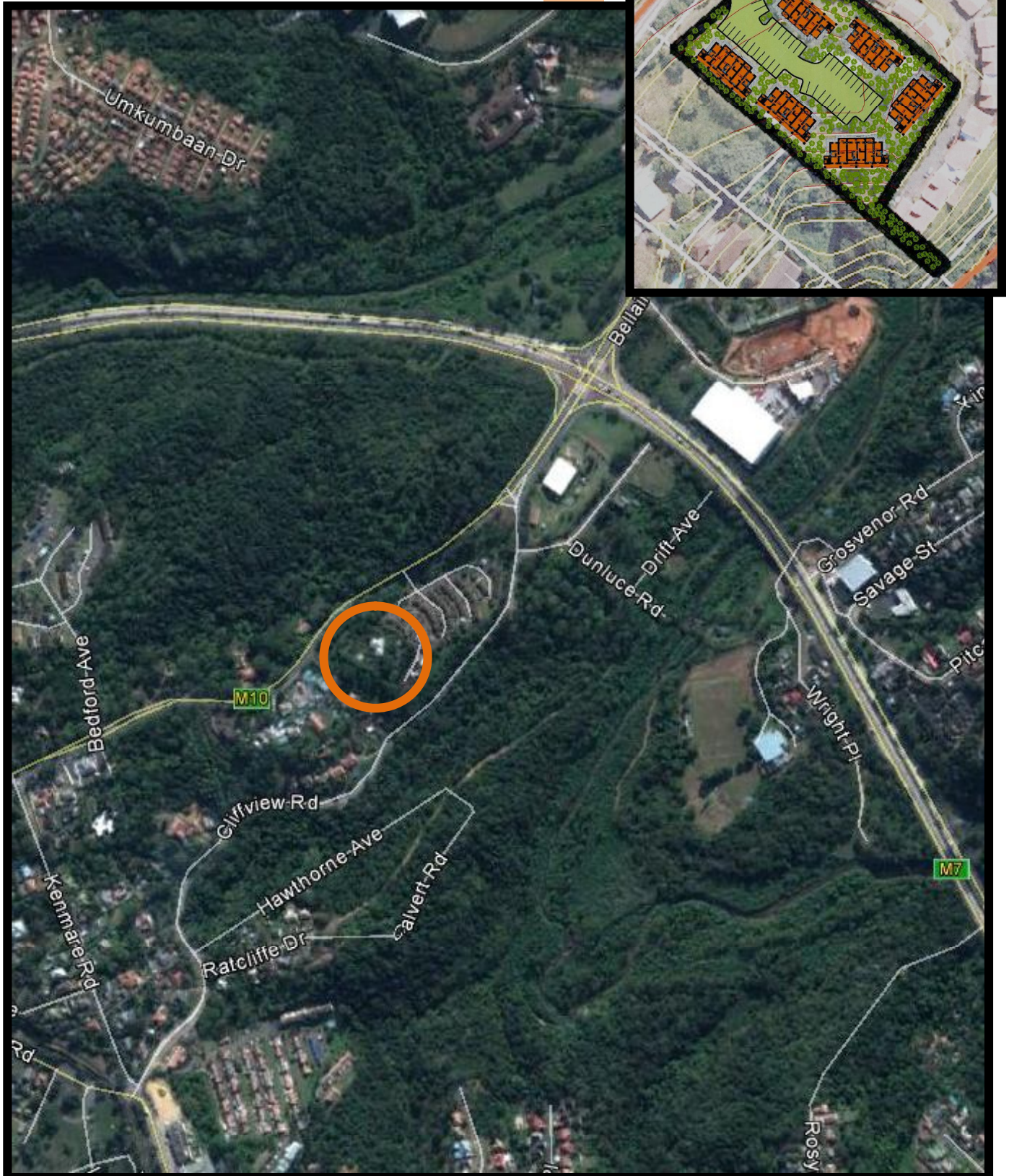


APPLICATION FOR REZONING OF PORTION 47 OF ERF 8, BELLAIR FROM DUPLEX 900 TO GENERAL RESIDENTIAL 3



APPLICATION FOR REZONING IS HEREBY MADE:

IN TERMS OF THE KWAZULU PLANNING AND DEVELOPMENT ACT, 2008 (ACT NO. 6 OF 2008)

APPLICATION FOR REZONING OF PORTION 47 OF
ERF 8 BELLAIR
157 WAKESLEIGH ROAD, BELLAIR
FROM DUPLEX 900 TO GENERAL RESIDENTIAL 3

APPLICANT:

DIVINE INSPIRATION TRADING 564 PTY LTD

209 UMHLANGA ROCKS DRIVE

UMHLANGA

DURBAN

TEL: (031) 563 8180

SUBMITTED TO:

ETHEKWINI MUNICIPALITY

CENTRAL OPERATIONAL ENTITY

DEVELOPMENT AND PLANNING UNIT

REZONING DIVISION

JUNE 2012

BELLAIR

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EXECUTIVE SUMMARY

This report provides motivation and background to enable the rezoning of:-

- PORTION 47 OF ERF 8 BELLAIR, FROM DUPLEX 900 TO GENERAL RESIDENTIAL 3

Situated at 157 Wakesleigh Road, Bellair.

The site is currently occupied by a dilapidated house and is located within a fully developed context in close proximity to other residential and social development. A key feature of the existing site context is the limited topographic constraints, which permit the site being utilized for residential development. The subject property is owned by Divine Inspiration Trading 564 Pty Ltd. The proposal encompasses the rezoning from Duplex 900 to General Residential 3 to accommodate residential units. As per the scheme controls, a maximum of 131 units can be achieved on the site. It is anticipated that a greater degree of compatibility and market relevance can be obtained through the above rezoning. The above type of development envisaged can be termed as gap or social housing.

"social housing" means a rental or co-operative housing option for low to medium income households at a level of scale and built form which requires institutionalised management and which is provided by social housing institutions or other delivery agents.

"gap housing" is a term that describes the shortfall, or 'gap' between residential units supplied by the state which cost R100 000.00 and less and houses delivered by the private sector which are not less than R250 000.00. The gap housing market comprises people who typically earn between R3500.00 and R15000.00 per month, which is too little to enable them to participate in the private property market, yet too much to qualify for state assistance.

This type of development also aligns with the densification model which the Ethekwini Municipality is striving towards.

