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18 April 2019

The IDP Manager/Town Planner
Mkhambathini Municipality
Private Bag X 04
18 Old Main Road
Camperdown
3720

Attention: Ms Elaine Donaldson
DonaldsonE@mkhambathini.gov.za

Dear Madam,

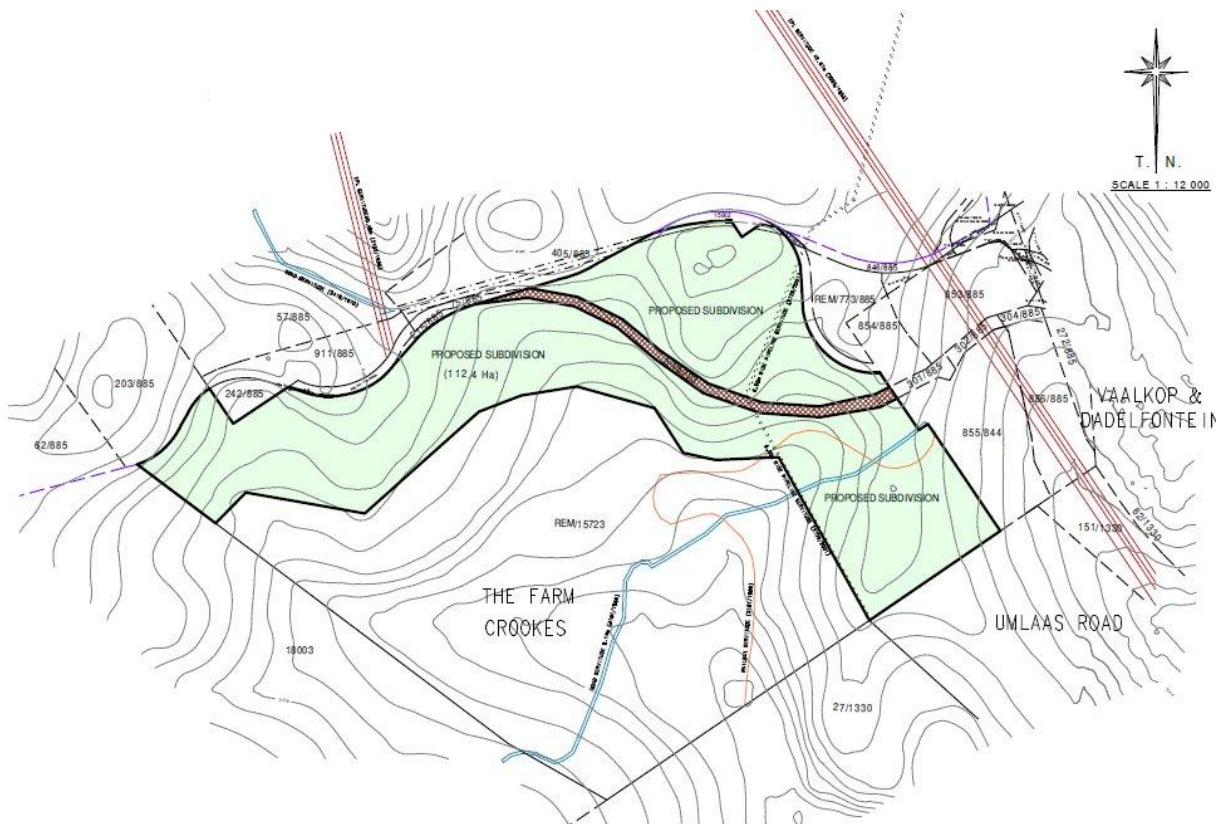
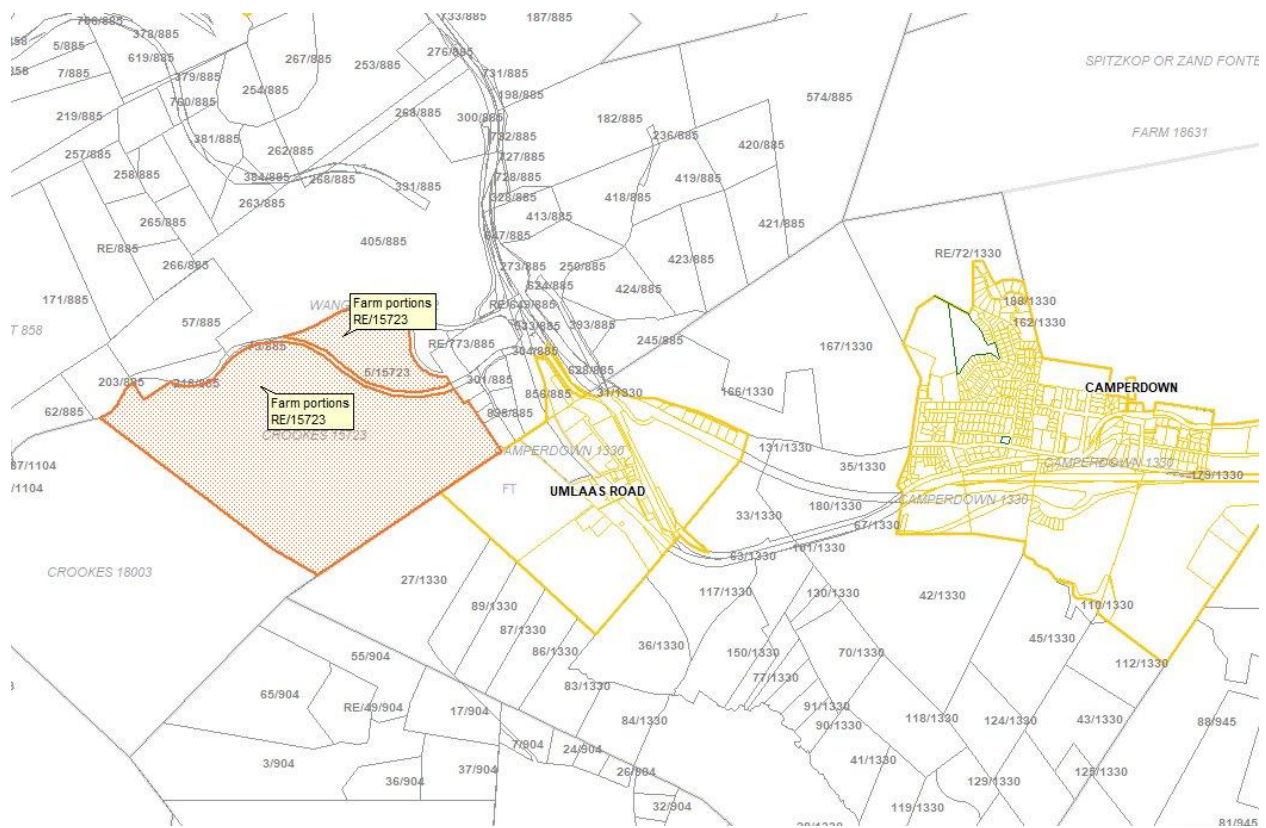
PROPOSED INCLUSION OF THE REMAINDER OF THE FARM CROOKES NO. 15723 IN THE INDUSTRIAL DESIGNATED AREA IN THE REVIEW OF THE MKHAMBATHINI SPATIAL DEVELOPMENT FRAMEWORK 2019: ROKWIL PROPERTY DEVELOPMENT COMPANY.

