productive uses that generate economic activity along Kruis Road, Old Paarl Road Okavango Drive and Frans Conradie Drive. Everite, an industrial area is located within 500m of the site and Brackenfell Industrial is an industrial area located within 1500m of the site.
 - Various housing typologies on General Residential zoned properties;



Key

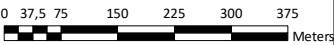
- | | | |
|--|---|--|
|  Site Boundary: Erf 9702 Brackenfell South (Approx: 11337m²) |  Radius Lines |  General Residential |
|  Street Centrelines |  Public Transport Interchange & Railway Stations |  Community Facilities |
|  Public Transport Routes |  Open Spaces |  Public Transport Zone 2 |
|  Railway Lines |  Residential |  Productive Uses/ Economic Activity |

Erf 9702 Brackenfell South

5.8

LOCAL CONTEXT

SCALE at A3
1:10 000



JONO TRUST



Job: 26.377 Mxd: Local Context Date: 14 May 2026

- o Various community facilities within 1km of the site.
- The proximity to public transport infrastructure:
 - o Brackenfell PTI and Brackenfell Rail Station are 1500m away;
 - o Kruis Road Mini-Bus Taxi Rank is located adjacent to the site; and
 - o Taxi and bus routes are located along Old Paarl Road (1000m away).

Figure 5.8: Local Context shows the extent to which the local area contains a mix of uses, a variety of different forms development, employment opportunities, and an extensive supply of social / recreational / educational services.

➤ Zoning Within the Local Area

Figure 5.9: Current Zoning shows property zonings of the site and surrounding erven.

Erf 9702 Brackenfell South is zoned LB2, which permits 'dwelling house' and 'flats' to be built to the following development parameters:

- Floor factor: 1,0 creating a maximum bulk of 11 337m²
- Coverage: 75% allowing 8 502,75m² of the site be covered by buildings
- Maximum height: 12m to top of roof, typically allows 4 storeys
- Street setback: 0m
- Common setback: 0m
- Street centreline setback: 8m

Properties to the north of Reservoir Road is zoned GI1, properties to the east are zoned R1, properties to the south are zoned GR1, GB1 and LB2 and properties to west are zoned R1. The GI1, GB1 and LB2 reflects the manufacturing / productive types of uses.

The LB2 zoning's street and common boundary setbacks allow new buildings to be developed on the boundaries up to a height of 12,0m. This may not be the most appropriate interface condition onto Affodil Street. Section 2 above, therefore suggested that certain setbacks could mitigate against any potential negative impact on adjacent properties. The application therefore makes the following proposals:

- Proposed Setbacks:
The proposed development could have built 0m on both the street and common boundaries. Instead, a development setback of 4,5m along the southern common boundary, eastern and northern street boundaries and 5,0m from the western street boundary is proposed (refer to **Figure 5.10: Proposed Building Setbacks**).
- Proposed Building Height:
The proposed building height (for affordable rental housing) is 12,339m above the EGL. The building rises 0,34m (34cm) more than what is permitted under the current LB2 zone. The height of this departure will not be perceivable from surrounding properties or roads (refer to **Figure 5.11: Section AA (Future)**).

The height of the proposed tallest buildings falls within the range of development parameters that exists in the area. The building heights proposed therefore will be consistent with the zoned established in the area. The building heights that will be created will also provide an opportunity for surveillance across public spaces.



Key

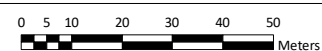
	Site Boundary:Erf 9702 Brackenfell South (Approx:11337m²)		GI1 - Max Height: 20m		R1 - Max Height: 10m
	Surrounding Properties		GB1 - Max Height: 12,5m		GR1 - Max Height: 9m
	Street Centrelines		LB1 - Max Height: 9m - 10m		UT - Max Height: Determined by SDP
	Open Space 2 (OS2) - Determined by SDP		LB2 - Max Height: 12,0m		TR2

Erf 9702 Brackenfell South

5.9

CURRENT ZONING

SCALE at A3
1:1 500



JONO TRUST



Job: 26.377

Mxd: Current Zoning

Date: 14 May 2026



Key

-  Site Boundary: Erf 9702 Brackenfell South (Approx: 11337m²)
-  Surrounding Properties
-  Street Centrelines
-  Proposed Building Setback Lines

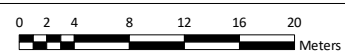
-  Proposed Building Footprints
-  -
-  -
-  -