"densification" is the increased use of space both horizontally and vertically within existing areas / properties and new developments accompanied by an increased number of units and/or population threshold.¹

The motivation for rezoning is underpinned by several themes. The overarching motivating factor is that the rezoning would allow for development, which is consistent with its context and in promoting Bellair as an area suitable for residential housing options, which does not detract from or negatively impact on the surrounding area and amenities.

The first pillar that underpins the motivation is that key trends at a broader level support and inform the motivation for rezoning. These are:

The demand for residential development, in a safe and established housing environment allowing individual ownership;

The second pillar that underpins the motivation for rezoning is the potential use of the site to contribute to, and be mindful of, the local context. Key issues for consideration here include:

- Scale and Intensity of Development: The proposed zone would allow for residential accommodation that recognises the existing residential scale and intensity of surrounding development.
- Amenity Considerations: The proposed rezoning allows for the development of additional housing that does not detract from local amenity.

Due to the nature of the rezoning (proposed use), no additional impact is foreseen. In addition, the development is proposed in an already developed context, and therefore no negative environmental impacts are envisaged, however an environmental assessment has been completed and is attached as Annexure D.

¹ ETHEKWINI MUNICIPALITY – SPATIAL DEVELOPMENT FRAMEWORK (Draft Report for Internal Comment and Input March 2012)

The proposed rezoning encompasses the rezoning of Duplex 900 to General Residential 3.

The proposed controls for General Residential 3:

- Minimum Plot Size: 900m²
- Coverage: 40 %
- Min. Rear Space: 1.2m per floor up to max. of 15m
- Min. Building Line: 7,5m
- Min. Side Space: 1.2m per floor up to max. of 15m – minimum 3,0m
- Parking Requirements: 1 Parking bay per dwelling unit

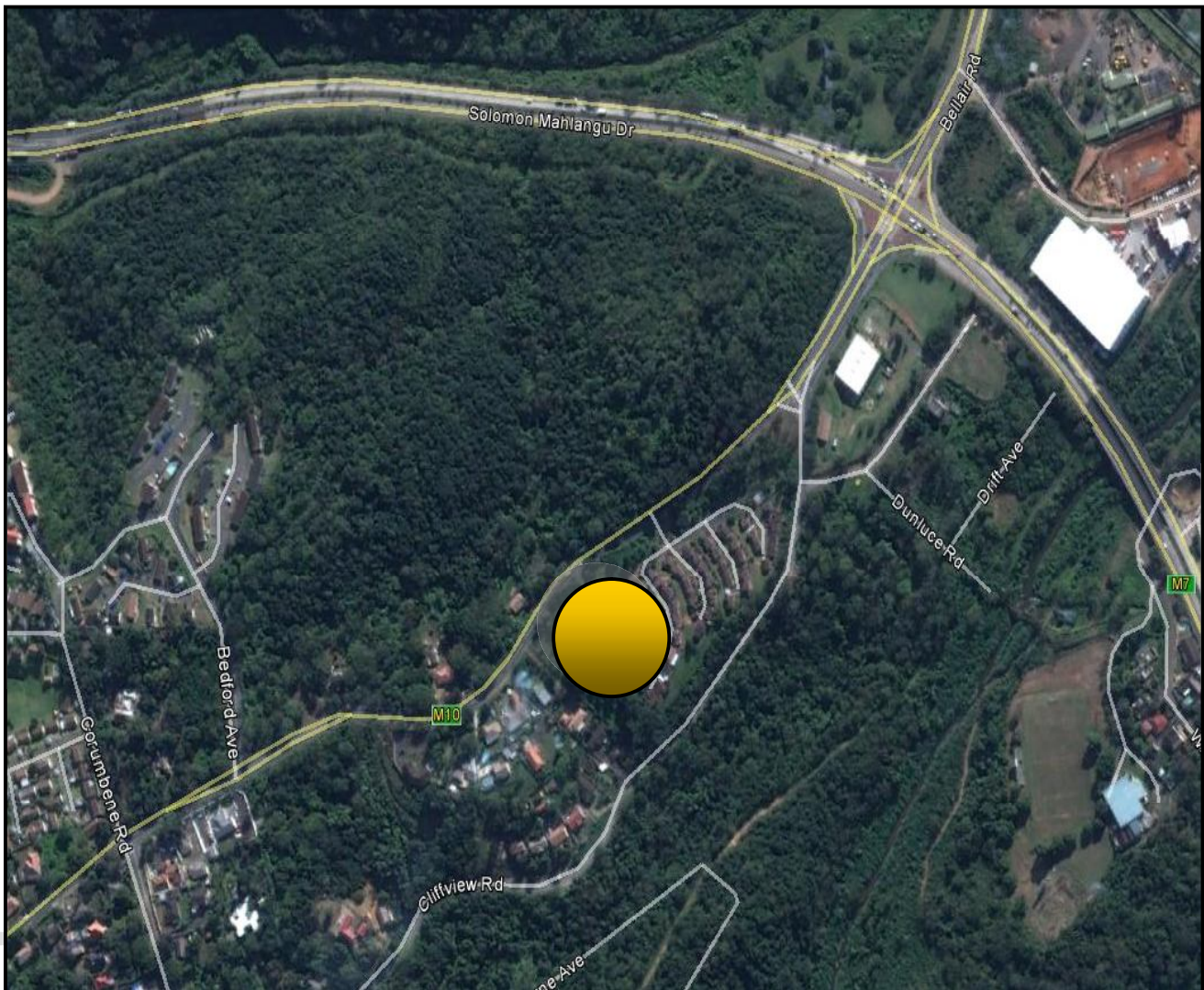
The proposed controls are also attached as Annexure C.

The existing controls for Duplex 900 are as follows:

- Minimum Plot Size: 900m²
- Coverage: 40 %
- Height: 2 Storeys
- No. of Units: One Dwelling unit per 400m² of the site
- Min. Rear Space: 5m
- Min. Building Line: 7,5m
- Min. Side Space: 3.5m
- Parking Requirements: 1 parking bay per dwelling unit

The existing controls are also attached as Annexure B.

Following the above proposed and existing controls, it can easily be seen that Duplex 900 will not suit the current densification strategy therefore rezoning to GR3 will align with this strategy.