I refer to the press advertisement of February 2019 calling for comment on the *Review of the Spatial Development Framework (SDF) for Mkhambathini Municipality 2019*. Comments are required to be lodged by 18 April 2019.

I represent Rokwil (Pty) Ltd a property development company based in Kloof. Rokwil have been responsible, among other for the Keystone Park, a catalytic industrial/logistics township established near the Hammarsdale interchange, which is currently being upgraded on the N3 between Durban and Pietermaritzburg. This has lead to massive investment in the area which will have significant spin offs for the local economy and in the creation of jobs. See <http://rokwil.com/> for greater detail on the company's activities.

1 DEVELOPERS INTENTIONS

Rokwil would like to establish a similar catalytic light industrial/logistics township located on portion of the Remainder of farm Crookes No 15723 adjacent to Umlaas Rd and flanking the Dardanelles Interchange within the Mkhambathini Local Municipal area. In this regard they are looking at an area of some 140 hectares in extent which is indicated in Figure 2 and Figure 8. This township would then be developed in phases.



2. ROAD IMPROVEMENTS

The current Dardanelles Interchange of the N3 with Main Road 338 is proposed to be significantly upgraded by SANRAL. This will provide greatly improved accessibility for both MR 338 and MR 21 to the N3 and so will provide a strategic advantage to any properties with access off these provincial roads in this vicinity. See figures 3 and 4 showing current and proposed.



Figure 3 -
Existing
Dardanelles
Interchange



Figure 4 -
Proposed
upgrade by
SANRAL of the
Dardanelles
Interchange of
Main Road 338
and Main Road
21 with the N3

3. THE SITE IN CONTEXT OF THE MSUNDUZI SDF

The Msunduzi SDF has in their planning recognized the strategic opportunity presented at this node where the MR 338 links to the N3 on the SIP 2 corridor linking Durban and Johannesburg. They have designated it as part of their key centers within a polycentric city with the area in the immediate vicinity of the Dardanelles interchange designated for Logistics/Business purposes while the extension along the northern flank of the MR 338 to the west has been identified for Agri-Business/Commercial purposes. See figure 5. The Remainder of farm Crookes No 15723 lies immediately opposite and to the south of these proposals over the MR 338.

