

**BRT - BUS RAPID TRANSIT PROPOSALS:
Densification and Flatland along Oxford Road - Will the Express Bus Route affect YOU ?**

Our consulting town planner comments on the proposed BRT land use management system linking Parktown to Sunninghill

Metro's Proposal:

1. The BRT is an initiative that seeks to facilitate the construction of the required infrastructure for Express Buses, and to ensure profitability by increasing the passenger volume to no less than 100 riders per hour during off-peak times. The proposal therefore is to increase the densities of apartment buildings within a 15-minute walking distance of the transit route and its bus stations to 80-100 dwelling units per hectare.
2. The densification proposals include a zoning map, a Standard Land Use Management System Table ("SLUMST") and a Density Bonus Programme.
3. The map shows that the Parktown area is affected by two BRT routes, one along Empire Road, and the other from the proposed interchange on Empire Road along Victoria Avenue and Oxford Road. This is covered by Zones 1A, 1B and 5 of the SLUMST:
 - Zone 1A: A high density mixed use zone permitting an FAR (Floor Area Ratio) of 2.4 and a height of 4 storeys
 - Zone 1B: A medium density mixed use zone permitting an FAR of 1.2 and a height of 3 storeys, and
 - Zone 5: A low density residential zone at 20 dwelling units per hectare
4. The Density Bonus Programme applies where the voluntary provision of certain social facilities will enable the developer to add to the basic rights, and will be negotiated with the City planners.

Comments and Cautions:

5. At this stage the physical implementation of the required road improvements has not been addressed. This aspect would be preceded by an environmental impact assessment. It is therefore not clear what the bus route will look like, how the central two-lane bus road will fit into the current road reserves, what the effect on street trees and services infrastructure will be, how access to properties along the route will be impacted and the like. Neither is it clear what the timeframe for the implementation will be.
6. While we agree with the need for improved public transport facilities and land use supporting the facilities, it is important that the liveability and quality of environment in the affected areas are not destroyed. The balance contained in the City Vision in the IDP should not be abandoned in pursuit of one component of that vision, namely efficient movement.
7. The proposals are generic in nature and do not relate to the actual development in the areas along the BRT. They do not display any insight into the nature of the areas, the socio-economic make-up, the land uses, the heritage issues, the street and block layout, and the like. A quick evaluation of the Parktown area will show that much of the route is adjacent to office, open space, heritage and institutional uses. How will it work here? What about the availability of engineering and electrical services - and other urban infrastructures
8. The approach is formulaic, and not dissimilar to the recently abandoned density tables tried in the RSDFs. There is no indication how the quantum of densities was derived, nor how the bonuses were determined. Has this approach to influence the private development market worked elsewhere? What alternatives were evaluated? How will the planners in the City cope?
9. It would seem that the implementation and physical manifestation of the policy is largely intuitive, as is the desired impact on the viability of the BRT. It would not be wise to implement an untried and untested policy. A full and proper evaluation of the proposal and its outcomes is required, as well as an indication of some of the alternatives that were considered.
10. **Conclusion:**
 - The promotion of an integrated land use and public transport system is supported, but the detail of the design of the BRT and an evaluation of its impacts needs to be known to inform the public.
 - The policy for densification and its application does not appear to have been adequately scrutinized. A similar formula approach to densification was recently abandoned by the City as its consequences had not been foreseen.
 - The policy is sectoral and not aligned with the need for capacity upgrades for infrastructure services. Vast areas in the City have already been allocated for densification and negotiated with the citizens through the RSDF processes.
 - A more balanced approach to city development should be followed, rather than one based solely on public transport.
 - The interface planning and principles between higher and lower intensity uses must be given attention.
 - The capacity of the city's planners to attend to urban management matters as opposed to development control implementation requires attention.