Erf 9702 Brackenfell South

5.10

PROPOSED BUILDING SETBACKS

SCALE at A3
1:550



JONO TRUST



Job: 26.377 Mxd: Building Setbacks Date: 25 May 2026

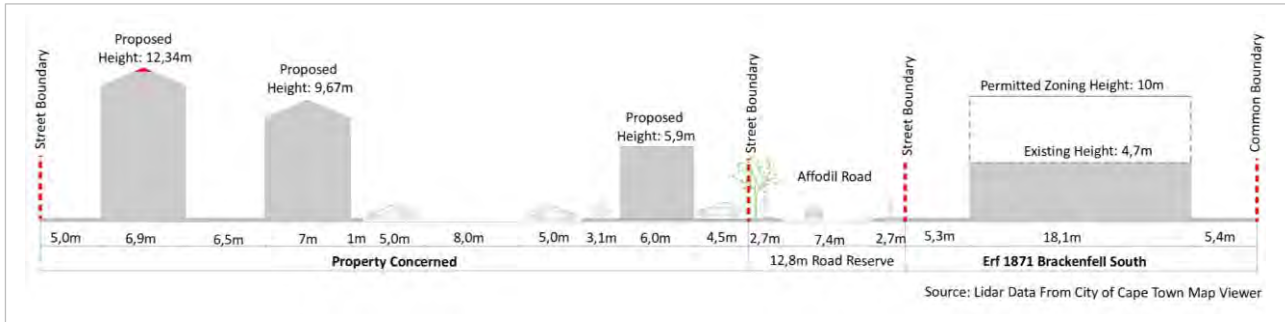


Figure 5.11: Section AA (future) – the red triangle at the roof peak represents the 0,34m height departure

➤ Public Transport

Planning policy promotes land development in locations that have easy access to public transport infrastructure and services. This is an important consideration for future residents who are likely to depend on public transport services.

Figure 5.12: Public Transport shows public transport infrastructure and services around the site:

- Brackenfell PTI and Brackenfell Rail Station are located approximately 1,5km away;
- A mini-bus taxi route runs along Kruis Road adjacent to the site; and
- Taxi and bus routes are located along Old Paarl Road (1000m away).

Kruis Road offers a good north-south connectivity that intersects with key routes (i.e. Old Paarl Road) that allow convenient road-based access to the broader metropolitan region.

➤ Facility Distribution

Figure 5.13: Facilities and Services map the distribution of services and facilities in the local area in order to show that these are easily accessible to the residents of the area. The plan shows:

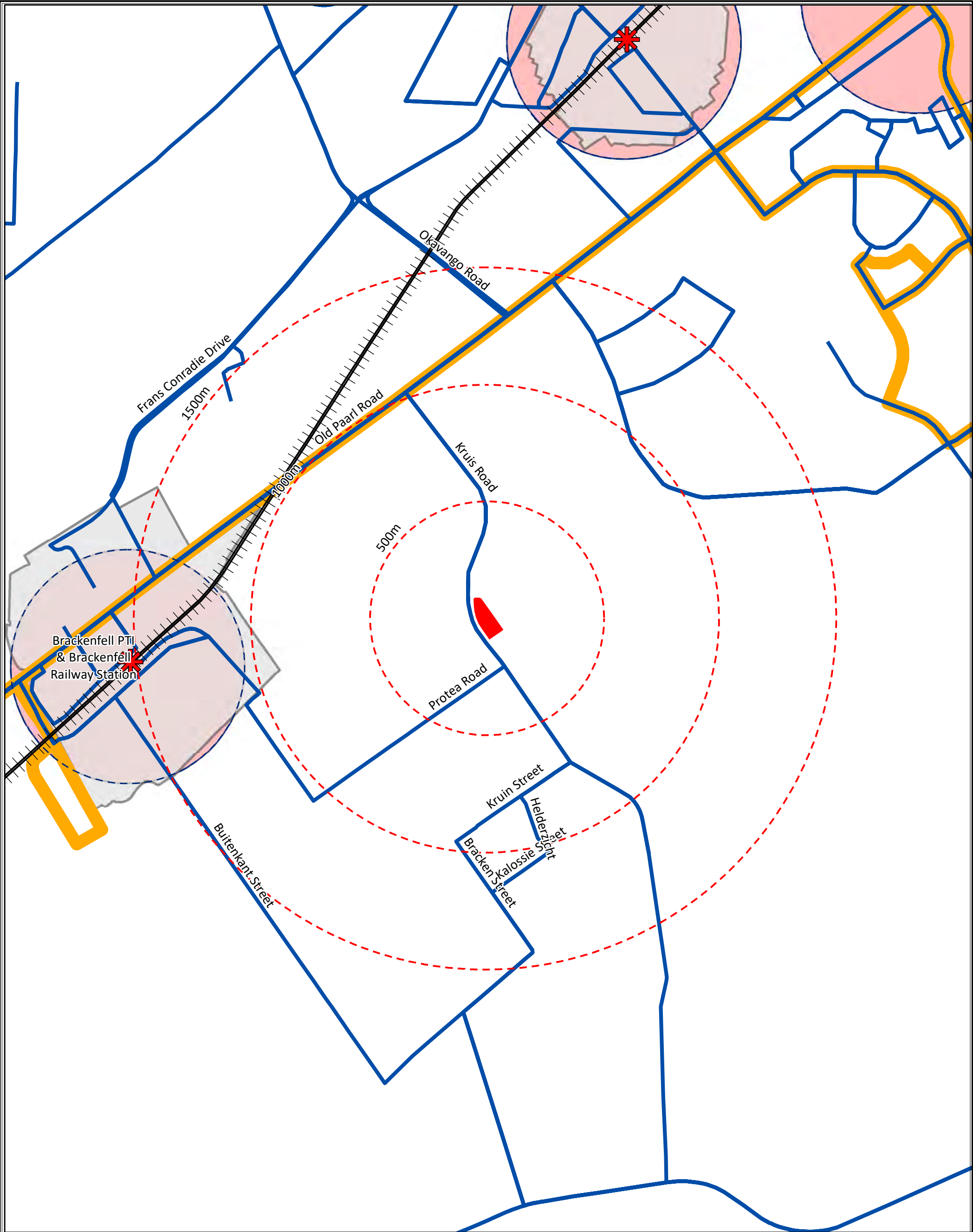
- 7 Places of worship within a 1,5km radius.
- Scottsdene Clinic is located approximately 1,5km from the site.
- 4 Early Childhood Development (ECD) centres within a 1,5km radius.
- There are 4 schools within 1,5km radius and 1 school within 1km radius of the site.
- Brackenfell Fire Station is located with a 500m-radius of the site.