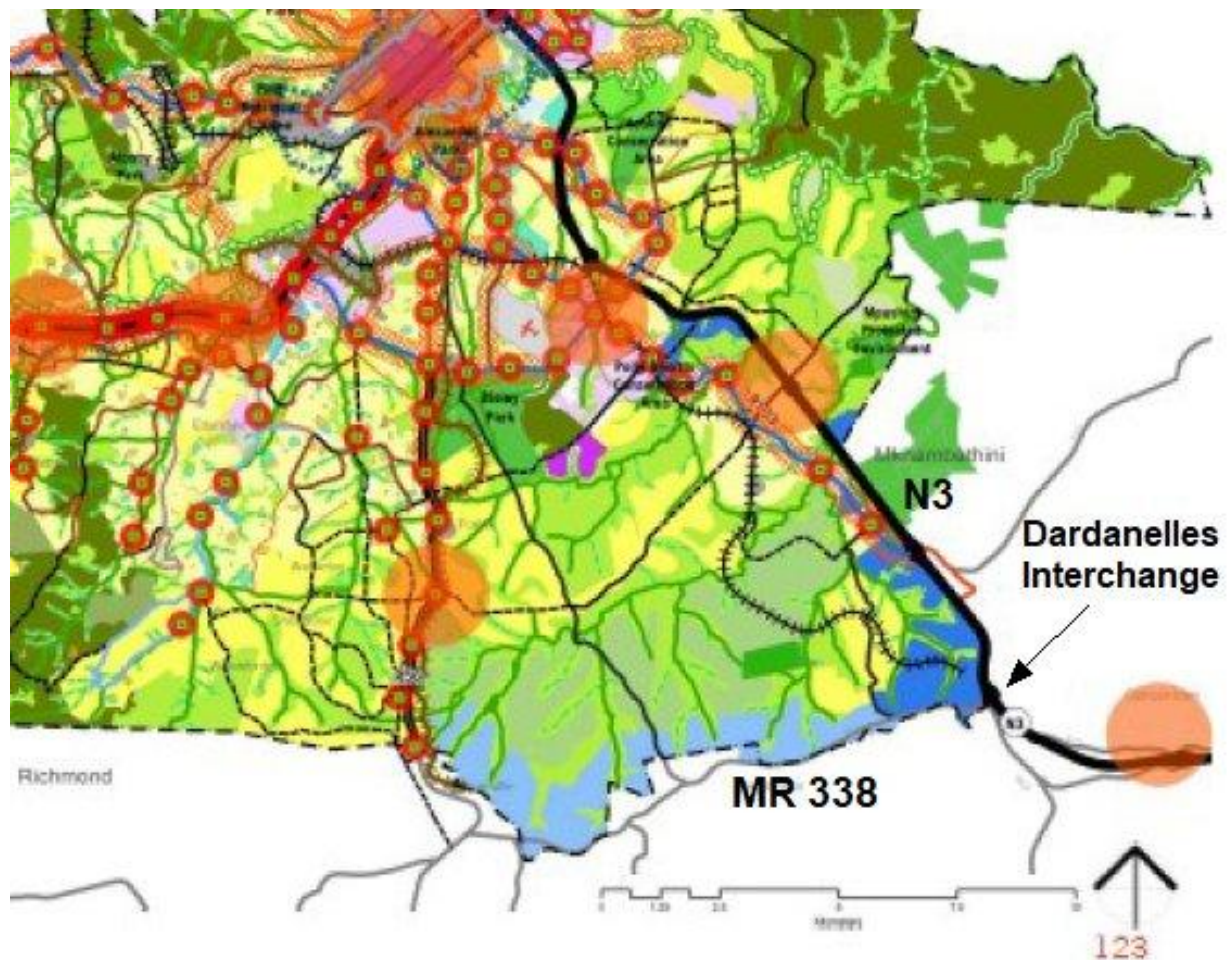


Figure 5 – Extract taken from Msunduzi SDF –Showing Logistics and Business (Dark blue) and Agric-Business/Commercial (Light Blue) along the MR 338

4. THE SITE IN CONTEXT OF THE MKHAMBATHINI SDF

The draft review Mkhambathini SDF 2019 on the other hand has apparently ignored the potential presented by the node while simultaneously acknowledging that from an agricultural perspective the land immediately flanking the southern side of the MR 338, i.e. the proposed portion of the Remainder of farm Crookes No 15723, is classified as *Secondary* with only a low agricultural potential – the lowest of the four agricultural categories in the SDF. See Figure 6.