1. INTRODUCTION

1.1 PURPOSE OF THE REPORT

This report has been submitted to the EthekeWini Municipality – Central Operational Entity, for the purpose of motivating and providing adequate background to enable the rezoning of Portion 47 of Erf 8 Bellair situated at 157 Wakesleigh Road. The site is located in an established and developed context and is subject to an existing Town Planning Scheme within which it is currently zoned Duplex 900. This proposal therefore aims at motivating for the rezoning of the site from Duplex 900 to General Residential 3. The zone is aimed at accommodating residential development in the form of residential units which aim at accommodating people who fulfil the gap market criteria.

1.2 BACKGROUND

Much impetus of similar type of housing by EthekeWini Municipality has been concentrated in areas such as Newlands, Phoenix, Chatsworth and KwaMashu. Bellair which lies approximately 10-12km from the CBD can also be identified as an area that can accommodate additional housing. Although private in nature, the intentions and target is relatively the same and this type will follow this precedent as we are given to understand that all these existing developments form part of a winning formula.

The site has the potential to provide multiple units in the form of two / three storey flats and help in the alleviation of housing shortages within the municipality. In an effort to maximize and ensure the full potential of the site, rezoning is required.

Application for rezoning is therefore hereby made in terms of the *KWAZULU PLANNING AND DEVELOPMENT ACT, 2008 (ACT NO. 6 OF 2008)*

This report therefore presents the motivation for rezoning the site from Duplex 900 to General Residential 3 and attempts to provide adequate background and motivation to facilitate the process of rezoning.

1.3 STRUCTURE OF THE REPORT

Following the Executive Summary, this application is structured in the following manner:

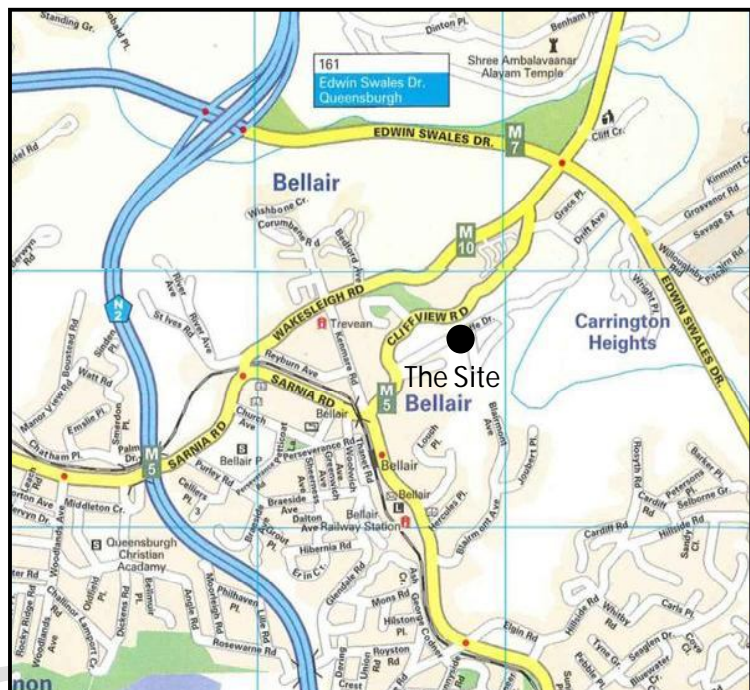
Section 1 presents the introduction, and provides an overview of the purpose of the report and the background to the project.

Section 2 - 6 presents the site analysis, proposed use and site development plan and need and desirability motivation for the site.

Section 7 provides a conclusion for the rezoning application.

Section 8 includes all supporting documentation and annexures.

SITE LOCALITY – Metropolitan and Local Context



Enjoys good access via Wakesleigh Road and Cliffview Road.

- Existing road structure allows for good permeability.
- Well situated in terms of overall locality in terms of bus and taxi routes.
- Wakesleigh Road forms a major link between existing high order roads.
- Close proximity to major social facilities.
- Close proximity to major commercial activities.
- Currently occupied by an existing dilapidated house within a fully developed context.
- Appropriately suited for additional residential development.
- Adequately serviced in terms of infrastructure.
- Excellent accessibility which allows for choice.

BELLAIR

2.0 THE SITE

2.1 CADASTRAL DESCRIPTION

The subject property is described as Portion 47 of Erf 8 Bellair, situated in the Southern region of the Central Operating entity of the EThekwni Municipal Area, Reg Division FU, Province of KwaZulu-Natal. The site gains access from Wakesleigh and Cliffview Roads respectively.