The site has relatively easy access to a variety of social services and facilities.

➤ Impact on the external engineering services

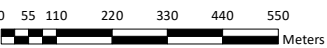
It is critical that the proposed development does not interfere with the municipality's ability to continue to provide municipal engineering services to the existing community. The extent to the proposed development can be accommodated within the existing municipal services network was tested via a request to the City's Water and Sanitation Department. The Department confirmed that for:

- Water Reticulation



-  Site: Erf 9702 Brackenfell South (Approx:11337m²)
-  Surrounding Properties
-  Taxi Routes
-  GABS Route
-  Railway Line

-  PT1 Zone
-  Transport Accessible Precincts
-  500m Radii
-  Railway Stations & Public Transport Interchange
-  -

Erf 9702 Brackenfell South		5.11
PUBLIC TRANSPORT		
SCALE at A3 1:15 000		Meters
JONO TRUST		
Job:25.377	mxid: Public Transport	Date: 14 May 2026

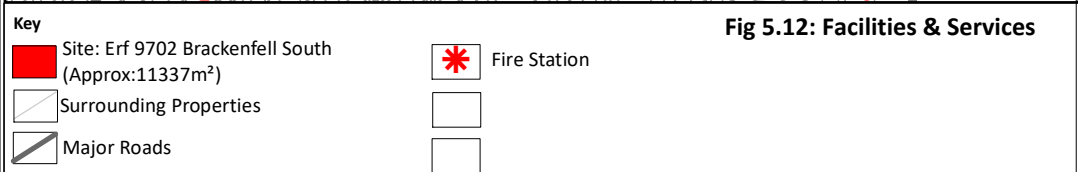
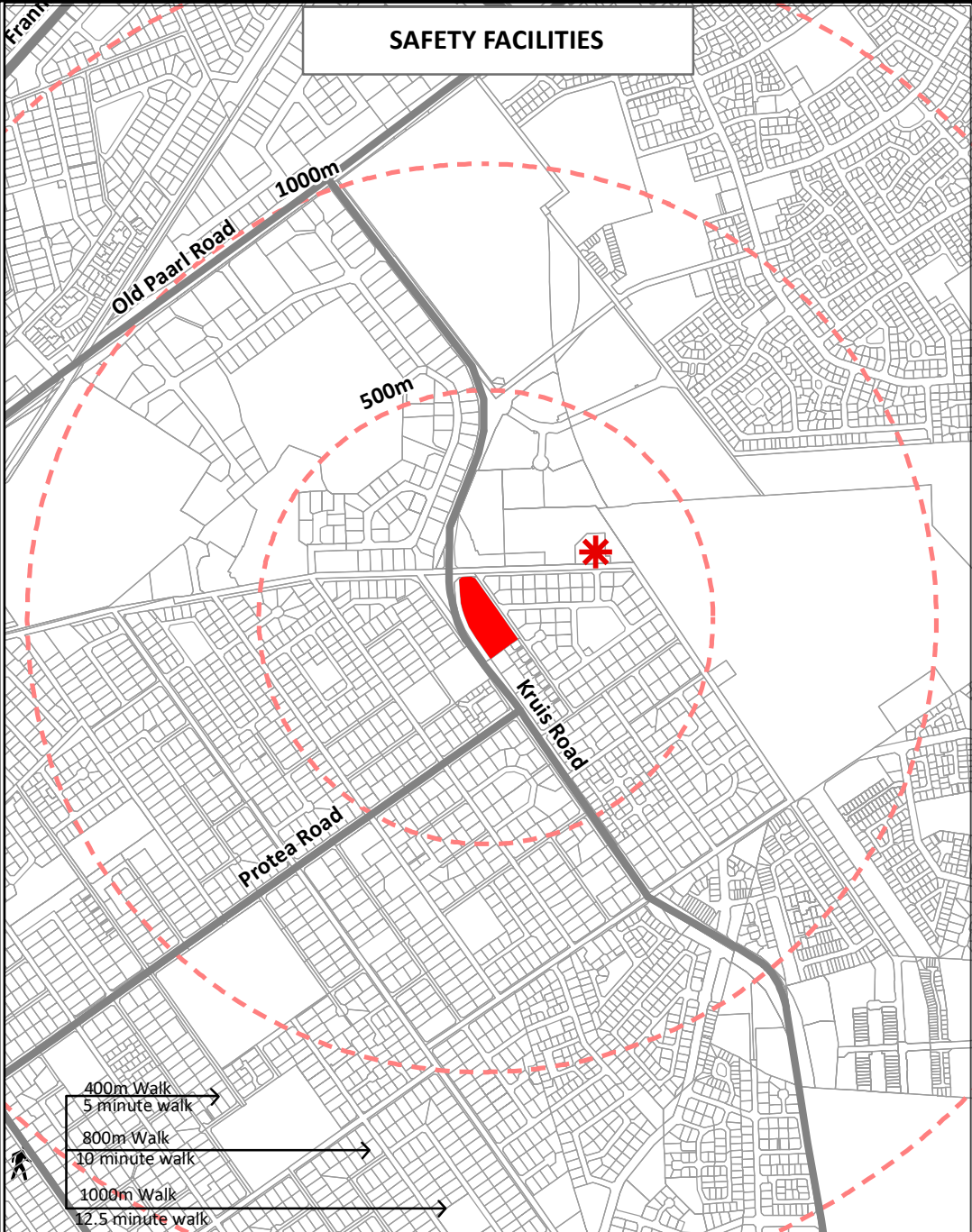
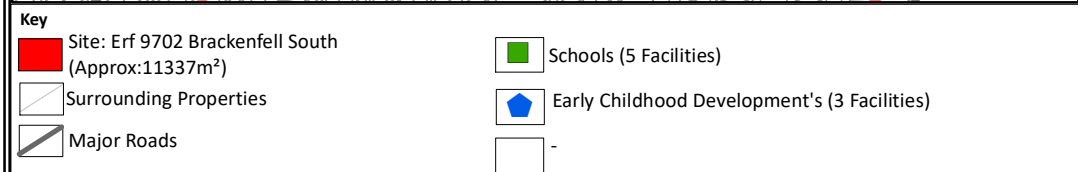
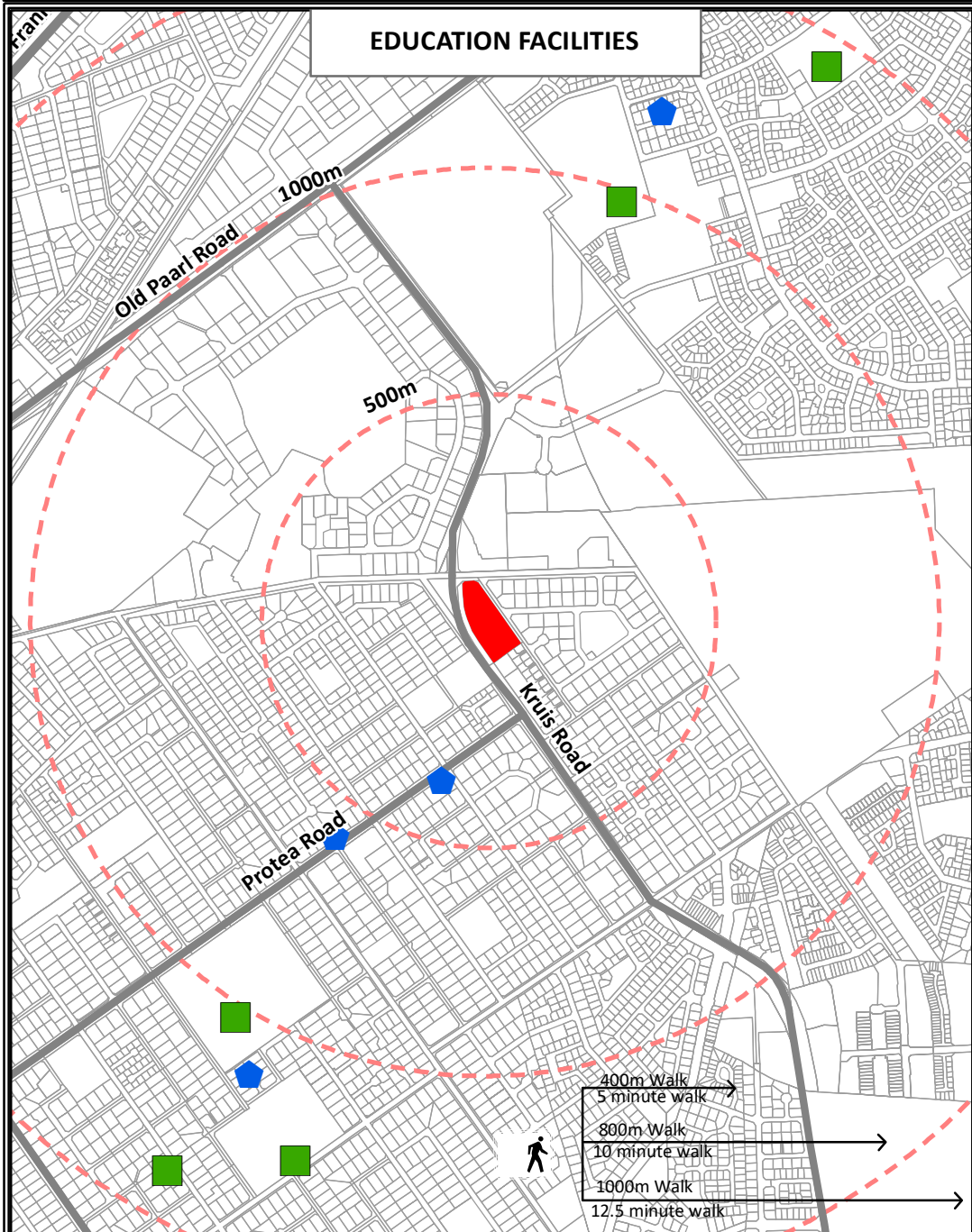
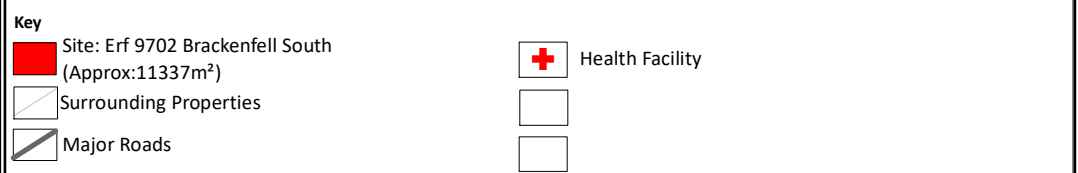
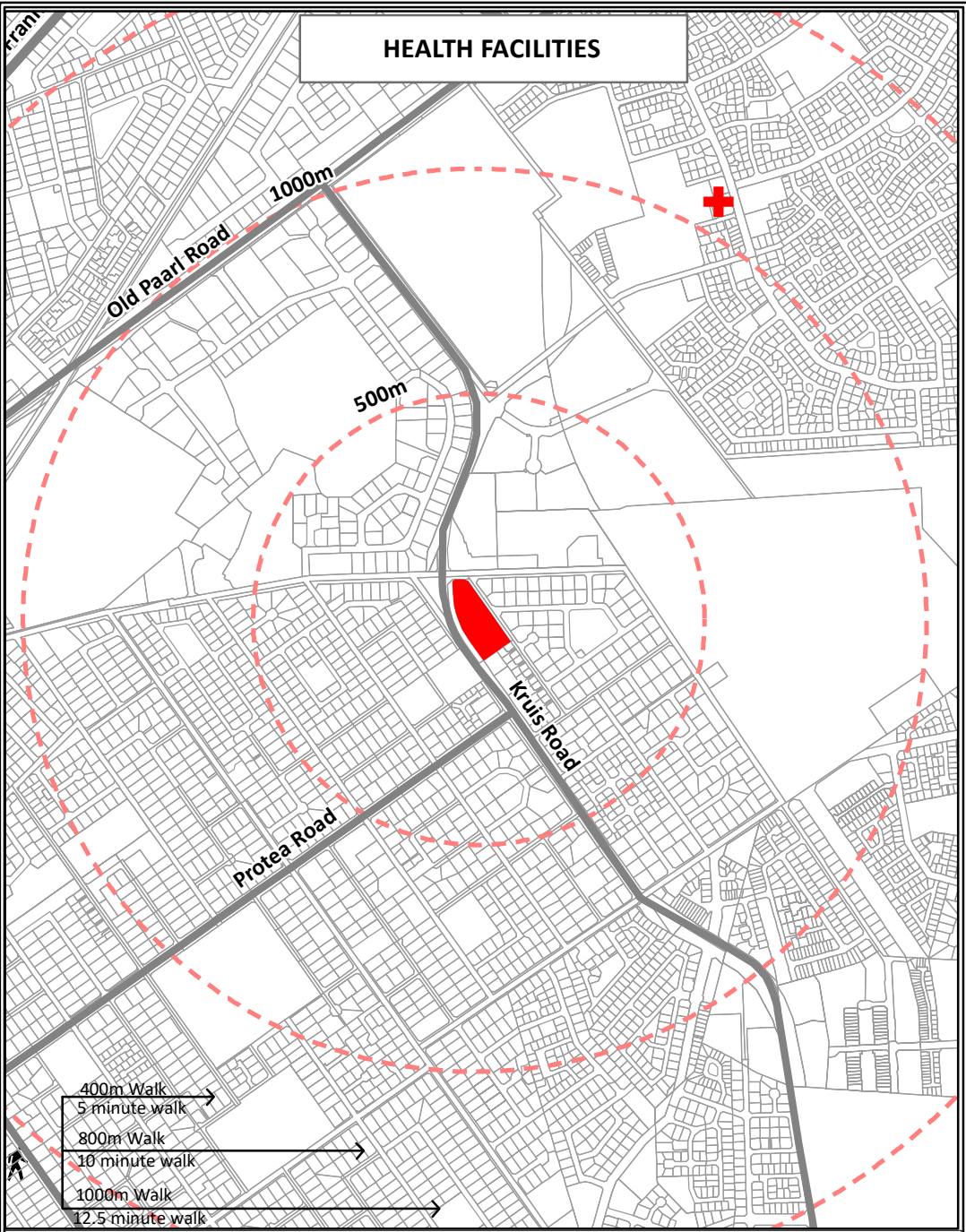
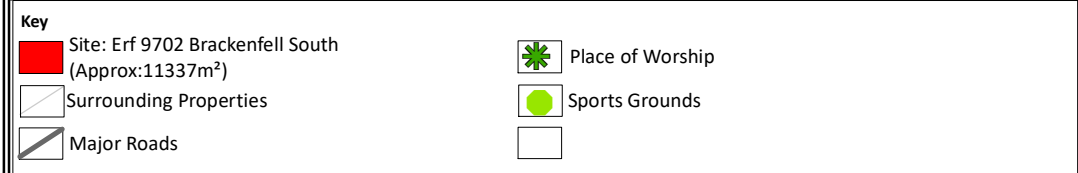
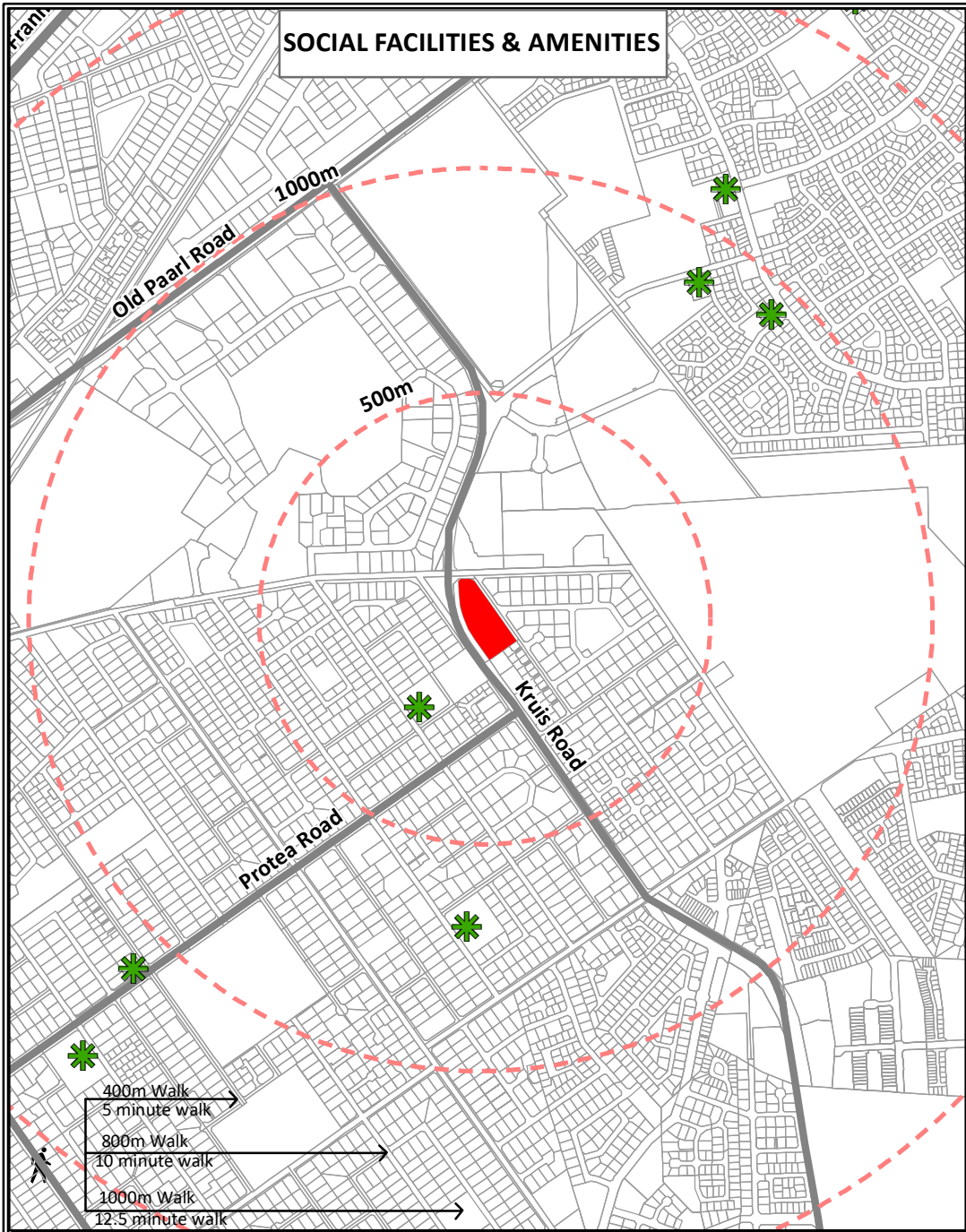