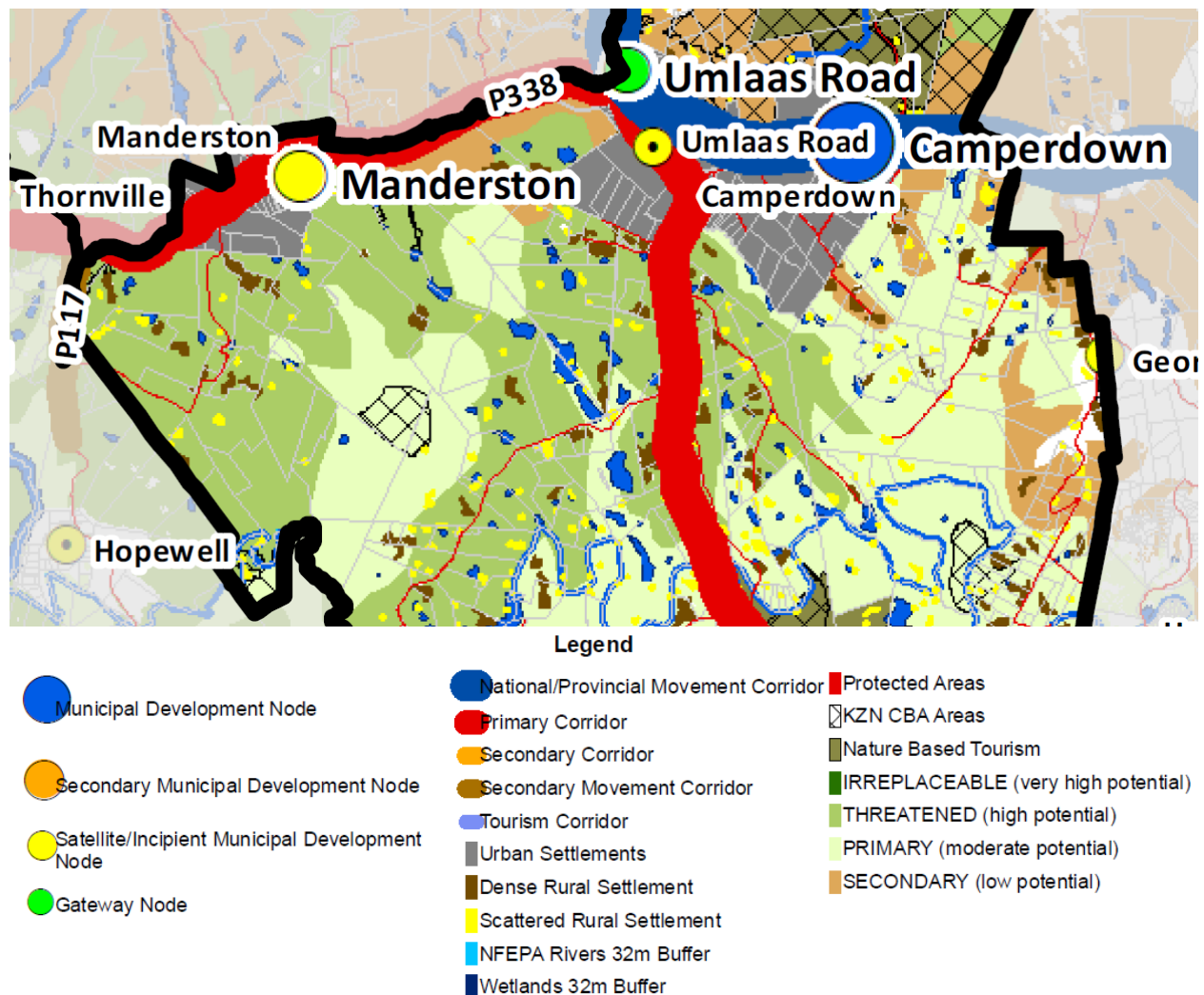


Figure 6 - Extract from the Composite Mkhambathini SDF showing low potential secondary agricultural land along the P 338.

Logically it might have been anticipated that all things being equal the Mkhambathini SDF might have mirrored that on the Msunduzi side of the road given the strategic advantage that access to the N3 presents. The fact that this land is classified as *Secondary* with a low agricultural potential makes it even harder to comprehend.

The draft SDF has designated additional land for industrial development in the proposed growth boundary map for the Camperdown/Umlaas Road Node – see Figure 7 – pale purple, but with respect a lot of this land is fragmented and fraught with servicing challenges including road access and straddles a wetland. These are challenges with individual small developers will have great difficulty in overcoming. It would also appear from Figure 6 that some of this land now designated in the SDF for industry is classified as *Threatened* with a high agricultural potential. The proposed development site flanks existing industry in the east and extends westward along the MR 338.