2.2 OWNERSHIP AND EXTENT

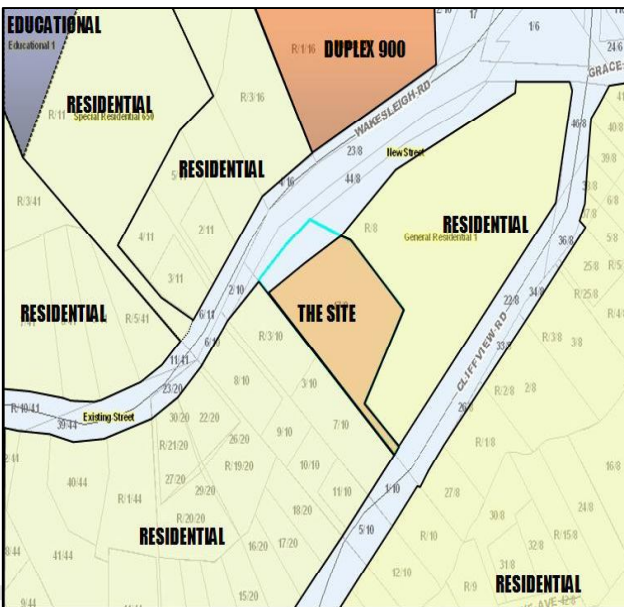
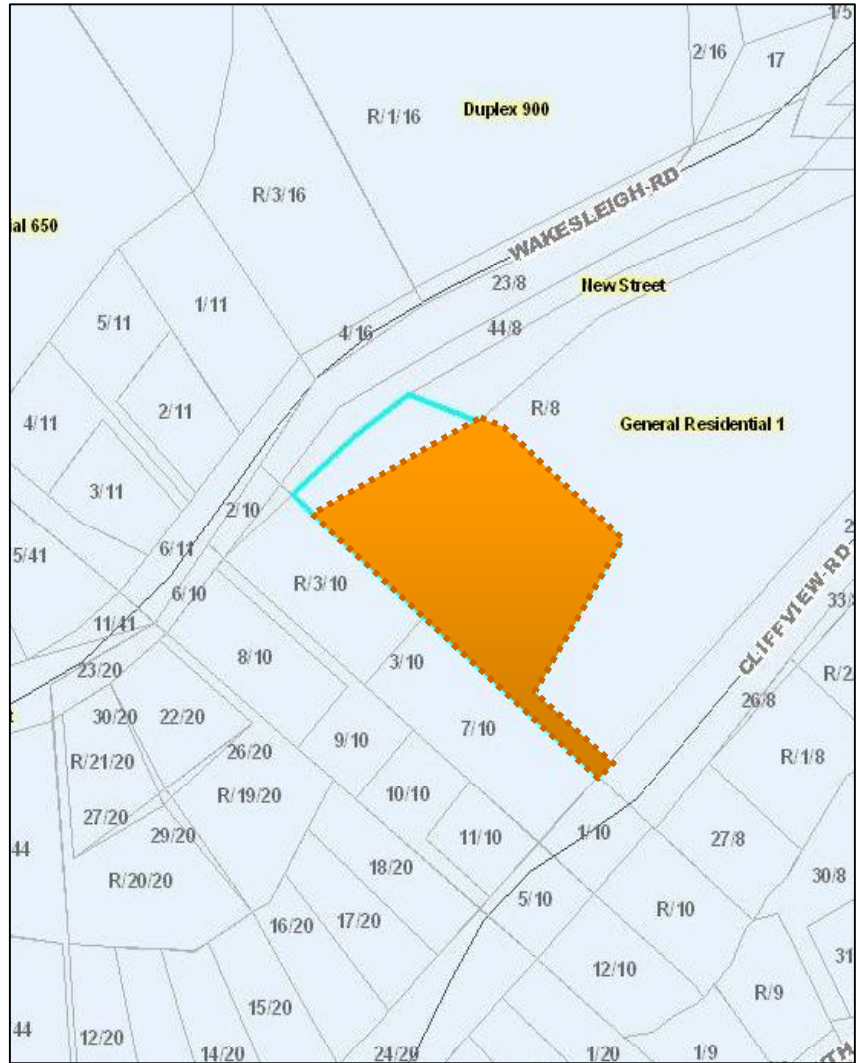
The property is owned by Divine Inspiration Trading 564 Pty Ltd. The total area of the property is 5546 m² in extent.

2.3 EXISTING ZONING

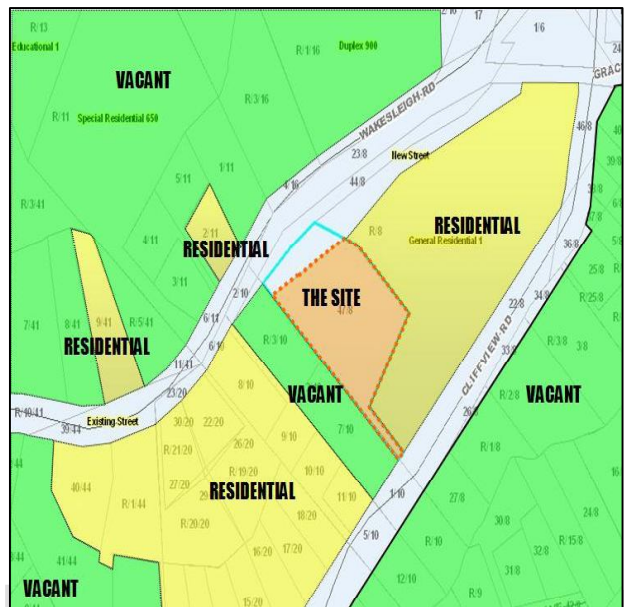
The site is currently zoned as Duplex 900 with immediate surrounding land uses accommodating predominantly Residential and Public Open Space.

2.4 EXISTING LANDUSE

Immediate surrounds is predominantly vacant. North-East of the site is residential in the form of units.



EXISTING ZONING



EXISTING LAND USE

2.5 THE SITE CONTEXT

The site is currently occupied by a dilapidated house and located within a partially established context.