Fig 5.12: Facilities & Services

There is a 100mm diameter pipe in both Kruis Road and Affodil Street that has sufficient capacity to serve the proposed development.

- **Bulk Water**
The department confirmed that bulk water supply has sufficient water resource, treatment, bulk storage, and conveyance capacity to accommodate the proposed development.
- **Sewer Reticulation**
Notwithstanding the constraints in the network, the proposed development can be accommodated prior to the upgrading of the Rietvlei sewer pump station.
- **Wastewater Treatment**
The site falls within the catchment Bellville Wastewater Treatment Works (WWTW). The treatment works has sufficient unallocated spare capacity to accommodate the proposed development.

The Department's confirmation of capacity is attached as **Annexure 10: Water & Sanitation Capacity Letter**.

B2A Consulting Engineers was appointed by the by the City of Cape Town to prepare a Feasibility report, which confirm the following:

- **Existing Electrical Infrastructure:**
 - The existing bulk electrical infrastructure in the area is available at both 11kV and 400V and the capacity is sufficient to cater for the proposed development without significant upgrading required.
- **Proposed Electrical Infrastructure:**
 - A bulk supply to the development will be made available at 11kV in Kruishout Road from the existing underground cable network.
 - The development will include:
 - 11kV distribution from Kruishout Road to miniature substations located within the Development.
 - 11kV/400V miniature substations.
 - Low voltage reticulation from the miniature substations to distribution kiosks along underground cables with aluminium conductors.
 - Consumer supplies from the distribution kiosks to individual single residential erven.
 - kWh meters : Budget energy controllers installed in individual houses.
 - Street lighting consisting of light fittings mounted on steel poles in accordance with the City of Cape Town: Public Lighting requirements.

The Electrical Feasibility report is attached as **Annexure 12: Electrical Feasibility Report**.

➤ **Impact on safety, health, and wellbeing of the surrounding community**

Vacant properties often present safety challenges to local communities, especially when these sites are large with limited activity on the edges.

The development of the site for market related housing and affordable rental housing will:

- Introduce additional 'eyes on the street' through passive surveillance. The design, which intentionally places buildings facing the street, makes it easier for future residents to interact with the public realm (streets).

- The proposed development will increase the range of accommodation typologies available in the area, therefore allowing a wider range of income groups to reside in the area.

➤ **Impact on Heritage**

The proposed development of the site triggered Section 38 of the National Heritage Resources Act. Heritage Western Cape confirmed in writing that further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.

The outcome of the S38 process is attached as **Annexure 11: Heritage NID Outcome**.

➤ **Impact on biophysical environment**

The site does not contain any significant biophysical features or resources and is located within an urban area. The proposed development will not have a significant impact on the biophysical environment.

➤ **Traffic Impacts, parking, access, and other transport related considerations**

Innovative Transport Solutions (ITS) prepared a Traffic Impact Assessment (TIA) (refer to **Annexure 13: Traffic Impact Assessment**) in August 2024 that considered the proposed development on Erf 9702 Brackenfell South.

- **Access**

The proposed development will take access from the fourth leg of the Affodil Street/ Eikenhof Street intersection. Driveway accesses are also proposed along Affodil Street, except for a 45m section, south of Reservoir Street. No direct vehicular access is proposed from Kruis Street or Reservoir Street.

- **Internal Street Layout**

The access to the residential is proposed via an internal road network, which will be 12m wide.

- **Public Transport**

Minibus Taxis:

There is currently a taxi route along Kruis Road. According to the traffic engineer, transport embayment is located along Kruis Road and Old Paarl Road.

Golden Arrow Bus:

There is a bus route along Old Paarl Road.

- **Trip Generation:**

The traffic engineer's report considered 2 development options.

- Option 1:
 - Affordable Housing (115 units)
 - GAPP Housing (30 units)
- Option 2:

- o Affordable Housing (112 units)
- o GAPP Housing (31 units)

Option 1 was subjected to further analysis because this option generated more trips (worst case scenario). Based on option 1, the development is anticipated to generate a total of 82 trips both in the morning and afternoon peak hours.

Please note that the proposal for a retail coffee shop (60m²), which is permitted under the current LB2 zoning, is no longer included in the development proposals.

- **Traffic Impact:**

The total traffic volumes were calculated by adding the expected development trips to the background traffic volumes and then considering the impact on certain road intersections. The resulting impact of the proposed development was found to be:

- Old Paarl Rd/Kruis Rd intersection: 1,1 seconds additional delay due to the development.
- Kruis Rd/Taurus Rd intersection: 2,0 seconds additional delay due to development.
- Kruis Rd/Capricorn Way: 0,1 second additional delay due to development.
- Kruis Rd/ Reservoir Street: 1,6 seconds additional delay due to development.
- Okavango Rd/Old Paarl Rd: 0,3 second additional delay due to development.

The TIA found that the proposed development will have a relatively low impact on the surrounding road network.

- **Parking:**

The By-Law requires 1 bay per dwelling unit (146 parking bays for 146 units).

However, the TIA reported on a parking survey conducted at other affordable rental developments to determine a parking rate based on after-hours occupancy that is appropriate for affordable accommodation. An after-hours parking survey was conducted at the Drommedaris development in Brooklyn and at the Bothasig Gardens development in Milnerton / Bothasig, and an average parking rate of 0,45 bays/units was derived from the survey.