FIGURE 26: PROPOSED GROWTH BOUNDARY FOR THE CAMPERDOWN / UMLAAS ROAD NODE

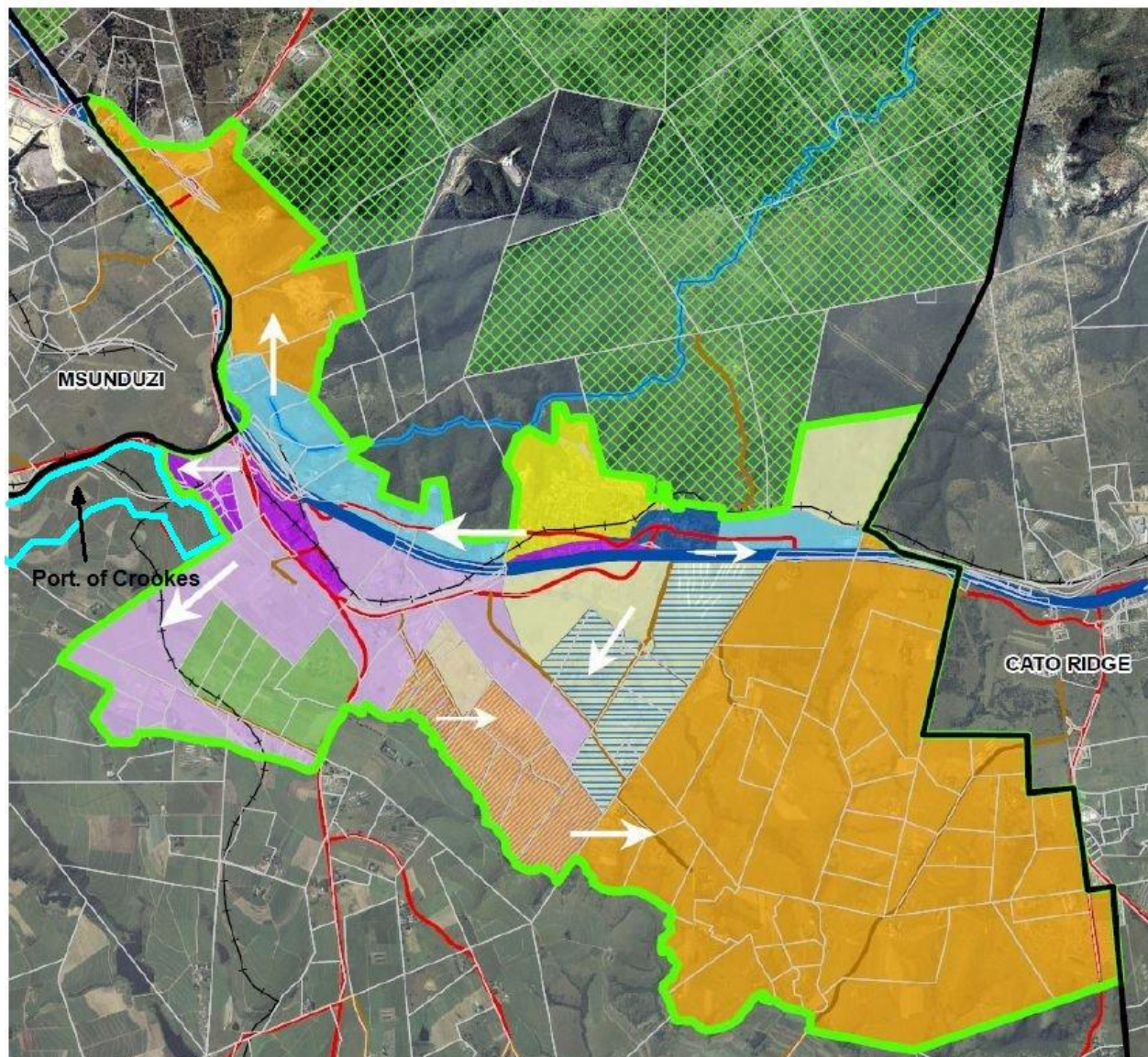


Figure 7 – SDF Growth Boundary Map for Camperdown/Umlaas Road showing Portion of Crookes No 15723 outlined in turquoise flanking existing industry and MR 338.

Therefore despite arguably all National, Provincial and District Planning pointing at the strategic positioning at the node and, therefore, sensibility of the development of portion of the Remainder of the Farm Crookes No 15723 (and in so doing providing the catalyst for the development and consolidation of the envisaged light industrial node at Umlaas Road) this area has not been included for industrial development within the 5 year timeframe of the draft SDF 2019, albeit that arrows indicate longer term future growth in this direction. This will have the effect of stifling potential development in the node and with it the creation of thousands of temporary construction and new permanent skilled jobs.

5. THE DEVELOPERS AND THEIR TRACK RECORD

Rokwil Property Developers in addition to numerous commercial, retail and light industrial developments, are, as previously stated above, the developers of the new 152 hectare Keystone Park Light Industrial Estate under construction adjacent to the N3 Hammarsdale Interchange and costing R6.5billion. Having secured all approvals from the eThekweni Municipality in March 2015, the regionally catalytic Keystone Park Development already accommodates operational facilities in the region of 170 000 m² under roof including both Mr Price Group and Ackerman's new Distribution Centres, both valued at R1 billion each. Several further complimentary industry specialist facilities, totaling some 21 000 m² are currently under construction including a new food blending facility for Kerry Ingredients – a R1 billion FDI project including the recently committed 115 000 m² R1.25 billion Pepkor Distribution Centre. Keystone Park will have created or secured in excess of 4 000 permanent skilled jobs within 4 years.