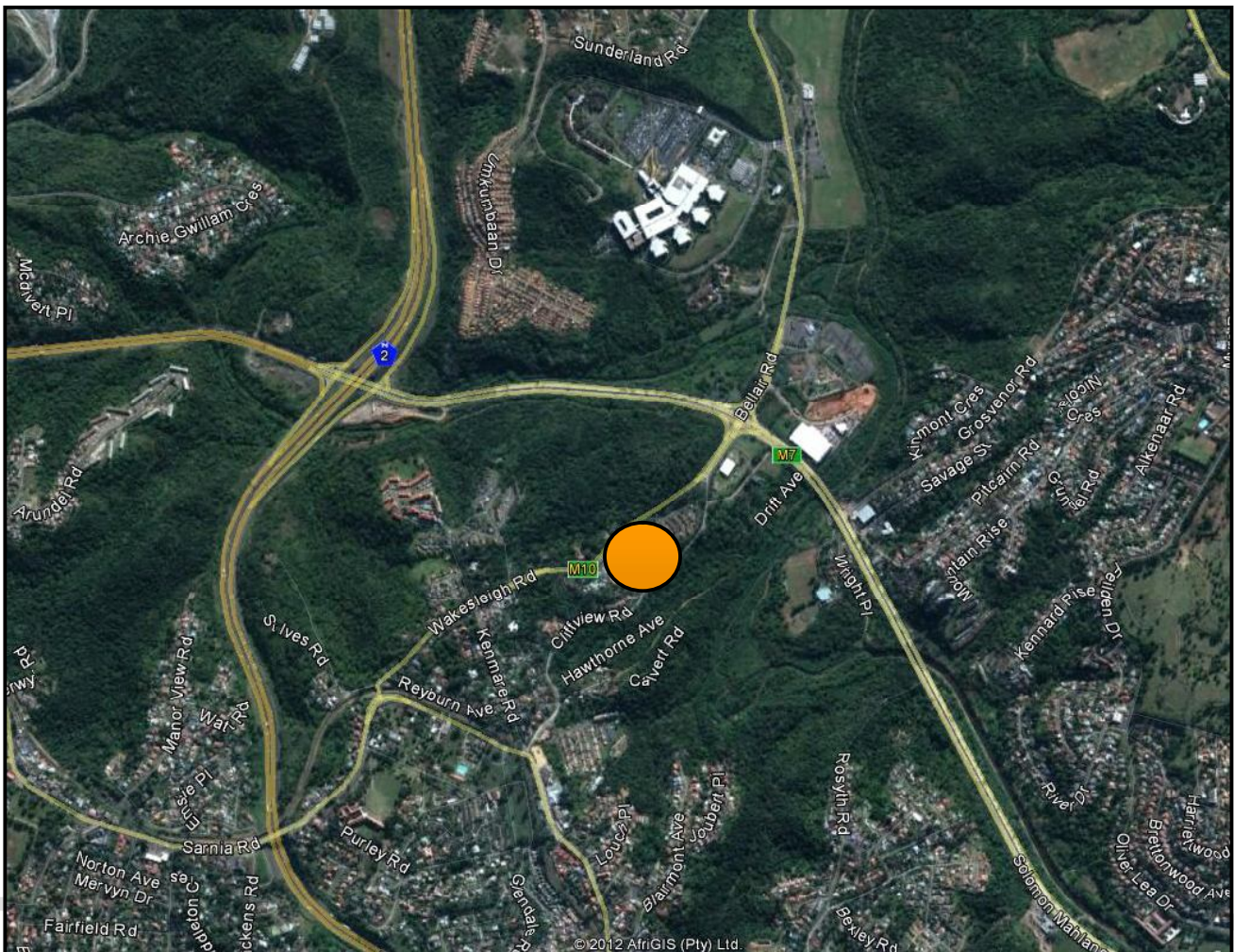
- The property gains direct access from Wakesleigh Road and Cliffview Road which further join to form Vusi Mzimela Road (Bellair Road), a major link between Bellair and Solomon Mahlangu (Edwin Swales Drive). These roads are considered as major transportation routes.
- The site is bounded by Wakesleigh Road to the north-west, Cliffview Road to the south-east, general residential development to the north-east and vacant land to the south-west. Residential development north-east of the site is in the form of duplex units and a similar approach is envisaged, only difference is the introduction of 3 storeys.
- Minimal development surrounds the site however the context is well established with various housing types, institutional development and light industrial development.

Social facilities such the worship and education are easily accessible and within walking distance.

- Albert Luthuli Hospital is in close proximity to the site and this is regarded as a major facility.

The above suggests that the site is strategically located and well facilitated, hence the envisaged development will enjoy the benefits of the amenities and facilities provided by the site's context.

- Being located within a fully developed context, the site enjoys the benefit of existing infrastructure that is sewer, water and electricity.



BELLAIR

3. THE PROPOSAL

3.1 ZONING PROPOSAL

The proposed rezoning encompasses the rezoning of Duplex 900 to General Residential 3 to accommodate residential development in a form of multi-storey flats.

The proposed controls for this zone include coverage of 40%, F.A.R OF 1:3 and height restriction of 15m. (See proposed zoning controls as Annexure C)

It is anticipated that a greater degree of compatibility and market relevance can be obtained through the above rezoning.

3.2 GENERALISED IMPRESSION OF FUTURE USES

The proposal is based on the provision and development of approximately 6 blocks with 9 and 6 units per block, internal access road and parking. Communal areas within the development will be grassed and certain areas will be paved. An area close to the main access will be demarcated for the purpose of refuse collection. No other land use is proposed on the site. The parking area will serve as stormwater attenuation and certain times as play areas. Communal areas will be grassed and trees will also be planted. This is in line with the current context which depicts a green picture. Refer to Annexure E Proposed Site Development Plan.

3.3 ACCESSIBILITY

It is envisaged that the future ingress and egress will be from Wakesleigh Road. Utilising this road as the main access allows the residents options in gaining access to the surrounding major roads. This also alleviates any pressure points that may arise. The panhandle to Cliffview Road could be utilized as a pedestrianised access.

3.4 ENVIRONMENTAL CONSIDERATIONS

Refer to Annexure E - Environmental Overview and Comments prepared by Nature and Development Group of Africa.

3.5 TRAFFIC CONSIDERATIONS

The proposal accommodates 6 residential blocks yielding approximately 45 units. This will be contained within three and two storey residential blocks. The design is based on acquiring access from Wakesleigh Road which is regarded as a residential collector. This allows for options that has less of an impact in terms of the overall traffic. Development along Wakesleigh Road is minimal and therefore the introduction of this development will certainly not have an impact on the existing traffic flow.

3.6 ENGINEERING CONSIDERATIONS

As the subject site is located in an area with adequate existing services infrastructure and capacity in terms of roads, sewer, electricity and storm-water reticulation, no further upgrading or provision of new engineering services is anticipated, however the new development will connect into the existing infrastructure.

3.7 SITE PHOTOS



EXISTING RESIDENTIAL DEVELOPMENT ALONG THE BOUNDARIES OF THE SITE AND WITHIN THE WIDER AREA.

RESIDENTIAL DEVELOPMENT RANGE FROM SINGLE TO DOUBLE STOREY RESIDENTIAL



EXISTING DILPIDATED HOUSE SITUATED ON THE PROPERTY. THE HOUSE HAS BEEN TOTALLY VANDALISED AND ANY THOUGHT OF RESTORATION WILL PROVE TO BE EXTREMELY COSTLY.

ILLEGAL DUMPING OF BUILDING MATERIAL IS ALSO EVIDENT.

IN ITS CURRENT STATE, THE SITE DOES NOT FIT INTO THE EXISTING CONTEXT. THERE HAS ALSO BEEN CONCERN RELATING TO VAGRANTS RESIDING THERE AND THE INCREASE IN THEFT WITHIN THE AREA.