Based on the TIA's recommended parking ratios based on actual usage at other similar developments, a total of 65,7 bays are required for the proposed development of 146 affordable units. The development proposal will provide 31 parking bays for GAPP market-related housing and 96 parking bays for Affordable Rental Housing.

The Traffic Engineer deems the proposed parking opportunities sufficient.

- **Recommendations:**

- Any upgrades along Kruis Road and Reservoir Street should consider the planned cycle routes.
- It is also recommended that sidewalks be constructed along all development site frontages.

The traffic assessments confirm that the proposed development will have a relatively low impact on the local road network.

The August 2024 TIA (**Annexure 13: Traffic Impact Assessment**) was re-evaluated in June 2026 (**Annexure 14: Traffic Impact Assessment Review**) in order to determine whether the assumptions, methodology and

conclusions remained appropriate and valid in 2026. The TIA June 2026 review confirmed that the 2024 TIA remains valid and consistent with current industry practice and continue to provide a sound basis for assessment.

The August 2024 TIA review also confirmed that the multiple accesses along Affodil Street (Class 5) are not prohibited and does not deviate from the existing functionality of the road, nor does it breach any guidelines.

➤ Proposed Conditions of Approval

The DMS does not require the approval of an SDP for the development of flats when owners act on existing LB2 rights. However, the proposals contained in this application report does suggest that buildings be set back from street and common boundaries and includes controlled access to the on-site recreation area adjacent to Erf 22355.

It is therefore proposed that the following conditions of approval are inserted to manage the development:

Development / Operational Issue	Proposed Condition
Ensure that the general public enjoys controlled access to the proposed recreational area adjacent to Erf 22355 Brackenfell South.	A right-of-way servitude shall be registered across the recreation area adjacent to Erf 22355 Brackenfell South in favour of the general public to permit controlled access and use thereof during daytime hours.
Introduce setback controls that mitigate potential impact.	A development setback of 4,5m along the southern common boundary, eastern and northern street boundaries and 5,0m from the western street boundary is proposed (refer to Figure 5.6: Proposed Building Setbacks).
Detailed Site Development Plan to be defined by a future developer.	A detailed Site Development Plan (SDP) for the property is to be submitted to and for the approval of the Delegated Official prior to the submission of any building plans for the development. Particular attention must be paid to the interface between the property and the abutting erven, on-site parking provision, vehicular circulation through the development and compliance with the provisions of the Urban Design Policy (2024) in respect of overlooking onto public spaces, among others. The SDP must indicate the following: • Location of services (existing and proposed) including associated servitudes (existing and proposed), • Boundary treatment including fencing/walling if applicable, • Stormwater treatment, • All access points (comprising access and egress) as well as traffic circulation and parking, • Details of built form, showing inter alia, elevations, building citing, orientation, and architectural style to be employed. • Buildings along the southern common boundary limited to a maximum of three storeys (9,67m above existing ground level) and how it interfaces with abutting properties, • Buildings along the western, northern, and eastern boundaries and how it interfaces with the public realm.

6.0 SUMMARY AND CONCLUSION

The City of Cape Town intends to facilitate the development of affordable market-related units (31 units) and affordable rental units (115 units) on Erf 9702 Brackenfell South. The property's LB2 zoning permits the proposed dwelling units (31 units) and flats (115 units) as of right.

The applications contained in this motivation is not concerned with use (i.e. it does not involve a rezoning because the LB2 zoning exists). Instead, departure applications made:

- To permit 127 parking bays instead of 146 bays. The departure is supported by a TIA, which derived a reduced parking ratio based on actual parking occupancies on similar developments.
- To permit the buildings along Kruis Road to rise to 12,34m instead of 12,00m. The departure affecting 34cm of the roof will not have a negative impact on neighbouring properties.
- To allow more than 2 CWCs on Affodil Street and to allows these to be less than 12,0m apart:
 - o CWC 2 to be 9,5m away from CWC 3 in lieu of 12m.
 - o CWC 3 to be 9,4m away from CWC 4 in lieu of 12m.
 - o CWC 4 to be 2,5m away from CWC 5 in lieu of 12m.

The applications are motivated on the basis that:

- The proposals comply with planning policy and planning law;
- The proposals are appropriate to the local area in respect of the proposed use and form;
- The proposals are supportive of the City's investments into public transport infrastructure; and
- Sufficient spare capacity exists within the municipal service network to accommodate the proposed development without jeopardising services to existing residents.

The motivation report also proposes that is appropriate to setback new buildings from the boundaries. This will allow the future development to better manage the interface with the roads and neighbours.

The City of Cape Town has, through its Municipal Spatial Development Framework and District Plans, described a vision for the city where all citizens benefit from an environment which is safe, which addresses their basic needs, provides adequate and appropriate shelter and provides a nurturing public environment that is easily accessible via public transport services. The support of the development proposals and the approval of the development applications on Erf 9702 Brackenfell South will assist the City in moving towards its vision as a 'City of Hope'.

JONO TRUST PROFESSIONAL PLANNERS