6. DEVELOPMENT PROPOSALS FOR PORTION OF REM OF THE FARM CROOKES

The developers propose a total of approximately 120 to 140 hectares of light industrial development developed in phases with the remainder of the 252 hectare farm dedicated to both respecting and improving on the existing 'significant' drainage and wetland system together with some formalised market gardens to act as a further buffer to the freshwater ecosystem and agricultural community thereafter, i.e. 110 to 130 hectares dedicated to non-industrial land. This appears in contrast to what the SDF currently proposes where the wetland and *Threatened* high potential land is intruded upon – see Figure 8.

This catalytic development will look to continue to consolidate the strategic regional advantage of the area for the storage of new motor vehicles (approximately 60 hectare) but also to contribute significantly to job creation and skills development for the local community by providing appropriately sized light industrial sites (approximately 60 hectare in total) which will either support the vehicle storage operations or benefit from and or contribute to the N3 logistics and transport corridor.

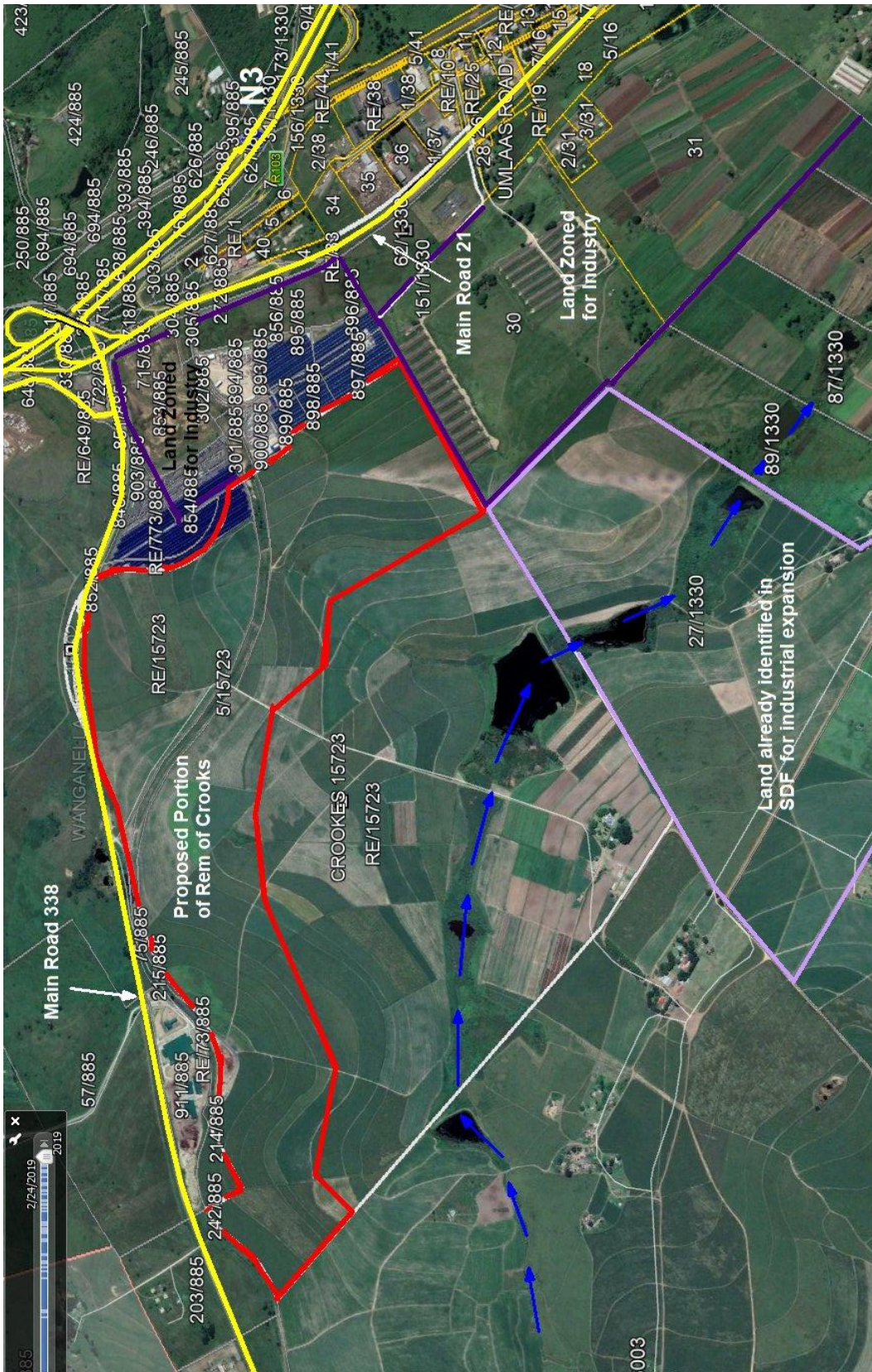


Figure 8 - Showing proposed Portion of the Rem of Crookes No 15723 in red in relation to existing industrial zoning in purple and SDF proposed expansion in mauve

Alignment of the proposed Development Vision with National, Provincial and District Planning, as was done with Keystone Park, is viewed as critical. The proposed light industrial estate on Portion of the Farm Crookes No 15723 will align with, the National Strategic Infrastructure Project 2 (SIP2) thereby benefitting from, and contributing to, the critical N3 logistics and transport corridor as well as the Provincial Spatial Economic Development Strategy (PSEDS) being located on the primary N3 Priority Corridor. These critical planning informants are driving both SANRAL's current focus on upgrading the Dardanelles Interchange to accommodate increased logistics operations in the region as well as the Msunduzi Municipality's identification, in their SDF, of significant light industrial and commercial development opportunities immediately opposite Farm Crookes across the (Ixopo – Richmond) road.