BELLAIR

4.0. PLANNING DESIGN PRINCIPLES AND APPROACHES

ESTABLISHING A DEVELOPMENT STRUCTURE, i.e. identifying basic structuring elements which provide development guidance, certainty, growth opportunities and flexibility,

- FACILITATING INTEGRATION, i.e. ensuring appropriate vertical and horizontal linkage of policies, intentions and development,

CREATING GENERATIVE SYSTEMS, i.e. encouraging the establishment of development which generates additional activities, variety and growth,

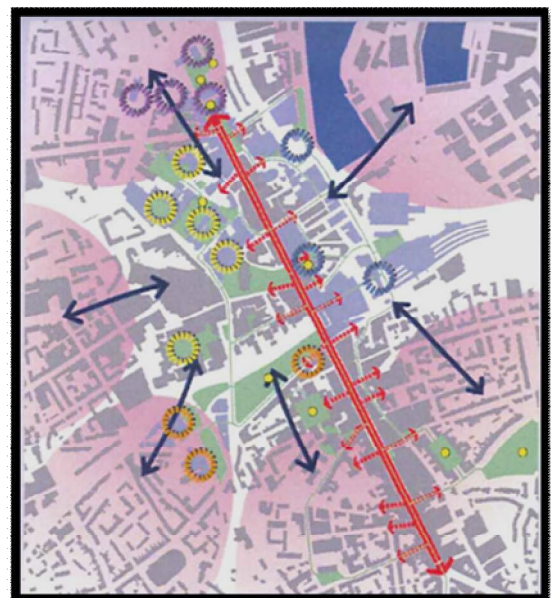
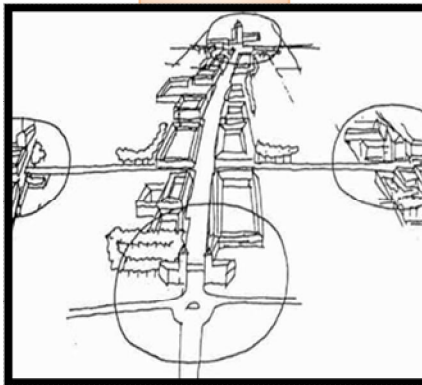
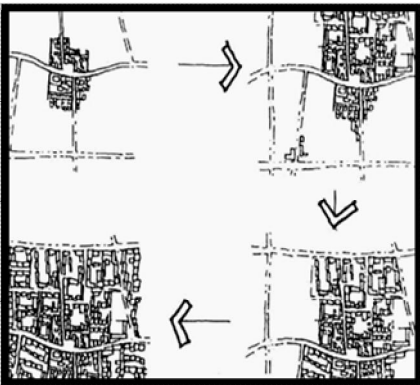
- PROMOTING INCREMENTALISM, i.e. acknowledging development as a continuous process and facilitating an ongoing development process,

CREATING A SENSE OF PLACE, i.e. building on the specific opportunities of each location and encouraging the creation of unique environments,

- CLUSTERING DEVELOPMENT AND ESTABLISHING A CENTRE STRATEGY, i.e. discouraging development sprawl, encouraging the clustering of compatible development and establishing a hierarchy,

IDENTIFYING ACCESS ROUTES AS INVESTMENT LINES, i.e. utilising levels of accessibility as guidance for the location of development components,

- RECOGNISING NATURAL RESOURCES AS PRIMARY ASSETS, i.e. positively integrating natural elements in the creation of a human and sustainable environment,



5.0 THE PROPOSED LAYOUT – CONCEPTUAL SITE DEVELOPMENT PLAN

Parking area to be paved and grassed.

Residential development to be in the form of two and three storey.

Communal areas to be grassed and trees to be planted. Large trees to be planted along existing residential edge to serve as a buffer.

Vehicular Access via Wakesleigh Road only.

Platform to be built around residential block for curb the flow of water.



6. THE MOTIVATION FOR REZONING

6.1 OVERVIEW

The proposed development is desirable from a contextual point of view for the following reasons:

- The site is well located within a developed context and is easily accessible.
- The proposed development utilises the site in an appropriate manner.
- The scale of the proposed development is unlikely to have a significant impact on the existing traffic network and therefore will not contribute to the congestions and delays of traffic in the area.
- The proposed development will not only provide additional housing, but it will also add value and enhance the immediate and surrounding areas. The need to rezone the site can be also based on the current trend – the need for densification and infill as well as the demand for additional residential development in a secure and safe environment.
- The development will form part of a sectional title and all internal services and maintenance will be managed by the body corporate.

6.2 TO CONSIDER CONTEXT

A key feature that underpins the motivation for rezoning is the potential use of the site to contribute to, and be mindful of, the local context. Key issues for consideration here include:

Scale and Intensity of Development

The rezoning allows for a greater compatibility of use in terms of acknowledging the local residential context. Therefore the proposed general residential 3 zone would allow for housing recognising the residential scale and intensity of surrounding development.

Increasing Amenity

The proposed rezoning allows for the development of housing that would enhance local amenity.

6.3 NEED AND DESIRABILITY

The main purpose of establishing *need and desirability* is to ensure that the land use development proposals are *necessary* for development purposes and *desirable* in the public interest, resulting in sustainable land utilization which is publicly acceptable and relevant in terms of overall economic growth and development, convenience, and benefit at all levels. The central question relating to development applications of this kind is whether or not it satisfies the twin criteria of "*need and desirability*". That is, whether there is a *need* for the proposed subdivisions and whether they're *desirable*.

The term "need" and "desirability" is primarily assessed from the perspective of the common or public good. That is, the primary issue is not whether the rezoning and subdivision proposals are in the interests of the applicant, but whether it is in the interests of the broader community. This in turn, needs to be examined from two perspectives: the degree to which the proposed rezoning and subdivisions make a positive input into the lives of affected people, and the degree to which their impact may impinge upon, or negatively affect, other people's rights.

Need and desirability has always been a fundamental principle of most Planning and Development Acts (in KwaZulu-Natal this is still enforced by Act No 5 of 1998), and is used as a yardstick to formulate and assess development proposals.

Moreover, it shall apply specifically to areas which fall under local development plans, where the proposal may not accord with adopted policies or plans.