The uMgungundlovu Economic Development Agency has since added its support for this development proposal seeing both the experienced developer as well as the substantial light industrial development proposal as credible catalysts for the much-needed economic development, and upliftment, of this local municipality and the thousands of permanent skilled jobs this will create.

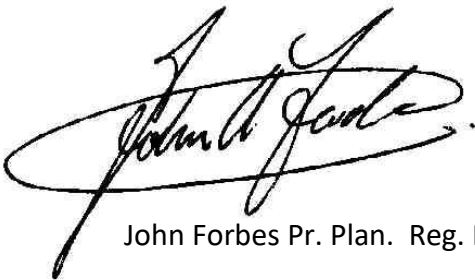
Finally, it should be noted that in a letter dated 24 February 2017 addressed to Mr C Chamblor the director of Tamasa Trading CC the owner of the Rem of the farm Crookes No 15723 by Tongaat Hulett, they have indicated that the farm or portions thereof may be released from their Cane Supply and Milling Agreement, with the proviso that it remain under cane until the developers are ready to commence with development. This, it is suggested, should be done via a lease back agreement for the period from when transfer occurs until the development commences.

7. CONCLUSION

Rokwil are prepared to commence with applying for all the necessary development approvals (Planning, Agricultural, Environmental, Traffic and Water Use) as soon as the Local Municipal planning framework aligns with and supports such a catalytic development. To do so without the necessary Municipal support would be reckless and would almost certainly result in refusal from the respective Departments dealing with these matters.

Should the draft *Review of Mkhambathini Municipality SDF 2019* not be revised as suggested, it will inevitably have the effect of delaying the potential development of Portion of the Farm Crookes No 15723 for until at least the next review of the SDF in five years or longer and with it the creation of thousands of jobs.

The development of Portion of the Farm Crookes No 15723 by a developer with a proven track record of delivery presents a strategic opportunity to the Mkhambathini Municipality via the investment by a serious developer to give the necessary (catalytic) impetus for the deliver economic growth and jobs to its inhabitants. If this opportunity is turned down, it may be many years before it arises again with development going to other areas in preference.

A handwritten signature in black ink, appearing to read 'John Forbes', with a large, sweeping flourish underneath.

John Forbes Pr. Plan. Reg. No. A/457/1986