6.3.1 Need

1. In terms of the eThekweni Integrated Development Plan, there is a need for affordable but safe housing accommodation, as well as employment opportunities. The proposal assists in meeting the above needs, through the provision of additional housing.
2. Over the last five years, a vast amount of effort and investment has been directed into provision of housing in greenfields areas in and around Durban. Much of the investment has gone to the coastal areas but here is a growing market for affordable and well-located residential infill development in existing well-established residential areas. The Bellair Area has identified a niche market for which there is a growing preference and need for further housing opportunities in the southern part of Durban. What is of utmost significance here is the issue of affordability. The Natal North Coast has become synonymous for providing middle to high income housing opportunities, which with its often too pricey cost of homes in the area (eg Mt Edgecombe, Umhlanga etc), puts the first time home buyer totally out of the market. This project assists by offering a unique opportunity for housing for the lower middle to higher middle income brackets on the southern parts of the metro, in close proximity to existing social, recreational and employment opportunities.
3. In parallel to the issue of affordable housing, is that of employment opportunities. Residents will not have to travel far for work, as the project will offer employment opportunities in the construction sector. Studies have shown that a vast amount of residents in the Bellair area currently involved in the construction industry, still travel far to work on a daily basis, and with the provision of various work options in the area, this will impact greatly on the current trend of migration to areas outside the project area for work purposes.

6.3.2 Desirability

In terms of desirability, the rezoning has a number of features to its benefit. These are as follows:

1. Local Benefits

The site identified for development occupies a desirable and accessible location in the Bellair area. The site enjoys quick and easy access to a number of key roads which is valued highly by residents and commuters as it means quick and convenient access to the range of commercial, office, business, entertainment and residential facilities in and around Bellair and surrounding areas.

The employment issue is important in that the proposed development will generate employment opportunities in the area. Opportunities will be created in construction, maintenance, certain professional fields and in domestic employment. The whole of the broader Bellair and surrounding areas will benefit from the economic spin-offs from the development. The very significant amount of direct employment and down-stream employment generation, will contribute to reducing unemployment throughout the area.

2. Spatial relationship to residential areas

As a residential development project, the proposed development assists in densification of the existing urban fabric and therefore also in meeting the objectives of creating a more compact city. Therefore, the site for development is well situated in relation to surrounding residential areas.

3. Accessibility

The property enjoys good visibility being located along a major residential collector road (Wakesleigh Road and Cliffview Road) and gains direct access from Vusi Mzimela Road (Bellair Road) and Solomon Mahlangu Drive. This road can be

considered as a major link to N2 respectively. The site is strategically located in terms of connecting to the higher order roads within the wider area.

4. Traffic

The analysis of existing traffic volumes on the surrounding road network showed that there is little existing congestion on any of the roads including intersections that are likely to feed the proposed site.

5. Impact on surrounding social facilities

Since this development is regarded as minor, the impact on the surrounding social facilities and services will be minimal (such as the existing schools). A broad based study of the area suggests that the existing community facility sites (both developed and vacant) are sufficient to sustain/accommodate the projected yield of the rezoning.

6. EXTRACT FROM THE ETHEKWINI SPATIAL DEVELOPMENT FRAMEWORK RELATING TO INFILL AND DENSIFICATION – PAGE 93

THIS APPLICATION TAKES THIS INTO CONSIDERATION.

6.5 Promoting a Compact City Form

The Municipality is striving to ensure that people are brought closer to where they live, work, study and relax. While the Council is committed to bringing people closer to areas of economic activity, the principle of sustainability will be the driver to ensure that people are living in harmony with the environment. Using the Municipal Spatial Development Framework (SDF) and supporting Package of Plans, the Municipality is committed to the zoning of land in appropriate areas in order to increase densities and reduce urban sprawl. The Municipality will also limit urban sprawl and associated development costs through the prioritization of infrastructure provision to support new growth areas.

The spatial strategy to achieve the above is to:-

- Limit and contain the urban development footprint within the Urban Development Line.
- Promote higher “net” residential densities in targeted areas (both greenfields and brownfields) especially within core areas, new growth areas and areas prioritised for infrastructure development.
- Create new residential development opportunities that connect fragmented areas and consolidate urban form around high accessibility routes and spines.
- The “Urban Development Line” concept is used as a tool to curb urban sprawl, promote compaction and achieve associated efficiencies, secure agriculture and upper catchment environmental assets.

6.5.1 Infill and Densification

The key elements of densification are the promotion of compact, integrated and efficient city form. This can be achieved by limiting urban sprawl, by promoting higher densities, infill and re-development in and around the urban core and other activity nodes and by the promotion of mixed use activity corridors linking otherwise isolated and nonfunctional areas with a focus of public transport.

Infill refers to development of vacant or under-utilized land within the existing urban areas. In order to promote a more compact urban development, attention should be given to those areas that are not densely developed but are well serviced and centrally located. These gaps within the urban fabric should be identified for priority projects. Vacant land within the central area provides infill opportunities to make use of existing services and to strengthen internal development. Vacant land beyond the central area provides opportunities for linking and integrating peripheral areas.

6.5.2 Densification Strategy for the eThekweni Municipality

The inability to access well-located land for low-cost housing perpetuates continued outward expansion and sprawl and the inability to escape poverty. Densification of established, well-located areas (including areas around nodes and along corridors) will promote more efficient use of existing infrastructure and help create a threshold for public transport. The densification to be adopted are depended on the spatial context of development, the site specific charecteristics, the capacity of existing infrastructure and the impact of that the development will have on the environment. Within the densification strategy it is acknowledged that there has to be a balance between compactness and the retention of significant open space to satisfy other social and environmental needs.

EThekweni Municipality Framework Planning Branch is currently undertaking a densification strategy which will look at different areas of the metro that will be suitable for densification. The strategy will make use of existing planning and development tools, policies and plans within the city, and will strive to ensure that densified development is:

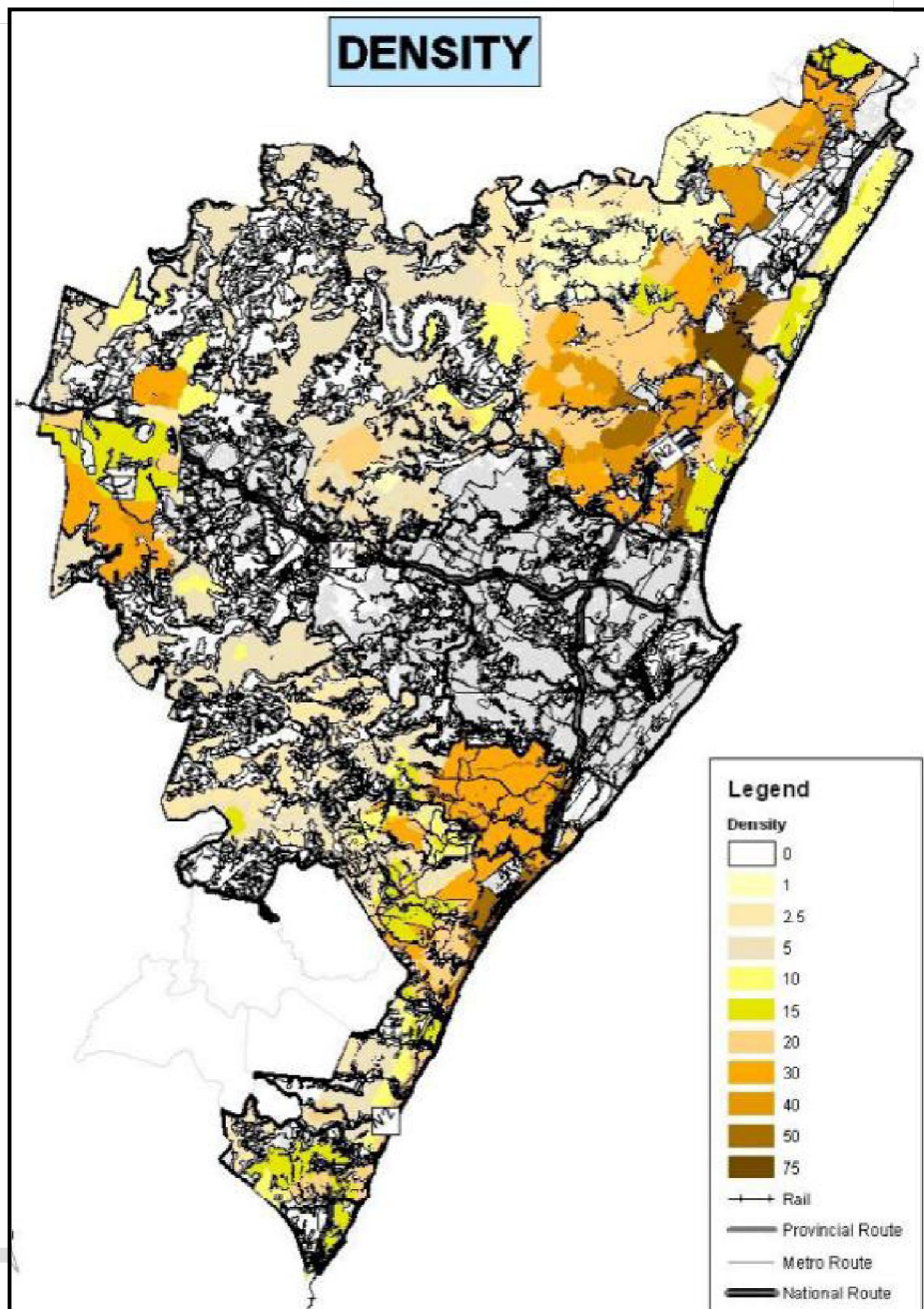
- Located along Integrated Rapid Public Transport Network
- Located within identified Nodes and Corridors
- With urban densities within the Urban Development Line (UDL) and rural densities without
- Within available services and close to social facilities
- In proximity to economic/employment opportunities.

Some innovative thinking will be key to the success of the strategy, and there will need to be a focus on Brownfield rather than Greenfield development. Creative land assembly strategies and the rethinking of restrictive housing typologies are critical to the success of sustainable densification. Innovation in design that reduces the environmental impact of densified development (energy efficiency of buildings eg building orientation, recycled water systems, solar water heating etc.) and to create integrated, healthy and safe communities is essential.

6.5.3 Methods of achieving Densification at eThekweni

The different methods for achieving densification can occur through:

- Infill development on vacant or underutilized parcels of land at higher densities. A range of infill processes may include transfer of development rights, land swaps, land consolidation, public housing projects and so forth.
- New development on vacant or under-utilized land at higher densities
- Cluster development on large parcels of land through a consolidation process
- Conversion of existing building (sometimes vacant/derelict) to other uses
- Subdivision of large pieces of land to encourage higher densities
- Allowing additional units to be developed on a single piece of land
- Redevelopment of poorly functional areas to encourage and facilitate infill



7. CONCLUSION

This report has provided the background, a statement of the current situation, and motivation which support the rezoning of the site.

The proposed rezoning allows for the development of a good quality residential development in an established environment. We believe this to be in keeping with the existing context at a local level. Judging from the above key points, it can be seen that the proposed development can be seen as being both a "need" and "desirable" at a local level.

To conclude, it should be noted that the establishment of need and desirability in a case of this kind must be examined from a number of perspectives:

The best use of the land

The issue of whether or not the proposed use represents the best use of the site in question is a central one to any development application. The "best use" of the land must be viewed from one important perspective: from the site's locational uniqueness. The site is suited for residential development. In addition, the site's location along district and local transport network assist in increased accessibility, which makes the positioning of the site more desirable.

○ Impact on traffic flows

An important impact, which needs to be evaluated, therefore, is the potential effect of the infill project on traffic flows, and the impact of these flows on the operation of Bellair at a broader scale. Significantly, this evaluation needs to occur at two scales: impact on the surrounding areas and the impact on the larger sub-district. It is submitted that there will be no traffic impact on the existing road network as well as the surrounding sub-metropolitan network.

Impact on surrounding uses

A development of this scale does not have the potential to affect the surrounding uses to any considerable degree, and therefore no major negative impacts. It is clear that the proposed rezoning will not change the overall character of the area; however it will improve the nature and integrity of the surrounding existing residential areas, by providing quality, safe and affordable housing.

○ Environmental and Geotechnical considerations

As the site does not form part of DMOSS, no environmental scoping reports would be required, however an environmental assessment has been completed. From a geotechnical perspective, the site's broad investigation proved to have no geotechnical constraints which would limit or prevent residential development.

Concluding statements:

Judging from the above key points, it can be seen that the rezoning of the infill project can be seen as being both a "need" and "desirable" at both a local and sub-metropolitan level.

In addition, other merits to be noted include:

- The development of the site will assist in meeting the demand for additional residential development in the Bellair and surrounding area.
The development of the site it is argued, does not impact negatively on the surrounding environment, in terms of visual and traffic impacts.
- No conceivable interference with amenities will arise.

As can be seen, the proposed development proposals are both needed and desirable, and meet the requirements of the local town planning scheme and its controls and regulations, and subsequently, the Central Operational Entity is respectfully requested to approve this application.